

**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

2. Agent's Details (if applicable)

1. Personal Details*

**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	Corin	
Last Name	Crane	
Job Title	Chief Executive Officer	
(where relevant)		
Organisation	C&W 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	3.16 Onwards	Policy	DS2-Duty to Cooperate and partnership working.
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4. Do you consider the Local Plan Review is:

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

As noted in the response to JE1, the Chamber of Commerce considers that across all local authorities in the Coventry and Warwickshire (CW) sub-region there is a lack of transparency and information related to the Duty to Cooperate. This makes it difficult, if not impossible, to judge how this statutory obligation is being discharged in relation to Coventry and its neighbours. For this reason, the Chamber considers that the draft policy is not legally compliant or indeed sound.

The broad sentiments set out in this policy framework are welcomed. We note the commitment of the City to partnership working but see little or no evidence of such work or regular engagement to date to substantiate the draft policy and its supporting statements.

It is recognised and established that the CW sub-region is a relatively well contained Functional Economic Market Activity Area (FEMAA). It does not seem technically difficult to resolve issues related to the distribution of strategic employment growth. However, no substantive information is published regarding what measures of agreement have been reached.

The draft policy DS2 relies heavily on the assumption that Coventry's unmet employment provision in relation to both strategic (large scale) and local employment provision will be exported to and accommodated in surrounding local authorities. At the time of this response, it has been confirmed that no formal agreements or related arrangements to make provision across local authority boundaries exist. This is surprising given the advanced stage of the plan.

In addition, the Chamber is very concerned about the lack of any information or insight on the processes of joint working and partnership arrangements. The current NPPF (Dec 2024) strengthens the obligations in relation to Duty to Cooperate, cross boundary working and joint planning initiatives in relation to strategic planning. It suggests that building economic and climatic resilience depends on partnership working (para 24) and its difficult to argue with that contention. As set out in the introductory sections of this current strategy relies on the previous NPPF but the obligations and key principles remain valid.

While the draft plan references an ambition to promote joint working and partnership working (including with the business community), the Chamber can see no real evidence of how these objectives can be achieved or indeed what work related to this policy framework has been done.

(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 Chamber is aware that correcting deficiencies in the Duty to Cooperate process cannot be done by use of the formal Modifications process either during the later stages of the plan. or by the inspector/examiner after any examination stages have been concluded.

However, such is the fundamental deficiency of the approach as set out in the strategy, it is the Chamber's current view that unless this this is effectively addressed before the submission to the secretary of state then the plan must be rejected and the Council directed to prepare a new joint working strategy that is fully transparent and reflects the status of whatever "on going work" (ref para 5.14) has taken place between the authorities. The updated version of the NPPF (Dec 2024) gives an invitation to the inspectorate at para 28 to take an "informed decision" on this matter.

(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:

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.