

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/planningpolicyprivacynote

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

2. Agent's Details (if applicable)**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	<input type="text"/>	Mr
First Name	<input type="text"/>	Reiss
Last Name	<input type="text"/>	Sadler
Job Title	<input type="text"/>	Associate Director
(where relevant)		
Organisation	<input type="text"/>	Marrons
(where relevant)		
Address Line 1	<input type="text"/>	Bridgeway House
Line 2	<input type="text"/>	Bridgeway
Line 3	<input type="text"/>	Stratford-upon-Avon
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	CV37 6YX
Telephone Number	<input type="text"/>	
E-mail Address	<input type="text"/>	

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 DS1

4. Do you consider the Local Plan Review is:

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

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.

Plan Period

- Policy DS1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan period that starts five years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG. NPPF Paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years. 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. only plans to 2041. NPPF 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.

Housing Requirement

- Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned for in Coventry is considered acceptable in principle, concerns are raised in the submitted Housing Need Evidence Base Review relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic. As a minimum, the Housing Need Evidence Base Review considers that the 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate.
- 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 of 1,964 dwellings per annum 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, in particular with relation to high levels of affordable housing need as established through the HEDNA.
- Further consideration will also need to 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. 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.
- Policy DS1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country.

Review Mechanism

- 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.

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.

- The Plan Period should be updated to 2024 to 2042
- 1,964 dwellings per annum should be utilised as a starting point for the housing requirement, plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country.
- Policy DS1 should be revised to state the Council will review the Local Plan within five years from adoption.

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

N/A

Please add any further comments relating to the SA report in the box below.

N/A

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

To articulate these representations to the Inspector(s).

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.

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 H1

4. Do you consider the Local Plan Review is:

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

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.

- As set out in response to Policy DS1, 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 to set a housing requirement of a minimum of 35,352 additional dwellings between 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.
- 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. Applying a 5% lapse rate to committed development not started would reduce the level of committed supply accounted for in the Plan to 13,454 dwellings.

- Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on H2:03 Walsgrave Hill Farm which is allocated and proposed to be carried forward for 900 dwellings. Indeed, the Council's own HELAA assessment of the site (HEN-002-24) raises deliverability concerns and suggests it is not available until 11+ years. Given the lack of progress made on the site since it was allocated eight years ago and concerns raised in the HELAA, it is considered that this site is not Developable in line with the NPPF Glossary definition and should not be carried forward. Similarly, H2:16 Land at Carlton Road (85 dwellings) has not been progressed since its allocation in 2017 and indeed is an existing industrial site with current occupiers. No evidence is provided with regard to future intentions of occupiers or the landowner. H2:19 Land at Mitchell Avenue (50 dwellings) has also not been progressed since its allocation in 2017, neither has H2:20 Land at Durbar Avenue (45 dwellings) or H2:22 Land at Jardine Crescent (25 dwellings). These sites should also be removed as carried forward allocations as not Developable in line with the NPPF Glossary.
- 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.
- Proposed New Allocations H2:31 and H2:36 should be removed from the supply, as set out in response to Policy H2.
- Given the lack of compelling evidence, it is considered that the proposed windfall allowance should be removed from anticipated supply. Furthermore, given there is no certainty around delivery of sites identified in the HELAA which are not allocated and do not have planning permission, including land availability and any significant infrastructure requirements or land remediation which means the sites cannot be viably delivered, this supply does not meet the definition of Developable as set out in the NPPF Glossary as should not be counted towards the CLPR supply as a result. Notwithstanding this, it is considered likely that the inclusion of identified HELAA sites in addition to a windfall allowance is likely to be double counting, as inherently these identified HELAA sites would come forward as windfall development.
- The implication of the above assessment is the CLPR overestimates supply; Marrons identify a shortfall against the requirement as a result. 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).

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 H1 1. should be amended in line with amendments with Policy DS1 to set a housing requirement of a minimum of 35,352 additional dwellings between 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.
- A 5% lapse rate should be applied to commitments not started.
- 2017 Local Plan Allocations H2:03, H2:16, H2:19, H2:20 and H2:22 should be removed.
- Proposed New Allocations H2:31 and H2:36 should be removed from the supply, as set out in response to Policy H2.
- The proposed windfall allowance should be removed from the supply.
- The 'Other Identified HELAA Sites' should be removed from the supply.
- Additional sites should be identified to meet the housing requirement.

- Appendix 3 should be updated to include a site-by-site breakdown of anticipated delivery.
- Appendix 3 should be reviewed to ensure sites within the five year period are 'Deliverable', and the Five Year Housing Land Supply Assessment taken from 2025/26 or 2026/27/

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

N/A

Please add any further comments relating to the SA report in the box below.

N/A

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

To articulate these representations to the Inspector(s).

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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 H2

4. Do you consider the Local Plan Review is:

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

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.

- Catesby Estates has 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.
- Catesby Estates considers sites H2:31 and H2:36 do not meet the definition of Developable as set out in the NPPF Glossary, and should therefore be removed from Table 6.2.
- Catesby Estates also objects to the omission of Land at Birmingham Road, Allesley as an allocation in Draft Policy H2. Development can be focused to the south and east of the Site with a newly established landscape buffer to

the north and west which would from an appropriate new Green Belt boundary by effectively rounding off this western part of Coventry.

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.

- Removal of sites H2:31 and H2:36 from Table 6.2.
- Including Land at Birmingham Road, Allesley as an allocation in Table 6.2.

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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

N/A

Please add any further comments relating to the SA report in the box below.

N/A

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

To articulate these representations to the Inspector(s).

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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 H3

4. Do you consider the Local Plan Review is:

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

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.

Whilst Catesby Estates is supportive of the Nationally Described Space Standard (NDSS) being used to influence the standard of housing developments in principle, there may be instances where greater flexibility is required in order to meet local housing need. The NPPF (at Footnote 52) is clear that policies which seek to adopt the NDSS may be supported but only where it can be justified. The CLPR lacks this justification. Whilst implementation of the NDSS has been considered in the round in the Viability Assessment, where development proposals have viability challenges the resultant impact on implementation of NDSS may be a reduction in affordable housing provision. In any case, the viability of implementing the NDSS in the CLPR isn't sufficient justification.

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 H3 should be revised to provide encouragement for NDSS instead of requiring compliance.

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.

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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

N/A

Please add any further comments relating to the SA report in the box below.

N/A

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

To articulate these representations to the Inspector(s).

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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 H4

4. Do you consider the Local Plan Review is:

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

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.

Whilst it is accepted that the HEDNA provides the starting point for housing mix considerations, as drafted Policy H4 could be interpreted as too onerous for development proposals which aren't listed in part 2, including strategic sites where an alternative housing mix may be appropriate.

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 H4 should be revised to reference the mix outlined in the HEDNA as a starting point but provide broader flexibility, noting that the location of development can lend itself to a certain element of the HEDNA mix.

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

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Paragraph

N/A

Please add any further comments relating to the SA report in the box below.

N/A

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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 EM11

4. Do you consider the Local Plan Review is:

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

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 EM11 is unduly onerous and not necessary. The CLPR should not seek to introduce additional standards for residential development due to the forthcoming implementation of the Future Homes Standard later in 2025. Policy EM11 is not justified in line with NPPF Paragraph 35 b) as should be deleted.

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 EM11 should be deleted.

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

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

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8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

N/A

Please add any further comments relating to the SA report in the box below.

N/A

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To articulate these representations to the Inspector(s).

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