

# 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.**

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## Part A

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### 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		

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**Part B – Please use a separate sheet for each representation**

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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.

Watkin Jones is actively pursuing co-living schemes in core cities across the UK, noting that Co-Living has played an important role in attracting and retaining talent and supporting economic development. Whilst co-living development can significantly contribute to flexible and affordable housing stock, co-living is considered to constitute a Sui Generis use and thus on-site affordable housing policy requirements are not typically considered applicable to such schemes. The Policy should make an allowance for the consideration of development viability in each instance, including a financial payment in lieu option. We note that the evidence base recommended "targeting a rate of 25% affordable housing (as in the draft policy). We would recommend that this is maintained at a higher rate than for build-to rent in order to encourage the delivery of larger unit types in this sector". This suggests that this is a negatively prepared policy choice that seeks to penalise less preferred tenures of accommodation which equally contribute towards the Council's housing need. It is clear that a lower level of affordable housing could be expected, and thereby justified in co-living proposals.

In respect of sub-policy (1)(a) space standards / minimum unit sizes, each co-living scheme should be considered on its own merits in terms of space

standards as this varies depending upon the scheme's scale and the specific nature of locations. This greater level of flexibility would facilitate a wider range of residential accommodation to be delivered within the City to support additional choice both in the type of offer, and the cost of accommodation.

We do not believe that there should be minimum unit sizes as this unnecessarily restricts the market through delivering innovative design across a scheme, and the ability to offer more affordable price points. If the Council requires minimum unit size, we believe the figure should start at 18 sqm based upon schemes already operating successfully in the UK. Further, the whole premise of co-living is based on smaller units in return for higher levels of shared space and better service/ affordability. Therefore, setting a higher bracket for room sizes will either prevent development from being viable, or lead to decreased affordability for local residents. In terms of shared amenity, this should be at a minimum of 3 sqm per bedroom for the policy to be effective (Policy H13(1)(f) relates). Based upon limited experience the Council offer no justification for the approach.

We do not believe that the kitchen standards (Policy H13(1)(h) relates) are necessary or justified, as this minimum standard will again affect affordability, and we do not support the statement that kitchens should not be shared by more than 8 private bedrooms. Equally, we do not support the statement that shared kitchens should not be on different floors from private bedrooms. Co-living schemes advocate much more centralised kitchens within a building to promote the wider 'community' aspect and provide better quality cook stations in a larger setting. The areas quoted mean that cooking and eating are all done locally and do not allow for a more social centralised environment, which is the main point/advantage of the co-living product. Many schemes therefore cater for far more than 8 bedrooms to build community and we strongly suggest that this upper limit is omitted as there is no evidence to suggest that residential amenity is harmed by larger kitchens – indeed the reverse is true. The concept is quite different to a PBSA cluster approach.

Finally, not all co-living schemes will provide concierge or on-site personnel (Policy H13(1)(d) relates), and there is not evidence provided that justifies this in all co-living schemes. It is notable that this is not a requirement for PBSA (or Build to Rent) which is often the Council's reference point for co-living. Again this adds additional costs to residents that is unnecessary.

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

(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)?

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

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**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:

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***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.