

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

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

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:

(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.

Policy JE6 gives support for tourism and visitor related development proposals which would contribute towards the city's role as a tourism destination.

The corresponding policy in the adopted Local Plan (Policy JE5) makes specific reference to the University of Warwick as a location where tourism/visitor related uses will be supported. However, this reference has not been taken forward into the revised policy in the Regulation 19 Plan.

Paragraph 5.35 of the Regulation 19 Plan states that "*Tourism/visitor related development such as hotels, conference facilities and leisure/recreation schemes which are classified by the NPPF as Main Town Centre Uses will also need to satisfy the Sequential and, where appropriate, Impact Tests laid down in national guidance.*" This text is not included within the policy itself.

Whilst it is acknowledged the NPPF does set out what are considered to be main town centre uses and requires a sequential test to be undertaken for those uses when not proposed within town centres, given that the University is not in the town centre but is home to the Warwick Arts Centre which is a significant existing visitor/tourist attraction within Coventry, and also home to established conference facilities it is considered that any future extensions to the Arts Centre and/or the

conference facilities should not be required to be sequentially assessed. Such proposals would be to serve the University/Arts Centre and therefore would not be appropriate on any site other than within the campus.

The loss of a specific reference to the University campus from Policy JE6 is also questioned by the University. Given that reference is made in Policy JE1, it is submitted that this should be carried forward into Policy JE6. There does not appear to be a clear reason why this specific reference has been removed.

The University therefore, considers that Policy JE6 has not been positively prepared and is not sound.

(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.

It is recommended that reference to the University of Warwick campus as a location where tourism and visitor related development is supported be made in policy JE6, in order to provide consistency with Policy JE1 and recognise the important role the University plays in this sector and the existing facilities which are within the campus.

Amendments should also be made to paragraph 5.35 to reflect that the University of Warwick campus is an established destination in its own right due to the existing tourism/visitor and conference facilities contained within it. By its nature it is therefore different to other locations outside of main town centres where such facilities may be proposed. Tourism/visitor related proposals and proposals related to conferences facilities within the defined campus of the University (as defined by the SPD) should therefore not be subject to the sequential tests.

(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

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:

The University consider it is important to be represented at the Hearing Sessions so that the Inspector understands the role it plays in the tourism/visitor economy within Coventry and to explain why the University consider the suggested amendments to Policy JE6 should be made.

(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.