

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/planningpolicyprivacynote

Please also note that 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	Miss	
First Name	Stacey	
Last Name	Green	
Job Title	Planning Manager	
(where relevant)		
Organisation	Stoford Developments	
(where relevant)		
Address Line 1	26-28 Ludgate Hill	
Line 2	Birmingham	
Line 3		
Line 4		
Post Code	B3 1DX	
Telephone Number		
E-mail Address	[REDACTED]	

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:

	Yes <input checked="checked" type="checkbox"/>	No <input type="text"/>
(1) Legally compliant	Yes <input type="text"/>	No <input type="checkbox"/>
(2) Sound	Yes <input type="text"/>	No <input checked="checked" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input checked="checked" 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.

- | | |
|-----|--|
| 1.1 | The policy does not include any reference to how the City Council will work with the neighbouring authorities within its Functional Economic Market Area to support the delivery of the employment needs identified in Policy DS1 – both local and strategic. NPPF para 24-27 is clear on the Duty to Co-operate and for LPAs to address matters in their plans, and the need for such plans to align. This is a significant omission which must be corrected. Reference is made only to how the 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. |
| 1.2 | As set out in the Growth Needs Background Paper (page 18), Coventry cannot meet its local employment needs in full and the strategic employment needs identified for Opportunity Area 7 within the WMSESS. Thus, this is currently under discussion with partners under the Duty to Co-operate to explore where this could best be accommodated. Given that Rugby Borough is at an early stage of plan making it should be able to respond to the requests of Coventry. This may be through the allocation of sites on the edge of Coventry (within Rugby Borough) to meet Coventry's local needs (given the proximity to local residents in Coventry) and these may be between 20 ha and 45ha in total. Also, additional sites will be required within Rugby Borough to provide for meeting strategic needs (which we consider exceed 84ha) across Opportunity Area 7. If Coventry cannot accommodate them, the most sustainable locations within Rugby Borough should be considered next |

given these serve the entire Opportunity Area 7 whereby proximity to Coventry's boundary is less relevant. Sustainable locations, with strong linkages, on brownfield, greenfield, Grey Belt and only where exceptional circumstances exist, should those strategic sites be within the Green Belt of Opportunity Area 7. This Duty to Co-operate policy should be clear about how this will happen in terms of how much 'need' will be met by Rugby and where. A MOU should also be prepared and agreed comprising a statement of intent.

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.

- 1 The policy should be amended to reference how the City Council will work with the neighbouring authorities within its Functional Economic Market Area to support the delivery of the employment needs identified in Policy DS1 – both local and strategic.
- 2 The Duty to Co-operate policy should be clear about how Rugby Borough Council will assist the City Council in meeting its unmet needs. The policy should refer to how much of the need will be met by Rugby and where. A MOU should also be prepared and agreed comprising a statement of intent.

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

(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:

We are a developer with land interests in Coventry and Warwickshire and have concerns how the evidence base is being interpreted and applied.

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.