

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).

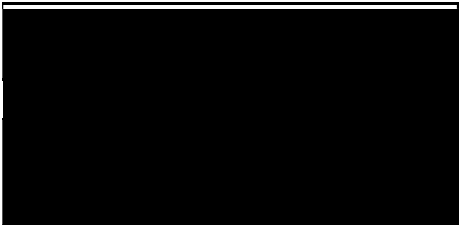
Please fill in a separate sheet for each representation you wish to make.

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		Mrs
First Name		Lucy
Last Name		Quibell
Job Title		Strategic Land Director
(where relevant)		
Organisation		Holt Property Limited
(where relevant)		
Address Line 1		The Office
Line 2		Jackson's Farmhouse
Line 3		Charlecote
Line 4		Warwickshire
Post Code		CV35 9EW
Telephone Number		
E-mail Address		

Part B – Please use a separate sheet for each representation

Name or Organisation: Holt Property Limited

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

Paragraph Policy

4. Do you consider the Local Plan Review is:

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

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.

The following representations are made in response to the Coventry Local Plan Review Regulation 19 Proposed Submission (Publication Stage) Consultation document (December 2024) on behalf of the landowner, in respect of their land interest at Land East of Pickford Grange Lane, Coventry (Site Ref: BAB-017-24).

Policy DS1: Overall Development Needs – Plan Period & Housing Requirement

Not Sound and Doesn't Comply with Duty to Co-Operate

- The Plan Period is 2021-2041. There is no justification for a Plan period that starts at least five years before the Local Plan is likely to be adopted, and there is no support for adopting such an approach in the NPPF or NPPG. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement.

- Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 dwellings compared to 4,365 dwellings (1,455 x 3 years)). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493 (as

set out in Table 6.1 of the Publication document) minus 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected.

- By adopting a Plan period that looks back five years, the Council is manipulating the figures to avoid meeting the housing needs of the City.

- Furthermore, Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged.

- It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67.

- Further consideration should be given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. It is understood that work is underway to update the Position Statement to 2025, Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still likely significant. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF.

- In addition, Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not consistent with the NPPF Paragraph 33. Further, NPPF Paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a. to d. under 4. in DS1. Policy DS1 4. should be amended to be consistent with Paragraph 33 of the NPPF.

(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.

Policy DS1: Overall Development Needs – Plan Period & Housing Requirement

To ensure Policy DS1 is sound and complies with the Duty to Cooperate, the following modifications are required:

1. Amend the Plan Period to Ensure Compliance with National Policy

- The Plan period should not include a retrospective start date of 2021. Instead, it should commence from the anticipated adoption date (2026) and extend to at least 2042.
- Policy amendment required: Revise Policy DS1 to state that the Plan period will run from 2026 to at least 2042, ensuring a full 15-year timeframe from adoption in accordance with NPPF Paragraph 21.
- Remove references to the retrospective start date of 2021, as this undermines the Plan's ability to make sufficient housing provision for the future.
- Justification:
 - NPPF Paragraph 21 requires Local Plans to look ahead for a minimum of 15 years from adoption. The proposed period of 2021–2041 fails to meet this requirement.
 - Extending the plan period to 2042 ensures compliance in the event of adoption delays if the Examination takes longer than expected.

2. Increase the Housing Requirement to Reflect Identified Needs

- The proposed housing requirement of 1,455 dwellings per annum (dpa) is insufficient to meet the identified need.
- Policy amendment required: The minimum housing requirement should be 35,352 homes from 2024 to 2042, plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country.
- Justification:
 - The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) identifies a need for at least 1,964 dpa.
 - The removal of 35% (509 dpa) from the calculation is not justified within national policy when applied in this context.
 - NPPF Paragraph 60 requires Local Plans to significantly boost the supply of homes. However, the Plan period and housing requirement in Policy DS1 actively constrain future delivery by retrospectively

including supply from 2021 and failing to plan for sufficient homes beyond 2026.

3. Address Unmet Housing Needs from Birmingham and the Black Country

- The Council has not demonstrated effective engagement with Birmingham and Black Country authorities on housing needs.
- Policy amendment required:
 - The Plan should explicitly identify and accommodate an appropriate proportion of Birmingham and Black Country's unmet housing need.
 - The Duty to Cooperate process should be evidenced and made transparent in accordance with NPPF Paragraph 27.
- Justification:
 - The Greater Birmingham & Black Country Housing Market Area (GBBCHMA) Position Statement Addendum (April 2023) identified a 106,654 dwelling shortfall, with only 18,181 dwellings currently committed.
 - NPPF Paragraph 35(c) requires plans to be positively prepared and effective. The absence of a transparent approach to unmet need undermines these tests of soundness.

4. Introduce a Review Mechanism to Ensure Policy Remains Up to Date

- Policy DS1 4. does not currently commit to a formal review mechanism, meaning the housing requirement could become outdated before the next plan review.
- Policy amendment required:
 - The Plan should commit to a mandatory review within five years of adoption, ensuring alignment with NPPF Paragraph 33.
- Justification:
 - NPPF Paragraph 33 requires strategic policies to be reviewed at least every five years. Without a clear review mechanism, the Plan risks becoming inconsistent with changing housing needs.

Conclusion

Without these modifications, Policy DS1 is not sound and fails the Duty to Cooperate. The proposed changes will ensure that:

- The Plan Period aligns with national policy and provides a realistic forward-looking strategy.
- The housing requirement reflects economic and demographic realities.
- Cross-boundary unmet housing needs are addressed in line with national guidance.
- A robust review mechanism ensures policy remains relevant and effective.
- A robust review mechanism ensures the Local Plan remains responsive to changing housing and economic conditions.

These modifications are necessary to ensure Policy DS1 meets the tests of soundness as required by NPPF Paragraph 35, ensuring it is positively prepared, justified, effective, and consistent with national policy.

Additional Housing Land – Land East of Pickford Grange Lane, Coventry

To strengthen the housing supply strategy and ensure sufficient deliverable land is allocated, the Council should consider the suitability of Land East of Pickford Grange Lane, Coventry.

- The site is immediately available and can contribute to short-term housing delivery.
- It is adjacent to the Eastern Green Allocation, making it a logical urban extension.
- Unlike some constrained sites, this land has no major environmental or viability barriers.
- The Green Belt assessment should be reviewed more granularly, as this site does not significantly contribute to Green Belt purposes and could be released without harming strategic objectives.

The allocation of Land East of Pickford Grange Lane, Coventry is necessary to support the delivery of a positively prepared and sound development strategy. The site is adjacent to the Eastern Green Sustainable Urban Extension (SUE), making it a logical urban extension that can integrate seamlessly into existing infrastructure and services.

(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.

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy

2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

3. 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 H1 – Housing Land Requirements

Not Sound

- As set out in response to Policy DS1, it is considered that the Plan period and housing requirement set out are unsound on the basis of not being positively prepared, justified, or consistent with national policy. Policy H1 1. should be amended in line with amendments with Policy DS1.
- Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. The Council should ensure that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where they may be questions marks over deliverability or viability which need to be appropriately evidenced.
- Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate.
- Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on some sites which are allocated and proposed to be carried forward. This raises deliverability concerns.
- It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be

provided on this point, and the Council should ensure no sites are being double counted in the supply as a result.

- As set out in response to Policy H2, there are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings.
- Taking all of the above into account, it is clear that the housing requirement will therefore not be delivered in line with the trajectory in Appendix 3. Policy H1 2. and Appendix 3 should be amended to ensure sufficient sites are identified to meet the housing requirement.
- Furthermore, Policy H1 3. is not consistent with national policy. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year.
- It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with NPPF Paragraph 69 a).

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

4. 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: Housing Land Requirements

To ensure Policy H1 is sound, the following modifications are required:

1. Align the Housing Requirement with Policy DS1

The Plan period and housing requirement are unsound, as they are not positively prepared, justified, or consistent with national policy.

Policy amendment required: Policy H1 must align with Policy DS1's required modifications, increasing the housing requirement to 1,964 dpa, reflecting actual need.

Justification: The Coventry & Warwickshire HEDNA (2022) identifies a minimum need of 1,964 dpa, which the Plan fails to meet.

The 35% reduction applied to the Standard Method uplift is unjustified, contradicting NPPF Paragraph 60, which requires Local Plans to significantly boost housing supply.

2. Ensure All Housing Supply Meets NPPF ‘Developable’ Definition

Policy H1 2. relies on a housing trajectory (Appendix 3) that lacks evidence supporting the deliverability of committed sites.

Policy amendment required: Provide a detailed trajectory for committed supply.

Apply a 5% lapse rate to sites without confirmed start dates.

Justification: NPPF Glossary defines ‘Developable’ as sites with a realistic prospect of delivery.

Without a clear trajectory and lapse rate analysis, the Plan overestimates housing delivery.

3. Remove Housing Allocations That Are Not ‘Developable’

The Plan includes multiple sites that lack progress or are constrained by existing land uses.

Policy amendment required: Remove the sites which do not meet the NPPF definition of ‘Developable’.

Justification: HELAA assessments highlight deliverability concerns, and no evidence exists of landowner intent to bring these sites forward.

4. Provide a Site-Specific Trajectory for Appendix 3

Appendix 3 lacks a site-by-site breakdown, making it impossible to verify whether the Plan meets the Five-Year Housing Land Supply requirement.

Policy amendment required: Provide a detailed trajectory specifying delivery timelines, particularly for outline planning permissions.

Justification: NPPF Paragraph 69(a) requires Plans to demonstrate a Five-Year Housing Land Supply at adoption.

Without a site-specific breakdown, the Plan is unsound.

Conclusion

Without these modifications, Policy H1 is unsound and does not comply with NPPF Paragraph 35. The proposed changes will ensure that:

- The housing requirement aligns with Policy DS1 and meets identified need.
- Committed sites meet the NPPF definition of ‘Developable’.
- Undeliverable allocations are removed.
- A clear trajectory is provided for Appendix 3.
- To ensure a robust and deliverable housing supply trajectory, the Council should allocate Land East of Pickford Grange Lane, Coventry, which is free from major constraints, available immediately, and capable of delivering new homes within the first five years of the Plan. Unlike some allocated sites, which have uncertain viability or infrastructure requirements, this site can provide certainty in housing delivery.

To support the Plan's overall soundness, the Council should allocate Land East of Pickford Grange Lane, Coventry, as it is immediately available, well-connected, and free from major constraints. The site can contribute to short-term housing supply, providing a viable and deliverable alternative to sites with uncertain development timelines.

These modifications are necessary to ensure Policy H1 is positively prepared, justified, and effective.

(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.

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy

2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

3. 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

Not Sound

- Policy H2 1. is not consistent with national planning policy.
- We have an overall concern with the focus of new housing allocations in particular on brownfield sites. Whilst making best use of brownfield land is supported by the NPPF (including Paragraph 123), brownfield development is generally more challenging in terms of deliverability and viability. Thus, the focus of new allocations on brownfield sites likely means less overall affordable housing delivery, for which there is a significant need in the City of some 2,035 dwellings per annum according to the HEDNA. Furthermore, development will be less able to provide necessary infrastructure delivery, to the disbenefit of new and existing residents of the City.
- Turning to proposed site allocations, sites that do not meet the definition of Developable as set out in the NPPF Glossary should therefore be removed.

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

4. 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 H2: Housing Allocations

To ensure Policy H2 is sound and complies with national policy, the following modifications are required:

1. Ensure a Deliverable and Sustainable Housing Allocation Strategy

The Plan's over-reliance on brownfield sites raises viability concerns, limiting affordable housing delivery and infrastructure provision.

Policy amendment required: Introduce a balanced approach to allocations, incorporating both brownfield and greenfield sites to ensure deliverability.

Justification: NPPF Paragraph 123 supports brownfield land use, but sites must be viable to provide necessary housing and infrastructure.

The HEDNA identifies a need for 2,035 affordable dwellings annually, which brownfield-heavy allocations struggle to meet due to high remediation costs.

2. Remove Undevelopable Site Allocations

The Plan allocates sites that do not meet the NPPF definition of 'Developable' due to uncertainty and overestimated capacity.

Policy amendment required: Remove these sites.

Justification: Sites need to be deliverable.

Conclusion

Without these modifications, Policy H2 is unsound. These changes will ensure:

- A deliverable and balanced housing allocation strategy.
- Accurate housing figures that reflect net new supply.
- The inclusion of additional sustainable sites, such as Land East of Pickford Grange Lane, Coventry, to strengthen housing supply and ensure deliverability. The site is strategically located next to the Eastern Green SUE, making it an ideal site for future growth.

To ensure a robust and justified allocation strategy, the Council should allocate Land East of Pickford Grange Lane, Coventry, which is immediately available, well-located, and free from major constraints. The site provides a realistic and viable alternative to constrained or uncertain allocations, reinforcing the Plan's ability to meet its housing requirement in full.

These modifications are necessary to ensure Policy H2 is positively prepared, justified, and effective under NPPF Paragraph 35.

(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.

5. 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

N/A

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

6. 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.

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

(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.