
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	(Key Evidence)	Policy	JE2
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 checked="" type="checkbox"/>

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.

Section 5 of the CCCLP sets out the Council's approach to the overall economic and employment strategy. It details that the Council will work positively and proactively with the business community in the city, inward investors, the City's two Universities, key public sector employers, partners, and neighbouring local authorities to support sustainable economic growth and job creation.

Draft policy JE2 is considered unsound in accordance with Paragraph 86 of the NPPF (as set out in the previous section), as it does not provide employment land to meet the identified employment needs.

As set out in section 5 of the CCLP, employment policies are based on the following documents, that form part of the evidence base:

- Housing and Economic Development Needs Assessment (HEDNA) (2022)
- Employment Land Review (ELR) (2024) and ELR Office Market Addendum (2024)
- Housing and Employment Land Availability Assessment (HELAA) (2024)
- West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024)
- Coventry City Council Economic Development Strategy 2022-2027
- Local Plan Review Employment Background Paper (2024)

The Iceni 'Housing and Economic Development Needs Assessment 2022' made a key conclusion that there is a need to commission a further study to specifically consider the needs for strategic logistics.

The subsequent 'West Midlands Strategic Employment Sites Study 2023/24' published August 2024, provides advice on site criteria, and although this is in relation to strategic sites, it identifies the A45 corridor (Area 7) as having high demand and resulting take-up, and 'rents achieved are some of the highest in the Midlands market'. Further, it explains that 'Coventry has relatively high levels of unemployment', which only further highlights the importance of delivering adequate employment land supply.

An up to date, proactive and forward-looking evidence base is essential to inform the new local plan. Retrospective, or backward-looking past trend-based evidence will only serve to perpetuate historic missed opportunities to fully plan for the needs of the City's economy. While the HEDNA has considered a number of scenarios and sources of evidence of need and demand, it is important to note that the analysis undertaken is essentially trend based. Given the historic under-supply of large-scale sites across the wider region and a relative lack of allocations of such sites through past Local Plans in the West Midlands (and elsewhere), any trend-based projection of need and demand will inevitably be an under-estimation.

In addition to the above, supply needs to be considered to meet the replacement supply demand of existing businesses within Coventry who seek new premises better suited to their evolving requirements, and to allow modern modes of operation. This need is recognised in the evidence base, and the availability of sufficient land is critical if this natural 'churn' in the market is able to take place. New replacement employment premises – redeveloped existing sites or refurbished buildings – can make a notable contribution to improving the quality of existing supply by delivering modern units with, for example, greater energy efficiency or renewable energy opportunities which helps meet the ESG or sustainability aims of many occupiers which are not currently or easily met in older, existing employment buildings.

Evidence which forms part of these representations highlights that the overall need for employment land in Coventry City is greater than that assumed by the CCC evidence base. Therefore, in reality the shortfall between requirement and proposed new land supply is also more significant than the 45ha, in both quantitative and qualitative terms, than that identified by the CCCLP and its supporting evidence base.

Savills have prepared a report (Industrial and Logistics (I&L) Needs Assessment February 2025) which reviews and assesses the robustness of the employment evidence base. It draws conclusions on employment land requirements based on Savills' own assessment of needs that considers historic under delivery of sites, as well as forecasted future growth. Please find the report enclosed.

The Savills report critiques the evidence base for employment land needs in support of the Local Plan comprising the 2022 HEDNA, 2024 WMSESSS, and West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024). It assesses that the identified employment land requirements are formed by an analysis of trend-based data, which does not consider market indicators.

Recent market trends indicate through the high absorption rates, low stock availability, and increased rental values that the market has historically (and currently) been

constrained by supply, therefore resulting in inhibited take-up. The trend-based assessment in the Council's evidence base, therefore, does not consider these market conditions and in turn underestimates the actual employment land need requirements. This does not accord with NPPF Paragraph 32 (Dec 2023) which specifically requires policies to "take into account relevant market signals".

The Savills report uses their own assessment methodology which considers market signals in accordance with NPPF paragraph 32, which is becoming a well-recognised method of accurately identifying employment land requirements. In summary, this assessment concludes that the employment land requirements across the FEMA are underestimated, as is Coventry's share of the non-strategic employment need across the FEMA. Accepting the Council's identified supply of non-strategic sites at 67ha (some sites of which are identified to be constrained by Savills), Savills conclude that the unmet need is 72 - 86ha, which is significantly greater than the 45ha recognised within the CCCLP.

Whilst the CCCLP acknowledges the unmet need in relation to non-strategic employment need, it goes little way to discussing the requirements of employment land for strategic sites of 25ha or more, or 9,000sqm+, a requirement set out in the WMSESS 2024.

The WMSESS 2024 draws conclusions based on areas of opportunity, and 'Area 7' falls within the administrative boundaries of Rugby Borough and Coventry City. Responsibility therefore falls on these authorities to allocate sites to meet this identified unmet need of 9 – 84ha as set out in the 2024 Alignment Paper. Work done by Savills for HL challenges this need figure, suggesting the need for strategic sites is higher.

The unmet need for strategic sites is in addition to the strategic site allocation set out in the CCCLP JE2:4 for 25ha, which is already identified in the WMSESS 2024 as a pipeline supply site and therefore does not meet that shortfall set out above.

There is no clear evidence published between CCC and Rugby Borough that sets out how this unmet (strategic or non-strategic) need will be delivered between the authorities, and CCC should therefore make information publicly available as to how the Duty to Cooperate Partners are working together to meet this need.

In general, the recognised unmet employment land need for non-strategic sites and failure of CCC to fully assess and set out the approach to meeting strategic employment land requirements, demonstrates a negative approach to employment development. This in turn undermines CCC's approach to the local economy, and contradicts the approach set out in 'The Vision' section of building a strong, responsive, and competitive economy.

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 JE2 should be revised to allocate sufficient and appropriate land to meet the employment land requirements identified in the local plan evidence base (which we do not entirely accept). Alternatively, a statement of common ground or memorandum of understanding should be agreed by Duty to cooperate partners (or made publicly available if one has been prepared) in order to secure delivery of the employment land needs.

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)

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

N/A

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)?

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No, I do not wish to participate in hearing session(s)

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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.