



Coventry City Council

Ref:

**(For official use only)**

## **Coventry Local Plan Review Regulation 19**

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

**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/planningpolicyprivacynote](http://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.**

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**Part A**

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**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	Ms	Mr
First Name	Katie	Max
Last Name	Saunders	Morgan
Job Title (where relevant)		Graduate Planner
Organisation (where relevant)	Richborough	Marrons
Address Line 1		Bridgeway House, Bridgeway, Stratford upon Avon
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  H2

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes <input type="text"/>	No <input type="text"/>
4.(2) Sound	Yes <input type="text"/>	No <input checked="" type="text"/> X
4 (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 H2: Housing Allocations**

Not sound

1. Policy H2 1. and Table 6.2 identifies the sites to be allocated for housing development. Sites H2:31 and H2:36 do not meet the definition of Developable as set out in the NPPF Glossary and should be removed.
2. H2:31 Paybody Building, Stoney Stanton Road is proposed for allocation for 280 dwellings. However, the Council's own HELAA assessment identifies that the site is a current NHS facility which is likely to become available for redevelopment for residential based use or healthcare based use. The narrative concludes that should the site

become available, it is a suitable site for allocation. Given this uncertainty, there is not a reasonable prospect that the site will come forward for housing in the CLPR Plan Period, if at all.

3. H2:36 Land at Spon End is proposed for allocation for 750 dwellings. However, it is noted that this would be facilitated by the demolition of 450 existing dwellings. Thus, the net increase of 300 dwellings should be accounted for, not the entire 750 dwellings as set out.
4. Table 6.2 should be amended to remove H2:31 and amend the total dwelling column for H2:36 to 300 dwellings.
5. **Policy H2: Housing Allocations – H2:1 Keresley SUE**

Not sound

6. Policy H2:1 and Table 6.2 re-allocates the Keresley SUE for 3,100 dwellings to be completed within the Plan period. The policy is however not justified as there is more capacity within the allocation than 3,100 dwellings.
7. The Housing and Economic Land Availability Assessment (HELAA) (November 2024) confirms that as of 30<sup>th</sup> September 2024, circa 2,500 dwellings have been granted planning permission, with circa 600 dwellings remaining to come forward. As at February 2025, the approval of schemes FUL/2020/0748 (for 388 dwellings) and PL/2023/0001155/OUTM (for up to 40 dwellings) has meant that now circa 2,920 dwellings have planning permission with circa 180 dwellings remaining to come forward.
8. The total dwelling capacity has been informed by the Urban Extension Design Guide SPD (2019), which includes an indicative masterplan of the SUE which identifies development boundaries. The remaining land within these development boundaries that does not already have planning permission includes land currently used for sports pitches (Coventry Colliery and Keresley Sports and Social Club), and a golf driving range (John Reay Golf Centre). There is no evidence to that these sites have been put forward through the call for sites, or that they are likely to become available during the Plan period. It is unclear therefore whether the 3,100 dwellings can be met based on the indicative masterplan within the SPD.

9. However, Richborough are promoting land off Fivefield Road (HELAA Ref: BAB-012-24) which is located within the Keresley SUE for circa 350 dwellings. The land is identified as Openspace/Visual Amenity Space on the indicative masterplan within the SPD and therefore has not contributed towards delivering the 3,100 dwellings or higher figure that now is required to address shortfalls in supply to meet the requirement.

10. The land is not publicly accessible, save for one footpath around the edge of the site. The land also falls adjacent to residential development under construction to the south and has limited visual amenity. There are no opportunities for sport or recreation as the land is in active agricultural use, and there are no proposals as part of the development of the allocation for the land to be brought into use as openspace. Its public value is therefore limited to certain parts of the site around the edge and these areas of value can be maintained and enhanced through careful masterplanning at the application stage.

11. There is no policy basis for the land to be open space. Applying the Council's Open Space SPD, the permitted 2,927 dwellings will produce 7,025 people (2.4 per dwelling) indicating a minimum Green Space requirement of 23.39 ha. However, the approved developments will provide 41.94 ha of Green Space as illustrated in the table below. Furthermore, the sites key open space assets, including Hounds Hill and the ponds across the site, will be maintained and enhanced to provide high quality, accessible green space thus further enhancing provision.

Site Name	Site Ref	Developer	Dwellings	Open Space (ha)
Fivefield Road & Tamworth Road	OUT/2019/0022 RMM/2022/0679 RMM/2022/0633 RMM/2022/0636 RMM/2022/0678	Bellway Homes	550	10
Penny Park Lane & Bennetts Road	FUL/2020/0748	David Wilson Homes	388	6.825
Sandpits Lane, Bennetts Road & Tamworth Road	OUT/2014/2282 RMM/2019/1030 RM/2020/2399	Lioncourt	800	12.6
Thompsons Road & Bennetts Road North	OUT/2019/0484 RMM/2022/2615 RMM/2022/1982	Lioncourt	500	5.7
Watery Lane-south	OUT/2019/2277 RMM/2021/0314	J G Gray Limited, Gillitt Properties Limited & The Newcombe Estates Company Limited	40	0.2375

Land West of Bennetts Road South	OUT/2022/0713 & PL/2024/0000246/RESM	Richborough Vistry	260	1.82
Land between Fivefield Road	OUT/2022/0712 & PL/2023/0001888/RESM	Richborough Countryside Partnerships	290	4.31
Hall Hill Cottage Fivefield Road	PL/2023/0001155/OUTM	Seven Homes	40	No specific area- 0.21ha at 15% of total site area
Bennetts Road, Coventry	FUL/2020/2615	Partner Construction	56	No specific area – 0.24 ha at 15% of total site area
		Totals	2,927	41.94ha

12. The land is free from environmental constraints that would prevent its residential development. NPPF Chapter 11 promotes the effective use of land in meeting the need for homes and encourages optimising densities in sustainable locations. It is appropriate therefore for the capacity of the Keresley SUE in Table 6.2 to be increased to reflect the land available off Fivefield Road.

13. Appendix 1 of the SPD states “as the SUE evolves through the planning process and development stages, this Indicative Masterplan will be updated to reflect approvals and delivery.” The indicative masterplan should therefore be updated to reflect the need for additional housing, and the availability of the land for development.

14. Along with being a suitable site, the Land off Fivefield Road is both achievable and deliverable. Richborough has a proven track record of successful delivery within the Keresley SUE, evidenced through the OUT/2022/0713 and OUT/2022/0712 sites contributing 550 dwellings towards Coventry’s housing supply, reinforcing the achievability of the Fivefield Road site. Works have already begun on preparing a planning application, demonstrating clear intent for delivery.

15. Policy H2:1 and Table 6.2 should be amended to increase the allocated capacity of the Keresley SUE (H2:1) to reflect the availability and suitability of land off Fivefield Road (HELAA Ref: BAB-012-24). The Council will also need to consider updating its Urban Extension Design Guide SPD.

(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.

Table 6.2 should be amended to remove H2:31 and amend the total dwelling column for H2:36 to 300 dwellings.

Policy H2:1 and Table 6.2 should be amended to increase the allocated capacity of the Keresley SUE (H2:1) to reflect the availability and suitability of land off Fivefield Road (HELAA Ref: BAB-012-24). The Council will also need to consider updating its Urban Extension Design Guide SPD.

(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:

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

***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.***