

The wider land presents a further opportunity to accommodate some of Coventry's housing need arising within the amended plan period of 2021-2041 that is the subject of the Local Plan Review as well providing a longer-term opportunity to deliver housing beyond the proposed plan period. The wider land (also lying within Warwick District) has been identified as a potential Strategic Growth Location (SG01) within the South Warwickshire Preferred Options Consultation, to which CEG is also making representations. A Composite Masterplan showing the full extent of land within CEG's control, and how this aligns with other landownerships is included within this representation at **Appendix 1**, whilst a Conceptual Framework and Location Plan is included as **Appendix 2**.

The National Planning Policy Framework ("NPPF"), published December 2024, sets out the transitional arrangements between the previous and current version of the NPPF for plan-making at paragraph 234. It states:

"for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need; [or] the plan has been submitted for examination under Regulation 22 on or before 12 March 2025; [or] the plan includes policies to deliver the level of housing and other development set out in a preceding local plan adopted since 12 March 2020"

The Council has reached Regulation 19 stage before 12th March 2025. Therefore, the Council consider that the previous version of the NPPF December 2023 applies under the transitional arrangements and the plan is therefore prepared against the provisions of the previous NPPF.

In terms of specific emerging policies contained within the Local Plan Review, CEG comments as follows:

Policy DS1: Overall Development Needs

CEG strongly **object** to the approach of Policy DS1 as it is **unsound** as set out below.

Policy DS1 states that provision will be made for a minimum of 29,100 (1,455 per annum) additional dwellings between 2021 and 2041. The supporting text to the policy confirms the housing need figure has been derived from the Coventry and Warwickshire Housing and Economic Development Needs Assessment ("HEDNA") (2022) and that this was confirmed to be a reliable basis for plan making in the Review of Coventry's Local Housing Need (June 2024).

The NPPF 2012 introduced a radical shift in relation to the approach to meeting housing needs. This remains in the 2023 version where at paragraph 8 three overarching objectives are outlined to securing sustainable development. Paragraph 8b states that to achieve the 'social objective' it is necessary to *"to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations..."*

Paragraph 60 of the NPPF then states that *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

Despite the additional requirements and objectives imposed by the NPPF, it is widely accepted that there is a national housing crisis due to the consistent failure to achieve the Government's target of 300,000 homes per annum, with affordability unsurprisingly worsening across many parts of the country. Accordingly, it is vital the Local Plan Review sets a positive framework to fully accommodate its housing needs and importantly, address underlying housing market issues.

By relying upon a housing requirement established by the HEDNA, the Council's approach fails to follow the requirements of the December 2023 NPPF which requires use of the Standard Method to establish the starting point for its housing requirement. However, it then leans upon the policy and delivery policy mechanisms available to ensure the City's selected housing requirement is met in full, including through use of a Green Belt review and making of additional housing allocations and declaring an unmet need if needed. CEG does not consider it to be appropriate for the Council to choose to use to comply with some parts of the December 2023 NPPF but disregard others.

The December 2023 NPPF is clear at paragraph 61 that housing need should be calculated using the Government's Standard Method unless there are exceptional circumstances (emphasis added) to justify an alternative approach. The HEDNA outlines a rationale for applying a trend-based approach, citing historic issues with calculating demographic projections due to the influence of the student population. Whilst there is a degree of merit to this approach, noting the test of national policy, it is considered that further justification is still required in this regard to meet the bar of 'exceptional' circumstances.

The use of the HEDNA figure does not account for the urban uplift, a requirement of the December 2023 NPPF. Again, there is no justification presented as to what the exceptional circumstances are to justify removal of this 35% uplift to the Standard Method figure. It is important to note that the HEDNA recommends the inclusion of this uplift as part of its assessment of housing need across Coventry and Warwickshire, however this is ignored by the Local Plan Review. Coventry, as the sub-regional centre, should clearly be taking a leading and pro-active role in meeting its identified housing need and to omit the urban uplift against national policy is an unsound approach.

Iceni, the Council's consultants, support a deviation from the 2014 projections but they continue to apply the standard framework method to the revised figures. Having arrived at a revised figure, Iceni continue to apply the other elements of the standard method including, crucially, the application of the urban uplift. This is the approach Iceni have adopted for other studies elsewhere, for example in Birmingham and in Leicester and Leicestershire.

Coventry's suggested approach is contrary to its own evidence base, which includes the 35% uplift. This revised approach appears to attempt to reduce the housing requirement as much as possible without any clear justification as to what exceptional circumstances exist to support this position.

The Council needs to be clear and explicit in the choices it is seeking to make and apply the tests in NPPF to see if it is justified in doing so. Paragraph 35 of the NPPF is explicit in that plans are 'sound' if appropriate strategies are justified, taking into account reasonable alternatives, and based on proportionate evidence. At present, it is strongly suggested the Council's approach is unsound as there is no justification for the removal of the urban uplift or deviation from the use of the Standard Method.

The Council state that their housing need will be delivered fully within the Council's administrative area through an urban and brownfield-focused strategy. CEG have serious concerns regarding this approach particularly given the worsening affordability of family housing, the finite supply of land within Coventry and the over-reliance on smaller units and Purpose-Built Student Accommodation (PBSA) to meet the housing requirement, both historically and looking forward.

Housing affordability is an ongoing and increasing pressure which will require a proactive approach to address. Furthermore, when considering Coventry's needs and the type of development that has taken place and is needed in the future, it is critically important that housing is delivered which meets the needs of the whole population.

The 2023/24 Annual Monitoring Report (“AMR”) for Coventry indicates that housing delivery is ahead of the overall requirements established in the adopted Local Plan. However, of 1,859 completions 837 (45%) of these were PBSA, compared to 1,022 (55%) residential dwellings. It is clear that Coventry’s housing needs are not based upon the provision of over half of new dwellings required to be student accommodation and CEG considers this must be addressed in planning for future delivery.

The 837 (45%) of dwellings delivered as student accommodation were in the form of flats/apartments specifically for student living. This type of housing delivery severely impacts the delivery of affordable housing which has been continually declining throughout the plan period, as PBSA is exempt from affordable housing contributions in Coventry. From a peak of 39% in 2012/13 the general trend for affordable housing completions as a percentage of the overall number has continued to decline with only 9.7% of overall completions being affordable in 2023/24.

The affordable housing need identified in the Table 8.13 of the HEDNA is 1,887 dwellings per annum. When this is compared to the Council’s selected housing requirement in the Local Plan Review of 1,455 dwellings per annum, affordable housing need would equate to 129% of the housing requirement using the trend-based projections. The selected housing requirement will quite clearly result in a significant level of unmet affordable housing need that will not be delivered if the Local Plan Review proceeds in its current form.

The Council should therefore adopt a housing requirement greater than the HEDNA figure. As noted by Planning Practice Guidance; the use of the Standard Method figure to inform the housing requirement will only start to address affordability challenges rather than address them entirely. The Council seeks to rely upon the December 2023 NPPF for the assessment of soundness of the Local Plan Review and so to fail to propose a housing requirement in accordance with the Standard Method associated with that version of the NPPF, the Council’s approach is not positively prepared or justified. To rectify this, CEG consider that the Council should instead adopt a housing requirement at least in accordance with the December 2023 Standard Method plus urban uplift.

The only way to truly address affordability crises’ and to seek to eat away at the identified affordable housing need is to plan for the delivery of more housing across the City which will in turn deliver a greater quantum of affordable housing.

The decline in the delivery of affordable housing and the rate of PBSA being delivered within Coventry further confirms the importance of providing the sufficient type and number of dwellings to meet housing need. The December 2023 NPPF states, at paragraph 63:

“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies...”

In Coventry, the importance is reinforced when looking at the needs for different house types within the HEDNA. The type of accommodation needed within Coventry is closely aligned with that required within Warwick and Stratford-On-Avon Districts and shows a clear need for family-sized market accommodation i.e. 3-bedroom houses (40%).

Local Authority	Tenure	1 Bedroom	2 Bedroom	3 Bedroom	4+ Bedroom
Coventry	Social / Affordable Rent	30%	35%	25%	10%
	Affordable Home Ownership	20%	45%	25%	10%
	Market Housing	10%	40%	40%	10%
Warwick	Social / Affordable Rent	40%	35%	20%	5%
	Affordable Home Ownership	20%	45%	25%	10%
	Market Housing	10%	40%	40%	10%
Stratford-on-Avon	Social / Affordable Rent	40%	35%	20%	5%
	Affordable Home Ownership	20%	45%	25%	10%
	Market Housing	10%	35%	40%	15%

Given the finite supply of land within Coventry and the recent trends towards the delivery of smaller units and PBSA, there is a clear need to ensure that allocations are made that can provide for a range of house types, in particular family-sized accommodation. This is crucial to help meet Coventry's housing needs and the Local Plan Review's intent to deliver the housing requirement entirely within Coventry's boundaries is likely to further constrain the type of housing that can viably and feasibly be delivered in the City.

It is therefore clear that Coventry must work with its neighbours to find suitable land for the delivery of family housing to ensure that the needs for housing for all parts of the community are satisfied, in line with paragraph 63 of the December 2023 NPPF. This issue cannot simply be deferred until the next local plan review as the shortfall will continue to compound and worsen in years to come – it is critical that this issue is addressed head-on by the Local Plan Review.

For the reasons set out above, CEG consider that the plan's failure to justify deviation from the standard method, failure to plan for the urban uplift and to plan proactively for the type of housing that is required means that Policy DS1 is not effective, nor positively prepared and is therefore **unsound**. Whether against the selected housing requirement or an uplifted requirement as dictated by the December 2023 NPPF, suitable sites capable of delivering family housing, such as Westwood Heath, need to be identified and their delivery supported. This requires working collaboratively with neighbouring authorities such as Warwick District Council now under the Duty to Cooperate given the scarcity of suitable land within Coventry.

Policy H1: Housing Land Requirements

CEG strongly **object** to the approach of Policy H1 as it is **unsound** as set out below.

As already outlined in the response to Policy DS1, CEG object to the Council's proposed housing requirement.

CEG also consider that the Council will need to work with neighbouring authorities through the duty to cooperate to meet both its overall need, assuming this is uplifted to include the 35% urban uplift, and to meet the demand for different types of housing unlikely to be delivered within Coventry's boundaries. In this regard, the Council should support development at the safeguarded land within the Warwick District Local Plan (Policy DS21 – S1) which is adjacent to the safeguarded land in the Coventry Local Plan (Policy GB2), under the Duty to Cooperate.

CEG are also promoting wider land holdings to the South of Coventry, adjacent to the safeguarded land, which offers a wider opportunity to accommodate Coventry's housing need in a sustainable location that has a strong spatial relationship with the city. The site is being promoted by CEG for development as part of the South Warwickshire Local Plan ("SWLP") and has been confirmed as suitable for development and also identified as a Spatial Growth Option in the Preferred Options consultation document.

Coventry, through the duty to cooperate, should support development of the safeguarded land (Policy DS21-S1 of the Warwick District Local Plan) at Westwood Heath and a spatial strategy that seeks to direct wider housing growth to the south of Coventry.

Further details of the safeguarded land and the wider land to the south of it, described collectively as "the site" is provided below.

Policy Context

Policy DS20 'Directions for Growth South of Coventry' of the WDLP acknowledges the transformational change that could occur in the area and commits Warwick District Council (WDC) to an early partial review within five years of the date of adoption of the plan (Summer 2022). The policy is clear that this will allow the Council to address any additional evidence regarding the need and potential for development in this area and in particular to ascertain whether necessary infrastructure has become available to allow safeguarded land to be brought forward to meet local housing need.

The Coventry City Local Plan (the subject of this review) similarly safeguarded an area of land south of Westwood Heath Road (Policy GB2) which would be released upon a review of the plan and clarity on development proposals within Warwick District.

Having regard to the above, WDC subsequently commenced preparation of a wider south of Coventry masterplan framework, which is now in progress.

Sustainable Location:

The site benefits from easy access to a range of services and facilities. It is not subject to any landscape designations, it is located within Flood Zone 1 and does not contain any designated heritage assets.

Whilst situated wholly within the Green Belt, circa 30 ha of the site is identified as safeguarded land (to meet longer term strategic development needs) through Policy DS21 of the WLP.

Part of the site is located adjacent to and south of the Westwood Heath Road and would form a natural extension to the existing residential area. It benefits from having direct frontage along the Westwood Heath Road thus enabling a new junction to be accommodated to access the development.

A number of local facilities including the Westwood Academy Secondary School, recreational pitches, a Sport and Wellness Hub, and convenience food stores are in the immediate vicinity of the site. Tile Hill station (offering connections to Birmingham and London) is 1.4km away and Coventry City Centre is 6.4km and is accessible by Bus and Cycle. Local bus stops are within a comfortable walking distance from the site along within the University of Warwick's main campus making public transport a genuine option for travel.

The site benefits from excellent pedestrian infrastructure with continuous footways on the North side of Westwood Heath Road which can be enhanced. Similarly, the proximity to the campus will facilitate access to existing cycle infrastructure and this will be integrated with the green travel corridor providing links into Coventry and across the area. This corridor also has the potential to integrate with wider connections to the HS2 interchange at Arden Cross. The site is therefore in a highly sustainable position that benefits from excellent public transport linkages.

Development in this location would provide a significant level of market and affordable housing and supporting community infrastructure. It would also help facilitate the delivery and provide financial contributions towards a green-travel corridor which would facilitate an improved southern access to The University of Warwick. These infrastructure improvements will align with the significant transport improvements already being implemented in the area, including the improvements at the A46 Stoneleigh Junction and the new crossing of the A45, which would, in its own right, deliver significant social and economic benefits locally and at the sub-regional level. Our proposals would also align with the opportunities identified by WDC through the planned preparation of a wider south of Coventry masterplan.

At this stage, a 'Conceptual Framework' is provided (enclosed to these representations) to outline how development of Westwood Heath could sustainably be delivered across land ownerships. This demonstrates that the site can address site specific considerations, comprising the following development within CEG's control:

- Circa 2,500 market and affordable dwellings of a type that will make a significant contribution to specific housing needs, divided as follows:
 - Circa 650 within the safeguarded land; and
 - Circa 1,850 dwellings within wider land.
- Employment/commercial development in a strategic location to offer collaboration opportunities between business and the university;
- Significant community infrastructure provision including a neighbourhood centre, a 2 FE primary school, sports pitches, public parkland and biodiversity parkland;
- A substantial network of green infrastructure with green corridors that will provide opportunities for sustainable travel and recreation. This will build upon a local neighbourhood concept;
- New movement corridors to help address existing traffic and associated environmental issues within Coventry and aligning with ongoing infrastructure improvements in the area, improving access to the University with the potential to facilitate access to the HS2 interchange at Arden Cross;
- Ensuring development avoids coalescence between settlements through keeping development to the North of HS2; and
- Strong connectivity to Coventry and the University of Warwick's main campus, supporting its role as a Major Investment Site

Overall, the proposals represent a highly sustainable option growth option that can deliver a range of substantial benefits.

Whilst it will be a matter for the SWLP to comprehensively consider the substantial benefits that can be delivered through large scale growth at Westwood Heath through a strategic growth corridor, it is considered that there will be substantial benefits to Coventry City through development in this location. Whilst this will be a matter for the Duty to Cooperate it is noted that paragraph 11a of the NPPF states that plans should positively seek opportunities to meet the development needs of their area. Therefore, it is considered that this local plan review should reaffirm Coventry City Council's support for growth south of Coventry, specifically at Westwood Heath.

Policy DS2: The Duty to Co-operate and partnership working

CEG **object** to the approach of Policy H1 as it is **unsound** as set out below and consider that it could only be made sound through the amendments proposed to policy in this representation.

CEG are pleased to see that Policy DS2 contains support and recognition for proposed residential development south of the city's administrative boundary. The Duty to Cooperate plays a crucial part of the plan-making process, especially in Coventry where they will need to work with neighbouring authorities meet their housing requirements, particularly affordable housing and family sized accommodation.

When plan making, Paragraph 35a of the NPPF (December 2023) states plans should be positively prepared so that that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. In fulfilling its statutory Duty to Cooperate, the Council should readily be willing to work with adjacent authorities to address its unmet housing needs. The safeguarded land at Westwood Heath (Policy DS21 – S1 of the WDLP) and the wider opportunities to the south of this safeguarded land are both sustainably located and would present a significant opportunity to assist with meeting Coventry's unmet housing need.

It is CEG's view that Policy DS2 should be further strengthened to provide a clear commitment to work collaboratively with neighbouring authorities on key areas of strategic growth, such as South Warwickshire regarding land at Westwood Heath. For this reason, it is recommended that to ensure this policy is effective and positively prepared that Policy DS2 should be amended to the following (additions **underlined in bold**):

1. *"Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.*
2. *In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.*
3. *The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.*
4. *Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, Supplementary Planning Documents (SPD) and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.*
5. *Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.*
6. *Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub-regional economy:*
 - a. *Jaguar Land Rover at Whitley;*

- b. *The University of Warwick;*
 - c. *The wider Coventry Gateway proposals;*
 - d. *Ansty Park;*
 - e. *Pro-Logis Park at Keresley; and*
 - f. *Proposed residential developments to the south of the city's administrative boundary, including:*
Land at Westwood Heath within Warwick District Council's administrative boundary.
7. *The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire."*

CEG are pleased to see that a Duty to Cooperate Statement has been published. However, in order to comply with the Duty to Cooperate, the Council needs to demonstrate that it has, and remains, in proactive engagement with other local authorities within the sub-region around the issue of the housing and employment requirements. CEG are aware, for example, that the examination of the Shropshire Local Plan has faced significant delays and is likely to be either withdrawn or found unsound due to, amongst other matters, a lack of clarity and information on the cross-boundary cooperation with neighbouring authorities. In this regard, it is considered that further information, such as Statements of Common Ground, which demonstrate engagement between the plan-making Council and neighbouring authorities should be made available ahead of the plan's submission for examination.

The scale of the changes proposed by the Local Plan Review such as departing from the standard method and opting not to apply the urban uplift is likely to have significant knock-on effects for plan-making within neighbouring authorities. The issue of potential unmet need requires clearly evidenced and ongoing cooperation. Ongoing work will still be needed as the Plan progresses including as part of the Examination in Public. Notwithstanding this, the Plan makes no mention of an update to the Memorandum of Understanding ¹which needs to be carried out given it relates to the planned distribution of housing within the Coventry & Warwickshire Housing Market Area and updated in light of emerging local plans throughout the sub-region.

Policy GB2: Safeguarded Land in the Green Belt

CEG strongly **object** to the approach of Policy H1 as it is **unsound** as set out below.

Coventry has a finite supply of land within its administrative area and recent delivery has relied upon creation of significant numbers of flats/apartments and PBSA. Coventry is also constrained by tightly drawn boundaries and is considered to have insufficient capacity when it comes to delivering family housing and consequently affordable housing which its own evidence confirms is acutely needed. Consequently, to ensure that its needs are met, Coventry City Council should be endorsing locations that are well-related and connected to the City as sustainable locations for growth. With this in mind, the Council should be clearly recognising the opportunity for growth at Westwood Heath and proactively seeking that Warwick District Council bring forward development of the safeguarded land and the wider site under CEG's control, as a spatial growth option.

Relevant to the Site at Westwood Heath, Policy GB2 states that "*Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District and progress on the South Warwickshire Development Plan*". Whilst this statement is agreed in principle, Coventry should be supporting spatial growth to the South of Coventry to address their housing requirements

¹ Between Coventry City, Rugby Borough, Warwick District, North Warwickshire Borough, Stratford on Avon District and Nuneaton and Bedworth Borough

and worsening affordable housing issue. Both through the Duty to Cooperate and in the Local Plan Review, Coventry should be providing a mandate for WDC to make these critical decisions now, proactively seeking to address issues of affordability and housing type/mix which have manifested in the City.

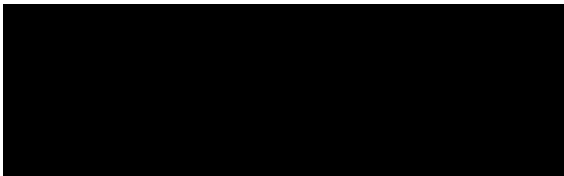
It should also be noted that in the WDLP that policy DS21 establishes the principle of safeguarded land being released to meet longer-term strategic development needs. Policy DS20 also clearly identifies the broader area South of Coventry as an area of growth and in response to this, WDC gave Cabinet approval in April 2022 for the preparation of a wider south of Coventry masterplan.

This confirms the importance of the Councils working collaboratively, as this masterplan area extends from Westwood Heath and eastwards to Coventry Airport; representing a significant area and opportunity to the south and south east of Coventry. Finally, the site is located in close proximity Coventry and to the University of Warwick's main campus, which is identified as a Major Investment Site.

Future Engagement

CEG requests to participate in the Hearing Sessions for the Local Plan Examination. CEGs involvement is considered necessary to ensure that matters raised in relation to housing, safeguarded land and Duty to Cooperate are considered during the hearing sessions.

Yours faithfully



Jack Dickinson
Associate

Encs. –

Appendix 1: Composite Masterplan (SK01 Rev A)

Appendix 2: Conceptual Framework and Location Plan (DE216)

Appendix 1 – Composite Masterplan (SK01 Rev A)

Development Schedule		
	Parcel	Ha
IM Land	1	4.5
	2	6.5
	3	6.7
CEG 1	4	2.2
	5	0.2
	6	8.0
CEG 2	7	0.5
	8	8.1
	9	4.3
	10	2.2
	11	0.6
	12	0.4
	13	7.0
	14	1.5
	15	1.3
	16	12.3
Hallam	17	4.4
	18	6.1
	19	5.4
	20	1.5
	21	2.8
	22	4.6
	23	2.0
	24	0.7
	25	1.8
	26	3.9
Warwick University	27	3.1
	28	4.0
Warwick University Total		94.2
Eco Park		200.8

Legend

IM Land

CEG Land 1

CEG Land 2

Hallam Land

Warwick University Land

Residential Parcels

Local Centre / Infrastructure

Employment

Education

Eco Park

Sport Provision / Formal POS

Spine Road

Primary Routes

Key Routes

Public Right of Way

SUDS

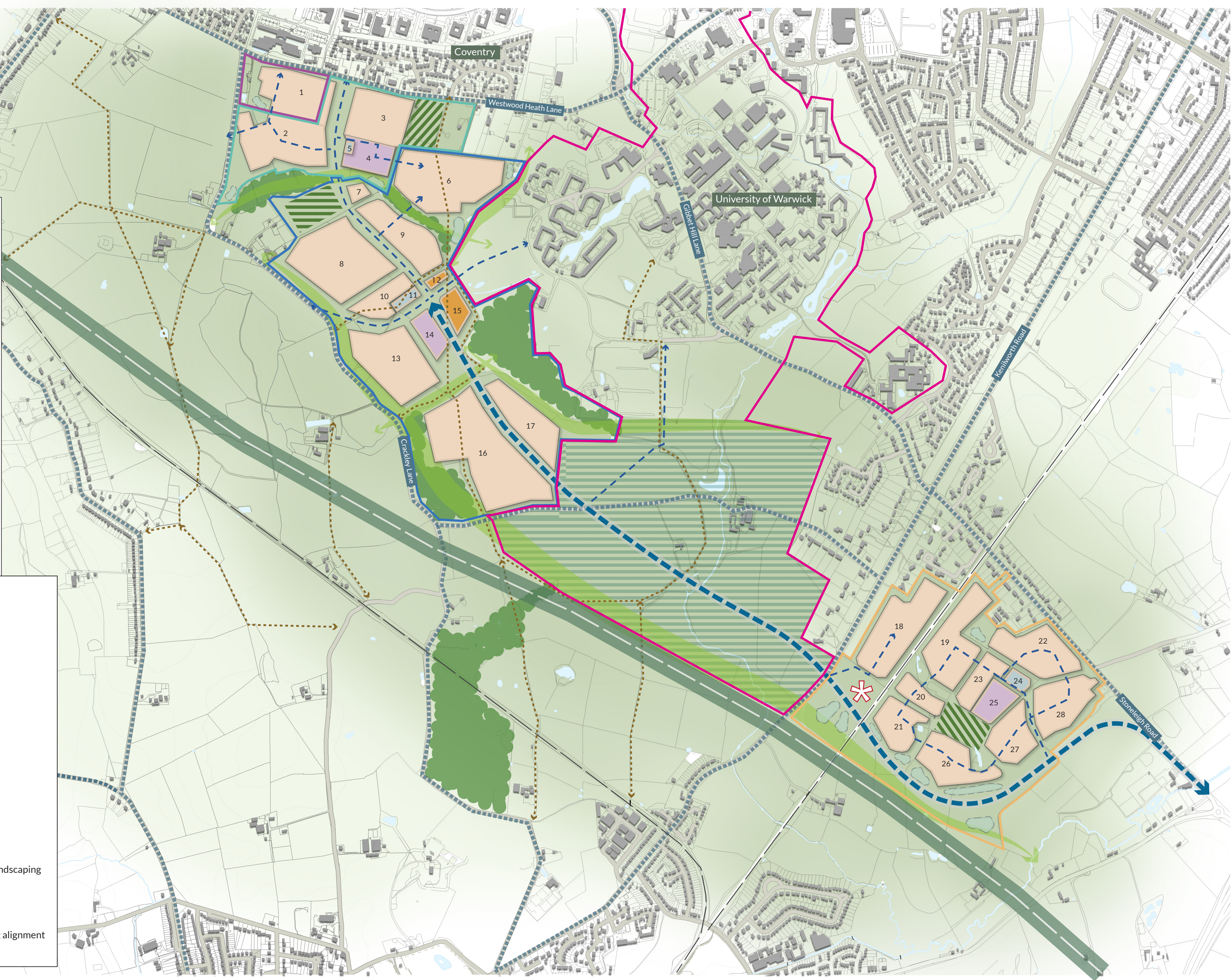
Proposed Green Buffers & Landscaping

Existing Woodland

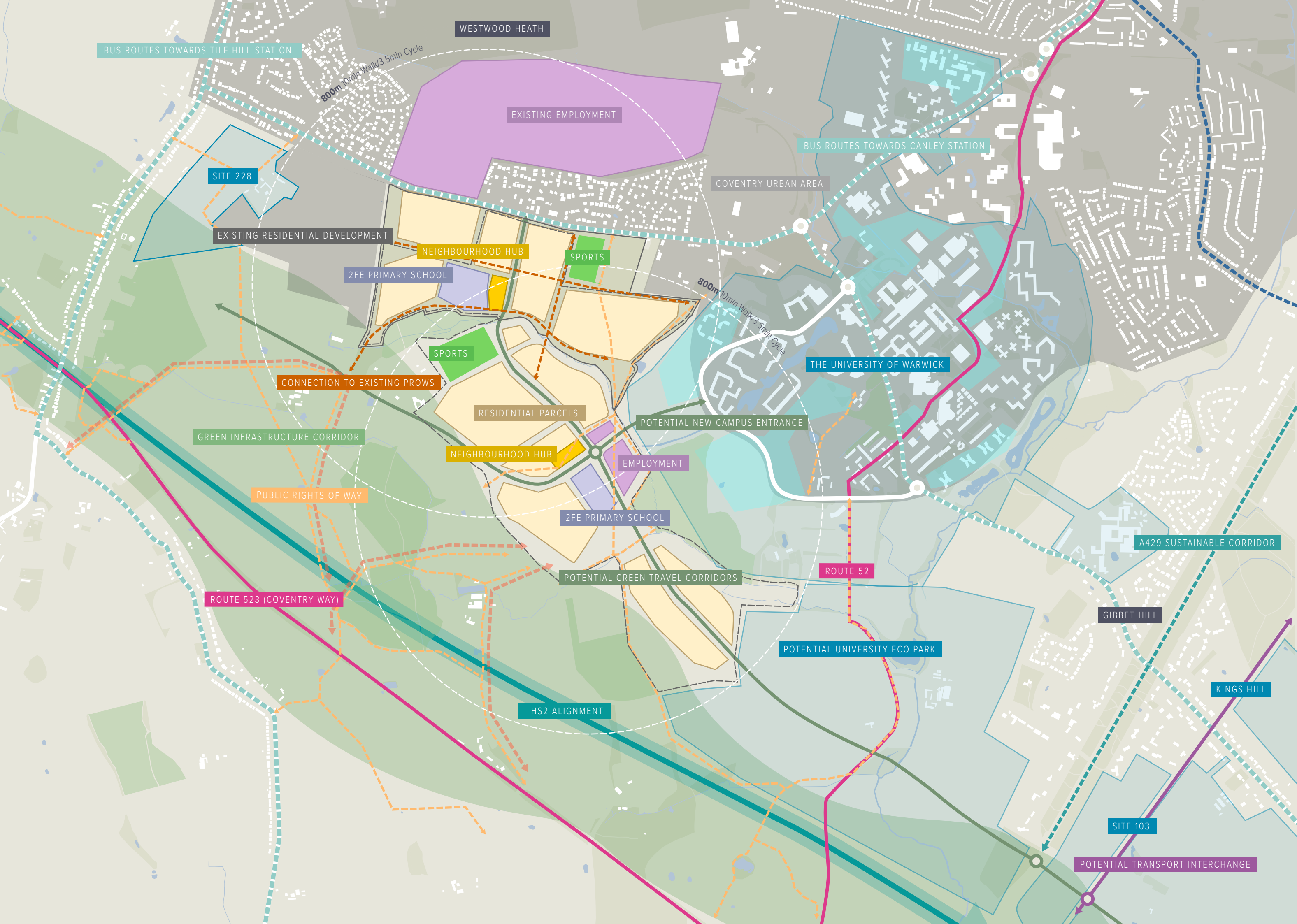
Public Transport Interchange

Railway Lines

HS2 & associated landscaping alignment



Appendix 2 - Conceptual Framework and Location Plan (DE216)



- LEGEND
- Safeguarded Land
 - Land Within CEG's Control
 - Development Sites/Call for Sites'
 - University of Warwick Indicative Proposed Developments
 - Local Wildlife Sites
- Land Use
- Residential
 - 2FE Primary School
 - Neighbourhood Hub
 - Employment
 - Sports
- Movement
- Potential Green Travel Corridors
 - National Cycle Routes
 - Existing Public Rights of Way
 - Proposed Active Travel Connections
 - Existing Bus Routes
 - HS2 Alignment
 - A429 Sustainable Corridor to Coventry
 - Trainline to Coventry
 - Sustainable Corridor to Canley Station
 - Sustainable Transport Opportunities

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

Jack

Last Name

Dickinson

Job Title

Associate

(where relevant)

Organisation

CEG Land Promotion III
(CEG)

Nexus Planning

(where relevant)

Address Line 1

Interchange Place

Line 2

151-165 Edmund Street

Line 3

Birmingham

Line 4

Post Code

B3 2TA

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" value="X"/>
(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" value="X"/>

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 states that provision will be made for a minimum of 29,100 (1,455 per annum) additional dwellings between 2021 and 2041. The supporting text to the policy confirms the housing need figure has been derived from the Coventry and Warwickshire Housing and Economic Development Needs Assessment (“HEDNA”) (2022) and that this was confirmed to be a reliable basis for plan making in the Review of Coventry’s Local Housing Need (June 2024).

The NPPF 2012 introduced a radical shift in relation to the approach to meeting housing needs. This remains in the 2023 version where at paragraph 8 three overarching objectives are outlined to securing sustainable development. Paragraph 8b states that to achieve the ‘social objective’ it is necessary to “*to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations...*”

Paragraph 60 of the NPPF then states that “*To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*”

Despite the additional requirements and objectives imposed by the NPPF, it is widely accepted that there is a national housing crisis due to the consistent failure to achieve the Government's target of 300,000 homes per annum, with affordability unsurprisingly worsening across many parts of the country. Accordingly, it is vital the Local Plan Review sets a positive framework to fully accommodate its housing needs and importantly, address underlying housing market issues.

By relying upon a housing requirement established by the HEDNA, the Council's approach fails to follow the requirements of the December 2023 NPPF which requires use of the Standard Method to establish the starting point for its housing requirement. However, it then leans upon the policy and delivery policy mechanisms available to ensure the City's selected housing requirement is met in full, including through use of a Green Belt review and making of additional housing allocations and declaring an unmet need if needed. CEG does not consider it to be appropriate for the Council to choose to use to comply with some parts of the December 2023 NPPF but disregard others.

The December 2023 NPPF is clear at paragraph 61 that housing need should be calculated using the Government's Standard Method unless there are **exceptional circumstances** (emphasis added) to justify an alternative approach. The HEDNA outlines a rationale for applying a trend-based approach, citing historic issues with calculating demographic projections due to the influence of the student population. Whilst there is a degree of merit to this approach, noting the test of national policy, it is considered that further justification is still required in this regard to meet the bar of 'exceptional' circumstances.

The use of the HEDNA figure does not account for the urban uplift, a requirement of the December 2023 NPPF. Again, there is no justification presented as to what the exceptional circumstances are to justify removal of this 35% uplift to the Standard Method figure. It is important to note that the HEDNA recommends the inclusion of this uplift as part of its assessment of housing need across Coventry and Warwickshire, however this is ignored by the Local Plan Review. Coventry, as the sub-regional centre, should clearly be taking a leading and pro-active role in meeting its identified housing need and to omit the urban uplift against national policy is an unsound approach.

Iceni, the Council's consultants, support a deviation from the 2014 projections but they continue to apply the standard framework method to the revised figures. Having arrived at a revised figure, Iceni continue to apply the other elements of the standard method including, crucially, the application of the urban uplift. This is the approach Iceni have adopted for other studies elsewhere, for example in Birmingham and in Leicester and Leicestershire.

Coventry's suggested approach is contrary to its own evidence base, which includes the 35% uplift. This revised approach appears to attempt to reduce the housing requirement as much as possible without any clear justification as to what exceptional circumstances exist to support this position.

The Council needs to be clear and explicit in the choices it is seeking to make and apply the tests in NPPF to see if it is justified in doing so. Paragraph 35 of the NPPF is explicit in that plans are 'sound' if appropriate strategies are justified, taking into account reasonable alternatives, and based on proportionate evidence. At present, it is strongly suggested the Council's approach is **unsound** as there is no justification for the removal of the urban uplift or deviation from the use of the Standard Method.

The Council state that their housing need will be delivered fully within the Council's administrative area through an urban and brownfield-focused strategy. CEG have serious concerns regarding this approach particularly given the worsening affordability of family housing, the finite supply of land within Coventry and the over-reliance on smaller units and Purpose-Built Student Accommodation (PBSA) to meet the housing requirement, both historically and looking forward.

Housing affordability is an ongoing and increasing pressure which will require a proactive approach to address. Furthermore, when considering Coventry's needs and the type of development that has taken place and is needed in the future, it is critically important that housing is delivered which meets the needs of the whole population.

The 2023/24 Annual Monitoring Report ("AMR") for Coventry indicates that housing delivery is ahead of the overall requirements established in the adopted Local Plan. However, of 1,859 completions 837 (45%) of these were PBSA, compared to 1,022 (55%) residential dwellings. It is clear that Coventry's housing needs are not based upon the provision of over half of new dwellings required to be student accommodation and CEG considers this must be addressed in planning for future delivery.

The 837 (45%) of dwellings delivered as student accommodation were in the form of flats/apartments specifically for student living. This type of housing delivery severely impacts the delivery of affordable housing which has been continually declining throughout the plan period, as PBSA is exempt from affordable housing contributions in Coventry. From a peak of 39% in 2012/13 the general trend for affordable housing completions as a percentage of the overall number has continued to decline with only 9.7% of overall completions being affordable in 2023/24.

The affordable housing need identified in the Table 8.13 of the HEDNA is 1,887 dwellings per annum. When this is compared to the Council's selected housing requirement in the Local Plan Review of 1,455 dwellings per annum, affordable housing need would equate to 129% of the housing requirement using the trend-based projections. The selected housing requirement will quite clearly result in a significant level of unmet affordable housing need that will not be delivered if the Local Plan Review proceeds in its current form.

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 Council should therefore adopt a housing requirement greater than the HEDNA figure. As noted by Planning Practice Guidance; the use of the Standard Method figure to inform the housing requirement will only start to address affordability challenges rather than address them entirely. The Council seeks to rely upon the December 2023 NPPF for the assessment of soundness of the Local Plan Review and so to fail to propose a housing requirement in accordance with the Standard Method associated with that version of the NPPF, the Council's approach is not positively prepared or justified. To rectify this, CEG consider that the Council

should instead adopt a housing requirement at least in accordance with the December 2023 Standard Method plus urban uplift.

The only way to truly address affordability crises' and to seek to eat away at the identified affordable housing need is to plan for the delivery of more housing across the City which will in turn deliver a greater quantum of affordable housing.

The decline in the delivery of affordable housing and the rate of PBSA being delivered within Coventry further confirms the importance of providing the sufficient type and number of dwellings to meet housing need. The December 2023 NPPF states, at paragraph 63:

“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies...”

In Coventry, the importance is reinforced when looking at the needs for different house types within the HEDNA. The type of accommodation needed within Coventry is closely aligned with that required within Warwick and Stratford-On-Avon Districts and shows a clear need for family-sized market accommodation i.e. 3-bedroom houses (40%).

Local Authority	Tenure	1 Bedroom	2 Bedroom	3 Bedroom	4+ Bedroom
Coventry	Social / Affordable Rent	30%	35%	25%	10%
	Affordable Home Ownership	20%	45%	25%	10%
	Market Housing	10%	40%	40%	10%
Warwick	Social / Affordable Rent	40%	35%	20%	5%
	Affordable Home Ownership	20%	45%	25%	10%
	Market Housing	10%	40%	40%	10%
Stratford-on-Avon	Social / Affordable Rent	40%	35%	20%	5%
	Affordable Home Ownership	20%	45%	25%	10%
	Market Housing	10%	35%	40%	15%

Given the finite supply of land within Coventry and the recent trends towards the delivery of smaller units and PBSA, there is a clear need to ensure that allocations are made that can provide for a range of house types, in particular family-sized accommodation. This is crucial to help meet Coventry's housing needs and the Local Plan Review's intent to deliver the housing

requirement entirely within Coventry's boundaries is likely to further constrain the type of housing that can viably and feasibly be delivered in the City.

It is therefore clear that Coventry must work with its neighbours to find suitable land for the delivery of family housing to ensure that the needs for housing for all parts of the community are satisfied, in line with paragraph 63 of the December 2023 NPPF. This issue cannot simply be deferred until the next local plan review as the shortfall will continue to compound and worsen in years to come – it is critical that this issue is addressed head-on by the Local Plan Review.

For the reasons set out above, CEG consider that the plan's failure to justify deviation from the standard method, failure to plan for the urban uplift and to plan proactively for the type of housing that is required means that Policy DS1 is not effective, nor positively prepared and is therefore **unsound**. Whether against the selected housing requirement or an uplifted requirement as dictated by the December 2023 NPPF, suitable sites capable of delivering family housing, such as Westwood Heath, need to be identified and their delivery supported. This requires working collaboratively with neighbouring authorities such as Warwick District Council now under the Duty to Cooperate given the scarcity of suitable land within Coventry.

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

4.28

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)

☒

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 ensure that matters raised in relation to housing requirement, safeguarded land and Duty to Cooperate are considered.

(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.

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.

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.

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

Jack

Last Name

Dickinson

Job Title

Associate

(where relevant)

Organisation

CEG Land Promotion III
(CEG)

Nexus Planning

(where relevant)

Address Line 1

Interchange Place

Line 2

151-165 Edmund Street

Line 3

Birmingham

Line 4

Post Code

B3 2TA

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" value="X"/>
(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" value="X"/>

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.

CEG strongly **object** to the approach of Policy H1 as it is **unsound** as set out below.

As already outlined in the response to Policy DS1, CEG object to the Council's proposed housing requirement.

CEG also consider that the Council will need to work with neighbouring authorities through the duty to cooperate to meet both its overall need, assuming this is uplifted to include the 35% urban uplift, and to meet the demand for different types of housing unlikely to be delivered within Coventry's boundaries. In this regard, the Council should support development at the safeguarded land within the Warwick District Local Plan (Policy DS21 – S1) which is adjacent to the safeguarded land in the Coventry Local Plan (Policy GB2), under the Duty to Cooperate.

CEG are also promoting wider land holdings to the South of Coventry, adjacent to the safeguarded land, which offers a wider opportunity to accommodate Coventry's housing need in a sustainable location that has a strong spatial relationship with the city. The site is being promoted by CEG for development as part of the South Warwickshire Local Plan ("SWLP") and has been confirmed as suitable for development and also identified as a Spatial Growth Option in the Preferred Options consultation document.

Coventry, through the duty to cooperate, should support development of the safeguarded land (Policy DS21-S1 of the Warwick District Local Plan) at Westwood Heath and a spatial strategy that seeks to direct wider housing growth to the south of Coventry. Further details of the safeguarded land and the wider land to the south of it, described collectively as “the site” is provided below.

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.

Policy Context

Policy DS20 ‘Directions for Growth South of Coventry’ of the WDLP acknowledges the transformational change that could occur in the area and commits Warwick District Council (WDC) to an early partial review within five years of the date of adoption of the plan (Summer 2022). The policy is clear that this will allow the Council to address any additional evidence regarding the need and potential for development in this area and in particular to ascertain whether necessary infrastructure has become available to allow safeguarded land to be brought forward to meet local housing need.

The Coventry City Local Plan (the subject of this review) similarly safeguarded an area of land south of Westwood Heath Road (Policy GB2) which would be released upon a review of the plan and clarity on development proposals within Warwick District.

Having regard to the above, WDC subsequently commenced preparation of a wider south of Coventry masterplan framework, which is now in progress.

Sustainable Location

The site benefits from easy access to a range of services and facilities. It is not subject to any landscape designations, it is located within Flood Zone 1 and does not contain any designated heritage assets.

Whilst situated wholly within the Green Belt, circa 30 ha of the site is identified as safeguarded land (to meet longer term strategic development needs) through Policy DS21 of the WLP. Part of the site is located adjacent to and south of the Westwood Heath Road and would form a natural extension to the existing residential area. It benefits from having direct frontage along the Westwood Heath Road thus enabling a new junction to be accommodated to access the development.

A number of local facilities including the Westwood Academy Secondary School, recreational pitches, a Sport and Wellness Hub, and convenience food stores are in the immediate vicinity of the site. Tile Hill station (offering connections to Birmingham and London) is 1.4km away and Coventry City Centre is 6.4km and is accessible by Bus and Cycle. Local bus stops are within a comfortable walking distance from the site along within the University of Warwick’s main campus making public transport a genuine option for travel.

The site benefits from excellent pedestrian infrastructure with continuous footways on the North side of Westwood Heath Road which can be enhanced. Similarly, the proximity to the campus will facilitate access to existing cycle infrastructure and this will be integrated with the green travel corridor providing links into Coventry and across the area. This corridor also has the potential to integrate with wider connections to the HS2 interchange at Arden Cross. The site is therefore in a highly sustainable position that benefits from excellent public transport linkages.

Development in this location would provide a significant level of market and affordable housing and supporting community infrastructure. It would also help facilitate the delivery and provide financial contributions towards a green-travel corridor which would facilitate an improved southern access to The University of Warwick. These infrastructure improvements will align with the significant transport improvements already being implemented in the area, including the improvements at the A46 Stoneleigh Junction and the new crossing of the A45, which would, in its own right, deliver significant social and economic benefits locally and at the sub-regional level. Our proposals would also align with the opportunities identified by WDC through the planned preparation of a wider south of Coventry masterplan.

At this stage, a 'Conceptual Framework' is provided (enclosed to these representations) to outline how development of Westwood Heath could sustainably be delivered across land ownerships. This demonstrates that the site can address site specific considerations, comprising the following development within CEG's control:

- Circa 2,500 market and affordable dwellings of a type that will make a significant contribution to specific housing needs, divided as follows:
 - Circa 650 within the safeguarded land; and
 - Circa 1,850 dwellings within wider land.
- Employment/commercial development in a strategic location to offer collaboration opportunities between business and the university;
- Significant community infrastructure provision including a neighbourhood centre, a 2 FE primary school, sports pitches, public parkland and biodiversity parkland;
- A substantial network of green infrastructure with green corridors that will provide opportunities for sustainable travel and recreation. This will build upon a local neighbourhood concept;
- New movement corridors to help address existing traffic and associated environmental issues within Coventry and aligning with ongoing infrastructure improvements in the area, improving access to the University with the potential to facilitate access to the HS2 interchange at Arden Cross;
- Ensuring development avoids coalescence between settlements through keeping development to the North of HS2; and
- Strong connectivity to Coventry and the University of Warwick's main campus, supporting its role as a Major Investment Site

Overall, the proposals represent a highly sustainable option growth option that can deliver a range of substantial benefits.

Whilst it will be a matter for the SWLP to comprehensively consider the substantial benefits that can be delivered through large scale growth at Westwood Heath through a strategic growth corridor, it is considered that there will be substantial benefits to Coventry City through

development in this location. Whilst this will be a matter for the Duty to Cooperate it is noted that paragraph 11a of the NPPF states that plans should positively seek opportunities to meet the development needs of their area. Therefore, it is considered that this local plan review should reaffirm Coventry City Council's support for growth south of Coventry, specifically at Westwood Heath.

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

5.1 onwards

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)

☒

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 ensure that matters raised in relation to housing requirement, safeguarded land and Duty to Cooperate are considered.

(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.

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

Jack

Last Name

Dickinson

Job Title

Associate

(where relevant)

Organisation

CEG Land Promotion III
(CEG)

Nexus Planning

(where relevant)

Address Line 1

Interchange Place

Line 2

151-165 Edmund Street

Line 3

Birmingham

Line 4

Post Code

B3 2TA

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" value="X"/>
(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" value="X"/>

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.

CEG **object** to the approach of Policy H1 as it is **unsound** as set out below and consider that it could only be made sound through the amendments proposed to policy in this representation.

CEG are pleased to see that Policy DS2 contains support and recognition for proposed residential development south of the city's administrative boundary. The Duty to Cooperate plays a crucial part of the plan-making process, especially in Coventry where they will need to work with neighbouring authorities meet their housing requirements, particularly affordable housing and family sized accommodation.

When plan making, Paragraph 35a of the NPPF (December 2023) states plans should be positively prepared so that that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. In fulfilling its statutory Duty to Cooperate, the Council should readily be willing to work with adjacent authorities to address its unmet housing needs. The safeguarded land at Westwood Heath (Policy DS21 – S1 of the WDLP) and the wider opportunities to the south of this safeguarded land are both sustainably located and would present a significant opportunity to assist with meeting Coventry's unmet housing need.

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.

It is CEG's view that Policy DS2 should be further strengthened to provide a clear commitment to work collaboratively with neighbouring authorities on key areas of strategic growth, such as South Warwickshire regarding land at Westwood Heath. For this reason, it is recommended that to ensure this policy is effective and positively prepared that Policy DS2 should be amended to the following (additions **underlined in bold**):

1. *"Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.*
2. *In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.*
3. *The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.*
4. *Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, Supplementary Planning Documents (SPD) and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.*
5. *Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.*
6. *Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub-regional economy:*
 - a. *Jaguar Land Rover at Whitley;*
 - b. *The University of Warwick;*
 - c. *The wider Coventry Gateway proposals;*
 - d. *Ansty Park;*
 - e. *Pro-Logis Park at Keresley; and*
 - f. *Proposed residential developments to the south of the city's administrative boundary, including:*
Land at Westwood Heath within Warwick District Council's administrative boundary.

7. *The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire.”*

CEG are pleased to see that a Duty to Cooperate Statement has been published. However, in order to comply with the Duty to Cooperate, the Council needs to demonstrate that it has, and remains, in proactive engagement with other local authorities within the sub-region around the issue of the housing and employment requirements. CEG are aware, for example, that the examination of the Shropshire Local Plan has faced significant delays and is likely to be either withdrawn or found unsound due to, amongst other matters, a lack of clarity and information on the cross-boundary cooperation with neighbouring authorities. In this regard, it is considered that further information, such as Statements of Common Ground, which demonstrate engagement between the plan-making Council and neighbouring authorities should be made available ahead of the plan’s submission for examination.

The scale of the changes proposed by the Local Plan Review such as departing from the standard method and opting not to apply the urban uplift is likely to have significant knock-on effects for plan-making within neighbouring authorities. The issue of potential unmet need requires clearly evidenced and ongoing cooperation. Ongoing work will still be needed as the Plan progresses including as part of the Examination in Public. Notwithstanding this, the Plan makes no mention of an update to the Memorandum of Understanding ¹which needs to be carried out given it relates to the planned distribution of housing within the Coventry & Warwickshire Housing Market Area and updated in light of emerging local plans throughout the sub-region.

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

¹ Between Coventry City, Rugby Borough, Warwick District, North Warwickshire Borough, Stratford on Avon District and Nuneaton and Bedworth Borough

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:

To ensure that matters raised in relation to housing requirement, safeguarded land and Duty to Cooperate are considered.

(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.

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

Jack

Last Name

Dickinson

Job Title

Associate

(where relevant)

Organisation

CEG Land Promotion III
(CEG)

Nexus Planning

(where relevant)

Address Line 1

Interchange Place

Line 2

151-165 Edmund Street

Line 3

Birmingham

Line 4

Post Code

B3 2TA

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" value="X"/>
(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" value="X"/>

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.

CEG strongly **object** to the approach of Policy H1 as it is **unsound** as set out below.

Coventry has a finite supply of land within its administrative area and recent delivery has relied upon creation of significant numbers of flats/apartments and PBSA. Coventry is also constrained by tightly drawn boundaries and is considered to have insufficient capacity when it comes to delivering family housing and consequently affordable housing which its own evidence confirms is acutely needed.

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.

Consequently, to ensure that its needs are met, Coventry City Council should be endorsing locations that are well-related and connected to the City as sustainable locations for growth. With this in mind, the Council should be clearly recognising the opportunity for growth at Westwood Heath and proactively seeking that Warwick District Council bring forward

development of the safeguarded land and the wider site under CEG's control, as a spatial growth option.

Relevant to the Site at Westwood Heath, Policy GB2 states that “Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District and progress on the South Warwickshire Development Plan”. Whilst this statement is agreed in principle, Coventry should be supporting spatial growth to the South of Coventry to address their housing requirements and worsening affordable housing issue. Both through the Duty to Cooperate and in the Local Plan Review, Coventry should be providing a mandate for WDC to make these critical decisions now, proactively seeking to address issues of affordability and housing type/mix which have manifested in the City.

It should also be noted that in the WDLP that policy DS21 establishes the principle of safeguarded land being released to meet longer-term strategic development needs. Policy DS20 also clearly identifies the broader area South of Coventry as an area of growth and in response to this, WDC gave Cabinet approval in April 2022 for the preparation of a wider south of Coventry masterplan.

This confirms the importance of the Councils working collaboratively, as this masterplan area extends from Westwood Heath and eastwards to Coventry Airport; representing a significant area and opportunity to the south and south east of Coventry. Finally, the site is located in close proximity Coventry and to the University of Warwick's main campus, which is identified as a Major Investment Site.

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)

☒

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 ensure that matters raised in relation to housing requirement, safeguarded land and Duty to Cooperate are considered.

(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.