

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	Ms	
First Name	Jennie	
Last Name	Johnson	
Job Title	Planning and biodiversity Officer	
(where relevant)		
Organisation	Warwickshire Wildlife Trust	
(where relevant)		
Address Line 1	Brandon Marsh, Brandon Lane	
Line 2		
Line 3		
Line 4	Coventry	
Post Code	CV3 3GW	
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:

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

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.

Warwickshire Wildlife Trust (WWT) is extremely concerned regarding the Local Plan which includes housing allocations near to important Local Wildlife Sites (LWS) and wider corridors such as the Courdon Wedge, Coventry Canal and River Sowe and doesn't go far enough in term of Biodiversity net gain Targets. There also isn't an up to date Green Infrastructure evidence base.

Considering the proposed housing allocations, there are a number of important Local Wildlife Sites which would be significantly impacted including:

The Coventry Canal LWS, Lower Stoke LWS, Sowe Valley Stoke Aldermoor to London Road LWS, Rock Farm Sludge Lagoons PLWS, Hearsall Common LWS, Stoneleigh Park PLWS and Stareton Wood LWS,

These allocations aren't evidence based as the Housing site assessment and Sustainability Appraisal haven't fully assessed the environmental impacts and nearby assets.

WWT are extremely concerned that the plan isn't:

-Positively prepared- the plan doesn't positively consider wildlife/ Green Infrastructure and biodiversity and as it doesn't include our previously suggested

20% Biodiversity Net Gain. Which has been achieved in other councils such as Cornwall and has been viable in other local schemes.

WWT is also disappointed that the Tree Canopy Target has also been removed. Which would help deliver the councils ambitious climate change targets, biodiversity emergency status and national targets such as 30% land in nature recovery by 2030 in the Environment Act.

Justified – the plan and ‘Sustainability Appraisal’ hasn’t considered alternatives sites in enough detail, away from Local Wildlife Sites and environment assets and there’s not enough previous consultation on housing sites.

Allocations are also on land within the Green Belt, an important buffer for protected and important species know to use the area.

In terms of ‘Policy GE1 and EM1 climate change– the Green and Blue Infrastructure evidence is out of date, and it is not enough to rely on the Local Nature Recovery Strategy which is at a very early stage and won’t go far enough.

Policy GE3 - also should refer to ‘Local Wildlife Sites’ and ‘Potential Local Wildlife Sites’, and should say ‘and enhance’ and be more ambitious. Especially if the council is serious about meeting the 30 by 2030 in the Environment Act.

WWT also reiterates our previous comment that in terms of Policy AC4 and the ‘Active Transport Provision’ section and cycle paths, the plan needs to ensure it is balancing wildlife and cycling. As there are important habitats and trees in these locations and along waterways, where recreation can have a real impact on local habitats.

Effective- the plan doesn’t consider wider Green and Blue Infrastructure issues and opportunities for enhancement and the Wildlife Trusts ‘Wildbelt policy’. The LNR is at a very early stage still and shouldn’t be solely relied on.

Consistent- the plan is not consistent with the National planning policy framework (NPPF) as it includes sites within the green belt without a detailed enough green belt review. As well as sites near to designated Local Wildlife Sites contrary to national policy and Habitat and NERC laws. Which require the Council to legally consider impacts on wildlife in the area.

We do hope that you will consider these serious concerns when deciding amendments on the final plan.

Kind regards,

Jennie

Jennie Johnson

Planning and Biodiversity Officer

(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.

Remove 10% Biodiversity Gain and add the more ambitious 20% Biodiversity net gain. Based on local examples which prove this is viable in the area.

Add a more detailed Green Infrastructure policy and areas on the proposals map showing ambitious areas for enhancement in line with the NPPF. LNRS is at a too early stage to be relied upon. Or agree to additional SPD.

Add Tree Canopy Target back in, in line with the Council's declared Climate Change Emergency and the Environment Act's target of 30% land in nature recovery by 2030.

Remove housing allocations in the Courdon wedge, green belt and near to Local Wildlife Sites, which the Sustainability Appraisal and Housing Site Assessment work hasn't fully assessed, in terms of the environmental impacts. Making it currently unsound.

Policy GE3 - should refer to 'Local Wildlife Sites' and 'Potential Local Wildlife Sites', and should say 'and enhance' and be more ambitious. Especially if the council is serious about meeting the 30 by 2030 in the Environment Act.

Policy AC4 and the 'Active Transport Provision' section and cycle paths, the plan needs to ensure it is balancing wildlife as well as cycling. As there are important habitats and trees in these locations and along waterways, where recreation can have a real impact on local habitats. We have received a lot of recent complaint from our Members regarding habitats clearance for these cycle paths. Full tree surveys and ecological surveys need to be carried out before work takes place.

(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

full

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

The Sustainability Appraisal hasn't considered environmental impacts and particularly Local Wildlife sites and Potential Local Wildlife Sites in detail.

The plan allocates land in the green belt, Courdon wedge and near to important Local Wildlife Sites without a clear assessment of environmental impacts and alternative sites considered in detail.

(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)?

x

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:

no

(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.