



Ref:

## Coventry Local Plan Review Regulation 19

Proposed Submission (Publication) Stage  
Representation Form  
(guidance note below)

**(For official use only)**

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**Name of the  
Plan to which  
this  
representation  
relates:**

**Coventry Local Plan Review – Regulation 19 Proposed  
Submission (Publication)**

**Please return to Coventry City Council in writing or electronically by 23:59 03  
March 2025** email to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), via our consultation portal  
<https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy  
Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:  
[www.coventry.gov.uk/planningpolicyprivacynotice](http://www.coventry.gov.uk/planningpolicyprivacynotice)

Please also note that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s).

**Please fill in a separate sheet for each representation you wish to make.**

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## Part A

### 1. Personal Details\*

*\*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.*

### 2. Agent's Details (if applicable)

Title

Mrs

First Name

Elizabeth

Last Name

Boden

Job Title

Historic Environment  
Planning Adviser

(where relevant)

Organisation

Historic England

(where relevant)

Address Line 1

Midlands Regions Group

Line 2

The Foundry

Line 3

82 Granville Street

Line 4

Birmingham

Post Code

B1 2LH

Telephone Number

E-mail Address

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

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Name or Organisation:

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

Paragraph	Table 6.2 Site Allocations for Housing	Policy	H2 Site H2:30
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4. Do you consider the Local Plan Review is:

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

**Policy H2: Housing Allocations Site H2:30 Whitefriars Street Car Park**

Historic England (HE) has previously advised, in our response to the Coventry Local Plan Review Regulation 18 consultation), that the Plan should be accompanied by heritage assessments for the proposed site allocations to assess the impact of development on the significance of designated and non-designated heritage assets and their settings. To ensure that plans are positively prepared Historic England advises undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3):

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

At the Regulation 18 consultation stage we also recommended that detailed Heritage Impact Assessments (HIAs) are prepared, either by, or on behalf of, the Local Authority, with reference to Historic England's Advice Note 3 The Historic

Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3): <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

In terms of the evidence accompanying the Regulation19 Proposed Submission Plan, the November 2024 'Design and Heritage Background Paper' is welcomed. HE notes that this sets out the rationale behind the Plan's policies on design and heritage but does not specifically address any assessments in relation to the historic environment for the proposed site allocations.

HE notes that the 'Housing and Employment Land Availability Assessment' (HELAA), November 2024, includes individual site assessments, which take into account the '*Major Planning Considerations*' of Conservation Areas and '*identified*' heritage assets and also '*Other planning considerations*' including '*Built Environment and Heritage*'. We particularly note that the methodology for the assessments encompass under '*Heritage Assets*', that:

*'Sites likely to affect an identified heritage asset are normally deemed unsuitable due to the unknown impact of the development. The presence of a heritage asset does not always prevent development, but the type and nature of the constraint would need to be addressed and mitigated before the site could be deemed suitable for development' & that the 'Solution' given is that 'A Heritage Impact Assessment would be required, prepared in consultation with relevant agencies, to assess the potential impact of any future development'.*

In relation to the proposed site allocation H2:30 Whitefriars Street Car Park, Coventry, HE considers that residential development has the potential to cause harm to important archaeological remains that contribute to the significance of the designated heritage assets of the Carmelite Friary (Whitefriars). We strongly suggest that further work be undertaken in respect of the historic environment to assess whether the level of development sought at the site could be achieved whilst minimising harm to the historic environment.

HE notes that in the HELAA assessment of proposed site allocation H2:30 (Site Ref: STM-012-24, HELAA p.89) the '*constraints*' of the site are identified as being situated within the Archaeological Constraint Area and that the site sits within the View Cone 7: Parkside, as defined in the '*Tall Buildings Design Guide and Three Spires View Management Framework SPD*', with the '*Narrative*' of the HELAA stipulating that '*any proposal should consider the above when assessing scale and massing*'.

However, HE notes that the Plan gives an estimated capacity for the site of 185 units, with the HELAA advising that the '*site is likely to lend itself to high rise development which may achieve more than the policy minimum (150), subject to the necessary planning requirements such as amenity space and access*', with the '*assessed capacity based on similar developments within the City Centre area*'.

Despite the assessment in the HELAA, HE considers that there is no meaningful assessment in relation to the significance of, and likely impact of the development on the significance of, the setting of designated and non-designated heritage assets

and it has not been possible to locate any other evaluation of impact within the consultation information.

The proposed allocation lies between the Grade II\* listed Whitefriars Gate and the main core of monastic buildings around the Grade I listed Whitefriars Museum. Whitefriars Gate formed the western edge of the outer precinct of the priory.

The north edge, picked up in excavations in 2013, was on the north side of Whitefriars Lane (<https://ulasnews.com/2014/12/08/medieval-coventry-revealed-in-citys-heatmap-project/>) and the precinct would have extended down to the historical route of London Road (now under the flyover). The area comprised housing with gardens and backcourts prior to and after WWII and then looks to have been successively cleared to form the current car park and park; therefore, preservation of archaeological remains should be reasonable. It is likely that the proposed allocation is in the outer court of the Priory and there is strong potential for the continuation of survival of archaeological remains associated with, and enhancing our understanding of, the 14<sup>th</sup> century Carmelite Priory. HE therefore considers that a heritage assessment is required, to inform the deliverability **prior to allocation** and that this should consider the potential for on-site archaeology associated with the Priory; with potential archaeological evaluation through geophysical survey and excavation to follow on before allocation.

We note that although the HELAA identifies the site as being situated within the Archaeological Constraint Area, the Plan itself does not allude to this within the 'Essential Site Specific Requirements and Other Uses' of Policy H2.

In terms of tall buildings, Coventry City's skyline includes the Spires of St. Michael, Holy Trinity & Christchurch. The Council's '*Tall Buildings Design Guide and Three Spires View Management Framework SPD*' notes that these spires '*have become synonymous with the image of the city, forming the iconic Three Spires Skyline. They are a majestic site on the skyline of the city and form an important link to the City's mediaeval past*'.

The SPD highlights that for View cone 7: Parkside, within which proposed site allocation H2:30 is situated: '*Whilst this view is not a major route into the city centre, it is one of the main entrance points into the technology park and it offers a unique view of St. Michaels, Holy Trinity and the Council House clock tower. It also provides a strong visual link between the modern technology park and the historic city*'. The SPD goes on to advise that '*Any development, adjacent to Whitefriars Gate could comfortably accommodate in the region of two/three storeys*'.

Although the SPD seeks to restrict building heights in this location, there is no information available as part of the consultation to demonstrate that any views analysis has been undertaken as part of the Plan process to suggest that residential development could come forward at the quantum sought, taking into account historic environment considerations.

For example, would restricted building heights result in blocks which, by virtue of their height, scale and massing, be harmful to the historic environment? Would the quantum of development anticipated at the site result in an overbearing height,

scale and mass to the city, resulting in harm to heritage assets? Is the quantum of development achievable at the site taking into account historic environment considerations?

As such, there remains a lack of meaningful evaluation within the evidence base of the Regulation 19 Plan of what the impact that the development of the site might have on designated and non-designated heritage assets and their setting.

HE is extremely concerned that there is no assessment of the potential issues relating to the historic environment, including the potential impact on archaeological remains or on the sky line of the city of Coventry. As such, we **object** to the allocation in respect of the quantum of development sought.

In the absence of any assessment of the degree of harm which the preferred site allocation might cause to the historic environment, at present the Plan cannot demonstrate that the site it is putting forward for development is compatible with the Council's own extant, and proposed, policies for the protection of the historic environment.

Moreover, in terms of national requirements, the Plan also fails to demonstrate that:

- The proposed site for allocation would be likely to "*conserve heritage assets in a manner appropriate to their significance*" as required by NPPF December 2023 Paragraph 195.
- The site that it is putting forward for development will deliver a "*positive strategy for the conservation and enjoyment of the historic environment*" as is required by NPPF December 2023 Paragraph 196.
- The site to be allocated would contribute to protecting or enhancing the historic environment. Therefore, it has not shown that it is likely to deliver sustainable development in terms of the historic environment (NPPF December 2023 Paragraph 7).

Therefore, the draft Plan has not shown that it would be likely to deliver the Government's objectives for the historic environment.

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

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.

In order to make the Coventry City Council Publication Consultation (Regulation 19) Plan sound, HE considers that the following is required:

Further assessment work should be undertaken to -

- Identify all of the heritage assets affected by the potential site allocation;
- Understand what contribution the site makes to the significance of the heritage assets;
- Identify what impact the allocation may have on that significance; and,
- Consider maximising enhancements and avoiding harm.

If this work has already been undertaken it has not been possible to identify it within the consultation material. We would be pleased to discuss this with you further ahead of the Examination in Public hearings for the Plan, with a view to preparing a Statement of Common Ground.

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

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

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**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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