

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*

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

3.10	to	3.15
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 Policy

DS1

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.

This representation concerns the employment land policy elements of Policy DS1 – principally Items 1b, 1c and 3.

Nurton Developments Limited (NDL) welcomes the acknowledgement under Item 3 that it is not possible to deliver all of the identified need for employment land within the City's boundaries. NDL welcomes further that the Council commits to work with its neighbouring authorities to ensure that these needs are met elsewhere within the Functional Economic Market Area. However, NDL is concerned that the draft Plan, and associated evidence, under-estimates the need for employment land for Coventry and its sub-region and over-estimates the ability of current supply to meet this need.

Item 3 refers to a local employment land need for Coventry of 105 ha over the period 2021 to 2041. This need excludes the need identified for big box units on strategic employment sites. This is dealt with separately (and covered by our representations in respect of paragraph 5.14 of the draft Plan).

As at 31 March 2024, the current supply of employment land (excluding that proposed to contribute to big box need – see below for more details) is 60.2 ha (reference Table 5.1 of the draft Plan). This equates to a shortfall of 45 ha (reference paragraph 3.14 of the draft Plan).

The need for 105 ha was projected by the Coventry & Warwickshire HEDNA – West Midlands Strategic Employment Sites Study (WMSESS) Alignment Paper. This study, produced in September and updated in November 2024, seeks to align the findings of the Coventry & Warwickshire HEDNA (November 2022) and the regional wide WMSESS (September 2024). All three studies were produced by the consultants Icenl.

Previously, the 2022 HEDNA identified a need for industry and non-strategic warehousing for Coventry of 147.6 ha over the same period. This is 40% greater than the need projected by the Alignment Paper. The corresponding reduction to 105 ha in the Alignment Paper does not seem to be credible and is not explained or commented upon by the draft Plan or associated evidence. Nor is it supported by the most recent data on take-up or market commentary.

Table 5.1 of the draft Plan provides a breakdown of the components of local employment land supply (i.e. excluding the big box market). It is provided below for ease of reference.

Table 5.1 – Class B2 and B8 local employment land supply components for Coventry

Supply components	Site size (Ha)
Completions 2021 – 2024*	25.4
Committed supply	6.2
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)**	28.6
Total	60.2

The top line refers to completions of 25.4 ha over the three years from April 2021 to March 2024. This breaks back to 8.5 ha per annum. Projected over 20 years – the plan period – this would derive a base need of 169 ha (i.e. 8.5 x 20). The HEDNA adds a margin of flexibility equating to five years' take up. Adopting the same methodology, this would add a further 42.5 ha (i.e. 8.5 X 5) to the base need (of 169 ha) and give a **total projection of need of 211.5 ha**. Assuming a supply of 60 ha, **this represents a shortfall of 151.5 ha**.

NDL contends that this figure would be a much more robust and positive basis for the City Council to plan the economic strategy for the sub-region with its neighbouring local authorities. It would also align much better with market sentiment, as reported by the Employment Land Review (SPRU – August 2024). This study refers to: -

- A low industrial vacancy rate of 3.17% suggesting high demand and constrained supply (paragraph 0.3).
- Stakeholders reporting growth in the warehouse and distribution sectors and a shortage of small and medium-sized units (paragraph 0.4).
- The importance of collaborating with neighbouring authorities to manage land availability constraints (paragraph 0.8).

Item 1b of Policy DS1 refers to a minimum of 60 ha to be provided to meet local needs. NDL considers this should be a maximum, rather than a minimum, figure. Principally, this is due to the constrained nature of Coventry, with a densely built-up conurbation surrounded by a collar of Green Belt. As such, there is very limited opportunity for new windfall sites to come forward during the plan period. In addition, some identified sites in the supply may not be delivered because of site constraints, lack of availability, or competing interest (e.g. housing).

According to Table 5.1 of the draft Plan, 25.4 ha of the overall supply of 60.2 ha has already been completed (as at March 2024). This leaves a residue of just 34.8 ha for the remainder of the plan period.

Item 1c of Policy DS1 refers to 25 ha being provided at Baginton Fields to contribute to the sub-regional need for big box development. It should be noted that this site is already counted as part of the committed supply by WMSESS and the Alignment Paper. As such, if delivered, it will not contribute to meeting the residual need of 136 ha – 311 ha for the sub-region identified by paragraph 5.14 of the draft Plan.

In any event, the site is clearly not deliverable for a number of reasons, as follows: -

- It was allocated in the 2017 adopted Coventry Development Plan but has yet to come forward for development.
- It is heavily constrained by existing uses. These include a primary school and separate playing fields which would require relocation.
- It contains a large woodland and a designated Local Nature Reserve.
- Completion of the wider road improvements (to serve Coventry Gateway and JLR at Whitley) has fettered the access options for the site. The only feasible access would be through third party land and crossing the River Sowe.
- Part of the site lies in the floodplain to the River Sowe.

There seems to be no appetite from the principal landowners (including the third party) to take this site forward. Despite being allocated for 8 years, no planning application has been submitted. No marketing has been undertaken either. NDL does not see this site being delivered and it should be de-allocated and removed from the figures provided for supply.

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 our response to Question 5, NDL considers the following changes are necessary to make Policy DS1 sound: -

- Item 1b – a “*maximum*” of 60 ha to replace a “*minimum*” of employment land to meet local needs.
- Items 1c – remove reference to Baginton Fields.
- Item 3 - “*211.5 ha*” of employment land to replace “*105 ha*” to meet Coventry’s local employment land needs for the period 2021 to 2041.

Associated changes should be made to paragraphs 3.14 and 3.15, as follows: -

- Paragraph 3.14 – “*maximum of*” to be inserted before “60 ha”.
- Paragraph 3.14 – “*shortfall of 45 ha*” to be replaced by “*minimum shortfall of 151.5 ha*”.
- Paragraph 3.15 – removal of the second sentence which refers to Baginton Fields.
- Paragraph 3.15 – removal of “*further*” in the last sentence.

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.

(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:

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.