

Coventry City Council

Coventry Local Plan Review

Regulation 22 Consultation Statement (submission) August 2025



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1.0 Introduction

1.1 Purpose

This Consultation Statement sets out how the Council has involved residents and key stakeholders in undertaking the review of the Coventry Local Plan and Area Action Plan, both of which were adopted on 6th December 2017. All references to 'The Local Plan' include both documents. The new plan period runs from 2021 to 2041. The review has been undertaken in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (referred to from here as 'The Regulations') as required by the Regulation 22, which is set out below.

- **22.**—(1) The documents prescribed for the purposes of section 20(3) of the Act are—
- (c)a statement setting out—
- (i)which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii)how those bodies and persons were invited to make representations under regulation 18,
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv)how any representations made pursuant to regulation 18 have been taken into account;
- (v)if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi)if no representations were made in regulation 20, that no such representations were made;

This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted <u>Statement of Community Involvement</u> (SCI) (2021).

The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters.

1.2 Background

This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by representations.

On 6th December 2022 Council approved the commencement of a full Local Plan Review for the City.

The Local Plan Review sets out the reviewed strategic vision, objectives and spatial strategy for the City, as well as the planning policies which will guide future development. The Local Plan documents support the regeneration of the city and meet the needs of the population through decisions regarding where new housing and employment should be. Additionally, they ensure that the environment and its historic features are protected and that development is adapted to climate change.

The Plan will look ahead to 2041 and identify the main areas for sustainable development growth. It reviews policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

The Local Plan has undertaken two formal consultation stages, these being at Regulation 18 and Regulation 19 stages, during which the Council received 1,719 comments from 930 respondents at Regulation 18 stage and 402 comments from 75 respondents at Regulation 19 stage.

The reviewed Local Plan will replace the adopted Coventry Local Plan (2017) and the Area Action Plan for the City Centre (2017) that currently make up the development framework for the City, along with the Homes in Multiple Occupation Development Plan Document which was adopted on 26th March 2025

The Regulations set out which bodies must be consulted. In terms of The Duty to Co-operate, partners and Prescribed Bodies are set out in the Duty to Co-operate Compliance Statement and are therefore not duplicated here.

In terms of the Specific Consultation Bodies the Regulations set out that the following must be consulted (the below list has been updated to reflect current titles, local application and includes only those of relevance to Coventry):

- Mining Remediation Authority
- The Environment Agency
- Historic England
- Natural England
- Network Rail
- National Highways
- Homes England
- A relevant authority any part of whose area is in or adjoins the local planning authority's area (North Warwickshire Borough Council; Nuneaton and Bedworth Borough Council; Rugby Borough Council; Solihull Metropolitan Borough Council; Warwick District Council and Warwickshire County Council, and the relevant Parish Councils)
- A neighbourhood forum any part of whose area is in, or adjoins, the local planning authority's area (Willenhall Neighbourhood Forum)
- Coventry and Warwickshire Integrated Care Boad (ICB)
- National Grid
- Severn Trent Water

In terms of the General Consultation Bodies the requirements of the Regulations and the local application of these are set out below.

- a) Voluntary bodies some or all of whose activities benefit any part of the local planning authority's area,
- b) Bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area,
- c) Bodies which represent the interests of different religious groups in the local planning authority's area,
- d) Bodies which represent the interests of disabled persons in the local planning authority's area,
- e) bodies which represent the interests of persons carrying on business in the local planning authority's area.

In terms of a, b, c and d, the scope and variety of such organisations is far-reaching and therefore in order to promote engagement in the Local Plan Review, communications via newsletters and other media releases were issued via the Councils Communications Team and also consultation with Voluntary Action Coventry. Organisations are also encouraged to register with the Planning Policy Consultation database to ensure that regular updates are received. Offers of bespoke engagement sessions were also made particularly aimed at hard-to-reach groups and in that regard discussions were held with: Carriers of Hope, Earlsdon Retirement Village, Grapevine, Multi-Faith Forum, Disability Equality Action Party, Homelessness Forum, St Francis of Assis Church and the WMCA Homelessness Unit. See Issues and Options consultation Statement at **Appendix 1** for further detail.

In terms of (e), many businesses register directly with the Planning Policy consultation data base but also via the Coventry and Warwickshire Chamber of Commerce, the Federation of Small Business, the Coventry and Warwickshire Growth Hub and at Regulation 18 stage a bespoke event for business engagement was hosted by Marrons and attended by Council Officers to discuss the plan (see **Appendix 1**).

The police and crime commissioner and the Local Policing Body are also specified in Part 2 of the Regulations.

1.3 Regulation 18

The Council undertook an Issues and Options Consultation between Tuesday 18 July and Friday 29 September 2023. This offered the opportunity for comment on ideas for updating the plan. This included the Sustainability Appraisal Initial Report and Equalities & Health Impact Assessment, on which comments (representations) could also be made during the consultation period. The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents, ran several drop-in sessions and arranged targeted events for hard-to-reach groups. For information regarding how the Council consulted, the

comments that were received and how the Council responded to these in the Local Plan Review, see **Appendix 1**.

1.4 Regulation 19

The Council's Proposed Submission Local Plan Review and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 for a six-week consultation period from Monday 20th January until Monday 3rd March 2025. As was the case with Regulation 18, the Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents, as well as the offer of specific discussion with hard-to-reach groups. Additionally, the Council reached out to the three Parish Councils (Allesley, Keresley and Finham) and also to the Willenhall Neighbourhood Forum with an offer to discuss the plan. As a result, Allesley Parish Council made representations, and Allseley and Finham Parish Councils also both confirmed they were no longer progressing a Neighbourhood Plan. The Council then met with Finham, at their request, to discuss the plan further. The consultation was promoted in a variety of ways, for example, through social media platforms, and press releases; information was also available in libraries and on the Council's website.

1.5 Accordance with Statement of Community Involvement

In regard to engagement in the Plan Review, a variety of consultation techniques were used in accordance with the Statement of Community Involvement, as set out below.

General standards	
Ensure consultation and	See section 1.2 of this report, the
engagement is in accordance with	Regulation 18 Consultation Statement
statutory provisions and in line with	(Pages 4-5 in Appendix 1), as well as the
the relevant Regulations. This will	separate Duty to Cooperate Compliance
include consultation with specified	Statement which sets out the accordance
statutory bodies and other parties at	with statutory provisions. The Council
the necessary stages of the policy	maintains a consultation database, hosted
making process.	by Inovem which includes details of all
-	consultees including statutory bodies and
	participants in the process are encouraged
	to manage their own accounts to ensure
	details are securely updated.
	Coventry Local Plan Review Regulation 19
	Consultation - Coventry City Council
	Planning Policy Consultations
Publish on our website -	The Evidence Base can be found on the
www.coventry.gov.uk/planningpolicy	Planning Policy web page,
all completed evidence used for	https://www.coventry.gov.uk/planning-
developing our policy documents,	policy/local-plan-review/3
including Plain English non-	
technical summaries where	

evidence is of a complex and	
technical nature.	
Provide a record of what evidence has been commissioned and the expected date for completion and publication of this.	Information and updates are provided on the Councils Planning Policy webpage https://www.coventry.gov.uk/localplanreview
Publish our Local Development Scheme (the project timetable for producing all our planning policy documents) on our website at the above link. We will update this at least annually, or when there are significant changes to the timescales or plans being prepared. We will report on progress through our annual Authorities Monitoring Report which we also publish on the same web page.	The up to date Local Development Scheme is published on the Planning Policy webpage https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/7 The Authorities Monitoring report is published annually and can be seen here https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/6
Place Planning Policy consultation documents on the Council website together with any supporting information needed to enable people to understand what they are being asked to comment on and state where and when documentation can be inspected	All consultation information regarding the Local Plan review is on the website https://www.coventry.gov.uk/planning-policy/local-plan-review/4
Make full use of online consultation methods as the primary means of notification, engagement and involvement, but adapt to alternative methods where specific needs are identified for groups or individuals, or where legislation requires	The Council makes use of an online consultation page, providing information regarding consultation on the Council's website, through social media and local press. Alternative methods consisted of information provided at the local libraries through provision of consultation documents and drop-in sessions, as well as in person meetings with hard-to-reach groups (Pages 4-6 of Appendix 1). The consultation webpage encourages registration with an online account hosted by Inovem and responses can also be submitted via this portal.
	Homepage - Coventry City Council Planning Policy Consultations

Ensure that documents are publicised and made available as required by the relevant legislation. The Council will use libraries and/or other public venues within the city where they would help the local community access information. However, in extreme circumstances (such as a global pandemic) this might not be an available option and so full use of electronic versions of material will always be made available on the Council's website. This detailed further in Section 4, which covers matters of resilience.

The documents are available on the Council's website, as well as the consultation page, which are linked below. Furthermore, information in hard copy is provided at the local libraries and the Council House.

Homepage - Coventry City Council Planning
Policy Consultations
About the Local Plan Review - Coventry
City Council

Contact specific consultees as set out in the relevant legislation and those who have asked to be included on the Planning Policy consultation database, and invite them to make representations, advising where and when the relevant material can be inspected, how copies can be obtained, the closing date for representations and where to send any representations.

Information regarding the contact with specific consultees can be found in the Duty to Cooperate Statement Regulation 19, as well as Pages 4-5 of Appendix 1. The relevant material is available on the Council's website, as well as the consultation page.

Coventry Local Plan Review Regulation 19
Consultation - Coventry City Council
Planning Policy Consultations

Use the Council's website and social media channels to raise awareness of consultation programmes and how to engage.

Information regarding the consultation programmes can be found on the Council's website, which is linked below. Social media was also used and this included at Regulation 18 stage: 15 posts on Facebook and X, and 2 on LinkedIn, on the Council's official social media accounts during the consultation period. The web page also included a short video about the plan review.

About the Local Plan Review – Coventry City Council

Consider the use of adverts and/or press releases to local newspapers circulating in the area, if those documents are known to achieve reliable circulation and would help a community access information on a

Press releases were utilised during both consultation stages, please refer to pages 82-83 of Appendix 1; and Appendix 2.

consultation which would be	
relevant to them, advising where	
and when the relevant material can	
be inspected, how copies can be	
obtained, the closing date for	
comments and where to send these.	
Use internal and external best	To meaningfully engage with citizens, the
practice to meaningfully engage with	Council organised in-person meetings with
citizens, especially hard to reach	hard-to-reach groups. Additionally, through
groups.	cooperation with different Council
	departments such as the inter-faith and the
	migration services, it was suggested which
	groups to contact. Further research was
	carried out to ensure that different
	community groups were included in the
	conversations. A series of drop-in sessions
	were held in local venues, a video was
	placed on the website and linked via social
	media and webinars were held for those
	wishing to join and find out more.
Provide appropriate advice and	The website was kept up to date with
information to the public as	contact details and latest information, and
requested.	advice and guidance (for example
	understanding policy wording, seeking
	guidance with forms etc) was provided at all
	stages.
Produce a report summarising	Please refer to Appendix 1 for the
consultation methods,	Regulation 18 Consultation Statement
representations made and Council	summarising these. The Regulation 19 key
responses (whether requiring a	issue summary has been provided in
change to the document or not).	Section 3.
Regulation 18 stage	
Discuss the scope of the plan, and	Please refer to pages 3-6 of Appendix 1.
issues needing to be addressed	
(and options for dealing with these	
where applicable) with partners and	
with communities through existing	
forums and groups, with particular	
attention to 'hard to reach'	
communities	
Arrange events and/or workshops to	A range of drop-in sessions and webinars
discuss issues and proposals. Place	and bespoke workshops were held.
emphasis on understanding	'
community views at early stage of	
, ,	I

	,
plan making and explore and	
resolve conflicts as far as possible;	
Agree strategic matters which need	Please refer to the Duty to Cooperate
to be addressed beyond the Local	Compliance Statement.
Authority boundaries through the	
statutory Duty to Co-operate and	
initiate Statements of Common	
Ground.	
Regulation 19 stage	
Send a statement of the	This was included on the Planning Policy
representations procedure and a	web page and emailed via Inovem Consult
statement of the fact that the	to all on the consultation data base. Follow
proposed submission documents	up emails were sent to all Duty To Co-
are available for inspection and the	operate bodies. In order to further promote
times at which they can be	awareness a summary of Regulation 19
inspected to all of the consultees	Consultation Techniques can be seen
that were invited to comment in	below:
earlier plan making stages	The consultation was promoted on Special media: 2 posts on Especial 2
	social media: 2 posts on Facebook, 2 on LinkedIn and 2 on X for the
	'impressions' statistics please see
	Appendix 3) were made on the
	Council's official social media
	accounts during the consultation
	period. This campaign was also run
	on BlueSky and Threads, however
	due to limitations with the platform
	API's, the Council is unable to
	provide reporting data on those
	posts.
	 Contacted hard to reach groups and
	offered a chance to talk to us
	 Summary booklet published on the
	Council Website.
	 Information was published on the
	Council's website.
	 Coventry Observer and local press
	covered the information regarding
	consultation.
	 Provided information in the libraries
	and the Council House.
Publish for a six-week consultation	The Regulation 19 consultation was duly
period in accordance with legislative	carried out for six weeks, which can be
requirements;	seen on the consultation page linked below.
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	Coventry Local Plan Review Regulation
	19 Consultation - Coventry City Council
	Planning Policy Consultations
Seek views on whether the	This has been satisfied through the
document is legally compliant and	guidance provided on the website:
sound	
	During the Examination of the Local Plan
	the Planning Inspector is only able to
	assess whether the revised Local Plan has
	been prepared in accordance with legal and
	procedural requirements, and whether it is
	'sound'. Therefore, all representations on
	the draft Local Plan must relate to a matter
	of legal compliance or a matter of
	soundness as follows:
	Logal compliance: Doos the Logal Plan
	Legal compliance: Does the Local Plan
	comply with the legal and procedural requirements for its preparation?
	requirements for its preparation:
	Soundness: Is the Local Plan sound? Has
	it been positively prepared, justified,
	effective and aligned with national policy?
	Does it meet the following four tests? It
	must be:
	Positively prepared – the Plan has
	attempted to meet all of Coventry's housing
	and employment land needs and
	discussions have taken place with
	neighbouring councils to help meet any shortfalls.
	Justified – the Plan sets out a development
	strategy that has been informed by up-to-
	date evidence and consideration has been
	given to alternative strategies.
	Effective – the Plan is deliverable, and
	efforts have been made to address any
	issues impacting on the broader region.
	Consistent with national policy.
	Duty to Cooperate: Has the plan complied
	with the Duty to Cooperate? Has the
	Council engaged and collaborated
	effectively with neighbouring authorities and
	other legally prescribed organisations in
	preparing the Local Plan?

	The Sustainability Appraisal, which is an assessment of how the proposals and policies of the plan meet a range of sustainability criteria was also available for comments.
Agree and finalise Statements of	Please refer to the Duty to Cooperate
Common Ground as required by	Statement.
Planning Practice Guidance under	
the statutory Duty to Co-operate.	

2.0 Plan Production Timeline

The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required.

The below timeline outlines main consultation stages of the emerging Local Plan up until the Submission in September 2025.

- 1. Brownfield Land Call for Sites: 23 March 2022 1 June 2022 Initial Call for Sites (Brownfield land only and both residential and non-residential). As part of this call for sites, undeveloped sites from previous SHLAAs / Urban Capacity Studies were considered, with landowners contacted and invited to re-submit their sites for consideration within this HELAA. 30 submissions of which 24 were shortlisted and six were discounted.
- Coventry Local Plan Review Issues and Options (Regulation 18)
 Consultation: 18 July 2023 29 September 2023
 The first formal consultation during which 1,719 comments were received from 930 respondents.
- 3. Second Call for Sites: 18 July 2023 29 September 2023
 Second Call for all Sites (brownfield and greenfield land and both residential and non-residential) as part of Regulation 18 Issues and Options consultation. 46 sites submitted. 10 were shortlisted for brownfield and 36 which were all discounted due to being out of scope such as being Green Belt, being within another local authority area, or being within an existing allocation.
- 4. Brownfield Call for Sites: 27 November 2023 22 January 2024
 Brownfield land Call for Sites (residential and non-residential).
 10 submissions of which six were shortlisted. Four were discounted due to being out of scope.
- 5. Brownfield Call for Sites: 5 March 2024 7 April 2024 Final brownfield land Call for Sites (residential and non-residential). six submissions of which four were shortlisted and two were discounted due to land assembly.
- 6. Employment Land Call for Sites: 22 August 2024 20 September 2024.

Specific employment land call for sites. Three submissions all of which were discounted due to either being existing employment sites or not aligned with the development strategy.

7. Regulation 19 Consultation 20 January 2025 – 3 March 2025 The final consultation stage in the Local Plan Review process with 402 comments received from 75 respondents.

8. Submission September 2025

3.0 Summary of Regulation 19 Process and Main Issues

3.1 Summary of Process

The Local Plan Review underwent the Regulation 19 Consultation from 20 January 2025 to 3 March 2025 which allowed the consultees to make representations on the proposed review of policies. A short summary of the issues can be found below, while the full redacted representations can be found here.

3.2 Key issue summary	
	Chapter 1 - Introduction
	The lack of a transport model and evidence have been raised by a representor, alongside encouragement of cooperation; additionally, expressing preference towards the adding of the A46 Coventry Junctions Scheme to the CASM 2041 Baseline.
	Some supportive comments were received regarding the Vision, One Coventry Plan and the support for redevelopment with the goal of improving the economy, sustainability and life quality in the area, however the lack of allocation of Central City Industrial Estate was questioned.
	Chapter 2 - The Vision
	Supportive comments were received from some representors regarding the fight against climate change, promoting sustainability, moving towards a zero-carbon economy and ongoing collaboration.
	A representation was received in general support of the Vision, however criticising policies DS1, DS2, JE1, JE2 and GB1 as contradictory to the Vision.

Chapter 3 - Overall Levels of Growth and the Duty to Cooperate

Policy DS1 -Overall Development Needs

Some comments were received regarding the Plan period being too short, the Plan having a retrospective start date and an early review being necessary, concerns about Duty to Cooperate regarding unmet need from neighbouring authorities.

The low provision of housing, including affordable housing, as well as overprovision of PBSA, and lack of Green Belt review were also brought up. An issue with the evidence base not sufficiently demonstrating exceptional circumstances was raised. An opposing issue was brought up, detailing that the proposed housing figure is too high and community needs are ignored.

Additionally, the issue of not meeting the employment land need and the allocation of Baginton Fields have been raised. Some comments were received regarding lack of details for modernisation and improving the quality of existing floor space on employment sites.

Some comments were received in favour of proposed delivery of sustainable transport on development sites. A critique of the SUEs destroying the environment, lack of protection of the Green Belt and lack of master planning was brought up.

Policy DS2 -The Duty to Co-operate and partnership working

Positive comments received regarding participation in Duty to Cooperate meetings, commitment to cooperate and ongoing collaboration. Furthermore, acknowledgement received in relation to the lack of space within the city.

Issues with the housing need number provided being too low and the exporting of unmet housing and employment needs to the Neighbouring Authorities before considering availability within the city were raised. Comments encouraging the release of sites from Green Belt were received. Lack of evidence regarding the unmet needs being met through Duty to Cooperate was brought up. Comments urging the reconsideration of new employment sites and new junctions were received. Issues regarding lack of transparency when it comes to Duty to Cooperate were raised.

The deliverability of sites was questioned by some representations. Comments were received regarding Coventry residents' access to affordable housing opportunities within Warwickshire.

	Some comments regarding a surplus of available housing land,
	encouraging de-allocation of land and taking on the Neighbouring Authorities' unmet need have been received.
Policy DS3 -	The need for a Coal Mining Risk assessment in the eastern part of
Sustainable	the city has been raised for both safety and environmental
Development	protection reasons. Some comments received regarding the lack of
Policy	policy mention regarding reduction of crime through planning. No
,	inclusion of Kersley in DS3 was raised.
	Some comments encourage more details to be included regarding
	the role of tilted balance. Comments received regarding more
	details about economic growth and tackling poverty. Low need for
	new housing and overprovision of PBSAs was raised.
	Some comments were raised praising the decarbonisation of the
	public transport. However, the issue of the Very Light Rail not
	being operational was brought up.
Policy DS4 -	Some comments were received in favour of the allocations and
Masterplan	comprehensive planning. Support received regarding the
principles	importance of green infrastructure provision in Masterplans and
	connectivity between Coventry City and Warwick District.
	Come comments called for the protection of the level context and
	Some comments called for the protection of the local context and design. An issue with the lack of masterplanning for Baginton
	Fields and no mention of the Very Light Rail was raised. The need
	to safeguard existing utility infrastructure onsite was outlined in
	some comments. Concerns raised regarding transport access to
	Eastern Green. Some comments received regarding references to
	unmet employment and housing need. The idea of mini-
	masterplans for the University campus was brought forward.
Specific	Some comments raised regarding the use of an alternative method
paragraph	for the housing targets and its impact on DtC, encouraging the use
comments	the New Standard Method (NSM) instead.
(non-policy)	- (
	Chapter 4 – Health and Wellbeing
Delia : 104/4	
Policy HW1 -	Comments supporting the wording of the policy were received. An
Health and Health	issue regarding the lack of an updated Health SPD was raised.
Impact	Some comments received regarding the disproportionality of the
Assessments	HIA being required for major developments. An issue was raised
(HIA)	regarding the references to an SPD within the Local Plan.
Specific	Support and offer of collaboration received.
paragraph	

comments (non-policy)	
	Chapter 5 - Jobs and Economy
Policy JE1 - Overall Economy and Employment Strategy	Stronger references to improving sustainable transport links were requested. Some comments raised the issue of employment land needs potentially being provided outside of Coventry's boundaries in contradiction to the objectives set out in the policy. An issue regarding the lack of inclusion of Westwood Business Park as an allocated employment site was raised.
	Some comments received highlighting the need for site allocation for employment close to the boundaries agreed through SoCGs and MoUs, and a forward-looking evidence base to avoid underestimation of local need. The employment land needs figure was questioned, as it may be too low. Modification of the wording to reference the University of Warwick SPD was requested.
	Support of protection of existing employment sites and sustainability was raised. Some comments received in favour of the opportunity to cooperate. Support of the wording around sustainable technologies, alongside a request for minor modifications to support modernisation of sites were received. General support received alongside a request for more explicit references around university contributions.
Policy JE2 - Provision of Employment Land and Premises	An issue was raised regarding the lack of a Green Belt review and unmet employment land need. Some comments received in support of protection of existing employment sites. The deliverability of sites was questioned. Concerns raised regarding Baginton Fields, requesting their deallocation and protection. Lack of new allocations being proposed and lack of clarity regarding committed supply were questioned.
	Comments received regarding the need for MoUs. Comments outlining general opportunities regarding sites were brought forward.
Policy JE3 - Non- Employment Uses on Employment Land	General support received regarding the protection of existing sites with some minor modifications regarding the strengthening of the wording.
Policy JE5 - Industrial and Storage /	An issue was raised regarding lack of clarity as to whether the policy refers to local or strategic needs. Comments received regarding lack of sufficient provision of employment land and windfall not being a means of addressing projected needs. A

Distribution Development	concern was raised over the potential impact of B8 sites and a request for stricter wording was received. Lack of clarity due to a typo was pointed out.
Policy JE6 - Tourism/Visit or Related Development	A request was brought forward to reference University of Warwick in the policy.
Policy JE7 - Accessibility to Employment Opportunitie s	An issue was raised with a lack of explicit reference to active travel links to employment.
Policy JE8 - Location of Research and Development (R&D)	A request for bigger flexibility on university sites was received.
Overarching comments (non-policy)	Comments received raising an inadequate supply and deliverability of employment sites, the predicted employment need number being too low, and slow speed of development over the recent years.
	Chapter 6 - Delivering Coventry's Housing Needs
H1 - Housing Land Requirement s	Comments considered that SM plus uplift not being used due to no sufficient demonstration of exceptional circumstances was not appropriate. An issue was raised over the approach limiting the supply of affordable housing and diversity of the existing house stock. Comments outlined that there is insufficient evidence to demonstrate compliance with the DtC. An issue was raised calling for release of more sites from Green Belt. The Plan period was questioned, highlighting that a minimum 15 years from adoption is ensured.
	Concern was raised regarding the Plan period looking back 5 years being a manipulation of figures to avoid meeting the housing needs. Some comments urged that Coventry take some of Birmingham's shortfall and no historic lapse rate being provided was questioned. Some comments were received regarding the possibility of the windfall being higher than the allowance set out by the Council and lack of consideration of future trends of windfall delivery.

Clarification requested regarding counting allocations, for example where a site is a carried forward allocation but also has consent or identified HELAA sites coming forward as windfall. Concern raised over lack of certainty around delivery of sites allocated in HELAA and deliverability of sites due to commitments with outline permission.

Comments questioned whether it is justified to use two different methodologies for one Housing Market Area and sub-region.

H2 - Housing Allocations

Green Belt Review requested. Viability concerns of brownfield sites for both full net zero and fabric only policies raised. Deliverability and viability issues raised regarding Friargate, Walsgrave Hill Farm, Central police station and 12 existing allocated sites. Removal of sites deemed undeliverable was requested, including Walsgrave Hill Farm, Carlton Road, land at Mitchell Avenue, Durbar Avenue and Jadine Crescent.

Request for a net figure for Spon End was received, as well as increasing of allocated capacity of the Keresley SUE. Objections to Whitefriars Car Park and Dale Building Tower Street received due to quantum of development sought and no plan heritage assessment done for the sites.

Heritage considerations and heritage impact assessments requested for Walsgrave Hill Farm, Sandy Lane, Central police station, New Union Street Car Park, Allesley Hotel, Spon End, CCS, Friargate. Level 2 SFRA requested for Spon End. Concern raised regarding wording of H2:3 not being consistent with national policy.

Amendment to the wording of "total dwellings" was requested, some comments requesting the change to be a "maximum", some to be "Assessed Capacity Number of Dwellings". Comments questioned whether the allocated housing numbers have been deliberately inflated to justify avoiding the release of green belt land.

Safeguarding of overhead line of the southern portion of Walsgrave Hill Farm requested. Concern raised over loss of playing fields and lack of an assessment at Mitchell Avenue and Baginton Field.

Support received regarding allocations of least environmental value. Land promotion for the next local plan received.

	Comments supporting approval of Sandy Lane were received. Returning of sites, such as some parts of Keresley SUE, to the Green Belt was requested if they do not have planning permission. Concern raised over possibility of total housing being surpassed in Keresley SUE. Identification of grey belt sites requested. Release and allocation of sites in Green Belt (such as HELAA Ref. WES- 003-23) was sought by some comments.
H3 - Provision of New Housing	Lack of evidence to adequately justify requiring NDSS and no flexibility allowed in applying NDSS and M4 standards were brought up.
	Inclusion of a lead in time period for all the requirements coming into force and set out what it means for approved outlines and their RM submissions were requested.
	An issue was raised with referencing standards in SPDs and other Council documents like the transport strategy within the policy is against the PPG, as SPDs, which have not been through examination or viability checked are there to support policy and not to create it or to have the same status as policy.
	Comments outlined that point 7 on self-build and community led housing is repetitious and should be included in point 1. Definition of ANGST standards and a cross reference to the HMO DPD was requested.
	Amendments regarding provision of wheelchair accessible parking was requested to include eventualities in which providing 10% of units to full wheelchair standard could lead to a need of more than 5%.
H4 - Securing a Mix of Housing	Issues regarding lack of flexibility for proposals that would not fall under the exceptions in part 2 (sites that are unviable, small sites with constraints, etc.) were raised.
	Comments received regarding referencing the HEDNA, outlining that instead the mix should be specified in policy.
	There was concern over the impact of BNG costs not being considered.
H6 - Affordable Housing	Amendment requested to add in a clarification regarding the affordable housing provision for PBSA development being subject to viability. Concern was raised over 1ha site threshold for the AH requirement and excluding areas of the city from the requirement.
	Inclusion of the Building Safety Levy in the policy was requested. An issue was raised with referencing standards in SPDs and other

	Council documents like the transport strategy within the policy is			
	against the PPG, as SPDs, which have not been through			
	examination or viability checked are there to support policy and not			
	to create it or to have the same status as policy.			
	Justification and deliverability of the policies were questioned in			
	regard to downgrading of contributions sought by EM11 if they			
	would enable more affordable housing. Concern raised regarding			
	delivery of the quantum of affordable housing.			
H7 - Gypsy	Help with an allocation from another council was received as an			
and Traveller	opportunity to fulfil DtC. Inclusion of secure by design principles			
Accommodat				
ion				
H8 -	Concern raised regarding possible conflation of Older Persons			
Specialist	Housing (OPH) and M4, as well as lack of justification for M4(2)			
Housing	and M4(3) requirements for OPH. Concern raised regarding 10%			
including	1 , , ,			
specialist	of dwellings to be M4(3). Clarification was requested regarding M4(3) standards.			
housing with	in (o) standards.			
elements of				
Care, Older				
Persons				
accommodati				
on and				
hostels				
H9 -	Clarification requested regarding whether the density figures are			
Residential	maximums or minimums. Concern raised regarding reliance on			
Density	brownfield sites potentially causing under-provision.			
H10 - Student	Concern raised over clarity of the policy. The level of change of			
Accommodat	use applications from PBSA and the new uses being approved			
ion	was questioned. An issue was raised stating that evidence should			
1011	be commissioned to determine whether the city needs the			
	alternative accommodation being proposed.			
	alternative accommodation being proposed.			
	Some representations considered the monitor and manage			
	approach to not be appropriate given the level of oversupply and a			
	more pro-active stance being required.			
	Comments received stating Westwood Business Park should be			
	retained to help address the Council's employment need.			
	Amendment requested defining "immediately adjacent".			
	Transmitted action actions in the dialety adjacent.			
	Justification for the locational based approach was requested.			
	Some comments received stating that campus and immediately			
	adjacent is too tightly drawn and the evidence does not justify the			
	high test of requiring exceptional circumstances outside these			
	might test of requiring exceptional circumstances outside these			

	areas. Request received stating that the campuses should be	
	shown on the proposal's map.	
	Concerns raised stating that requirements to be flexible / adaptable	
	in design are not justified and overly burdensome and costly for	
	developers. Some comments stated that points 3 onwards would	
	not be appropriate for PBSA provided on campus, especially the	
flexibility to be converted to C3 housing and dictation on the		
	number of studio and cluster flats. Clarification on points 3	
	onwards was requested – point 3 and 4 accept off campus only.	
	Concerns were raised regarding giving local plan status to SPDs.	
	Contact to Word Talood Togarding giving local plan status to or Bo.	
H11 - Homes	A cross reference to the HMO DPD was requested. Concern	
in Multiple	raised over the DPD not covering the whole city. A request was	
Occupation	received regarding inclusion of the Longford Ward in Article 4.	
-	Teceived regarding inclusion of the Longiord Ward in Article 4.	
(HMOs) H12 - Build to	Respoke accommodation arrangement regulated by the university	
Rent	Bespoke accommodation arrangement requested by the university to meet staff and student needs. A request was received to re-	
Rent	·	
	insert references to opportunities for Co-Living and Build to Rent	
1140	into the policy.	
H13 – Co-	An issue was raised regarding co-living being a sui generis use	
living	and onsite affordable housing not being applicable. Concern raised	
	regarding the 25% AH requirement and minimum unit sizes	
	unnecessarily restricting the market. Kitchen size and sharing	
	capped at 8 people was considered to be an issue going against	
	big communal arrangements. Onsite personnel being required was	
	raised as an issue. Secure by design was requested.	
Overarching	Comments received arguing that the total housing figure should be	
comments	35,693 and should be uplifted by 4,200. Some comments received	
(non-policy)	stating the windfall allowance should be higher and that some	
	allocations should be removed. A site was put forward within the	
	Green Belt.	
	Chapter 7 – Retail and Centres	
Policy R2 -	The addition of further detail in the policy regarding designing out	
Coventry City	crime and an evening policy was requested. Some comments	
Centre -	regarding focusing on retail frontages were received.	
Development	The support of green and blue infrastructure was received.	
Strategy		
Policy R5 -	A request for the addition of a specific reference regarding	
Retail	gambling and alternative financial services was received.	
Frontages		
and Ground		
Floor Units in		
defined		
centres		
3 3	I .	

Policy R6 - Restaurants, Bars and Hot Food Takeaways	A request for the addition of a specific reference regarding crime and fear of crime in relation to hot food takeaways was received.
	Chapter 8 – Communities
Policy CO1 - New or improved social, community and leisure premises	General support received with a request for amended wording, changing "education" to "school".
Policy CO2 - Re-Use of or Redevelopme nt of Facilities	General support received with a request for amendments regarding a bigger flexibility of land use for healthcare services.
	Chapter 9 – Green Belt and Green Environment
Policy GB1 – Green Belt	Concerns raised regarding meeting Duty to Cooperate due to a lack of SoCGs and MoUs and public information regarding partnerships. An issue was raised with the lack of a Green Belt Review, inclusion of a Rural Exception Site Policy and encouragement to release land from the Green Belt was received. Some comments encouraged returning some land to Green Belt, such as part of the Keresley site.
Policy GB2 - Safeguarded Land in the Green Belt	Comments encouraged the development of safeguarded land at Westwood Heath alongside Warwick District Council. Concern raised over safeguarding land with no development starting and encouragement to return it to the Green Belt. Some comments encouraged releasing land in South Coventry from the Green Belt. A concern was raised regarding the housing crisis and housing land allocation being postponed until a future Local Plan update. Some comments encouraged the provision to release land at Westwood Heath without a review of the Local Plan once it is considered for development by the SWLP. Comments received in support of no decisions being made with regards to allocation of land on the southern boundary of Coventry
Policy GB3 - Local Green Space	before the SWLP reaches an advanced stage. A request was received for clarification on the policy's interaction with BNG. Amendment proposed to exclude land at Gibbet Hill Road from the Local Green Space designation.

	General support received, with additional support extended to Local Green Spaces being identified on the Policies Map and inappropriate development not being permitted without the existence of special circumstances.
Policy GE1 - Green and Blue Infrastructure	A request was received for clarification on the policy's interaction with BNG. Amendments were proposed to include an explicit reference to support the Green and Blue Environmental Agenda and raises the need for a specific policy capturing the intent to deliver public realm changes along Cox Street. Concern raised over the Green and Blue Infrastructure evidence being considered out of date. Expansion on environmental principles to better protect trees and habitats was proposed.
	Support received regarding de-culverting hidden watercourses across the City Centre. Strong support received regarding provision, protection and enhancement of green and blue infrastructure, as well as green infrastructure being used as a way of adapting to climate change. References to Water Framework Directive were supported.
Policy GE2 - Green Space	A concern was raised regarding a possible conflict between policies GE2 and GE3. The allocation of H2:19 and JE2:3 and the possible loss of playing field land were raised as a concern. A request was received for clarification on the policy's interaction with BNG.
	General support received. Support received regarding deculverting hidden watercourses across the City Centre.
Policy GE3 - Biodiversity, Geological, and Landscape Conservation	A concern was raised regarding a possible conflict between policies GE2 and GE3. Clarification requested regarding protection of SSSIs from development, and differentiation between the mitigation and BNG delivery hierarchies. An issue was raised regarding the lack of reference to Local Wildlife Sites and Potential Local Wildlife Sites, a request to add more ambitious wording was received.
	A request was received regarding the exclusion of a reference to bird and bat boxes and replacing it with swift bricks instead. A request for amending the wording to allow exceptional permission for development to maintain and improve the railway. A request to reference the projects to improve public realm undertaken by the university was received. Amendments requested to require 20% BNG and deliver a rich mix of habitats.

	A concern was raised regarding the wording of the policy implying that the BNG should be over 10% and its influence on viability, and delivery of affordable housing.
	General support received. Support received regarding the reference to Local Nature Recovery Strategies, alongside a request for more detail.
Policy GE4 -	General support received.
Tree	
Protection	Amending the wording to allow exceptional permission for development to maintain and improve the railway was requested. Clarification was requested on the policy's interaction with BNG. Stronger mitigation strategies were requested, including giving weight to the LNRS and buffering standards. A Tree Canopy Target was requested to be added alongside a 30% target for land in nature recovery.
	Chapter 10 – Design
Policy DE1 - Ensuring High Quality Design	Comments received requesting modifications regarding car parking requirement in developments and cycle parking. Additionally, the prioritisation of local building materials in the policy was requested. Issues were raised with lack of reference to designing out crime and the status of SPDs. The needs of younger part of the population were highlighted.
	Support received regarding ensuring adequate waste storage and collection; the policy promoting safety; sustainability and green infrastructure.
Policy DE2 - Delivering High Quality Places	Comments received in favour of public art, however requesting a modification regarding the payment of a commuted sum in case the art is maintained privately. Support received regarding meanwhile uses, however a request for clarification regarding use investigation was also received.
	Chapter 11 – Heritage
Policy HE1 – Conservation Areas	Conservation Area review requested.
Policy HE2 -	General support received.
Conservation	
and Heritage Assets	Comments requesting modifications regarding designing out crime were received. Concerns raised regarding the sustainability of reusing heritage sites.
Policy HE3 - Heritage Park	General support received alongside a request of modification to mention renaturalisation of the river Sherbourne. A request to update the map has been received.

- Charterhouse			
	Constal support received. Minor modifications requested regarding		
Policy HE4 - Archaeology	General support received. Minor modifications requested regarding wording relating to previously unrecorded archaeology.		
Overarching	Request to review the conservation area appraisal process		
comments	received and an issue raised regarding the reason why the entirety		
(non-policy)	of the canal has special interest.		
	Chapter 12 – Accessibility		
Policy AC1 -	Support received for active travel and improvement of connectivity.		
Accessible	A reference to LTN 1/20 and safe travel was requested.		
Transport	Additionally, a request to add a reference to support active travel		
Network	training was received alongside the initiative to collaborate with the		
	university.		
Policy AC2 -	Concern raised regarding sustainable development of Baginton		
Road	Fields, possible congestion and lack of active travel. Clarification		
Network	requested regarding whether the required provision of EV charging		
	is based on the availability of viable means of power.		
	Support received for the requirement for the provision and		
	integration of intelligent mobility infrastructure.		
Policy AC3 -	Clarification requested regarding updates to mode shift targets and		
Demand	the definition of micro-mobility. Concern raised regarding the		
Management			
	comments encourage high quality active design. Concern raised		
	regarding car parking provision.		
	Support received regarding encouragement of sustainable travel.		
	Offer of collaboration received regarding a nuanced approach to		
_	parking provision, availability of EV charging and cycle hubs.		
Policy AC4 -	Amendment requested to include direct and desirable routes, and		
Active	a reference to desirable minimum widths in LTN 1/20. A reference		
Transport	to safe travel and e-scooters/e-bikes was requested. Amendment		
Provision	requested to specify clear cycle routes at the edge of the ring road.		
including	A concern was raised regarding impact on local habitats.		
Walking,			
Cycling and	Support received regarding further detail to cycle parking		
Micro	standards, and high priority being placed on walking and cycling;		
Mobility	advantages of active travel, such as health benefits, reduced		
Delia: ACE	congestion and pollution.		
Policy AC5 -	A request was received to add a clear definition of mobility hubs, a		
Bus, Demand	reference to safe travel and the Gigapark as part of the Very Light		
Response	Rail route.		
Transit and	Cuppert received regarding the inclusion of Vers Light Deil		
Rapid Transit	Support received regarding the inclusion of Very Light Rail,		
	promotion of sustainable transport and demand for improved		

	accessibility in the policy. Information about sharing the survey results regarding active travel was received from the university
	alongside an offer of collaboration.
Policy AC6 - Rail	Adding additional guidance, such as the West Midlands Strategic Advice 2022, was requested. A concern regarding not listed transport projects arising and a request to add that the list may be subject change were received. Adding a reference to safe travel was requested.
	Support was received regarding the ambition to improve rail and rail station connectivity on a regional and local scale, and the impact on reducing carbon emissions.
Policy AC7 - Freight	Support received regarding parking and facility provision for HGVs, promotion of sustainable delivery methods, as well as ambition to reduce HGV traffic. Concerns were raised regarding air quality, HGV movements, poor public transport and its impact on job connectivity, traffic and pollution impacts tied to B8 sites and cross-boundary applications. Further concerns were outlined regarding lack of mention of possible mitigation strategies and references to the WMSESS threshold of 25ha.
Overarching comments (non-policy)	A request to add a reference to LTN 1/20 was received. Support towards Advanced Stop Lines received alongside concern that these would not be sufficient on their own. Support was received regarding pedestrian improvements and prioritisation of active travel.
	Chapter 13 – Environmental Management
Policy EM1 -	General support received regarding creating energy from waste
Planning for	-
Planning for Climate	General support received regarding creating energy from waste and ambitious goals in order to reach net zero.
Planning for	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date.
Planning for Climate Change Adaptation	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop
Planning for Climate Change Adaptation Policy EM4 - Flood Risk	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to
Planning for Climate Change Adaptation	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop
Planning for Climate Change Adaptation Policy EM4 - Flood Risk	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation. A request was received for clarification on the policy's interaction
Planning for Climate Change Adaptation Policy EM4 - Flood Risk Management Policy EM5 - Sustainable	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation. A request was received for clarification on the policy's interaction with BNG. Including a reference to the protection of controlled
Planning for Climate Change Adaptation Policy EM4 - Flood Risk Management Policy EM5 - Sustainable Drainage	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation. A request was received for clarification on the policy's interaction
Planning for Climate Change Adaptation Policy EM4 - Flood Risk Management Policy EM5 - Sustainable Drainage Systems	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation. A request was received for clarification on the policy's interaction with BNG. Including a reference to the protection of controlled
Planning for Climate Change Adaptation Policy EM4 - Flood Risk Management Policy EM5 - Sustainable Drainage Systems (SuDS)	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation. A request was received for clarification on the policy's interaction with BNG. Including a reference to the protection of controlled waters in the context of SuDS was suggested.
Planning for Climate Change Adaptation Policy EM4 - Flood Risk Management Policy EM5 - Sustainable Drainage Systems	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date. General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation. A request was received for clarification on the policy's interaction with BNG. Including a reference to the protection of controlled

Draviously	Support received regarding references to the Water Framework	
Previously	''	
Developed	•	
Land		
Policy EM7 -	A suggestion to include walking and cycling as part of low-	
Air Quality	emission transport was received.	
7 m Quanty	composit was received.	
	Consorrancia de la consulia de consulia de consulidad de la Air Occalita (CDD)	
	Concern raised regarding compliance with the Air Quality SPD	
	being a Local Plan policy requirement.	
Policy EM8 -	Support received regarding consideration of waste management	
Waste	land suitability, prioritisation of waste prevention, recycling and	
Management	safeguarding of existing waste management sites.	
g		
	Suggestion received regarding assessing need for the	
	Suggestion received regarding assessing need for the	
	development of additional waste management capacity within the	
	Coventry area over the Plan period.	
Policy EM10 -	Request received to remove references to the Coal Authority in the	
Non Mineral	policy and instead add signposting to its Permitting and Licensing	
Development	teams, and the need for an Incidental Coal Agreements to remove	
in Mineral	coal from site during development works.	
Safeguarding	g acrosspinion normal	
Areas		
	Concern reject regarding the impact of the policy requirements	
Policy EM11 -	Concern raised regarding the impact of the policy requirements,	
Energy	including high standards relating to energy infrastructure, on	
Infrastructure	viability of development. Additionally, it was questioned whether	
	the evidence justifies the ambitious standards. The Written	
	Ministerial Statement (2023) was raised in some of the	
	representations, pointing out that there is no expectation to set	
	local energy efficiency standards going beyond current or planned	
	building regulations. Possible conflict with the definition of	
	regulated embodied carbon outlined in policy EM1 was highlighted.	
	, , ,	
	Potential conflict of part 8(a) with GDPR was raised.	
	Support received regarding the requirement to include significant	
	renewable energy generation in new developments, and	
	community energy schemes.	
Policy EM12 -	A request for more flexibility regarding specific measures for	
Reducing	improvements on Part L emission rates. More detail on	
operational	methodology was requested.	
carbon in	modicaciogy was requested.	
	Comments of augment for resulting benefit reserved	
new build	Comments of support for mutual benefit received.	
non-		
residential		
development		

Policy EM13 -	Some observations regarding site constrains and possible		
_	differences in effectiveness hierarchy were received. Concerns		
Overheating	•		
in new	raised over the acceptability of specific assessments.		
buildings			
Policy EM14 -	Support received regarding minimisation of waste and prioritization		
Embodied	of waste prevention and reuse.		
carbon and			
waste	Concern raised regarding a single target being potentially under		
	ambitious or overly challenging depending on the development;		
	and the requirement for a whole-life carbon assessment being		
	required for all major developments being disproportionate.		
	Clarification was requested regarding how to demonstrate		
	compliance with planning for a building's end of life.		
Policy EM15 -	Observations received regarding expected amenity levels being		
Noise	different in various parts of the city.		
Overarching	Offer of cooperation received to further green the city. A request to		
comments	add a policy to safeguard against development where a supply of		
(non-policy)	minerals is present.		
	Chapter 14 – Coventry City Centre		
Policy CC1 –	An amendment to include references to the reduction of crime and		
Coventry City	fear of crime was received.		
Centre			
Development	Supportive comments received regarding sustainable drainage and		
Strategy	the Water Framework Directive.		
<u> </u>	Chapter 15 - Infrastructure Delivery, Implementation and		
	Monitoring		
Policy IM1 -	Comments received raising issues with the infrastructure		
Developer	contributions interfering with the provision of affordable housing.		
Contribution	Specific references to crime, safety and emergency services, as		
s for	well as health infrastructure and funding were requested. Adding		
Infrastructure	explicit references to monitoring and housing supply was		
	requested.		
	Supportive comments received regarding provision of necessary		
	infrastructure.		
Overarching	Issue raised with the monitoring method. Comments received		
comments	regarding the necessity of key milestones for water waste		
(non-policy)	infrastructure, foul drainage hierarchy and the Water Company		
	consultations in amber and red areas.		
General	Some comments were received outlining that the proposed		
comments	housing numbers are too low, with some arguing the opposite.		
Comments			
(not	Addressing 35% uplift and lack of a Green Belt Review, as well as		
	Addressing 35% uplift and lack of a Green Belt Review, as well as using a non-standard calculation method; proceeding under		
(not submitted as	using a non-standard calculation method; proceeding under		
(not submitted as policy	using a non-standard calculation method; proceeding under transitional arrangement and raising Plan period, and Duty to		
(not submitted as	using a non-standard calculation method; proceeding under		

attention was brought to new government guidance regarding BNG and LNRS, and their potential impact on the Local Plan.

Comments regarding need for further addressing the needs of vulnerable communities, fighting against climate change and flooding. More focus should be put on attracting new industries, ensuring affordability and improving granular infrastructure, as well as congestion, especially when it comes to new developments. Infrastructure planning should be prioritised, including healthcare, addressing road congestion and school capacity issues.

Arguments were raised towards releasing more land from Green Belt, however arguments for returning land to Green Belt were also made. Review of Longford's conservation status was requested. It was requested that a new policy CC2 is created. Sustainable development of universities noted. Some comments were put forward regarding concerns in relation to consistency with the national heritage policy, i.e. ensuring that brownfield land is prioritised for redevelopment for employment purposes.

Some sites were put forward for promotion. Active travel being strengthened by policies was noted and approved with an encouragement towards changes to phrasing in order to put greater priority for walking, cycling and public transport was noted. The opportunity for growth promotion is encouraged by some representations. Positive comments were received regarding the soundness of the plan. Proposals to improve health provision were regarded positively and close collaboration with the NHS ICB was encouraged. Public transport links to healthcare services and the importance of non-physical aspects of health improvements (air quality, green spaces, etc) were highlighted.

It was proposed that policy GB1 should be split into two parts and a list of sites should be removed, however the brownfield first approach should remain.

Concern was raised over the Eastern Green SUE, naming of "protected green spaces", possibility of areas of high ecological importance being built on, oversaturation of student accommodation, ambitious active transport proposals and possible boundary review for Allesley Parish not being acknowledged.

Additionally, lack of consideration of wildlife, green infrastructure and biodiversity was objected to. Objections received regarding taking Warwickshire's unmet housing need if Coventry's Green Belt would be used. Overprovision of housing in Eastern Green

	and Keresley SUEs, inadequate drainage system for the Richborough Estates as well as lack of a masterplan for Keresley and access systems to the SUEs were raised as concerns.
Appendices	Concern raised over an Appendix referencing NPPF 2023. Issue raised over the lack of ambitiousness for cycle parking; car parking ratios with dwellings; and monitoring not being effective. An issue was raised with too much car parking being provided for staff. It was questioned if the provision of adequate healthcare infrastructure would be sufficient.
	Cooperation to better understand and clarify points in the Infrastructure Development Plan was offered.

	Sustainability appraisal key issue summary
Sustainabilit y Appraisal	Concerns were raised regarding whether the SA sufficiently considers the impact of the chosen housing requirement, site allocation strategy and the failure to deliver the housing need; as well as failure to consider a dispersed housing strategy. Some concerns were raised regarding the evidence; consideration of environmental impacts on Local Wildlife Sites and Potential Local Wildlife Sites and allocation of sites in Green Belt. Some issues were raised regarding effective protection of sustainability on allocated sites and provision of BNG, as well as reviewing brownfield sites for employment use.
HRA	Some observations were received regarding the need for traffic control measures. A Green Belt Review and subsequent revised SA were requested. Some representors have raised issues with the accuracy of the
Screening Report	report, including use of terms, hydrological links with the Severn Estuary, and main rivers. Some representors provided general comments in support of the report's conclusions regarding Conservation and Protection areas.

3.3 Conclusion

The above process satisfies Regulation 22 through providing a summary of key issues under Regulation 19. The information regarding who and how was invited to make representations, when the consultation took place, summary of main issues and how any representation under Regulation 18 have been considered has been

provided in the Regulation 18 Consultation Statement which can be found in Appendix 1, further satisfying Regulation 22 (1)(c).

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

Coventry City Council
Coventry Local Plan Review
Issues and Options Consultation
Regulation 18: Consultation Statement
Sept 2024

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1. Introduction

- 1.1 Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017. The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing, rewriting or deleting, to reflect changes to national policy or other matters.
- 1.2 As part of this process, the Council undertook an Issues and Options Consultation between Tuesday 18 July and Friday 29 September 2023. This offered the opportunity for comment on our ideas for updating the plan, in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012. This was supported by the Sustainability Appraisal Initial Report and Equalities & Health Impact Assessment, on which comments (representations) could also be made during the consultation period.
- 1.3 The purpose of this consultation statement is to set out how the Council undertook this consultation and the findings that emerged from it. The following document summarises how the Council consulted, who was invited to make representations, the comments that were received and how we have responded to these in the Local Plan Review.
- 1.4 The Council received 930 separate responses resulting in 1719 individual representations during the Regulation 18 consultation. This statement summarises the main comments received and the Councils response to them when reviewing the local plan.
- 1.5 This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012. This states that a Consultation Statement has to be produced to show:
 - Which bodies and persons were invited to make representations under Regulation 18;
 - How those bodies and persons were invited to make representations under Regulation 18;
 - A summary of the main issues raised by the representations;

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

2. Consultation Approach

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

Promotion of the consultation

- 2.2 Consultation on the Local Plan Review Issues and Options (Regulation 18) document took place between 18 July 2023 until 29 September 2023.
- 2.3 The Regulation 18 consultation was promoted through a variety of means.
 - Formal notifications of the consultation were sent via the Council's consultation
 management system to the specific and general consultation bodies set out in
 the SCI as well as other individuals and organisations on the Councils Local
 Plan consultee database that requested to be notified. Follow-up emails were
 also sent out when the consultation was extended (the deadline was initially
 12th September and was extended to 29th September 2023).

¹ https://www.coventry.gov.uk/downloads/file/37080/statement_of_community_involvement_july_2021

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

Consultation events and Hard to Reach Groups

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

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

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

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



- 2.6 A webinar was held for the public on 11th September 2023 which was attended by 12 people from the local residential and business community.
- 2.7 Hard-to-reach groups, who may be affected by the review of the local plan, were proactively invited to discuss the review with officers in a way which was best suited to their needs including targeted workshops, and / or attendance at their own group meetings and venues. The outcomes are set out in Section 3.

Feedback

- 2.8 Comments from all respondents could be provided in various ways, including:
 - · Comments forms (available both online and hard copy versions);
 - Online, directly via Inovem (the Council's consultation system);
 - Submission of letters and emails.

3. Responses to the Consultation

- 3.1 As a result of the methods outlined in Section 2, a total of 1719 comments were received against all questions by 930 separate respondents during the consultation.
- 3.2 Comments were received from a wide range of individuals and organisations including statutory and non-statutory consultees, special interest groups, individual residents, developers and their agents.
- 3.3 A summary of all responses submitted and how the review has responded to these is set out later in this chapter (*Table 1*). In terms of the various workshops and meetings held these are summarised in the below paragraphs.

Hard to reach groups

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

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

- 3.5 Key points raised included concern over regeneration and the relocation of businesses, a need for well-funded community spaces, the need for decent affordable housing of the right size to meet a variety of needs, the need to maintain existing stock (for example broken lifts), lack of amenity space in housing, long waiting lists, the need for well-maintained green space, andtoo much student accommodation.
- 3.6 Council's response: whilst some issues are outside of the scope of what the Local Plan can do (e.g. maintenance issues), the need to improve building standards and support the provision of community and green spaces as well as ensuring that the right

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

- St Francis of Assis Church, Radford (Providing support on employment, skills, ESOL, community support, volunteering, a foodbank and a social supermarket)
- 3.7 Concerns were raised about the lack of council housing, the amount of student accommodation and the number of Homes in Multiple Occupation (HMOs).
- 3.8 Council response: the need to rebalance the type and amount of housing including student accommodation is recognised and forms an integral part of the review and update of housing policy. In terms of the issue of HMOs the Council is producing a separate Development Plan Document to manage planning policy on this issue to ensure standards are improved and has also introduced an 'Article 4 Direction' to manage the situation in those wards where the situation faces the most pressure.

Earlsdon Retirement Village

- 3.9 Comment was made about uneven and badly maintained pavements, tree routes, poor lighting, parked cars on pavements and dropped kerbs in wrong places makes mobility hard for elderly people, especially those with mobility scooters. There was also concern about the city centre and local shops, which are shutting and there is a lack of independent shops.
- 3.10 Council response: maintenance and traffic enforcement issues sit outside of the local plan, but the relevant teams have been made aware of the comments. The local plan policies on design, accessibility and traffic management are being reviewed and updated. In terms of the comments about shops shutting down (and the lack of independents shops) much of this is due to changing shopping habits and market forces. However, the local plan policies will encourage a variety of uses in town centres and will also support improvements to the local environment to help them attract footfall.

Multi-Faith Group

- 3.11 The group considered the creation of a religious quarter around Hillfields, better linking up and making it easier for people from outside the area to visit the different significant places of worship. It was commented that there is a lack of housing for large families. There are parking problems on inner city streets especially when large events happen, and electric vehicle charging points are now taking room up. It can be hard to get permission to extend a place of worship, so sites further afield have to be sought. New housing developments should include community space and places of worship.
- 3.12 Council response: the need for religious and community facilities is noted and the policies of the plan are being reviewed to ensure they are flexible to meet a variety of needs. Parking and travel policies are being updated so they are more reflective of the Council's adopted transport strategy. In terms of housing the policies are to be updated to be reflective of evidenced local need.

Disability Equality Action Party (DEAP)

- 3.13 The group commented that there is not enough housing for people with disabilities. All properties should be wheelchair accessible. Pavement design, signage and the distance between disabled parking and places is crucial to allow disabled people to move and navigate traffic as easily as able-bodied people. Accessible public toilets should be an obligation of all planning permissions along with cameras and good lighting. Housing developers need to consider from the outset that all facilities provided are inclusive, such as gyms, which are not always suitable for people with disabilities.
- 3.14 Council response: the issue over housing accessibility and adaptability is being addressed through reviewed planning policy including the introduction of wheelchair-accessible standards. In terms of the other comments, these are being considered through a review of the design policies of the Local Plan.

Homelessness Forum

3.15 Following a discussion there was broad support for the proposed changes to policies H4, securing a mix of housing and H6, affordable housing to reflect and promote the councils preference for social rent. It was agreed that all major developments should demonstrate how health issues have been addressed and that a checklist would be a good idea.

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

WMCA Homelessness Unit

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

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

Business and community

The Federation of Small Businesses (FSB)

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

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

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

Other events

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

Comments from individuals and organisations

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

Toble 1	Pogulation	10 and CA	Pachaneae	Summary Do	nort

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

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

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	high (or low), a new MoU being needed, any figure needing to be a minimum, need to consider the impact of emerging new data sets, original figures being overestimated and SUEs not being needed, separate out the student population, the 2021 Census is not the answer to everything.		
Q6 Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider? [housing]	Context: The three scenarios presented for the plan period 2021 were: • the Government default standard method using 2014 population projections (63,760 dwellings / 3,188 pa) • The HEDNA method using 2021 census data (39,280 or 1,964 pa) • The HEDNA method with the 35% uplift removed (29,100, or 1,455 pa) Responses (29): there were fewer responses to this question than the previous question which specifically focused upon the 35% uplift. There was a clear preference for using the HEDNA method (favoured by 10 out of 29 responses). There was little support for the highest figure (the use of the 2014 projections) with only a couple of developer responses preferring this. A couple of respondents felt all figures were too low, and some felt they were all too high but did not offer alternative methods. One respondent did propose an alternative way of calculating need, supported	The Council considers that the HEDNA method is robust and is an appropriate method upon which to base plan making, this has been further reinforced by an additional report for Coventry. It is considered that the Local Need figure is appropriate as it is assessed based on local data: the uplift is unevidenced and arbitrary and bears no relevance to local context. It is not considered appropriate for some of Birmingham's growth to be addressed as Coventry sits in a different Housing Market Area, as defined by the HEDNA in line with national planning guidance.	Proceed with option 3 (HEDNA local need with no uplift).

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	by substantial documentation. Another suggested that the sub regional market signals study should be used. A number of developers proposed that the plan should be accommodating some of Birmingham's growth. Some commented that by deleting the 35% uplift as an option, this was a departure from the standard method. A couple of respondents cited the need for a student demand study. Others advised that high growth was needed to help with delivering sufficient affordable housing. There were also comments on the need for infrastructure, and a need to focus more on the north of the city as there was already a lot of investment in the south.	Whilst in terms of monitoring housing numbers the Council is allowed to include PBSA (in line with government reporting methods) it is agreed that more evidence is needed on the student market, and this has been prepared. In terms of appropriate levels of growth and where this will be accommodated (and infrastructure needs in relation to this) this has been considered as part of further assessment work.	
Q7 Do you have any comments on the overall Employment Land Needs for Coventry?	Context: The employment land needs were taken from the HEDNA, 8.5ha office, 147.6 ha general industrial excluding strategic B8, and 551 hectares strategic B8 (large scale warehousing /logistics) but across the Coventry and Warwickshire sub region. Responses (29). These were almost evenly split between those who supported (10) and did not support (9) the HEDNA figures although many responses did not comment either way but instead offered a range of comments. Some respondents wanted more growth, some less, there was concern about economic imbalance	In terms of the reference to the wrong figures being used in table 4 (which lead to the conclusion of an oversupply) this is acknowledged to be the case and has been corrected. The issue of the emerging evidence on strategic employment (88 and B2) has been considered. Updated evidence has informed revised figures including the West Midlands Strategic Employment	Figures updated in line with evidence.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	with the 'gig economy', large sheds, aligning economic and housing growth, using / not using Green Belt, overestimating need due to hybrid working, not clear on what is being proposed. Some comments referred to the emerging regional evidence and wanted to see strategic B8 and strategic B2 addressed by the plan. It was also highlighted that the oversupply figures in table 4 are incorrect as they are sourced from Table 9.4 of the HEDNA which illustrated an option which the HEDNA dismissed.	Sites Study (WMSESS), the Coventry and Warwickshire WMSESS / HEDNA Alignment Report and the Coventry Employment Land Review and Office Market Addendum.	
Review of Policy DS2 (Du	ity to Co-operate)		
Q8 [Duty to Co-operate policy] Do you have any comments on our proposed amendments to Policy DS2?	Context: The consultation proposal was to update the policy (e.g. to replace the now defunct LEP references with the WMCA, improve references to joint projects and monitoring). Responses (33). The majority agreed with the updates, there was no disagreement. Some used the question to promote particular sites, or comment on procedural issues under the DtC such as producing an updated MoU. It was also commented that replacing the reference to the LEP with the WMCA needs consideration as the roles are very different.	It is agreed that the roles of the LEP and WMCA are very different so it is proposed that reference should be added in about 'partnership working' as this goes beyond the Duty to Cooperate bodies and provides future resilience in line with any changes which may occur.	Include a reference to partnership working in policy.
Review of Policy DS3 (Su	istainable Development)	1	

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

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

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

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

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
		https://www.gov.uk/government/organisations/land-registry.	Employment Sites.
Review of Policy JE3 No	n-employment uses on employment land		
Q18: Do you have any comments on our proposed changes to JE3 Part 1a?	Context: Policy JE3 relates to non employment uses on employment land. The consultation suggested that, given the Government changes to the definition of 'employment' the policy is now too restrictive and should now reflect a new local definition (see Q12). The consultation also proposed that marketing should not be required if a site is clearly not suitable for employment use in line with specific criteria. Responses (13). 10 agreed with the changes, none disagreed. Some suggested that the 'and' could be changed to 'or', for consistency and the exception should be split into two separate exceptions (i.e. now 5 in total). In terms of marketing, it was proposed that clear guidelines are needed, stipulating the length of time for collecting and submitting evidence. The 2018 Market Signals Study was cited in terms of protecting allocations. Other comments received related to the need to protect employment land, not to leave sites derelict, to prioritise brownfield and to ensure high quality redevelopment.	Definition of employment land to be provided in explanatory text to the employment chapter. Policy should be updated in line with recommendations of the Employment Land Review (2024). The ELR advises that the marketing guidance remains fit for purpose.	Update policy to tak account of Employmen Land Review including reference to how Key Employmen Sites should be assessed.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q19: Do you have any other comments regarding policy JE3?	Context: This question offered the opportunity for further issues to be raised on policy JE3. Responses (5). Some made comments on the need to focus on sustainability, some felt the need for more clarification and to repeat the definition of 'employment' in policy. Need to be explicit about which definition of 'employment land' is being used. Need to allow offices outside identified centres to be redeveloped for non employment uses without the need to comply with part 2 of the policy. If a site meets the tests in part 1a it shows it is unsuitable for employment so part 2 should not apply and the policy should be amended to reflect this.	Comments noted: employment land definition to be included in explanatory text to the chapter. Office policy covered in JE4 however Part 2 of this policy is still considered to remain an important part of the assessment process for applications.	Changes to JE3 noted above.
Review of Policy JE4 Loc	ation of Office Development		85
Q20: Do you have any comments on our suggestions for proposed changes to Policy JE4? [location of office development]	Context: Policy JE4 relates to the location of office development. The consultation proposed that the policy should be updated to reflect national use class order change, and to remove the reference to Impact Assessments as this is no longer part of national policy. It was also proposed to remove permitted development rights from major office developments, not to have to require offices to be close to primary routes on the highway network, and to change reference from 'large scale' to 'major'. Responses (12). Of those saying they agreed (5) it was commented that policies JE3 and JE4 need	Policy to be updated to reflect national change as proposed. In terms of location this would be applied in line with the centresfirst approach of the NPPF and centre boundaries are identified through the retail policies of the plan. The evidence base (Employment Land Review Office Market Addendum) has now informed the approach to the review of office	Introduce reference in policy title to type of office development to ensure flexibility in the market. Delete impact test.

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

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	linked to the green technologies industries and their potential educational role.		the aims and objectives of Destination Coventry.
Q25: Do you have any other comments or suggestions relating to tourism and Policy JE6, including evidence if this is applicable?	Context: This question supplemented Q24 above in case there were other comments people might have. Responses (0). No comments received on this question.	No comments received.	N/A
Review of Policy JE7: Ac	cessibility to Employment Opportunities		
Q26: Do you have any comments on our view that this policy [JE7] remains up to date?	Context: Policy JE7 relates to accessibility to employment opportunities. The consultation suggested that the policy was up to date although the reference to CIL should be replaced by the more flexible reference to 'developer contributions.' Responses (4). It was agreed the reference to CIL should be changed as proposed. Comments were received on the need for maintaining public transport, suggested text to read 'especially those living in Coventry's most deprived areas and communities' and one respondent wanted to see developer contributions limited to transport infrastructure (in relation to the reference to 'accessibility').	The comments are noted. However, it is considered that the current policy already references those in the more deprived parts of the city. Limiting contributions to transport only would not give sufficient flexibility to enable the policy to respond to contextual issues and circumstances.	Minor change to replace CIL reference with 'developer contributions ,'
Chapter 5: Housing		1	

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Review of Policy H1 Hou			Laconomic
Q27: Do you have any suggestions which can help us meet our housing need within our area? A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1 B. An area you think could be densified while still achieving a high standard of living? Please provide as much detail as you can C. A site you would like us to investigate to see if it might be suitable for housing? Please provide as much detail as you can D. Another suggestion or comment – please provide detail	Context: This question related to the review of Policy H1: Housing Land requirements. It links to the level of growth question (see Q5 and Q6 in the review of Policy DS1) but this policy specifically relates to how an appropriate level of growth might be delivered. The question therefore invited site submissions (call for sites), ideas for densification, ideas for sites which might come forward or other comments. Responses (34). Through the consultation the following sites were submitted proposing development: 2 0 brownfield 3 greenfield 1 on Local Green Space 26 Green Belt 2 for the safeguarded sites In terms of the densification aspect 'gentle densification' was felt to be appropriate to the edges of the ring road, around transport hubs and in relation to City Centre South. In relation to other suggestions, comments were general and reflected people's views on whether Green Belt should or should not be used, varying views on PBSA including locational needs (close	A further call for brownfield sites was launched to run from 27/11/2023 to 22/01/2024. Assessment work and policy direction have informed proposed allocations. Densification has been considered and the new Density Study has shaped the plan review in terms of new opportunities. PBSA and other housing needs are considered later in this chapter. Comments on Biodiversity and brownfield are noted, and this is addressed through Biodiversity Net Gain.	Include new allocations in plan.

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	on the Green Belt and appropriate levels and location of growth.		
Review of Policy H3 Pro	vision of New Housing		8 1
Q29: Do you have any comments, including supporting evidence which can help us address introducing standards which can help us proactively address climate change in terms of residential development?	Context: This question related to whether or not new standards could be introduced Responses (33). Responses varied. Generally, responses from the development industry commented that standards were already set by Building Regulations (including incoming further regulations), and there were concerns about viability. Some also commented that in covering standards in this chapter / policy there would be confusion / duplication as the issue is also being addressed through the environmental management chapter. Several respondents made comments about the need to address climate change and net zero providing examples e.g. insulation, energy, water technology.	The issue over duplication with other policies is acknowledged and so this will be addressed through the review of the policies in the Environmental Management chapter.	Address through the EM policies section.
Q30: Do you have any comments on our proposals for introducing new policy on amenity?	Context: The question sought to gauge views on strengthening references to 'amenity', and whether Building for a Healthy Life principles should be utilised.	The policy context has been reviewed as 'amenity' could be interpreted in different ways. The points about liveable neighbourhoods (or similar) are noted and it is important to	Policy amended to include new standards fo design, access to

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Regulation 18 – Consultation Statement

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

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

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

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

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

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	housing, the potential application of a cost / benefit approach, set a high bar for demolition and rebuild, widen references to sustainable neighbourhoods and net zero and energy efficiency.		
Review of Policy H6: Affo	ordable Housing	1	
Q42: We propose that the policy should be updated to reflect the Council's preference for Social Rent as opposed to Affordable Rent. Do you agree A. Yes – please comment further if you wish B. No – please explain	Context: affordable housing and the nature of its delivery is defined in the NPPF however there is still some local flexibility which was explored here. Responses (25). 9 stated that they agreed, citing concerns that other models were unaffordable despite the definition. 2 disagreed, stating that the need will vary over the plan period and a rigid policy will not enable evolving demand to be met. The majority of responses (16) made a variety of points, some asking where the evidence and justification is for this, the HEDNA should determine mix of tenures, there is a need for flexibility, more homes are needed to deliver sufficient affordable housing, there is a need to provide housing for key workers as set out in a study by PWC (July 2019).	Further work after the Regulation 18 consultation undertaken regarding viability has informed the review of the policy to express the preference for social rent.	Add in preference for social rent.
Q43: Do you have any comments on our proposals regarding affordable home ownership? What	Context: This question was asked because the council believes that affordable home ownership should be affordable with the principle that it is intended for those who cannot meet their need through the open market so it is considering how	Further work after the Regulation 18 consultation undertaken with housing team and regarding viability has informed the review of the policy.	Policy wording updated including reference to

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Review of Policy H8: Car	e Homes, Supported Housing, Nursing Homes ar	d Older Persons Accommodation	1
Q46: Do you have any comments on the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards)? Please provide evidence to support your views	Context: these are optional standards which go beyond standard building regulations, but which could be added to policy if appropriately evidenced. Responses (26). Comments varied with some feeling this should be supported but others stating there is no evidence (or evidence is required if the council wishes to pursue introducing additional standards). Some comments suggested that this should apply equally to market and affordable homes, that this is not just an 'older persons' issue, that adjustments need to be focused on existing properties, that all care homes and older persons accommodation should comply with these standards and should include disabled parking, that viability testing is needed, that adapted housing does not provide onsite support, care and companionship, that wheelchair users should not be assumed to be elderly and dealt with under a housing for older people 'tag'. Should use the Three Dragons 2013 report produced for the Retirement Housing Group. One commented that it is not clear how the HEDNA has taken into account the needs of the over-85s	The comments were noted, and the viability report was requested to assess the potential for introducing these standards. The breadth of the policy has been widened to ensure that its clearer a range of specialist uses are included.	Update policy in line with evidence.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q47: Do you have any other comments on our review of Policy H8?	Context: The question was based around potential locational requirements, building for a Healthy Life criteria, different use classes, affordable housing contributions and viability. Comments were invited to encourage as much feedback as possible in this evolving sector. Responses (8). Responses were varied, some felt flexibility was key with policy encouraging specialist accommodation (including new models which might emerge over the plan period) while others felt a criteria based policy was more suitable. Viability testing was cited as was the needed for sustainable neighbourhoods and for high standards of energy efficiency.	Comments are noted. Policy to be expanded to take more account of the needs of the sector and to ensure flexibility.	Policy expanded.
Review of Policy H9: Res	idential Density		
Q49: Do you consider: A. The policy is up to date and sets sufficient standards to maximise capacity already B. The policy could be amended to increase minimum density levels in certain locations outside the ring road? (please explain and provide evidence where applicable)	Context: Policy H9 currently sets minimum density standards of 35 dwellings per hectare (dph) outside the ring road and 200dph within it. The question sought to gauge views on increased opportunities for densification. Responses (21). Responses were split between those who felt the policy is up to date and those who felt it should be updated. Some felt some areas outside the ring road (but still 'city centre') were appropriate for densification whereas other commented that they thought the current figure of 200dph was already too high. It was commented that there needs to be flexibility as sometimes	Density work has since been undertaken to assess what might be realistic and deliverable in various locations, to inform site assessment and capacity work and to inform policy revision.	Update to reflect the evidence (Density Study).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	Responses (22). Respondents were split equally between those who cited agreement and those who did not (both 6). Those objecting felt policy was sufficient, that viability testing would be needed and that the reference to 'veteran tree quality' is not an industry standard and is confusing. Those supporting, or offering comment advised that connectivity is essential (requiring bird boxes needs access to commuting routes for wildlife), should link to Natural England's Benefits from Nature tool, should link to the Local Nature Recovery strategy and Biodiversity Net Gain plan, should not top street trees (to protect the canopy), protect trees, do not use whips on new estates, agree with offsetting on council land but not private sites, protect irreplaceable habitats, habitat survey river metric should be 10m from red line boundary, medieval ridge and furrow should be given more protection.		
Review of Policy GE4: 1		·	2
Q77: Do you have any comments on our review of Policy GE4 Tree protection?	Context: A number of changes were proposed in the consultation which it was felt might strengthen policy GE4 including buffer zones (ancient woodland), compensatory measures and planting specifications. Responses (13). Of these, 6 supported the changes, 3 objected, stating that it should accord with national policy, that 'TPO quality' should not	Comments noted. Some proportionate additions to policy recommended to provide clarity and strengthen links to the SPD.	Update to provide additional clarification and to strengthen policy and

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

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

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

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

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

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

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

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	and uses would be needed, that district heating should be referenced and that the role of canals should be considered.		
Review of Policy EM2 Bu	ilding Standards		1
Q94: Do you have any comments our suggested policy proposals in that Policy EM2 needs to be deleted and replaced with an up-to-date new policy?	Context: it was considered that this policy should be deleted as it was out of date, and should propose more challenging building standards as well as a suite of options in relation to biodiversity. Responses (21) 14 respondents expressed support, two objected. A series of comments were also received, some felt the policy should only refer to Building Regulations, some wanted more ambitious targets, and enforcement action taken where not met. The need to consider coal mining legacy and land instability was mentioned.	Having reviewed the evidence it is considered that the policy should be deleted and new policies introduced instead to reflect updated evidence and the Council's ambitions.	As per the officer comment
Q95: Do you have any comments on our proposals for setting more ambitious standards for new build developments with the introduction of specific targets that go beyond existing Building Regulations as described	Context: This question was aimed at establishing any local evidence and justification for going beyond Building Regulations. Responses (23). No specific evidence was received. Comments were more general, stating that evidence would be needed, that this should include viability evidence, that there should be a whole-life carbon emissions assessment approach and carbon offsetting.	See comment above	See above

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

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

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

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q103: Do you agree with our view that Policy EM10 remains up to date?	Context: this policy cites a balanced approach to protecting minerals against the need to attract investment and regeneration in a mainly built up area. Responses: None received	No comments received. No change proposed.	No change
Chapter 13 Connectivity			
Review of Policy C1: Bro	adband and Mobile Internet		
Q104: Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?	Context: It was proposed that the policy remained relevant but duplicated national policy so potentially could be deleted and views were sought on this. Responses: one comment was received making general observations about difficulty being able to deliver on unadopted roads.	The comments are noted, these relate to technical matters of delivery rather than policy so this is an issue for the providers. Consideration will be given to whether the policy should be retained as it duplicates national policy.	Delete policy
Review of Policy C2: Tel	ecommunications		1
Q105: Do you have any comments on our assessment of Policy C2 Telecommunications?	Context: It was proposed that the policy remained relevant but duplicated national policy so potentially could be deleted and views were sought on this. Responses: None	No responses. Propose policy is deleted as this duplicates national policy.	Delete policy
Review of Policy IM1: De	veloper Contributions for Infrastructure		
Q106: Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any	Context: The consultation suggested that the policy on contributions for infrastructure was still relevant but should have a minor change to reference 'developer contributions' rather than CIL	Comments noted, and the term 'developer contributions' is used as this relates to a range of potential funding sources such as Section 106 or any future	Minor update to refer to 'developer contributions'.

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

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

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

Appendix 1 - Comments Form

Coventry City Council Local Plan Review

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

Comments form

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

Please note, submitted information including your name and your comments will be publicly available. Other personal details e.g. private address and email will be kept

confidential. For further information please read our privacy statement

https://www.coventry.gov.uk/planning-policy/planning-policy-privacy-notice (printed
copies will be made available alongside this form)
Name:
A 1.1
Address:
Representing (If Applicable):

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Regulation 18 – Consultation Statement		
Email (Optional):		
Would you like us to add your email to our consultation database, s	o you a	are aware
of updates and other planning consultations. (Please tick yes if you	conse	nt to us
adding your details).	Yes	
Which document are you commenting on (please tick).		
Issues and Options Consultation document		
Sustainability Appraisal		
Equality & Health Impact Assessment		

Appendix 2 – Press release Media release

Tuesday 18 July 2023

Now is the right time review Coventry Local Plan

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

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

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

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

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

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

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

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

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

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

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

"Local people need to have every opportunity to give their comments."

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

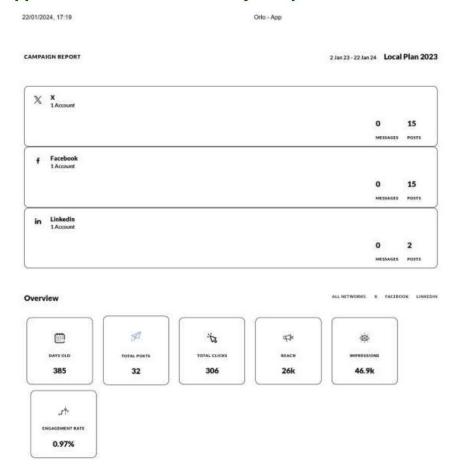
Cabinet members gave their support to start the 'regulation 18' consultation phase, known as 'issues and options', at last week.

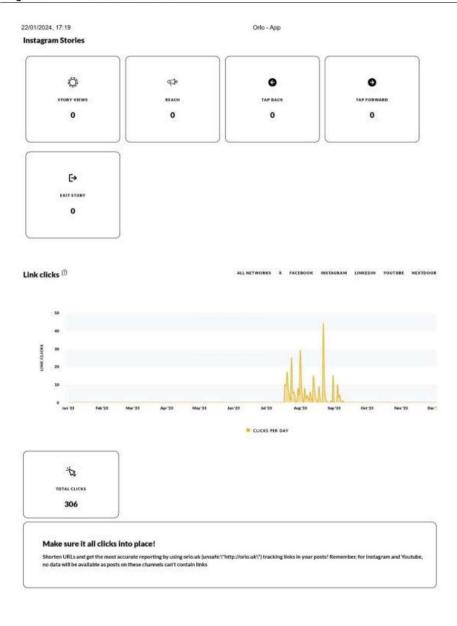
The key issues being considered through the review of the plan are:

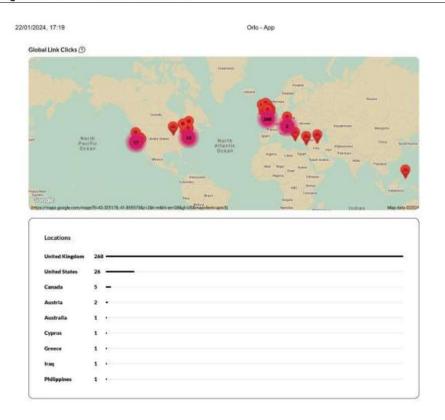
- That policies reflect the most up to date national statistics;
- The review and re-establishment of local housing need and supply;
- That reviewed policies-reflect the priorities of the One Coventry Plan 2022 2030:
- That reviewed policies reflect the priorities of the Climate Change strategy (noting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

Have your say at www.coventry.gov.uk/localplanreview **Ends**

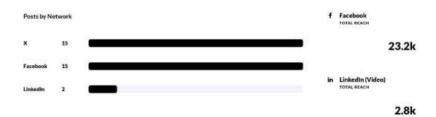
Appendix 3 – Social media analytic report

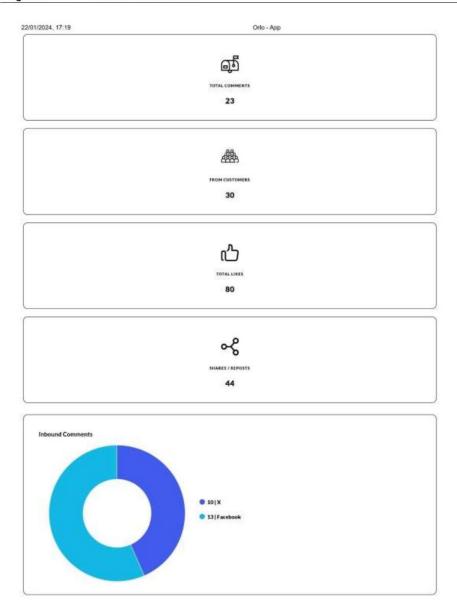






Posts breakdown







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

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



If you need this information in another format or language please contact us Telephone: (024) 7683 1109 e-mail: planningpolicy@coventry.gov.uk

Review of Coventry's housing blueprint enters final stage











A REVIEW of Coventry's Local Plan, which has been underway since December 2022, is nearing completion.

As part of the final stage, a six-week publication period - the last stage for public feedback - got underway this week, before elected members consider the submission of the Local Plan for examination.

The proposed updated plan includes steps to increase the proportion of social housing built on all qualifying sites while seeking to increase the delivery of affordable homes.

Local Plans should be considered for review at least once every five years.

A spokesperson for Coventry City Council (CCC) said it hoped key targets in its updated plan would help the city to meet the development needs of its communities in 'a balanced and sustainable way'.

The plan includes development targets for the 2021-2041 plan period for new dwellings and the provision of employment land.

The proposed development targets are informed by the 2022 Coventry and Warwickshire HEDNA (Housing and Economic Development Needs Assessment).

The council said its approach was 'brownfield first', and to protect the city's remaining areas of green belt.

Coun Naeem Akhtar, CCC's spokesperson for Housing and Communities, said: "This is an important stage for our Local Plan. There is a housing need in the city, and we are determined that quality is maintained and that there are opportunities for more first-time buyers to get on the housing ladder.

"More social housing development is also a key part of the plan and this includes all kinds of developments including those on smaller plots like garage sites, which turn derelict land into family homes."

The council spokesperson added that Coventry had a tightly drawn administrative boundary which meant development land was 'always in short supply'.

They added: "Through the allocation of brownfield development sites and making best use of land, the council considers that it is able to identify land to meet its local housing need figure.

"The council recognises the need to support the local economy and enable job creation, and continues to work with its partners in neighbouring councils to consider all options for meeting this need in the absence of suitable available employment sites within the city.

"The policies also aim to promote higher thermal efficiency standards of new build development in response to climate change and cost of living pressures.

"Policies are included for the setting of expectations for developers to provide onsite renewable energy generation and restrictions upon the use of fossil fuels."

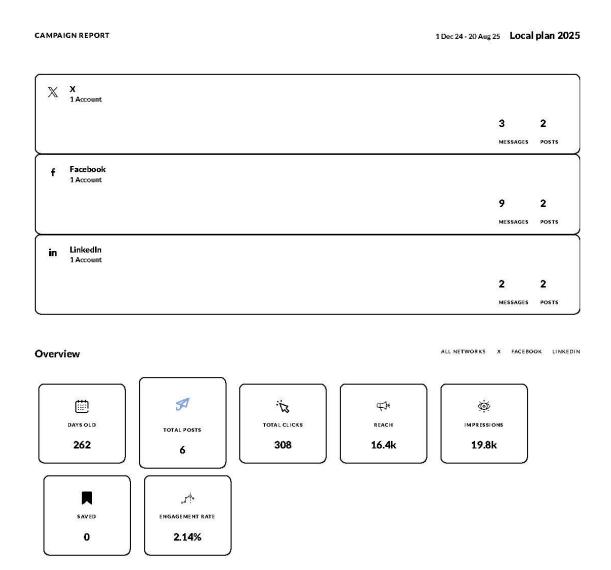
The six-week publication period ends on Monday March 3. Visit www.coventry.gov.uk/localplanreview for more information.

Coventry Observer Comment Policy

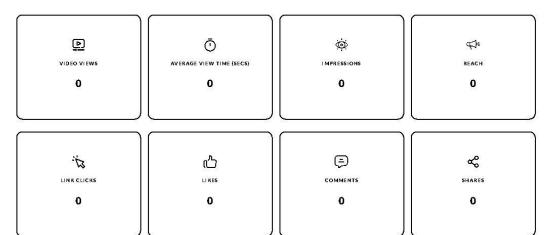
We welcome respectful and on-topic comments. Rude or off-topic comments may be removed. Be kind.

Got it

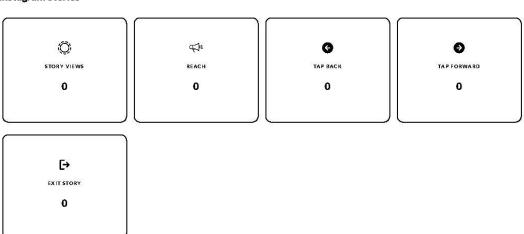
Appendix 3 Social media statistics



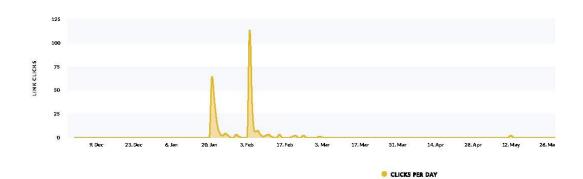
Video Metrics



Instagram Stories



Link clicks (2) ALL NETWORKS X FACEBOOK INSTAGRAM LINKEDIN LINKEDIN PERSONAL YOUTUBE NEXTDOOR US TIKTOR





Make sure it all clicks into place!

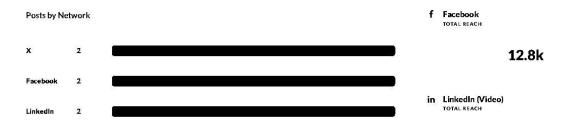
Shorten URLs and get the most accurate reporting by using orlo.uk (unsafe:\"http://orlo.uk\") tracking links in your posts! Remember, for Instagram and Youtube, no data will be available as posts on these channels can't contain links

Global Link Clicks 🗇

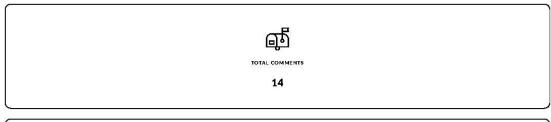


Locations		
United Kingdom	96 ————	
Ireland	•	
Singapore	•	
Tunisia	•	
United States	•	
Austria	F	
Brazil	F	
Spain	F	
Sweden	•	

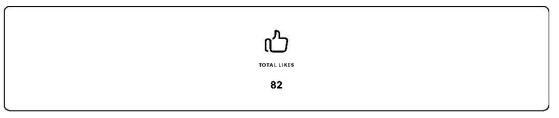
Posts breakdown

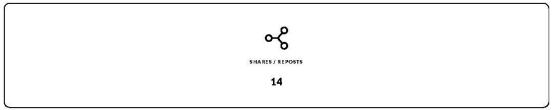


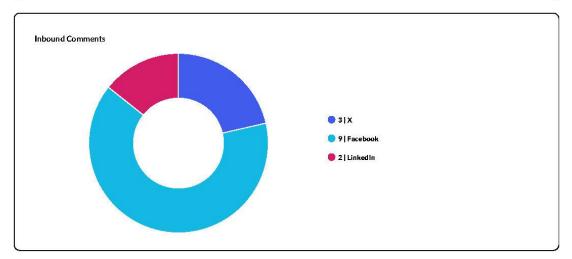
3.6k





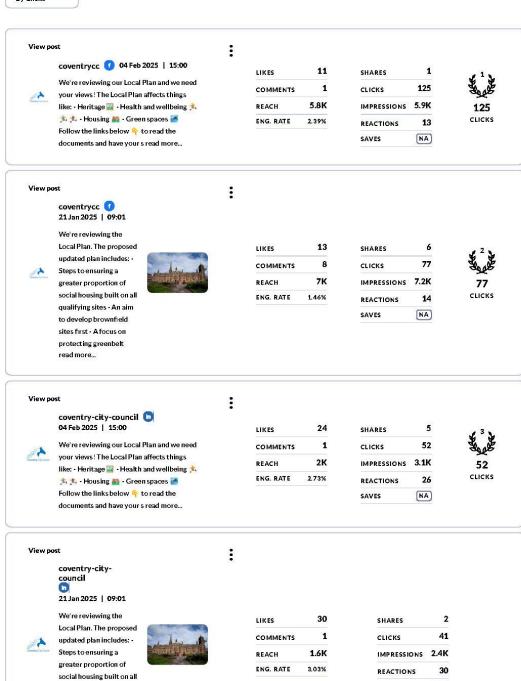






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By Clicks



qualifying sites - An aim to develop brownfield sites first - A focus on protecting greenbelt read more... NA

SAVES

