

**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 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.

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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

Mr

First Name	Corin	
Last Name	Crane	
Job Title	Chief Executive Officer,	
(where relevant)		
Organisation	Coventry and Warwickshire Chamber of Commerce	
(where relevant)		
Address Line 1	Chamber House	
Line 2	Innovation Village	
Line 3	Cheetah Road	
Line 4	Coventry	
Post Code	CV1 2TL	
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	DS1: Overall Development Needs
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4. Do you consider the Local Plan Review is:

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

In terms of the provision of employment land this key policy is unsound and fails to comply with the Duty to Cooperate provisions as set out in national planning guidance.

The Councils overarching draft policy DS1 consciously does not seek to provide the estimated requirement for new employment land over the plan period as identified in the text (ref DS1(3)). This in effect undermines much of the economic vision and ambition set out in the Plan's strategy as set out in the introduction for the draft plan and also expressed through the One Coventry Plan 2022-2030.

These proposals will undermine the current local economy and hold back local economic growth. In view of how commercial, markets operate, the absence of new allocations will impact across the whole commercial market operations for the provision of land and buildings. In turn, both existing business and potential inward investment companies will continue to suffer the lack of choice and shortages of suitable premises, which as evidence suggests characterises the current commercial markets across Coventry. The Chamber of Commerce is disappointed in the Councils overall approach to economic growth which appear to contradict many of the clearly stated objectives for creating a vibrant and growing local economy and the stated ambitions for the wider sub regional economy. The Chamber does not accept that the City Council is "not able to accommodate the growth within its boundaries". This implies a physical constraint and that is not correct.

An alternative strategy based on a review of Green Belt boundaries would, in the opinion of the Chamber be able to identify sufficient land to meet the projected shortfall without compromising the key functions of the local green belt boundaries. Moreover, as an alternative there are a number of strategic areas in the land immediately adjoining Coventry's boundaries which could provide further alternatives, if there was an effective and transparent partnership arrangement between the Coventry and Warwickshire sub regional local authorities. Neither of these practical options to accommodate Coventry's growth appears to have been contemplated and properly examined in the early foregoing stages of the plan's preparation.

The Chamber also believes that the approach that underpins this policy does not reflect the Councils obligations under the Duty to Cooperate(DTC) and partnership working .This is principally because the whole process that underpins the application of the DTC across Coventry and indeed the other sub regional authorities is effectively a "black box" ;an opaque process that is not recorded in publicly accessible documents or meeting minutes and agendas .Instead, relevant bodies and potential partners seeking to engage, are unable to understand the current nature and status of joint working and how ,for example, the Council is able to advance the view that "*On going work is continuing collaboratively and constructively to address strategic need as being a constrained area no further opportunities are available in Coventry*" (para 3.13 page 17).We can see no evidence for this other than the assertion of the City Council . There are no notes or minutes of the regular liaison meetings. It is impossible to judge exactly where the whole process of liaison

,joint and partnership working currently sits .As this plan is at a relatively advanced statutory stage the approach cannot be judged to be 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.

The modification necessary to make this Policy sound will be for the Council to set out a commitment to provide a minimum of employment needs within its boundaries or alternatively the Council should publish hard evidence jointly with its neighbouring authorities to explain how any "exported "growth can be accommodated both in locational and timing terms.

The draft plan must also address with more precision and detail the issue of how Coventry's share of the overall sub regional need is to be accommodated and brought forward within the plan period. Currently the strategic "big box "need is characterised as being between 136-311 ha across the sub region (para 5.14).This in the context of this plan needs to narrowed down and much greater clarity provided .

(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. 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.

8. 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)

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

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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.