

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/planningpolicyprivacynotice

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

First Name

Rajvir

Last Name

Bahey

Job Title

Planning Manager

(where relevant)

Organisation

Sport England

(where relevant)

Address Line 1

Sport England

Line 2

SportPark

Line 3

3 Oakwood Drive

Line 4

Loughborough

Post Code

LE11 3QF

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

4. Do you consider the Local Plan Review is:

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

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.

Sport England note the continuation of the employment land allocation JE2:4 Land at Baginton Fields and South East of Whitley Business Park and housing allocation H2:19 Land at Mitchell Avenue, both sites include playing field land which could be lost as a result of the development of the sites. It is also noted that Policy GE2 Green Space allocates two sites for the provision of new sports pitches, to support the allocation of JE2:4 and H2:19.

Sport England are unable to identify the potential replacement playing field sites highlighted in Policy GE2, with the site not appearing to be displayed within the proposal map. As such, Sport England are unable to make an assessment as to whether the two sites would be at least equivalent in quantity and quality to that proposed to be lost at site allocations JE2:4 and H2:19, in line with NPPF paragraph 104b and Policy GE2.

Linked to this if there is a loss of provision playing field land, no assessment has been submitted to demonstrate that the playing field land (and ancillary provision) is surplus to requirement in accordance with the abovementioned policies. As part of this a local assessment of need should be provided having regard to the Council's Playing Pitch and Outdoor Sports Strategy 2023.

As such it is considered that the allocation of JE2:3 and H2:19 is not justified as it has not been demonstrated how the allocations meet the requirements of NPPF paragraph 104. Consequently, there is no justified reason as why the sites should not be subject to all of the policy requirements set out in Policy GE2.

(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.

Sport England consider all site allocations which would result in the loss of playing field land (and ancillary provision) should be subject to Policy GE2 to ensure compliance with the requirements of NPPF paragraph 104.

Sport England therefore consider the below text (strikethrough) should be removed from Policy GE2.

Policy GE2

1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless ~~specifically identified as part of a strategic land use allocation~~, or it can be demonstrated that.....

More specifically, it should be demonstrated that Land at Charter Avenue and Land East of Coundon Wedge Road, proposed replacement sites for allocations H2:19 and JE2:4, meet the requirements of NPPF paragraph 104b (and Sport England Exception Policy E4). It should be noted that Land at Charter Avenue appears to be an existing playing field site, and it has not been demonstrated that it is not required to meet any shortfalls in playing field provision independent of being mitigation for the loss of proposed site allocation H2:19.

If the above, is not demonstrated Sport England consider that GE2 point 4 is deleted to ensure conformity with NPPF paragraph 104:

~~To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches:~~

~~Land at Charter Avenue (former Alderman Harris School site).~~

~~Land east of Coundon Wedge Road.~~

(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)?

X

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:

(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.