



## **Coventry Local Plan Review Regulation 19**

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

**(For official use only)**

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**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](mailto: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](http://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**

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**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.*

**2. Agent's Details (if applicable)**

Title

c/o Agent

Mr

First Name

John

Last Name

Pearce

Job Title

Associate

(where relevant)

Organisation

Barberry Ansty Ltd.

Harris Lamb

(where relevant)

Address Line 1

4<sup>th</sup> Floor

Line 2

4 Brindley Place

Line 3

Line 4

Birmingham

Post Code

B1 2LG

Telephone Number

E-mail Address

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**Part B – Please use a separate sheet for each representation**

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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="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Y"/>	No	<input type="text"/>

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.

**Policy DS1**

Barberry object to Policy DS1 principally in respect of the approach taken to meeting the Council's employment land requirements. Part 3 of the policy confirms that the Council's employment land requirement is 105 hectares over the period 2021 to 2041. However, the supporting text at paragraph 3.14 confirms that there is only 45 hectares of available land within the City to meet this need. Part C of the policy states that the Council will work with its neighbours to ensure that the shortfall is met through the Duty to Cooperate.

We note the provisions within Policy DS1 that state the Council will work with its adjoining neighbours on site that are adjacent to the boundary in order to work proactively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire. In light of Barberry's interests at Junction 2 of the M6 the site is located on the edge of Coventry albeit within Rugby Borough and has been promoted to Rugby as a suitable site for employment development.

Barberry are, however, concerned with this approach and whether the policy is sufficiently robust to ensure that the shortfall will actually be provided elsewhere. We note that the Council have previously signed a Memorandum of Understanding

("MoU") with its adjoining neighbours on employment land when adopting the current Local Plan. This MoU set out where and how much land each of the adjoining authorities had agreed to provide to meet Coventry's needs.

Barberry contend that the Council should enter into a similar agreement MoU with its neighbours in order to ensure that the shortfall of employment land will be addressed through the various Local Plans to be prepared in the HMA authorities.

As it stands, we do not consider that the policy is sound as it will not be effective in delivering the Council's employment land requirements.

(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.

In order to address our concerns we would wish to see a signed MoU presented to the examination that sets out where and how much land each of the adjoining authorities had agreed to provide to meet Coventry's needs.

Should there be a requirement to reach agreement with its adjoining neighbours then the land at Junction 2 would in our view be a suitable site to be allocated for employment use to meet either the needs of Rugby or Coventry.

(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)

☒

**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:

We would like the opportunity to present our views to the inspector and discuss the issues orally

***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.***