

# 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](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 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\*

### 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

Ms

Mr

First Name

Sally

Gary

Last Name

Miller

Stephens

Job Title

Senior Land and Planning Manager

Partner

(where relevant)

Organisation

Hallam Land

Marrons

(where relevant)

Address Line 1

10 Duncan Close

Bridgeway House

Line 2

Red House Square

Stratford-upon-Avon

Line 3

Moulton Park

Line 4

Northampton

Post Code

NN3 6WL

CV37 6YX

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  Policy

4. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	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 H1: Housing Land Requirements – Plan Period****Not Sound**

1. Policy H1 is not positively prepared, justified, or consistent with national policy.
2. Policy H1 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.
3. 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.

4. 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.
5. Policy H1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions<sup>1</sup>. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 - 1,455 x 3). 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<sup>2</sup> – 7,666<sup>3</sup> = 23,827 which is less than the minimum of 24,007<sup>4</sup> homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected.
6. The NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the City.
7. Further to the above point, Policy H1 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.

### **Policy H1: Housing Land Requirements – Housing Requirement**

#### **Not Sound**

8. Policy H1 1. also specifies the minimum housing requirement as 29,100 (1,455 dpa). This is based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022), minus 10,180 dwellings (509 dpa) based on removing 35%. The removal of 35% is a reference to the 'urban uplift' which should be applied to the Local Housing Need calculation using the Standard Method, and not the HEDNA method of calculating housing need.
9. 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 attached Housing Need Evidence Base Review relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic.

<sup>1</sup> Table 5 of the HELAA November 2024

<sup>2</sup> Total supply from Table 6.1 of the Proposed Submission Plan

<sup>3</sup> Past net completions from Table 6.1 of the Proposed Submission Plan

<sup>4</sup> Based on 1,455 dwellings per annum x 16.5 years (mid 2024 to 2041)

10. The HEDNA uses the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain economic conditions. The CE forecast is for 0.44% per annum growth (820 jobs per annum) in Coventry over the CLPR Plan period, less than the 1.0% per annum growth (equivalent to 1,995 jobs per annum) experienced since 1981, and growth of over 2% per annum between 2011 and 2019 (3,338 jobs per annum). The CE forecasts were also based on 3.6% GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4.0% in 2022, following growth of 7.6% in 2021.
11. Furthermore, the HEDNA identifies how 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associated it has not been considered.
12. As a minimum, the attached Housing Need Evidence Base Review considers that 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. This is particularly important given the recognised shortfall in employment land supply of circa 45ha (Paragraph 3.15 of the Proposed Submission), with the deficit in employment land supply likely to be even greater than reported.
13. 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 national guidance<sup>5</sup>; for example in order to address a significant affordable housing shortfall, support economic development or address strategic infrastructure requirements which are likely to increase the number of homes needed.
14. As set out in the attached Housing Need Evidence Base Review, the HEDNA describes affordable housing need across the HMA as “*clearly acute*” and identifies a “*notable need*” for affordable housing. It also states how it is clear that provision of new affordable housing is an “*important and pressing issue in the area*”. Figure 8 of the AMR 2023/24 shows that 2,933 affordable homes have been delivered since 2011 compared to a Local Plan requirement of 4,176 dwellings for the same period.
15. The HEDNA calculates *significantly higher* affordable need in CCC of approximately 2,000 affordable dwellings per annum. This reflects the Council's waiting list (over 13,000 households), a 68% increase in the number of households in temporary accommodation in only 24 months, a 114% increase in only five years in the number of households who are homeless and owed a relief duty, and the fact that Coventry has the 12<sup>th</sup> highest ratio of

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<sup>5</sup> Paragraph: 010 Reference ID: 2a-010-20201216 of National Planning Practice Guidance

homeless households per 1,000 population of over 300 local authorities in England.

16. Addressing affordable housing need in any meaningful way will require an uplift to the HEDNA's calculation of 1,964 dwellings per annum.
17. 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.

#### *Birmingham and the Black Country*

18. There are strong functional relationships between Birmingham, the Black Country and Coventry, in terms of transport connections and commuting patterns, and development in Coventry can contribute towards meeting unmet needs. As set out in the Birmingham HENDA (2022) at Appendix 1 on Housing Market Area and Functional Economic Market Area, Coventry has one of the highest levels of migration flows with both Birmingham and the Black Country. Development in Coventry can contribute towards meeting unmet needs. Whilst in the past Coventry itself has declared unmet needs and not contributed to unmet needs in the HMA, that situation no longer exists.
19. 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, and we still expect this work to identify a significant deficit in supply across the HMA as explained below.

#### *Birmingham*

20. There are strong functional relationships between Birmingham and Coventry and the relationships across the wider area should be understood including the relationship between homes and jobs as a Functional Economic Market Area.
21. It is recognised that the shortfall arising from Birmingham is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum given the Local Housing Need derived from the Standard Method has decreased to 4,448 dwellings per annum. Indeed, based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Birmingham Local Plan period 2020 to 2042 and comparing with reported supply in the Birmingham Local Plan Preferred Options (July 2024), the shortfall arising from Birmingham will have been eradicated.

### *Dudley*

22. The Dudley Local Plan was subject to Regulation 19 consultation in October and November 2024. It reports a housing need of 11,169 dwellings in the Plan period 2024 to 2041 with supply of 10,470 dwellings, resulting in a shortfall of 699 dwellings to be exported through the Duty to Cooperate.
23. It is noted that the housing requirement is based on the Local Housing Need derived from the previous Standard Method of 657 dwellings per annum; this has now increased significantly to 1,462 dwellings per annum.
24. Should the Dudley Local Plan be submitted for Examination before 12th March 2025 it will be captured by the transitional arrangements set out in the NPPF and able to continue on the basis of the lower Local Housing Need derived from the previous Standard Method. However, should the Dudley Local Plan not progress to Examination before 12th March 2025, the Council will be required to utilise the increased Local Housing Need derived from the Standard Method for plan-making. Based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Dudley Local Plan period 2024 to 2041 and comparing with reported supply in the Dudley Local Plan Publication Plan (October 2024), the shortfall arising from Dudley would increase to some 14,384 dwellings.

### *Sandwell*

25. The Sandwell Local Plan was submitted for Examination in December 2024. It reports a supply of 10,434 dwellings compared with a housing need of 26,350 dwellings in the Plan period 2024 to 2041, resulting in a shortfall of some 15,916 dwellings to be exported through the Duty to Cooperate.
26. It is noted that Sandwell's Local Housing Need derived from the Standard Method has marginally reduced from 1,550 dwellings per annum to 1,346 dwellings per annum, however given the stage of preparation of the Sandwell Local Plan it is captured by the transitional arrangements in the NPPF. In any case, the shortfall in supply in Sandwell is significant.

### *Walsall*

27. Further to the disbandment of the Black Country Plan in late 2022, Walsall Council have not yet made notable progress on a new Local Plan, with Issues and Options consultation is expected in 2025. Given the shortfall reported in the Black Country Plan and the increase in Walsall's Local Housing Need derived from the Standard Method since (now 1,148 dwellings per annum), it is likely that there will continue to be a shortfall arising from Walsall that requires consideration.

### *Wolverhampton*

28. The Wolverhampton Local Plan was subject to Regulation 19 consultation in November 2024 to January 2025. It reports a housing need of 19,728

dwellings in the Plan period 2024 to 2042 with supply of 9,330 dwellings, resulting in a shortfall of some 10,398 dwellings to be exported through the Duty to Cooperate.

#### *Contributions to Shortfall*

29. The GBBCHMA Position Statement Addendum outlines contributions towards unmet needs committed at April 2023, however several of these commitments have now fallen away or been reduced.
30. 2,665 dwellings contribution from Lichfield are noted in the Position Statement Addendum, however the Lichfield Local Plan was withdrawn in October 2023. Initial work on a new Local Plan has commenced and was subject to Issues and Options consultation in October to December 2024. The Issues and Options document confirms commitment to the Duty to Cooperate but does not set a commitment to meeting unmet needs arising from the GBBCHMA.
31. 1,500 dwellings contribution from Shropshire are noted in the Position Statement Addendum. Whilst this is still maintained, the Shropshire Local Plan Review is currently under scrutiny at Examination with significant soundness concerns raised by the Inspectors. There is therefore potential for the Shropshire Local Plan Review to be withdrawn and the committed contribution to unmet needs to disappear.
32. 2,105 dwellings contribution from Solihull are noted in the Position Statement Addendum, however the Solihull Local Plan Review was withdrawn in October 2024, with no progress yet made on a new Local Plan.
33. 4,000 dwellings contribution from South Staffordshire are noted in the Position Statement Addendum, however this has been reduced to 640 dwellings in the South Staffordshire Local Plan submitted for Examination in December 2024.
34. The net result of the above is a reduction of some 8,130 dwellings in commitments to unmet needs arising from the GBBCHMA, with a further 1,500 dwellings committed also potentially falling away.
35. It is noted that the Telford and Wrekin Local Plan Review will be subject to Publication consultation from March 2025 and includes a commitment to 153 dwellings per annum towards unmet needs arising from the Black Country, however the total level of unmet needs to be met is not clear and it remains untested through Examination.

#### *Conclusion on Unmet Needs*

36. 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 significant. In addition, the level of committed contributions towards unmet needs has decreased.

37. 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 H1: Housing Land Requirements – Housing Supply**

### Not sound

38. Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3.
39. Appendix 3 includes a significant level of completions since 2021/22 (7,666 dwellings) and committed supply (13,975 dwellings). As set out in the accompanying Housing and Economic Land Availability Assessment (HELAA, November 2024), committed supply comprises sites under construction (3,545 dwellings), sites with detailed planning permission not commenced (4,970 dwellings), sites with outline planning permission not commenced (5,314 dwellings) and permitted development (146 dwellings).
40. The Council should demonstrate 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.
41. 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.
42. 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.
43. 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.

44. 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.
45. Proposed new allocations are explored further in response to Draft Policy H2 Table 6.2 below. 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.
46. In addition to identified sites, the Plan is proposing to include in the overall supply a further 816 dwellings on 'other identified HELAA' sites and an additional 2,800 dwellings in windfall allowance. Justification for windfall allowance is provided in the HELAA which sets out that 200 dwellings per annum is considered appropriate, taking effect from 2027/28 to avoid double counting. This is justified on the basis of recent windfall delivery rates in the City.
47. NPPF Paragraph 72 is clear that compelling evidence is required to justify a windfall allowance, having regard to the HELAA, historic windfall delivery rates and expected future trends. The HELAA does not consider influences on future trends of windfall delivery in the City and therefore does not comply with NPPF Paragraph 72 in providing compelling evidence.
48. 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.
49. 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.
50. The implication of the above assessment is the Plan overestimates supply as follows:

	Plan Assessment	Marrons Assessment
<b>Completions from 2024</b>	315	315
<b>Committed Supply</b>	13,795	13,454
<b>2017 Local Plan Allocations</b>	2,733	1,628
<b>Proposed New Allocations</b>	3,503	2,773
<b>Other Identified HELAA Sites</b>	816	0
<b>Windfall Allowance</b>	2,800	0
<b>Total Supply</b>	23,962	18,170

51. The housing requirement will therefore not be delivered in line with the trajectory in Appendix 3.

### **Policy H1: Housing Land Requirements – Five Year Supply**

#### Not sound

52. Policy H1. and Appendix 3 is not consistent with national policy.

53. 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.

54. 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 national policy in paragraph 69 a).

(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 H1 1. should 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.

Appendix 3 should be amended to ensure the Plan demonstrates the updated housing requirement in line with representations made above can be met (along with 5 year supply on adoption) with an appropriate buffer.

(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. 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)

8. 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.

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

To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

(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.***