



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**

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**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	Policy H2  Site Refs: H2:3 / H2:15 / H2:26 / H2:27 / H2:33 / H2:36 / H2:37 & H2:38
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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 checked="" type="checkbox"/>	No	<input 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.

Thank you for consulting Historic England on the Coventry Local Plan Review Regulation 19 Proposed Submission that was published on 20<sup>th</sup> January 2025. In relation to this consultation document, we have the following comments:

**General comments**

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/>

With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. We recommend that the views of your chosen specialist archaeological adviser are sought on these allocations to confirm that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required through field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site.

In terms of the evidence accompanying the Regulation 19 Proposed Submission Plan, HE welcomes the November 2024 'Design and Heritage Background Paper'. 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', which include 'Built Environment and Heritage'. We particularly note that the methodology for the HELAA 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' provided is that 'A Heritage Impact Assessment would be required, prepared in consultation with relevant agencies, to assess the potential impact of any future development'.*

This is the first opportunity we have had to consider the proposed site allocations and despite the site assessments 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, and 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.

In relation to specific site allocations, we have serious concerns about the lack of heritage evidence and the deliverability of H2:30 and H2:32. These are the subject of separate representations. In relation to several other proposed site allocations, we would make the following suggestions, set out under 6. below, in order to ensure that the Plan sets out a positive strategy for the conservation and enjoyment of 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.

### **Specific comments**

#### **Policy H2: Housing Allocations**

##### **Site Ref: H2:3 Walsgrave Hill Farm -**

Historic England notes the proximity of this proposed site allocation to the Grade II\* Registered Park and Garden (RPG) of Coombe Abbey. Whilst we have no comments to make in relation to the impact of the development on this RPG, we suggest that the development should look for opportunities to connect with the green space/cluster of trees at Hungerley Hill, which may have once been part of this designed landscape.

##### **Site Ref: H2:15 Land at Sandy Lane –**

We note that this is the site of the former Daimler car factory (Britain's first car manufacturer). The Daimler Powerhouse (former car factory building, now a creative hub) is designated as a building of local interest, included on the Council's 'Local List' and the northern part of the site falls within the Coventry Canal Conservation Area. HE therefore recommends that the advice of the Council's local specialist conservation officer is sought.

##### **Site Ref: H2:26 Coventry Central Police Station, Little Park Street –**

HE notes that the eastern half of site lies within View Cone 8: Mile Lane & the western half within View Cone 10: Quinton Road, as defined in the Council's 'Tall Buildings Design Guide and View Management Framework SPD'. The site also is situated near to the High Street Conservation Area and to Christchurch Steeple (GII\* Listed).

Whilst the '*Essential Site Specific Requirements and Other Uses*' listed in the Plan requires that development here is sensitive to these View Cones, HE considers that a Heritage Impact Assessment should be required at planning application stage to inform the deliverability of the 600 units estimated, as we have concerns that such a capacity would necessitate particularly tall buildings, with potential harmful impacts for the historic environment.

**Site Ref: H2:27 New Union Street Car Park –**

HE notes that the entire site lies within View Cone 9: Mile Lane (Christ Church) as defined in the Council's 'Tall Buildings Design Guide and View Management Framework SPD'. The site also is situated near to the Greyfriars Green Conservation Area, the High Street Conservation Area, the Listed Grade II\* Register Office and Christchurch Steeple (also listed as GII\*).

Whilst the '*Essential Site Specific Requirements and Other Uses*' listed in the Plan requires that development here is sensitive to this View Cone, HE considers that a Heritage Impact Assessment should be required at planning application stage, as we have concerns that the deliverability of 170 units estimated would necessitate tall buildings, with potential harmful impacts for the historic environment.

In addition, the South end of allocation is close to the site of Cheylesmore Gate and the alignment of the City Wall. HE considers that detailed work is required to inform the potential for archaeology and that opportunities to better reveal the former alignment of the City Wall and former gate should be explored where the potential is confirmed. We therefore recommend that the policy wording of the allocation should request an archaeological assessment at planning application stage and that development should consider incorporating green space into the southern-most area of site to create flexibility in the design to conserve archaeological remains in situ where present.

**Site Ref: H2:33 The Allesley Hotel, Birmingham Road –**

HE welcomes that the retention and enhancement of adjacent listed buildings and heritage assets is included within the '*Essential Site Specific Requirements and Other Uses*' listed in the Plan under Policy H2 for this site.

However, the hotel itself at the frontage of the site is a non-designated heritage asset and HE considers that this building should be retained, as it makes a positive contribution to the Allesley Village Conservation Area, within which the site is situated. We recommend that this requirement be added to the '*Essential Site Specific Requirements and Other Uses*' listed in the Plan under Policy H2 for this site.

There is also the potential for the re-development of the site to emphasise the former boundary of Allesley Park which is associated with the historic parkland that surrounded the former house of Allesley Park and Allesley Castle Scheduled Monument.

HE recommends that a Heritage Impact Assessment should be required to be submitted with any planning/Conservation Area applications for the site.

**Site Ref: H2:36 Land at Spon End –**

We note that part of the site lies within the Spon End Conservation Area and the site includes a Scheduled cast iron single-span bridge (which was moved to the site in 1969). HE recommends that a Heritage Impact Assessment should be required at planning application stage and that a masterplan should also be required for the site at planning application stage to demonstrate linkages between the historic environment and the green/blue infrastructure which forms the setting for the bridge. We note that as the bridge is a Scheduled Monument HE will need to be involved in discussions.

**Site Ref: H2:37 City Centre South –**

HE notes that this site now has planning permission, with a S106 Agreement for the relocation of the Grade II listed Mural and that HE gave advice at that stage. We recommend that any opportunities to better reveal the former alignment of the City Wall and gate, through archaeological investigation, should be explored.

**Site Ref: H2:38 Friargate – Land bounded by Railway, Grosvenor Road, Manor Road, and including Greyfriars Green and Station Square –**

HE notes that this was allocated site in the adopted Plan, but that the mix has now changed through the planning consents. We recommend that any opportunities to better reveal the former alignment of the City Wall and site of Greyfriars Gate, through archaeological investigation, should be explored.

We hope that the above comments will assist but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its Regulation 19 consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

(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)?

☒

**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.