

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 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.

NDL welcomes the commitment of the City Council to support the preparation of joint strategic evidence to enable the successful delivery of regeneration and economic growth across the sub-region (Item 3 of Policy DS2). This includes support to deliver new sustainable development that may straddle or adjoin the City's administrative boundaries (Item 4).

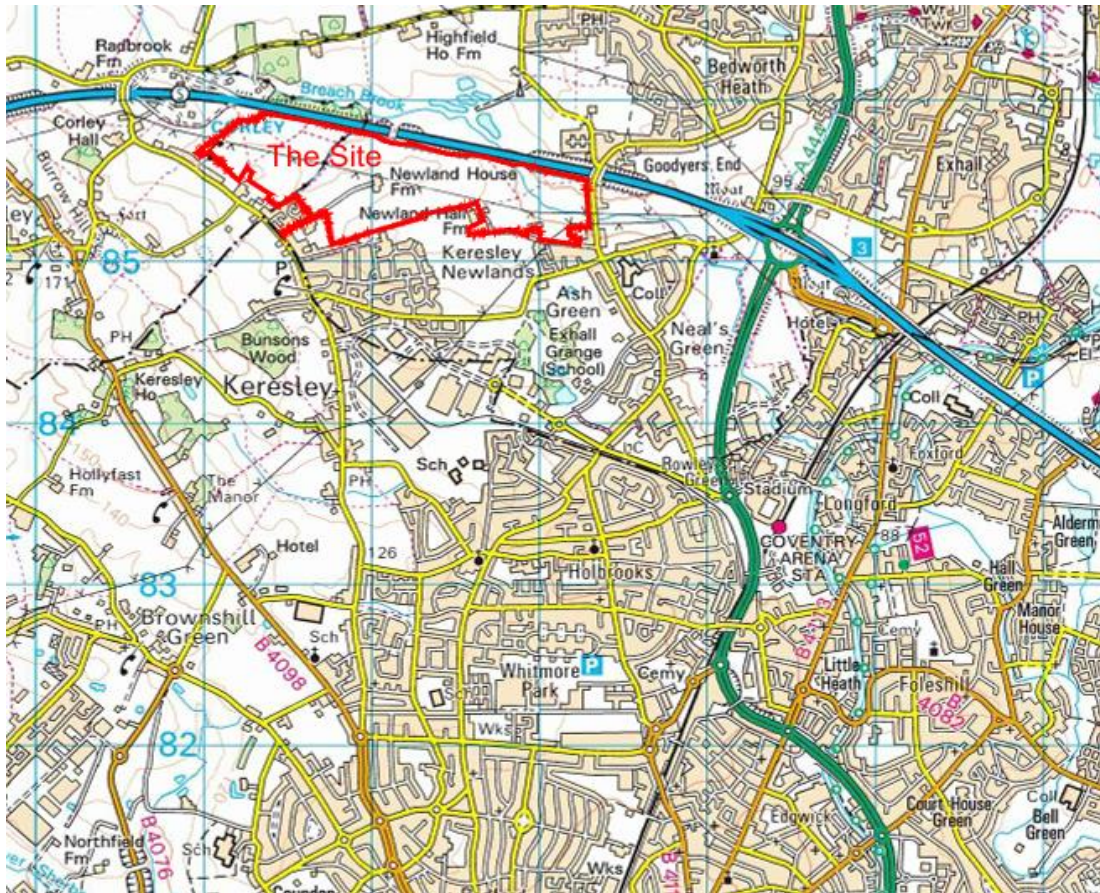
Moreover, Item 5 to Policy DS2 states that the Council will continue to work proactively with all relevant partners to enable the delivery of new development on sites that cross or are adjacent to administrative boundaries. Item 6 then refers to a number of sites which contribute to the sub-regional economy. These include some outside the City's boundaries as follows: -

- The University of Warwick (in part).
- Coventry Gateway.
- Ansty Park.
- Proposed residential developments to the south of Coventry.

NDL supports this overall approach. Much of Coventry's recent growth has taken place, by necessity, outside the City's boundaries. Other examples include Prologis Park at Ryton-on-Dunsmore, the proposals for the Gigafactory at Coventry Airport, and Frasers' recent planning

permission for its proposed HQ campus at Ansty. We see this trend continuing for Coventry to grow.

NDL is promoting a strategic employment site just to the north of the City's boundaries, with this land falling in Nuneaton & Bedworth and North Warwickshire. The red line plan below shows the site's location and extent.



The site measures just over 100 ha and straddles the boundary between Nuneaton & Bedworth and North Warwickshire. 78.36 ha falls within Nuneaton & Bedworth. The balance – 25.51 ha – falls within North Warwickshire.

NDL submitted responses to “call for sites” exercises run by both Nuneaton & Bedworth Borough Council and North Warwickshire Borough Council last autumn. These submissions can be provided on request.

The promotion of this strategic employment site responds to three particular issues and opportunities: -

- The recognised shortfall of employment land, particularly for strategic industrial and warehousing land, serving Coventry, Nuneaton & Bedworth, North Warwickshire and the wider sub-region, against predicted need and demand.
- Consideration being given by relevant decision-making bodies to major investment in transport infrastructure to enable the future growth of Coventry and its economic hinterland.

- Balancing of future growth of Coventry so as to be located in the areas of greatest need.

The first point is considered in the separate representations we make in respect of Policy DS1 and paragraph 5.14 of the draft Plan. These argue that the identified residual need for new employment land, for both local need and sub-regional need, has been significantly underestimated and will act as a barrier against future economic growth.

With regard to the second point, an outline business case to the Coventry North Transport Package was submitted by Coventry City Council to the West Midlands Combined Authority in April 2022. It confirmed that currently funded interventions only deal with planned growth and that significant new infrastructure will be required to enable and deliver future growth.

It recommended that longer term major schemes should be investigated. Specifically, a new link road, west of Coventry, connecting the A45 to the M6, was recommended for further study. One of the options includes a new junction on the M6 at Corley Services. The potential for a new junction here was also identified by the WMSESS of May 2021.

This new junction would unlock potential development land to the north and west of Coventry. The site NDL is promoting can be accessed off this new junction, with this land forming a natural extension to the City up to the M6 motorway. It could deliver c. 400,000 sqm (4.5 million sqft) of floorspace of large floorplate buildings suitable for manufacturing, logistics & freight and data & energy storage.

With regard to the third point, large scale industrial and strategic warehousing development to the west and north west of Coventry would balance the recent and current planned growth of Coventry to the south (Coventry Gateway and the Gigafactory at Coventry Airport) and the east (Ansty Park and Frasers), which are served by the A45 and A46 respectively. Instead, it would focus development in areas of relative deprivation in north Coventry and Bedworth and help to level up the local economy.

The site is in the initial stages of promotion. NDL is about to undertake a detailed technical assessment of the opportunity the site presents and engage with relevant decision makers and stakeholders. This will include the City Council, Nuneaton & Bedworth Borough Council, North Warwickshire Borough Council, National Highways, Warwickshire County Council and West Midlands Combined Authority. This will lead to a refinement of the proposals and a more detailed view of the timescales for delivery. However, it is clear, even at this early stage of promotion, that the site is strategically well located to meet the employment land needs of the City and its sub-region.

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 considers this development opportunity north of Coventry has the potential to contribute significantly to the sub-regional economy. Specifically, it will help to meet the needs for large scale industry and warehousing in the medium to long term and enable the sustainable growth of Coventry.

As such, NDL contends that **North of Coventry** should be added to those already listed under Item 6 of Policy DS2.

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.