

This 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 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).

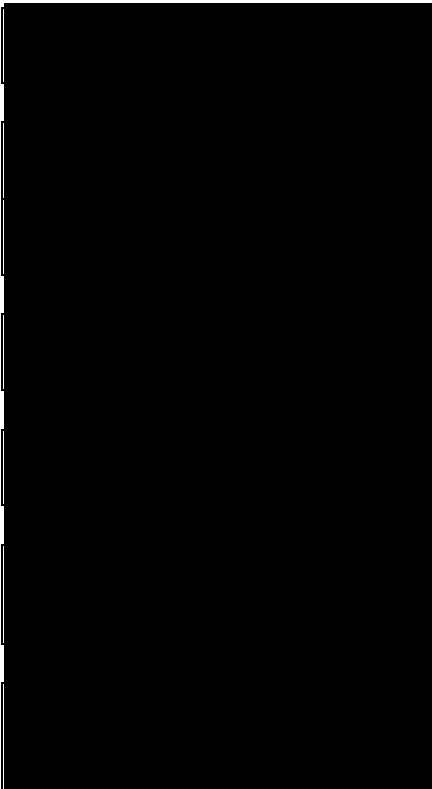
Please fill in a separate sheet for each representation you wish to make.

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="Dr"/>	<input type="text"/>
First Name	<input type="text" value="Thomas"/>	<input type="text"/>
Last Name	<input type="text" value="Willans"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
(where relevant)		
Organisation	<input type="text"/>	<input type="text"/>
(where relevant)		
Address Line 1		<input type="text"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>
Line 4		<input type="text"/>
Post Code		<input type="text"/>
Telephone Number		<input type="text"/>
E-mail Address		<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: Thomas Willans

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" value="X"/>	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" value="X"/>	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.

While Policy DS2 highlights Coventry City Council's commitments under the Duty to Cooperate, there is insufficient evidence of clear agreements with neighbouring authorities to meet unmet housing and employment needs. For instance, Coventry's identified shortfall of 45 hectares of employment land (Policy DS1) is not fully addressed through confirmed cross-boundary allocations. Much of this uncertainty is associated with the South Warwickshire Local Plan being at the regulation 18 consultancy ending on March the 7th. Much of this uncertainty related to the South Warwickshire local plan, including greenbelt issues, housing allocation issues, employment issues will shortly be reduced. The South Warwickshire local plan, for instance, has not yet included the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 having implications for Coventry's employment needs.

This introduces serious uncertainty and risks to the plan's soundness which can be soon reduced.

Furthermore, the policy lacks specific mechanisms or actions to ensure that Coventry citizens can reliably access affordable housing opportunities within Warwickshire, as referenced in DS2(2).

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

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.

- As the South Warwickshire Local Plan will have completed the regulation 18 consultancy on 7 March 2025, just 4 days after this consultation closes enabling much of this uncertainty can be reduced soon by incorporating the outcome of the South Warwickshire local plan and their inclusion of the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 prior to adoption of the Coventry Plan. This would greatly enhance the soundness of the whole plan rather than wait for complications of making piecemeal reviews and alterations at later stages, after adoption, such as that suggested in the policy DS1(4). DS1(4) will still be needed for use at later time.
- Provide detailed documentation of collaborative agreements with neighbouring authorities under the Duty to Cooperate, particularly regarding employment and affordable housing needs.
- Include specific measures to ensure that cross-boundary housing provision is accessible to Coventry citizens.

(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.

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

6.5,6.8,6.11-6.12

Please add any further comments relating to the SA report in the box below

By the nature of the duty to cooperate the ramifications may include most policies addressed by the sustainability appraisal.

(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)?

X

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:

(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.

Part B – Please use a separate sheet for each representation

Name or Organisation: Thomas Willans

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

Paragraph Policy

11. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

12. 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.

Coventry's reliance on neighbouring authorities, including South Warwickshire, to address housing needs is compounded by unresolved settlement and Green Belt issues. For example, errors in settlement assessment in the SWLP (e.g., Hatton B1 and proximity to infrastructure like Hatton Station, misidentification of green belt parcels e.g. B1 South of Hatton Park when area B1 is north) may undermine the ability to deliver sustainable and coordinated development.

The safeguarding of Green Belt land along Coventry's southern boundary also risks creating indefensible Green Belt boundaries or misaligned growth patterns if settlement issues in South Warwickshire are not resolved

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

13. 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.

- Reassess the safeguarded Green Belt land to ensure defensible boundaries in light of unresolved SWLP settlement issues.
- Strengthen collaboration with South Warwickshire to address settlement and housing allocation issues that impact Coventry's unmet needs. These issues should be addressed before adoption of the plan.
- This strengthened collaboration should include evaluating the outcome of the Regulation 18 South Warwickshire Local Plan consultation.

(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.

14. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

6.5,6.22-6.23

Please add any further comments relating to the SA report in the box below

By its nature policy on green belt has implications for most areas of strategic planning policy but I am especially aware of the impact upon housing needs, employment needs, the environment and urban sprawl.

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

15. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X

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.

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

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

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