

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	Mr	Mr
First Name	Gavin	David
Last Name	Gallagher	Fovargue
Job Title	Planning Director	Planning Director
(where relevant)		
Organisation	Rainier Real Estate Ltd	Marrons
(where relevant)		
Address Line 1		Bridgeway House
Line 2		Bridgeway
Line 3		Stratford-upon-Avon
Line 4		
Post Code		CV37 6YX
Telephone Number		
E-mail Address		

Part B – Please use a separate sheet for each representation

Name or Organisation: Marrons on behalf of Rainier Real Estate Ltd

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="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(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.

Policy GB2 of the Local Plan Review (LPR) is unsound and needs to be reviewed and justified in accordance with 2023 NPPF test of soundness 35(b), and to ensure that the approach to Green Belt is in accordance with national planning policy (2023 NPPF test of soundness 35(d)).

Rainier Real Estate is specifically seeking revisions to area '1a. Land south of Westwood Heath Road' within Policy GB2. The FH Roofing Site (2024 HELAA Ref. WES-003-23) needs to be removed from the safeguarded land designation, formally removed from the Green Belt, and allocated for development under Policy H2.

As set out in paragraph 9.7 of the LPR, land south of Westwood Heath Road was safeguarded in the adopted 2017 Local Plan in anticipation of future proposals being brought forward in Warwick District, through the South Warwickshire Local Plan (SWLP). In paragraph 9.8 the Council explains that given that the outcome of the SWLP is still uncertain then the safeguarded land designation will need to be considered through a future Local Plan update.

However, the extent of the area covered by the safeguarded land designation needs to be reconsidered *now* and as part of the LPR to specifically exclude 2024 HELAA Ref. WES-003-23 for the following reasons.

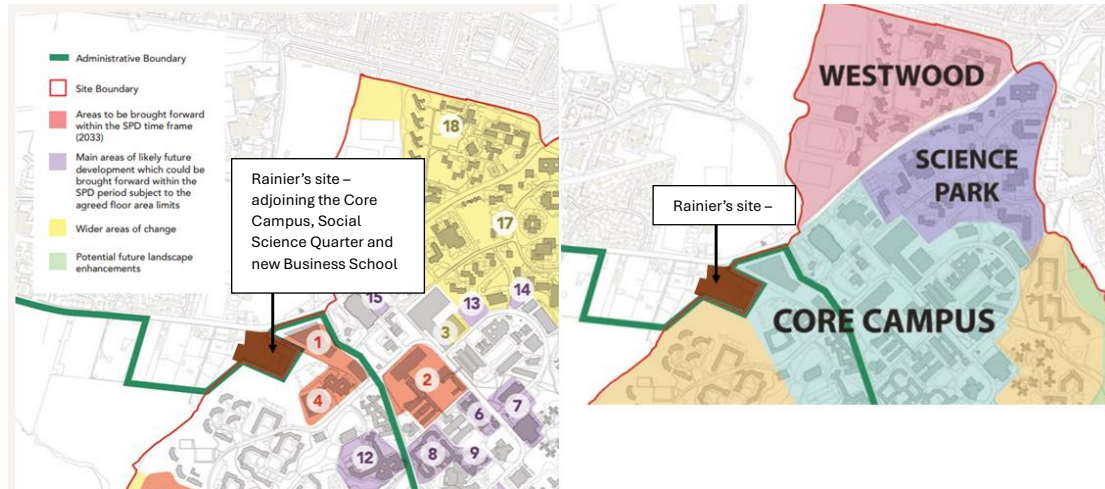
- There has been a material change in circumstances since the safeguarded land area was designated and the 2017 Local Plan adopted creating an even more urban context surrounding Site WES-003-23. Land to the north, east and south of the Site was removed from the Green Belt as part of the Warwick District Local Plan Review 2011-2029 (adopted September 2017). New development has also been built and consented associated with the University of Warwick to the south of the Site, comprising new halls of residence west of Scarman Road (Sherbourne Residences), and new Social Sciences Quarter (consented, ref. W/23/0195) adjoining the Site's eastern boundary.
- Given that Site WES-003-23 comprises Previously Developed Land (PDL) and is essentially contained by development on all sides – comprising the University to the south and east, St John's Church to the west and Westwood Heath Road to the north – it would undoubtedly constitute a Green Belt 'island' which the safeguarded land policy is seeking to avoid (LPR, paragraph 9.5). The Site would also not meet the five Green Belt purposes established in national planning policy (NPPF143), further evidenced by the enclosed Green Belt assessment (EDP, February 2025 – **Appendix A** to these representations) and in response to Policy GB1.

Continuing to safeguard Rainier's Site under Policy DS2 cannot be justified (2023 NPPF test of soundness 35b) and a failure to formally remove it from the Green Belt conflicts with national planning policy (2023 NPPF test of soundness 35d).

As well as Site WES-003-23 performing no Green Belt function, there is an evidential *need* to allocate the Site for development (specifically new Purpose Built Student Accommodation [PBSA], aligned with the University of Warwick Supplementary Planning Document (SPD, adopted 3rd December 2024 – **Appendix B** to these representations). The SPD is clear that the University anticipates "*providing 1,200 net additional student bedspaces on or close to campus, either through direct development or in conjunction with private developers (what is known as Purpose Built Student Accommodation).*" (SPD, page 14).

Site WES-003-23 adjoins the core campus, as demonstrated in Figure 1, and is therefore sustainably located by foot and cycle to University.

Figure 1 Extracts from SPD Plan 13 and Plan 14 to show the location of Rainier's Site adjoining the Core Campus



Site boundary indicative, refer to Appendix A for detailed boundary

Support and recognition of the contribution that the University makes to the sub-regional economy is set out in the Policy DS2 6b of the LPR.

The provision of new PBSA will be central to meeting Coventry's housing needs. This is already central to Policy H10 in the adopted Coventry Local Plan, with the need for PBSA reiterated in the Housing Topic Paper underpinning the LPR, with students favouring this accommodation over HMO-type provision.

As well as supporting the ongoing growth and development of Coventry as a centre for higher education – linked to both Coventry and Warwick Universities - the allocation of specific sites for PBSA close to existing campuses will help to reduce/alleviate the loss of existing housing stock to HMO accommodation.

The allocation of specific sites for PBSA will also support the government's objective to boost the supply of homes and ensure that *"the needs of groups with specific housing requirements are addressed"* under NPPF60.

(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.

The policies map should be amended to re-draw the safeguarded land designation to explicitly exclude the FH Roofing site (2024 HELAA Ref. WES-003-23), to address the soundness reasons raised above.

(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 explain and support why Policy GB2 needs to be reviewed to ensure a policy which is justified and consistent with national Green Belt policy.

(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.

Part B – Please use a separate sheet for each representation

Name or Organisation: Marrons on behalf of Rainier Real Estate Ltd

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

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.

In response to Policy GB2, Rainier Real Estate explains why the extent of the safeguarded land designation for Land South of Westwood Heath Road needs to be reviewed, to ensure it is justified and consistent with national planning policy, by removing 2024 HELAA Ref. WES-003-23 / FH Roofing from this designation.

In reviewing the safeguarded land policy for this area there would be no justification whatsoever to return the Site to the Green Belt.

The Site makes no contribution to Green Belt purposes in this location and would not compromise the fundamental aim of preventing sprawl and protecting openness in 2023 NPPF142-143, as set out in the accompanying assessment (EDP, February 2025).

2023 NPPF147 is clear that when reviewing Green Belt boundaries the need to promote sustainable patterns of development is fundamental, alongside giving priority to previously developed land. Site WES-003-23 aligns with both these national policy objectives, with the Council's 2024 HELAA evidence identifying the sustainability and accessibility of the Site in particular given its proximity to Warwick University.

2023 NPPF148 sets out the requirements for reviewing Green Belt boundaries whereby in the case of WES-003-23 the Site is not necessary to keep the Green Belt permanently open for the reasons explained above and a new boundary can be clearly defined using physical features that are readily recognisable on the ground and likely to be permanent (2023 NPPF148f). These permanent and physical features are significant and include Warwick University to the south and east, St John the Baptist Church and Featherbed Lane to the west, complemented by the extent of the Site's own boundary landscaping. The level of containment within the existing built-up area, urbanising features and landscaping mean that the Site can be released without compromising the openness of the wider Green Belt. All these features are existing and can provide a Green Belt boundary which endures beyond the plan period, in support of 2023 NPPF148(e).

Whilst recognising that the LPR is being examined under the December 2023 NPPF, there is a clear and significant direction of travel in national Green Belt policy through the December 2024 version and accompanying Planning Practice Guidance published on 27th February 2025. Under this new policy, even if the Site were not formally removed from the Green Belt through the LPR (as is requested by Rainier), it would clearly fall within the definition of 'grey belt' under the definition provided by Annex 2. The Site does not strongly contribute to purposes (a), (b) or (d) in NPPF143 and the application of policies in NPPF Footnote 7 would not apply, as explained in the enclosed assessment (EDP, February 2025, **Appendix 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.

(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

(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:

To further explain the fundamental matters raised in these representations.

(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.

Part B – Please use a separate sheet for each representation

Name or Organisation: Marrons on behalf of Rainier Real Estate Ltd

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

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 is unsound with specific respect to the need to allocate additional brownfield previously developed sites, as part of a positively prepared plan (2023 NPPF test of soundness 35(a) and that accords with national planning policy (test of soundness 35(d)).

2023 NPPF123 requires that “*Strategic policies **should** set out a clear strategy for accommodating objectively assessed needs, in a way that **makes as much use as possible of previously developed land**” (emphasis added).*

The prioritisation of brownfield Previously Developed Land (PDL) is reiterated through 2023 NPPF124(c) and (d).

As explained in response to Policy GB1 and GB2, Rainier Real Estate control 2024 HELAA Ref. WES-003-23 / FH Roofing, a brownfield PDL Site to the south of Westwood Heath Road, adjoining the University of Warwick’s Core Campus. This Site should be removed from the safeguarded land designation, removed from the Green Belt, and formally allocated for a development of a 400-bed Purpose Built Student Accommodation (PBSA).

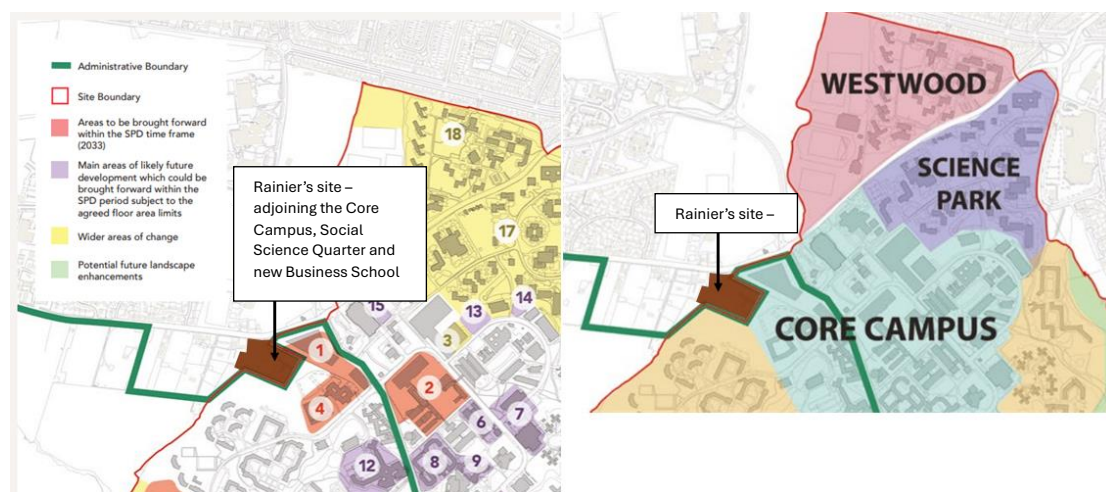
The need and justification for reviewing Policy GB1 and GB2 is explained in Rainier's accompanying representations to those policies. Not only would it support achievement of national and local policy objectives which require priority to be given to use of PDL, the Site would also assist in meeting the needs of specific groups required by 2023 NPPF60, as well as address the findings of the LPR's Housing Topic Paper.

The allocation will help to reinforce Coventry's strengths as a centre for higher education, with the LPR recognising the key sub-regional role of the University of Warwick in Policy DS2 6b.

There is an evidential *need* to allocate the Site for PBSA, aligned with the University of Warwick Supplementary Planning Document (SPD, adopted 3rd December 2024 – **Appendix B** to these representations). The SPD is clear that the University anticipates “*providing 1,200 net additional student bedspaces on or close to campus, either through direct development or in conjunction with private developers (what is known as Purpose Built Student Accommodation).*” (SPD, page 14).

Site WES-003-23 adjoins the core campus, as demonstrated in Figure 1, and is therefore sustainably located by foot and cycle to University.

Figure 1 Extracts from SPD Plan 13 and Plan 14 to show the location of Rainier's Site adjoining the Core Campus



Site boundary indicative, refer to Appendix A for detailed boundary

A further benefit is that the allocation of specific PBSA directly adjoining the University Campus will help to reduce the loss of existing housing stock to HMO conversions in other parts of the City.

The Site is suitable and deliverable for allocation, as demonstrated through the Vision document enclosed at **Appendix C**. The Scheme will improve the character and appearance of the area on what is currently a builder's yard, with a design and masterplan sensitive to views along Westwood Heath Road towards St John's

Church, complementary to what is planned as part of the consented Social Sciences Quarter to the east.

Rainier Real Estate has an agreement in place with the landowner to bring the Site forward as soon as possible, with Rainier’s commitment to bringing the Site forward evidenced through formal pre-application engagement with the Council in Q4 of 2024, and discussions ongoing into 2025.

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

- 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 should be amended as follows, to introduce an additional allocation for Land South of Westwood Heath Road (FH Roofing Site).

Proposed Change

Table 6.2 - Site Allocations for Housing

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses	HELAA Ref.
H2: 39	FH Roofing	Westwood	400 (PBSA)	PDL	<p><u>Development of c. 400 PBSA to address needs identified by the University of Warwick in the University of Warwick SPD (December 2024).</u></p> <p><u>Will complement consent for the Social Sciences Quarter on land to the east.</u></p> <p><u>Existing vegetation and landscaping to the south of the site to be retained as part of the masterplan.</u></p>	WES-003-23

(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.

- 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)

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:

To further explain the fundamental matters raised in these representations.

(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.

Part B – Please use a separate sheet for each representation

Name or Organisation: Marrons on behalf of Rainier Real Estate Ltd

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

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 H6 part 5 exempts development of Purpose Built Student Accommodation (PBSA) within the campus from the provision of a commuted sum towards 20% affordable housing provision. The supporting text to Policy H6 (para. 6.27) explains that the basis for the policy concerns PBSA competing for residential land, *“much of which is required to deliver the urban focussed spatial strategy of the reviewed Local Plan.”* On which basis PBSA outside the campus is expected to contribute towards the affordable stock which is needed to retain graduates and young professionals who work in the City.

However, clarification is needed in Policy H6 and Policy H10 to ensure that the policy is effective (2023 NPPF test of soundness 35(c)) in realising what the Council is seeking to achieve – to maximise PBSA provision at campus rather than at alternative locations within the City.

Fundamentally, it needs to be recognised that existing Campuses may not be able to meet PBSA needs in full. The University of Warwick, for example, has explicitly stated that it may need to look beyond the campus to adjoining sites to meet its needs.

The University of Warwick is looking to deliver 1,200 new bed spaces “on or close to campus, either through direct development or in conjunction with private developers...” (University of Warwick SPD, adopted December 2024, page 14, emphasis added).

The fact that PBSA needs to be located “*within or immediately adjacent to*” the campus is explicitly set out in part 1 of Policy H10.

To align the Council’s policy intent set out in para. 6.27, part 1 of Policy H10, and to reflect the specific objectives of the University of Warwick to look beyond its boundaries to deliver PBSA, Policy H6 needs to be amended.

The amendments proposed by Rainier Real Estate would not only exempt PBSA from affordable housing commuted sums within the campus, but also PBSA provision on land *immediately adjacent to* the campus. This will help to truly incentivise PBSA closest to the campus as the Council is seeking to achieve. It will have added sustainability benefits by housing students closest to campus too.

The proposed changes to the policy are explained in the following section.

(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 H6: Affordable Housing - Part 5

“5. On sites providing 25 bed spaces or more of Purpose Built Student Accommodation (PBSA) outside of **the Campus (or on land immediately adjacent to the Campus)** as defined at policy H10, a commuted sum will be required in lieu of on-site 20% affordable housing provision.”

(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

(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:

To further explain the fundamental matters raised in these representations.

(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.