
Part B – Please use a separate sheet for each representation

Name or Organisation: Oxalis Planning Ltd

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

Paragraph Policy

2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(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" value="X"/>

Please tick as appropriate.

3. 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.

Policy DS2 sets out the Council's approach to the 'Duty to Cooperate'. In particular, Part 1 states that:

"Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city."

And Part 7 states that:

"The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire."

As discussed in our response to Policy DS1 within form 2, the approach to delivering development needs is unsound as there is no certain approach to delivering the entirety of the recognised employment land requirements/shortfall. In turn, Policy DS2 Part 1 would not result in the entirety of the employment land requirements being met and is therefore unsound.

Part 7 of Policy DS2 relates to Duty to Cooperate partners helping to meet the identified employment land shortfall. This is not reinforced by a Memorandum of understanding, or Statement of Common ground that is publicly available, and therefore this policy does not commit to ensuring that the identified employment land shortfall will be met.

Policy DS2 can therefore not be considered sound in conjunction with Policy DS1.

Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025.

(Continue on a separate sheet /expand box if necessary)

4. 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.

Policy DS2 should be backed by a Statement of Common Ground or Memorandum of Understanding to ensure that Duty to Cooperate partners will meet the identified employment land shortfall in Coventry or allocated sufficient sites to meet this need.

(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.

5. 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

N/A

(Continue on a separate sheet /expand box if necessary)

6. 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.

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As planning agents acting on behalf of the Landowners to promote the employment site located north of the A45, we consider it necessary to participate in hearing sessions to provide evidence in support of ensuring that Green Belt, and employment related policies are reviewed appropriately, in order to deliver the employment growth required in accordance with NPPF Section 6.

(Continue on a separate sheet /expand box if 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.