

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	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

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.

Section 6
Housing requirement
Policy H1

The Plan applies the output from the HEDNA (2022) and proposes Local Housing Need for Coventry for the period 2021-2041 as 29,100 houses (1,455 per annum). The HEDNA covers Coventry and the five Districts of Warwickshire. However, for the Warwickshire Districts notably Warwick and Stratford-upon-Avon, which are at Reg.18 stage, new (Dec 2024) NPPF policy requires the use of annual housing numbers using the new standard methodology (‘NSM’) which are on a different basis.

This is all the more justified because the differences between old Standard Method (SM) and the NSM balance Coventry against the 5 Districts closely:

Dwellings per annum (DPA)

Coventry 1694	old SM: 3082	NSM: 1388	-
Warwickshire (all 5 Districts)	old SM: 2315	NSM: 3907	+1592

The HEDNA and the supplementary Review of Coventry's Housing Need (June 2024) conclude that the annual housing requirement for Coventry is 1455 houses (para 3.9). This is very similar to the NSM's target (1388). There is joint working on housing requirements between Coventry and the Warwickshire Districts and the Duty to Cooperate requires this. Using two different methodologies for the one Housing Market Area and sub-region is not justified.

The housing need for Coventry should be 1,388 dpa; for the Plan Period 27,760 dwellings (not 29,100).

Housing supply

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).

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 is thus 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. About 7,000 houses to meet the needs of adjacent Districts can be delivered on the land that is not required for Coventry's needs.

Policy H1 should be amended to state:

Policy H1: Housing Land Requirements

1. Provision will be made for 27,760 additional dwellings between 2021 and 2041.
2. Some of the housing requirements of the adjacent Districts in the Housing Market Area will be met from the surplus of housing land supply in the Plan. This will be agreed with the adjacent authorities.
3.

The report to Keep Our Green Belt Green 'Coventry Plan: Housing' (February 2025) gives full details in support of this proposed change to Policy H1.

Confirmation of supply in excess of requirement using HEDNA Housing requirement

Even using the HEDNA projected annual housing requirement of 1455 dpa and 29,100 homes in the Plan Period 2021-2041, there is a housing land supply surplus of 2,850. This is stated in the Reg.19 Plan at p44, para 6.10:

2025Scale??of??Housing??Development

6.9

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."

(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 H1 should be amended to state:

Policy H1: Housing Land Requirements

1. Provision will be made for 27,760 additional dwellings between 2021 and 2041.
2. Some of the housing requirements of the adjacent Districts in the Housing Market Area will be met from the surplus of housing land supply in the Plan. This will be agreed with the adjacent authorities.
3.

(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

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.