



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.

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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		
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	9.2 onwards	Policy	Policy GB1 Green Belt
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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 basis of the proposed draft policy is to set aside the opportunity to re examine the tight boundaries of Coventry's Green Belt and maintain the existing boundaries. As the Chamber has set out in its responses to the Overall growth policies (DS1) and employment policies (JE2 etc), the failure to address and review the Green Belt around Coventry establishes a planning framework that will stifle future growth and the opportunities for economic expansion. The Chamber rejects the approach that the Council is unable to identify only part of employment land need within its boundaries -it has chosen to insist there are no land opportunities and ignore areas of land, albeit designated as green belt that are suitable to accommodate new commercial growth, and which would not compromise the long established functions of Green Belt as set out in para 9.1.

Moreover, the linking of the policy framework to the NPPF 2023 ignores important changes set out in the NPPF December 2024. This cuts across current government national policy by the application of a policy in relation to the Green Belt that sets aside the governments ambitions to ensure Green Belt is reviewed and to exclude consideration of important proposals such as the concept of "Grey Belt". The latter provisions could provide important opportunities to bring forward smaller areas of land from the adopted Green Belt and see this brownfield type of sites being identified and developed for small scale new employment opportunities.

A review of the Coventry Green Belt boundaries would also bring into play consideration of the Green Belt boundaries adjoining the urban area of Coventry which are in surrounding local authorities. There is an opportunity here to promote joint working and, in part, identify practical solutions to meeting both local and strategic employment needs by releasing parcels of land on an agreed basis and under the provisions of the Duty to Cooperate.

The Chamber is of the view that there are significant areas around the City boundaries where the defined Green Belt functions would not be undermined by selective releases from current GB that could provide both employment land and if needed additional land for housing .Such actions would support the vision and objectives that seek to underpin this draft local plan .(for example, The area specific areas at Ryton ,in and around Ansty Park, adjoining Coventry Airport ,land at Warwick University and in adjoining areas of Nuneaton Borough that could meet future growth requirements for a range of uses .)

The Chamber has commented throughout this submission of the failure to provide any substantive information relating to the status of work by all the local authorities related to partnership working and specifically to Duty to Cooperate provisions. This makes it difficult to comment on the exact balance between urban capacity within the city boundaries and the potential to export some of that growth to surrounding areas.

(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 of Commerce believes that the Council should be obliged to follow the current government policy guidance set out in the latest and most up to date version of the NPPF published in December 2024 before the formal release of this draft publication version of its plan .It calls on the council to amend this policy and review the GB boundaries before the draft plan is submitted to the Secretary of State.

(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.