

Coventry Local Plan Review: Issues and Options Consultation July – September 2023

The Response of the Coventry Society



The Views of The Coventry Society

The Coventry Society – the city's civic society - recognises the importance of the Local Plan. For over fifty years we have campaigned for a quality environment, better amenities, recognition of the importance of our heritage, and support for the diversity and distinctiveness of the City.

We recognise that the policies and proposals of the Local Plan will set the pattern for the development of the city for the next two decades. So, the content of the reviewed Plan is important to us and the city.

The Coventry Society has participated in the consultation on the Issues and Options Report through eliciting the views of our members, attendance at some of the drop-in consultations at local libraries, assisting Coventry NW Member of Parliament Taiwo Owetami at one of her drop-in sessions, and partnering with the Coventry Green New Deal team to organise an evening community engagement event. The latter two events have enabled us to understand the often strongly-held views of local residents and helped in formulating the detailed views now attached.

In summary, within the Issue and Options consultation documents we welcome and support several of the proposals including:

- Protection of the green belt and local green spaces, but we would like to see much more emphasis on improving these areas.
- Rejection of the government's policy of boosting housebuilding by an extra 35% over and above agreed local needs
- Focus on affordable housing provision especially social rent (which is approximately 50% of market rent) as well as alternative forms of provision e.g. co-living, and self-build & custom build housing.
- Transport strategy with its emphasis on public transport improvements (but this depends on the actions of other organisations such as the West Midlands Combined Authority).

There are a number of issues where we believe there should be much stronger emphasis:

- Tackling climate change e.g., improving green and blue infrastructure. We would like to see the Council develop a specific strategy for the Rivers Sherbourne and Sowe that permits sympathetic development that provides for better public access to these waterways.

- We would like to see the council make a firm commitment to community engagement and liveable neighbourhoods in both existing and new housing areas. A liveable neighbourhood would have open space, local facilities and services, better built environment, and more green spaces, all within walking distance.
- Conserving and improving our heritage e.g. our city centre and the post-war housing estates.
- Design policies that reflect the distinctiveness and uniqueness of the built environment of our city.

Finally, there are two issues where we believe a new direction is required:

- New student housing: We believe that there should be a moratorium on new schemes until there is an agreement over future requirements. Evidence that we have seen suggests that there is an excess of student housing in the city and city council failure in other housing areas suggests that there should be a re-focus of housing priorities.
- We think that the council should develop policy and an investment strategy that is targeted at the north of the city and on former-council estates. We feel that, unwittingly, there is too much emphasis on the more affluent parts of the city.

We hope that the above key points and attached detailed comments will be seriously considered in the coming weeks as the draft Local Plan Review is formulated. We are willing to engage in further discussions to explain or expand on the issues that concern us and, with the Coventry Green New Deal, will be prepared to facilitate further community engagement events at the time of the formal consultation on the draft Local Plan.

John Payne

Secretary of the Coventry Society

21 September 2023

Question No	Question	Response
Chapter 2: Health and Wellbeing		
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?	It needs to be made clear that policy HW1 and a full HIA etc applies to redevelopment / regeneration projects as well as new developments.
Q2	Do you have any comments on the proposed checklist and its content?	No.
Q3	<p>Given the significant implications development proposals can have on people’s physical and mental health, what do you think the proportional threshold for housing developments requiring a full HIA should be:</p> <ol style="list-style-type: none"> 1. Unchanged – 150 dwellings or more – please explain why 2. 100 dwellings or more – please explain why 3. 50 dwellings or more – please explain why 4. Other – please explain why 	See our response to Q1
Q4	<p>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?</p> <ol style="list-style-type: none"> 1. At Outline stage only – please explain 2. At Outline and reserved matters stage – please explain 	2: Frequently, for example, scale and nature of developments are only confirmed at the reserved matters stage – so HIA at outline application stage can only deal with principles.

Question No	Question	Response
Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate		
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?	<p>We support this approach.</p> <p>The government has produced no evidence to back up its 35% uplift figure.</p>
Q6	Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider?	<p>We believe there should be a much stronger strategy to improve living conditions, services, neighbourhoods in the north of the city and on large peripheral housing estates.</p> <p>Much of the public and private investment in recent years and forthcoming decades is targeted at the south of the city and the city centre. The Council has not brought forward any evidence to show that there is a beneficial trickle-down effect for neighbourhoods in the north of the city or for large peripheral estates.</p>
Q7	Do you have any comments on the overall Employment Land Needs for Coventry?	We have concerns that the city's need for B8 employment land is yet to be identified. When the current study is completed then this needs to be publicised and a further consultation undertaken: the scale and location of such land in Coventry may well be a contentious issue.
Q8	Do you have any comments on our proposed amendments to Policy DS2?	Coventry does not stand alone as a city but is part of a sub-region of inter-connected settlements. If planning is to mean anything it requires collaboration between the local authorities in the sub-region.
Q9	Do you have any comments on our proposals to update Policy DS3?	We support this change.
Q10	Do you have any comments on our proposed updates to Part A of policy DS4?	We support the strengthening of design policy in relation to master planning.

Question No	Question	Response
Q11	Do you agree that we should make a minor change B, C and D in terms of changing the references to use classes to reflect new legislation?	Yes we agree with these changes.
Chapter 4: Jobs and Economy		
<p>In general, we support the Council's policies for jobs and economy and the changes proposed. However, as per our response to Q7we note that the city's need for B8 employment land is to be identified in a current, as yet unpublished. study. The scale and location of such land in Coventry could be contentious. A further consultation is needed when the study is completed.</p> <p>In a similar vein, there are references to 'town centre locations' in respect of Q20 and 'town centre uses' in respect of Q24, yet the locations of these 'town centres' are nowhere specified, and are to be on 'the Policies map' (presumably at the draft Plan stage). Clarification of the locations of these 'town centres' is needed now in order to understand the scope of the policies.</p>		
Q12	Do you have any comments on our proposals to introduce a new policy which defines our definition of 'employment' for planning policy purposes?	
Q13	Do you have any comments on our proposals that Policy JE1 could be strengthened in line with our proposals?	
Q14	Do you have any comments, or local evidence which might be helpful in assisting us develop standards for new employment sites?	
Q15	In relation to Policy JE2, Do you have any comments on the supply of employment land?	

Question No	Question	Response
Q16	<p>We are always keen to understand the employment land needs from local businesses and residents. Therefore, do you have:</p> <ol style="list-style-type: none"> 1. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1 (in the online version this can also be found in the 'response templates' section). 2. A site you would like us to investigate? Please provide as much detail as you can 3. Another suggestion or comment – please provide detail 	
Q17	Do you have any comments on our proposed changes to part 3 of Policy JE2?	Agree -replace with monitoring against overall requirements and performance of allocations.
Q18	Do you have any comments on our proposed changes to JE3 Part 1a?	
Q19	Do you have any other comments regarding policy JE3?	
Q20	Do you have any comments on our suggestions for proposed changes to Policy JE4?	Agree the minor changes. However, the 'town centre locations' are yet to be specified (to be on the Policies map) thus it's impossible to know the breadth of this policy.
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?	
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?	R&D and storage and distribution are different markets with clearly different requirements in terms of the scale of development (and thus location) required. Different policies should therefore apply.
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 any information and evidence which would help us understand and accommodate these?	

Question No	Question	Response
Q24	Do you have any comments on our suggestion that policy JE6 should treat tourism as a main town centre use?	The Visitor Economy is and has been for some years an important part of the city's economy. There is a danger that unless 'main town centres' include the CBS Arena and Warwick University then two foci of the leisure and conference visitor economies will be excluded. See Q20 answer.
Q25	Do you have any other comments or suggestions relating to tourism and Policy JE6, including evidence if this is applicable?	
Q26	Do you have any comments on our view that policy JE7 remains up to date?	

Chapter 5: Housing

We believe that appropriate housing policies are a fundamental part of local plans. Our key points are:

- 1 Development of new housing in the green belt and on green spaces should be prohibited
- 2 The focus on new housing development should be on brownfield sites and through 'gentle densification' of existing neighbourhoods where appropriate
- 3 We support the focus on affordable housing especially social rent
- 4 We welcome reference to build to rent and alternative forms of provision e.g. co-living, community-based housing, and self-build/custom-build – but these should be prioritised and actively encouraged
- 5 Good quality housing should be part of a liveable neighbourhoods approach. We would like to see the reviewed plan have a key focus on Liveable Neighbourhoods (see our response to question 30)
- 6 There should be a moratorium on new build student housing and priority instead given to the housing forms listed in 4 above.

Question No	Question	Response
Q27	<p>Do you have any suggestions to Policy H1 which can help us meet our housing need within our area?</p> <ol style="list-style-type: none"> 1. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1 (in the online version this can also be found in 'response templates') 2. An area you think could be densified which still achieving a high standard of living? Please provide as much detail as you can 3. 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 4. Another suggestion or comment – please provide detail 	<p>2 The city centre boundary should be extended beyond the ring road so that potential sites for high density, sustainable, and affordable housing are investigated.</p> <p>In addition, areas close to transport hubs should be investigated for high density, sustainable, and affordable housing. In the long term, this could, for example, the proposed Binley rail station, as well as the Coventry VLR (very light rail).</p> <p>By high density, we mean the principles of 'gentle densification' and we believe that this should be emphasised throughout the document.</p> <p>4 There appears to be no reference to a brownfield land register which the government highlighted to councils in 2017. We believe that the local plan should reference and keep up-to-date this register so as to highlight sites suitable for housing within the built-up area.</p>
Q28	<p>Do you have any comments on the review of Policy H2 (Housing Allocations)?</p>	<p>Ensuring development of already allocated sites should take precedence over allocating additional land for residential development</p> <p>Proposed existing sites that have no planning application should be re-appraised, and where appropriate the Council should use its enabling skills to facilitate development</p> <p>Similarly, the Council should use its enabling skills where proposed sites have stalled</p>

Question No	Question	Response
Q29	Do you have any comments, including supporting evidence which can help us address Policy H3 on introducing standards which can help us proactively address climate change in terms of residential development?	<p>Council should work towards a net zero target for all new homes and neighbourhoods (including redevelopment projects) no later than 2030 and should positively encourage innovative schemes e.g. passivehaus standards. This should include other aspects of climate change adaptation such as water use and re-use (see Q97 & Q98)</p> <p>Useful sources include: Good Homes Alliance: Home – Good Homes Alliance Passivehaus Trust: Home (passivhaustrust.org.uk)</p> <p>[Links with chapter 12 Qs 92-95]</p>

Question No	Question	Response
Q30	In relation to Policy H3 do you have any comments on our proposals for introducing new policy on amenity?	<p>Policy should emphasise ‘sustainable neighbourhood standards’ rather than amenity and be applied to large-scale new residential schemes, redevelopment projects, and small schemes which impact on existing neighbourhoods.</p> <p>Sustainable neighbourhood standard should include:</p> <ul style="list-style-type: none"> - Reference to 15 / 20 minute-neighbourhoods - Access to key services and amenities close to home by walking and cycling e.g. healthcare, childcare, schools, public transport, food shopping, open space / green space, public toilets, community centres, libraries etc - Reference to Sport England’s ‘active design guidance’ <p>We note that there is reference to liveable neighbourhoods in appendix three of the options document, but this is not included in the proposed plan review. We believe that liveable neighbourhood policies should be incorporated into policies throughout the plan.</p> <p>See also our responses to Qs 68-70</p> <p>A significant part of Coventry consists of terraced housing built prior to 1950. We would like to see more emphasis on improving the quality of the housing and streetscape in such areas. Among many problems, the housing suffers from poor heat insulation, access to "nature" is poor and the streetscape has a poor pedestrian environment. Lessons learnt trying to improve one locality could be copied to the others.</p>

Question No	Question	Response
Q31	In relation to Policy H3 do you think we should require development to demonstrate how it has taken the Building for Healthy Life Principles into account?	<p>Yes – reference should also be made to the Town & Country Planning Association’s work on planning and health at <u>Healthy Place-making (tcpa.org.uk)</u> which includes guidance on ‘healthy local plans and policies.</p> <p><i>[Links to chapter 2 on health and well-being: Qs 1-4]</i></p>
Q32	In relation to Policy H3 do you have any comments on our proposals to adopt the National Described Space standards?	These optional standards should be adopted
Q33	In relation to Policy H3 do you have any comments on our proposals to introduce specific policy which supports Build to Rent in Coventry?	<p>Build to rent (funded by institutional investors and professionally managed) should be supported so as to provide high quality privately rented accommodation for primarily younger graduate households</p> <p>Locations should be identified e.g. city centre and transport hubs (and see our response to Q27)</p>
Qs 34, 35, 36, 38 & 39	Co-living, self and custom-build housing, and community-led housing	<p>We strongly welcome the specific focus on alternative forms of provision either through new development or renewal projects.</p> <p>We recommend an additional overall policy highlighting that in principle active support will be given to these and other similar types of provision e.g., urban community land trusts, development trusts, cohousing communities, community-based housing associations etc</p> <p>See <u>https://www.communityledhomes.org.uk/what-community-led-housing</u></p>

Question No	Question	Response
Q34	In relation to Policy H3 do you have any comments on our suggestion to introduce specific policy which supports Co-Living in Coventry?	<p>We support the introduction of a specific policy. However, further works is required. Co-living is usually defined as ‘purpose-built and managed residential developments for rent, which include a combination of personal and shared amenity space, and often but not always located in city and town centres’. There are thus overlaps with build to rent and student housing.</p> <p>In addition, there is a growing interest in the UK for co-living schemes for specific groups such as older households, LGBT+, etc. The Council should include reference to these groups. We note that co-living is often confused with cohousing, which is well established in the UK – though not as much as it is in many other countries. Cohousing tends to be more bottom-up and can include socially rented homes and long leaseholdings. See https://cohousing.org.uk/.</p>
Q35	In relation to Policy H3 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 should, what should the limit be, and what evidence could we use to provide robust and fair justification?	See response to Q34
Q36	In relation to Policy H3 do you have any comments on our proposal to introduce a policy on Custom and Self Build Housing?	It is disappointing that there has not been a proactive approach adopted following legislation in 2015. We, therefore, welcome the introduction of this policy.
Q37	We propose to delete the part of Policy H3 which supports limited infill in the Green Belt as this is contrary to national Green Belt policy. Do you have any comments on this?	We welcome this policy, but it needs to be linked also to GB 1 and 2

Question No	Question	Response
Q38	In relation to Policy H3 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?	Yes – evidence from elsewhere in England (e.g. Cherwell DC) and Almere in the Netherlands suggests that self and custom-build housing becomes a significant and effective form of housing where a significant site is designated for this type of provision supported by a local authority using its enabling skills. But selection of a site or sites needs to be done in consultation with relevant interested parties.
Q39	In relation to Policy H3 do you have any comments on the inclusion of support for Community-Led Housing in this proposed new policy?	We welcome the introduction of this policy to encourage community-led housing provision either through new-build or regeneration. See https://www.communityledhomes.org.uk/what-community-led-housing for further information on this topic.
Q40	Do you have any comments on our proposed minor revisions to Policy H4 (securing a mix of housing)?	Minor revisions to the mix of housing should reference co-housing, self and custom-build housing, and community-led housing
Q41	Do you have any comments on the review of Policy H5 Managing Existing Housing Stock?	We support the reference to energy efficiency but suggest it is widened to net zero (see our response to Q29) and ‘sustainable neighbourhoods’ contribution (see our response to Qs 30 & 31)
Q42	<p>In relation to Policy H6 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</p> <ol style="list-style-type: none"> 1. Yes – please comment further if you wish 2. No – please explain 	1 Yes: social rent is usually approximately 50% of market rents and therefore are preferably to affordable rents at up to 80% of market rents – social rents, therefore, are more likely to meet the needs of those on low incomes.
Q43	In relation to Policy H6 do you have any comments on our proposals regarding affordable home ownership? What evidence do you think we should use?	<p>We support the principle that affordable home ownership should be available to households who are unable to meet their housing needs through the open market.</p> <p>The policy should be based on a threshold level for purchase on the open market and this should be re-assessed annually to reflect changes in house prices and income patterns</p>

Question No	Question	Response
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?	As affordable housing (social rent, affordable rent, and affordable home ownership) is partly funded through cross-subsidy from market housing (sale and rent), priority should be given to this type of housing over other requirements during negotiations with developers e.g. infrastructure
Q45	Do you have any comments on our review of Policy H7, Gypsy and Traveller Accommodation?	We disagree with the comment on transit arrangements is an out-of-scope issue for a local plan. Tackling unauthorised encampments (which is an issue in Coventry at certain times of the year) is best tackled through sites for temporary pitches.
Q46	In regard to policy H8 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.	<p>New housing built to M4(2) and M4(3) standards is an increasing necessity and is part of a sensible strategy of ‘future proofing’ homes.</p> <p>The analysis needs to cover both older households and younger households with disabilities. In addition, population and household forecasts highlight the substantial rise in older people over 85 years of age by 2041. It is not clear whether the HEDNA report takes account of these points</p>
Q47	Do you have any other comments on our review of Policy H8?	If a policy of sustainable neighbourhoods is adopted (see our response to Qs 30 & 31), more but not all locations would be suitable
Q48	<p>In relation to Policy H9 do you consider:</p> <ol style="list-style-type: none"> 1. The policy is up to date and sets sufficient standards to maximise capacity already 2. The policy could be amended to increase minimum density levels in certain locations outside the ring road? (please explain and provide evidence where applicable) 	2 See our response to Qs 27 & 33

Question No	Question	Response
Qs 49 – 52	Student Housing	<p>This is a major issue. We are concerned about the number and scale of new purpose-built developments in city centre, and inner city areas as well as at Westwood Business Park and Burnsall Road.</p> <p>We are also alarmed by the growth of HMOs targeted at the student market.</p> <p>In both cases, they have impacted negatively on local communities – loss of local amenities and services, worsening of the local neighbourhood environment and disrupted local cohesion.</p> <p>It is particularly disappointing that both universities do not appear to have published forecasts on future student housing requirements</p>
Q49	Do you have any comments on our review of Policy H10?	<p>We disagree with the monitor and manage principles. Instead, we would urge a moratorium on further new build student schemes until there is a consensus and clarity on future student housing requirements in Coventry up to 2041. A detailed note for the Higher Education Policy Institute (August 2023) on student accommodation highlights that ‘in Coventry there will be an extra 1,136 beds in 2023/24 in a market that already has a surplus estimated at 6,000’ (see Accommodation shortages: are the odds stacked against students? - HEPI)</p> <p>Such a moratorium would have the benefit of encouraging build to rent schemes and alternative forms of provision on sites and in areas that have become popular with developers of student housing. It will also support policy H4 of achieving a better mix of housing.</p>

Question No	Question	Response
Q50	In relation to Policy H10 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?	See Q49 response
Q51	In relation to Policy H10 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 backgrounds including the potential need for developer contributions to secure affordable tenures?	No comment
Q52	In relation to Policy H10 do you have any other issues you think we should be taking into account when planning for student housing?	No additional comments
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?	We support this approach

Question No	Question	Response
Chapter 6: Retail and Centres		
<p>Policy R2 – Retailing in the City Centre</p> <p>The ambitious policy of maintaining Coventry City Centre as a significant sub regional centre are not matched by reality or proposed action. The retail offering of the city centre is already less than Leamington and even Kenilworth. The main cause of this decline appears to us to be the over-reliance on partnerships with major developers and national chain stores. Developer led retailing inevitably focuses on national chain retailers, which seek high profits and are therefore less resilient to change in the retail market.</p> <p>What is also needed is an approach to support small independent retailers to relocate to and remain in the city centre. There needs to be a growth pathway that would support small retailers to grow and develop and provide an alternative attraction to the city centre. We need a more organic and supported approach that includes rate and rent support, training and promotion. As part of this approach, we would like to see a commitment to refurbishment and re-modelling of the Coventry Retail Market.</p> <p>Charity shops are ignored in the planning framework, but are an increasingly important part of the retail offering and should be acknowledged as such. Charity shops not only provide commodities for people of limited means, but are also an important part of the recycling and re-use approach which is important to achieving net zero.</p>		
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?	This seems to be a sensible change in wording
QQ55	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?	We do not object to this approach, however where entirely new centres are proposed (Eastern Green and Keresley) it will be necessary to safeguard land sufficient for the amount of retail space anticipated.
Q56	Do you think the centres listed in Policy R1 remain fit for purpose and should be retained as allocations within this policy?	We have no views on this matter.
Q57	Do you have any comments on a potential change to policy wording to Policy R1 to include tourism in relation to the Arena Park Major District Centre?	This seems to be a sensible amendment.
Q58	Do you have any comments on the insertion of a reference to limit the disproportionate concentration of sui-generis uses within frontages to Policy R2?	<p>We support the inclusion of policy wording aimed at reducing the concentration of sui generis uses in street frontages such as Burges (not the Burgess).</p> <p>We concur that the City Centre Area Action Plan should be integrated into the main Local Plan documents.</p> <p><i>We have further comments about policy shown separately above</i></p>

Question No	Question	Response
Q59	Do you have any comments on the proposed changes to the above paragraph of Policy R3?	We have no comment on this change of policy.
Q60	With the above in mind, do you have any comments on whether the centres listed in Policy R3 remain fit for purpose, or should changes to the hierarchy and/or defined centres be made?	We have no comment on this matter.
Q61	Do you have any comments on whether part one of Policy R4 should include reference to hot food takeaways?	We agree that Policy R4 should include reference to hot food takeaways.
Q62	Do you have any comments on Policy R4, regarding the creation of primary shopping areas in the City Centre, Major District and District Centres?	We have not comment on this change in policy.
Q63	Do you agree with our suggestion in Policy R4, 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?	We have not comment on this change in policy.
Q64	Do you agree with our suggestion that this policy (Policy R5: Retail Frontages and Ground Floor Units in defined centres) should be deleted?	We have not comment on this change in policy.
Q65	Do you agree with our proposals in Policy R6 for the deletion of 'normally' and to add in 'adopted' where suggested?	We have not comment on this change in policy.
Q66	Do you have any comments on our suggestion that Policy R6 should reference the 5 minute walk school exclusion zone?	We agree with this policy.
Q67	Do you have any comments on our proposal for a new policy regarding local services and parades? Have you any examples of a policy which protects local shopping parades?	We feel that local parades are very important and should be protected by policy.

Question No	Question	Response
Chapter 7: Communities		
<p>We believe that the principle of liveable neighbourhoods should form a core element of the local plan review. Each chapter in the issues and options consultation paper should consider this principle. Underpinning this principle is community engagement – working with local communities to develop ideas on liveable neighbourhoods.</p> <p>We welcome the tentative steps being taken by the Council on aspects of liveable neighbourhoods in Earlsdon (and the brief mention in appendix three), as well as on community engagement on the draft climate strategy. But the Council must be much bolder in facilitating liveable neighbourhoods and community engagement. A good starting point is the local plan review.</p> <p>Our joint workshop with Coventry Green New Deal on 5 September attracted over 50 participants, and there was a strong consensus in taking forward both community engagement and liveable neighbourhoods in the local plan review. Participants highlighted their importance in the development of new housing areas, the revitalization of existing neighbourhoods (including local shopping centres) and the regeneration of social housing estates.</p> <p>There is a substantial amount of guidance on liveable neighbourhoods. The Town and Country Planning Association, for example, has substantial resources including ‘neighbourhood planning and a 20-minute neighbourhood toolkit – see Neighbourhood planning and 20-minute neighbourhood toolkit - Town and Country Planning Association (tcpa.org.uk). Similarly, a number of councils have taken forward liveable neighbourhoods as a corporate commitment e.g. Bristol City Council (see Liveable neighbourhoods (bristol.gov.uk)) and Islington Council (see Liveable neighbourhoods Islington Council).</p>		
Qs 68 – 70	Communities	Our response to Q30 on sustainable neighbourhood standards applies to Qs 68-70
Q68	Do you have any comments on our review of Policy CO1?	See above
Q69	Do you have any comments on our suggestions for amending Policy CO2	We welcome a wider interpretation of ‘community premises’ re re-use / redevelopment of premises

Question No	Question	Response
Q70	Do you have any comments on our view that Policy CO3 needs a minor update as described?	We believe that the Council should adopt a proactive approach in encouraging and supporting neighbourhood planning especially in inner areas and on peripheral estates. This should be reflected in a revised policy.

Chapter 8: Green Belt and Green Environment

In general, we support the proposed changes, as set out below. Green Belt and local green spaces should be protected from development. However, we have four concerns:

- I) in relation to safeguarded land within the green belt the Issues and Options paper is dodging the important issues of the level of protection, or otherwise, given to such land. The sites at issue are to be addressed following 'the Issues and Options consultation and in line with cross boundary discussions'. Thus, there is no opportunity for proper consideration of these contentious sites in the current public consultation. We believe that since such safeguarded land sites are (in line with NPPF) to be developed beyond the Plan period then there should be explicit reference that these sites will be considered post 2041. See Q73.
- II) Policies should go beyond preserving the Green Belt and Local Green Space. There should be proactive policies to positively manage these areas for community benefit. There is no reference to the City Council's Greenspace Strategy (2020) in relation to the policy on Local Green Spaces.
- III) There is nowhere in the Issues and Options consultation any reference to the importance of 'bluespace' in the city, save for references to the Coventry Canal. The city is not possessed of many significant water bodies, and thus those that we have deserve protection, both for amenity, nature conservation, and increasingly, for the avoidance of flooding. We would suggest the consideration of a policy to protect the Rivers Sherbourne and Sowe and the city's many brookstrays. Wording could be 'To protect the route of the rivers Sherbourne and Sowe and the city's brookstrays throughout Coventry through refusing further development above such water bodies where they are underground; and at the surface, to protect their banksides from development and where possible facilitate nature conservation and public access and enjoyment.

There is no reference in the 'draft policies' or the Infrastructure Delivery Plan to the City Councils ambitious policy of planting a tree for every citizen by 2030. The Council's Urban Forestry Strategy (2022) deserves reference for the role it may play in facilitating the protection of urban greenspace, greening the city centre, and as a positive action against climate change.

Q71	Do you have any comments regarding Policy GB1?	<p>We support the policy of protecting the green belt</p> <p>Please also refer to our response to Q 37</p>
Q72	Do you think that Green Belt and Local Green Space should be covered in two separate policies?	<p>Yes</p> <p>Local green space (especially brookstrays) should have the same status of protection as green belt. There should also be positive strategic policies and encouragement to improve local green space. The Sherbourne Valley rewilding project is an example of this type of activity but should be part of a strategic approach</p>

Q73	Do you have any comments of the review of Policy GB2?	Safeguarded land within the green belt is defined in the NPPF as sites that may be developed beyond the plan period. It therefore needs to be made clear that these sites will be considered post-2041.
Q74	Do you have any comments on our review of Policy GE1: Green Infrastructure?	<p>We support the proposed changes to GE1</p> <p>We, however, would like to see reference to blue infrastructure (rivers, streams, ponds). Existing blue infrastructure should be conserved and enhanced, and new developments should incorporate new blue infrastructure.</p> <p>This reference could be incorporated into GE1 – GE3. But we would prefer a new policy</p>
Q75	Do you have any comments on our proposals to retain the above policy with no changes?	We agree the proposed changes
Q76	Do you have any comments on our suggested policy approach to strengthening and updating Policy GE3?	We strongly support these changes
Q77	Do you have any comments on our review of Policy GE4 Tree protection?	We strongly support these changes
Chapter 9: Design		
Q78	Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)?	<p>We broadly support the proposed strengthening of the policy to recognise the changes needed as a result of the pandemic and the challenge of climate change. We welcome the inclusion of embedding economic and social sustainability in design together with wellbeing and local identity.</p> <p>We would like to have seen a more inclusive placemaking approach that would have a strong “Coventry specific” orientation. We would like to see recognition of the need for neurodiversity awareness in design. We hope that the “Localised Coventry design code SPD” will be produced as a matter of urgency.</p>

Chapter 10: Heritage

Preamble: Coventry’s heritage in buildings is one area where significant progress has been made in recent years and that momentum must not be lost. We are concerned, therefore, that the One Coventry Plan only references heritage in terms of the city’s economic prosperity and growth. Heritage is more than just a useful marketing tool; it ought to be a huge driver in engaging the population and improving civic pride, a state of mind that is still all too rare in Coventry.

The City Council is to be applauded for its pioneering partnership with the historic Coventry Trust in breathing new life into many of its neglected pre-twentieth century heritage assets.

However, it is still paying too little regard to its post-war building stock, as much a part of its heritage as its fourteenth century guild hall. Increasingly, Coventry is being seen nationally as an important repository of what is now widely known as ‘Festival of Britain’ architecture. Yet, too often, the city council’s first impulse is still to reach for the demolition ball. We would like to see more careful appraisal of this element of the city’s heritage and a real commitment to enhance and preserve, rather than destroy.

In that context, we would hope that the council and its developer partners for City Centre South would work together to restore and enhance the city’s pioneering market building, which while not part of the development scheme is an important contextual element of it.

We agree that it is important for the Local Plan to align its heritage policies with nature-based and resilient pathways within the draft climate change strategy. Climate change will shape all policy-making in the future.

Q79	Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)?	We agree
Q80	Do you have any comments on our review of Policy HE2, Conservation and Heritage Assets?	<p>We agree that Earlsdon and Brownhill should be added to the list of conservation areas (Policy HE1, point 1).</p> <p>We agree that all existing conservation areas should be kept under permanent review.</p> <p>We are concerned, however, that the nature and implications of conservation areas are not prominent in public discourse in Coventry. There is concern, notably in Earlsdon, that local residents do not know what becoming a conservation area means for them. We think the Local Plan needs to build in new ways to engage and inform the public about something that could affect everybody living in a defined area of the city.</p>
Q81	Do you have any comments on the review of Policy HE3 (Heritage Park – Charterhouse)?	We have no comments on this, aside from welcoming the council’s continuing support for the Heritage Park.

Q82	Do you have any comments on whether a separate archaeological policy would be beneficial (Policy HE4)?	<p>We believe that a separate archaeological policy in the Local Plan would help to protect development sites where traces of archaeology are not immediately obvious or known about.</p> <p>We agree that determining the archaeological significance of a development site early in the process would allow the alert mechanism to be triggered earlier and avoid damage that might otherwise occur.</p> <p>A separate archaeological policy seems a sensible step to take.</p>
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Chapter 11: Accessibility

The Local Plan policies on Transport are heavily constrained by external policy structures, listed in Section 2 of the Transport Topic Paper. Policy documents such as the NPPF, WMPTA’s Transport Strategy and the Council’s own Transport Strategy set out the direction of policy, which the Local Plan must adhere to. We broadly agree with the direction of these policies – the reduction of car travel, the increase in cycling and walking, the development of public transport options, the development of low vehicle neighbourhoods and the de-carbonisation of transport. However, the implementation of some of these policy directions is to be set out in documents that have not yet been published or approved – the Rail Investment Strategy, the Future Public Transport Network Plan, the Local Cycling and Walking Infrastructure Plan (LCWIP), the Transport Design Guide and the Future Highway Network Plan. We are therefore not in a position to respond to transport policies in detail.

We would repeat here the importance of amending the Local Plan to develop and implement policy on the subject of “liveable neighbourhoods”. Such neighbourhoods are more accessible and don’t rely on residents owning and using cars.

Q83	Do you have any comments on the review of Policy AC1 (Accessible Transport Network)	We don’t disagree with the thrust of these changes. However, we do not support those aspects associated with the use of the city as a testbed for autonomous vehicle development or the use of fanciful options such as the use of drones to be included in policy AC1(d). We feel that the reviewed plan should focus on tried and tested modes of transport e.g., buses.
Q84	Do you have any comments on a mechanism to support the provision of Electric Vehicle Charging Points (EVCP)?	No, but we support the development of an EVCP infrastructure in the city.

Q85	Do you have any comments on whether parking standards should reflect the strategy to reduce overall levels of car travel and promote more sustainable alternatives?	<p>In theory we agree with this approach. But car ownership is not the problem. Rather it is car usage. We doubt that negative controls will have the required effect. We would support a more positive approach, including public transport subsidies, the provision of alternative infrastructure for walking, cycling and public transport. Active support for car clubs and other forms of vehicle sharing would also contribute to the reduction in the city's vehicle population.</p> <p>We would like to see a policy adopted to move the entry/egress of multi-story car parks closer to major roads. Most of the private car traffic in the city centre is to/from the car parks. Traffic around the hospital and both universities would reduce if the car parks were moved closer to the major roads (A46, A45, A4053).</p>
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?	<p>We recognise the challenge that this policy change raises. Parking control is a blunt instrument in seeking to control car usage. Experience shows that reducing the amount of off-street car parking in new developments leads to the increase in on-street parking, with impacts on the appearance of a neighbourhood, accessibility for emergency vehicles, blocking of pavements etc.</p>
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?	<p>Whilst we can see the attractiveness of this approach, the demands on S106 requirements of new developments are approaching breaking point and may not be deliverable.</p>
Q88	Do you agree that strengthening the wording to promote cycling and walking more is the right approach? Please provide comments	<p>Yes, we agree that the policy should be strengthened to promote walking and cycling. We particularly wish to see an expansion of the concept of Liveable Neighbourhoods (please see note below).</p> <p>However, we feel that the e-scooter experiment in the city centre demonstrates that e-scooters are not the future for Coventry. We are also concerned about the growth of illegal e-bikes, primarily by delivery people. We feel that the Council should lobby for these vehicles to be defined as mopeds and covered by the same requirements (registration, provisional licenses and insurance).</p>
Q89	Do you have any comments on the review of Policy AC5 (Bus and Rapid Transit)?	<p>We support the development of public transport infrastructure, including Very Light Rail.</p>

Q90	Do you have any comments on the review of Policy AC6 (Rail)?	We support the Council's ambitions for improving rail services. We think that a renaissance in rail is long overdue and improved connections to Warwickshire and the East Midlands, particularly Leicester, are essential for the future.
Q91	Do you have any comments on the review of Policy AC7 (Freight)?	We support the proposed policy changes relating to overnight parking and facilities at 24-hour operation centres and avoiding heavy goods vehicles using residential streets. However, we are not convinced about freight consolidation centres.
Chapter 12: Environmental Management, Minerals and Waste		
Text correction "Chapter 12 identifies the city area as an Air Quality Management Area (AQMA) and retains the focus on reducing air quality" should read "improving air quality".		
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 achieving net zero in all new build developments?	<p>We strongly support this suggested policy development and in particular that "... this policy should also proactively promote the benefits of urban living, including high density developments and co living proposals to help in grey water systems with high quality design and the use of advanced methods of construction (including modular build) encouraging more people to choose a lifestyle which helps to address the challenges of climate change."</p> <p>The policy should also take account of the huge amounts of energy embedded in existing buildings, which should make their re-use rather than demolition and replacement with equally energy-intensive new buildings, a preferred option.</p>
Q93	Do you have any comments on the above proposals?	We strongly support this policy development. We see it as key to achieving net zero emissions.
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?	We strongly support this approach.
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 above? Please provide detail including what such targets might be, and any evidence to show how these would be viable and deliverable.	We strongly support this approach and whilst we are not in a position to recommend specific targets at the present time, we would be happy to work with the Council and other partners to develop these.

Q96	Do you have any comments on our suggestions for updating Policy EM3?	We would support the modification of this policy to require, support and develop the use of renewable energy technologies.
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?	We broadly support the initiatives to reduce the risk of flooding. However, we would like to see the adoption of a simple policy of “no building in the flood plain” to make it clear that in mitigating the impact of climate change it is no longer acceptable to build on land that may be subject to flooding. In post-war years the city had a policy of protecting the brookstrays and would like to see this re-instated. The added benefit of this approach would be that it would facilitate biodiversity improvement.
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?	We support the use of SUDS and are happy with the update of the policy, provided that abandoning the production of a SPD is replaced by genuine effective and enforceable guidance on this matter.
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?	We have no comment on this change.
Q100	Do you agree with our suggestion that Policy EM7 needs updating as described above?	We have no comment on this change. However, we feel that there should be a review of the recently implemented schemes to reduce NO2 to see whether they have been successful in achieving the NO2 reductions planned.
Q101	Do you agree with our view that Policy EM8 remains up to date?	We feel that the policy needs to be reviewed to ensure that it is achieving its objectives. We supported the Council’s initiatives to reduce NO2 and avoid a charging zone that would have impacted on inequalities. However, we need to ensure that the alternatives have been successful in reducing NO2 emissions.
Q102	Do you agree with our view that Policy EM9 remains up to date?	We have no comments on this policy.
Q103	Do you agree with our view that Policy EM10 remains up to date?	We have no comments on this policy.
Chapter 13: Connectivity		
Q104	Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?	We have no comments on this.
Q105	Do you have any comments on our assessment of Policy C12 Telecommunications?	We have no comments on this.

Q106	Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any other comments on our review of this policy?	We have no comments on this.
Q107	Do you have any comments on the updated Infrastructure Delivery Plan at Appendix 3?	The Infrastructure Delivery Plan is a mixture of scheduled and unscheduled investment proposals, general intentions, vague ambitions and “off the top of the head” ideas for the future. There is no link back to the Local Plan policies and the document appears as a “stand alone” document with little link to the Local Plan. We would be happy to provide comments on the proposals, once they have been made specific and linked to the Local Plan policies.

Chapter 14: Coventry City Area Action 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.	<p>We feel that the City Centre Action Plan should be incorporated into the Local Plan and not stand as a separate document.</p> <p>We feel that the boundary of the city centre should be reconsidered, extending it beyond the Ring Road onto associated areas of higher density developments, including Coventry University (Gosford Street and Gulson Road) to the Coventry Canal, Parkside/ Technocentre, Friargate and the Railway Station, Central Six, The Butts/Queens Road (up to but excluding Coventry Rugby Club), and, Abbots Park. We recognise that this would need a proper evaluation and consultation.</p> <p>We would like to see the City Centre South plans evaluated by an independent assessor to see whether a better climate change outcome could be achieved within the context of the existing approved Hybrid planning consent.</p> <p>We would like to see an action plan developed for the development of independent retailers and businesses in the city centre (see chapter 6 above).</p>
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This document needs to be read in conjunction with [Coventry Local Plan Review: Regulation 18: Issues and Options Consultation](#). July 2023, and [Coventry Local Plan 2011 - 2031](#)