

Dear Mr. Spencer,

Coventry and Warwickshire Chamber of Commerce's detailed submission in response to N&B BC's Consultation Draft Local Plan of January, 2017

The C&W Chamber of Commerce has represented the interests of the business community in our sub-region for over 130 years. We believe we are a trusted "voice of the economy" and –as such– take our responsibilities very seriously as a partner, working with many other organisations in the public and private sector, to plan for and deliver a sustainable economic future for our area and the people and businesses we serve.

Over the last 5 years we have been working with our Local Authority and LEP colleagues across all our 7 Local Authorities to create new Local Plans for the 20 years to 2031. The Chamber has been involved in all the preliminary discussions at a sub-regional level to determine and chart out what were the key issues our (6) Local Plans should address. Via our Local Branch meetings across the sub-region the (respective) emerging and developing Local Plan has been a regular item on our Local Branch agendas, and –early on– we created an informal working group of relevant Members to work together to input and oversee the progress of Local Plans. We've also involved and briefed our local MP's and –where appropriate– we've contacted and briefed relevant Government Ministers and regional organisations when we encountered issues that had to be addressed at more than just local level. It's from all of this work that the Chamber has contributed informally and formally to the Local Plans and has – as appropriate– made detailed responses to the (individual) Local Plans at different stages of their progress.

The Chamber is strongly supportive of the ambitious but essential plans for economic growth of our sub-region and our own programmes of "Prosperity through Growth" and "Go for Growth" have helped/continue to help our Member companies make their own important contributions to that economic growth.

As a Chamber we are an active partner but also "critical friend" to all our Local Authorities and we see it as part of our responsibility to sometimes have to say things that can be "challenging" to our partners as well as register our support and encouragement when we see them acting positively and proactively to create the future we all aspire to –recognising that –as democratically-elected bodies – they often have to bring forward ideas and make decisions on important issues that can be controversial at a local level and with different pressure groups and communities.

As we have done with other authorities the Chamber made a detailed and thought-provoking submission in March, 2017 in response to Nuneaton and Bedworth BC's January, 2017 Consultation Draft Local Plan 2011 to 2031.

Unfortunately we now understand that – as our Submission was received by N&B BC a few days after the "due date" for receiving such Submissions– that our comments, concerns and positive

proposals had not been accepted as valid and "on the record" and "in the public domain" when it comes to the overall planning process.

By the nature of how the Chamber works and the positive engagement and input we always seek from our Members, it is sometimes a time-consuming process to pull together, discuss, agree and communicate a collective and well-thought-through and positively-focussed response to consultations impacting upon our area.

After some significant research, discussions and drafting the Chamber submission was agreed by the end of February, 2017. We are sorry that it didn't reach you before 13 March, 2017, and that is our responsibility which we accept.

(In the paragraphs below in recognition of the impartiality and objective nature of the Planning Inspector's role, we refer to "the Planning Inspector" in the third-person even though this letter is addressed to you, Mr. Spencer, as N&B's appointed Planning Inspector.)

We are one of the many bodies recognised as "Statutory Consultees" i.e. those bodies thought most likely to have an important contribution to make by way of the responsibilities they have and the broad span of interest and engagement they seek to represent.

We now understand that –from the "Statutory Consultees" list promoted by N&B BC- some 5 organisations (including ourselves) did not submit their responses by the "cut-off" date of 13th March, 2017. The other 4 organisations are Government Agencies, and indeed the Chamber's submission was not the last to be received.

N&B's Consultation Statement (para. 5.34) says that "Late responses were received from the following statutory consultees which meant that they could not be considered duly made: Sport England, Network Rail, Natural England, Environment Agency, C&W Chamber of Commerce."

The Planning Inspector's letter back to N&B of 12th July, 2017 relating to "submissions after the closing date of 13th March" says that of the 5 "late" organisations (above) he will actually "make an exception" and accept 4 of the 5 Submissions and "put them before the examination".

Strangely – and for whatever reason- only the Chamber Submission of the 5 "late" statutory consultee's responses is to be "disregarded" (my word not the Inspector's).

We are advised that the Inspector says that the submissions from the 4 public agencies say things that are relevant to the process but he doesn't say why the Chamber's Submission shouldn't be seen in the same regard.

We fully realise that the Chamber's Submission, particularly:

- its concern about the "scale of ambition" at the heart of N&B's Local Plan,
- its reservations about whether N&B has responded as positively as it might to its "Duty to Cooperate" responsibilities;

-its questioning of whether N&B has explored all realistic means of meeting its 2-fold “obligations” under the Memorandum Of Understanding (MOU) approach to helping to meet Coventry’s “unable-to-be-met-within-its-boundaries” needs in terms of the disaggregated sub-regional targets for new housing and employment land AND focussing these efforts to help Coventry by bringing forward new land availability on a cross-boundary or directly-adjacent to Coventry basis , such that these could best respond to Coventry’s accepted needs, and

-(a primary concern for the Chamber right across the sub-region) whether N&B (and other LA’s) have done as much as they can to positively and proactively respond to the (now proven and accepted) inadequate targets and supply of new employment land to adequately respond to the needs of our growing economy, and to provide jobs for our growing population,

will prove “challenging” in the consideration of N&B’s Local Plan as it presently stands.

As we always try to do, the Chamber has put forward positive and practical proposals for how-we believe-N&B’s Local Plan could be so much more powerful and meaningful – both for the people of N&B but also in helping N&B make a greater and greater positive contribution to the future of the sub-region.

For all the reasons summarised above, the Chamber is concerned that “the voice of business and the economy” might not be heard and understood if the evidence, arguments and proposals put forward in the Chamber’s requested response to N&B BC’s Consultation Draft Local Plan January, 2017 are not accepted as part of the information that will be “put in the public domain” and therefore be considered as part of the Public Examination process.

We would respectfully ask N&B’s appointed Planning Inspector to reconsider the situation and accept the Chamber’s “late” submission in the same terms as he considered and -“as an exception”- accepted the “late” submissions of the other 4 Statutory Consultees.

Since in our Submission we also asked for the opportunity to present our concerns, arguments and ideas as part of the relevant sections of the Public Examination process, we would hope that – whatever the outcome of the Planning Inspector’s consideration of the aspects above- the Chamber would be invited to be involved in the Public Examination, which we believe is now being “pencilled-in” for October, 2017.

Yours Sincerely



Louise Bennett

CEO, Coventry and Warwickshire Chamber of Commerce