



Ref:

**Coventry Local Plan Review
Regulation 19**

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

(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.

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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.*

Title

Mrs

2. Agent’s Details (if applicable)

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First Name	Kay	
Last Name	Farrer	
Job Title		
(where relevant)		
Organisation		
(where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy

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="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.

Strategic Policy: H2 Housing Allocations

Table 6.2 - Site Allocations for Housing Heading states: 'Total Dwellings'

The words 'Total Dwellings' remains the same in the Coventry Local Plan Review Regulation 19 as it was stated in the adopted 2017 Local Plan.

Over the last few years, the word 'Total' has caused confusion amongst residents, councillors and members of the planning committee alike.

When planning officers have referenced this policy, in applying the word 'minimum', which is used in other policies, it appears to make the word 'Total' ambiguous, which in my view, leads to uncertainty and a lack of clarity.

I believe it is likely that any reasonable reader would understand that the word 'Total', (as stated and in the context of Policy H2), would mean the whole number/whole amount of dwellings.

For these reasons, I consider Policy H2, Table 6.2 Heading 'Total Dwellings' to be unsound.

(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.

Strategic Policy H2: Housing Allocations

Table 6.2 - Site Allocations for Housing Heading states: 'Total Dwellings'

I would suggest the revised wording for Table 6.2 Site Allocations for Housing Heading should be:

'Assessed Capacity Number of Dwellings'

This would reflect the language used in the Housing and Economic Land Availability Assessment, (November 2024, [HELLA]) and link to the 'HELLA ref.' that is also in Table 6.1 Heading

Where the HELLA reference is given in Table 6:2 - Site Allocations Heading; it is the assessed capacity figure that is given in Table 6:2.

With other site allocations promoted through the Strategic Housing Land Availability Assessment (January 2016); it is the assessed potential (net) number of units (dwellings) figure that is given in Table 6.2.

In my view, the suggested revised wording 'Assessed Capacity, Number of Dwellings' would give clarity and certainty and support the soundness of the plan.

(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)

☒

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:

I would like to participate in the hearing session(s) to enable me to contribute to any discussions that may take place about the Strategic Policy H2 Housing Allocations, Table 6.2 - Site Allocations for Housing Heading 'Total Dwellings'

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.