

Coventry Local Plan Review

Regulation 19

Proposed Submission (Publication) Stage Representation Form (guidance note below)

Ref:

(For official use only)

Name of the Plan
to which this
representation
relates:

**Coventry Local Plan Review – Regulation 19 Proposed
Submission (Publication)**

**Please return to Coventry City Council in writing or electronically by 23:59 03
March 2025 email to planningpolicy@coventry.gov.uk, via our consultation portal
<https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy
Team, PO Box 7097, Coventry, CV6 9SL**

Please refer to the following data protection/privacy notice:
www.coventry.gov.uk/planningpolicyprivacynote

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details***2. Agent's Details (if applicable)**

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	Mr
First Name	Sam	Paul
Last Name	Rogers	Hill
Job Title	Senior Planning Manager	Senior Planning Director
(where relevant)		
Organisation	St Modwen Homes	RPS
(where relevant)		
Address Line 1		1 Newhall St
Line 2		Birmingham
Line 3		
Line 4		
Post Code		B33NH
Telephone Number		
E-mail Address		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan Review does this representation relate?

Paragraph Policy DS1

4. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes <input type="text"/>	No <input type="text"/>
(2) Sound	Yes <input type="text"/>	No <input checked="" type="text"/>
(3) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input type="text"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy DS1: Overall Development Needs

The draft policy states:

“Over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental enhancements:- a. A minimum of 29,100 additional homes...”

The draft housing requirement set out in Policy DS1 equates to 1,455 dwellings per annum over the 20-year plan period. This figure is derived from the ‘alternative’ housing projection defined in the HEDNA (2022), which is based on Census 2021 population data, rather than using the 2014-based household projections under the previous standard methodology. In doing so, the adjustment to the standard method focuses on the household projections, but utilises the affordability adjustment.

Coventry City Council (CCC) has taken this approach because they intend to progress this Plan under the current transitional arrangements and is therefore being progressed in line with the National Planning Policy Framework (NPPF) December 2023 *so as not to slow progress on work which was already very advanced* (PSLP, para1.10). Paragraph 61 of the December 2023 NPPF states that *‘to determine the minimum number of homes*

needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need...”.

Census data on population has been used in calculating local housing need due to statistical issues with the population estimates that informed the 2014-projections, notably apparent problems with an over-estimation of students who were assumed to have remained in the City rather than migrating away. This has led to higher population residing the City than might otherwise be the case, which has fed through the higher household and housing projections. These may comprise the ‘exceptional’ circumstances, but this will need to be tested through the examination process.

The HEDNA 2022 identifies a need for Coventry of 1,964 dpa. This includes the urban centres uplift of 509 dpa. However, in coming to the chosen requirement (1,455) CCC has gone further by explicitly discounting the urban centres uplift required under the relevant standard method applicable in planning practice guidance (PPG) used to calculate the minimum housing need figure for the Plan.

The exclusion of the uplift is highly unusual. The effect is to reduce the housing requirement by 10,180 dwellings when set against the HEDNA figure. The housing requirement should reflect the evidence (HEDNA 2022) which recommended the 1,964 dpa figure as being the minimum ‘alternative’ housing requirement figure for Coventry. However, CCC provides no evidence to justify not including the urban centres uplift, and so is not soundly-based.

Applying the correct standard method figure (consistent with the December 2023 NPPF and the HEDNA 2022) the total minimum housing requirement for Coventry is 39,280 dwellings. Table 6.1 of the Plan identifies a plan period supply of 31,493 dwellings. In this basis, there is a housing shortfall amounting to 7,787 dwellings over the plan period (which is a minimum supply given those sources have yet to be tested through an examination and so may well be lower than suggested). The shortfall in housing is substantial when correctly applying the December 2023 standard method, but remains unaccounted for in the Plan. CCC should ideally pause progress on the Plan and address this issue prior to moving forward to examination. Alternatively, CCC could commit to commencing an immediate review of the Plan once it is adopted, with the stated purpose to accommodate the shortfall as a matter of urgency. Either solution will ensure the Plan is soundly-based.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination).

You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure that the Local Plan is justified on the evidence, CCC should modify the housing requirement in Policy DS1 to a minimum of 1,964 dpa (and 39,280 over the plan period) and plan to meet the resulting shortfall, either within the City or by working with neighbouring areas under the duty to cooperate.

Alternatively, modify the Plan setting out clearly a commitment to commencing an immediate review and make clear this is necessary to address the shortfall.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To represent the views of St Modwen and respond to issues raised at the hearing sessions

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.