



Ref:

**Coventry Local Plan Review
Regulation 19**

Proposed Submission (Publication) Stage
Representation Form
(guidance note below)

(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.

-

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

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	JE1:Overall Economy and Employment Strategy
-----------	--	--------	---

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 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.

As noted in the text this policy, JE1, should create a framework that facilitates “a pivotal role of the City in the ambitious growth agenda for the region”. The first point to make is that the rhetoric in this policy is not matched by the proposals that underpin the policy. While the City Council has indeed set out an ambitious growth agenda, the proposals themselves fail to meet projected employment need. Instead, as noted elsewhere they seek to effectively “export” economic growth to surrounding areas. Overall, the policy cannot be said to match the objectives that support it. For this central reason the policy is unsound.

In addition, the absence of any formal arrangements between local authorities or specific additional information regarding the task of to accommodate the unmet need in surrounding local authority areas, the Council’s stated approach appears currently impossible to achieve.

This policy seeks to provide a “*readily available range and choice of employment sites and premises to meet projected need over the plan period*”. It fundamentally ignores a body of evidence (for example the background studies undertaken by Ilene , the C&W Market Signals Study of 2017, and the direct experience of members of the Chamber of Commerce) that highlights gaps in existing provision and land and premises and by not adding in any new employment land allocations it compounds existing shortages across many types of land and premises. For example, freehold tenure smaller sites and business units available for small and expanding local businesses are in very high current demand and are in very short supply in and around Coventry.

The proposed employment land provision relies substantially on allocations made in the 2017 adopted Local Plan. These sites have been slow to come forward and there is little evidence that the Council has been proactive in seeking to bring many of these sites forward. Moreover, there is no indication in the policy framework of timing- when the City Council thinks these sites may indeed come forward and contribute to a pool of readily available sites and premises.

In terms of Policy JE1(d) which aims to protect existing employment sites and prevent their redevelopment for non-employment uses is strongly welcomed by the Chamber of Commerce and reflects policies in neighbouring areas that seek to protect existing stock. The Chamber considers this policy in a separate submission below.

(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 noted in the response to policies DS1 & DS2 ,the Chamber considers a new approach is needed to seek to accommodate all the city's projected employment requirements within its boundaries .As an alternative the Chamber has suggested that consideration could be given to looking to accommodate exported growth in surrounding areas .However, the absence of any information relating to the status of current joint working between authorities across the sub region means it is difficult to form a view whether this is an achievable and realistic approach .
The inspector /examiner of the plan will need to take an informed judgement on this key issue.

(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)?

☐

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.

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.