



Land at Walsgrave

Response to Coventry Local Plan Review Regulation 19 (Proposed Submission) Consultation

February 2025

On behalf of

SEGRO

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1 INTRODUCTION

- 1.1 Stantec are instructed by SEGRO to submit these representations to the Coventry Local Plan Review Regulation 19 Proposed Submission consultation in respect of their land interests at Walsgrave.
- 1.2 The Walsgrave site is allocated for housing at Policy H2:3 in the adopted Coventry Local Plan (2011 – 2031). This Policy provides for 900 dwellings as well as the incorporation of blue light access linking the A46 to the University Hospital and to facilitate work with National Highways on highways proposals linked to a new grade separated junction on the A46 at Walsgrave (Clifford Bridge).
- 1.3 SEGRO remain committed to the delivery of this residential allocation, working with Coventry City Council together with National Highways in the context of their proposed improvements to the A46 at Walsgrave.
- 1.4 The site at Walsgrave is shown outlined in red on the Site Location Plan at **Appendix A** (the residential site). The site is located to the west of the A46, adjacent to the existing urban area of Coventry City, comprising housing, employment and the University Hospital Coventry & Warwickshire.
- 1.5 SEGRO also control land to the east of the A46, in the administrative area of Rugby Borough as shown at **Appendix B** (the employment site). SEGRO consider this land is a suitable site to deliver strategic employment floorspace adjacent to the successful Ansty Park development and the strategic road network (SRN).
- 1.6 The need to deliver housing is identified in the Coventry Local Plan Review Regulation 19 Proposed Submission (hereafter referred to as ‘the Proposed Submission Plan’). The Proposed Submission Plan also recognises the need for the logistics market to be considered at a strategic scale. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (2022) identifies these needs and where these could be met, which includes the A46 corridor.
- 1.7 The following representations comment on the relevant policies of the Proposed Submission Plan as well as the evidence base. The evidence base documents we have commented on are as follows:
 - Growth Needs Background Paper (November 2024)
 - Employment Land Review (August 2024)
 - Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (September 2024)
 - Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (November 2022)

- Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) SA Report (October 2024)
- Local Plan Review Duty to Co-operate Statement Regulation 19: Proposed Submission stage

1.8 These representations have the underlying aim of ensuring that the Plan and its' policies accord with the legal and procedural requirements and are sound in accordance with NPPF Paragraph 35.

1.9 SEGRO welcome the ongoing engagement with Coventry City Council Planning Policy Officers in regard to the delivery of this allocated site and will continue to discuss bringing forward this site with an outline planning application.

1.10 SEGRO would propose to prepare and agree a Statement of Common Ground (SoCG) with Coventry City Council, which deals with the delivery of the site for residential purposes consistent with the allocation.

2 NATIONAL PLANNING POLICY FRAMEWORK (2023)

2.1 The Proposed Submission Plan is being progressed under the policies of the 2023 version of the National Planning Policy Framework, as per the transitional arrangements in the December 2024 NPPF. Therefore, these representations are made with reference to the policies of the 2023 NPPF.

2.2 Paragraph 35 of the NPPF sets out the tests which Local Plans are assessed against at examination.

2.3 Plans are 'sound' if they are:

(a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

(b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

(c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

(d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

2.4 Paragraph 11 makes it clear that plans and decisions should apply a presumption in favour of sustainable development and for plan making this means that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

2.5 Paragraph 24 confirms the duty of local planning authorities to cooperate with each other on strategic matters that cross administrative boundaries. Paragraph 26 indicates that joint working should help to determine whether development needs that cannot be met wholly with a particular plan area could be met elsewhere.

2.6 Paragraph 87 sets out the importance of planning policies to recognise and address the specific locational requirements of different sectors. This includes making provision for “storage and distribution operations at a variety of scales and in suitably accessible locations”.

2.7 Section 11 is clear that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Achieving appropriate densities is also a key feature of this section of the NPPF, where paragraph 128 states:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed and beautiful, attractive and healthy places.”*

2.8 Paragraph 145 clarifies that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.

2.9 Paragraph 146 explains that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*

2.10 Planning Practice Guidance (PPG) provides further advice on Plan making and how these tests can be met.

3 POLICY H2: HOUSING ALLOCATIONS

- 3.1 SEGRO support the allocation of the Walsgrave Hill Farm site (H2:3) and remain committed to the delivery of this housing allocation, working with Coventry City Council and National Highways in the context of their proposed improvements to the A46 at Walsgrave as well as other stakeholders and consultees.
- 3.2 The site is suitable and deliverable for housing in the Plan period. This land will be subject to a planning application and development commenced in the Plan period.
- 3.3 We note Policy H2:3 is tied to the delivery of the new A46 Walsgrave junction, as an essential piece of infrastructure to serve the site. The Development Consent Order (DCO) application for the A46 Coventry Junctions (Walsgrave) was submitted to the Planning Inspectorate on 14th November 2024. The notification of decision to accept the application for Examination for an Order Granting Development Consent was issued by the Planning Inspectorate on 12th December 2024, and the examination is expected to start in May 2025.
- 3.4 The DCO application is projected to be determined around Spring 2026 and subject to this being approved National Highways would expect to commence these works in Autumn/ Winter 2026. SEGRO would propose to submit an outline planning application for residential purposes at this time and to enable a start on site at the point the Walsgrave junction is opened towards the end of 2027.
- 3.5 SEGRO confirm the delivery of the residential site can come forward ahead of the proposed employment site to the east of the A46, in Rugby Borough.
- 3.6 SEGRO consider that the following wording of Policy H2:3 is not 'consistent with national policy' and it cannot therefore be considered sound in accordance with paragraph 35 of the NPPF as it does not meet the relevant policy test in the NPPF regarding designated heritage assets:

"Retention and enhanced setting of listed buildings at Hungerley Hall Farm."

4 POLICY H9: RESIDENTIAL DENSITY

- 4.1 SEGRO support Policy H9 for residential development to make the most effective and efficient use of land as this reflects the objective of Section 11 of the NPPF for planning policies and decisions to promote an effective use of land in meeting the need for homes whilst also achieving appropriate densities. However, SEGRO consider that if this aspiration is to be achieved then the Policy should be amended to reflect that the densities in Part 3 of the Policy should be a minimum and the permissible densities of each development site should be determined on a site-by-site basis.
- 4.2 The consequence of this change would mean that the Policy would not set a limitation on sites from delivering higher densities were it is appropriate and suitable to do so, and those sites would be able to provide a greater contribution towards meeting the Council's housing land requirements. In view Policy H9 can then be considered to be 'consistent with national policy' and in accordance with NPPF paragraph 35.
- 4.3 We consider the Site is deliverable housing allocation. We are aware that the Flood Maps for Planning (the Flood Zones) are expected to be updated in March 2025 (they have not been made publicly available at this time) and once available a further assessment of the site to inform the development will be carried out.
- 4.4 SEGRO intend to enter in to a Statement of Common Ground with Coventry City Council in relation to the availability and deliverability of this Site, ahead of a future Local Plan Examination.

5 POLICY DS1: OVERALL DEVELOPMENT NEEDS

5.1 For clarity, this section considers Coventry City's local employment needs. The need position in Coventry for 'strategic B8' uses is addressed in Section 5.

5.2 Policy DS1 sets out the overall development needs for Coventry over the Plan period (2021 – 2041). It is SEGRO's view that the Policy does not set an employment land need figure based on the appropriate evidence or appropriately plan for enough employment land to meet its needs or detail the agreement from neighbouring authorities to meet the unmet need. Consequently, the Proposed Submission Plan is unlikely to meet the test of 'soundness' as it is not 'positively prepared', 'justified' or 'effective' in accordance with NPPF paragraph 35.

5.3 The supporting text to Policy DS1 indicates the starting point for quantifying Coventry's overall amount of employment need over the Plan period is the HEDNA. The HEDNA sets out the employment land needs for Coventry is 8.5 hectares for office space and 147.6 hectares for general industrial uses (excluding strategic B8) which provides a total of 156.1 hectares for the period 2021 – 2041.

5.4 The Employment Land Review (ELR) provides policy recommendations which include updating local policies to reflect current market conditions and the latest quantitative and qualitative employment needs identified in the HEDNA. The ELR therefore follows the recommendation in the HEDNA stating that

"For Coventry, more specifically, the employment land need specified for the period 2021- 2041 is 156.1 hectares, comprising 8.5 hectares for offices and 147.6 hectares for general industrial use".

5.5 The ELR goes on to set out that as of 31st March 2023, the committed employment land supply in Coventry was calculated to be 69.3 hectares. This leaves a remaining need from 2023 to 2041 of 71.3 hectares, consisting of a substantial requirement for 73.9 hectares of industrial floorspace and an indicative oversupply of 2.7 hectares of office floorspace.

5.6 Elsewhere the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper sets out that reflecting the Plan period of 2021-2041, the paper identifies an overall need of 105 hectares, with a supply of 60 hectares, leaving a residual need of 45 hectares.

5.7 Policy DS1 sets out the overall development needs for Coventry over the Plan period (2021 – 2041) and it refers to the 60 hectares of employment land to meet local needs within the City's administrative boundary but then goes onto to say Coventry's employment need for the period 2021 to 2041 is for 105 hectares of employment land. The following clarification is provided in regard to this 105 hectares figure:

“...It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work proactively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Functional Economic Market Area.

4. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data within 5 years of the date of adoption of the plan to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.

Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -

- a. Through the Duty to Co-operate, the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;*
- b. Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;*
- c. The monitoring of the Local Plan (in line with the Plan’s Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan’s objectives and requirements;*
- d. Any other reasons that render the Plan, or part of it, significantly out of date.”*

5.8 It is considered Policy DS1 is not ‘effective’, as effective joint working on cross-boundary strategic matters has not progressed and the Plan defers meeting this identified need to subsequent development plans.

5.9 The Growth Needs Background Paper confirms the growth requirement figure for Policy DS1 in terms of Local Employment Need is considered to be 60 hectares which “reflects the evidence base”, leaving a shortfall of 45 hectares. The paper goes on to explain the justification for deviating from the larger HEDNA figure of 147.6 hectares as follows:

“At the Regulation 18 stage no ‘reasonable alternatives’ had been proposed as the only identified quantum of land needed for employment need was that defined by the HEDNA (2022). As set out above however a significant amount of additional evidence and assessment work was undertaken to review the need and assess the supply and any locational factors involved. Therefore three reasonable alternatives were investigated to inform the Regulation 19 work.

For the quantum of growth, the HEDNA figure of 147.6 hectares was tested as this was the confirmed quantum at the time. The figure of 60 hectares was tested as this was an assessed supply figure using up to date evidence (without requiring Green Belt release). A further alternative was tested, which was the 60 hectares supply figure plus an additional 11.81 hectares which reflected a site in the Green Belt which had been put forward through the Call for Sites.

As set out in the housing section earlier in this paper, the alternative option for accommodating any growth needs in the Green Belt was dismissed. The figure of 60 hectares was selected as the Preferred Option as, taking into account all evidence (including the various Call for Sites exercises) this was a realistic figure which the Council felt that could be accommodated for local employment need.”

- 5.10 The decision to select the 60 hectares figure as the Preferred Option contradicts the supporting text of Policy DS1 which states that the starting point for quantifying Coventry's overall amount of employment need over the Plan period is the HEDNA.
- 5.11 The explanation provided in the Growth Needs Background Paper seems to suggest that the lower 60 hectares option was selected as a result of the outcome of the Council's Call for Sites exercises undertaken. The result of these exercises determined that the 60 hectares is a realistic figure of employment need:

“The figure of 60 hectares was selected as the Preferred Option as, taking into account all evidence (including the various Call for Sites exercises) this was a realistic figure which the Council felt that could be accommodated for local employment need”.

- 5.12 This position seems to conflate employment land need and supply, as it suggests the employment land need figure has been derived from the outcome of the Call for Sites exercises which purpose is to identify new sites to contribute towards employment supply, or in other words, the outcome of the employment land supply exercise has determined which employment land need option has been selected as the preferred option. This is not how employment land supply should be determined, the NPPF is clear that Local Plans should seek to meet the area's objectively assessed needs. This is opposed to determining need based on the available supply in that authority and if identified need cannot be met in that authority it should be met within neighbouring authorities. For these reasons, it cannot be considered that the Policy is 'positively prepared', as it does not seek to meet the area's objectively assessed needs or is informed by agreements with other authorities to meet the unmet need.
- 5.13 This view is repeated in the Sustainability Appraisal. The reasons for the rejection of the 147.6 hectares figure option is described in Table 4.7b and is as follows:

▪ Rejected as this level of growth cannot be accommodated within Coventry's constrained boundaries

5.14 SEGRO request that in order for the Proposed Submission Plan to be 'justified' and 'positively prepared' the Council should provide a strategy in the Local Plan Review to meet the area's objectively assessed needs. SEGRO suggest that this strategy should provide an appropriate employment need figure which is based on proportionate evidence and should therefore reconsider the HEDNA figure of 147.6 hectares.

6 POLICY JE1: OVERALL ECONOMY AND EMPLOYMENT STRATEGY

- 6.1 This section relates specifically to the need position in Coventry for 'strategic B8' uses. The need position for Coventry's local employment needs has been addressed in the preceding section.
- 6.2 SEGRO as a leading owner, manager and developer of modern warehouses and industrial property, with premises across the Midlands are very close to the market. SEGRO agree that the logistics sector operates at the strategic scale and therefore that the need for this particular type of floorspace should be calculated separately from the other employment uses and suggest there is a need for this use type of need to be safeguarded through specific and separate allocations.
- 6.3 SEGRO recognise that the Proposed Submission Plan, and its evidence base, acknowledges that 'strategic B8' land needs should be calculated separately from local employment need as 'strategic B8' can only be considered at the regional scale. However, SEGRO are concerned that no sites have been allocated in Coventry City's authoritative boundary or identified outside of its administrative boundary to meet this 'strategic B8' need and therefore are of the view that the Proposed Submission Plan will not meet the test of 'soundness' as it is not 'positively prepared' or 'effective' in accordance with paragraph 35 of the NPPF as it has not demonstrated that the Policy JE1 has identified a sufficient supply of sites to meet the area's objectively assessed needs.
- 6.4 The HEDNA provided a calculation for 'strategic B8' which is the growth of the logistics sector, and which related to warehousing units over 9,000sq.m (100,000 sq.ft). Because of the scale and nature of this kind of development it needed to be considered at a strategic scale therefore the need across the whole of the Coventry and Warwickshire sub-region was projected to be 551 hectares to 2041.
- 6.5 Through the previous reps, Stantec noted that the Issues and Options consultation document does not provide any further context or direction as to how the HEDNA identified figure of 551 hectares will be distributed amongst the authorities that make up the sub-region or how much Coventry City are expected to contribute towards this need.

- 6.6 Since the Issues and Options consultation, the West Midlands Strategic Employment Sites Study (WMSESS) was published in September 2024. The focus of the study is strategic units for manufacturing and logistics, defined as being those of a size over 100,000 sq.ft. (9,300 sq.m.), and strategic sites typically 25 hectares and over. The study aimed to provide an updated position on committed sites, identify the need for large scale strategic logistics and manufacturing, seek to address the requirements of modern industry, provide recommendations on the number and type of strategic sites required and advise on phasing and priority.
- 6.7 The WMSESS quantifies the amount of strategic need across the wider West Midlands Study Area. It identifies areas of opportunity, based on a number of factors including locational requirements, for where this could be accommodated. Coventry falls within 'Area 7', focusing on Coventry, Rugby, Nuneaton and Warwick in particular around the M6, A45, A46 and M45.
- 6.8 The Coventry & Warwickshire HEDNA – WMSESS Alignment Paper was published in September 2024. The alignment paper was produced to consider the relationship between employment land need recommendations in the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 and the Coventry and Warwickshire Housing and Economic Development Needs Assessment (C&W HEDNA) 2022
- 6.9 In the alignment paper, Strategic Sites need is considered between 2022 and 2045 to align with the WMSESS and to allow for the differing timelines of local plan production across the Coventry and Warwickshire sub region. For Area 7, a range of between 9 – 84 hectares residual strategic sites need is identified. The report does not clarify how much of this range of residual strategic sites need to be met by Coventry City specifically. The Background Paper Growth Needs clarifies that "*Strategic Employment Need is being discussed with partners in relation to the wider Opportunity Area 7 relating to Rugby, Warwick and Nuneaton & Bedworth and so cannot be disaggregated into a meaningful requirement specifically for Coventry.*".
- 6.10 The Council's Growth Needs Background Paper summarises the position in relation to the supply of sites capable of contributing towards the residual strategic sites need concluding that "*Coventry has no sites of this scale being promoted and is working with its partners on Opportunity Area 7 to address the matter*". Therefore, Policy JE1 cannot be considered to be, in accordance with paragraph 35 of the NPPF, 'positively prepared' as it does not seek to meet the area's objectively assessed needs and neither is it informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated achieving sustainable development or 'effective' as it is not based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred as it defers the identification of sites capable of meeting a strategic need to a later date.

6.11 SEGRO consider that it is important Coventry City correctly identifies its employment need, including that of 'strategic B8' land, to provide a base to work from and for any unmet need to be met by Coventry's neighbours; closest to where the need arises. This would include Rugby Borough.

6.12 One of the recommendations to Coventry City in the ELR is as follows:

"Collaborating with neighbouring authorities to meet regional employment needs, particularly for strategic B8 uses, to manage land availability constraints and foster effective joint working."

6.13 The NPPF seeks to promote sustainable development. This includes locating new development close to employment opportunities, shops and services and public transport routes. As such, any unmet need arising from Coventry City should be delivered adjacent to Coventry's boundary.

6.14 The Local Plan Review Duty to Co-operate Statement Regulation 19: Proposed Submission stage specifically refers to discussing accommodating the residual strategic site need identified for the 'Area 7: M6 / A45 / A46 / M45 Coventry & Rugby' with Rugby Borough through Rugby's own Local Plan Review:

"Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions will be required as Rugby progresses its local plan."

6.15 The employment site in Rugby Borough located at land to the east of the A46 provides a suitable opportunity and sustainable location to deliver Coventry's unmet 'strategic B8' need; being adjacent to Coventry City. It will also deliver employment generating development adjacent to planned residential growth thus limiting the need to travel large distances to reach employment opportunities. The site will also capitalise on the planned infrastructure improvements with the delivery of the new A46 Walsgrave junction¹ which will replace the existing roundabout junction with the B4082. Therefore, meeting the objectives of sustainable development in paragraph 11a of the NPPF which says that for plan making plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure.

6.16 The site is also well connected to the wider strategic road network with the M6 being easily accessible from Junction 2. In addition, the site is an advantageous location for the delivery of employment floorspace being located situated along the 'A46 Corridor' as identified in the HEDNA, which is described as one of the two 'corridors' that can play a greater potential role in providing strategic B8 development than they historically have. The site is also situated in the proximity of Junction 2 of the M6, and the 'M6 Corridor' is identified in the HEDNA as a 'key potential' corridor within the sub-region to accommodate strategic B8 development.

- 6.17 The proposed employment development at the employment site would provide significant employment floorspace to meet the employment needs across various sectors ranging from large scale manufacturing and warehousing occupiers to starter units and workshops. The delivery in the region of 370,000 sqm (4,000,000 sqft) of high-quality employment floorspace will provide associated benefits and potential linkages to existing and new employers and educational providers along with a targeted package of skills training and employment opportunities for existing and future residents.
- 6.18 Included at **Appendix C** is the Vision Document that has been prepared for the employment site at Walsgrave which details the broad specifications of how the site will come forward to deliver a well-designed employment scheme which has been designed using a landscape led approach and benefits from the excellent connections to the strategic road network.
- 6.19 Development of the employment site will also safeguard a route through for the proposed Very Light Rail, to enable the aspiration for this infrastructure to be realised in the future. This would help to achieve the objective of Policy AC1: Accessible Transport Network to support the provision and integration of emerging and future intelligent mobility infrastructure, including Very Light Rail.
- 6.20 SEGRO would welcome further clarity in relation to the sites outside of Coventry's administrative boundary that are identified to meet the identified need for 'strategic B8' floorspace in Coventry and the wider sub-region.

¹ The Development Consent Order application for the A46 Coventry Junctions (Walsgrave) has been submitted and at the time of writing it is at the pre-examination stage.

7 POLICY DS2: THE DUTY TO CO-OPERATE AND PARTNERSHIP WORKING

7.1 Policy DS2 confirms that Coventry City Council will work with neighbouring authorities in its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the City. Policy DS2 specifically refers to supporting the growth and expansion of a number of sites near to the boundary of Coventry City including Ansty Park, which is adjacent to SEGRO's proposed Walsgrave employment site shown at **Appendix B**.

7.2 Policy DS2 reflects the Council's commitment to co-operate with partners on a range of matters including housing, infrastructure, economy and jobs, transport, health and the environment. SEGRO welcomes this objective in the Policy.

7.1 SEGRO also welcome the Council's commitment to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development sites that cross and are adjacent to administrative boundaries.

7.2 The previous Local Plan Inspector's Report into the now adopted Coventry City Council Local Plan, referred to the demand for new employment land around Coventry and Warwickshire (paragraph 178). The Inspector referred to the City Council's support for its 'Warwickshire neighbours' intention to allocate additional sites adjacent to the boundary of Coventry City within the wider Green Belt.

7.3 SEGRO welcomes the overarching objective of Policy DS2 to commit to co-operate with partners on a range of matters including economic growth, infrastructure and others. We note many of the sites identified in part 6 of Policy DS2, such as Ansty Park, which are intended to meet Coventry's unmet need, in neighbouring authorities are now substantially built out. Therefore, new sites will need to be identified to meet the unmet need arising from Coventry City and over the new Plan period.

7.4 It is clear that the previous Local Plan Inspector's view referred to (above) and the objective of Policy DS2 to support the delivery of sites in neighbouring authorities to meet Coventry's unmet need, provides a context for the delivery of future sites, adjacent and well placed to meet Coventry City's unmet need.

7.5 The proposed employment site at Walsgrave provides the opportunity to make a significant contribution to unmet employment need, including 'strategic B8', arising from Coventry City. The Site is in a location adjacent to Coventry's boundary, well placed to support the economy of Coventry City, with excellent links to the strategic road network; which itself is proposed to be improved by National Highways.

- 7.6 SEGRO recognise that Coventry City are in discussions with its neighbours to deliver the unmet local and strategic B8 employment need and therefore Policy DS2 should be positively written to express that the Council are undertaking the work with their neighbours to identify suitable sites to meet this unmet need.
- 7.7 For Policy DS2 to be considered to 'positively prepared' and 'consistent with national policy' in accordance with paragraph 35 of the NPPF, the Policy should specify that the Council's preference is to identify sites to meet the unmet need by Coventry's neighbours in locations closest to where the need arises. This would contribute towards meeting the objectives in the NPPF of achieving sustainable development by placing and ensuring sufficient land of the right type is available in the right places and placing employment growth adjacent to new planned homes.

8 POLICY AC1 ACCESSIBLE TRANSPORT NETWORK

8.1 SEGRO agree with the Council's view that emerging modes of transport such as Very Light Rail should be referenced in Policy AC1 (5). In support of this, SEGRO would safeguarding land for provision of Very Light Rail so that the aspiration for this infrastructure can be realised in the future.

9 SUMMARY

- 9.1 We submit these representations on behalf of SEGRO in response to Coventry City Council's Regulation 19 Proposed Submission consultation in respect of their land interests at Walsgrave.
- 9.2 SEGRO remain committed to the delivery of the H2:3 housing site and are monitoring the determination of the A46 Walsgrave Junction DCO application, as the intention is to submit an outline application for the site to tie into these works. We continue to discuss and engage with Coventry City Council, and will enter into a Statement of Common Ground to support the delivery of this Site.
- 9.3 At present the Proposed Submission Plan does not seek to allocate sites to meet the identified need for local and 'strategic B8' identified in the HEDNA within 'Area 7' which includes Coventry and Rugby Borough. Neither does the Plan allocate a sufficient number of sites to meet Coventry's local employment needs as a shortfall is acknowledged. The Council are relying on discussions with their partners, including Rugby Borough, to identify sites outside of their authority boundary to meet this unmet need. This position is summarised in the ELR:

"The constrained nature of Coventry City Council area means it may not be possible to meet all of these needs [the residual employment need for Coventry City] within the local authority area, and as such it may be necessary for the Council to engage with neighbouring authorities through the Duty to Cooperate to see whether any unmet needs could potentially be met elsewhere. This will be necessary alongside discussions on how to meet the separately identified strategic B8 needs to serve the wider Coventry and Warwickshire functional economic market area."

- 9.4 For the reasons set out in these representations, SEGRO consider that Policy DS1 and Policy JE1 are not 'positively prepared', 'justified' or 'effective'. SEGRO also consider that Policy H2:3 is not 'consistent with national policy'. Consequently, the Proposed Submission Plan does not meet the test of 'soundness' in accordance with NPPF paragraph 35.
- 9.5 SEGRO also consider that Policy H2:3 is not consistent with national policy in accordance with NPPF paragraph 35.
- 9.6 SEGRO would welcome the opportunity to participate in the future Examination hearing sessions for the Local Plan.

- 9.7 SEGRO recognise the contribution the Walsgrave employment site (in Rugby Borough) can make towards meeting Coventry's unmet employment needs. It is in a suitable location and scale to meet identified strategic B8 needs, adjacent to Coventry City's boundary.

Appendix A Residential Allocation Location Plan

Appendix B Proposed Employment Location Plan

Appendix C Land at Walsgrave Hill – Vision Document (employment site)

