

**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 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*

**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

First Name

Last Name

2. Agent's Details (if applicable)

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

(where relevant)

Nuneaton and Bedworth Borough
Council

Town Hall

Coton Road

Nuneaton

CV11 5AA



Part B – Please use a separate sheet for each representation

Name or Organisation: Nuneaton and Bedworth Borough Council

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

Paragraph

Policy

4. Do you consider the Local Plan Review is:

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

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.

Nuneaton and Bedworth Borough Council (NBBC) has worked with Coventry City Council (CCC) on a range of cross boundary strategic matters in accordance with the Duty to Cooperate. The NBBC Borough Plan Review (BPR) is at an advanced stage of preparation with the Regulation 19 Examination in Public hearings undertaken in July to October 2024.

Housing

Policy DS1: Overall Development Needs identifies a need for 29,100 homes. The need is determined from the 2021 Coventry & Warwickshire HEDNA. Given the relationship between local authorities within the Coventry & Warwickshire Housing Market Area, a consistent approach provided by the HEDNA is supported.

Employment

Policy DS1: Overall Development Needs identifies a need for 105 ha of employment land (including qualitative replacements). The policy sets out that 60 ha of employment land can be found within the CCC administrative area. The 60 ha comprises of existing allocations, commitments and completions. As the

HEDNA and Alignment Paper consider the Plan period starting in 2021 it is logical that completions which occur post 2021 and commitments which have yet to deliver should be included in the supply. NBBC is therefore supportive that these sources of supply are included in the overall supply position.

The policy states that it is not possible to deliver additional employment land within the CCC administrative boundary and the shortfall will be met through the Duty to Co-operate. NBBC has recently undertaken a 'Call for Employment Sites' exercise. Of those received one site was located outside of the Green Belt. One 6 ha site was submitted which is located outside of the settlement boundary to the north of the Borough and would potentially serve as extension to the proposed MIRA south site. The MIRA site is a regional employment site and so would not serve the local employment needs of Coventry. The second site submitted outside of the Green Belt poses significant deliverability issues. The NBBC Call for Sites exercise establishes that there is no suitable employment land in the Borough which matches CCC preferred approach to allocate non-Green Belt sites.

CCC has selected a preferred approach towards development to protect all Green Belt and to address the shortfall through the Duty to Cooperate. CCC has not engaged with NBBC to understand the availability of land to meet unmet need that has been generated by the preferred approach. NBBC contends that without understanding the availability of land in neighbouring authorities or the wider sustainability impacts of dispersing local employment need, CCC preferred approach is flawed. The approach towards employment need is not positively prepared as there is no understanding of capacity to accommodate Coventry's employment land need in neighbouring authorities. The shortfall is deferred to other Local Plans or through Review Policies.

NBBC believes that CCC should, in the first instance, provide for its locally derived need within CCC administrative boundaries. NBBC contest that it is not possible to find additional employment land supply within the city boundary – see Policy JE2.

Duty to Cooperate

This is a Regulation 19 consultation and represents the last stage of public engagement before submitting the plan to the Planning Inspectorate to appoint an independent Inspector to undertake Examination in Public (EiP). The purpose of this stage and subsequent examination is to consider whether the Plan complies with the legal requirements, the Duty to Co-operate and whether the Plan is legally compliant and meets the tests of 'soundness' set out in the NPPF paragraph 35.

Housing DtC

CCC has worked with other Local Authorities in the Housing Market Area on the Coventry and Warwickshire HEDNA. CCC confirms it is able to meet all of its housing need within its administrative boundaries. Therefore, no approach has been made to neighbouring authorities to assist with unmet housing need.

Employment DtC

CCC have worked with other authorities in the FEMA to establish an evidence base for employment needs. The West Midlands Strategic Sites Study (WMSESS) provides the need for regional strategic sites. Coventry is identified as an Opportunity Area within the WMSESS along with NBBC and Rugby BC (WMSESS). The prioritised junctions identified in the report are located within Rugby BC administrative area. CCC should seek to formalise the findings of the WMSESS through a Statement of Common Ground. The sub-regional HEDNA provides employment land and sets out a figure for each local authority in the sub-region. CCC has adopted a strategy to protect Green Belt sites and rely on neighbouring authorities to help meet any unmet need. CCC has not engaged with neighbouring authorities to assess if sufficient non-Green Belt sites are available, or if there are suitable Green Belt sites. There has been no groundwork regarding the achievability of the approach which could be formalised through a Statement of Common Ground. In the absence of any work being undertaken on Statements of Common Ground on such a fundamental issue the Regulation 19 consultation is premature.

(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.

CCC should engage with neighbouring authorities to assess the capacity to accommodate the employment land shortfall generated by the preferred approach. The South Warwickshire Local Plan is undertaking a Preferred Options consultation which identifies a site, 'MIS.4 - South of Coventry area' which is said could contribute towards Coventry's unmet need. North Warwickshire Borough Council has commenced work on an Employment DPD which is anticipated for submission late 2024/early 2025. Rugby Borough Council has commenced a

review of its Local Plan completing an Issues and Options consultation. NBBC believes that authorities in the FEMA are well placed to comment on the achievability of the CCC approach regarding meeting its employment land need. Statements of Common Ground will help to establish if the need can be met.

(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:

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.