

# **Coventry City Council**

## **Coventry Local Plan Review**

### **Issues and Options Consultation**

#### **Regulation 18: Consultation Statement**

**Sept 2024**

## Contents

<b>1. Introduction.....</b>	<b>3</b>
<b>2. Consultation Approach.....</b>	<b>4</b>
<b>3. Responses to the Consultation.....</b>	<b>7</b>
Table 1: Regulation 18 and SA Responses Summary Report.....	12
<b>Appendix 1 – Comments Form .....</b>	<b>79</b>
<b>Appendix 2 – Press release.....</b>	<b>82</b>
<b>Appendix 3 – Social media analytic report.....</b>	<b>84</b>

## 1. Introduction

1.1 Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017. The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing, rewriting or deleting, to reflect changes to national policy or other matters.

1.2 As part of this process, the Council undertook an Issues and Options Consultation between Tuesday 18 July and Friday 29 September 2023. This offered the opportunity for comment on our ideas for updating the plan, in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012. This was supported by the Sustainability Appraisal Initial Report and Equalities & Health Impact Assessment, on which comments (representations) could also be made during the consultation period.

1.3 The purpose of this consultation statement is to set out how the Council undertook this consultation and the findings that emerged from it. The following document summarises how the Council consulted, who was invited to make representations, the comments that were received and how we have responded to these in the Local Plan Review.

1.4 The Council received 930 separate responses resulting in 1719 individual representations during the Regulation 18 consultation. This statement summarises the main comments received and the Council's response to them when reviewing the local plan.

1.5 This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012. This states that a Consultation Statement has to be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18;
- How those bodies and persons were invited to make representations under Regulation 18;
- A summary of the main issues raised by the representations;

- How any representations have been used to inform the review.

1.6 The Consultation Statement will assist the Inspector at the Examination in determining whether the Councils Local Plan Review complies with the requirements for public participation and government guidance. The report shows that the consultation carried out by the Council has complied with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). The report also shows that public engagement was carried out following the approach set out in the Councils Statement of Community Involvement (SCI)<sup>1</sup>.

## **2. Consultation Approach**

2.1 There is considerable flexibility open to Local Planning Authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, in respect of consultation, and with the commitments made within the Councils Statement of Community Involvement (SCI).

### **Promotion of the consultation**

2.2 Consultation on the Local Plan Review Issues and Options (Regulation 18) document took place between 18 July 2023 until 29 September 2023.

2.3 The Regulation 18 consultation was promoted through a variety of means.

- Formal notifications of the consultation were sent via the Council's consultation management system to the specific and general consultation bodies set out in the SCI as well as other individuals and organisations on the Councils Local Plan consultee database that requested to be notified. Follow-up emails were also sent out when the consultation was extended (the deadline was initially 12<sup>th</sup> September and was extended to 29<sup>th</sup> September 2023).

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<sup>1</sup> [https://www.coventry.gov.uk/downloads/file/37080/statement\\_of\\_community\\_involvement\\_july\\_2021](https://www.coventry.gov.uk/downloads/file/37080/statement_of_community_involvement_july_2021)

- A follow up email was also sent to all of the statutory Duty to Co-operate bodies requesting that they take note of the consultation and contact the council if there were specific strategic issues they wished to discuss.
- The Councils Planning Policy bespoke Local Plan Review webpage was used to outline the Local Plan Regulation 18 consultation events. This gave people access to information on the consultation as well as the Issues and Options consultation document, a non-technical summary, the Sustainability Appraisal document, the Equalities & Health Impact Assessment document and other supporting documentation including the evidence base and a series of topic papers. A video was also included which explained the review and how people could respond.
- The Issues and Options consultation, the Sustainability Appraisal documents, and the Equalities and Health Impact Assessment document were all made available online and in hard copy at the Council House and in public libraries. Libraries have specific facilities to enable disabled users to access the consultation material including large print screens. The response form template can be seen at Appendix 1.
- A press release was issued on 23<sup>rd</sup> July 2023 (see Appendix 2).
- Social media was also used (see Appendix 3 for the report on this use) and this included:
  - 15 posts on Facebook and X, and 2 on LinkedIn, on the Councils official social media accounts during the consultation period.

### **Consultation events and Hard to Reach Groups**

2.4 A comprehensive round of drop-in sessions were carried out across several public libraries which involved officers answering questions and making available the Issues and Options consultation documents to anyone who attended. These included the following events:

Location	Date and Time
Central Library	22 July 2023, 10am – 12noon
Earlsdon Library	27 July 2023, 2pm – 4pm
Hillfields Library	28 July 2023, 12noon - 2pm

Location	Date and Time
Aldermore Library	1 August 2023, 11am - 1pm
Jubilee Library	8 August 2023, 5pm - 7pm
Bell Green Library	11 August 2023, 3pm - 5pm
Coundon Library	14 August 2023, 2pm – 4pm
Central Library	19 August 2023, 10am – 12noon
Central Library	23 August 2023, 9am – 11am
Stoke Library	24 August 2023, 5pm - 7pm
Keresley Library	30 August 2023 3pm - 5pm
Tile Hill Library	1 September 2023, 10am – 12noon
Cheylesmore Library	5 September 2023, 10am - 12noon
Willenhall Library	7 September 2023, 12noon – 2pm

2.5 The image below is an example from one of the library drop-in sessions.



2.6 A webinar was held for the public on 11<sup>th</sup> September 2023 which was attended by 12 people from the local residential and business community.

2.7 Hard-to-reach groups, who may be affected by the review of the local plan, were proactively invited to discuss the review with officers in a way which was best suited to their needs including targeted workshops, and / or attendance at their own group meetings and venues. The outcomes are set out in Section 3.

## Feedback

2.8 Comments from all respondents could be provided in various ways, including:

- Comments forms (available both online and hard copy versions);
- Online, directly via Inovem (the Council's consultation system);
- Submission of letters and emails.

## 3. Responses to the Consultation

3.1 As a result of the methods outlined in Section 2, a total of 1719 comments were received against all questions by 930 separate respondents during the consultation.

3.2 Comments were received from a wide range of individuals and organisations including statutory and non-statutory consultees, special interest groups, individual residents, developers and their agents.

3.3 A summary of all responses submitted and how the review has responded to these is set out later in this chapter (*Table 1*). In terms of the various workshops and meetings held these are summarised in the below paragraphs.

### Hard to reach groups

3.4 As previously mentioned, Council officers attended a range of separate meetings where specific engagement was proactively sought with suggested local hard to reach groups. Several responded and the main points raised (and the Council's response) are as follows:

#### *Carriers of Hope: Supporting Refugees, Asylum Seekers and other Migrants*

3.5 Key points raised included concern over regeneration and the relocation of businesses, a need for well-funded community spaces, the need for decent affordable housing of the right size to meet a variety of needs, the need to maintain existing stock (for example broken lifts), lack of amenity space in housing, long waiting lists, the need for well-maintained green space, and too much student accommodation.

3.6 Council's response: whilst some issues are outside of the scope of what the Local Plan can do (e.g. maintenance issues), the need to improve building standards and support the provision of community and green spaces as well as ensuring that the right

kind of housing stock is delivered over the plan period is very much within the scope of the plan review and these issues are being addressed especially through the housing, community, green infrastructure and environmental management policies of the plan.

*St Francis of Assis Church, Radford (Providing support on employment, skills, ESOL, community support, volunteering, a foodbank and a social supermarket)*

3.7 Concerns were raised about the lack of council housing, the amount of student accommodation and the number of Homes in Multiple Occupation (HMOs).

3.8 Council response: the need to rebalance the type and amount of housing – including student accommodation - is recognised and forms an integral part of the review and update of housing policy. In terms of the issue of HMOs the Council is producing a separate Development Plan Document to manage planning policy on this issue to ensure standards are improved and has also introduced an 'Article 4 Direction' to manage the situation in those wards where the situation faces the most pressure.

*Earlsdon Retirement Village*

3.9 Comment was made about uneven and badly maintained pavements, tree routes, poor lighting, parked cars on pavements and dropped kerbs in wrong places makes mobility hard for elderly people, especially those with mobility scooters. There was also concern about the city centre and local shops, which are shutting and there is a lack of independent shops.

3.10 Council response: maintenance and traffic enforcement issues sit outside of the local plan, but the relevant teams have been made aware of the comments. The local plan policies on design, accessibility and traffic management are being reviewed and updated. In terms of the comments about shops shutting down (and the lack of independents shops) much of this is due to changing shopping habits and market forces. However, the local plan policies will encourage a variety of uses in town centres and will also support improvements to the local environment to help them attract footfall.



### *Multi-Faith Group*

3.11 The group considered the creation of a religious quarter around Hillfields, better linking up and making it easier for people from outside the area to visit the different significant places of worship. It was commented that there is a lack of housing for large families. There are parking problems on inner city streets especially when large events happen, and electric vehicle charging points are now taking room up. It can be hard to get permission to extend a place of worship, so sites further afield have to be sought. New housing developments should include community space and places of worship.

3.12 Council response: the need for religious and community facilities is noted and the policies of the plan are being reviewed to ensure they are flexible to meet a variety of needs. Parking and travel policies are being updated so they are more reflective of the Council's adopted transport strategy. In terms of housing the policies are to be updated to be reflective of evidenced local need.

### *Disability Equality Action Party (DEAP)*

3.13 The group commented that there is not enough housing for people with disabilities. All properties should be wheelchair accessible. Pavement design, signage and the distance between disabled parking and places is crucial to allow disabled people to move and navigate traffic as easily as able-bodied people. Accessible public toilets should be an obligation of all planning permissions along with cameras and good lighting. Housing developers need to consider from the outset that all facilities provided are inclusive, such as gyms, which are not always suitable for people with disabilities.

3.14 Council response: the issue over housing accessibility and adaptability is being addressed through reviewed planning policy including the introduction of wheelchair-accessible standards. In terms of the other comments, these are being considered through a review of the design policies of the Local Plan.

### *Homelessness Forum*

3.15 Following a discussion there was broad support for the proposed changes to policies H4, securing a mix of housing and H6, affordable housing to reflect and promote the councils preference for social rent. It was agreed that all major

developments should demonstrate how health issues have been addressed and that a checklist would be a good idea.

3.16 Council comment: the comments from the discussion have been noted in terms of taking the review forward.

#### *WMCA Homelessness Unit*

3.17 It was commented that the flow of new people makes it a continuous challenge, but there is enough specialist homeless accommodation in Coventry, however, there are many reasons why people don't use it from substance abuse, safety, trauma, not wanting to lose their street community and so on, it is very much down to an individual's preference and personal situation. In wider terms, housing initiatives rely on social housing and landlords but there is a lack of stock in both the public and private sector.

3.18 Council response: the comments relating to specialist accommodation are noted, and in terms of the wider housing issues these are being considered through a review of the housing policies of the Local Plan particularly in terms of the affordable housing policy.

### **Business and community**

#### *The Federation of Small Businesses (FSB)*

3.19 A meeting was held with the Federation of Small Businesses. Feedback highlighted a lack of incubator, grow-on, hotdesking, coworking, and shared spaces. There is no suitable space for creative, digital or freelance companies. Affordability and T&Cs for small business are often not viable. Permitted Development rights should be removed to protect key office space. Concern over the loss of independent businesses because of regeneration schemes. Rail connections to and from Coventry are poor – to and from Warwick is difficult and there are only 2 trains to London per hour post-covid. Car parking charges too much in city centre. Deliveroo, Uber eats, having effect on footfall in city centres.

3.20 Council comment: the need for a range of business unit sizes and flexible and adaptable spaces is recognised and the policies will be updated to reflect this need in

line with an updated local evidence base. Some of the issues raised are beyond the scope of the local plan such as changing patterns of takeaway delivery although the policies of the plan are being reviewed so that they reflect national policy on town centres to ensure they remain vibrant and viable. Accessibility and travel are being addressed – where they are within scope of the local plan – in line with the Council’s recently adopted transport strategy.

#### *Other events*

3.21 The Council attended a business engagement event to give a presentation on the Local Plan Review on 6<sup>th</sup> September 2023, hosted by Marrons and similarly a Breakfast Event hosted by the Coventry and Warwickshire Chamber of Commerce on 8<sup>th</sup> September 2023. The Council also attended a local plan-focused workshop held by the Coventry Society on 5<sup>th</sup> September 2023. At all events officers advised on how to respond to the consultation.

#### **Comments from individuals and organisations**

3.22 The key issues raised by respondents to the consultation are summarised in *Table 1* below. A comprehensive capture of all respondent comments can be found online. Alongside the Local Plan Review Issues and Options Document, the Council also published a Sustainability Appraisal (SA) initial report and an Equalities/Health Impact Assessment (EqIA), and these documents were all available for public comment. Comments were received in respect of the SA (summary included in the table below) and no comments were received in respect of the EqIA report.

Table 1: Regulation 18 and SA Responses Summary Report

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Chapter 2 review - Health and Wellbeing</b>			
<b>Review of Policy HW1 Health Impact Assessments (HIA)</b>			
Q1 Do you have any comments on our proposal to expand policy HW1 so that all major developments are required to demonstrate how health issues have been considered and addressed either within the Design and Access Statement or separate supporting health statement?	<p><b>Context:</b> currently the trigger for requiring Health Impact Assessment relates to residential developments of 150 homes or more. Given that so many developments are smaller than this in Coventry it was queried whether the threshold should be lowered, and whether there could be other ways of ensuring major developments (10 or more homes) should demonstrate how they have taken account of health issues.</p> <p><b>Responses</b> (37). Of these, 15 supported, 10 objected and a range of other comments were received. Those supporting felt that the Health Impact Assessment should also be updated, and that PBSA should be included. Those objecting said that this would be excessive, that the process was unclear. Others commented that it would be appropriate to consider health impacts through the Design and Access Statement, that a change to the threshold would need to be justified, and that Health Equality Impact Assessments would be more affected. Others commented on the need for health infrastructure. One commented that there was no Health Impact Assessment for the Regulation 18 document.</p>	<p>Expansion of the policy to ensure major applications (10 dwellings and over) have regard to health and wellbeing will be considered further, and it is important that this is proportionate and manageable both for those preparing applications and for those assessing them. It is also important to be clear and not duplicate other policies. Proposed that this is done through Design and Access Statement and that the SPD is expanded to provide further guidance.</p> <p>Propose that PBSA and other forms of residential development should also require HIA. In terms of the comment on a Health Impact Assessment of the Regulation 18 document itself, this was included with the Equality Impact Assessment and</p>	Update policy to include a requirement to have regard to health via Design and Access Statements and further guidance to be included in an updated Health SPD.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
		was consulted upon as part of the process.	
Q2 Do you have any comments on the proposed checklist and its content?	<p><b>Context:</b> in relation to the suggested policy change to HW1 (above) it was proposed that a checklist should be introduced for major developments that did not meet the threshold for a full Health Impact Assessment to ensure that they still account for health in their development proposals.</p> <p><b>Responses</b> (29). A number of respondents suggested topics which they felt should be included e.g. transport, parking, energy efficiency, active lifestyles, health infrastructure, air quality. Some felt health should not be 'split out' but should underpin all policies, others said it was too onerous or duplicated other policy areas. Some were concerned that health related infrastructure had not been delivered. It was commented that neighbourhood planning could play a role.</p>	See above. Consideration will be given to the best way of ensuring that health issues can be addressed through the process, working closely with Public Health and taking into account the proposed review of the Health Impact Assessment SPD.	See above comments.
Q3 Given the significant implications development proposals can have on people's physical and mental health, what do you think the proportional threshold for housing	<p><b>Context:</b> options were proposed for reviewing the threshold for requiring a full Health Impact Assessment for development proposals.</p> <p><b>Responses</b> (25). A mix of responses were received. Some felt HIA should be required on a case-by-case basis others had differing views on what level should trigger a full HIA. Some felt other developments should also require HIA (not</p>	In terms of the threshold this is set though the explanatory text to policy which is then pulled through into the Health Impact Assessment SPD. A review of the SPD is underway, and this will be consulted on in due course.	Threshold to remain as per current policy, however it will also be clarified that PBSA and

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>developments requiring a full HIA should be:</p> <p>A. Unchanged – 150 dwellings or more – please explain why</p> <p>B. 100 dwellings or more – please explain why</p> <p>C. 50 dwellings or more – please explain why</p> <p>D. Other – please explain why</p>	<p>just residential). Others felt the Design and Access statement was an appropriate place to address health matters.</p>	<p>There was no clear consensus on whether the threshold triggering full HIA should change therefore it is recommended this remains the same. However, it should also be clarified that PBSA and other types of residential accommodation will require HIA if these are for 150 bedspaces and over.</p>	<p>other types of residential accommodation will require HIA if these are for 150 bedspaces and over.</p>
<p>Q4 In terms of Outline applications and given how development proposals can change between outline approval and the reserved matters stage, when should HIAs and health checklists be required?</p> <p>A. At Outline stage only – please explain</p> <p>B. At Outline and reserved matters stage – please explain</p>	<p><b>Context:</b> this question was aimed at exploring the detail of implementing policy on requiring Health Impact Assessments and other health related information and at what point in the decision making process this should be required.</p> <p><b>Responses</b> (33). The majority (16) felt that it should be required at both stages. However, there were 8 objections, with respondents feeling this would be unduly onerous. Others made recommendations and suggestions: HIAs should only be required at outline unless it was clear further detail would be needed later, they should only be required for full / reserved matters applications, the HIA should set out broad principles / parameters for outline applications (which could sit within a DAS or be dealt with</p>	<p>Any outline approval would include a requirement to undertake HIA at the Reserved Matters stage.</p>	<p>No further change.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	through a screening approach) then could move into a full assessment at Reserved Matters Stage.		
<b>Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate</b>			
<b>Review of Policy DS1: Overall Development Needs</b>			
Q5 Do you have any comments on the Council's view that it should be using the HEDNA figure with the 35% uplift removed to establish its local housing need?	<p>The majority of responses (30 out of 48, primarily from the development industry) objected to the removal of the 35% from the calculations. Various reasons were given, the most common being that this was a departure from national policy. Many felt that the approach undermined the HEDNA (and cross boundary working) and that the needs of the HMA should be dealt with as a whole. Other reasons given were that this was not positive planning, lacked ambition, would compromise economic development and also the delivery of affordable housing, and any shortfall should be exported.</p> <p>Several respondents (12/48) did support the proposal however as they consider the uplift is not evidenced, it is arbitrary (as shown by an LUHC cross party report), a similar approach is being followed elsewhere, too much housing will unbalance the economy, the 35% does not address local need.</p> <p>A range of other comments were made on more general issues such as all projections being too</p>	<p>In terms of the 35% being part of the standard method (NPPF 2023), this is acknowledged to be the case although this does not mean it is fair, evidenced, reasonable or justifiable as a national approach and has not been factored into the NPPF to meet local need but is aimed at meeting a national housing target.</p> <p>The HEDNA is an alternative and robust method for calculating housing need and this includes a local need figure, separated out from a figure where an uplift has been applied.</p>	Utilise the HEDNA local need figure.

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	<p>high (or low), a new MoU being needed, any figure needing to be a minimum, need to consider the impact of emerging new data sets, original figures being overestimated and SUEs not being needed, separate out the student population, the 2021 Census is not the answer to everything.</p>		
<p>Q6 Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider? [housing]</p>	<p><b>Context:</b> The three scenarios presented for the plan period 2021 were:</p> <ul style="list-style-type: none"> <li>the Government default standard method using 2014 population projections (63,760 dwellings / 3,188 pa)</li> <li>The HEDNA method using 2021 census data (39,280 or 1,964 pa)</li> <li>The HEDNA method with the 35% uplift removed (29,100, or 1,455 pa)</li> </ul> <p><b>Responses (29):</b> there were fewer responses to this question than the previous question which specifically focused upon the 35% uplift. There was a clear preference for using the HEDNA method (favoured by 10 out of 29 responses). There was little support for the highest figure (the use of the 2014 projections) with only a couple of developer responses preferring this. A couple of respondents felt all figures were too low, and some felt they were all too high but did not offer alternative methods. One respondent did propose an alternative way of calculating need, supported</p>	<p>The Council considers that the HEDNA method is robust and is an appropriate method upon which to base plan making, this has been further reinforced by an additional report for Coventry. It is considered that the Local Need figure is appropriate as it is assessed based on local data: the uplift is unevidenced and arbitrary and bears no relevance to local context.</p> <p>It is not considered appropriate for some of Birmingham's growth to be addressed as Coventry sits in a different Housing Market Area, as defined by the HEDNA in line with national planning guidance.</p>	<p>Proceed with option 3 (HEDNA local need with no uplift).</p>



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	<p>by substantial documentation. Another suggested that the sub regional market signals study should be used. A number of developers proposed that the plan should be accommodating some of Birmingham's growth.</p> <p>Some commented that by deleting the 35% uplift as an option, this was a departure from the standard method. A couple of respondents cited the need for a student demand study. Others advised that high growth was needed to help with delivering sufficient affordable housing. There were also comments on the need for infrastructure, and a need to focus more on the north of the city as there was already a lot of investment in the south.</p>	<p>Whilst in terms of monitoring housing numbers the Council is allowed to include PBSA (in line with government reporting methods) it is agreed that more evidence is needed on the student market, and this has been prepared.</p> <p>In terms of appropriate levels of growth and where this will be accommodated (and infrastructure needs in relation to this) this has been considered as part of further assessment work.</p>	
<p>Q7 Do you have any comments on the overall Employment Land Needs for Coventry?</p>	<p><b>Context:</b> The employment land needs were taken from the HEDNA, 8.5ha office, 147.6 ha general industrial excluding strategic B8, and 551 hectares strategic B8 (large scale warehousing /logistics) but across the Coventry and Warwickshire sub region.</p> <p><b>Responses</b> (29). These were almost evenly split between those who supported (10) and did not support (9) the HEDNA figures although many responses did not comment either way but instead offered a range of comments. Some respondents wanted more growth, some less, there was concern about economic imbalance</p>	<p>In terms of the reference to the wrong figures being used in table 4 (which lead to the conclusion of an oversupply) this is acknowledged to be the case and has been corrected.</p> <p>The issue of the emerging evidence on strategic employment (B8 and B2) has been considered.</p> <p>Updated evidence has informed revised figures including the West Midlands Strategic Employment</p>	<p>Figures updated in line with evidence.</p>

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	<p>with the ‘gig economy’, large sheds, aligning economic and housing growth, using / not using Green Belt, overestimating need due to hybrid working, not clear on what is being proposed. Some comments referred to the emerging regional evidence and wanted to see strategic B8 and strategic B2 addressed by the plan. It was also highlighted that the oversupply figures in table 4 are incorrect as they are sourced from Table 9.4 of the HEDNA which illustrated an option which the HEDNA dismissed.</p>	<p>Sites Study (WMSESS), the Coventry and Warwickshire WMSESS / HEDNA Alignment Report and the Coventry Employment Land Review and Office Market Addendum.</p>	
<b>Review of Policy DS2 (Duty to Co-operate)</b>			
<p>Q8 [Duty to Co-operate policy] Do you have any comments on our proposed amendments to Policy DS2?</p>	<p><b>Context:</b> The consultation proposal was to update the policy (e.g. to replace the now defunct LEP references with the WMCA, improve references to joint projects and monitoring).</p> <p><b>Responses (33).</b> The majority agreed with the updates, there was no disagreement. Some used the question to promote particular sites, or comment on procedural issues under the DtC such as producing an updated MoU. It was also commented that replacing the reference to the LEP with the WMCA needs consideration as the roles are very different.</p>	<p>It is agreed that the roles of the LEP and WMCA are very different so it is proposed that reference should be added in about ‘partnership working’ as this goes beyond the Duty to Co-operate bodies and provides future resilience in line with any changes which may occur.</p>	<p>Include a reference to partnership working in policy.</p>
<b>Review of Policy DS3 (Sustainable Development)</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q9 [Sustainable development policy] Do you have any comments on our proposals to update Policy DS3?	<p><b>Context:</b> The consultation proposed that the policy should continue to reflect the NPPF but could also now include reference the One Coventry Plan and Climate Change strategy.</p> <p><b>Responses</b> (15). The majority (13) supported the change, there were no objections. A few commented on the need to ensure the plan is viable, and the plan needs to provide more detail.</p>	The One Coventry Plan and Climate Change Strategy should be referenced in the policy.	As per the officer response.
<b>Review of Policy DS4 Part A (general masterplan principles), part B (Whitley) Part C (Keresley SUE) Part D (Eastern Green SUE)</b>			
Q10 [general masterplan principles] Do you have any comments on our proposed updates to Part A of policy DS4?	<p><b>Context:</b> The consultation suggested that Part A of DS4 (general masterplan principles) could strengthen references to design and cross reference to design policy.</p> <p><b>Responses</b> (18). A majority (11) supported the proposed changes, there were no objections. Some wanted flexibility as not all developments require a masterplan and design principles / references to layout plans etc were proposed as alternative options. Some felt these would sit more appropriately under the design policy and it was felt there might be duplication which could be confusing. Comments were also made on embedding net zero, energy efficiency, drainage strategies and other climate change measures and understanding what makes a community.</p>	Need to avoid duplication with other policy areas as this could be confusing. Design and climate change policies could be strengthened. AAP policies reviewed and pulled through to Local Plan.	Design and climate change policies strengthened . AAP policies reviewed and pulled through to Local Plan where relevant.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	Ensuring that existing masterplans (as referenced in the AAP) were pulled through to the main Local Plan eg CC24.		
Q11 Do you agree that we should make a minor change to B, C and D in terms of changing the references to use classes to reflect new legislation?	<p><b>Context:</b> The consultation proposed that DS4 (general masterplan principles) parts xi and xii should emphasise green infrastructure and biodiversity, and that the policy should also be updated to reflect national changes to the Use Classes Order.</p> <p><b>Responses</b> (15). There was clear support for the changes to reflect new legislation. A number of comments were made in relation to site specifics, the need for more emphasis upon green infrastructure, observations on mitigation, the need for accessible routes.</p>	Support noted. Comments noted however because many relate to specific sites and other matters these are picked up in the appropriate more detailed sections of the plan. Duplication of policy with other areas to be avoided as this is confusing.	Minor update to Use Classes references.
<b>Chapter 4: Jobs and Economy</b>			
Q12 Do you have any comments on our proposals to introduce a <b>new policy</b> which defines our definition of 'employment' for planning policy purposes?	<p><b>Context:</b> Given the changes to the national definition of employment uses (the deletion of Class B1 and the new Class E uses) it was proposed that a new policy should be introduced which clearly defines what is now meant by 'employment' for the application of local policy. For the purposes of employment supply and monitoring it is proposed this now relates to Class E Part g (I to iii) plus B2 and B8, and for decision making that this relates to Class E Part g (I to iii),</p>	Definition to the provided in explanatory text rather than policy. It is considered to be consistent with national policy but is needed in terms of clarification.	Definition to the provided in explanatory text.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>Classes B2, B8 and other uses serving an employment purpose. It was also suggested that in some instances there may be a need to remove permitted Development Rights to protect employment.</p> <p><b>Responses:</b> (20) – 11 agreed. Others commented that definitions should be consistent across the sub region, that there should be consistency for monitoring and decision making, ‘any other use’ is too vague, don’t try to change national policy, more work needs to be done on B8. Some questioned the potential removal of PD rights and what this would achieve. It was also questioned whether this needed a new policy or whether the redefined definition should be explanatory text (preamble).</p>		
<b>Review of Policy JE1: Overall Economy and Employment Strategy</b>			
<p>Q13: Do you have any comments on our proposals that Policy JE1 could be strengthened in line with our proposals?</p>	<p><b>Context:</b> The consultation proposed that the policy could be strengthened to reflect the One Coventry Plan and the Climate Change strategy including supporting Green Industry, sustainably located employment and more green infrastructure as part of new developments.</p> <p><b>Responses</b> (17). 16 respondents agreed with the proposals, no-one disagreed, one representation related to a site being promoted. Various comments were received about the need for sensitive design, being clear about the types of</p>	<p>The support is noted as are the comments. Clean, green and energy efficient developments are likely to encourage further investment in an area, but it appreciated that this is not a ‘one size fits all’ and policy updating has been carefully considered so that it is clear and deliverable.</p>	<p>Update policy in line with proposed changes to reflect the One Coventry Plan and the Climate Change</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>development covered, the need to apply sustainability criteria to all new development. Clarity was suggested on maximising roof spaces – reword to ‘maximise the proportion of roof space’ (for solar panels), improvements to green infrastructure to include canals, be more ambitious, maintenance of green space is proportionate, don’t be too onerous and discourage new investment, costings need to be considered.</p>		<p>strategy including supporting Green Industry, sustainably located employment and more green infrastructure as part of new developments.</p>
<p>Q14: Do you have any comments, or local evidence which might be helpful in assisting us develop standards for new employment sites?</p>	<p><b>Context:</b> This was a follow on to question 13, above, to see if there was any feedback on developing specific standards.</p> <p><b>Responses (8).</b> Responses were mixed, general comments on the nature of warehousing jobs, the need for employment and housing to be located close to each other / near sustainable transport, for travel plans to be maintained, to co locate employment sites where the uses have something in common and a suggestion to allocate central city industrial estate.</p>	<p>Comments are noted however no particular, specific new standards were proposed. Locational issues are considered in JE1, and the Employment Land Review considers the potential role of Central City.</p>	<p>No further change</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy JE2: Provision of Employment Land and Premises</b>			
Q15: Do you have any comments on the supply of employment land? [Policy JE2 – provision of employment land and premises]	<p><b>Context:</b> The question asked related to the growth figures provided by the HEDNA (see also Policy DS1) for employment needs and considered the Council's figures for allocated and non allocated sites, and supply vs need figures.</p> <p><b>Responses</b> (16). As also raised in the 'overall growth' section the figures relating to need and supply need correcting. The HEDNA does not include strategic B2. Several commented that there is a need to work with neighbouring authorities and that the MoU and SoCG need updating. Supply is being constrained by having only two sites over 10ha. Table 17 is oversimplified as supply figures are gross whilst HEDNA is net. Market signals evidence has not been taken account of. Some expressed concern that B8 uses provide low value jobs. Some employment sites need protecting as such. Net zero projects should be encouraged. Some commentators were promoting various sites. It was commented that some allocations do not yet have planning permission.</p>	The evidence base has been updated through the West Midlands Strategic Employment Sites Study, the HEDNA, and Alignment report (linking the aforementioned reports), an Employment Land Review and Office Market Addendum, and updated supply figures (HELAA).	Updated figures and allocations detail informed by evidence.
Q16: We are always keen to understand the employment land needs from local businesses	<b>Context:</b> This question was aimed at establishing whether there were any additional sites or opportunities for employment.	Assessment work undertaken to inform allocations.	Sites assessed to inform the review.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>and residents. Therefore, do you have:</p> <p>A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1</p> <p>B. A site you would like us to investigate? Please provide as much detail as you can</p> <p>C. Another suggestion or comment – please provide detail.</p>	<p><b>Responses</b> (10). A number of sites were proposed. Additionally, the matter of addressing strategic B8 was cited.</p>		
<p>Q17: Do you have any comments on our proposed changes to part 3 of Policy JE2?</p>	<p><b>Context:</b> This question related to Part 3 of policy JE2 which refers to the 58ha ‘rolling supply’. The Council proposed that this should be changed to reflect the emphasis in the NPPF to be clear on locational requirements and adapting to rapid change, and to focus upon the overall figure rather than a separate rolling supply.</p> <p><b>Responses</b> (5). Of these, 3 agreed, there was no disagreement, one respondent wanted a university policy which captures the growth agenda, and one was a general query about the Land Registry and the maps it provides.</p>	<p>Amend the policy to update it accordingly in line with the evidence base (Employment Land Review).</p> <p>In terms of the issue relating to the university this will be considered in the appropriate section. Existing policies are already considered to be sufficiently flexible to address universities’ ambitions. In terms of the Land Registry information can be found here:</p>	<p>Remove references to rolling supply and update in line with evidence base including update to allocations and including Key</p>



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		<a href="https://www.gov.uk/government/organisations/land-registry">https://www.gov.uk/government/organisations/land-registry</a> .	Employment Sites.
<b>Review of Policy JE3 Non-employment uses on employment land</b>			
Q18: Do you have any comments on our proposed changes to JE3 Part 1a?	<p><b>Context:</b> Policy JE3 relates to non employment uses on employment land. The consultation suggested that, given the Government changes to the definition of ‘employment’ the policy is now too restrictive and should now reflect a new local definition (see Q12). The consultation also proposed that marketing should not be required if a site is clearly not suitable for employment use in line with specific criteria.</p> <p><b>Responses</b> (13). 10 agreed with the changes, none disagreed. Some suggested that the ‘and’ could be changed to ‘or’, for consistency and the exception should be split into two separate exceptions (i.e. now 5 in total). In terms of marketing, it was proposed that clear guidelines are needed, stipulating the length of time for collecting and submitting evidence. The 2018 Market Signals Study was cited in terms of protecting allocations. Other comments received related to the need to protect employment land, not to leave sites derelict, to prioritise brownfield and to ensure high quality redevelopment.</p>	Definition of employment land to be provided in explanatory text to the employment chapter. Policy should be updated in line with recommendations of the Employment Land Review (2024). The ELR advises that the marketing guidance remains fit for purpose.	Update policy to take account of Employment Land Review including reference to how Key Employment Sites should be assessed.

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Q19: Do you have any other comments regarding policy JE3?	<p><b>Context:</b> This question offered the opportunity for further issues to be raised on policy JE3.</p> <p><b>Responses</b> (5). Some made comments on the need to focus on sustainability, some felt the need for more clarification and to repeat the definition of ‘employment’ in policy. Need to be explicit about which definition of ‘employment land’ is being used. Need to allow offices outside identified centres to be redeveloped for non employment uses without the need to comply with part 2 of the policy. If a site meets the tests in part 1a it shows it is unsuitable for employment so part 2 should not apply and the policy should be amended to reflect this.</p>	Comments noted: employment land definition to be included in explanatory text to the chapter. Office policy covered in JE4 however Part 2 of this policy is still considered to remain an important part of the assessment process for applications.	Changes to JE3 noted above.
<b>Review of Policy JE4 Location of Office Development</b>			
Q20: Do you have any comments on our suggestions for proposed changes to Policy JE4? [location of office development]	<p><b>Context:</b> Policy JE4 relates to the location of office development. The consultation proposed that the policy should be updated to reflect national use class order change, and to remove the reference to Impact Assessments as this is no longer part of national policy. It was also proposed to remove permitted development rights from major office developments, not to have to require offices to be close to primary routes on the highway network, and to change reference from ‘large scale’ to ‘major’.</p> <p><b>Responses</b> (12). Of those saying they agreed (5) it was commented that policies JE3 and JE4 need</p>	<p>Policy to be updated to reflect national change as proposed. In terms of location this would be applied in line with the centres-first approach of the NPPF and centre boundaries are identified through the retail policies of the plan.</p> <p>The evidence base (Employment Land Review Office Market Addendum) has now informed the approach to the review of office</p>	Introduce reference in policy title to type of office development to ensure flexibility in the market. Delete impact test.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>to be consistent, that centre locations need to be specified to understand the breadth of policy, that offices need more multi tenanted space, that the circular economy needs to be set out specifically, and that sustainability and green energy need to be included. Of those disagreeing (6), it was commented that requiring offices near sustainable transport modes could rule out key sites in the existing plan so these should be protected, that the road network can also encourage walking and cycling and electric vehicles, that the city should not be 'anti car', that new office space is not needed. One person offered a general comment about shifting policy to 'sustainable only' options.</p>	<p>policy. Flexibility of spaces to meet the needs of various tenants to be added in.</p> <p>Sustainable travel is addressed through the transport / accessibility chapter.</p> <p>Management of use classes would be controlled by condition if necessary.</p>	
<b>Review of Policy JE5 Location of R&amp;D, Industrial and Storage / Distribution Development</b>			
<p>Q21: Specifically in terms of general industrial, storage and distribution matters (not research and development which we consider separately), do you consider that the wording of policy JE5 is still up to date?</p>	<p><b>Context:</b> Policy JE5 currently focuses on Industrial and Storage, along with Research and Development. The consultation proposed that the policy is split given the differing needs of the sectors. In terms of Industrial and Storage the consultation suggested that the wording remained up to date and sought feedback on this view.</p> <p><b>Responses</b> (12). Of these, 5 agreed the policy is up to date in terms of the wording on Industrial and Storage. There was support for splitting JE5 into two policies. Some commented that the HEDNA was an appropriate basis for determining need and some stated that strategic B8 needs to</p>	<p>Proceed with splitting Policy JE5 into two separate policies. Quantum and location of B8 is considered in other sections of the plan review.</p>	<p>Split policy as proposed.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	be addressed. One commented that the M40 corridor is an appropriate location, one that there should be more emphasis on green energy and sustainability, and another felt that B8 creates little employment and generates traffic issues.		
Q22: In terms of research and development needs do you think the wording of Policy JE5 is still relevant, or do you think we need to recognise it as a separate issue? What evidence do you have which can help us better understand the needs of the sector?	<p><b>Context:</b> In terms of the element of policy JE5 which focuses on Research and Development the consultation proposed that the needs of the sector might not be met by current policy and requested more information on understanding locational and operational needs of the sector (including R&amp;D relating to universities).</p> <p><b>Responses</b> (7). As above it was agreed this should be a separate policy. It was felt that Research and Development required its own policy document, links to universities were supported and liaison with the universities was recommended, flexibility is needed (both in terms of repurposing existing facilities and in terms of supporting innovative research and start up business focusing on green technology).</p>	Split policy as proposed, and the Local Plan creates hooks to the Universities' masterplans to ensure their needs are taken account of.	Split policy as proposed.
Q23: Are there other sectors we should be considering in being able to support their specific needs? What are these needs, and do you have	<p><b>Context:</b> This question invited comment on other sectors.</p> <p><b>Responses</b> (2). The respondents cited the need for HGV parking and overnight facilities, electric charging and consolidation facilities for logistics and distribution, the manufacture of modular and</p>	Many of these issues are picked up in Coventry City Council's transport strategy and these are reflected in the transport policies section of the plan. HGV facilities to be included as part of the	Include HGV parking, overnight facilities, electric vehicle

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
any information and evidence which would help us understand and accommodate these?	energy efficient home offices, extensions to local health services, recognition that Coventry lies at the heart of the 'golden triangle' for logistics and distribution.	review of this policy. Manufacture of modular buildings would most likely be categorised as strategic B2 and this (along with strategic B8) is considered through the West Midlands Strategic Employment Sites Study and the Council is working with partners in Coventry and Warwickshire and beyond to address this. In terms of extensions to health services this is considered as part of the Infrastructure Delivery Plan (and in the context of supportive health policy).	charging and consolidation facilities.
<b>Review of Policy JE6 Tourism / Visitor Related Development</b>			
Q24: Do you have any comments on our suggestion that policy JE6 should treat tourism as a main town centre use?	<p><b>Context:</b> Policy JE6 relates to tourism / visitor related development. As the glossary to the NPPF categorises tourism development as a 'main town centre use' it was asked if Policy JE6 should be updated to reflect this.</p> <p><b>Responses (7).</b> Although there was broad agreement it was considered this was too simplistic as this could preclude important areas for tourism including the CBS Arena, Warwick University (including the Arts Centre), the canal basin, Charterhouse, and future potential uses</p>	Feedback noted, policy wording to ensure that such uses can be included (in line with Destination Coventry, the new Destination Management Organisation) subject to compatibility with other local plan policies.	Policy wording to ensure that such uses can be included subject to compatibility with other local plan policies and to support

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	linked to the green technologies industries and their potential educational role.		the aims and objectives of Destination Coventry.
Q25: Do you have any other comments or suggestions relating to tourism and Policy JE6, including evidence if this is applicable?	<p><b>Context:</b> This question supplemented Q24 above in case there were other comments people might have.</p> <p><b>Responses</b> (0). No comments received on this question.</p>	No comments received.	N/A
<b>Review of Policy JE7: Accessibility to Employment Opportunities</b>			
Q26: Do you have any comments on our view that this policy [JE7] remains up to date?	<p><b>Context:</b> Policy JE7 relates to accessibility to employment opportunities. The consultation suggested that the policy was up to date although the reference to CIL should be replaced by the more flexible reference to ‘developer contributions.’</p> <p><b>Responses</b> (4). It was agreed the reference to CIL should be changed as proposed. Comments were received on the need for maintaining public transport, suggested text to read ‘especially those living in Coventry’s most deprived areas and communities’ and one respondent wanted to see developer contributions limited to transport infrastructure (in relation to the reference to ‘accessibility’).</p>	The comments are noted. However, it is considered that the current policy already references those in the more deprived parts of the city. Limiting contributions to transport only would not give sufficient flexibility to enable the policy to respond to contextual issues and circumstances.	Minor change to replace CIL reference with ‘developer contributions’.
<b>Chapter 5: Housing</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy H1 Housing Land Requirements</b>			
<p>Q27: Do you have any suggestions which can help us meet our housing need within our area?</p> <p>A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1</p> <p>B. An area you think could be densified while still achieving a high standard of living? Please provide as much detail as you can</p> <p>C. A site you would like us to investigate to see if it might be suitable for housing? Please provide as much detail as you can</p> <p>D. Another suggestion or comment – please provide detail</p>	<p><b>Context:</b> This question related to the review of Policy H1: Housing Land requirements. It links to the level of growth question (see Q5 and Q6 in the review of Policy DS1) but this policy specifically relates to how an appropriate level of growth might be delivered. The question therefore invited site submissions (call for sites), ideas for densification, ideas for sites which might come forward or other comments.</p> <p><b>Responses</b> (34). Through the consultation the following sites were submitted proposing development:</p> <ul style="list-style-type: none"> <li>• 20 brownfield</li> <li>• 3 greenfield</li> <li>• 1 on Local Green Space</li> <li>• 26 Green Belt</li> <li>• 2 for the safeguarded sites</li> </ul> <p>In terms of the densification aspect ‘gentle densification’ was felt to be appropriate to the edges of the ring road, around transport hubs and in relation to City Centre South.</p> <p>In relation to other suggestions, comments were general and reflected people’s views on whether Green Belt should or should not be used, varying views on PBSA including locational needs (close</p>	<p>A further call for brownfield sites was launched to run from 27/11/2023 to 22/01/2024.</p> <p>Assessment work and policy direction have informed proposed allocations.</p> <p>Densification has been considered and the new Density Study has shaped the plan review in terms of new opportunities.</p> <p>PBSA and other housing needs are considered later in this chapter.</p> <p>Comments on Biodiversity and brownfield are noted, and this is addressed through Biodiversity Net Gain.</p>	<p>Include new allocations in plan.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	to campus), housing needs of various groups, comments on various levels of growth. Some expressed concern over the need to be careful with densification and the need to incorporate open space and that some brownfield sites may have high biodiversity value.		
<b>Review of Policy H2 Housing Allocations</b>			
Q28: Do you have any comments on the review of Policy H2 (Housing Allocations)?	<p><b>Context:</b> Adopted Policy H2 includes a table of sites which were allocated in the adopted Local Plan, along with an update on the current status of these. Comments were invited.</p> <p><b>Responses</b> (150). The majority of responses to this question (130) wanted land at Browns Lane removed from the allocations. Removal was requested for a range of other allocated sites including the SUEs and the area around Kingshill.</p> <p>Other responses confirmed commitment to delivering allocated sites including Walsgrave Hill Farm and Sandy Lane (the latter proposing increased capacity), and there was a request to allocate part of the Kersley SUE for further housing.</p> <p>Other comments were more general relating to net zero, viability, the need to ensure allocations are delivered before allocating new sites, views</p>	<p>The objections to the Browns Lane site were made at the time this was being considered at planning committee so that was the appropriate arena for considering those views.</p> <p>In terms of the status of the other allocations, the submissions through Call for Sites have been assessed and new allocations are being proposed.</p> <p>In terms of the more general comments these will be addressed through the review of the relevant policy areas.</p>	Updated and new housing allocations included.



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	on the Green Belt and appropriate levels and location of growth.		
<b>Review of Policy H3 Provision of New Housing</b>			
Q29: Do you have any comments, including supporting evidence which can help us address introducing standards which can help us proactively address climate change in terms of residential development?	<p><b>Context:</b> This question related to whether or not new standards could be introduced</p> <p><b>Responses</b> (33). Responses varied. Generally, responses from the development industry commented that standards were already set by Building Regulations (including incoming further regulations), and there were concerns about viability. Some also commented that in covering standards in this chapter / policy there would be confusion / duplication as the issue is also being addressed through the environmental management chapter.</p> <p>Several respondents made comments about the need to address climate change and net zero providing examples e.g. insulation, energy, water technology.</p>	The issue over duplication with other policies is acknowledged and so this will be addressed through the review of the policies in the Environmental Management chapter.	Address through the EM policies section.
Q30: Do you have any comments on our proposals for introducing new policy on amenity?	<b>Context:</b> The question sought to gauge views on strengthening references to 'amenity', and whether Building for a Healthy Life principles should be utilised.	The policy context has been reviewed as 'amenity' could be interpreted in different ways. The points about liveable neighbourhoods (or similar) are noted and it is important to	Policy amended to include new standards for design, access to

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p><b>Responses</b> (19). Some respondents questioned whether this was the right place for such a policy suggesting that the residential design guide was more appropriate. There was a proposal that ‘sustainable neighbourhood standards’ or ‘liveable neighbourhoods’ might be a better term than ‘amenity’ and there were several suggestions as to what this might mean in practice including housing types, streetscape, green and blue infrastructure. Comment was also made on what this might mean for employment sites e.g. mix of employment, landscape buffers, lighting etc. (examples were provided of sites considered to have been well designed in this context). There was a suggestion that the views of Age UK and Disability Rights should be sought.</p>	<p>ensure that these concepts are incorporated into the most appropriate parts of the plan. Ensuring that broad engagement is achieved as policies are formulated is noted and participation has actively been encouraged from a range of organisations representing different sections of the community in Coventry.</p>	<p>open space, services and facilities, for all ages and abilities and to link to the Council’s design guide SPDs.</p>
<p>Q31: Do you think we should require development to demonstrate how it has taken the Building for Healthy Life Principles into account?</p>	<p><b>Context:</b> This follows on from Q30, the question sought further elaboration. <b>Responses</b> (16). Views varied – 7 respondents were clearly in favour with the comment that reference should also be made to the Town and Country Planning Association’s work on planning and healthy place-making. 5 respondents objected, most stating a requirement to comply would be too onerous. Others offered a range of views, some felt that undertaking a full assessment would be inappropriate, a number felt these should be used as best practice guidance</p>	<p>Comments noted and agreed there is some potential duplication with other areas of the plan so it’s better to link to the Health and Design Guide SPDs. The Council is also developing Design Codes.</p>	<p>Strengthen links to Council’s SPDs (Residential design guide, householder design guide and Health).</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	rather than a requirement. Others thought that the principles could cause confusion or issues of clarity when applying. It was commented that design codes could be used instead to set parameters. It was also commented that these should link to the health policies and Health Impact Assessment.		
Q32: Do you have any comments on our proposals to adopt the National Described Space standards (NDSS)?	<p><b>Context:</b> This question sought to seek feedback on the Council's stated intentions to adopt the NDSS</p> <p><b>Responses</b> (25). There was clear support for this (15 responses) although some caveated their support by saying there may be occasions where greater flexibility is needed. 4 representors objected outright to the proposals, citing lack of evidence, impact on viability, would reduce density and may well be dealt with by Government through the new Development Management policies. Several made more general comments / expressed concerns such as the need for viability testing and evidence, that the council should focus on good design instead, the impact upon affordability and choice, the different budgets and aspirations and, if implemented the need to have transitional arrangements.</p>	Further reports produced after this consultation on Density and Viability have factored in NDSS compliance and the plan is deliverable taking these standards into account. Minimum space standards are essential to ensure quality of life.	Policies to include compliance with NDSS.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q33: Do you have any comments on our proposals to introduce specific policy which supports Build to Rent (BTR) in Coventry?	<p><b>Context:</b> Built to Rent is a model which has been gaining traction nationally since the plan was adopted so a potential policy was explored.</p> <p><b>Responses</b> (16). There was overall support for this policy in principle with comments generally relating to how this might be implemented. The main comments were in regard to viability and evidence and the level and nature of the affordable housing element and how this would be managed and delivered. One comment advised that BTR tends to have a different size mix to other developments (e.g. studios). The need for accommodation on a short term let was mentioned in relation to university needs e.g. for visiting staff. While there was support for this providing a good accommodation option for young people it could also help those on low incomes, or older people too. The need for energy efficient buildings was commented on.</p>	The comments regarding viability and the needs of the sector have been included in the viability evidence base (produced after Regulation 18) and specific policy is to be developed.	Include a policy on Build to Rent.
Q34: Do you have any comments on our suggestion to introduce specific policy which supports Co-Living in Coventry?	<p><b>Context:</b> Co-living is a newly emerging housing model, and some draft policy wording was consulted on.</p> <p><b>Responses</b> (19). The majority of comments (12) expressed support in principle although many caveated this, citing the need for more evidence including information on viability, the importance</p>	<p>Post Regulation 18, further work undertaken through viability report and examples of co-living also researched to help define and guide policy.</p> <p>The reference to the low graduate retention rate in the city comes</p>	New policy on co-living to be included in the plan.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>of not confusing this with ‘co-housing’ and being clear on definitions, the need to be flexible on affordable housing contributions, not to over- rely on it as it would impact on the delivery of other types of accommodation, the need for energy efficiency, the need to widen the target groups of potential residents and the importance of not over-densifying.</p> <p>Some respondents did not support the potential new policy feeling this would enable more PBSA, not being convinced graduates would want to stay (and, conversely concerns about the reference in the consultation text to a low graduate retention rate) , concerns how such developments would be managed and run, concerns about climate change and the ‘heat island effect’ resulting from living in small spaces, and potential ‘oversupply’ of small homes when people need family homes and gardens.</p>	<p>from the HEDNA but it is accepted that other groups of people may also benefit from more choice of accommodation. Comments about family accommodation are noted but this is about the need to strike a balance to meet identified need (see HEDNA).</p> <p>Comments regarding energy are addressed in the section on energy.</p>	
<p>Q35: Do you have any comments on whether we should set a limit on how much co-living we should allow so that we are able to review its impact over time given that it is an emerging model? If you think we</p>	<p><b>Context:</b> this followed on from Q34 and was based upon a suggestion in the HEDNA that a limit could be explored</p> <p><b>Responses (9).</b> A number of comments advised that a limit was pointless as there is little / no co-living in the city at this point, that the markets would limit through supply and demand, monitoring and review is the most appropriate</p>	<p>There appears to be no justification for a limit to be set. No sites have been put forward specifically for an allocation for this use. As this is a newly emerging market the situation will be monitored.</p>	<p>New co-living policy to be monitored but no specific limits of quantum of</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
should, what should the limit be, and what evidence could we use to provide robust and fair justification?	approach. Other expressed concern over community cohesion, especially where tenancies were short term and the impact upon neighbourhoods and the health of the residents themselves. One respondent felt that a site or sites could be allocated to de-risk the process. An SPD was also proposed.		co living proposed.
Q36: Do you have any comments on our proposal to introduce a policy on Custom and Self Build Housing?	<p><b>Context:</b> currently Custom and Self Build Housing does not have a specific policy but is addressed in wider housing policy.</p> <p><b>Responses</b> (19): there was some support for the principle of this (10 responses) as respondents felt the Council should be proactive and the HEDNA identifies a need. In terms of the content of such a policy there was no clear consensus with some feeling this should be criteria based, others suggesting there should be plots as parts of wider development and others disagreeing with that approach (impacts on viability and deliverability logistics). Some did not feel a policy was necessary as the demand is low and ‘niche’ and in any case should be considered through the planning application process. Others made more general comments: people can be added to multiple Custom and Self Build registers so they do not reflect true need, people prefer sites in the countryside, if allocated as part of large sites there should be a fallback mechanism if not developed within a specific timeframe.</p>	Given that Policy H3 already includes supportive policy on Custom and Self Build Housing it is felt that this is sufficiently proactive as the assessment criteria for planning applications would be the same.	Retain in H3.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q37: We propose to delete the part of Policy H3 which supports limited infill [for self and custom build housing] in the Green Belt as this is contrary to national Green Belt policy. Do you have any comments on this?</p>	<p><b>Context:</b> currently, Policy H3 supports limited infill for self and custom build housing.</p> <p><b>Responses</b> (12). The majority of responses (9) supported the deletion of this part of Policy H3. It was commented that in the NPPF the exception relates to villages. A couple of respondents objected to the proposed removal of the text saying that this would prevent windfall contributing to the housing supply and there needs to be some greenfield to address the aspirations of self builders. One respondent felt that rural exception sites were needed to support the rural parts of Coventry.</p>	<p>The overall support for the deletion of the reference to infill is noted and will be taken forward. In terms of the objections the numbers would be small and would not significantly contribute to overall housing supply, and in terms of ‘aspirations’ this does not preclude a case being made in terms of greenfield which would be considered on its own merits through the planning application process. In terms of rural exception sites it is not considered these apply to the context of Coventry city council’s administrative area.</p>	<p>Delete reference to limited infill.</p>
<p>Q38: Do you think we should allocate a brownfield site (s) specifically for self and custom house building? If yes, how might we ensure such a site can be delivered?</p>	<p><b>Context:</b> this question was to explore whether the council could be more proactive in supporting self and custom build housing.</p> <p><b>Responses</b> (9). Most respondents (6) felt this was a good idea, citing examples (Cherwell, parts of the Netherlands) and saying that the council should use its enabling powers to deliver. Three respondents opposed the suggestion stating that market forces would deliver, and asking whether the council had ever been asked the question before and whether it was an issue at all</p>	<p>Government requires the council to be proactive in supporting self and custom build housing however demand is not considered to be such that there is a need to allocate a specific site for self and custom build and it is preferable to let the market deliver as the principle is supported in Policy H3.</p>	<p>No change.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q39: Do you have any comments on the inclusion of support for Community-Led Housing in this proposed new policy?	<p><b>Context:</b> this question was asked to see if Community led housing should receive specific support.</p> <p><b>Responses</b> (6). All respondents supported this. Further comment was made in terms of a possible need to review the Affordable housing SPD, more information on delivery and viability, and the need for high build standards.</p>	Support noted. Include in policy H3.	Include in Policy H3.
<b>Review of Policy H4: Securing a Mix of Housing</b>			
Q40: Do you have any comments on our proposed minor revisions to Policy H4 (securing a mix of housing)?	<p><b>Context:</b> Views were sought on a minor change which updated the reference to the Strategic Housing Market Assessment (SHMA) with the more up to date Housing and Economic Development Needs Assessment (HEDNA)</p> <p><b>Responses</b> (16). The majority supported this (12) there were no objections. Some chose to comment more broadly on the application of the HEDNA.</p>	<p>Change the reference from SHMA to HEDNA. Take account of the other comments in relation to the relevant policy areas of the plan.</p> <p>Comments on the application of the HEDNA are covered elsewhere in the plan review.</p>	Change the reference from SHMA to HEDNA.
<b>Review of Policy H5: Managing Existing Housing Stock</b>			
Q41: Do you have any comments on the review of Policy H5 Managing Existing Housing Stock?	<p><b>Context:</b> The consultation sought views on strengthening the policy to include reference to energy efficiency.</p> <p><b>Responses</b> (12) Responses varied, some felt it was appropriate to reference energy efficiency here whilst others felt this was unnecessary as it would duplicate other areas of the plan. Some made broader comments about the need for more</p>	Issues regarding duplication are agreed. Issues relating to energy efficiency and net zero are considered in the Environmental Management (EM) policies section of the plan.	Inclined to agree on the duplication issue – to discuss internally.



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	housing, the potential application of a cost / benefit approach, set a high bar for demolition and rebuild, widen references to sustainable neighbourhoods and net zero and energy efficiency.		
<b>Review of Policy H6: Affordable Housing</b>			
<p>Q42: We propose that the policy should be updated to reflect the Council's preference for Social Rent as opposed to Affordable Rent. Do you agree</p> <p>A. Yes – please comment further if you wish</p> <p>B. No – please explain</p>	<p><b>Context:</b> affordable housing and the nature of its delivery is defined in the NPPF however there is still some local flexibility which was explored here.</p> <p><b>Responses</b> (25). 9 stated that they agreed, citing concerns that other models were unaffordable despite the definition. 2 disagreed, stating that the need will vary over the plan period and a rigid policy will not enable evolving demand to be met. The majority of responses (16) made a variety of points, some asking where the evidence and justification is for this, the HEDNA should determine mix of tenures, there is a need for flexibility, more homes are needed to deliver sufficient affordable housing, there is a need to provide housing for key workers as set out in a study by PWC (July 2019).</p>	<p>Further work after the Regulation 18 consultation undertaken regarding viability has informed the review of the policy to express the preference for social rent.</p>	<p>Add in preference for social rent.</p>
<p>Q43: Do you have any comments on our proposals regarding affordable home ownership? What</p>	<p><b>Context:</b> This question was asked because the council believes that affordable home ownership should be affordable with the principle that it is intended for those who cannot meet their need through the open market so it is considering how</p>	<p>Further work after the Regulation 18 consultation undertaken with housing team and regarding viability has informed the review of the policy.</p>	<p>Policy wording updated including reference to</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
evidence do you think we should use?	<p>this is achieved, how maximum income levels are set, and maximum property prices for affordable ownership products.</p> <p><b>Responses</b> (18). A range of responses were made: some were generic comments about the need to comply with national policy and guidance, supporting the principle of affordable home ownership and that affordable homes should remain as such and should be of good quality. In terms of evidence, it was suggested that the policy should be based on a threshold level for purchase which should be re-assessed annually to reflect house prices and income patterns. It was proposed that the approach should be defined on the basis of the housing waiting list, prevailing market price and average household income. That definitions should be included as per the approach taken in The London Plan. That local criteria for First Homes should be provided. It was suggested that evidence could come from Shelter and affordable housing providers. That Discount Market Sale should be used. That the policy wording should reflect the needs of Build to Rent which should be Affordable Rent rather than social rent. That a range of sizes of property should be available for Affordable home ownership so people do not become trapped in small homes that do not meet changing needs.</p>		an updated Affordable Housing SPD.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q44: Do you have any other comments on the review of Policy H6 Affordable Housing including issues and evidence relating to viability which we need to consider	<p><b>Context:</b> this question was asked in order to gauge whether there were other issues not already addressed, including viability.</p> <p><b>Responses</b> (12). Most comments were of a general nature citing the need for viability work, too many constraints rendering sites unviable, comments on the scale and nature of affordable need. Comments were made on older persons' housing and that this should be assessed in the viability work, focusing on a report by Three Dragons (May 2013 – briefing note on viability prepared for Retirement Housing Group).</p>	The issues cited have been explored through the viability assessment and have been used to shape policy.	The viability evidence has been used to shape the updated policy.
<b>Review of Policy H7: Gypsy and Traveller Accommodation</b>			
Q45: Do you have any comments on our review of Policy H7, Gypsy and Traveller Accommodation?	<p><b>Context:</b> The consultation explained that a new Gypsy and Traveller Accommodation Assessment was completed in February 2023 which identified a shortfall of 6 pitches which could potentially be accommodated. In terms of transit arrangements the evidence recommended planning for transit sites / negotiated stopping points. Views were sought on this.</p> <p><b>Responses</b> (7). Views varied, with the majority focusing upon transit need with some feeling temporary pitches are needed with others supporting negotiated stopping. Other made more general comments about provision of good accommodation and the need for good management.</p>	In terms of standards and the provision of pitches the policy should provide supportive wording which addresses the recommendations of the GTAA. This provides flexibility to support provision over the plan period.	Policy to be updated to include standards and wording which supports the recommendations of the GTAA.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation</b>			
<p>Q46: Do you have any comments on the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards)? Please provide evidence to support your views</p>	<p><b>Context:</b> these are optional standards which go beyond standard building regulations, but which could be added to policy if appropriately evidenced.</p> <p><b>Responses</b> (26). Comments varied with some feeling this should be supported but others stating there is no evidence (or evidence is required if the council wishes to pursue introducing additional standards). Some comments suggested that this should apply equally to market and affordable homes, that this is not just an ‘older persons’ issue, that adjustments need to be focused on existing properties, that all care homes and older persons accommodation should comply with these standards and should include disabled parking, that viability testing is needed, that adapted housing does not provide onsite support, care and companionship, that wheelchair users should not be assumed to be elderly and dealt with under a housing for older people ‘tag’. Should use the Three Dragons 2013 report produced for the Retirement Housing Group. One commented that it is not clear how the HEDNA has taken into account the needs of the over-85s</p>	<p>The comments were noted, and the viability report was requested to assess the potential for introducing these standards. The breadth of the policy has been widened to ensure that its clearer a range of specialist uses are included.</p>	<p>Update policy in line with evidence.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q47: Do you have any other comments on our review of Policy H8?	<p><b>Context:</b> The question was based around potential locational requirements, building for a Healthy Life criteria, different use classes, affordable housing contributions and viability. Comments were invited to encourage as much feedback as possible in this evolving sector.</p> <p><b>Responses (8).</b> Responses were varied, some felt flexibility was key with policy encouraging specialist accommodation (including new models which might emerge over the plan period) while others felt a criteria based policy was more suitable. Viability testing was cited as was the needed for sustainable neighbourhoods and for high standards of energy efficiency.</p>	Comments are noted. Policy to be expanded to take more account of the needs of the sector and to ensure flexibility.	Policy expanded.
<b>Review of Policy H9: Residential Density</b>			
Q48: Do you consider: A. The policy is up to date and sets sufficient standards to maximise capacity already B. The policy could be amended to increase minimum density levels in certain locations outside the ring road? (please explain and provide evidence where applicable)	<p><b>Context:</b> Policy H9 currently sets minimum density standards of 35 dwellings per hectare (dph) outside the ring road and 200dph within it. The question sought to gauge views on increased opportunities for densification.</p> <p><b>Responses (21).</b> Responses were split between those who felt the policy is up to date and those who felt it should be updated. Some felt some areas outside the ring road (but still 'city centre') were appropriate for densification whereas other commented that they thought the current figure of 200dph was already too high. It was commented that there needs to be flexibility as sometimes</p>	Density work has since been undertaken to assess what might be realistic and deliverable in various locations, to inform site assessment and capacity work and to inform policy revision.	Update to reflect the evidence (Density Study).

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	other factors impact on being able to deliver a minimum. Some felt care needed to be taken to ensure housing needs are met e.g. homes for families.		
<b>Review of Policy H10: Student Accommodation</b>			
Q49: Do you have any comments on our review of Policy H10?	<p><b>Context:</b> Policy H10 actively supports Purpose Built Student Accommodation (PBSA). The consultation proposed a more nuanced approach where applications were considered on their merits and in line with revised assessment criteria.</p> <p><b>Responses</b> (18). Responses were mixed, many supported the principle of updating policy but for different reasons. Some felt that there was too much PBSA (some suggested a moratorium until need was better understood) and others felt PBSA should be supported as it means less demand for HMOs. Comment was made that PBSA should be assessed separately to housing need. If a needs assessment is introduced to accompany planning applications, this should be made clear at the outset. There was support for assessing applications on their merits. Many comments focused upon the criteria, feeling that ‘directly accessible’ needs clarification. The proposed reference to ‘15 minutes walk time’ was considered impractical, limiting possibilities and may prevent development in sustainable locations accessible by public transport. It was commented</p>	<p>Student Accommodation study commissioned and completed to inform the review of policy.</p> <p>PBSA has been monitored and has not impacted on HMOs which address a wider variety of accommodation needs as can be seen through the new HMO Development Plan Document.</p>	New PBSA policy.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	that a 'university quarter' boundary should be established.		
Q50: Do you have any comments on a 'monitor and manage' approach, including how this could be implemented, or any alternative ways of managing delivery which can be supported by robust evidence?	<p><b>Context:</b> Following on from Q49, a 'monitor and manage' approach was suggested to recognise the universities' growth plans, whilst delivering a balanced housing market. Views were sought on this.</p> <p><b>Responses:</b> (6). Comments varied. Some supported the approach whereas others felt there was already too much, growth should be stopped and other housing should be prioritised. It was also commented that the universities were preparing design guides which could assist with this approach.</p>	The details of a monitor and manage approach are being explored currently in the light of the aforementioned PBSA evidence base.	
Q51: Do you have any examples of policy or evidence which would help us develop a policy relating to standards for student accommodation, to include matters of design, amenity, sustainability and mechanisms to ensure that it is truly inclusive for students from all	<p><b>Context:</b> This question was asked to assist with developing robust policy which would ensure PBSA meets the needs of its intended residents, delivers safe and sustainable communities and is well designed.</p> <p><b>Responses</b> (7). A number of comments were made which referenced the ANUK and UK Code of Practice, Residence Life Programmes and management practices, and universities offered further discussion. Other comments were made in terms of Building for a Healthy Life standards and the need to address climate change, net zero and</p>	The PBSA evidence base has been used to inform development of standards for PBSA and it is intended that these would be expanded further through an SPD.	New PBSA policy to address these issues at a high level with commitment to developing an SPD to provide further

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
backgrounds including the potential need for developer contributions to secure affordable tenures?	student wellbeing. The need for viability assessment was also cited.		detailed guidance.
Q51: Do you have any other issues you think we should be taking into account when planning for student housing?	<p><b>Context:</b> This question was asked to invite wider comment on issues not already covered.</p> <p><b>Responses:</b> (8) Several points were made, some of which duplicated those submitted against earlier questions including the need to engage with universities, comments on too much PBSA, the need to be flexible, for good design, addressing climate change etc. Locational issues were also flagged, the need to help students with dependents, affordability, the need to ensure students staying in the city after graduating can find suitable accommodation, and suggestions for potential PBSA allocations.</p>	As mentioned above the council has commissioned further evidence to understand the needs of the sector and the issues raised will be considered.	
<b>Review of Policy H11: Homes in Multiple Occupation (HMOs)</b>			
Q53: Do you have any comments on our proposal to delete Policy H11 and instead make sure the Local Plan cross references to the HMO Development Plan document?	<p><b>Context:</b> Views were sought on whether this policy should still be retained given that a separate HMO DPD is being produced.</p> <p><b>Responses:</b> (7). Responses varied, some were general comments about HMOs. Generally, there was support for the approach, it was felt that there should be flexibility so that documents can be cross referenced.</p>	Further to the HMO DPD examination this policy needs to be retained to provide a policy link to the new DPD as it supplements the Local Plan.	Update policy H11 to provide the link to the new HMO DPD.



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Chapter 6 Retail and Centres</b>			
<b>Overarching questions</b>			
Q54: Do you have any comments on our view that removing references to use classes and using the terminology of Convenience, Comparison and Service is appropriate?	<p><b>Context:</b> This was an overarching question (rather than relating to one specific policy) given the changes to national retail policy and use classes and increased flexibility around Permitted Development.</p> <p><b>Responses (7).</b> Responses were divided with 4 in agreement and 3 disagreeing. Those who disagreed felt the terminology was too prescriptive, centres need to evolve, and terminology needs to follow the NPPF. One comment was received in relation to fuel stations and Electric Vehicle charging with the respondent stating they should not have to meet the sequential test.</p>	The comments have been considered through the retail evidence base and policy has been revised in accordance with this report which updates policy terminology and allocations.	Update policy in line with the Retail and Centres Study 2024.
Q55: We think that references to floorspace figures should be removed to enable a more organic approach to retail development within the defined centres. Do you have any comments on this?	<p><b>Context:</b> This question was asked to gauge views on how planning policy can be more flexible to adapt and respond to the rapidly changing needs of the sector.</p> <p><b>Responses (5).</b> There was general agreement with the proposal to remove floorspace figures although it was also commented that SUEs need retail space protecting, and floorspace loss needs to be monitored.</p>	Update policy in line with the Retail and Centres Study 2024 which protects a revised level of floorspace in the SUEs (Strategic Urban Extensions) but does not set quantum elsewhere.	Update policy R1 in accordance with the Retail Study evidence.

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<b>Review of Policy R1: Delivering Retail Growth</b>			
Q56: Do you think the centres listed in this policy remain fit for purpose and should be retained as allocations within this policy?	<p><b>Context:</b> This question related to the current hierarchy of centres querying whether this still remains applicable.</p> <p><b>Responses</b> (2). There was agreement. Respondents also felt retail should be focused on the city centre, targets should be aspirational and mixed use should be supported where it supports regeneration.</p>	Update policy in line with the Retail and Centres Study 2024 which makes some minor changes to the centres hierarchy.	Update policy R1 in accordance with the Retail Study evidence.
Q57: Do you have any comments on a potential change to policy wording to include tourism in relation to the Arena Park Major District Centre?	<p><b>Context:</b> This question was asked as it is considered that the area is a key tourist attraction, and this could be recognised in policy.</p> <p><b>Responses</b> (2). There was agreement with the proposed change. One comment was made that other developments in the vicinity should not have to consider functions of the district centre when applying sequential assessment and that further guidance may be needed on the impact test or how the proposal would be considered an essential element of supporting wider 'tourism'.</p>	The retail evidence base considered the issues raised, reference to tourism retained.	Retail evidence clarifies this position.
<b>Review of Policy R2: Coventry City Centre – development strategy</b>			
Q58: Do you have any comments on the insertion of a reference to limit the disproportionate concentration of sui	<p><b>Context:</b> Sui-generis uses mean those which do not fit into a defined 'use class', and the question sought views on whether such uses should be limited in the centre.</p> <p><b>Responses</b> (8). Of these, 2 supported and 4 objected. It was commented that some sui</p>	The retail evidence base considered the issues raised and the context of retail in the light of national policy. No specific comment in retail study, other than the national use class order	None on this issue.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
generis uses within frontages?	generis uses contribute to vibrant town centres / footfall, that the vacancy rate could increase, would need to define where restrictions apply as should be focusing on retail frontages and corridors, each case should be considered on its merits. A couple of commentators made more general observations feeling it was a minor issue.	and the fact that every SUI use requires an application, and therefore applies the relevant assessment and associated controls on development. Also notes that some SUI uses are beneficial in centres. In terms of gambling uses, national picture shows a decline in high street establishments due to online presence.	
<b>Review of Policy R3: the Network of Centres</b>			
Q59: Do you have any comments on the proposed changes to the above paragraph?	<p><b>Context:</b> The ‘above paragraph’ referred to in the question proposed to amend the final paragraph of part five of the policy (Local Centres) to read: ‘day to day convenience shopping and proportionate main town centre uses.’ This reflects the fact they are local centres and often are of a small scale and serve a local role in the community.</p> <p><b>Responses</b> (3). One agreed, one disagreed and it was commented that centres need to be well served by public transport and should have accessibility criteria.</p>	Retail study states that the hierarchy of centres should stay the same but that there should be some minor boundary changes and the removal of Sutton Avenue due to its localised location and accessibility.	Minor boundary changes as shown in the study.
Q60: With the above in mind, do you have any comments on whether	<b>Context:</b> In this question, the ‘above’ refers to ‘as part of ongoing work with our consultants we will be re-visiting the hierarchy of centres and	The Retail and Centres Study 2024 proposes some minor changes to the hierarchy and	Update policy in line

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the centres listed in this chapter of the Local Plan remain fit for purpose, or should changes to the hierarchy and/or defined centres be made?	considering if the centres currently defined in the Local Plan remain fit for purpose.’ <b>Responses</b> (2). One felt changes could be made, one did not want to see hierarches and one requested the Gallagher retail park should be allocated as a District Centre.	policy should be revised to reflect these.	with evidence.
<b>Review of Policy R4: Out of Centre Proposals</b>			
Q61: Do you have any comments on whether part one of Policy R4 should include reference to hot food takeaways?	<b>Context:</b> The proposal was that part one of the policy be amended to read: <i>Proposals for retail, Main Town Centre uses and <b>hot food takeaways</b> (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</i> <b>Responses</b> (6). 5 supported this. One person stated there was no evidence to support this, that hot food takeaways will not undermine the role and function of town centres and policy R4 follows Government policy regarding the sequential test.	Retail evidence (2024) is very clear about definitions within the NPPF. Hot Food Takeaways are not considered as being main town centre uses. Therefore, they are not subject to the sequential and impact test, as they cannot be considered sequentially preferable.	None for this issue.
Q62: Do you have any comments on the creation of primary shopping areas in the	<b>Context:</b> This question was based on bringing local policy up to date with national policy. <b>Responses</b> (2). Both supported the proposals.	The retail evidence base has set out Primary Shopping Areas which will be reflected in Policy R4.	Update Policy R4 to define Primary

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City Centre, Major District and District Centres?			Shopping Areas.
Q63: Do you agree with our suggestion that due to their scale, Local Centres should not have primary shopping areas defined and should use the centre boundary for all elements of sequential assessment?	<b>Context:</b> this was asked to explore the evolving context of the sector. <b>Responses</b> (2). Both supported the proposals.	This has been confirmed by the retail evidence base (2024) which recommends this approach.	No primary shopping areas for Local Centres.
<b>Review of Policy R5: Retail Frontages and Ground Floor Units in Defined Centres</b>			
Q64: Do you agree with our suggestion that this policy (Policy R5: Retail Frontages and Ground Floor Units in defined centres) should be deleted?	<b>Context:</b> This question was asked as, given the use classes order has changed significantly, it was considered this policy may no longer be necessary, especially in light of the broad spectrum of uses which can occupy an E class unit without needing planning permission. <b>Responses</b> (1). The respondent agreed and suggested this should also be applied to the Area Action Plan policy CC22.	Given further consideration in the light of the retail evidence base (2024) the policy needs to be retained and updated to reflect the new Use Classes and the defined centres and include the new Design Guidance for shopfronts to help ensure shopping areas are attractive, vital and viable.	Retain policy R5. Update to reflect use classes A-E and include reference to shopfront design SPD.
<b>Review of Policy R6: Restaurants, Bars and Hot Food Takeaways</b>			
Q65: Do you agree with our proposals for the deletion of 'normally' and	<b>Context:</b> The current use of the term 'normally' in adopted policy can be ambiguous, ('Hot food takeaways often attract considerable customer	Reference to the adopted SPD should be added in for clarification but otherwise policy	Update to include

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
to add in 'adopted' where suggested?	<p>numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will <b>normally</b> only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere'). It was proposed that 'adopted' is added in reference to the Hot Food Takeaway SPD for clarity.</p> <p><b>Responses</b> (3). One agreed others commented that no more cafes are needed and that takeaways should be ten minutes walk time.</p>	concluded to remain fit for purpose with no further change.	'adopted' SPD.
Q66: Do you have any comments on our suggestion that reference should be made to the 5-minute walk school exclusion zone?	<p><b>Context:</b> This question was asked in order to gauge views on an exclusion zone around schools for hot food takeaways.</p> <p><b>Responses</b> (6) 5 agreed with the suggestion also saying that advertising should be restricted and that there is a need to define how the five minutes walk time should be defined. One disagreed stating that there needs to be flexibility, and that five minutes walk time is not supported.</p>	Although there is potential to add this in it is already addressed in the Hot Food Takeaway SPD so the link to this will be added in to policy.	Link to the Hot Food Takeaway SPD.
<b>Potential new policy: Local services</b>			
Q67: Do you have any comments on our proposal? Have you any examples of a policy	<p><b>Context:</b> The question was asked to gauge views on a possible new policy, including draft wording to recognise the importance to local communities of the role of shops and shopping parades outside of the centres hierarchy.</p>	Retail evidence (2024) states that Local Parades are outside of the NPPF hierarchy and therefore don't form part of any sequentially preferable sites. However, there	No new policy – expand CO2 scope through

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which protects local shopping parades?	<b>Responses</b> (9). 7 supported the proposal, it was commented that the impact of HGVs should be considered. Libraries should also be considered. In terms of other comments one commented that evidence of marketing for retail / change of use should be required, and one commented that Keresley is unsustainable.	may be merit in including this in a community policy based on local services therefore this issue has been considered in that chapter.	explanatory text instead to include this.
<b>Chapter 7: Communities</b>			
<b>Review of Policy CO1: New or improved social community and leisure premises</b>			
Q68: Do you have any comments on our review of Policy CO1?	<b>Context:</b> Policy CO1 relates to new or improved social, community and leisure premises and the consultation suggested that the policy was working well and did not need to be changed. Views were sought on this. <b>Responses</b> (8), these included several comments on the need to cite Liveable Neighbourhoods / Neighbourhood Planning and the 20 minute toolkit, planning for shared spaces, protecting green spaces, ensuring leisure facilities in Keresley, supporting new facilities.	Comments are noted and will be considered in the review of policy for the following areas: accessibility (re liveable neighbourhoods), shared and flexible spaces (design), green space policy and Keresley SUE.	No change proposed to CO1.
<b>Review of Policy CO2 Re-Use of or Redevelopment of Facilities</b>			
Q69: Do you have any comments on our suggestions for amending Policy CO2?	<b>Context:</b> This question was asked in response to suggested changes to the scope of the policy to include community uses beyond the current local Plan definition of 'community premises' where they could be demonstrated as being important	The explanatory text to the policy will be expanded to include other uses such as pubs and shopping parades. In terms of specific marketing circumstances these	Explanatory text to policy to be expanded to include pubs

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	<p>e.g. a local pub or a shopping parade. A review of proposals involving loss of education facilities was also suggested.</p> <p><b>Responses</b> (9). A range of responses were made in relation to the types of uses. It was commented that NHS properties were constrained by marketing requirements and that flexibility needs to be given in terms of the evolution of the NHS estate. A separate policy was requested for educational premises distinct from community use as these are not subject to market demand. Some felt a wider definition was a positive change others requested a definitive list for clarity. A site-specific policy to guide the former City Leisure Centre was requested, as was a comprehensive masterplan for city council assets. It was commented that Assets of Community Value do not need local plan policy as already covered in national policy. It was commented that the existing policy part 1 lists 3 criteria – suggestion that the word ‘or’ should be added to clarify that if one of the criteria are met then redevelopment can be supported.</p>	<p>would need to be considered on their merits in relation to the planning application process rather than a blanket policy being applied. It is considered that it is still right to consider education and health under this definition of ‘community use’. In terms of plans for council assets and assets of community value these would be governed under separate processes rather than planning procedure.</p>	<p>and shopping parades.</p>
<b>Review of Policy CO3 Neighbourhood and Community Planning</b>			
<p>Q70: Do you have any comments on our view that Policy CO3 needs a</p>	<p><b>Context:</b> A minor update was proposed through the consultation in order to bring terminology up to date in line with the NPPF.</p>	<p>On reflection the wording is considered fit for purpose in the local context as it is felt to be flexible and resilient.</p>	<p>No change.</p>



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
minor update as described?	<b>Responses</b> (10). There was general support for this with comments relating to the need to be proactive and support Neighbourhood Planning and to recognise this is done voluntarily.		
<b>Chapter 8: Green Belt and Green Environment</b>			
<b>Review of Policy GB1 Green Belt and Local Green Space</b>			
Q71: Do you have any comments regarding Policy GB1?	<p><b>Context:</b> Q71 and 72 should be read together. Q71 was focusing upon general comments relating to the policy overall.</p> <p><b>Responses</b> (143). The majority of these (114) were calling for all of Coundon Wedge to be Green Belt and objecting to development at Browns Lane. Other comments related to protecting Green Belt, providing the right infrastructure to support development, using Natural England's Accessible Greenspace Standards, the policy should reference blue infrastructure, sites should be managed for community benefit. A number of representors referred to sites they were promoting.</p>	In terms of the Browns Lane allocation, this was at the time being considered as a planning application and so the objections needed to be considered in the light of the decision making, rather than the plan-making, process (which approved the application). In terms of the other comments, the plan needs to reflect the National Planning Policy Framework in terms of the purposes of Green Belt and some comments go beyond this scope, however, will be addressed in relation to green space matters. Site promotion submissions have been considered separately.	Policy to be updated – wording to reflect national policy, Local Green Space to have its own policy.
Q72: Do you think that Green Belt and Local	<b>Context:</b> Q72 was asked because the policy currently covers Green Belt and Local Green	The review proposes separating Green Belt and local Green	Separate out Green Belt

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Green Space should be covered in two separate policies?	<p>Space but as, nationally, these are separate designations the consultation suggested these should be separate policies.</p> <p><b>Responses</b> (21). The majority of these (16) agreed that separate policies would be preferred. Two disagreed. Others commented more generally about needing to protect Green Belt, suggesting that the public should be able to propose Local Green Space sites, and a strategic approach is needed.</p>	Space policy to reflect the different types of designation and the context within which they must be assessed.	from Local Green Space – each should have its own policy.
<b>Review of Policy GB2: Safeguarded land in the Green Belt</b>			
Q73: Do you have any comments of the review of Policy GB2?	<p><b>Context:</b> This policy identifies a number of sites stating that they will be ‘subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District’. Views were sought on this.</p> <p><b>Responses</b> (21). Responses were varied. Some were promoting their site submissions on the safeguarded sites, some commented more generally that they needed to be developed, that proximity to the university is relevant, it was commented that cross boundary work with Warwick DC is needed, some felt that they should not be developed and that Green Belt should be protected, some commented that the NPPF says that safeguarded land should be reviewed after the plan period i.e. after 2041.</p>	In terms of the timeline for review of the safeguarded land Policy GB2 is clear that this needs to be done as part of a review of the local plan i.e. at this time. Given that the South Warwickshire Local Plan is emerging it is considered appropriate to retain the safeguarded status of these sites for the present time.	Retain safeguarded sites.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy GE1 Green Infrastructure</b>			
Q74: Do you have any comments on our review of Policy GE1: Green Infrastructure?	<p><b>Context:</b> A number of changes to this policy were proposed through the consultation, including the inclusion of trees, key corridors for enhancement, wildlife friendly buildings, references to health and climate change, targets for tree canopy cover, links to natural capital and ecosystems, baseline data for biodiversity.</p> <p><b>Responses (28).</b> There was a good level of support to the proposals (12), 6 commentators objected stating that GE1 was sufficient already, that the issues raised were already covered and that the list was too vague, and targets would be hard to monitor (tree canopy coverage). Several comments and suggestions were made in terms of potential standards which could be introduced including canals / blue infrastructure, giving weight to the Local Nature Recovery Strategy, Woodland Trust Access to Woodland Standards, 20% biodiversity net gain (and maintaining units for 50 not 30 years, the latter being the national figure), Natural England's Green Infrastructure Framework, soil biodiversity. Some concerns cited over inaccuracies (river Sherbourne is a tributary of the Sowe). Removal of culverts supported but should also reference flood plain connectivity and natural flood management.</p>	<p>Comments noted – propose policy is amended to incorporate blue infrastructure for comprehensiveness and clarity.</p> <p>References should be updated to ensure the policy links to the emerging Local Nature Recovery Strategy (LNRS) and to the Council's emerging Green and Blue Infrastructure Strategy and Action Plan which is being formulated using Natural England's Green Infrastructure Framework as this will address the issues highlighted.</p>	Policy to be updated to reflect recommended changes.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	Inequalities should be addressed and related to health. Need for viability testing.		
<b>Review of Policy GE2 Green Space</b>			
Q75: Do you have any comments on our proposals to retain the above policy with no changes?	<p><b>Context:</b> It was suggested through the consultation that the Green Space policy remained up to date.</p> <p><b>Responses (4).</b> The following was requested to be added to policy wording 'development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space'. It was also commented that reference to green space standards does not reflect playing fields, the new playing pitch strategy does not use a standards approach. Up to date assessment work is needed.</p>	Policy to be revised to reflect flood mitigation, and to reflect the new requirements of the Playing Pitch Strategy.	Update policy in line with recommendations.
<b>Review of Policy GE3 Biodiversity, Geological, landscape and Archaeological Conservation</b>			
Q76: Do you have any comments on our suggested policy approach to strengthening and updating Policy GE3?	<p><b>Context:</b> A number of changes were proposed in the consultation to update this policy in line with the Environment Act and other, more local considerations. This included reference to 10% BNG, identification of offsetting sites, key enhancement corridors, green spaces to achieve ANGS standards, new targets for connectivity, reference to veteran trees, improvements to blue infrastructure.</p>	Policy needs to be updated to reflect national legislation in regard to Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS), and there is potential to update the Biodiversity Net Gain SPD to provide further guidance	Update policy as recommended.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p><b>Responses</b> (22). Respondents were split equally between those who cited agreement and those who did not (both 6). Those objecting felt policy was sufficient, that viability testing would be needed and that the reference to ‘veteran tree quality’ is not an industry standard and is confusing. Those supporting, or offering comment advised that connectivity is essential (requiring bird boxes needs access to commuting routes for wildlife), should link to Natural England’s Benefits from Nature tool, should link to the Local Nature Recovery strategy and Biodiversity Net Gain plan, should not top street trees (to protect the canopy), protect trees, do not use whips on new estates, agree with offsetting on council land but not private sites, protect irreplaceable habitats, habitat survey river metric should be 10m from red line boundary, medieval ridge and furrow should be given more protection.</p>		
<b>Review of Policy GE4: Tree Protection</b>			
Q77: Do you have any comments on our review of Policy GE4 Tree protection?	<p><b>Context:</b> A number of changes were proposed in the consultation which it was felt might strengthen policy GE4 including buffer zones (ancient woodland), compensatory measures and planting specifications.</p> <p><b>Responses</b> (13). Of these, 6 supported the changes, 3 objected, stating that it should accord with national policy, that ‘TPO quality’ should not</p>	Comments noted. Some proportionate additions to policy recommended to provide clarity and strengthen links to the SPD.	Update to provide additional clarification and to strengthen policy and

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>be referenced, if a tree is of such quality, it should be TPO'd, that the reference to 'specimen tree' is confusing as there is no such designation and it should not be confused with other designations i.e. ancient woodland and veteran trees. It was considered onerous to require exceptional circumstances to justify loss if the rest of the development is acceptable. The proposals regarding buffer zones and ancient woodland / veteran trees were controversial, one commented that it should be 50m not 30m, and another referencing Natural England standing advice of 15m. Others sought clarification on what is meant by 'adequate', 'unacceptable loss', 'adequate compensatory provision'. One respondent asked that the policy works in tandem with the BNG metric and the precautionary principle which requires developers to consider tree retention on site.</p>		link to the SPD.
<b>Chapter 9: Design</b>			
<b>Review of Policy DE1 (Encouraging High Quality Design)</b>			
Q78: Do you have any comments on the review	<b>Context:</b> A number of changes were proposed in the consultation to strengthen policy in relation to	Policy could be strengthened to include better placemaking, social	Strengthen policy DE1

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
of Policy DE1 (Encouraging High Quality Design)?	<p>adaptation and resilience, social sustainability principles, the impacts of an ageing population, diversity, mixed tenures, innovation, health, wellbeing and cross referencing to heritage assets.</p> <p><b>Responses</b> (27). A range of responses were received. In terms of the references to HAPPI and Building for a Healthy Life principles some felt these were unduly onerous (one commented HAPPI relates to older people), however there was also support too. Some felt the proposals duplicated other areas of the plan (e.g. references to open space). There was support for local design codes, the recognition of neurodiversity in design, increased emphasis on climate change and health and wellbeing, the need to link to policy HW1 and a potential health checklist, the need to take viability into account, promote a mix of tenures, the need to take a comprehensive and co-ordinated approach to development (including utilities), should include gentle densification, set out key expectations on energy efficiency.</p>	inclusion, design codes and a range of other matters to help provide further clarity and direction.	and add new policy DE2 on delivering high quality places. Reference to design codes to be included.
<b>Chapter 10: Heritage</b>			
<b>Review of Policy HE1, Conservation Areas</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q79: Do you have any comments on the review of Policy HE1?	<p><b>Context:</b> It was proposed through consultation to add in the new Conservation Areas and Brownhill Green and Earlsdon.</p> <p><b>Responses</b> (10). It was correctly pointed out that the reference to DE1 in the question should have been HE1. Notwithstanding this, the comments were made in the correct policy context. There was support for the proposed update, some felt the policy could be widened to include net zero and climate change, conservation areas should be reviewed in line with national policy, the Coventry Canal Conservation Area should be reviewed to include more of Longford's Grade 2 listed buildings.</p>	<p>The policy to be updated to include the new Conservation Areas of Earlsdon and Brownhill Green.</p> <p>It should also be updated to enable additional areas to be added over the plan period if required. Conservation Areas and Listed Buildings are also covered in separate legislation beyond the scope of this review.</p>	Update in line with officer recommendation.
<b>Review of Policy HE2, Conservation and Heritage Assets</b>			
Q80: Do you have any comments on our review of Policy HE2, Conservation and Heritage Assets?	<p><b>Context:</b> The consultation suggested the policy was up to date but could benefit from a reference to Historic England guidance 'streets for all'.</p> <p><b>Response</b> (10): it was suggested that all conservation areas should be reviewed, Brownhill Green and Earlsdon should be added, that Coventry's mid century modernist heritage 'festival of Britain', focus on post war, heritage should be carefully appraised, should restore the market building, the latest Historic England publications should be referenced, the reference to 'streets for all' is not supported as has been replaced by updated guidance, publications and advice notes should be considered in policy</p>	<p>Some of the comments relate to matters which are controlled already by national policy, some relate to more localised matters and these will be considered in the light of what needs to be included in local policy to add value. It is suggested that rather than cite specific guidance a link is instead provided to Historic England's webpage to ensure resilience over the plan period. Also recommend policy is brought up to date to reflect additional</p>	Update policy in line with officer recommendation.



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	justification not policy, demolition of assets should require substantial justification, that assets should be sympathetically re-used, remove inappropriate designations such as Spon End to help regeneration.	local context. Include reference to the importance of post World War 2 heritage in the city centre.	
<b>Review of Policy HE3 Heritage Park – Charterhouse</b>			
Q81: Do you have any comments on the review of Policy HE3 (Heritage Park – Charterhouse)	<b>Context:</b> Minor changes to update the latest position were proposed by the consultation. <b>Responses</b> one person commented, to say they supported this.	Policy reviewed and considered to remain fit for purpose	No change
<b>Review of Policy HE4 Archaeology</b>			
Q82: Do you have any comments on whether a separate archaeological policy would be beneficial (Policy HE4)	<b>Context:</b> Comments were sought on whether there should be a separate archaeology policy. <b>Responses</b> (6) There was broad support for this proposal. There was one comment that this was not strictly necessary as heritage assets include archaeology.	Note the comments and consider introducing a new policy	New archaeology policy to be added
<b>Chapter 11: Accessibility</b>			
<b>Review of Policy AC1: Accessible Transport Network</b>			
Q83: Do you have any comments on the review of Policy AC1 (Accessible Transport Network)	<b>Context:</b> The consultation proposed updates to bring policy in line with national policy and strategy. <b>Responses (25):</b> The majority of responses supported the proposed changes (13), but those that disagreed (3) sought for consideration for those living in more rural areas where public	Note the comments. Policy could be updated to reflect latest national, regional and local policy and guidance and the Council's emphasis on prioritising walking, cycling and sustainable modes of travel.	Update in line with officer recommendation

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	transport is inadequate and consideration of people that can't or don't want to cycle. Other comments (11) were concerned over there being too much emphasis on untried and untested methods of transportation. E-Scooters need to be included and a joined up and strategic approach needs to be taken.	<p>Policy to include the latest sustainable travel modes such as very light rail and emerging technologies.</p> <p>Policy including improvements to street greening and layout as part of ways to improve the pedestrian and cycle experience.</p>	
<b>Review of Policy AC2: Road Network</b>			
Q84: Do you have any comments on a mechanism to support the provision of Electric Vehicle Charging Points (EVCP)?	<p><b>Context:</b> It was proposed to include separate and specific requirements on how EVC can be better supported.</p> <p><b>Responses (17):</b> Broad support (8) for more EVCP with the aim to change behaviour. Objections to the proposal (7) include objections to road schemes and that the proposals are onerous as this is covered by Buildings regs and possibly wouldn't be proven to be viable. Other comments (3) including ensuring the proposal is proportionate to developments and that active and passive spaces should be sought instead of offsite contributions.</p>	Comments noted and the approach to increasing the provision of EVCP will be included, however it sits better under Policy AC1 so will be included there.	See officer comments regarding AC1
<b>Review of Policy AC3: Demand Management</b>			
Q85: Do you have any comments on whether parking standards should	<b>Context:</b> Proposal is for a more nuanced approach to the current parking distinction of inside the ring road and outside the ring road.	Parking standards to be updated	Update Appendix 5

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
reflect the strategy to reduce overall levels of car travel and promote more sustainable alternatives?	<b>Responses (17):</b> Broad support for the proposal (7) with other comments (11) stating the approach should be flexible, based on a site by site basis, reflect local characteristics, acknowledges that car ownership is unavoidable and that change will only happen when sustainable modes of transport are safe, reliable, convenient and cost effective.		on parking standards.
Q86: Do you have any comments on whether parking levels should take into account a range of factors such as the nature of the accommodation, availability of public transport, ease of walking and cycling in the local area etc?	<b>Context:</b> The proposal is for a more nuanced approach to parking levels that accounts for the nature of the development and site context. <b>Responses (10):</b> Broad support for the range of factors to be taken into account (10), but that removing on-site parking should be evidenced by existing and future movement patterns so as not to increase on-street parking and that consideration should be given to improved green corridors and networks between rural communities and key destinations.	Support is noted , the parking standards to be updated to reflect local context.	Update to Appendix 5 parking standards
Q87: Do you have any comments on the mechanism of mobility credits to be secured as part of planning permissions to provide active and sustainable modes of travel and their inclusion in policy AC3?	<b>Context:</b> To introduce a mechanism to secure mobility credits as part of planning permissions. <b>Responses (10):</b> The mechanism needs to be evidenced, proportionate, flexible, resourced and well implemented to not render development unviable. The proposal will only work if there is a reliable bus service and investment in sustainable modes of transport and is easy to use/access, especially for older and younger people.	Support is noted and reference will be included in AC3 with a proposed update to the Coventry Connected SPD	Update A3 in line with officer recommendation.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy AC4: Walking and Cycling</b>			
Q88: Do you agree that strengthening the wording to promote cycling and walking more is the right approach? Please provide comments	<p><b>Context:</b> It is proposed that the wording in every part of Policy AC4 is strengthened to better reflect the higher priority which the Council is now placing on promoting walking and cycling and specific requirements are included.</p> <p><b>Responses (17):</b> Broad support for the proposals (16) but needs to be part of a strategic multi-modal integrated transport system including cycle schemes and consideration needs to be given to those physically unable, people doing multiple trips and the increase in e-scooters and e-bike delivery services.</p>	Support is noted and approach will be strengthened to reflect this	Update AC4 in line with officer recommendation and to reflect the Transport Strategy.
<b>Review of Policy AC5: Bus and Rapid Transit</b>			
Q89: Do you have any comments on the review of Policy AC5 (Bus and Rapid Transit)?	<p><b>Context:</b> The consultation suggested the policy be updated in terms of progress on Very Light Rail and for the experience of bus travel to be improved for all users.</p> <p><b>Responses (11):</b> Recognition that bus services need improving and that people are looking to travel around the city to shops and services, not just into the city centre. The approach should not just focus on VLR with areas of high deprivation need to be better considered for improved bus services.</p>	Support is noted and the policy will be strengthened to reflect the Transport Strategy and wider regional context..	Update in line with officer comment.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy AC6: Rail</b>			
Q90: Do you have any comments on the review of Policy AC6 (Rail)?	<p><b>Context:</b> No changes were proposed via the consultation although a re-ordering of policies to reflect the importance of sustainable transport was suggested.</p> <p><b>Responses (10):</b> Broad support for the proposal (8), but NUCKLE needs the additional stations to be delivered to address Coventry's through traffic issue.</p>	Support is noted. Current policy still supported, but should be updated to include support for electrification of rail lines and improved routes to the East Midlands	Update in line with officer recommendation.
<b>Review of Policy AC7: Freight</b>			
Q91: Do you have any comments on the review of Policy AC7 (Freight)?	<p><b>Context:</b> Some updates in line with Government strategy were proposed via the consultation along with strategies to reduce certain HGV movements.</p> <p><b>Responses (9):</b> Broad support for the proposed changes (8), but also needs to be dealt with at the sub-regional level, M6 junction improvements are imperative and impact on existing communities and air quality need to be taken into account. Standards for distances between industrial buildings and dwellings along with buffers and bunds should be introduced.</p>	Support is noted. Policy to be updated requiring applicants have more consideration of HGV movements and facilities on site, particularly regarding big warehouse and distribution centres and avoidance of HGV traffic on smaller roads. Air quality is included in the Environmental Management chapter.	Update to policy to ensure this reflects the need to control freight movement.
<b>Chapter 12: Environmental Management, Minerals and Waste</b>			
<b>Review of Policy EM1 Planning for Climate Change</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q92: Do you have any comments on the proposed policy direction that Policy EM1 needs updating with the introduction of specific targets for mitigating and addressing the challenges of climate change and working towards achieving net zero in all new build developments?	<p><b>Context:</b> Policy EM1 was considered out of date as it did not reflect the emerging Climate Change Strategy, NPPF and updated and incoming Building Regulations.</p> <p><b>Responses</b> (26). Of these, 15 respondents supported a need to update the policy. Several stated that this needed to be in line with building regulations, that timescales for bringing in standards needed to be clear, that evidence is needed. Some suggested ways of achieving net zero eg solar panels, retrofitting and good maintenance. One commented the needs to the logistics sector should be taken into account. One sought definition of the term 'low flood risk'. Another cited the need to mitigate for harm to the natural environment</p>	<p>In terms of the matters raised, the review of the plan will consider whether these are best served through updated policy EM1 or elsewhere in the plan (to avoid confusion and duplication) and whether additional standards can be introduced subject to viability and this will be followed with new policy additions into the plan. Further evidence has since been produced to explore this further. In terms of flood risk definition, further information is here <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a></p>	<p>Update policy EM1 to reflect the Council's Climate Change strategy and the evidence base.</p>
Q93: Do you have any comments on the above proposals?	<p><b>Context:</b> This question sought views on non-domestic developments, retrofit, refurbishment and change of use schemes, considering that there is scope to achieve net zero for such proposals, in line with the WMCA Climate Change Adaptation Plan and Coventry City Council's emerging Adaptation and Resilience Plan.</p> <p><b>Responses</b> (15). 8 respondents expressed support, others commented that the policy should be stepped in line with Government policy, that a timetable is needed, that different building forms</p>	<p>Further evidence has been commissioned on Carbon Policy, and on viability to inform the potential introduction of new policy to address these issues.</p>	<p>Update the plan accordingly where possible to reflect updated evidence and the Council's ambitions..</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	and uses would be needed, that district heating should be referenced and that the role of canals should be considered.		
<b>Review of Policy EM2 Building Standards</b>			
Q94: Do you have any comments our suggested policy proposals in that Policy EM2 needs to be deleted and replaced with an up-to-date new policy?	<p><b>Context:</b> it was considered that this policy should be deleted as it was out of date, and should propose more challenging building standards as well as a suite of options in relation to biodiversity.</p> <p><b>Responses</b> (21) 14 respondents expressed support, two objected. A series of comments were also received, some felt the policy should only refer to Building Regulations, some wanted more ambitious targets, and enforcement action taken where not met. The need to consider coal mining legacy and land instability was mentioned.</p>	Having reviewed the evidence it is considered that the policy should be deleted and new policies introduced instead to reflect updated evidence and the Council's ambitions.	As per the officer comment
Q95: Do you have any comments on our proposals for setting more ambitious standards for new build developments with the introduction of specific targets that go beyond existing Building Regulations as described	<p><b>Context:</b> This question was aimed at establishing any local evidence and justification for going beyond Building Regulations.</p> <p><b>Responses</b> (23). No specific evidence was received. Comments were more general, stating that evidence would be needed, that this should include viability evidence, that there should be a whole-life carbon emissions assessment approach and carbon offsetting.</p>	See comment above	See above

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
above? Please provide detail including what such targets might be, and any evidence to show how these would be viable and deliverable.			
<b>Review of Policy EM3 Renewable Energy Generation</b>			
Q96: Do you have any comments on our suggestions for updating Policy EM3?	<p><b>Context:</b> The consultation suggested that policy should be strengthened in line with the NPPF and local ambitions including the potential for requiring renewables in developments.</p> <p><b>Responses</b> (19). There was support by 12 respondents, 3 objected and several general comments were made stating further evidence is needed.</p>	Comments noted. It is recommended that this policy adds no local added purpose and should be replaced with new policies which reflect updated evidence and the Council's ambitions.	
<b>Policy EM4 Flood Risk Management</b>			
Q97: Do you have any comments on our suggestions that Policy EM4 needs updating as described above with further technical amendments to help strengthen the policy further?	<p><b>Context:</b> The consultation proposed updates to bring policy in line with national and local policy and strategy, cross reference to Green Infrastructure, and a potential new SPD.</p> <p><b>Responses</b> (15). There was general support for this, some expressed views about not allowing or restricting certain types of development in areas of flood risk, others felt there was some duplication with other policy areas (eg biodiversity).</p>	The policy should be updated in line with national policy, local evidence and consideration will be given to a new SPD or further guidance. Policy will be reviewed to ensure that it does not duplicate other policies of the plan.	Update the policy in line with officer recommendations.



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy EM5 Sustainable Drainage Systems (SuDS)</b>			
Q98: Do you have any comments on our suggestion that Policy EM5 needs updating as described above with further technical amendments to help strengthen the policy further?	<p><b>Context:</b> The consultation proposed that this policy needs a minor technical update in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and the latest research and guidance published for successful SuDS.</p> <p><b>Responses</b> (12): there was general support for this. There was one question about SuDS maintenance and another comment about the need for evidence.</p>	Comments noted and the policy should be updated in accordance with the proposals. An SPD or additional guidance is also to be produced.	Update policy in line with officer recommendation.
<b>Review of Policy EM6 Redevelopment of Previously Developed Land</b>			
Q99: Do you agree with our proposal that Policy EM6 needs updating as described above with further technical amendments to help strengthen the policy further?	<p><b>Context:</b> The consultation proposed that this policy needs a minor technical update in terms of specific reference Water Environment Regulations.</p> <p><b>Responses</b> (7) There was support for policy updates as proposed, and comments around the need for policy to reflect the NPPF</p>	Update policy as recommended through the consultation	Update in line with officer recommendation.
<b>Review of Policy EM7 Air Quality</b>			
Q100: Do you agree with our suggestion that Policy EM7 needs updating as described above?	<p><b>Context:</b> The policy was generally considered to be up to date although it was suggested a minor update to the policy could include a specific reference to the Ministerial Direction for nitrogen dioxide alongside the AQMA to give the policy more weight.</p>	Update the policy as recommended through the consultation.	Policy update as proposed.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<b>Responses (8):</b> of these 5 agreed with the proposals. There were no objections. It was commented that the policy must address air quality on designated sites, that it should be updated in line with the Air Quality SPD, and that cumulative effects of vehicular traffic to the north of the city needs to be considered.		
<b>Review of Policy EM8 Waste Management</b>			
Q101: Do you agree with our view that Policy EM8 remains up to date?	<b>Context:</b> Policy EM8 deals with waste management <b>Responses (6).</b> Of these, two agreed, one objected and a number of general comments were received. It was commented that there needs to be a more general approach to waste management and that it needs to be considered in terms of the circular economy, that its should be considered alongside net zero policy and NO2 emissions, and that more detail is needed on MRF volume capacities.	The comments are noted and are considered to relate to the Waste Management Strategy: policy wording is considered to remain fit for purpose	No change proposed.
<b>Review of Policy EM9 Safeguarding Mineral Resources</b>			
Q102: Do you agree with our view that Policy EM9 remains up to date?	<b>Context:</b> this policy relates to mineral resources such as aggregates and recycled and secondary materials and the safeguarding of these. <b>Responses (1).</b> It was agreed the policy was up to date.	Comments noted: no change proposed as wording remains fit for purpose.	No change
<b>Review of Policy EM10 Non Mineral Development I Mineral Safeguarding Areas</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q103: Do you agree with our view that Policy EM10 remains up to date?	<b>Context:</b> this policy cites a balanced approach to protecting minerals against the need to attract investment and regeneration in a mainly built up area. <b>Responses:</b> None received	No comments received. No change proposed.	No change
<b>Chapter 13 Connectivity</b>			
<b>Review of Policy C1: Broadband and Mobile Internet</b>			
Q104: Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?	<b>Context:</b> It was proposed that the policy remained relevant but duplicated national policy so potentially could be deleted and views were sought on this. <b>Responses:</b> one comment was received making general observations about difficulty being able to deliver on unadopted roads.	The comments are noted, these relate to technical matters of delivery rather than policy so this is an issue for the providers. Consideration will be given to whether the policy should be retained as it duplicates national policy.	Delete policy
<b>Review of Policy C2: Telecommunications</b>			
Q105: Do you have any comments on our assessment of Policy C2 Telecommunications?	<b>Context:</b> It was proposed that the policy remained relevant but duplicated national policy so potentially could be deleted and views were sought on this. <b>Responses:</b> None	No responses. Propose policy is deleted as this duplicates national policy.	Delete policy
<b>Review of Policy IM1: Developer Contributions for Infrastructure</b>			
Q106: Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any	<b>Context:</b> The consultation suggested that the policy on contributions for infrastructure was still relevant but should have a minor change to reference 'developer contributions' rather than CIL	Comments noted, and the term 'developer contributions' is used as this relates to a range of potential funding sources such as Section 106 or any future	Minor update to refer to 'developer contributions'.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
other comments on our review of this policy?	<b>Responses (8)</b> Comments generally supported the reviewed wording, one considered the term ‘developer contributions’ to be too bland preferring ‘CIL’ and one suggested CIL is brought in. Others commented about the need for timely provision of infrastructure. One respondent wanted to see more contributions for Green Infrastructure.	requirements which may be introduced such as the Infrastructure Levy. CIL has been considered by the council but was found not to be viable but again, Government may introduce new mechanisms. In terms of what contributions are spent on, there is legislation which determines this but the Council does take contributions for open space, and also biodiversity (Biodiversity Net gain)	
<b>Infrastructure Delivery Plan (IDP)</b>			
Q107: Do you have any comments on the updated Infrastructure Delivery Plan at Appendix 3?	<b>Context:</b> In order to ensure that the plan is viable, deliverable and that development is delivered alongside a range of infrastructure requirements and Infrastructure Delivery Plan is prepared. <b>Responses (9):</b> Comments varied including: the section on cross boundary issues being blank, glossary needs updating, local infrastructure strategies needed, too vague, needs to inform viability, partners need to be engaged eg National Highways.	The Infrastructure Delivery Plan will be updated and included as an appendix	Update the IDP
<b>Chapter 14: Coventry City Area Action Plan Context</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q108: What are your views on the most effective mechanisms for the future planning of Coventry City Centre? Please provide supporting evidence where relevant</p>	<p><b>Context:</b> The consultation wanted to explore views on options for the best ways of planning for the city centre including whether the AAP remains fit for purpose or whether other mechanisms might be more appropriate, for example masterplans</p> <p><b>Responses (8):</b> responses varied, some felt it provided a useful and flexible framework for development but could be absorbed as a chapter into the Local Plan. Suggestions were made as to which policies should be retained and which could be changed. There was also support for masterplans and design codes. A number of respondents wanted to discuss specific areas e.g. heritage, university campus, employment, food production, retail, housing, student accommodation.</p>	<p>The feedback is noted and the relevant aspects of the AAP will be pulled through in to a new chapter of the Local Plan.</p>	<p>New chapter in the Local Plan.</p>
<b>Sustainability Appraisal</b>			
<p>Feedback was sought on the Sustainability Appraisal which was consulted on at the same time</p>	<p><b>Responses (4)</b></p> <p>Concern was expressed in terms of the level of harm to the historic environment from the higher growth scenarios depending on site location, and the SA should also reflect uncertainty on the density scenarios pending further work.</p> <p>It was proposed that the evidence base should include landscape and visual assessments, soil and ecological surveys, green infrastructure and</p>	<p>The responses to be discussed with the SA consultant and assessed accordingly regarding the next iteration of the SA</p>	<p>The SA is part of the evidence which influences the evolution of the plan.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>biodiversity mapping, protection of best and most versatile agricultural land grades 1,2 and 3a, mitigation measures for site allocations and Habitats Regulation assessment.</p> <p>A developer commented that there were no exceptional circumstances for deviating from the standard method, that the high growth scenario should be considered, that green belt should be used to help deliver affordable housing and address socio economic matters.</p> <p>One respondent commented that Birmingham Airport should be consulted on planning applications.</p>		
<b>Equalities and Health Impact Assessment</b>			
Feedback was sought	No comments received.		

## Appendix 1 – Comments Form

### Coventry City Council Local Plan Review

#### Issues and Options Consultation, Sustainability Appraisal and Equality / Health Impact Assessment

#### Comments form

If you cannot respond using our online system please use this form attached to share your comments on the first stage of our Local Plan Review. Completed forms should be scanned and sent to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), or posted to **Planning Policy, PO Box 15, Council House, Earl Street, Coventry, CV1 5RR.** The deadline for submissions is **12<sup>th</sup> September 2023.**

Please note, submitted information including your name and your comments will be publicly available. Other personal details e.g. private address and email will be kept confidential. For further information please read our privacy statement <https://www.coventry.gov.uk/planning-policy/planning-policy-privacy-notice> (printed copies will be made available alongside this form)

Name:.....  
.....

Address:.....  
.....  
.....

Representing (If Applicable):  
.....  
.....  
.....

Email (Optional):

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Would you like us to add your email to our consultation database, so you are aware of updates and other planning consultations. (Please tick yes if you consent to us adding your details). Yes ☐

**Which document are you commenting on (please tick).**

- |  |                          |
|--|--------------------------|
| Issues and Options Consultation document | <input type="checkbox"/> |
| Sustainability Appraisal                 | <input type="checkbox"/> |
| Equality & Health Impact Assessment      | <input type="checkbox"/> |





## **Appendix 2 – Press release**

### **Media release**

Tuesday 18 July 2023

### **Now is the right time review Coventry Local Plan**

A senior councillor responsible for housing in the city said he has always said that the right time to review the Local Plan is once the Council has more accurate figures – and that is what is now available.

Cllr David Welsh, Cabinet Member for Housing and Homelessness, said: “We have begun a consultation to look at reviewing the city’s Local Plan because it is the right time to.

“I have always said that we need more up-to-date and accurate statistics and that is what we now have following the publication of the national census figures.”

Coventry City Council is undertaking a full review of its Local Plan and is running an initial public consultation stage. The Council recommended a full review of the city’s local plan in December 2022 stating that it is absolutely the right thing to do.

The consultation will seek views across the full range of local plan policies, including the methodology employed to establish local housing need.

Councillor Welsh, added: “We also need to keep questioning the current national policy. We want to meet our housing needs - but the government is expecting Coventry to absorb a 35 per cent higher number of homes than other places. Current housing forecasts used by the government are placing a greater burden on cities like Coventry. We want to challenge them on their numbers.”

“We do need more affordable, good standard homes to meet housing need and our plan must help to deliver this – but the numbers must be accurate and achievable.

“Helping create a greener infrastructure and recognising the impact of climate change are also factors we need to draw into the review.

“We are looking for local people to tell us what they think and get involved in the consultation process.”

Since the Coventry Local Plan was drawn up in 2017 there have been significant changes to national policy including the method for calculating housing need.

Cllr Welsh added: “A review will also help us to look at housing affordability, and environmental factors. It also needs to support economic growth and retain accessible open space.”

“Local people need to have every opportunity to give their comments.”

One part of the review will reference the Housing and Economic Development Needs Assessment (HEDNA), which highlights the government’s ‘cities and urban centres uplift’ of a 35% additional housing delivery target, based on Coventry being one of the top 20 populated cities in the UK.

Cabinet members gave their support to start the ‘regulation 18’ consultation phase, known as ‘issues and options’, at last week.

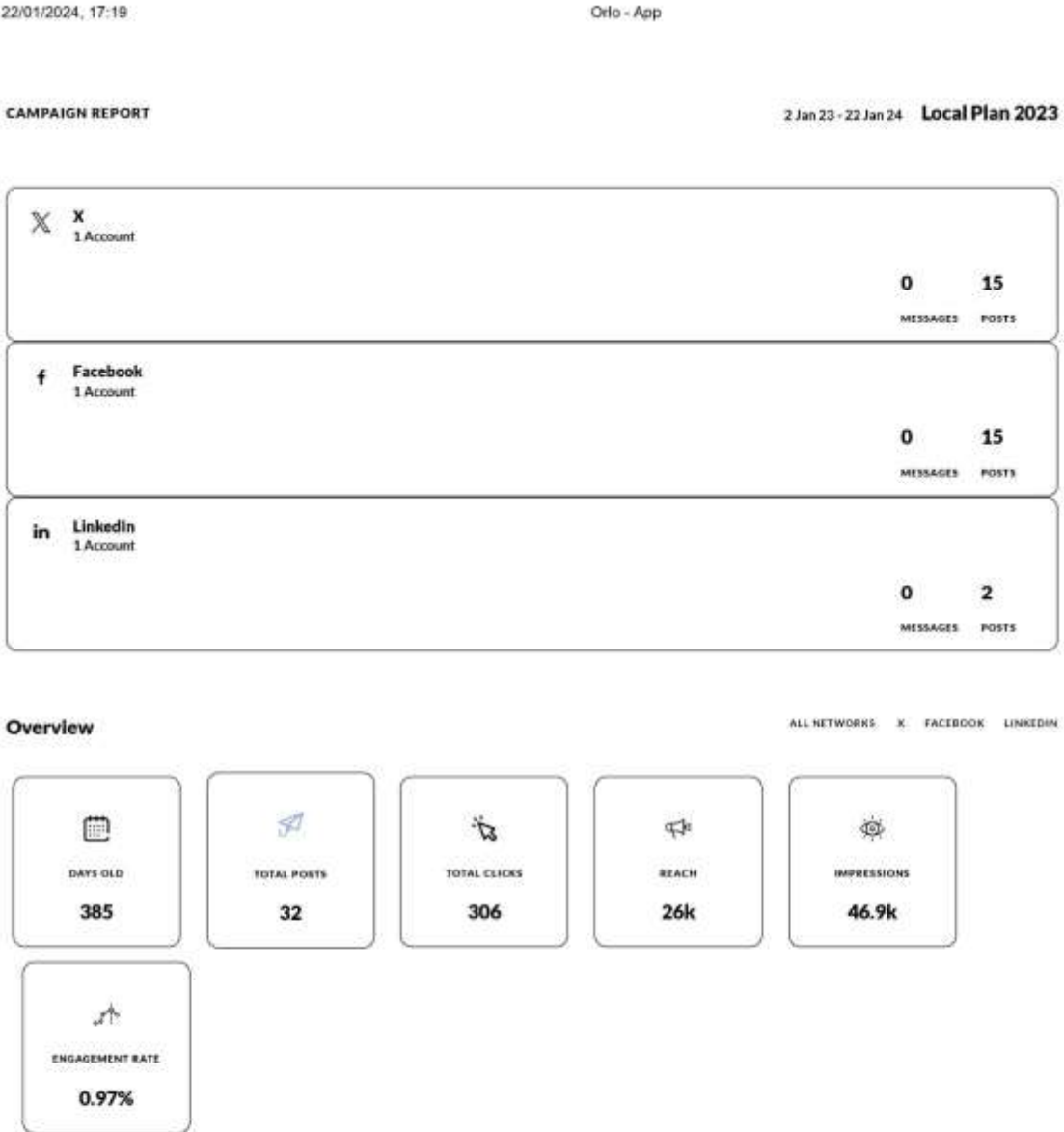
The key issues being considered through the review of the plan are:

- That policies reflect the most up to date national statistics;
- The review and re-establishment of local housing need and supply;
- That reviewed policies reflect the priorities of the One Coventry Plan 2022 – 2030;
- That reviewed policies reflect the priorities of the Climate Change strategy (noting that this is currently at a draft stage and may be subject to change).
- That reviewed policies reflect the priorities of other Council strategies such as the;
- recently adopted Transport Strategy for example, and discussions have been ongoing with a range of council departments in formulating this review – these are reflected in the suite of Topic Papers and other supporting evidence which have informed this stage of the review.

Have your say at [www.coventry.gov.uk/localplanreview](http://www.coventry.gov.uk/localplanreview)

**Ends**

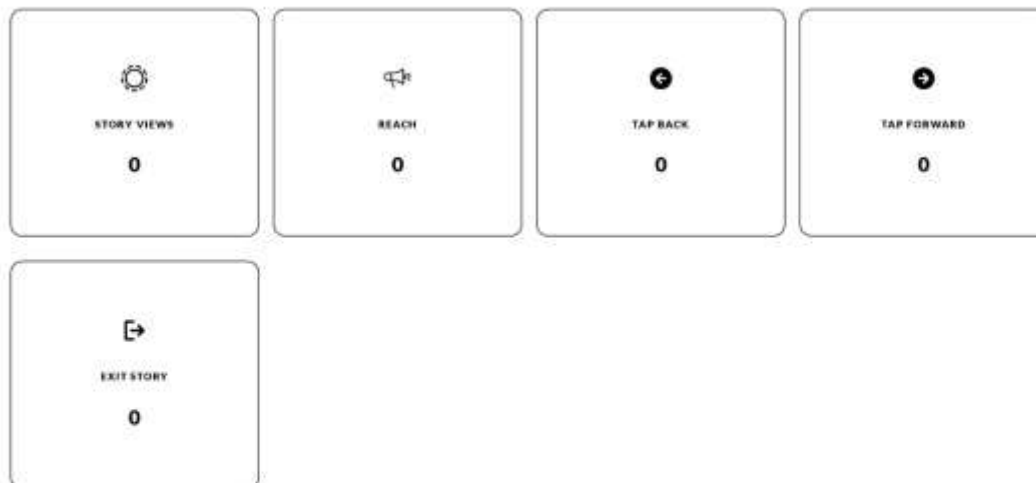
Appendix 3 – Social media analytic report



22/01/2024, 17:19

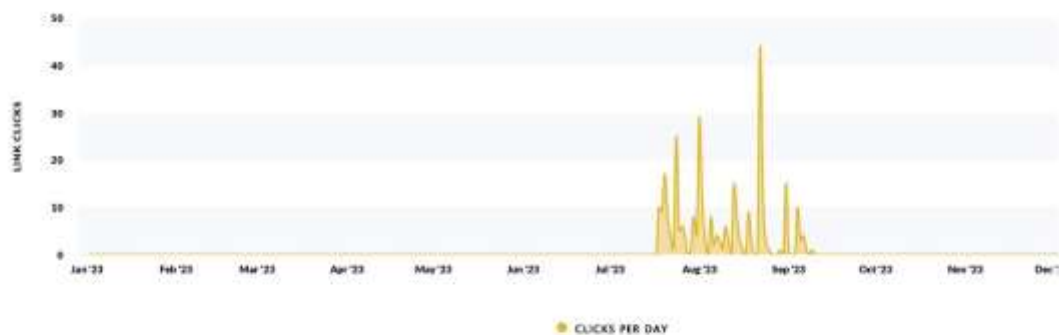
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### Instagram Stories



### Link clicks <sup>1</sup>

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#### Make sure it all clicks into place!

Shorten URLs and get the most accurate reporting by using orlo.uk (unsafe: "http://orlo.uk/") tracking links in your posts! Remember, for Instagram and Youtube, no data will be available as posts on these channels can't contain links

22/01/2024, 17:19

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Global Link Clicks



Locations	
United Kingdom	268
United States	26
Canada	5
Austria	2
Australia	1
Cyprus	1
Greece	1
Iraq	1
Philippines	1

Posts breakdown

Posts by Network

X	15	
Facebook	15	
LinkedIn	2	

f Facebook  
TOTAL REACH

23.2k

in LinkedIn (Video)  
TOTAL REACH

2.8k

22/01/2024, 17:19

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TOTAL COMMENTS

**23**



FROM CUSTOMERS

**30**



TOTAL LIKES

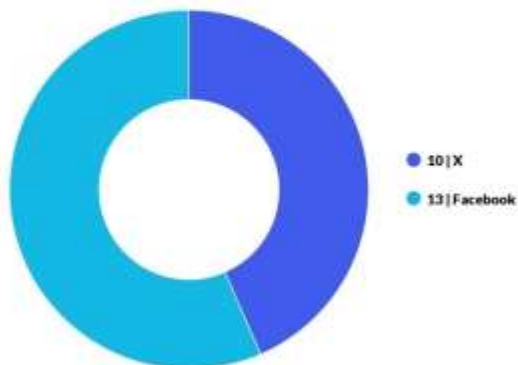
**80**



SHARES / REPOSTS

**44**

Inbound Comments



# Local Plan Review: Issues and Options Consultation

## Regulation 18 – Consultation Statement

22/01/2024, 17:19

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### Top Posts

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#### By Clicks

View post	coventrycc f 22 Aug 2023   09:00		7	4.3K	1
	It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Drop-in to Central Library...		7	4.8K	40
			13	1.39	
			40	9	
View post	coventrycc f 01 Aug 2023   08:10		1	2.4K	2
	It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Have your say at...		3	2.5K	34
			0	1.51	
			34	1	
View post	coventrycc X 30 Jul 2023   06:15		1	1.7K	3
	We have started a consultation seeking views on Coventry's Local Plan policies, including the methodology employed to...		3	1.84	26
			1	1	
			26		
View post	coventry-city-council in 26 Jul 2023   11:00		25	1.3K	
	Curious about the Local Plan review and its significance? We've got you covered! The Coventry Local Plan was adopted in 2017...		5	1.7K	
			0	2.99	
			21	25	
View post	coventrycc f 24 Jul 2023   08:00		1	2.4K	
	With more up-to-date information available to us, we need to update the city's Local Plan policies. Visit <a href="https://orlo.uk/nrrGv...">https://orlo.uk/nrrGv...</a>		1	2.6K	
			0	0.82	
			19	1	
View post	coventrycc X 18 Jul 2023   20:00		2	1.4K	
	The Coventry Local Plan was adopted in 2017 and we now need to review it to make sure our planning policies are up to date. T...		1	1.44	
			1	2	
			16		
View post	coventrycc X 03 Aug 2023   17:10		0	1.1K	
			0	1.49	

<https://www.orlo.app/#analytics/campaign/report?campaignId=45960&startDate=2023-01-02T00:00:00.000Z&endDate=2024-01-22T23:59:59.99...> 5/6



## Local Plan Review: Issues and Options Consultation Regulation 18 – Consultation Statement

22/01/2024, 17:19

Orlo - App



It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Have your say at...



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16

0

View post



coventrycc 04 Sep 2023 | 06:00

It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Drop-in to Cheylesmore Library...



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View post



coventrycc 23 Aug 2023 | 09:30

It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Drop-in to Caludon Library...



1  
1  
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14

1.4K

1.24

1

View post



coventrycc 24 Jul 2023 | 08:00

With more up-to-date information available to us, we need to update the city's Local Plan policies. Visit <https://orlo.uk/4Asq7...>



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<https://www.orlo.app/#/analytics/campaign/report?campaignId=45960&startDate=2023-01-02T00:00:00.000Z&endDate=2024-01-22T23:59:59.99...> 6/6

If you need this information in another format or language  
please contact us

**Telephone: (024) 7683 1109**

**e-mail: [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk)**