

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/planningpolicyprivacynote

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	CAMPAIGN TO PROTECT RURAL ENGLAND WARWICKSHIRE	Mr
First Name		Mark
Last Name		Sullivan
Job Title		
(where relevant)		
Organisation	CAMPAIGN TO PROTECT RURAL ENGLAND (WARWICKSHIRE)	
(where relevant)		
Address Line 1		41A Smith Street
Line 2		Warwick
Line 3		
Line 4		
Post Code		CV34 4JA
Telephone Number		

E-mail Address

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Part B – Please use a separate sheet for each representation

Name or Organisation: C P R E WARWICKSHIRE

4. To which part of the Local Plan Review does this representation relate?

Paragraph Policy

5. Do you consider the Local Plan Review is:

	Yes	No
(1) Legally compliant		
(2) Sound	Yes	No
(3) Complies with the Duty to co-operate	Yes	No

Please tick as appropriate.

6. 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 DS2 Duty to Co-operate and partnership working

Policy DS2(1) states:

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.

There is a surplus of supply of housing land in the City. Table 6.1 *Components of Housing Supply 2021-2041* states that supply is 31,493. This is a surplus of 3,730 against the Housing Need that the NSM projects for

Coventry (27,760). If the HEDNA housing need projection is used, there is also a surplus, of 2,850. Para 6.10 of the Plan states

2025 Scale of Housing Development...

6.10 The HEDNA identifies a local housing need of 1,455 per annum over the plan period, 29,100 in total. Following a thorough consideration of sustainable development principles and in accordance with the NPPF, an assessment of land options through the Call for Sites and the HELAA and a density study informing a strategy of increased densification a capacity of around 31,954 homes has been identified, which provides a degree of flexibility above the local need figure of 29,100."

Detailed assessment for Keep Our Green Belt Green (KOGG) shows that supply is significantly underestimated. Densities are likely to be higher, windfalls are underestimated by 50%, and the supply of student accommodation (PBSA) is underestimated. The windfall allowance in Table 6.1 should be adjusted from 2,800 to 5,600 and windfall from PBSA development of 1,400 should be added.

The total supply should be given as 35,693 in the Plan Period (2021-2041).

Coventry's Local Plan has a potential surplus of 7,933 homes. The Plan will have capacity for 35,693 homes and a need under the NSM of 27,760.

Some sites in the Plan which are damaging and do not have any planning permission should be de-allocated, in Keresley Parish (Proposal H2.1 Keresley SUE). This could reduce the surplus by @1,000.

The Warwickshire Districts have a housing requirement which is above their supply (notably the South Warwickshire Plan, and Rugby). Coventry can provide for some of the housing numbers specified for them in the NSM.

Policy DS2 should be amended to state that

Coventry City Council will work with neighbouring authorities within its Housing Market Area to provide for some of the housing needs of those authorities where they have a requirement higher than their land supply while Coventry has housing land supply in

excess of the requirement set by both the HEDNA and the Dec 2024 NSM.

The report 'Coventry Plan: Housing' (February 2025) by Gerald Kells is attached.

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

7. 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 DS2 should be amended to state that

Coventry City Council will work with neighbouring authorities within its Housing Market Area to provide for some of the housing needs of those authorities where they have a requirement higher than their land supply while Coventry has housing land supply in excess of the requirement set by both the HEDNA and the Dec 2024 NSM.

(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.

8. 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)

9. 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.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To fully explain why the policy/text is not sound, to respond to the Inspector's matters and questions, to reply to the local planning authority's case, and if necessary to address or comment on the Examination statements of other parties.

(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.