

**Coventry Local Plan Review
Regulation 19**

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

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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 Policy

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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.

The draft Policy is fundamentally unsound because: (i) it fails to allocate sufficient land to meet the estimated requirements of 105 ha over the new plan period to 2041, (ii) it fails to adequately address in any detail how Coventry City proposes to deal with the identified “strategic “need of 136-311ha of employment across the sub region(as identified in the C&W
As argued in the response to DS1 the City’s contention that it is unable to meet in full its needs is disputed.

The allocations set out in this Policy are sites originally allocated in the current adopted plan from 2017 and have been identified originally say 10 years ago through the early stages of this plan’s preparation. There is no indication about effective timescales how the identified sites will come forward over the plan period. The sites listed do not represent a broad spectrum of employment land,as is suggested , and while some sites listed are in part delivered, the two major sites listed have no firm timescales attached to them in spite off being identified several years ago. These sites at Eastern Green and Bagington Fields still have uncertainty related to their timing and contribution to a “readily available” supply over the plan period to 2041.The plan fails to address or analyse the market sectors this policy may apply to.

The policy indicates that a “*balanced portfolio of employment land supply offering a choice of sites will be maintained*” suggesting that the proposals are bringing forward such a portfolio. This is not supported by evidence detailing how each of the listed sites is likely to contribute to particular market sectors.

As noted, the policy also relies on “exporting” a residual 45ha Coventry’s growth yet provides no solid evidence of how this significant amount of land will be accommodated and implying that at some future date arrangements can be put in place to accommodate this employment land in surrounding local authority areas .There is no indication of timescales or indeed the potential locations for the distribution of the 45ha.

This contributes to making the draft policy unsound. In addition, as noted above this overall lack of any detail or information undermines the way the Duty to Cooperate is approached in this draft plan .

While the identification of Key Employment Sites in JE2(5) is welcomed it seems puzzling that Bagington Fields is not included in the list of these sites.

(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 our earlier response ,remediation to address the deficiencies of this approach will require either modifications to oblige the Council to meet its full requirement within the City boundaries and/or a fundamental change to set out a clear and transparent partnership basis for distributing unmet employment needs to surrounding local authority areas .The latter route is more difficult because the development plans in the surrounding and adjoining local authorities are all at quite different stages in the plan process and do not share common timescales .This may be a case where the inspector /examiner must apply discretion as advised in the latest NPPF guidance.

(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.