

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

First Name

Last Name

Job Title

(where relevant)

Organisation

University of Warwick

Turley

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

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.

The adopted SPD for the University of Warwick states that the University currently provides accommodation for c7500 students on campus (as of February 2024). The University's aspiration is to continue to investigate the increase of its stock of student accommodation and renew existing accommodation, with a view to ensuring that at least the current ratio of on/ immediately adjacent to campus accommodation to students is maintained. The number of students attending the University is expected to grow by the year 2033. The University's aspiration is to increase the number of student bed spaces serving the University by c1200 by 2033, either within or immediately adjoining the campus

In the previous round of consultation on the Local Plan, the University made recommendations on the proposed amendments to Policy H10, noting support for a policy which requires new student accommodation to be within and within easy reach of, the campus, but suggesting that the defined '15 minute walk' as proposed, was removed.

It is encouraging that paragraph 6.47 states that for the purposes of 'campuses' within Policy H10, for the University of Warwick, this is the area as defined in the adopted University of Warwick SPD. It is also welcomed that the reference to '15 minute walk' has been removed.

However, the University consider that the policy as currently drafted is not fully clear and should be amended at a number of points.

Part 1 of the Policy states that “*PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus, unless exceptional circumstances demonstrate otherwise*”. There is no definition of what ‘*immediately adjacent to the campus*’ means and the University consider that this needs to be defined.

Part 2 a and b of the policy relates to proposals outside of the locations identified in part 1 (within or immediately adjacent to campus).

However, it is not clear as to whether parts 3,4 and 5 relate to all PBSA proposals whether within/immediately adjacent to campus or in other locations. If it is intended that these parts of the policy relate to all proposals, then the University consider these requirements to be inappropriate for proposals within the campus.

Any student accommodation built within the campus should not be required to demonstrate its adaptability to general housing. The campus location means that the only use of student accommodation would be as student accommodation. Provision of general housing within the campus would not be supported or considered appropriate by the University.

Parts 4 and 5 of the policy refer to the type of accommodation proposed, requiring that proposals for studio accommodation be assessed against evidence and requiring that proposals must comprise predominantly cluster units.

The University is supportive of a range of types of accommodation being provided. However, it is considered inappropriate for parts 4 and 5 of the Policy to be applied to new student accommodation within the campus, provided by the University. The University monitor and manage its own accommodation and know what type of accommodation is required and desired by students at a particular time. This includes cluster flats of more than 8 units. Therefore the University should not be restricted by part 5 of the policy which limits cluster units to no more than 8 per cluster.

Part 2a of the Policy refers to PBSA proposals in locations not within or adjacent to the campus, will only be considered appropriate if the monitor and manage approach demonstrates need for additional accommodation and there is support from one of the city’s universities that evidences such a need. It is unclear whether part 2b is essentially requiring a ‘Nomination Agreement’ to be in place with one of the Universities to demonstrate this ‘support’. The University of Warwick does not currently enter in Nomination Agreements with private PBSA providers prior to developments being built, so would raise concern if this is the intention of this part of the Policy. Clarification on this point is requested.

(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.

The University consider that Policy H10 needs to be amended to make it a sound policy. As currently drafted it is unclear whether parts 3 onwards relate to on campus student accommodation development as well as 'other' locations.

It is suggested that Policy H10 be amended as follows (additional text in red):

Policy H10: Student Accommodation

1. PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus, unless exceptional circumstances demonstrate otherwise. [Footnote/text definition/glossary to be added to define what is meant by 'immediately adjacent']

2. Purpose Built Student Accommodation (PBSA), proposed outside of the areas identified in point 1, whether new build or conversions, will be delivered in line with the Council's PBSA monitor and manage approach and will only be considered appropriate where:

a) The PBSA monitor and manage approach demonstrates evidence of need for additional student accommodation; or

b) There is support from one of the City's universities that evidences a need for additional student accommodation [Footnote to be added to confirm such support does not need to be a Nomination Agreement].

3. Proposals (other than those within the University of Warwick Campus) must provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future.

4. Developments (other than those within the University of Warwick campus) that comprise a predominant studio ratio will be considered in line with the most up to date available evidence.

5. Proposals (other than those with the University of Warwick campus) should comprise predominantly cluster units of no more than 8 units per cluster.

6. Design innovation will be encouraged within the sector, particularly in high quality affordable products, in line with the design standards set out in the Residential Design Guide SPD.

7. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.

8. Where a change of use is proposed to part of an existing student accommodation block to another residential use, the residential use must be self-contained and segmented from the student accommodation

(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)

X

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:

Given the direct impact that Policy H10 has the potential to have on the University and any future student accommodation development on and adjacent to the campus, it is considered that the University should be party to any debate and discussion on this policy.

(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.