## **Part B** – Please use a separate sheet for each representation

Name or Organisation: Nunea	aton and Be	dworth Borou	igh Council	
3. To which part of the Local	Plan Review	does this re	presentation	relate?
Paragraph	Policy	JE1		
4. Do you consider the Local	Plan Review	ı is:		
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes		No	
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 hearing undertaken in July to October 2024.

Policy JE1: Overall Economy and Employment Strategy states the Plan will provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period. The policy is inconsistent with the preferred approach towards employment which is to protect Green Belt land and seek to locate the shortfall derived from the approach outside of CCC boundaries. A range of employment sites to meet Coventry's local employment need has not been identified and are not readily available to meet the needs throughout the Plan period.

The policy intends that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city. NBBC supports the intention of the

policy but considers it less likely to occur if over 40% of the employment land needs to be located beyond CCC boundaries.
Sites have been omitted following the HELAA analysis which could contribute towards Coventry's local employment need. The needs of small businesses are potentially met by the Plan but not accounted for in the supply position (See Policy JE2).
(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.
Identify further sources of supply within the CCC administrative boundary. Should there still a shortfall identify where the supply will be met.

(Continue on a separate sheet /expand box if necessary)								
Please note: In your representation you should presupporting information necessary to support your modification(s). You should not assume that you wis submissions.  After this stage, further submissions may a submission, based on the matters and issues the submission.	representation and your suggested ill have a further opportunity to make only be made if invited by the							
7. If your representation is seeking a modification to necessary to participate in examination hearing seeking a modification to the seeking as the seeking								
No, I do not wish to participate in hearing session(s)  Please note that while this will provide an initial indicate.	Yes, I wish to participate in hearing session(s)							
hearing session(s), you may be asked at a later participate.								
8. To which part of the Sustainability Appraisal (SA relate?	) report does this representation							
Paragraph								
Please add any further comments relating to the SA	A report in the box below.							
(Continue on	a separate sheet /expand box if necessary)							
9. If you wish to participate in the hearing session this to be necessary:	(s), please outline why you consider							

**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.