

# Coventry Local Plan Review

## Regulation 19

### Proposed Submission (Publication) Stage Representation Form

(guidance note below)

Ref:

(For official use only)

Name of the Plan  
to which this  
representation  
relates:

**Coventry Local Plan Review – Regulation 19 Proposed  
Submission (Publication)**

**Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025** email to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:  
[www.coventry.gov.uk/planningpolicyprivacynotice](http://www.coventry.gov.uk/planningpolicyprivacynotice)

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s).

**Please fill in a separate sheet for each representation you wish to make.**

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## Part A

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### 1. Personal Details\*

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

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mrs"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Lisa"/>	<input type="text" value="Graham"/>
Last Name	<input type="text" value="Hofen"/>	<input type="text" value="Stephens"/>
Job Title	<input type="text" value="Director of Infrastructure Delivery"/>	<input type="text" value="Director"/>
(where relevant)		
Organisation	<input type="text" value="Coventry University Group"/>	<input type="text" value="Stride Treglown"/>
(where relevant)		
Address Line 1	<input type="text" value="Coventry University Enterprises Limited Infrastructure Services"/>	<input type="text" value="Promenade House"/>
Line 2	<input type="text" value="Alma Building"/>	<input type="text" value="The Promenade"/>
Line 3	<input type="text" value="Alma Street"/>	<input type="text" value="Clifton Down"/>
Line 4	<input type="text" value="Coventry"/>	<input type="text" value="Bristol"/>
Post Code	<input type="text" value="CV1 5QA"/>	<input type="text" value="BS8 3NE"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

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

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Name or Organisation:

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

Paragraph  Policy

4. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

### Suggested supportive text for inclusion with the Local Plan prior to a new Policy CC2

Coventry University Group (the University Group) has been one of the fastest growing higher institutions in the Country. Its recent significant investments, and future development ambitions across their extensive City Centre campus are the result of years of successful partnership working between the University Group and the Council: a relationship which both parties wish to develop throughout the Local Plan period. Accommodating ongoing University Group investments plans is a key City Centre objective of the Local Plan and spatial strategy for the area.

According to a recent Economic Impact Assessment report (EclA), data from 2021-22 showed that the University Group generated an annual Gross Value Added (GVA) of c£1bn nationally and had a significant economic impact across the City and sub-region, with around a third of the generated GVA (£320m) benefiting Coventry alone. Moreover, as per the data, 1 in every 20 jobs in the City could be traced back to the presence the University Group and for every 4 direct on-campus jobs, a further 3 were supported across the city.

As such, the University Group is a significant player in the Council's ambition to increase the economic prosperity of the city and region and promote job and employment opportunities within growing sectors.

The Economic Impact Assessment has highlighted the University Group as benefitting from: close partnerships with a range of stakeholders; an open attitude to 'doing things differently'; bringing a trans-disciplinary mindset to tackling socio-economic challenges; and being responsive to local needs through an embedding of the University Group and its estate in the city.

It is recognised that the University Group is actively engaged in academic programmes and research initiatives in support of multiple sectors of activity and it operates in a commercial and competitive UK, and increasingly, global marketplace. Its success, in part, rests on its ability to collaborate with industry, enterprise and the public sector. The range of facilities required to support such a large and rapidly expanding University Group are ever-changing and it not only continues to adapt to changing research and academic requirements, but also responds to new opportunities to accommodate regional, national and international activities which support inward investment and spend within the city.

The University Group is a major landowner within and around the City Centre and has a continued focus on increasing space utilisation for teaching and learning in order to deliver operational efficiencies. This informs the degree to which new buildings are required to meet growth projections and, in turn, facilitate selected redevelopment opportunities for alternative uses across the city centre.

For example, the University Group acquired the former Civic Centre from the Council in 2015, a site offering alternative mixed-use opportunities which align with the wider policy objectives of strengthening the role of the City Centre as a vibrant location to live and work (CC1 Part E). Redevelopment opportunities will be delivered as part of a City Centre 'placemaking agenda', centred on a coherent and deliverable University Campus Masterplan which will have regard to the University Group's Estate Strategy, adopted in 2022.

The University Group developed an up-to-date Travel Plan and Transport Strategy Action Plan in 2023. Working with the Council, the University Group will contribute towards sustainable public realm investments and deliver active travel measures designed to reduce the impact of vehicular traffic within the city centre.

The University Group has innovative and transformational learning and teaching approaches to academic delivery, which impacts upon space needs. The importance of facilitating social and group learning; delivering student (and staff) support services and an increased awareness of a sense of identity for university students continues to shape new initiatives and opportunities. These include the creation of clusters of 'Academic Excellence' where a shared asset culture across general teaching and specialist spaces is being delivered. Changing pressures upon space continue to shape capital projects and maintenance works across the University Group estate.

The creation of the new University Square on the site for the former Alan Barry Building, the completion of Starley Gardens along Cox Street and the new Delia Derbyshire Arts and Society Building represents significant investments by the University Group. Combined, these developments deliver quality academic buildings and public realm enhancements for the City.

By means of a new Campus Masterplan, the University Group will deliver new academic, public realm and commercial development opportunities within its Cathedral Quarter area aligned with adopted Local Plan policies.

The University Groups 8ha Technology Park lies in the south of the City Centre. The University Group will continue to invest in communal amenities and facilities to serve its commercial tenants and look to diversify its tenant mix to reflect changes and growth in new economic and creative industries, including partnerships with public and private organisations.

The retention of university graduates who can make a lasting and positive high-value impact in the city and sub-region represents an important part of the Council's economic strategy. This requires a choice in affordable housing and new housing models, such as co-living and Build to Rent schemes, which reflect a changing socio-economic demographic across the City. Private sector developers have delivered significant Purpose Built Student Accommodation (PBSA) within the City in recent years. The University Group does not anticipate ongoing investment in traditional PBSA, but may wish to deliver specialist new housing approaches, including co-living and built to rent schemes to meet its long-term operational needs.

In terms of its sustainable development objectives, the University Group has secured £13m grant funding to contribute towards a City Centre District Heating network. This will play a role in the University Group's ability to meet Net Zero Carbon ambitions by 2030. Aligned with wider environmental objectives, the Council will require the University Group to contribute towards connecting wider green and blue infrastructure networks as part of an ongoing greening initiative across the City Centre.

The University Group's core estate is located across four defined City Centre Character Areas (Cathedral and Cultural, Civic, Parkside and University and Enterprise). Lying slightly outside this core estate is the Cultural Institute, a £43m joint venture with the Council, in the Mixed-Use Core area and the University Group's Bishop Gate accommodation, which lies in the Northern Regeneration area.

The extent of the University Group's landholding within the City Centre, its economic impact across the sub-region and opportunities to support managed growth through the Local Plan period underpins the need for a bespoke Local Plan policy approach. This approach recognises the educational, commercial, economic, environmental and community benefits which can be unlocked by the University Group working in partnership with the Council through a City Campus Masterplan.

The inclusion of a University Group policy has regard to the provisions of Policy CC1 (Parts A-E) and acknowledges the defined boundary of core University Group land interests and future development ambitions. The Campus Masterplan will contextualise future University Group planning applications and will be kept under annual regular review in collaboration between the Council and University Group. (see also para 8.15 pp83)".

### **Suggested New Policy**

#### **Policy CC2: Coventry University Campus**

##### **Part A: Campus Masterplan**

The Council recognises the role of Coventry University Group (the University Group) in supporting city-wide economic prosperity and promoting job and employment opportunities across the region. The University Group will continue to develop and invest in its city centre campus to maintain their position as one of the fastest growing higher education institutions in the UK.

The University Group will continue to play a role in the wider City Centre placemaking objectives of the Council to strengthen the identity and integration of the University Group within the city. The University Group shall remain committed to the continued investment of its estate portfolio to provide education, research, regeneration, environmental and economic benefits, and ensure the student experience is enhanced through a well-managed, high-quality and adaptable portfolio of buildings and spaces.

In collaboration with the Council, the University Group will prepare a Campus Masterplan which will capture academic and University Group- initiated alternative use redevelopment opportunities. The Masterplan will demonstrate how proposals will lead to cohesive integration within the City Centre. The Masterplan will help contextualise future planning applications submitted by the University Group over the life of the Local Plan period and will support the development strategy set out in Policy CC1 (Part A).

#### **Part B: Development principles within the Campus Masterplan Area**

Planning applications submitted by the University Group within the Campus Masterplan area shall be determined in accordance with the provisions of Policy CC1 (Parts A-E) and the following development principles:

- a) Integrate University Group operations within the fabric of City Centre;
- b) Strengthen safe and legible pedestrian and cycling connections between each character area where the University Group has a presence;
- c) Incorporate facilities and the infrastructure required to support the new academic, research, commercial and ancillary developments;
- d) Deliver biodiversity net gains (including new habitats) as part of a City Centre greening strategy; and,
- e) Support the delivery of other planning objectives for the area in which it is proposed.

Where land and/or buildings are released for alternative (non-University Group) uses, development proposals will be supported where they demonstrate the contribution the scheme will make towards employment, health, community and city-centre residential-led mixed-use proposals (as appropriate) in accordance with other policies of the Local Plan.

University Group proposals for specialist housing schemes will be acceptable where they are in compliance with Policies H12 and H13 of this Plan.

**Coventry  
University Group  
Campus: Suggested  
(Core) Policy Area**

- ① Core Masterplan  
Area: Policy CC2
- ② Cultural Institute (for  
reference purposes  
only)
- ③ Bishops Gate (for  
reference purposes  
only)



**STRIDE TREGLOWN  
TOWN PLANNING**

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

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This representation is in the interests of creating a positive, justified, effective and deliverable plan. Coventry University Group (CUG) requests a new policy and associated supportive text, as outlined above, is inserted after Policy CCC1 (Parts A-E) on page 173.

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

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

Paragraph

N/A

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

N/A

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

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

Coventry University Group (CUG) has submitted multiple responses to various parts of the Regulation 19 Local Plan Review. Its primary interest is to ensure the Local Plan reflects the long term development ambition of CUG and its ability to unlock education, commercial, R&D, community and other benefits through continued investment across its estate. CUG wishes to participate in hearing discussions to ensure appropriate acknowledgement is given to the University Group's notable impact on the City Centre and wider sub-region. The University Group's primary objective is to secure a new City Centre Policy (CC2) and supportive text as captured in the representation.

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

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

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Name or Organisation:

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

Paragraph  Policy

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(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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As a formal Partner and member of the One Coventry Board, the University Group supports the contextual references to One Coventry Plan 2022-2030. It is suggested that greater emphasis might be placed on the scale and positive impact of the University Group on adult learning in the city and region as reflected in pages 9 and 10 of the One Coventry Plan: the University Group retains a significant role in delivering the positive outcomes listed linked to a stronger economy. As a major player delivering the development ambitions of the City Centre, the University Group supports partnership working with the Council in a way which will help deliver its academic, research and pastoral care of its students over the life of the Local Plan Review period.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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No modifications are sought. This representation is made in the interests of creating a positive, justified and effective plan which recognises effective and positive collaboration between parties to deliver successful outcomes.

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**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

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

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Name or Organisation:

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Paragraph  Policy

2. Do you consider the Local Plan Review is:

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The University Group supports the policy intent of the replacement Local Plan to address wide-ranging issues linked to climate change as set out in Table 2.1 (pp9-12).

The University Group responded to the Coventry City Council Climate Change / Sustainability Consultation exercise in May 2023. That representation expanded upon the approach taken by the University Group, referencing issues such as the Green Flag International Award, National Transport Design (Research) Centre, the University Group's Centre for Agroecology, Water and Resilience, the Centre for Trust, Peace and Social Relations, the development of a National Skills Hub aimed at supporting Power Electronics, and strategic partnerships such as with Jaguar Land Rover to develop pilot training schemes to upskill 1,200 engineers linked to electric vehicle development.

The May 2023 representation confirmed that the University Group considered the Council's draft Sustainability Strategy to be a good start in tackling climate change. The University Group agreed with the main pathways identified and that they cover the key areas for tackling climate change. Support was offered in relation to the identification of skills within the strategy as being a key factor in establishing Coventry as a green leader. The University Group welcomed the opportunity of working with the Council to tackle climate change in Coventry and promoting the city as a green healthy place to live, study and work.

The University Group wishes to work with the Council and share the emergence of Sustainable Development and Movement Principles being generated by the University Group.

The University Group is committed to reduce carbon emissions, increase recycling and reduce waste, enable sustainable decisions to be embedded within procurement strategies and ensure impacts are legally compliant.

The University Group has developed an up-to-date Travel Plan and Transport Strategy Action Plan in 2023. These align with the key objectives of consolidating initiatives and streamlining Travel Plan coordination duties.

Linked to wider space utilisation, estate optimisation strategy, Building Condition Surveys and Remedial Works Programme, the University Group is developing a Decarbonisation Strategy across its Estate. This will develop previous thinking as captured in its Sustainability (Climate Change Commitments) Strategy.

The University Group will wish to work with the Council to share best practice in monitoring and implementing effective sustainable principles across the City. Collaborative working in developing policy and knowledge exchange in relation to initiatives such as renewable energy priorities and promoting of EV charging and heat networks is supported.

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No modifications are sought. This representation is made in the interests of creating a positive, justified and effective plan, and to seek ongoing collaboration with the Council to share best practice and promote joint initiative, while potentially benefitting from academic research undertaken locally.

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

Paragraph

N/A

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The University Group is committed to continual investment in its estate to address the pressures placed upon it by changing student cohorts, societal pressures to activate new academic programmes, and the ongoing transformation in the way it delivers through pedagogical changes.

In terms of the wider growth agenda, the University Group wishes to stress that introducing new commercial uses in support of positive placemaking objectives across its City Centre estate remains of interest. The University Group operates in a commercial and competitive UK and increasingly global marketplace and its success in part rests on its ability to collaborate with industry, enterprise and public sector partners.

The University Group will continue to work with the City Council to positively and appropriately plan for the incorporation of viable, sympathetic and complementary uses within the City Centre

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soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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References in the Local Plan to the Duty to Co-operate should explicitly include the varied interests of the University Group. The University Group operates within the confines of Coventry City Council and has a presence at Ryton Gardens in the neighbouring Rugby Borough Council. The University Group's Estate Strategy captures estate optimisation and decarbonisation and could result in cross-boundary opportunities linked to renewable energy generation, job generation and carbon offsetting. The wider benefits arising from cross-boundary proposals should be accepted and encouraged within the Local Plan, alongside the opportunities for three-way discussions between the University Group and the two Councils where this would be beneficial to the interests of all parties.

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Paragraph  Policy

2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

The University Group has reviewed the Reg 19 Local Plan. Rather than support a University Group Masterplan within Policy DS4, it considers an alternative suggested policy aimed at the University Group Campus is included as a new Policy CC2 within the City Centre Chapter. Accepting that major employment opportunities at JLR are to be addressed by the Policy, the policy is principally aimed at sustainable urban extensions, where comprehensive masterplanning is encouraged.

A focus on the University Group Campus in the City Centre is advocated by references at paragraphs 6.47, 8.15 and Policy CO1. While it is justified to define the extent of the City Centre Campus in the Plan, not all University Group assets will be subject to major interventions. Referencing connected “mini-masterplans” for defined University Group areas within the City Centre (such as The Cathedral Quarter and Civic Centre) will result a positively crafted and justified Local Plan. This approach would ensure that appropriate clarity and importance is placed upon the role that University Group Masterplan(s) can continue to play to deliver positive outcomes linked to education, employment, connectivity, sustainable development objectives, student and staff wellbeing, social infrastructure generally, public realm improvements and the greening of the urban environment.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No modifications are sought. This representation is made in the interests of supporting a positive, justified and effective plan. In this context, the change to the Plan is not linked to Policy DS4 but via a new Local Plan Policy in Chapter 14.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

Coventry University Group (CUG) has submitted multiple responses to various parts of the Regulation 19 Local Plan Review. Its primary interest is to ensure the Local Plan reflects the long term development ambition of CUG and its ability to unlock education, commercial, R&D, community and other benefits through continued investment across its estate. CUG wishes to participate in hearing discussions to ensure appropriate acknowledgement is given to the University Group's notable impact on the City Centre and wider sub-region. The University Group's primary objective is to secure a new City Centre Policy (CC2) and supportive text as captured in the representation.

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.***



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

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Name or Organisation:

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

Paragraph  Policy

2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

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The University Group acknowledges that the City Council is seeking to reduce the differences in health inequalities and health outcomes that exist in the City and improve the wellbeing and life changes for residents. Through its Research Institute for Health and Wellbeing, the University Group already does a lot of work with the City Council addressing health inequalities. The University Group has secured funding from NIHR for a collaboration led by Coventry City Council in partnership with UHCW, Warwick University and UCL.

In accordance with the Marmot Principles referenced on Page 25 of the Submission Draft, the University Group runs a well-regarded Health and Life Sciences Faculty and is engaged in multiple research initiatives in the field of health inequalities and health outcomes. Subject to issues of commercial or other confidentiality, the University Group would be keen to investigate health-based knowledge transfer sessions with the Council to ascertain the degree to which collaborative work could feed into the evidence base for the Local Plan Review. The University Group will endeavour to review the inter-relationships between Active Travel and Health (physical and mental) benefits generated by their support for sustainable and active travel initiatives and programmes.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No modifications are sought. This representation is made in the interests of supporting a positive, justified and effective plan. To seek ongoing collaboration with the Council to share best practice and promote joint initiative, while potentially benefitting from academic research undertaken locally.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Paragraph

N/A

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Coventry University Group (CUG) has submitted multiple responses to various parts of the Regulation 19 Local Plan Review. Its primary interest is to ensure the Local Plan reflects the long term development ambition of CUG and its ability to unlock education, commercial, R&D, community and other benefits through continued investment across its estate. CUG wishes to participate in hearing discussions to ensure appropriate acknowledgement is given to the University Group's notable impact on the City Centre and wider sub-region. The University Group's primary objective is to secure a new City Centre Policy (CC2) and supportive text as captured in the representation.

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

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Name or Organisation:

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

Paragraph  Policy

2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

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Notwithstanding comments made in relation to the supportive text of Policy HW1, the University Group wishes to **object** to the current drafting on the grounds that the scope of future Health Impact Assessments is not sufficiently clear to enable applicants to invest time in their preparation without knowing whether these are fit for purpose and will meet updated validation requirements. The current HIA SPD is referenced in the November 2024 Health Background Paper but is undated, appears to have been prepared just after April 2017 and refers to a previous NPPF iteration. While it is acknowledged that the Council will update the Health Impact Assessment SPD to provide guidance, the University Group considers that this is required to sit along Policy HW1 and should be in place by the time of adoption (with adequate time for consultation to be held to inform its content).

While the University Group observe that the HIA SPD is a helpful reference point, it considers that it would be appropriate and prudent to capture the **principles** of health and wellbeing as part of an outline application, with detail supplied as part of Reserved Matters submissions – similar to the way in which a baseline Travel Plan established at outline stage is developed once an occupier is known. The use of pre-occupation conditions would be appropriate in relation to HIAs.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

While the University Group observe that the HIA SPD is a helpful reference point, it considers that it would be appropriate and prudent to capture the **principles** of health and wellbeing as part of an outline application, with detail supplied as part of Reserved Matters submissions – similar to the way in which a baseline Travel Plan established at outline stage is developed once an occupier is known. The use of pre-occupation conditions would be appropriate in relation to HIAs.

This representation is made in the interests of producing a sound plan which references up to date evidence and source data as to the implementation of policy and offering clarity as to the up-to-date requirements of submitting a HIA in support of a planning application.

***Please note:*** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Paragraph

N/A

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

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

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Name or Organisation:

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Paragraph  Policy

2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

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The University Group supports the Council's ambition to increase the economic prosperity of the city and region and promote job and employment opportunities within the growing sectors. The University Group is actively engaged in academic programmes and research initiatives in support of many of these and is seen as a key engine for growth for the City and wider region. In this regard, the University Group is referenced in a positive light throughout the 2017 Adopted Local Plan, with Policy CC24 of the City Centre Action Plan reflecting the ambition of the University Group at that time.

The University Group is operating in an increasingly competitive arena, and ongoing investment is required to ensure that it can continue to shape and influence a global economy and higher education sector. As such, the University Group would like to see the Local Plan explicitly support its R&D endeavour in and around the City Centre via a combination of refurbishment, re-purposing and potentially new build facilities in accordance with its Estate Strategy and growth ambitions.

The positive economic impact of the University Group's operations across the City is captured in the proposed new Policy CC2 – "Coventry University Group" elsewhere in this representation. The University Group's annual GVA of £1bn nationally and £320m locally deserves explicit reference in the preamble to Policy JE1.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The University Group would like to see the Local Plan explicitly support its R&D endeavour in and around the City Centre via a combination of refurbishment, re-purposing and potentially new build facilities in accordance with its Estate Strategy and growth ambitions.

The positive economic impact of the University Group’s operations across the City is captured in the proposed new Policy CC2 – “Coventry University Group” elsewhere in this representation. The University Group’s annual GVA of £1bn nationally and £320m locally deserves explicit reference in the preamble to Policy JE1.

This representation is made in the interests of supporting a positive, justified and effective plan, which acknowledges the impact of key organisations and delivery partners across the City

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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x

**Yes**, I wish to participate in hearing session(s)



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Paragraph  Policy

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Opportunities exist to release University Group controlled land assets for alternative uses at the periphery of the “academic” estate. Such opportunities could contribute towards wider Council redevelopment ambitions in the area, including commercial uses such as a hotel, residential, small scale retail and partnership building(s) which could offer wider public sector and quasi-community uses.

At this time, the University Group is unable to define a particular proposal sufficient to submit under a call for sites request, however will maintain a dialogue with the Council over its proposals in this, and other areas, as appropriate and aligned with the University Group’s Adopted Estate Strategy.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation suggests background text to offer clarity as to the development ambition of the University Group in bringing forward mixed use development proposals within the City Centre (Civic Centre site) over the life of the Local Plan.

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

Paragraph

N/A

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

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***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

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Name or Organisation:

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

Paragraph  Policy

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

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The University Group acknowledges the importance of R&D uses, such as laboratories linked to universities, and would be willing to share information as to the University Group's continuing interests in R&D distribution and facilities across its estate. The repurposing and/or redevelopment of R&D facilities controlled by the University Group requires a degree of flexibility during the Local Plan period: policies which artificially protect R&D uses on defined University Group controlled sites would not be supported as such a policy could be applied to prevent alternative uses in accordance with the needs of the University Group and the delivery of its Adopted Estate Strategy, and wider City Centre policy objectives.

By way of example, the range of facilities which are required to support a large university are changing as expectations increase over the need to accommodate regional, national and international conferences, symposiums and exhibitions. These requirements make a positive contribution towards the local economy as well as an increasingly important income stream for the university. Facilities which support conferencing within the City Centre will be captured in site specific masterplans and proposals to be led by the University Group. The operational advantages of supporting conferences may outweigh the benefits of retaining employment and/or quasi R&D activities within the University Group's Technology Park.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation is made in the interests of positive and effective planning, reference to CC1 should be included within the supporting policy text to JE8 and/or within Policy JE8 Part 2 sub-section d.

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Opportunities exist to release University Group controlled land assets for alternative uses at the periphery of the “academic” estate. Such opportunities could contribute towards wider Council redevelopment ambitions in the area, including residential city-living schemes on surplus land assets. The University Group wishes that Table 6.2 include reference to the refurbishment of Priory Halls (Block H) and redevelopment of the adjacent Priory Street blocks for a residential led scheme with active ground floor uses. The University Group is investigating opportunities to bring forward such proposals as part of its Cathedral Quarter Masterplan (part of the wider Campus Masterplan approach advocated by new Policy CC2) for alternative uses.

In relation to the opportunities presented by the redevelopment of the former Civic Centre Site, the residential capacity of the site has not yet been confirmed.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



The University Group wishes that Table 6.2 include reference to the refurbishment of Priory Halls (Block H) and redevelopment of the adjacent Priory Street blocks for a residential led scheme with active ground floor uses. The University Group is investigating opportunities to bring forward such proposals as part of its Cathedral Quarter Masterplan (part of the wider Campus Masterplan approach advocated by new Policy CC2) for alternative uses.

This representation is made in the interests of supporting a positive, justified and effective (deliverable) plan. The representation also presents as background evidence the opportunity to capture this redevelopment area within future annual SHLAA updates / Register of Brownfield Sites to underpin future housing supply.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Paragraph

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In relation to accommodating the growth ambition of the University Group, the policy framework relating to student accommodation is likely to change. Since the substantive drafting of the Draft Local Plan prior to its Adoption in December 2017, the number of Purpose-Built Student Accommodation (PBSA) study bedrooms in and around the City Centre has been significant. The University Group acknowledges that the importance of catering for young people and professionals (including graduate recruitment) is referenced in paras 3.1, 6.27, 6.55 and 6.59 of the Reg 19 Local Plan.

The University Group will be pleased to share its current views on student accommodation distribution and delivery within the City, and to work with the Council to investigate opportunities for new forms and models of accommodation to come forward which address the needs of its students and staff. New business models could include Co-living and Build to Rent accommodation managed by the University Group. These would not specifically be models available to non-university stakeholders and therefore not related to general housing growth but meeting a changing need in a particular and defined housing group (in this case, Students and visiting University Group staff).

The University Group therefore encourages the City Council to adopt the same principles to PBSA controlled under new occupational models – such as Co-living and Build to Rent, where the accommodation is controlled and managed by the University Group.

The University Group therefore supports a more nuanced approach which allows university controlled student and staff accommodation to be considered on its merits and where there is a clear demonstrable need at the time of any formal planning application: the University Group is unlikely to continue to compete in a competitive private sector dominated PBSA market when it is seeking to deliver bespoke solutions to its students and staff. However, the University Group needs to be agile and flexible in its approach over a long time frame, such as the lifetime of the Local Plan, as a response to future market forces or other external factors may be required.

The reference to “directly accessible” requires clarification. In this regard, consideration should be given to a defined University Campus Masterplan area (see suggested Policy CC2). This would also enable the University Group to develop its masterplan ambitions within such a defined area which would align with the initiatives generated by the Adopted Estate Strategy: the Masterplan being developed in collaboration with the City Council as referenced in para 8.15 and Policy CO1 (pp83 – 84).

The University Group understands that the City Council commissioned a PBSA Study in 2024 and that Policy H10 draws upon the findings of the same. In this context, the University Group remains committed to ensure that all students are provided with the highest quality PBSA within the City. The potential for growth and development of PBSA will be monitored and the University Group will maintain dialogue with CCC as the needs develop.

In line with responses presented elsewhere within this representation, the University Group would be keen to explore opportunities with the Council to inform a Council controlled monitor and manage approach to PBSA (including new models of university managed accommodation such as Co-living or Built to Rent). This will enable the Council to recognise the University Group’s growth plans and ambitions whilst ensuring that this does not undermine the Council's strategy to achieve a balanced housing market.

The University Group is prepared to share information relating to student accommodation surveys and management arrangements run by FutureLets, the commercial arm of the University Group responsible for its controlled accommodation. The analysis undertaken by the University Group will help evidence ongoing demand for university-controlled accommodation and the reasons why students might seek private sector accommodation in the City: including preferences and bespoke needs associated with short-term duration leases.

The ANUK Code and UUK Code of Practice provide clear guidelines on the safe and effective management of buildings, which could be considered by the council as many of these points support the delivery of inclusive, and safe communities. It is important that buildings are effectively managed with 24/7 support for students to ensure that buildings are safe and students have a point of contact throughout the day. Shared spaces to study, relax and spend time away from a flat or studio and access to outside space are equally important in buildings to support these communities and it is expected that amenities such as laundry are included in the design as standard, with many PBSA accommodation buildings also providing gyms, and workout spaces.

There has been an increase of students with dependants requiring accommodation which is not met through PBSA accommodation. Consideration of the effect of partially occupied buildings in the city should form part of the evidence base to inform policy. The University Group considers that it is better to have full vibrant buildings with a strong sense of community and a positive environment or dual occupancy buildings where there are both young professionals and students occupying. How this impacts each group and their requirements on the space and use

of the building, particularly in relation to the shared community spaces can be both a design and management challenge.

Warwick and Coventry students currently both occupy spaces in the city. With a policy emphasis towards 'located next to the edge of campus' this could impact on scheme viability and occupancy levels. Affordability is key to many students and the University Group is now starting to see a drop in prices and increase in offers to students to secure accommodation which makes PBSA accommodation more affordable. However, this does need to be balanced with the quality of the accommodation and how the buildings are managed and students supported.

Reasonable adjustments and the mix of accommodation needs will always be considered in any PBSA scheme, or other approach to support the needs of the emerging and changing Student population supported by the University Group. It is important that the needs of graduates / young professionals wishing to remain in the City after attending university are supported by appropriate and flexible accommodation models. This is a One Coventry Objective.

There also needs to be greater collaboration between the Council and public transport operators to support accessibility provision to PBSA schemes. The Council has often collected developer contributions arising from PBSA and there needs to be greater transparency of scheme delivery to improve active travel connectivity to these sites.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The University Group therefore supports a more nuanced approach which allows university controlled student and staff accommodation to be considered on its merits and where there is a clear demonstrable need at the time of any formal planning application: the University Group is unlikely to continue to compete in a competitive private sector dominated PBSA market when it is seeking to deliver bespoke solutions to its students and staff.

This representation is made in the interests supporting a positive, justified, effective and responsive plan. In this instance, the representation targets greater flexibility in relation to Build to Rent and Co-Living rather under Policies H12 and H13. The representation supports ongoing discussions between the University Group and Council to better inform the evolution of Local Plan policy in relation to student needs and management regimes across the City.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

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

Coventry University Group (CUG) has submitted multiple responses to various parts of the Regulation 19 Local Plan Review. Its primary interest is to ensure the Local Plan reflects the long term development ambition of CUG and its ability to unlock education, commercial, R&D, community and other benefits through continued investment across its estate. CUG wishes to participate in hearing discussions to ensure appropriate acknowledgement is given to the University Group's notable impact on the City Centre and wider sub-region. The University Group's primary objective is to secure a new City Centre Policy (CC2) and supportive text as captured in the representation.

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

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

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Name or Organisation:

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

Paragraph  Policy

2. Do you consider the Local Plan Review is:

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

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In order to accurately cross-reference the suggested new Policy CC2 as advocated by the University Group, para 6.44 should refer to the introduction of a Policy CC2 and the associated defined boundary of the University Group Campus. The extent of the University Group's landholding extends beyond the University and Enterprise character area of the City Centre.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to accurately cross-reference the suggested new Policy CC2 as advocated by the University Group, para 6.44 should refer to the introduction of a Policy CC2 and the associated defined boundary of the University Group Campus. The extent of the University Group's landholding extends beyond the University and Enterprise character area of the City Centre.

This representation is made to accurately reference appropriate defined masterplan / policy areas to deliver a positive, justifiable and effective Local Plan policy framework.

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Paragraph

N/A

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

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

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Name or Organisation:

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Paragraph  Policy

2. Do you consider the Local Plan Review is:

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(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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As referenced elsewhere in the University's representation to the Reg 19 Submission Plan, the University Group is developing its long-term strategy for student accommodation. The growth in private sector PBSA delivery in recent years has influenced the direction of travel and the University Group is considering new models which offer a differentiated approach to meeting the needs of both domestic and international students and staff.

Options for future delivery of university-controlled accommodation are likely to be focused on non-traditional models, including co-living and Build to Rent alternatives. A University Group co-living or Build to Rent model will not be managed within the standard "open market" parameters of three or more years tenancies, but on one or more academic semesters or on a short-term basis for visiting students or staff. As such, the University Group **objects** to the current drafting of Policy H12 1e. Greater flexibility should be accommodated within the provisions of the policy: the University's objection will be withdrawn if the words "Unless controlled by Coventry University Group," are inserted at the start of sub-section e.

The details of such a bespoke University Build to Rent model are yet to be determined or finalised, however flexibility is the key to enable the University Group to meet the bespoke needs of individuals under their pastoral care. As such, the University Group would wish to engage with the Council to discuss future options linked to bespoke accommodation needs in a way which can continue to be controlled by the University Group and in a manner where such

accommodation does not form part of the traditional housing delivery targets set by Government.

Whereas the Reg 18 Issues and Options Consultation Draft Local Plan referenced the opportunities for Co-Living and Build to Rent being part of the solution which retains graduates in the City and delivers homes for the younger generation, this has been omitted in the Reg 19 text. The University Group **objects** to the current drafting and requests that this is re-inserted into the supporting text of Policy H12 and H13. The University Group is therefore requesting that the City Council looks to a more flexible arrangement, where such accommodation is available and part of the transient student needs during their studies, and where visiting staff/lecturers can take advantage of short-term University Group controlled accommodation where pastoral care is provided by their employer: as a permanent, responsible organisation which has a long-term duty of care over its student (and staff) within controlled accommodation, management safeguards are in place to ensure appropriate living standards and pastoral care is available.

The University Group would welcome a conversation with the City Council to discuss and receive clarification on how the council reached the conclusion that the University Group (Coventry University) has a low graduate retention rate in the city. Discussions on this topic extend wider than the consultation on the Local Plan and as such separate engagement on this topic would be helpful.

The University Group is keen to explore opportunities for bespoke Co-Living or bespoke Build to Rent schemes specifically for the needs of university students (and staff). The repurposing and/or redevelopment of one or more sites within the University Group estate may be explored during the drafting of the Local Plan and ongoing engagement with the Council is supported in this context. Redevelopment of a University Group controlled site could likely result in relocations of academic or R&D uses elsewhere within the estate.

The University Group acknowledges that the Local Plan states (para 6.70) that student accommodation is the most comparable residential model to co-living: it is for this reason that the University Group are keen to explore co-living models to meet specialist student, staff and researcher requirements over the life of the Local Plan as an alternative to traditional private sector PBSA schemes across the City Centre. The reference to a minimum of three month tenancies would broadly equate to a university semester, and therefore provides a sound basis for occupation.

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The University Group is therefore requesting that the City Council looks to a more flexible arrangement, where such accommodation is available and part of the transient student needs during their studies, and where visiting staff/lecturers can take advantage of short-term University Group controlled accommodation where pastoral care is provided by their employer: as a permanent, responsible organisation which has a long-term duty of care over its student (and staff) within

controlled accommodation, management safeguards are in place to ensure appropriate living standards and pastoral care is available.

This representation is in the interests of supporting a positive, justified, effective and responsive plan. The suggested approach offers a tailored policy solution to address socio-demographic pressures and the opportunities to meet specialist housing needs through university controlled new housing models. To seek ongoing collaboration with the Council to share best practice while potentially benefitting from empirical research undertaken locally by the University Group.

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Paragraph

N/A

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

N/A

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

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Name or Organisation:

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Paragraph  Policy

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

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In relation to retail uses within City Centre frontages, this policy is relevant to the University Group only in the context that it has delivered a number of ground floor active retail (food and beverage uses) within its estate. While these are technically not part of defined retail frontages, the University Group currently controls and could support further sui generis uses within this estate: these would tend to be part of refurbished or mixed use academic or student support buildings and could include uses such as cafes, licensed premises, hot food units and performance venues. Such uses will be included within a building linked to demonstrable need (deficiency in provision generated by survey results for example) or as part of a repurposing strategy for a building or buildings linked to the Campus Masterplan. The acknowledgement that the integration of the University Group (and by implication, its ancillary facilities) are referenced within Policy R2 is supported.

Notwithstanding this, Policy R2 appears to replicate a significant proportion of Policy CC1 and therefore it is suggested that Policy R2 should focus on defined retail frontages and corridors within the central retail hub of the City Centre, rather than cover wider aspects of development as covered by Policy CC1.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy R2 appears to replicate a significant proportion of Policy CC1 and therefore it is suggested that Policy R2 should focus on defined retail frontages and corridors within the central retail hub of the City Centre, rather than cover wider aspects of development as covered by Policy CC1.

This representation is in the interests of supporting a justified and effective plan which offers clarity as to the relationship between similar policy approaches (CC1 and R2).

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The preamble to Policy CO1 makes passing reference to the University Group in para 8.15. This general statement acknowledges that *“the Council will continue to work with both universities to enable on-going development of their masterplans”*. The reference to University Group Masterplans in Policy CO1.3 is also supported. These key principles support, and justify (in part) the suggestion made by the University Group to suggest a new Policy CC2 Coventry University Group Campus as part of the suite of City Centre policies of the Local Plan.

The University Group **objects** to the wording in para 8.21. Such an objection would be removed if the Council were to amend the word “education” with the word “school”: the second part of a paragraph referring to the delivery of school places.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The University Group **objects** to the wording in para 8.21. Such an objection would be removed if the Council were to amend the word “education” with the word “school”: the second part of a paragraph referring to the delivery of school places.

This representation is in the interests of supporting a positive, justified and effective plan which offers clarity as to the positive impacts generated by utilising and unlocking the potential of the University’s estate within the City Centre (cross reference to CC1 and new Policy CC2 is advocated).

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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

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Name or Organisation:

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The University Group supports the City Council in its approach to embrace “Green and Blue Infrastructure” policies and provisions in the Local Plan review.

The University Group supports Local Plan Policy GE1 (part 5) and Policy EM4 (Part 10) to de-culvert hidden watercourses across the City Centre in order to add new integrated landscape, waterscape and biodiversity enhancements across the City. Opportunities to fund such proposals are likely to be afforded by the development of higher density urban living proposals which are likely to include Council owned assets. Such proposals would change the character of existing areas and support a balanced approach which invests in public realm and supports civic pride. The University Group will work with the City Council to ensure that connections between such areas and other parts of the City can be achieved across its estate, together with the strengthening and linking of green and blue networks.

The University Group considers that explicit reference should be made within Policy GE1 to supporting a Green and Blue Environmental Agenda when reviewing the future of major thoroughfares in the City, particularly those no longer required to carry high levels of vehicle movements the result of re-routing proposals and schemes to support active and sustainable transport. A specific policy which captures the intent to deliver public realm changes along Cox Street should be captured in the Local Plan, reflecting previous urban greening proposals.

Opportunities along Cox Street and Fairfax Street (as advocated by Policy EM4 (Part 10)) would align with and generate additional positive public realm, air quality, noise quality and biodiversity gains to supplement the positive outcomes generated by the recent and ongoing University Group investment in Starley Gardens and the University Square area. Re-routing of vehicles to the north of the Code PBSA scheme and using Cope Street as part of a remodelled one-way public transport route offers the chance to remove vehicles from that part of Fairfax Street fronting the Leisure Centre site.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The University Group considers that explicit reference should be made within Policy GE1 to supporting a Green and Blue Environmental Agenda when reviewing the future of major thoroughfares in the City, particularly those no longer required to carry high levels of vehicle movements the result of re-routing proposals and schemes to support active and sustainable transport. A specific policy which captures the intent to deliver public realm changes along Cox Street should be captured in the Local Plan, reflecting previous urban greening proposals.

This representation is in the interests of supporting a positive, justified and effective plan which offers clarity as to the positive impacts generated by utilising and unlocking the potential of a traffic reduction strategy (as advocated throughout Chapter 12) and particularly involving roads which align with low level culverts.

***Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.***

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

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Name or Organisation:

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

Paragraph  Policy

2. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

It is important to acknowledge that that the University Group has invested considerable sums across the City Centre in recent years. Significant financial sums have been invested in enhancements to the public realm- notably Starley Gardens and University Square. The public realm enhancements might be considered part of the “glue” that binds the various University Group’s assets into a functional whole, but the investment made by the University Group is not within a closed campus – the benefits of the investment made is experienced by users of the City Centre irrespective of whether they have a connection to the university as an academic institution.

The ongoing investment in the public estate as part of a robust and essential “placemaking agenda” is critical to secure the wider planning objectives of the Council and expectations of Coventry residents. The connections between destinations across the University Group’s Estate should be continued and developed, alongside opportunities to deliver enhanced cycling, pedestrian and public transport which reduces the dominance of the car within the Inner Ring Round boundary.

The University Group therefore welcomes that the Local Plan recognises the importance of green space in the city and wishes to investigate the possibilities of increasing standards for green infrastructure and biodiversity. Using both the Green Flag international Award criteria and Natural England’s Green Infrastructure Framework (GIF) could provide the tools to support the

Council's aspirations. The balance between nurturing green and blue infrastructure initiatives and meeting the space (building) needs of the University Group can be progressed through a University Campus Masterplan developed in collaboration with the Council's own plans for areas adjacent to the University Group's Estate.

The University Group acknowledges the partnership approach it has taken with the City Council in relation to the activities of the Centre for Agroecology and Water Resilience (CAWR). Through its focus on food and water, the Centre's research develops and integrates new knowledge in social, agroecological, hydrological and environmental processes, as well as the pivotal role that communities play in developing resilience. Reference to this as an example of positive collaboration between local organisations is encouraged through references in the support text of relevant local plan policies.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



☐

**No**, I do not wish to participate in hearing session(s)

☒

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

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Name or Organisation:

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

Paragraph  Policy

2. Do you consider the Local Plan Review is:

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(2) Sound	Yes	<input type="text" value="x"/>	No	<input type="text"/>
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The University Group is disappointed that references and proposals cited at the time of the 2023 Issues and Options Consultation draft that Policy DE1 consider the implications arising from a growing younger age profile is not carried across to the Reg 19 Draft. In this regard, the managed growth of the University Group, in addition to the underlying population, offers opportunities for a larger younger population to live, study, work and play in the City. This issue is linked to the bespoke housing needs of students and young professionals and therefore underpins the need to consider alternative models of affordable housing such as co-living and Build to Rent.

The observation is made that the opening paragraph of the policy cites that “*All development proposals should follow a design-led approach to deliver sustainable, high quality placemaking*”. The University Group suggests that clarification should be made that this reference can include both building design and/or landscape led design principles from the outset, depending on the circumstances of the project.

The 2023 Reg 18 Issue and Options Consultation suggestion to include wording within Policy DE1 (3) (b) “*to promote ‘responsive architectural innovation’ that would encourage developments to advance a new period of the City’s legacy of architectural innovation to reinforce Coventry’s identity as a city for built environment innovation*” has not been carried

forward into Reg 19 draft. The University Group objects to this omission and seeks its reinstatement as part of an innovative and positive design-based policy.

In this regard, consultants appointed by the University Group to progress concept masterplan ideas within its Cathedral Quarter has researched the modernism development principles embedded in the 1950's and 1960's. It is important to note that the economic life of buildings erected in this period was assumed to be 60-70 years, therefore the propensity of certain buildings to be viably retained during the life of the Local Plan Review will reduce over time. The University Group is keen to be part of the delivery of a new legacy of built form in a manner that preserves elements of the modernist ideologies of the past.

The University Group considers that there are important aspects of the 1950-60's vision that remain valid in 2025 and which can be adapted to meet the contemporary needs of the City and the University. These are:

- Setting buildings into the established green landscape.
- Using clean, simple and crisp building forms.
- Strategically using height in a small number of key buildings.
- Working to the established grid that aligns with Cox Steet and Cope Street (within the University Quarter).

The University Group is keen further explore these opportunities in relation to the design and delivery of its development ambition including:

- Improving the sense of place with better natural wayfinding throughout the University Group Estate and stronger view corridors between key spaces and features.
- Making more of the rich landscape by stitching together all of the established green pockets throughout and beyond the University Group estate to create a more seamless park setting in which individual buildings are located.
- Improving the active travel infrastructure and connectivity of the University Group Campus through the provision of new high-quality walking and cycling facilities.
- Consideration as to how new micro-mobility and emerging zero carbon transport can be safely incorporated into the design and delivery of new developments and spaces.
- How proposals for the Civic Centre can supplement its wider development ambition alongside opportunities to work with multiple agencies to secure wider regenerative benefits as part of a coherent strategy within the City Centre.

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

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This representation is in the interests of supporting a positive, justified and effective plan which reflects the ambition to deliver high quality design responses and which advocates designs that celebrate the history of the City in delivering architectural innovation.

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

Paragraph

N/A

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

N/A

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

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Name or Organisation:

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

Paragraph  Policy

9. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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Please tick as appropriate.

10. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

In relation to Conservation Areas, the University Group would support the comprehensive review of each Conservation Area to confirm that their designation and boundaries remain appropriate.

11. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

Paragraph

N/A

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

N/A

13. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

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Name or Organisation:

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Paragraph  Policy

2. Do you consider the Local Plan Review is:

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Consideration should be given as to how active travel training is provided by the council through funding obtained through developer contributions. The University Group Campus makes up a considerable part of the city centre and active travel can encourage further greening of the city centre if implemented appropriately through enhancing local spaces and encouraging a modal shift to more sustainable modes.

The University Group notes the Council are proposing the develop the first Very Light Rail scheme in the UK. As part of this local plan review, the University Group would welcome discussions with the Council regarding the route development of this scheme to ensure that there are new links provided between education, employment opportunities and key local residential areas.

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

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Name or Organisation:

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

Paragraph 

12.12-12.14
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 Policy 

AC2
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td></td></tr></table>		No	<table border="1"><tr><td>x</td></tr></table>	x
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

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Whilst supportive of the principle, the University Group must **object** to the current drafting of Policy AC2.2. At present, the Policy supports on-site provision of measures such as EV charging. However, power infrastructure can be a barrier to providing additional EV charging facilities.

The University Group wishes to work collaboratively with the Council on the changes to policy AC2 to better understand the plan for the delivery of the power requirements for new areas of EV charging in and around the City Centre and the University Group's Technology Park.

The policy accepts that off-site provision is possible only when demonstrated not be viable on-site. The capacity of the power network should be applied to located EV chargers is locations remote from the development being applied for. The Council is requested to confirm that this provision only applies when a viable means of power can be applied to the site.

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

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Name or Organisation:

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

Paragraph 

12.15-12.28
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 Policy 

AC3.3
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

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Car Parking policy should be informed by a robust evidence base and the reliability of alternatives. The University Group is committed to reducing single-occupancy car travel and supporting sustainable forms of commuting for staff and students. Staff and student surveys are prepared by the University Group to inform approaches to investment in personal mobility, public transport and active travel initiatives.

The University Group remains supportive of, and is committed to delivering development proposals in accordance with the provisions of the Adopted 2017 Local Plan, particularly the Multi-Storey Car Park on Lower Ford Street as referenced in Policies CC23 and CC24.

The University Group accepts that parking is part of a wider strategic approach which are underpinned by sustainable development principles. The growth in anticipated student numbers from a low point in 2019 will increase at a rate far higher than the corresponding provision of parking spaces, but it has to be acknowledged that a relatively high percentage of university staff live beyond the city's boundary and while car sharing on arterial routes into the university continues to be supported, the regular working patterns of individuals attending campus are now compromised by the introduction of hybrid learning arrangements and new pedagogies.

The number, type and management of car parking spaces remains an active part of the University Group's approach to access, movement and parking and ongoing analysis of staff and student surveys to be undertaken during the Autumn semester (the busiest within the academic

year) continues to help inform revisions to the strategy and investment decisions. Joint working with the Council to explore mutually beneficial EV charging points and mobility hubs to support cycling is encouraged, with resultant policies and proposals capable of being captured within the Local Plan review.

The University Group welcomes further discussions on the further nuanced approach to parking provision, namely under what circumstances future car parking provision would be deemed acceptable to support the university's operational needs. It is also suggested that as part of the Local Plan review and subsequent review on the transport design guidance, that details on sustainable multimodal sustainable transport hubs are considered for future developments.

The University Group is committed to managing car parking proportionally to the number of staff and students at the university and to managing the existing car parking provision in the best way possible. Therefore, the University Group would feel that new car parking provision should be only permitted when there is a robust justification to do so. This consideration should be factored into the updated parking standards and that a pragmatic approach should be taken to parking provision.

The University Group supports the idea of any new car parking provision having a high provision of EV charging facilities and associated high-quality provision for cyclists and walkers such as dedicated cycle hubs. However, available power networks will be critical to any delivery strategy. The Local Plan should therefore acknowledge the City Council's leadership in partnership discussions with utility providers to deliver the infrastructure necessary to support the initiative. Only through exceptional design and a robust operational justification should new or increased parking provisions be appropriate and once again a delivery matrix of active travel support should be factored into the delivery of any new parking schemes.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Paragraph

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

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Name or Organisation:

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

Paragraph 

12.15- 12.28
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 Policy 

AC3.5
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td></td></tr></table>		No	<table border="1"><tr><td>x</td></tr></table>	x
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
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Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>There has been much speculation about how a mobility credit system would work. The University Group is supportive of this measure however, there is much more work that needs to be done in order to deliver a successful approach. The changing nature of business operations would mean that a significant amount of resources and time would need to be dedicated to managing a mobility credit scheme. Until such time as greater certainty has been achieved, the University Group consider that this section of the Policy should be removed and therefore <b>objects</b> to the current wording on grounds that no clear alternative mechanism is currently in place.</p>
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4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Until such time as greater certainty has been achieved, the University Group consider that this section of the Policy should be removed and therefore **objects** to the current wording on grounds that no clear alternative mechanism is currently in place.

This representation is in the interests of supporting a positive, justified, effective and deliverable plan.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

Coventry University Group (CUG) has submitted multiple responses to various parts of the Regulation 19 Local Plan Review. Its primary interest is to ensure the Local Plan reflects the long term development ambition of CUG and its ability to unlock education, commercial, R&D, community and other benefits through continued investment across its estate. CUG wishes to participate in hearing discussions to ensure appropriate acknowledgement is given to the University Group's notable impact on the City Centre and wider sub-region. The University Group's primary objective is to secure a new City Centre Policy (CC2) and supportive text as captured in the representation.

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.***

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

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Name or Organisation:

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

Paragraph 

12.29- 12.38
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 Policy 

AC4
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td></td></tr></table>		No	<table border="1"><tr><td>x</td></tr></table>	x
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

New forms of micro-mobility provide some risks but also huge opportunities for the city to decarbonise. The University Group **objects** to the current drafting of the policy on the grounds that the title refers to Mico Mobility, however no mention of e-scooters / e-bikes is referenced in the provisions of the policy.

The University Group is at the forefront of transport design and there are ongoing and emerging projects which could be mutually beneficial to define the policy guidance. There should be consideration given to how e-bikes and e-scooters can be accommodated safely in the city and how charging facilities for these can be provided communally in a fire-safe space. Reference to standing advice from Active Travel England (created since the adoption of the last Local Plan) is also considered worthy of inclusion within the Plan.

The University Group continues to support active and sustainable travel as viable commuting methods for students and staff. In order to support a “pedestrian and cycling first” approach one has also to consider wider vehicle traffic re-routing, paid for by urban living residential schemes. The introduction of mobility hubs and the careful consideration of public realm design to improve legible cities and wayfinding remains a key priority of the University’s Public Realm Design Guide (and an aspect which will be captured in a University Campus Masterplan under new policy CC2).

The University Group also requests more details on plans for providing dedicated cycle routes through the city centre. While much work has been done to pedestrianise areas of the city centre there are no clear cycle routes provided for cyclists once they reach the edge of the ring road. It is recommended that consideration is given to including the city centre in the changes to this policy.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The University Group **objects** to the current drafting of the policy on the grounds that the title refers to Mico Mobility, however no mention of e-scooters / e-bikes is referenced in the provisions of the policy.

This representation is in the interests of supporting a positive, justified, effective and deliverable plan. The representation also acknowledges the role of ongoing collaboration between the University, City Council and transport partners to deliver a coherent accessible infrastructure within the City Centre and beyond.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

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

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Name or Organisation:

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

Paragraph 

12.39-12.48
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 Policy 

AC5
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

The University Group enrolls a high number of international students, which presents cultural challenges in relation to the patronage of public transport. This is an issue the University Group is acutely aware of and is putting in place measures to encourage take-up as a viable, safe and reliable of transit around the City and between destinations linked to the university Campus.

The University Group will share the results of staff and student surveys at the appropriate time to help promote integrated measures to support active travel and help inform the underlying evidence base in support of Local Plan policy.

The University Group also welcomes the proposals of the VLR scheme and would like to work collaboratively on this scheme to ensure that the proposed routes for the VLR connect residential areas with key areas of employment in the city. The University Group acknowledges that the VLR scheme is unique and has the potential to support a significant reduction in car trips in Coventry should it be delivered effectively.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-

compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation is in the interests of supporting a positive, justified, effective and deliverable plan. The representation also acknowledges the role of ongoing collaboration between the University, City Council and transport partners to deliver a coherent accessible infrastructure within the City Centre and beyond. Sharing knowledge between the parties will also help to inform an ongoing evidence base to justify refinements to the policy landscape.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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**No**, I do not wish to participate in hearing session(s)

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

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Name or Organisation:

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

Paragraph 

12.49- 12.54
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 Policy 

AC6
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

Please tick as appropriate.

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<p>The University Group supports the upgrade of Policy AC6 as set out in the Reg 19 Submission Draft. Rail accounts for an important modal share of staff and students who attend university. Prior to the pandemic, there were significant proposals to improve rail connectivity to Coventry, namely to Leicester etc. via Nuneaton. The University Group can see such improvements creating new employment corridors for travel. These improvements would see an overall reduction in car trips in and around Coventry and support the wider carbon reduction strategy which is set out within this policy document.</p>
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4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

<p>This representation supports the policy ambition of the Council in improving public transport infrastructure.</p>
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**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

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

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Name or Organisation:

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

Paragraph 

13.1- 13.10
----------------

 Policy 

Chapter 13
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

Please tick as appropriate.

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The University Group considers that the impacts of global heating are becoming more frequent and more severe. Given the decades long life span of new buildings they need to be net zero ready now rather than in 2050 to avoid loading significant retrofit costs onto future owners and occupiers.

In relation to the references to Environmental Hazards within the Chapter, it should be noted that major new developments are not required to ameliorate pre-existing impacts per se. This is important in the context of major developments within the City Centre, where existing traffic levels accommodated by previous road-building programmes are significant, with the associated air quality and noise issues. Background noise levels within the City Centre are elevated and the amenities of City Centre residents are therefore different to those living in suburban areas.

Notwithstanding this, the University Group accepts that opportunities to introduce a greening of the urban form in the City Centre could play an important role in transforming the area, alongside changes in traffic routing which could generate positive outcomes for all. The University Group will work with the City Council to bring forward positive outcomes in the City Centre and in line with the University's development ambitions and Masterplan proposals.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or

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This representation is in the interests of creating a positive, justified, effective and deliverable plan and which does not place onerous requirements on emerging development projects.

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Paragraph

N/A

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

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Name or Organisation:

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

Paragraph 

13.1- 13.10
----------------

 Policy 

EM1
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

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The University Group has developed a Public Realm Design Guide which includes reference to the introduction of Sustainable Urban Drainage approaches within public realm interventions. The University Group is supportive of the general policy approach captured in Policy GE1 (part 5) and EM4 (Part 10) in relation to the principle of de-culverting existing watercourses within the City Centre, notably Fairfax Street which provides a defined opportunity. Developing an integrated Green and Blue Infrastructure Strategy and Traffic Re-routing Strategy within (parts of) the City Centre as a precursor to subsequent Masterplanning exercises would appear prudent.

The University Group supports the concept of community heat networks and would encourage the planning of such networks to ensure that waste heat from non-domestic buildings is captured and used in the network. Like many other large organisations the university ejects significant amounts of heat from server rooms, catering outlets, laboratories, air-conditioned spaces, and combined heat and power units – this heat should be captured and used in community energy networks.

The University Group supports the setting of ambitious standards for buildings going beyond existing Building Regulations for the reason that net zero needs to be achieved before 2050. This justifies that new buildings are designed to achieve net zero without requiring expensive and disruptive retrofit. Standards compliant with those set by Passivhaus are recommended as a minimum. In addition, any new builds should include the ability to generate more energy than

is required for their operation to offset the lingering impact of older premises which are incapable of being retrofitted to become carbon negative.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

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Name or Organisation:

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

Paragraph 

13.11- 13.15
-----------------

 Policy 

EM4.10
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

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The University Group is supportive of the general policy approach captured in Policy GE1 (part 5) and Policy EM4 (Part 10) in relation to the principle of de-culverting existing watercourses along Fairfax Street. Fairfax Street presents a number of key opportunities to deliver alternative traffic and movement principles. Redevelopment of Council owned assets in the area (such as but not limited to part of the Pool Meadow Bus Station as part of a Northern Regeneration Scheme alongside Homes England funding) is also likely to form part of the transformation of this part of the City Centre. A comprehensive masterplan for this area, which aligns with the University Group's ambition for its Cathedral Quarter area, and which supports urban living and higher residential densities would be supported in principle.

Developing an integrated Green and Blue Infrastructure Strategy and Traffic Re-routing Strategy within (parts of) the City Centre as a precursor to subsequent Masterplanning exercises would appear prudent. Fairfax Street presents an opportunity to open the River Sherborne as part of a positive plan for change in the immediate area. Such an intervention is expected to be funded by the Council, as highway authority and in the interests of meeting numerous City Centre and Environmental policy objectives.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation is in the interests of creating a positive, justified, effective and deliverable plan which recognises cross-referencing to policy objectives within defined areas of the City Centre.

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Paragraph

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

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Name or Organisation:

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

Paragraph 

13.58- 13.60
-----------------

 Policy 

EM11
------

2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

While the University Group is supportive of the principle of micro-renewable energy generation within major development schemes, the City Council is encouraged to investigate and guide the appropriateness of different forms of energy generation in locations across the City, offering clarity as to the appropriateness of using roof structures for PV's vs Green Roof treatments or Roof based water storage solutions.

The University Group supports the objectives as set out in new Policy EM11 to require the inclusion of significant renewable energy generation within any new development especially those with appropriately orientated roofs. The University Group also supports community energy schemes to provide community benefit from large developments and to reduce pressure on the existing grid.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation is in the interests of creating a positive, justified, effective and deliverable plan which recognises cross-referencing to policy objectives within defined areas of the City Centre.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

Coventry University Group (CUG) has submitted multiple responses to various parts of the Regulation 19 Local Plan Review. Its primary interest is to ensure the Local Plan reflects the long term development ambition of CUG and its ability to unlock education, commercial, R&D, community and other benefits through continued investment across its estate. CUG wishes to participate in hearing discussions to ensure appropriate acknowledgement is given to the University Group's notable impact on the City Centre and wider sub-region. The University Group's primary objective is to secure a new City Centre Policy (CC2) and supportive text as captured in the representation.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

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Name or Organisation:

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

Paragraph 

13.69-13.70
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 Policy 

EM12
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2. Do you consider the Local Plan Review is:

	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(1) Legally compliant						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>The University Group are actively engaged in the delivery of academic programmes linked to Sustainable Development and environmental impacts and outcomes. The University Group would be keen to engage with the Council to bring forward mutually beneficial initiatives and approaches which secure positive planning and university outcomes in the context of Local Plan policies. The University Group has developed a comprehensive Decarbonisation Strategy (2023) with specific action plans generated by this being delivered over the life of the current and emerging Local Plan review periods. Options and initiatives which support zero carbon transport and carbon neutral development schemes will be considered as part of the University Group's wider development ambitions (and Masterplan development) over the life of the Local Plan.</p>
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4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation is submitted for background / reference purposes and in support of creating a positive, justified, effective and deliverable plan which recognises cross-referencing to policy objectives within defined areas of the City Centre.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

Coventry University Group (CUG) has submitted multiple responses to various parts of the Regulation 19 Local Plan Review. Its primary interest is to ensure the Local Plan reflects the long term development ambition of CUG and its ability to unlock education, commercial, R&D, community and other benefits through continued investment across its estate. CUG wishes to participate in hearing discussions to ensure appropriate acknowledgement is given to the University Group's notable impact on the City Centre and wider sub-region. The University Group's primary objective is to secure a new City Centre Policy (CC2) and supportive text as captured in the representation.



***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

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Name or Organisation:

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

Paragraph 

13.77- 13.78
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 Policy 

EM15
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2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(2) Sound	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						
(3) Complies with the Duty to co-operate	Yes	<table border="1"><tr><td>x</td></tr></table>	x	No	<table border="1"><tr><td></td></tr></table>	
x						

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

As referenced elsewhere in the University Groups' representation, it should be noted that major new developments are not required to ameliorate pre-existing impacts. This is important in the context of major developments within the City Centre, where existing traffic levels accommodated by previous road-building programmes are significant, with the associated air quality and noise issues. Background noise levels within the City Centre are elevated and the amenities of City Centre residents are therefore different to those living in suburban areas. Such issues are expected to be addressed as part of technical impact assessments submitted in support of major planning applications.
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4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This representation is in support of creating a positive, justified, effective and deliverable plan which recognises the principle that development proposals must demonstrate no additional significant detrimental residual impacts.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

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

Paragraph

N/A

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

N/A

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

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