

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	<div>Mr</div>	<div></div>
First Name	<div>Tim</div>	<div></div>
Last Name	<div>Brown</div>	<div></div>
Job Title	<div>Committee Member</div>	<div></div>
(where relevant)		
The	<div>Coventry Society</div>	<div></div>
(where relevant)		
Address Line 1	<div></div>	<div></div>
Line 2		<div></div>
Line 3		<div></div>
Line 4		<div></div>
Post Code		<div></div>
Telephone Number		<div></div>
E-mail Address		<div></div>

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

6.43	–	6.47
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 Policy

Policy H.10 Student Accommodation

4. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

1. Introduction

Our interest centres mainly on the impact of an oversupply of purpose built student accommodation (PBSA).

We welcome the debate generated by the Regulation 18 and Regulation 19 consultations. In particular, we acknowledge the Council's recognition that the student housing market has changed considerably since 2016/17 when the current Local Plan was drawn up and approved.

We also recognise the usefulness of the independent report on student accommodation by Cushman & Wakefield in 2024.

2. Student Housing Provision

2.1. *Current position*

Our key point is that there is an oversupply of PBSA primarily in the city centre.

According to Cushman and Wakefield, there were in 2023/24, nearly 25,600 PBSA units (with a further 2,970 units in the development pipeline in March 2024).

Oversupply has been highlighted for a number of years e.g.

- Higher Education Policy Institute (HEPI) identified in August 2023 that “in Coventry there will be an extra 1,136 beds in 2023/24 in a market that already has a surplus estimated at 6,000”¹ and the HEPI update in February 2024 repeated that for 2023/24 Coventry is “over-supplied” and that Coventry University will be downsizing by 30 per cent²
- By February 2025, we are aware of at least six recent requests / planning applications by PBSA owners and managers to vary planning permissions by, for instance, a more flexible use to include serviced short-term accommodation
- In the case of an application for Axo Student Living Scheme in Paradise Place, the supporting planning statement indicated that the vacancy rate in 2023/24 was 37% (i.e. 658 units occupied and 382 rooms vacant)
- A further example is Manor Park Court where Erec Estates have applied for a change of use for three years of all 79 units for flexible short-term residential use – the application states that occupancy by students is low and not at a sustainable level
- Cushman & Wakefield's independent report summary (paragraphs 1.16 – 1.18) provides further information on the impact of over-supply on the behaviour of providers e.g. discounting of rents such as cashback at the time of bookings, free bus passes to Warwick University, referral payments, and group booking discounts.

2.2. *Future prospects*

¹ See [Accommodation shortages: are the odds stacked against students? - HEPI](#).

² See [Student-Accommodation-The-State-of-the-Nation-in-2024.pdf](#) p6. This report also noted that “Coventry University has announced the need to make £100 million of savings over the next two years, downsizing the university by about 30%” page 3.

Cushman & Wakefield use student to bed ratios to assess current and future prospects. Their evidence is summarised below:

	Local student to bed ratio	Nationally observed student to bed ratio	Comment
2021/22	1.7:1	2.12:1	Nationally observed ratio is assumed to be a satisfactory market figure
2030/31	1.46:1		Assumption of no increase in student numbers and development pipeline schemes are completed
	1.65:1		As above but no development pipeline schemes are completed

These two scenarios for 2030/31 indicate that there will still be oversupply issues.

They, in addition, suggest that there are two sub-markets – Coventry City Centre / Coventry University and Warwick University. The data suggests that Warwick University is under-supplied with a local student to bed ratio in 2021/22 of 2.6:1 and forecasts for 2030/31 of between 2.5:1 and 2.01:1 depending on assumptions made. In the case of Coventry City Centre / Coventry University, the 2021/22 local student to bed ratio was only 1.2:1, while by 2030/31 the ratio range is forecasted to be between 1.1:1 and 1.5:1.

Their conclusion is that there is scope for additional development at the University of Warwick but there will continue to be a surplus in the city centre.

However, as Cushman & Wakefield point out elsewhere in their report, PBSA providers are providing incentives for Warwick University-based students to locate in the city centre, and there is evidence that students may favour the additional facilities and services in a central location (which was discussed during the University of Warwick SPD consultation in summer 2024).

Therefore, we believe that caution is needed in assuming that there are two separate sub-markets.

3. Our View

Our overall concern is the impact of an oversupply of PBSA.

Firstly, oversupply is resulting in under-occupation of existing schemes leading to providers requesting a change of use to a more flexible approach serviced short-term accommodation. However, little or no evidence is supplied to show that there is a demand / need for such accommodation. Local plan policies should, therefore, require robust evidence to assess such requests.

Secondly, given the scale of over-supply and the existing and future high vacancy rates on some existing PBSA schemes, the local plan should encourage their reuse / redevelopment for other residential uses subject to evidence that there is a demand /

need. The draft local plan makes reference, for example, to build for rent and co-living (see policies H.12 and H.13). Furthermore, without such actions, a likely scenario is that some schemes will be mothballed and the physical fabric will deteriorate leading to a worsening of the townscape and built environment.

An additional benefit of reuse/redevelopment is that this will encourage tenure diversification (especially in the city centre where residential accommodation is dominated by student housing). Diversification of tenure is a theme within the proposed housing policies in the local plan.

Thirdly, we believe that the monitor and manage approach is inappropriate given the scale of over-supply³. A pro-active stance is required to tackle existing over-supply and prevent further PBSA units being developed unless there are exceptional reasons such as the replacement of poorly designed and low quality accommodation with better quality provision. We also therefore recommend the deletion in appendix 8 of the monitoring statement for policy H.10.

Fourthly, in relation to the Warwick University 'sub-market, we have already expressed our concern over the use of this term. We, nevertheless, acknowledge that the University has a robust plan for growth as evidenced by our involvement as a consultee in the University of Warwick SPD during 2024.

However, we believe that some existing and possible future PBSA schemes (which are referred to in the SPD as on the 'collar of the campus' but with unfortunately no definition of this term) are inappropriate e.g.

- Conversion and / or redevelopment of sites on Westwood Business Park when the Local Plan highlights the shortage of land for business and industrial uses⁴
- Schemes on and around the A45 Fletchamstead Highway (such as Burnsall Road) which are poorly located for the University of Warwick.

We also are sceptical whether there are other suitable sites on the 'collar of the campus' that might become available without impacting negatively on existing uses such as residential neighbourhoods.

Furthermore, the University of Warwick SPD section on residential accommodation states that there are a "number of locations within the SPD boundary where student residences could be considered". We suggest that this presents an opportunity for the University to collaborate with PBSA developers on potential schemes. An example of this would be the redevelopment at higher density of residential accommodation on the Westwood Campus part of the University of Warwick site.

(Continue on a separate sheet /expand box if necessary)

³ We would add that there is a lack of detail in the proposed local plan on what constitutes 'monitor and manage' approach.

⁴ We recognise that in policy JE2, Westwood Business Park is not designated as a key employment site and therefore policy JE3 applies (non-employment uses on employment land). Nevertheless we would argue that with a deficiency of 40 ha of employment land it is essential to protect employment sites such as Westwood Business Park.

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.

4. Policy H.10

We support policies H.10.3, H.10.6, and H.10.7. However, we suggest that policies 10.1, 10.2, 10.4, 10.5 and 10.8 require reworking.

Policy No.	Policy	Our Comments	Policy Suggestion
H.10.1	PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus, unless exceptional circumstances demonstrate otherwise	The policy is not sufficiently specific. There is no definition of 'immediately adjacent'. 'Exceptional circumstances' are not defined	PBSA development must be located within the University of Warwick Campus or the Education and Enterprise area of the City Centre (as defined in policy CC1 (part E)). Proposals must be accompanied by evidence of need for additional student accommodation and support from the universities in the form of a nominations agreement.
H.10.2	PBSA proposed outside of the areas identified in point 1, whether new build or conversions, will be delivered in line with the Council's PBSA monitor and manage approach and will only be considered where a. the PBSA monitor and manage approach demonstrates evidence of need for additional student accommodation: or there is support from one of the city's universities that evidences a	Given the over-supply of PBSA, a monitor and manage approach is inappropriate. We believe that proposals outside our suggested areas in H.10.1 should normally not be supported	PBSA proposed outside of the areas identified in H.10.1 will not normally be supported, unless exceptional circumstances apply. These include a replacement for an existing PBSA that is unsuitable because of design and layout, or because the site of an existing PBSA

	need for additional student accommodation.		is required for other university uses
H.10.4	Developments that comprise a predominant studio ratio will be considered in line with the most up-to-date evidence available	Clarity required on 'predominantly studio ratio' and 'predominantly cluster units of no more than 8 units' We suggest the use of nationally recognised room types and building configuration	PBSA proposals should comprise ensuite accommodation in a cluster of no more than 8 individual rooms / units. Ensuite accommodation should comprise either an in-room bathroom and shared kitchen or studios with an in-room kitchen and bathroom.
H.10.5	Proposals should comprise predominantly cluster units of no more than 8 units per cluster		
H.10.8	Where a change of use is proposed to part of an existing student accommodation block to another residential use, the residential use must be self-contained and segmented from the student accommodation	We do not believe that the proposed policy meets the scale of the issue of oversupply and likely proposals for short-term serviced accommodation	Proposals for change of use of part of an existing PBSA scheme to another residential use must (a) demonstrate that there is a demand for such a use, (b) the new residential use must be self-contained and segregated from the student accommodation Proposals for the conversion or redevelopment of difficult-to-let PBSA schemes to another residential use will be supported, but evidence must be submitted that there is a demand for the new residential use

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your

suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

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

☒

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:

10. Tackling the over-supply of purpose-built student accommodation (PBSA) is a major issue affecting the city

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.