

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, 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 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.

Part A

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

First Name

Last Name

Job Title

(where relevant)

Organisation

University of Warwick

Turley

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

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

Chapter 15

 Policy

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4. 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.

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.

Chapter 15: Infrastructure Delivery, Implementation and Monitoring

With reference to Appendix 8 Monitoring Framework and the approach to monitoring of transport related policies AC1 to AC7, the University does not consider this level of monitoring to be effective, justified or consistent with national policy.

The current suggested approach to monitoring is piecemeal and reliant on simple measurements against the IDP delivery, adoption of parking standards and travel plans. There is reference to monitoring bus patronage, single occupancy car use and rail patronage and footfall but with no clarity of what effective or justified measurement this will be graded against.

The University believes that a much greater depth of analysis should be provided by the Council on an annual reporting basis, aligned with the Vision and Validate approach advocated in the NPPF. An Integrated Transport Monitoring Report should be produced on an annual basis and made publicly available to monitor travel demand and behaviour change on a mode-by-mode basis with KPIs aligned to the transport policies. This data can be analysed together with delivery

of the IDP projects to allow a holistic and effective monitor and manage approach for the lifetime of the plan period.

This level of monitoring is required to provide an on-going evidence base, measured insight of policy implementation and to facilitate continuous learning and adaptive changes to support sustainable and active travel.

(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.

Amendments should be made to Appendix 8 with regards to the indicators and targets for monitoring of policies AC1-AC7 to ensure greater depth of analysis and an effective monitor and manage approach over the Plan period. We suggest this includes the production of an annual Integrated Transport Monitoring Report, providing an evidence base for travel demand and travel behaviour change over the Plan period on a mode-by-mode basis to effectively monitor transport policy and targets.

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

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

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

7. 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

(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:

The University considers that given the measures implemented to date on the campus related to active travel improvements and monitoring, they are well placed to be party to discussions related to future and effective monitoring of policies AC1-AC7.

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

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