

# 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](mailto: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](http://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	Ben	
Last Name	Wrighton	
Job Title	Head of Planning & Development	
(where relevant)		
Organisation	Watkin Jones	
(where relevant)		
Address Line 1	12 Soho Square	
Line 2	London	
Line 3		
Line 4		
Post Code	W1D 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 type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(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.

The Policy does not make a clear and justified case for the locational based approach to student accommodation. We believe that the locational area is too tightly drawn ("immediately adjacent") which is not clearly supported by evidence. The Proposals Map should have clear reference to what is meant by "campus", or ideally a wider alternative area based upon reasonable journey times to campus. The reader should not be left to refer to other policy documents ("*the areas are as per the adopted Warwick University SPD, and the University and Enterprise Area of the City Centre, or future adopted university masterplan Supplementary Planning Document.*" – see para 6.47). Further, "Exceptional circumstances" (1) is not required, and is too high test based upon the evidence available. It should be adjusted to a "preferred location". It is not clear what need evidence is required as part of (2a), and therefore more guidance is required for the policy to be effective.

The Plan does not set out what the two universities are demonstrating in terms of need (2b). The Key Report states (p13) "The City Council should engage the City's universities in a more active role in the planning process" which we would assume means plan-making, not that applicants need to engage during development management. Section 5 of this evidence does

not suggest that the universities support the locational based policy. Such a policy would essentially prevent direct-let PBSA from coming forward. In WJG experience, it is unlikely that a formal agreement with a university would be received to evidence a need for more student accommodation, and in many cities, universities have naturally been reluctant to formally support applications for PBSA to protect their own interests/assets.

No evidence to suggest that there is no need for PBSA so why should design flexibility (reconfiguration) be required – not for any other use in the plan (3). This is an unnecessary waste of an applicants' time and resources and is not justified. The policy should be more focused with ensuring that the proposed PBSA is a high quality product to ensure that it does not suffer from market failure. If the student accommodation market becomes more challenged over the plan period, then it is far more likely that older properties will suffer.

Sub-policy (4) is not clearly written (therefore not effective) and should be rewritten to reflect the Council's evidence base anticipated for the plan period at the time of writing the Local Plan. We suggest a statement along the lines of "Proposals should comprise predominantly cluster bedrooms. Where studios dominate the overall mix, then evidence of need for the studios should be provided." It is equally not clear what is expected from (6) and should therefore be further justified for it to be effective and ultimately to be found sound.

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.

See above

**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

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:

**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.