



Ref:

**Coventry Local Plan Review
Regulation 19**

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

(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, 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

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

This form has two parts:

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

Part B – Your representation(s).

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

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Part A

2. Agent's Details (if applicable)

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

boxes below but complete the full contact details of the agent in 2.

Title

Mr

First Name	Gurdip	
Last Name	Nagra	
Job Title	Principal Planning and Land Use Officer	
(where relevant)		
Organisation	Transport for West Midlands - West Midlands Combined Authority	
(where relevant)		
Address Line 1	16 Summer Lane	
Line 2	Birmingham	
Line 3		
Line 4		
Post Code	B19 3SD	
Telephone Number		
E-mail Address		

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (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.

Not applicable

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

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

We welcome the strengthening of policies relating to active travel. The integration within development or infrastructure proposals with existing sustainable travel infrastructure is essential in maintaining a multimodal transport network. Active travel impacts and opportunities should be kept in mind at scheme inception through to design stage with the commitment remaining consistent across all highway infrastructure improvements.

Ensuring the road network remains resilient and adaptable to future growth will be underpinned by continuous monitoring and evaluation over time, and we would welcome opportunities to continue to collaborate with Coventry City Council and other key transport stakeholders.

We welcome the development of an Adaptation and Resilience Plan for the city and look forward to seeing how this aligns with the WMCA Climate Change Adaptation Action Plan.

- The reference to the National Design Guide is welcomed, but it would be beneficial to also include a specific reference to LTN 1/20 for cycling infrastructure, alongside other key documents such as Inclusive Mobility.
- Support for proposals that reduce car dominance and improve conditions for active travel and public transport is welcomed.
- **Section 12.3.6 (pg. 120)** references Manual for Streets for determining cycling infrastructure based on traffic levels and speeds. It would be beneficial to also reference LTN 1/20 to ensure infrastructure meets safe and inclusive standards.
- **Section 12.3.6** mentions the inclusion of Advanced Stop Lines (ASLs) for cycling. While ASLs are welcomed, they are unlikely to be sufficient on their own to encourage most people to cycle through major junctions.
- **Section 12.3.7** support for pedestrian improvements is welcomed. The inclusion of Pedestrian Comfort Levels could help determine appropriate treatments and additional measures.
- **Policy AC4 1a** support for safe, comfortable, and convenient walking and cycling routes is welcomed, but the wording could also include attractive, direct, and cohesive in line with WRAT and CloS tools.
- **Appendix 6** still references the NPPF from December 2023 – clarification is needed on whether this will be updated.
- **Policy AC5** makes a small reference to mobility hubs – this should be expanded with a clear definition in the glossary and included within walking and cycling proposals.
- **Policy DS4a** states that cycle parking should align with the Local Plan's parking requirements. Does this account for potential future increases in cycling demand due to investment in cycling infrastructure?
- **Policy AC3** states that Travel Plans will be required for new developments. Will mode shift targets be updated to reflect ambitions for increased sustainable travel?
- **Policy AC3** would benefit from a clear definition of micro-mobility.

- **Policy AC4** support for repurposing streets towards active travel is welcomed (e.g. School Streets and traffic calming). Will this include reductions in carriageway widths and lanes to ensure pedestrian and cycle routes meet the desirable minimum widths in LTN 1/20?
- **Policy JE1** (economic and employment strategy) could provide stronger references to improving sustainable transport links to employment sites.
- **Policy JE7** does not explicitly reference improving walking, cycling, and public transport links to employment. Given accessibility requirements, particularly for deprived areas, greater priority should be given to sustainable travel modes.
- **Policy EM7** supports low-emission transport but only references electric vehicles and biofuels. Walking and cycling should also be included.
- General comment: The phrase "choice of means of transport" could be reviewed to encourage greater priority for walking, cycling, and public transport.
- **Policy DE1 Part T** states that car parking should be integrated into developments but assumes car parking is a requirement, contradicting city centre policies. The impact on pedestrian and cyclist safety should also be considered.
- **Policy DE1 Part U** combines cycle parking with waste management facilities. Cycle parking should have a separate policy section.
- **Policy DE2** requires developments of 10 or more residential dwellings to include walking and cycling routes. Should this not be a standard requirement for all residential developments?

Regulation 19 Appendices

- Table 1 (Cycle Parking Standards) – Given the aspirations for cycling growth, are the proposed cycle parking allocations ambitious enough? E.g. for hotels, the standard of 1 space per 10 staff members if required suggests a low expectation for cycling uptake.
- Table 1 (Car Parking Standards) – Is a 1:1 car parking ratio per dwelling size ambitious enough to encourage modal shift?

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

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

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

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

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

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

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

Paragraph

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

No comment

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

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

Not applicable

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.