

## Coventry Local Plan Review

### Regulation 19

#### Proposed Submission (Publication) Stage Representation Form

(guidance note below)

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

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Name or Organisation:

1. To which part of the Local Plan Review does this representation relate?

Paragraph	<input type="text" value="9.1-9.17"/>	Policy	<input type="text" value="Policy GB1: Green Belt"/>
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2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

3. 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 submitted Regulation 19 Coventry City Council Local plan policy DS1 “overall Development Needs, bullet points 3 and 4, are not legally compliant, sound or comply with the Duty to co-operate because:

**1. Local Plan Review – Duty to Co-operate Statement.**

Page 11 of this document states that:

*“As with Housing, the HEDNA was the starting point for assessing employment need. However work was also ongoing across the wider West Midlands region in terms of assessing strategic site (ie ‘big box’) needs as this has different site and locational requirement to local employment provision. The West Midlands Strategic Employment Sites Study (WMSESS) was finalised in September 2024, the result of a partnership of those authorities engaging in the West Midlands Development Needs Group referenced earlier in this paper. **This details ‘opportunity areas’ for further exploration, and for Coventry this relates to ‘Area 7’ which will primarily relate to further joint working with Rugby Borough. Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions will be required as Rugby progresses its local plan.***

*On this particular (employment) issue, the total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. **From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment.***

***Discussions are ongoing through CSWAPO and with the linked duty to Co-operate Group and associated Local Authorities in regard to this matter, but this currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation. The authority is continuing to work to develop an MoU with partners and working to establish Statements of Common Ground.***

## **2. The HEDNA Alignment Paper**

Considers that Coventry City Council should provide 105 ha of new Employment Land (B2 and B8) **excluding any contribution to the strategic “big box” needs of the sub-region.**

### **Planning Assessment**

Paragraphs 24-27 of the NPPF of December 2023 sets out National Planning policy relating to maintaining effective co-operation in the plan making process, including the need to provide Statements of Common Ground.

The Regulation 19 submitted plan’s evidence base does not provide Statements of Common Ground with Coventry’s adjacent Local Planning Authorities which specifically identifies employment site allocations for employment uses which meets the shortfall of employment land of 45 hectares so as to meet Coventry’s employment needs either inside or outside its administrative boundaries – as well meeting strategic “big box” employment needs of the sub region.

*(Continue on a separate sheet /expand box if necessary)*

4. 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.

To make the Coventry City Regulation 19 Local plan sound, the following changes are required to the submitted Reg 19 Coventry City Plan.

1. At least 45 hectares of land for employment use needs to be also allocated outside Coventry's administrative boundaries. This excludes additional employment land required to meet strategic "big box" needs of the sub region.
2. Statements of Common Ground between Coventry City Council and Coventry's neighbouring Local Planning Authorities need to be prepared and proposed sites subject to separate public consultation, identifying major new employment sites which will meet both Coventry's and the West Midlands employment needs both within and also outside Coventry's administrative boundaries.
3. These sites then need to be identified within the Reg 19 Coventry Local Plan and also in the forthcoming neighbouring Local Planning Authority's Reg 19 Development plan reviews for submission in 2025/26.
4. If Statements of Common Ground identifying major sites which can deliver the shortfall of employment land cannot be agreed between Coventry City Council and the adjacent Local Planning Authorities then there needs to be a new employment policy within the Reg 19 Coventry City Local Plan.
5. This new employment policy would support new employment site allocations on sustainable development sites within close proximity to the City's own administrative boundaries which can deliver both Coventry's and the sub regions employment needs.
6. To deliver the acknowledged shortfall of employment land, the Coventry Local Plan also needs to have a policy which states that the green belt boundaries of all of Coventry's adjacent Local Planning Authority's need to be reviewed in order to help the delivery of major new employment sites.
7. Some of the identified new major employment sites will therefore need to be released from the green belt because there is evidence that there are "exceptional circumstances" to do so and the these sites also no longer meet green belt designation criteria or are identified as "grey belt sites" in accordance with the NPPF of December 2024.

(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.**

5. To which part of the Sustainability Appraisal (SA) report does this representation relate? Paragraphs

4.116 to 4.132 & Table 4.7(b); 6.1 to 6.4; 6.22 to 6.23; 7.10

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

6. 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

**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.

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is necessary to attend hearing sessions relating to duty to co-operate and statements of common ground relating to employment land requirements. Attendance is necessary in order to further examine the Council's own evidence base relating to employment need and soundness of the submitted plan.

(Continue on a separate sheet /expand box if 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.