

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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Peter"/>	<input type="text"/>
Last Name	<input type="text" value="Leaver"/>	<input type="text"/>
Job Title	<input type="text" value="Planning Director"/>	<input type="text"/>
(where relevant)		
Organisation	<input type="text" value="Nurton Developments Ltd"/>	<input type="text"/>
(where relevant)		
Address Line 1	<input type="text" value="11 Waterloo Street"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text" value="Birmingham"/>	<input type="text"/>
Post Code	<input type="text" value="B2 5TB"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

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

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.

This paragraph, under the heading of Provision of Employment Land and Premises, refers to a residual need for development land for strategic big box industrial and warehouse units of 136 - 311 ha across Coventry & Warwickshire for the period 2021 to 2041. The source of this need is the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (the Alignment Paper), which was produced by Icení in September 2024 and updated in November 2024.

Paragraph 4.11 of the Alignment Paper breaks down the sub-regional need into three areas. These areas correspond with those denoted in the WMSESS and are as follows: -

- Area 5: North Warwickshire – 50 to 100 ha.
- Area 7: M6/A45/A46/M45 Coventry & Rugby – 9 to 84 ha.
- Area 8: A46/M40 Warwick – 75 to 125 ha.

Area 7 takes in all of Coventry City, Rugby Borough and Nuneaton & Bedworth Borough. It also takes in parts of Warwick District and North Warwickshire Borough that form part of the wider Coventry city region. Geographically, it is a very important area for the wider West Midlands economy, being the home for a number of strategic sectors (e.g. automotive and aerospace) and international companies (JLR, Severn Trent, Meggitt, and soon Frasers).

Area 7 is also located in the heart of the Golden Triangle – the sweet spot for large scale distribution and logistics in the UK. Recent completed developments at Coventry Gateway, Prologis Park (Ryton-on-Dunsmore), Faultlands Park (Bedworth) and Symmetry Park (Rugby) have demonstrated the strength of the market for large scale logistics in this area. Further evidence for the strength of the general area is provided by the rapid take up of large-scale extensions to Magna Park and DIRFT, both of which are located on the boundary to Rugby Borough.

NDL has analysed completions of land for the big box market in Area 7 over the last three years at the principal strategic sites. This is presented below in Table 1.

Table 1 – Take-up of big box units at existing strategic employment sites in Area 7 since April 2022.

Scheme	Floor Space Developed (sqm)	Land Developed (ha)
Symmetry Park, Rugby	173,962	46.2
Faultlands Park, Bedworth	92,904	26
SEGRO, Coventry Gateway	116,971	39
Prologis Park, Ryton	45,275	16.7
Prospero, Ansty	101,477	39.8
Total	530,609	167.7

Over the last three years, 530,689 sqm has been developed on 167.7 ha of land. This equates to broadly 56 ha per annum. If land is made available, then we see no reason why this pace of development should diminish. Indeed, it could be argued that supply has been restricted and this has suppressed demand and resulting completions.

In addition, it should be noted that this period (i.e. 2022 to 2025) has seen less development activity than in the recent past because of the steep rise in interest rates since 2022. This has affected adversely development funding for all types of commercial property.

NDL has also analysed the supply of deliverable consented or allocated development land at strategic employment sites which remain available as of today in Area 7. This is presented below in Table 2.

Table 2 – Remaining Development Land at Committed Strategic Employment Sites in Area 7 as at 1 March 2025.

Scheme	Use	Developable Land Remaining (ha)
Prospero, Ansty	B2	9.2
Coton Park East, Rugby	B8	8.9
Extension to Prologis Park, Keresley	B8	5.9
SEGRO Coventry Gateway	B8	36
Padge Hall Farm	B8	32
Total		92.4

In undertaking this analysis, we have discounted a number of the sites listed in Appendix 1 of the Alignment Paper (Strategic Site Commitments) on the following bases: -

- Those sites which have been developed since 2022 (i.e. Coventry Gateway (in part), Symmetry Park, Prospero, Prologis Park, and Faultlands Park).
- Those which are clearly not deliverable (i.e. Baginton Fields – see our representations to Policy DS1).
- Those which do not meet the definition of strategic sites (i.e. Rugby Radio Station which, at 16 ha, does not meet the size threshold of 25 ha).
- Those which include large non-employment areas (i.e. the 100-ha country park at Coventry Gateway).
- Those constrained in terms of use (i.e. the Gigafactory at Coventry Airport where the planning permission is restricted to the manufacture of batteries).

NDL's detailed analysis of supply is provided in a separate schedule. This is provided in the link below.

[Analysis of A1. Strategic Sites Commitments](#)

These discounts reduce the committed supply in Coventry and Warwickshire from 655.8 ha in 2022 to 243 ha as of today. The corresponding reduction in Area 7 is from 560.3 ha to 92.4 ha. The latter figures include permitted development land at Padge Hall Farm (gross area of 64 ha, development area of 32 ha), which was granted planning permission in December 2023 and has been added to supply (paragraph 4.10 of the Alignment Paper) in generating the final figures for residual need for Areas 5, 7 and 8.

If the remaining supply in Area 7 as of today (i.e. 92.4 ha) is added to the projected need (9 - 84 ha) this gives a total potential requirement for the rest of the study period (2025 to 2045) of 101.4 - 176.4 ha. **At the current pace of development (i.e. 56 ha per annum), this represents just 1.8 - 3.2 years of supply.** Using the upper range identified by the Alignment Paper, this will provide for up to 2028 only, **leaving no land available for the remainder of the study period (i.e. from 2028 to 2045).**

Clearly, this level of supply is wholly inadequate. It will restrict development in a dramatic fashion. It will have obvious and severe implications. It will act as a direct barrier to growth of the local and sub-regional economy and will have indirect consequences on the wider West Midlands. This outcome would be the polar opposite to what current and emerging economic strategy and planning policy is seeking to achieve.

NDL's analysis of the need for strategic land comes to a completely different conclusion. The Alignment Paper refers to a total gross strategic need for sites for Coventry and Warwickshire of 833 - 1,017 ha (Table 3.3). The former figure is derived by a completions model; the latter is derived by a replacement model.

This gross need covers the period from 2021 to 2045. It breaks back to 34.7 - 42.3 ha per annum. To compare against current levels of supply (as at March 2025), we have factored this need down for the shorter period 2025 to 2045. This reduces gross need to 694 - 845 ha for the sub-region.

Current supply as at 1 March 2025, as analysed by NDL, is 243 ha. As such, **NDL has computed the residual need for Coventry and Warwickshire being 451 ha (i.e. 694 less 243) - 602 ha (i.e. 845 less 243).**

As set out above, the actual pace of development in Area 7 over the last three years has been significantly greater than the projected gross need for the wider sub region – i.e. 56 ha per annum compared to 34.7 - 42.3 ha per annum. As such, it is clearly arguable that the residual need for Coventry and Warwickshire should be significantly greater than 451 – 602 ha for the remainder of the study period (2025 to 2045). If the pace of development in Area 7 continues at the same rate as the last three years (i.e. 56 ha per annum), this will project a gross need for the remainder of the study period of 1,120 ha (i.e. 56 X 20) for Area 7. This will lead to residual need of 1,027.6 ha once existing committed supply of 92.4 ha is deducted.

This analysis demonstrates how unrealistic the projection of residual need assumed by the Alignment Paper – 9 to 84 ha for Area 7 – is. It clearly has not been sense-checked in terms of the realistic yield of land from committed supply or the latest data available on market demand.

For these reasons, NDL contends that its projection of 451 – 602 ha of residual need for strategic employment land for Coventry and Warwickshire should be expressed as a bare minimum. Moreover, consideration should be given in any update to the WMSESS and/or the Alignment Paper to requiring the delivery of a much higher level of suitable development land, particularly for Area 7.

This would have a directly positive effect on the sub-regional economy. **A bare minimum residual need of 451 – 602 ha would deliver 291 - 315 ha more land than the projected figures expressed in the Alignment Paper** and referenced in paragraph 5.14 of the draft plan.

Assuming a 35% site cover, this **would accommodate additional built floorspace of 1,018,500 - 1,102,500 sqm**. This, in turn, would **generate directly more than 10,000 jobs**, employing a very broad rule of thumb of 1 job per 100 sqm of floor space. **Other benefits would be indirect employment, new infrastructure and significantly increased revenue from business rates.**

Overall, NDL considers that the WMSESS which underpins the Alignment Paper is a well-intentioned piece of work. It seeks to boost the allocation of strategic sites across the West Midlands. In addition, its scope is ambitious, seeking to qualify and quantify the amount of land required for each sub-region. Its assessment of gross need is multi-layered and includes sensitivity testing.

However, in NDL's view, the study's assessment of existing supply of sites has been wholly uncritical. It has taken information provided by local planning authorities at face value. The information is out of date (based on data prior to 2022) and untested in terms of its capacity or capability to deliver built floor space. This has led to a gross over-estimation of supply and, as a consequence, an under-estimation of residual need. This is particularly prevalent in the assessment of Coventry and Warwickshire and especially so for Area 7, which takes in Coventry, its economic hinterland, Nuneaton & Bedworth and Rugby.

The resulting analysis – with a projected need of just 136 -311 ha to serve the whole of Coventry and Warwickshire – makes no sense in either economic or market terms. Instead, it serves to fundamentally undermine the principal purpose of the study – i.e. **the allocation of sufficient number of sites to serve the sub-regional economy for the next 20 years.**

NDL considers this to be a lost opportunity and is very concerned about the potential consequences on the sub-regional economy. As such, NDL requests that the study – and the associated Alignment Paper – is reviewed and updated as soon as is practically possible.

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.

For the reasons set out in response to Question 5, NDL requests that the WMSESS, and the associated Alignment Paper, is reviewed and updated as soon as is practicably possible.

In the meantime, NDL suggests that paragraph 5.14 refers to our alternative analysis for the residual need for Coventry and Warwickshire, with this being a bare minimum of 451 – 602 ha.

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

No comments.

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:

The representations raise some serious and complex matters. Our participation at the relevant hearing sessions should help the appointed inspector(s) to gain a full appreciation of the issues involved.

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.