



Coventry City Council

Council Meeting

24th July 2012

Booklet 1

Recommendations

INDEX TO MINUTES

**Cabinet
10th July 2012**

CABINET

10th July 2012

Cabinet Members Present: Councillor Duggins (Deputy Chair)
Councillor Harvard
Councillor Kelly
Councillor Kershaw
Councillor J. Mutton (Chair)
Councillor O'Boyle
Councillor Ruane
Councillor Townshend

Non-Voting Opposition Representatives present: Councillor Blundell
Councillor Foster

Other Members Present: Councillor Mrs Fletcher
Councillor Hetherton
Councillor Lakha
Councillor McNicholas
Councillor Mrs M Mutton
Councillor Noonan

Employees Present: Directorate) H. Abraham (Customer and Workforce Services
M. Andrews (City Services and Development Directorate)
F. Collingham (Chief Executive's Directorate)
T. Darke (City Services and Development Directorate)
C. Forde (Finance and Legal Services Directorate)
R. Haigh (City Services and Development Directorate)
A. Harley (Children, Learning and Young People's Directorate)
S. Mangan (Finance and Legal Services Directorate)
B. Messinger (Director of Customer and Workforce Services)
M. Morrissey (City Services and Development Directorate)
M. Reeves (Chief Executive)
B. Walsh (Director of Community Services)
A. West (Chief Executive's Directorate)
C. West (Director of Finance and Legal Services)

Apologies: Councillor Khan
Councillor Mrs Lucas

RECOMMENDATION

Public business

10. Declarations of Interest

There were no declarations of interest.

11. **Coventry Local Development Plan: Core Strategy 2011-28 – Submission**

The Cabinet considered a report of the Director of City Services and Development the purpose of which was:

- To publish the Core Strategy, invite representations from the public and other stakeholders, and formally submit all required documentation to the Secretary of State.
- To formally consider the responses that have been received to the previous consultations around the strategy and distribution of growth (Proposed Core Strategy 2011) and the amount of growth (Options for a new housing target for Coventry 2011-2028)
- To consider the response received to the consultation about the revised Statement of Community Involvement, and to formally adopt the revised Statement of Community Involvement.

The Government had made numerous changes to the planning system since 2010. The National Planning Policy Framework (NPPF) (2012) had replaced the Planning Policy Guidance (PPG's) and Planning Policy Statements (PPS's), and the Localism Act 2011 includes provision to formally abolish the Regional (Spatial) Strategy (RSS). Pending the formal abolition of RSS, which required the Government to lay an Order before Parliament, it remained a part of the development plan for Coventry. The various legal challenges to the abolition of RSS have established that it is unlawful for a Council to take the expected abolition of RSS into account in its Core Strategy at this time, but the Localism Act post -dates this case law and provides the power for the Council to use locally-derived evidence to establish its own housing and other targets to supersede the RSS targets.

The previous Core Strategy (2009) was predicated on the RSS Phase II Revision Preferred Option, which required the re-distribution of significant housing from the origin of demand in the southern half of Warwickshire, to Coventry. It was not considered that this was deliverable, so it was appropriate to pursue a strategy that was deliverable.

The Localism Act and NPPF had replaced the formal upper tier of the development plan (RSS) with a "Duty to Cooperate", but has not set out in detail how that duty is to be discharged. The Council is taking steps to demonstrate compliance with the duty, and Members will be asked to consider a report to formally endorse the arrangements in due course.

The Council had updated its evidence base to provide a robust basis for new housing and employment land targets. This includes an updated Strategic Housing Land Availability Assessment (SHLAA), Strategic Housing Market Assessment (SHMA), and employment land study.

One of the key tests of "soundness" was the robust assessment of realistic alternative options. Coventry was in a unique position of having seven separate iterations of its Core Strategy, which have been developed over a period of seven years between 2005 and 2012. In addition to this, the recently completed "Options for a new housing

target for Coventry 2011 – 2028” consultation asked which of three different housing targets were preferred, as well as giving people the opportunity to put forward further alternatives. The responses were summarised at Appendix 3 of the report.

The two most recent consultations had established broad support for the realistic and deliverable strategy that was set out in the Core Strategy at Appendix 1 of the report. The responses to the “Proposed Core Strategy” consultation of autumn 2011 were summarised at Appendix 2 of the report.

The Statement of Community Involvement set out who and how consultation would take place in respect of planning issues and was reviewed in association with the Planning Advisory Service (PAS). The Council consulted the public and other stakeholders about the revised version of the SCI at the same time as the “Proposed Core Strategy” consultation during the autumn of 2011. This attracted a single response, which did not raise any fundamental issues to require significant changes to be made to the SCI. It is worthy of note that the revised SCI proposed only factual updates and other minor amendments, and it was therefore recommended that the Council formally considers the representation received and adopts the revised Statement of Community Involvement at Appendix 4.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, the Cabinet agreed to recommend that the City Council:

- (a) Approve publication of the document at Appendix 1 “Coventry Local Development Plan: Core Strategy 2011 – 2028” for representations for a period of six weeks, from Monday 30th July to Monday 10th September 2012**
- (b) Delegate to the Group Manager Planning & Building Control and Cabinet Member (City Development) to make such minor changes to the Core Strategy as may be considered appropriate, and to submit all required documentation to the Secretary of State as soon as practicable following the close of period for representations**
- (c) Note the responses that were received to the “Proposed Core Strategy”, at Appendix 2**
- (d) Note the responses that were received to the “Options for a new housing target for Coventry 2011 – 2028”, at Appendix 3**
- (e) Note the response to the draft, and formally adopt the amended Statement of Community Involvement at Appendix 4**
- (f) Approve expenditure of up to £150,000 to cover the costs of the required independent examination of the Core Strategy as described in section 5.1**

12. Warwick District Council New Local Plan – Preferred Options Consultation

The Cabinet considered a report of the Director of City Services and Development which set out the City Council's response to Warwick District Council's "New Local Plan Preferred Options" consultation. The document set out land that it considered suitable for development, and stated which land was 'preferred' for development. It was considered that, in general terms, the Preferred Options could be supported, but two "potentially suitable" sites to the south of Westwood Heath, and to the east of Finham, should remain as undeveloped Green Belt land.

Warwick District Council's "Preferred Options" for consultation included proposed site allocations to deliver growth, and some of these sites were currently undeveloped Green Belt land. It was considered that this was a matter for Warwick District Council as planning authority, and therefore no objection in principle to this is recommended.

The draft site allocations were shown on Map 3, Appendix 3 of the report. It was not recommended that any comments be made with respect to this.

A map of "potentially suitable" sites included some undeveloped Green Belt land immediately to the south of Westwood Heath, and east of Finham. Map 2 at Appendix 2 of the report refers. It was recommended that the Council objected in principle to the possibility of development of these sites, because it was likely that the burden of servicing the infrastructure requirements of those developments would fall on the City Council in the medium term, but that the corresponding Council Tax revenues would be received by Warwick District Council.

There were two realistic options available. The first was to remain silent, this was rejected because it was in the Council's interests to formally express its wish for the land south of Westwood Heath, and land to the east of Finham, that is identified as a "potentially suitable" site to remain as undeveloped land within the Green Belt.

The second option, which was recommended, was to formally respond in support of the Preferred Option, subject to the identified "potentially suitable" sites south of Westwood Heath and east of Finham remaining as undeveloped land in the Green Belt.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, the Cabinet agreed to recommend that the City Council approve the response to Warwick District Council New Local Plan Preferred Options consultation, at Appendix 1 of the report.

20. Review of Members' Allowance Scheme

The Cabinet considered a report of the Director of the Director of Customer and Workforce Services which requested Cabinet to consider recommendations that had been made by the Independent Remuneration Panel (IRP) on the Review of the Members' Allowance Scheme at Appendix A of the report. A supplementary report was submitted in June 2012 and this was also appended to the report at Appendix B of the report. A revised Members Allowances Scheme (Appendix C) was tabled.

All local authorities were required to have a Member Allowances and Expenses scheme which makes provision for a range of allowances and expenses available to some or all elected Members. This must be agreed locally, in accordance with the Local Authorities (Members Allowances) Regulations 2003 (as amended).

A local authority must review its allowance provisions at least once every four years if it had agreed to index-link its scheme of allowances. Coventry had index-linking arrangements for Member allowances; they were increased in line with the nationally-agreed annual pay award for local government employees, at spinal point 49 of the National Joint Council (NJC) Scheme, in April each year. Pay increases were last awarded in 2009. The last review was in 2007/08, reporting to Cabinet and Council in December 2007.

Whilst each authority approved its own scheme, it was legally required to appoint an Independent Remuneration Panel (IRP) to make recommendations on allowances and expenses. The Council must have regard to its recommendations. An IRP was appointed in October 2011 to undertake a review of the City Council's Members' Allowances Scheme. The scope and terms of reference of the IRP were detailed in the report.

The Panel had made 23 recommendations, with a detailed account supporting each recommendation. These were set out in pages 1-3 of this report, and in full detail in the Panel's report in Appendix A (note: Recommendation 6 had subsequently been deleted from the original 24, as explained in Appendix B). The recommendations all related to the scope of the IRP as follows:

- Annual adjustment (index-linking) of allowances
- Basic and special responsibility allowances paid to elected Members
- Co-optees allowances paid to Co-opted Members
- Consideration of allowances to be paid to Members sitting on both the Fostering and Adoption Panels
- Member expense arrangements including travel and subsistence
- Remuneration levels for the Lord Mayor and Deputy Lord Mayor positions.

The decision to approve these recommendations was the City Council's. The Council must have regard to the recommendations made by the IRP before it amended any part of the current Member Allowances scheme. The City Council was requested to consider these recommendations individually and state whether each recommendation was approved or rejected. The Council was not bound by the recommendations of the Panel and may reject any of the proposals made, but the City Council must have regard to the implications of such decisions; the report indicated that if some of the recommendations were not accepted then alternative provisions should be considered and these could be put forward and agreed.

The recommendations were being proposed separately rather than as a whole set, this meant that the City Council could accept, amend or reject individual recommendations. If some recommendations were rejected, then the remainder could be implemented.

There was a requirement for both the IRP recommendations and the authority's response to be widely publicised. Recommendations that were approved would need to

be incorporated in a revised scheme of allowances and expenses to be published within the Council's constitution.

It was proposed that the timescales for the next IRP be agreed in advance to aid planning. The next Panel needed to report by March 2016 at the latest. The draft timetable was as follows:

- establish Panel Membership January 2015
- Panel meetings held March 2015 – Sept 2015
- draft report produced – Oct 2015
- report considered by Cabinet and Council – by January 2016.

Members considered each of the proposed IRP recommendations and whilst accepting most the recommendations made, agreed that there were a number of recommendations that should be rejected. Where alternative proposals were made for rejected recommendations, these are set out in the resolution below.

In addition, it was agreed that, prior to the meeting of Council, members receive a document which showed the revised financial impact of the changes to allowances based on the Cabinet's recommendations.

RESOLVED that, after due consideration of the options and proposals contained in the report and matters referred to at the meeting, the Cabinet:

(a) Agreed to approve the timescale for the next Independent Remuneration Panel as set out in paragraph 2.10 of the report.

(b) Recommend to Council:

(i) That the following IRP recommendations be approved:

R1 Basic Allowance remains at the existing level of remuneration, currently £12,872 pa.

R2 Basic Allowance is paid to every elected Member i.e. including the Member elected as Lord Mayor.

R3 Special Responsibility Allowances (SRAs) for Leader, Deputy Leader, Cabinet Members, Leader of the Principal Opposition Group, Chairs of Scrutiny Boards and Chairs and Deputy Chairs of the Scrutiny Co-ordination, Planning, Licensing and Audit Committees remain at the existing levels of remuneration.

R4 Current SRA for the Lead Member for Standards be discontinued.

R5 Responsibility allowance of £1,000 is paid to the Chair of the Ethics Committee.

R8 Additional SRAs be approved for elected Members appointed to the authority's Fostering Panel and Adoption Panel, these SRAs to be set at £2,578.

R11 Allowances paid to each co-opted Member appointed by the City Council remain at the existing level, currently £466 pa.

R12 The Lord Mayor and Deputy Lord Mayor allowances be set at gross rate (before tax and National Insurance), in line with how basic allowances and other SRAs are treated.

R15 The City Council undertakes greater promotion of the Dependent Carers' Allowance Scheme, particularly in relation to the objective of encouraging the broadest representation of society on the Council.

R16 Notwithstanding the recent low level of claims for carers' allowances, specific budget provision, proposed at £2,000 pa, be made to underpin the Council's commitment to this scheme.

R17 Basic, Special Responsibility, Co-optees, Lord Mayor and Deputy Lord Mayor allowances be increased each year by the percentage increase in pay agreed for local government employees (pegged to spinal column point 49 of the NJC Scheme); this indexing to be effective from 1 April 2012 and expire on 31 March 2016.

R24 Following the determination of the issue of whether or not Coventry has an elected mayor, a full, in depth review of the Coventry City *[Council]* SRA structure and allowance levels be undertaken by a future IRP.

(ii) That the following recommendations be rejected with no alternatives:

R7 SRAs for Deputy Chairs of Scrutiny Boards be reduced from £2,578 to £1,000. *[This excludes Deputy Chair of Scrutiny Co-ordination Committee as per R3].*

R10 The City Council undertakes to produce formal job descriptions/person specifications of the roles and responsibilities of elected Members, particularly for positions which attract Special Responsibility Allowances.

R18 The 'Pick and Mix' allowance of £150 for each elected Member for stationery, equipment etc be abolished.

R19 In the event of the City Council deciding to continue this *[Pick and Mix]* scheme the 'custom and practice', but currently unauthorised, additional allowances for Group Officers and the Leader be discontinued.

R20 The Council introduces a single mode of provision of 'smart' phones for all Members, under authority-negotiated and financed contracts.

R21 All other modes of telephone provision and associated allowances paid to Members be discontinued at the earliest opportunity.

(iii) That, in respect of the following rejected IRP recommendations, the following alternatives be approved:

R9 Scrutiny Board Deputy Chair SRA remains at current level of £2,578

R13 Freeze Lord Mayor's Gross allowance at 2012/13 level of £42,696, made up of £12,578 basic allowance plus Mayoral allowance of £30,118.

R14 Freeze Deputy Lord Mayor gross allowance at 2012/13 of £13,156.

R22 The rates of travel and subsistence allowances paid to elected members be as set out in the Travel and Subsistence Scheme (contained within Appendix C) and attached to these minutes

R23 That the Travel and Subsistence Scheme (contained within Appendix C) be adopted

Note: R6 was deleted

(iv) That the Members Allowance Scheme (Appendix C) attached to these minutes be adopted.

(NOTE: This item was considered as urgent public business, the reason for urgency being to ensure that the Cabinet could consider the report and make recommendations to the next meeting of Council which is being held on 24th July 2012).

PART 6

MEMBERS' ALLOWANCES SCHEME

Coventry City Council
Members' Allowances Scheme

Coventry City Council, in exercise of the powers conferred by the Local Authorities (Members' Allowances) Regulations 2003 (the Regulations), hereby makes the following scheme:-

1. This scheme may be cited as the Coventry City Council Members' Allowances Scheme, and shall have effect for the Municipal Year commencing on 17th May 2012.
2. In this scheme,
"Council" means the Council of the City of Coventry
"Member" means an elected member of the Council

Basic Allowance

3. Subject to paragraph 10, a basic allowance of £12,872 will be paid to each Member.

Special Responsibility Allowances

4. (1) Special responsibility allowances will be paid to those Members who are appointed to the positions that are listed in the schedule to this scheme, or who are otherwise authorised by the Council to perform the duties which attach to those positions.
- (2) Subject to paragraph 10, the amount of each such allowance will be the amount specified against that special responsibility in that schedule.
- (3) No Member may receive more than one special responsibility allowance.

Travel and Subsistence

Approved duties for which travel and subsistence expenses may be claimed

5. (1) Members (including Co-opted Members) shall be entitled to receive travel and subsistence payments for duties carried out which are considered standard activities relating to the role of a councillor:
 - All meetings of the Council, the Executive, Committees, Sub-Committees and Panels
 - Meetings of a Joint Committee or body of which the authority is a member
 - Meetings of a local authority association of which the authority is a member
 - Meetings of some other body to which the authority makes appointments or nominations
 - Authorised conferences, seminars or training and development events
 - Any other duties approved by the authority in connection with discharging the functions of the authority
 - Briefings and agenda meetings with officers.
- (2) The following duties will NOT be regarded as "approved duties" for the payment of travel and subsistence expenses:-
 - Political group meetings
 - Attendance at Ward Surgeries
 - Constituency work including meetings with community groups
 - Site visits to meet constituents to carry out a Member's community leadership role
 - Attendance at meetings of School Governing Bodies
 - Attendance at meetings of any body within the Council's Constitution at which they are not a member or have not been invited to attend.
 - Attendance at meetings which are not listed as approved duties and in respect of which prior approval has not been given by the Council.

Travel expenses

6. (1) Wherever practicable, public transport should be used, the costs of which shall be paid directly by the authority or reimbursed to members.
- (2) Standard rail fares shall apply.
- (3) A councillor may be given an annual Coventry Bus Pass (at a value of £441 in 2012/13). If this is taken up, no other travel expenses within the City will be paid.
- (4) Where the use of public transport is not practicable, the cost of travel will be reimbursed at 45p per mile (for engines up to 1199cc) or at 48.5p per mile (for engines over 1199cc).
- (5) Costs of taxi fares (including a reasonable gratuity), tube fares, car parking and toll charges will be reimbursed where these were necessary.

Subsistence expenses

7. (1) For meals purchased outside the Coventry City area, the reasonable costs of purchasing a meal and non-alcoholic beverage or appropriate refreshment will be reimbursed, subject to the provision of supporting receipts.
- (2) Accommodation must be booked through the Council. Value for money and the circumstances of each event will be taken in to account.
- (3) For overnight stays, the reasonable cost of minor out of pocket expenses will be reimbursed.
- (4) The costs of accommodation and/or meals arising in relation to approved duties shall be paid directly by the authority where possible or, where this is not possible, reimbursed to members.

Other Allowances

8. (1) A stationery allowance of £150 per year shall be made available to each Member.
- (2) A telephone line rental allowance of £30.15 per quarter shall be available to each Member.
- (3) A maximum telephone allowance of £488.80 per year shall be available to each Member.
- (4) A Dependent Carers' Allowance may be claimed in accordance with the terms of the Dependent Carers' Allowance Scheme appended to this Scheme.
- (5) A co-opted member's allowance of £466 per annum shall be paid to each co-opted member appointed by the City Council.

Renunciation

9. A Member may by notice in writing given to the Director of Customer and Workforce Services elect to forgo any part of his entitlement to an allowance under this scheme.

Part-year Entitlements

10. Where the term of office of a Member or the entitlement to a special responsibility allowance begins or ends at a time other than at the beginning or end of the Municipal Year, the entitlement to

basic or special responsibility allowance will be based on the proportion of time which the service or special responsibility bears to the full year.

Payments

11. (1) Payments shall be made in respect of basic and special responsibility allowances, subject to sub-paragraph (2), in monthly or half-yearly instalments according to each Member's preference as expressed to the Director of Finance and Legal Services.
- (2) Where a payment under this scheme in respect of a basic allowance or a special responsibility allowance would result in the Member receiving more than the amount to which, by virtue of paragraph 6, he or she is entitled, the payment shall be restricted to such amount as will ensure that no more is paid than the amount to which he or she is entitled.
- (3) Payments made under this scheme for basic and special responsibility allowances will be increased in line with the nationally agreed annual pay award for local government employees (linked to spinal point 49 of the NJC Scheme) in April of each year.
- (4) Nominated officers shall be authorised to approve expenditure outside the normal travel and subsistence rates, and generally adjudicate on claims, where required.
- (5) Travel and subsistence claims must be:
 - for actual expenditure
 - submitted in a form determined by the authority
 - accompanied by evidence of expenditure with receipts
- (6) Claims must be made within three months of the date of the expenditure or else forfeited unless exceptional circumstances can be justified as to why this timescale could not be achieved.

Withholding of Allowances

12. (1) Where a member is suspended or partially suspended from their responsibilities or duties as a member of the authority in accordance with Part III of the Local Government Act 2000 or regulations made under that Part, those parts of the Basic Allowance, any Special Responsibility Allowance and Travel and Subsistence Allowances payable to them in respect of the period for which they are suspended or partially suspended may be withheld by the authority.
- (2) Where payment of any allowance has already been made in respect of any period during which the member concerned is suspended or partially suspended from their responsibilities or duties as a member of the authority in accordance with Part III of the Local Government Act 2000 or regulations made under that Part; the authority may require that such part of the allowance as relates to any such period be repaid to the authority.

13. SCHEDULE OF SPECIAL RESPONSIBILITY ALLOWANCES

Subject to the provisions of section 10 of this Scheme, special responsibility allowances shall be paid to those councillors who are appointed to the positions listed below or are otherwise authorised by the Council to perform the duties which attach to any of those positions, and the amounts of those allowances shall be the amounts specified against each position:-

	£
Leader of the Council	£23,169.00
Deputy Leader of the Council	£16,731.00
Leader of the Opposition Group	£3,860.00
Other Cabinet Members	£10,299.00
Scrutiny Co-ordination Committee Chair	£10,299.00
Scrutiny Co-ordination Committee Deputy Chair	£2,578.00
Scrutiny Board Chairs	£6,439.00
Scrutiny Board Deputy Chairs	£2,578.00
Audit Committee Chair	£6,439.00
Audit Committee Deputy Chair	£2,578.00
Planning Committee Chair	£6,439.00
Planning Committee Deputy Chair	£2,578.00
Licensing and Regulatory Committee Chair	£6,439.00
Licensing and Regulatory Committee Deputy Chair	£2,578.00
Ethics Committee Chair	£1,000.00
Member on Fostering Panel	£2,578.00
Member on Adoption Panel	£2,578.00

Dependant Carers' Allowance Scheme

14. Councillors may claim a dependant carers' allowance where they incur expenditure on the care of children or other dependants when undertaking the following approved duties:
- (1) All formal meetings of the Council where the attendance of the Councillor is required.
 - (2) Any Working Groups/Review Groups/Consultation meetings arranged by the Council which the Councillor is required to attend.
 - (3) Attendance at training sessions, seminars, briefing meetings organised by the Council.
 - (4) Attendance at Conferences organised or approved by the Council and/or Cabinet.
 - (5) Attendance at meetings of other bodies, including School Governors meetings, where the Councillor has been appointed by the Council as a representative of the Council.
 - (6) Briefing/Consultation meetings with officers by Cabinet Members or members with special responsibility holding appointed positions.
 - (7) The carrying out of any other duty approved by the Council or any duty of a class so approved, for the purpose of, or in connection with the discharge of the functions of the Council.
15. The allowance that can be claimed will be:
- For the dependant care of a child (under the age of 14) the actual costs that are incurred but not exceeding the hourly rate for the national adult minimum wage. (From October 2005 this will be £5.05 and it is proposed that this rate will be increased on an annual basis in line with the minimum wage increase for adults aged 22 and over)
 - For the professional care of a dependant relative, the maximum hourly rate will be the Council's hourly rate for a Care Assistant.

16. A written declaration will be lodged with the Standards Committee by a Councillor intending to claim the allowance.
17. The care can only be provided for a person who normally lives with the Councillor as part of their family.
18. The carer cannot be a member of the Councillor's immediate family or a person normally resident at the Councillor's home address.
19. Receipts must be provided with all claims and the claim must be made within two months from the date for which the allowance is claimed.

(NOTE: In order to amend the Members' Allowance Scheme an Independent Remuneration Panel will be required to make recommendations to and be accepted by the Council.)

Cabinet
Council

10 July 2012
24 July 2012

Name of Cabinet Member:

Cabinet Member (City Development) - Councillor Kelly

Director Approving Submission of the report:

Director of City Services & Development

Ward(s) affected:

All

Title:

Coventry Local Development Plan: Core Strategy 2011 – 2028 "Submission"

Is this a key decision?

Yes

To approve publication of the document at Appendix 1 for representations for a period of 6 weeks, between Monday 30th July 2012 and Monday 10th September 2012.

To delegate to the Group Manager Planning & Building Control and Cabinet Member for City Development to make minor changes to the draft Core Strategy and to submit all required documentation to the Secretary of State following the end of the statutory period of representations.

To note the responses to the "Proposed Core Strategy" at Appendix 2

To note the responses to the "Options for a new housing target for Coventry 2011 – 2028" at Appendix 3

To note the response to the draft Statement of Community Involvement, and formally adopt the amended Statement of Community Involvement at Appendix 4

Executive Summary:

There are three purposes to this report. The first is to publish the Core Strategy, invite representations from the public and other stakeholders, and formally submit all required documentation to the Secretary of State.

The second purpose is to formally consider the responses that have been received to the previous consultations around the strategy and distribution of growth ("Proposed Core Strategy 2011") and the amount of growth ("Options for a new housing target for Coventry 2011 – 2028")

The final purpose of the report is to consider the response that was received to the consultation about the revised Statement of Community Involvement, and to formally adopt the revised Statement of Community Involvement.

Recommendations:

Cabinet is requested to recommend to Council:

- 1) To approve publication of the document at Appendix 1 "Coventry Local Development Plan: Core Strategy 2011 – 2028" for representations for a period of six weeks, from Monday 30th July to Monday 10th September 2012
- 2) To delegate to the Group Manager Planning & Building Control and Cabinet Member (City Development) to make such minor changes to the Core Strategy as may be considered appropriate, and to submit all required documentation to the Secretary of State as soon as practicable following the close of period for representations
- 3) To note the responses that were received to the "Proposed Core Strategy", at Appendix 2
- 4) To note the responses that were received to the "Options for a new housing target for Coventry 2011 – 2028", at Appendix 3;
- 5) To note the response to the draft, and formally adopt the amended Statement of Community Involvement at Appendix 4; and
- 6) To approve expenditure of up to £150,000 to cover the costs of the required independent examination of the Core Strategy as described in section 5.1

Council is requested to:

- 7) Approve the publication of the document at Appendix 1 "Coventry Local Development Plan: Core Strategy 2011 – 2028" for representations for a period of six weeks, from Monday 30th July to Monday 10th September 2012
- 8) Delegate to the Group Manager Planning & Building Control and Cabinet Member (City Development) to make such minor changes to the Core Strategy as may be considered appropriate, and to submit all required documentation to the Secretary of State as soon as practicable following the close of period for representations
- 9) Note the responses that were received to the "Proposed Core Strategy", at Appendix 2
- 10) Note the responses that were received to the "Options for a new housing target for Coventry 2011 – 2028", at Appendix 3;
- 11) Note the response to the draft, and formally adopt the amended Statement of Community Involvement at Appendix 4; and
- 12) Approve expenditure of up to £150,000 to cover the costs of the required independent examination of the Core Strategy as described in section 5.1

List of Appendices included:

Appendix 1: "Coventry Local Development Plan: Core Strategy 2011 – 2028"

Appendix 2: Summary of responses received to "Proposed Core Strategy" consultation of autumn 2011

Appendix 3: Summary of responses received to the "Options for a new housing target for Coventry 2011 – 2028" consultation of spring 2012

Appendix 4: Revised Statement of Community Involvement, and response received to the consultation held in autumn 2011.

Other useful background papers:

Responses received to the “Proposed Core Strategy” consultation of autumn 2011
Available at www.coventry.gov.uk/ldf

Responses received to the “Options for a new housing target for Coventry 2011 – 2028” consultation of spring 2012
Available at www.coventry.gov.uk/ldf

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

Yes, Local Development Framework Cabinet Advisory Panel

Will this report go to Council?

Yes

24th July 2012

1. Context (or background)

National Planning System

- 1.1 The Government has made numerous changes to the planning system since 2010. The National Planning Policy Framework (NPPF) (2012) has replaced the Planning Policy Guidance (PPG's) and Planning Policy Statements (PPS's), and the Localism Act 2011 includes provision to formally abolish the Regional (Spatial) Strategy (RSS). Pending the formal abolition of RSS, which requires the Government to lay an Order before Parliament, it remains a part of the development plan for Coventry. The various legal challenges to the abolition of RSS have established that it is unlawful for a Council to take the expected abolition of RSS into account in its Core Strategy at this time, but the Localism Act post dates this case law and provides the power for the Council to use locally-derived evidence to establish its own housing and other targets to supersede the RSS targets.
- 1.2 The previous Core Strategy (2009) was predicated on the RSS Phase II Revision Preferred Option, which required the re-distribution of significant housing from the origin of demand in the southern half of Warwickshire, to Coventry. It is not considered that this is deliverable, so it is appropriate to pursue a strategy that is deliverable.
- 1.3 The Localism Act and NPPF have replaced the formal upper tier of the development plan (RSS) with a "Duty to Cooperate", but has not set out in detail how that duty is to be discharged. The Council is taking steps to demonstrate compliance with the duty, and Members will be asked to consider a report to formally endorse the arrangements in due course.

Legal compliance of the Core Strategy

- 1.4 The Council has updated its evidence base to provide a robust basis for new housing and employment land targets. This includes an updated Strategic Housing Land Availability Assessment (SHLAA), Strategic Housing Market Assessment (SHMA), and employment land study.
- 1.5 One of the key tests of "soundness" is the robust assessment of realistic alternative options. Coventry is in a unique position of having seven separate iterations of its Core Strategy, which have been developed over a period of seven years between 2005 and 2012. In addition to this, the recently completed "Options for a new housing target for Coventry 2011 – 2028" consultation asked which of three different housing targets were preferred, as well as giving people the opportunity to put forward further alternatives. The responses are summarised at **Appendix 3**, and are available in full at www.coventry.gov.uk/ldf
- 1.6 The two most recent consultations have established broad support for the realistic and deliverable strategy that is set out in the Core Strategy at **Appendix 1**. The responses to the "Proposed Core Strategy" consultation of autumn 2011 are summarised at **Appendix 2**, and set out in full at www.coventry.gov.uk/ldf

Publishing the Submission Core Strategy for Representations

- 1.7 The final stage of the Core Strategy process before formal Submission to the Secretary of State is to publish the document and invite representations about its "soundness". This is distinct from a consultation, because responses must relate to the tests of "soundness" as

described by the relevant regulations. At the close of the representations period, all responses will be collated and submitted, along with the Core Strategy and evidence base, to the Secretary of State. The Secretary of State will then appoint an independent Inspector, who will conduct an Examination in Public. This is similar to a public inquiry, and following the close of the Hearings the Inspector will issue a report to the Council. At this point, the Council may proceed to adopt the Core Strategy and it will then replace the 2001 Coventry Development Plan “saved” policies.

- 1.8 It may be necessary to make minor amendments to the Core Strategy before formally Submitting the Core Strategy. It is intended that the Council delegate responsibility for this, should the need arise, to the Group Manager Planning & Building Control and Cabinet Member for City Development. This is to avoid the need for a further report and the delay to the process that would result. In the event that significant changes are necessary, a specific report will be prepared for Council to consider.

Considering the responses received to the “Proposed Core Strategy” consultation of Autumn 2011 and the “Options for a new housing target for Coventry 2011 – 2028” consultation of Spring 2012

- 1.9 In order that the Core Strategy is legally compliant, the Council needs to formally consider all comments that have been received. It is therefore recommended that comments summarised at Appendices 2 and 3, and set out in full at www.coventry.gov.uk/ldf are noted by the Council.
- 1.10 The “Proposed Core Strategy” responses were few (less than 100), despite considerable efforts to engage with people. Opinion was broadly split between those who are promoting the development of Green Belt and/or greenfield land, usually for housing, and those who support protecting the Green Belt and greenfield land from development.
- 1.11 The “Options for a new housing target for Coventry 2011 – 2028” consultation attracted 195 responses, with opinion once again split between those who are promoting the development of Green Belt and/or greenfield land for housing, and those who wish to protect the Green Belt and greenfield land from development. Option 2 (economic growth scenario) attracted the highest level of support at 44% of all responses, followed by 30% (almost exclusively those associated with the development industry) who supported Option 3 (the Government’s ONS figure). The Option 2 figure has been used by the Core Strategy at **Appendix 1**, which is supported by both a robust evidence base and a clear mandate following the consultation undertaken to date.
- 1.12 The three housing options were tested against the sustainability objectives in appraisal matrices to identify the likely positive effects and potential negative impacts. Headline findings of this appraisal concluded that options 2 and 3 (11,373) and (20,655) respectively were likely to have an overall positive effect, although option 2 scored the higher overall sustainability scoring. This was mainly on the economic, but indirectly also on socio-environmental aspects of sustainability. Option 1 (9,690) was likely to be less positive and attract a higher number of potential negative effects. Amongst the positive effects that were likely to be realised through option 2 included:
- No housing estate developments in the Coventry Green Belt, Green Spaces and any other green area within the city;
 - Provision of new employment and training opportunities;
 - Encouraging greater use of public transport and more sustainable modes of travel;
 - Reduction in social exclusion and poverty by providing accessibility to housing and employment needs in the most deprived neighbourhoods;
 - Promotion of improved health opportunities through the protection of green open spaces;

- Reduction in the level of personal car travel through carefully planned development; and
- Enhanced built environment within the city centre.

The Submission Core Strategy

- 1.13 The Submission Core Strategy at **Appendix 1** is, as far as possible, similar to the previous Submitted Core Strategy that was found “sound” in 2010. However, there are a number of key differences that are set out below:
- 1.14 **Quantum of development.** The Submission Core Strategy proposes a different scale of growth, which is scaled back to reflect economic and other realities, and has the effect of negating the need for Green Belt and/or greenfield land to be allocated for housing development in or adjacent to Coventry to meet its robustly assessed housing needs. Correspondingly, the B-class (office, manufacturing and general industry, and storage and distribution) employment land requirements are reduced.
- 1.15 **Pattern of development.** This changes from a focus on previously-developed land during the first part of the plan period, followed by substantial areas of Green Belt and greenfield land being developed mainly for housing; to previously-developed land being used within identified ‘spoke’ areas centred around the city centre as the commercial hub, to drive urban regeneration, meeting Coventry’s needs without requiring Green Belt or greenfield land to be developed for housing.
- 1.16 **Affordable housing.** The policy with respect to affordable housing is more sophisticated, following a fundamental review as part of the SHMA. The city is now split into two different categories by housing values, and different proportions of affordable housing will be sought in each of these two zones. The higher value zone will be subject to a 35% requirement, and the low-medium value zone will be subject to a 25% requirement. This is to recognise the differences in viability and deliverability of new housing between the two zones, as well as to rebalance the housing types and tenures across the city to create and maintain balanced and mixed communities.
- 1.17 **Employment land requirement.** This is set at a minimum of 100 hectares for the plan period, and 30 hectares of land with planning permission to be maintained at all times. In the event that the supply falls to such an extent that it is at risk, the Council will allocate sites to replenish the ‘reservoir’ of sites. The difference is that the previous reservoir was 82 hectares, and the total was 288 hectares. Monitoring and the updated employment land study have demonstrated that this was excessive.
- 1.18 **Strategic centres hierarchy.** To recognise the changes in circumstances and function of two centres, it is proposed to swap them in the hierarchy. These are Ball Hill Major District Centre, which becomes a District Centre, and Brandon Road District Centre, which becomes a Major District Centre. It is also proposed to delete Brade Drive from the hierarchy of centres altogether.
- 1.19 **Heritage assets.** The NPPF sets out that non-designated assets (those that are not Listed or Scheduled Monuments) that are of local significance can be treated with the respect that they deserve, and the Core Strategy describes an approach that affords non-designated heritage assets a suitable degree of protection, for instance locally-listed buildings.
- 1.20 **New Canal Conservation Area.** The Canal Conservation Area that was confirmed in June 2012 is shown on the Proposals Map, and is afforded the same degree of protection as the other Conservation Areas in Coventry.

- 1.21 **Sustainability requirements.** Locally-specific evidence has been compiled to determine and justify local sustainability standards to place Coventry at the vanguard of sustainable building technologies. This is consistent with the city's stated intention to become a leader in green technologies.
- 1.22 **Health.** Coventry City Council has benefitted from a Public Health Practitioner seconded to the Planning Department from the NHS, and this has resulted in health becoming a cross-cutting theme of the Core Strategy. This partnership continues to progress a Supplementary Planning Document, related to the policy framework that has been collaboratively developed, to manage hot food takeaways, for instance.

Statement of Community Involvement (SCI)

- 1.23 The Statement of Community Involvement sets out who will be consulted, how and when they will be consulted, with respect to planning issues, and was reviewed in association with the Planning Advisory Service (PAS). The Council consulted the public and other stakeholders about the revised version of the SCI at the same time as the "Proposed Core Strategy" consultation during the autumn of 2011. This attracted a single response, which did not raise any fundamental issues to require significant changes to be made to the SCI. It is worthy of note that the revised SCI proposed only factual updates and other minor amendments, and it is therefore recommended that the Council formally considers the representation received and adopts the revised Statement of Community Involvement at **Appendix 4**.

2. Options considered and recommended proposal

Core Strategy

- 2.1 There are three realistic options available to the Council with respect to the Core Strategy.
- 2.2 The first of these is to accept recommendation 6 and approve the publication of the Submission Core Strategy at **Appendix 1** to invite representations as to its "soundness" for a period of six weeks. This is the recommended proposal.
- 2.3 The second option is to proceed to adopt the draft Core Strategy of 2009, that was subject to Examination in Public and found "sound" in 2010. It is not recommended that this option is pursued, because it is not considered to be deliverable, and would put Green Belt and greenfield land at unnecessary risk of development, to the detriment of both the green environment and the viability of regeneration within the 'hub and spokes'.
- 2.4 The third option is to do nothing, and rely on the NPPF. It is not recommended that this option is pursued, as it introduces considerable ambiguity and uncertainty that potentially places the Green Belt and greenfield land at unnecessary risk of development, to the detriment of both the green environment and the viability of regeneration within the 'hub and spokes'.

Responses to previous consultations

- 2.5 There are two realistic options available to the Council with respect to the responses to the previous consultations.
- 2.6 The first of these is to note the responses received at **Appendices 2 and 3**, in order that the Core Strategy is legally compliant. This is the recommended proposal.

- 2.7 The second is to do nothing. This is not the recommended proposal because it places the Core Strategy at risk through not being legally compliant, and therefore the Council would be unable to submit the Core Strategy to the Secretary of State for Examination in Public.

Statement of Community Involvement

- 2.8 There are two options available to the Council with respect to the revised Statement of Community Involvement and the consultation response that was received, at **Appendix 4**.
- 2.9 The first is to note the response received and formally adopt the revised SCI. This is the recommended proposal.
- 2.10 The second is to do nothing. This is not recommended, because it would mean an inferior SCI would need to be used. While it is legally compliant, the current SCI should be updated in accordance with **Appendix 4**.

3. Results of consultation undertaken

- 3.1 The consultation responses received to date have broadly fallen into two groups, those who are promoting Greenfield and Green Belt land for development, mainly for housing, and those who are principally concerned with protecting Greenfield and Green Belt land from all development.
- 3.2 This has consistently been the case since the start of the process in 2005, with a peak of representations in 2009 when petitions containing in excess of 2,000 signatures were presented in opposition to the allocation of Green Belt land in Keresley for development.
- 3.3 The Council is now in a position where it has a clear mandate from local people to protect the Green Belt and Greenfield land from development of housing estates, and a sustained opposition from developers who are seeking the city's housing target to be set at such a level as to require Greenfield and/or Green Belt land to be developed to meet that target. It was notable that, when given three options for a new housing target, the lowest of these did not attract the highest level of support. In fact, there is broad consensus that Coventry needs growth at a level higher than that which has been achieved during the last two decades: the disagreement is about how much higher.
- 3.4 It is intended that the Core Strategy will be published and representations invited as to its "soundness" in accordance with the regulations and the Council's adopted Statement of Community Involvement at the time. This will include:
- Writing to all statutory consultees and neighbouring Councils, enclosing a copy of the document and confirming how and when representations should be made;
 - Writing to all others on our database of consultees to notify them that the publication period is underway, and how they can access the document;
 - Placing copies of the document in all publicly accessible Council offices, and all libraries in the city;
 - Placing a copy of the document on the Council's web site, together with details of how and when representations should be made; and
 - Placing an advertisement in the local press, with details of how and when representations should be made.

4. Timetable for implementing this decision

- 4.1 It is intended that the period of publication for representations will begin on Monday 30th July, and end on Monday 10th September. All representations received will be submitted to the Secretary of State alongside the Core Strategy and other associated documentation.

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

There are two sets of costs associated with this report.

The first is associated with the publication of the documents for representations, and is principally concerned with printing and postage of letters and the document itself. These costs will be absorbed within existing budgets.

The second is the substantial costs of the Examination in Public of the Core Strategy. The Secretary of State will appoint an Inspector to conduct the Hearings, and the Council is required to appoint a Programme Officer who works for the Inspector to make sure the Hearings run smoothly. Both the Inspector and Programme Officer are at the Council's expense. This is estimated at £150,000, and money has been secured to cover this cost from the central budget.

5.2 Legal implications

The period of publication for representations of six weeks is prescribed by the regulations, and it is noteworthy that the period cannot be either extended or shortened

The period of publication for representations will ensure that the Council can demonstrate that the Core Strategy is fully legally compliant. A Core Strategy that is not fully legally compliant cannot proceed to Examination in Public. The provisions of the Planning & Compulsory Purchase Act 2004 and Localism Act 2011 set out the relevant provisions governing the matters raised in this report, including that the Council has a duty to have a development plan.

6. Other implications

There are no other specific implications

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

The proposed consultation will contribute to a number of the Council's core aims as follows:

- A prosperous Coventry: Choosing the right housing target will ensure that sufficient new homes are provided to meet the needs of local people, and that businesses are not deprived of staff through a lack of housing;
- Making Coventry an attractive and enjoyable place to be. Choosing the right housing target will strike the correct balance that provides enough new homes for local people, and protects the Green Belt from inappropriate development;
- Providing a good choice of housing. This is a key requirement when choosing a housing target;
- Making places and services easily accessible. Choosing a housing target will, in practical terms, ensure that the right amount of new development happens to ensure that services are viable and accessible;
- Developing a more equal city with cohesive communities and neighbourhoods. One of the benefits of choosing the right housing target will be that more people will be adequately housed; and

- Improving the environment and tackling climate change. Choosing the right housing target will bring about improvements to areas in need of investment, and will protect the Green Belt from inappropriate development.

6.2 How is risk being managed?

There are a number of significant risks, which the Core Strategy is designed to manage, and others concerned with legal compliance with procedures.

Policy Risks

The NPPF, in essence, says that where a local plan is silent or indeterminate, or not up to date, then the NPPF itself takes the place of the development plan for the purposes of determining the relevant planning application. This risks a 'planning by appeal' situation whereby the Council has little influence over development in Coventry. The Core Strategy will significantly reduce this risk.

There is a remote possibility that the RSS is abolished by the Government, and a flurry of activity calls part of the Core Strategy into question. This is beyond the Council's control, and it is considered that the likelihood of turmoil is remote so it is recommended to proceed to submit the Core Strategy.

Procedural Risks

The key area of challenge that has been put to the Core Strategy to this point has been a technicality that it is using locally derived evidence to support the housing target, and not the Government's ONS figures. This is a new area for all concerned, so it has to be a possibility that the plan could be not found to be "sound" by the Inspector. However, the Core Strategy takes a robust approach to using its evidence to reduce this risk.

The Duty to Cooperate requires the Council and other partners to make formal agreements around strategic planning issues. There is a risk that a key partner refuses to formally sign up to an appropriate agreement. Under these circumstances, there is a risk that the plan could be not found to be "sound" by the Inspector, but this is a new procedure and the Council is taking steps to secure these formal agreements. Notwithstanding this, it is considered that the risks associated with the Duty to Cooperate are the most pressing of those identified for the Coventry Core Strategy.

6.3 What is the impact on the organisation?

Planning is a statutory function of the Council, the development of a new Core Strategy will provide the corner stone of the new Coventry Local Development Plan, guiding the regeneration and other development of the city until 2028.

6.4 Equalities / EIA

The section 149 duty requires the Council to pay due regard to the three aims of the Equality Act 2010 and when exercising functions, the Council will need to consider the impact on people protected by the Equality Act 2010. This will require some analysis of these issues in order to determine any equality impact. An Equality Impact Assessment of the Core Strategy will be completed prior to its Submission to the Secretary of State.

6.5 Implications for (or impact on) the environment

A Sustainability Appraisal, incorporating the EU requirements of Strategic Environmental Assessment, (or SA/SEA for short) is a statutory requirement which aims to promote sustainable development through the integration of economic, environmental and social considerations into the preparation plans or programmes. A key function of the Sustainability Appraisal is to illustrate the benefits and risks of different policy options, identify potential negative effects and suggest appropriate mitigation measures. A SA/SEA of the Core Strategy will be published alongside the Core Strategy.

6.6 Implications for partner organisations?

Partner organisations, notably neighbouring Councils and the Local Enterprise Partnership, will be impacted because they have a responsibility to formally reach agreement with the Council with respect to strategic matters such as the Core Strategy. This is to discharge the Duty to Cooperate, as described by the Localism Act and NPPF.

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This report is published on the council's website:
www.coventry.gov.uk/councilmeetings

Appendices

Appendix 1: “Coventry Local Development Plan: Core Strategy 2011 – 2028”

Appendix 2: Summary of responses received to “Proposed Core Strategy” consultation of autumn 2011

Appendix 3: Summary of responses received to the “Options for a new housing target for Coventry 2011 – 2028” consultation of spring 2012

Appendix 4: Revised Statement of Community Involvement, and response received to the consultation held in autumn 2011.

Coventry Core Strategy 2011 – 2028 Submission Draft

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**Coventry Local Development
Plan**

Section 1

Introduction

Core Strategy Submission Draft

Purpose

1.1

This is the City Council's proposed Submission Document for the Core Strategy Development Plan Document (DPD). The Council is seeking representations on its "soundness" prior to submitting it to the Secretary of State for an independent examination by an Inspector appointed under the terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004.

1.2

The Core Strategy delivers the spatial aspects of the City's Sustainable Community Strategy and of other relevant strategies. It is one of the documents that will form the Local Development Framework. It contains strategic policies which will guide the future development of the city up to 2028: all other documents within the Local Development Framework must be consistent with it. In turn, the Core Strategy has to be consistent with national and regional policy and these must be applied when considering proposals for development.

The Story So Far

1.3

The preparation of the Core Strategy has involved both gathering an evidence base of research on a variety of topics and a series of stages of policy development which have sought to engage with local communities, stakeholders and partners. The different components of the evidence base are described in Chapters 6 – 10 of this document. Chapter 2 deals with previous consultation.

Issues and Options	The Options	Emerging Core Strategy	Publication for Submission	Examination	Proposed Core Strategy	Publication for Submission	Examination	Adoption
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Getting Involved

1.4

We invite you to make formal representations on any part or all of this document. A consultation period will take place from 30th July 2012 to 10th September 2012. You can find information on the Council's web site (www.coventry.gov/ldf) and at libraries and other Council buildings.

1.5

You can make representations on-line, by e-mail or by post.

Next Stage

1.6

The Submission Document is the penultimate stage in the preparation of the Core Strategy. It is published in order to invite formal representations to be made about its 'soundness'. The Secretary of State will appoint an independent Inspector who will chair a public examination, at which he or she will consider the Core Strategy and relevant representations.

1.7

At the public examination, the Inspector will be considering the 'soundness' of the plan in the context of the requirements of the 2004 and 2011 Acts and any other relevant regulations and government guidance. These will be matters on which representations should be based. To be 'sound', the core strategy should be:

- justified (founded on proportionate evidence base and the most appropriate strategy when considered against the reasonable alternatives);
- effective (deliverable and based on effective joint working on cross-boundary strategic priorities); and
- consistent with national policy.

The National Planning Policy Framework (NPPF) put forward an extra 'soundness' test:

- positively prepared (the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)

1.8

The Inspector's report will be binding on the City Council. The Core Strategy will be supplemented by other Documents, including:

- Site Allocations;
- Community Infrastructure Levy Charging Schedule;
- City Centre Area Action Area Plan;
- Proposals Map; and
- Supplementary Planning Documents.

1.9

If the Inspector concludes that the Core Strategy satisfies the requirements of section 20(5) of the Act and the associated Regulations, is 'sound' in terms of section 20(5)(b) of the Act and meets the test of 'soundness' in the NPPF, with or without amendments, the Council will then be able to adopt it for the timescale of the plan, subject to the requirement for annual monitoring.

**Coventry Local
Development Plan**

Section 2

**Preparing the Core Strategy:
Consultation and Assessments**

Core Strategy Submission Draft

2.1

The preparation of the Core Strategy has been influenced by a number of stages of engagement with key stakeholders and the community, consultation and appraisals. These are summarised below.

Consultation

2.2

Consultation on the Issues and Options for the Core Strategy took place in the Summer of 2006 and The Options between July and October 2007. These reports presented the “spatial portrait” of the City, described the issues facing the Core Strategy and outlined the alternative ways of dealing with them.

2.3

Consultation on the Emerging Core Strategy (Emerging Strategy) took place in November and December 2008. This report presented the spatial options for the future development of the City and put forward the preferred approach for a range of policies.

2.4

Representations on the Emerging Strategy can be generally categorised as:

- matters for inclusion in the plan raised by “specific consultees”;
- representations made by and on behalf of private sector bodies, either to promote sites (mainly in Green Belt areas) or to propose courses of action based on particular interests;
- opposition to possible development from Parish Councils, residents’ groups and individuals, both inside and outside Coventry, concerned about encroachment into the Green Belt and the value of the landscape; and
- representations in respect of retail policy.

2.5

Between 15-20% of representations expressed views on the five options for future development. There was no clear consensus in favour or against any option.

2.6

Consultation on the Proposed Core Strategy took place during September and October 2011. This document presented the "Hub and Spokes" strategy for accommodating development, as well as the jobs-led strategy that avoids development of housing estates on Green Belt land.

2.7

Responses to this document were broadly split between local people who oppose development and therefore supported the broad strategy, and those interests who are promoting Green Belt / other Greenfield land for development and who were therefore opposed to the strategy. It remains the case that there is no clear consensus in favour or against any of the options that have been put forward since 2006.

2.8

Consultation on options for a new housing target took place between March and May 2012, and asked people to choose which of three potential housing targets they

prefer. Responses to this document were broadly split between those who are promoting development of Green Belt and/or Greenfield land for development, and those who oppose Green Belt and/or Greenfield development. The most popular option was the economic growth scenario, which was higher than past trends, but lower than the ONS projections. It would not require Green Belt or Greenfield land to be developed for housing.

Sustainability Appraisal

2.9

Sustainability Appraisal is a systematic process that assesses the economic, environmental and social effects of a plan. A revised Scoping Report has been produced in order to support the sustainability appraisal process throughout the Coventry Local Development Plan. Appraisals have been carried out at each stage of plan preparation as required by the Act and the Town and Country Planning (Local Development) (England) Regulations 2004 (Regulations).

2.10

The appraisal of the Issues and Options mirrored preferences expressed in overall consultation, the most sustainable options for accommodating growth being the use of previously-developed land, focussing development on the City Centre and by means of increasing densities.

2.11

The options in the Emerging Strategy covering development within the built-up area were the most sustainable.

2.12

The positive sustainability benefits of the Emerging Strategy covered aspects such as: regeneration; meeting housing needs; encouraging sustainable transport; and encouraging sustainable design. Negative effects include: the cumulative effects of increased development; related increased energy use; and impacts of new development on landscape and green spaces. Emerging policy directions have already sought to mitigate the negative effects of development and maximise opportunities.

2.13

The appraisal of the draft Submission Document identified some minor changes to policies to better reflect sustainability issues.

2.14

The appraisal of the Proposed Core Strategy concluded the overall impact of the emerging plan on the 20 local sustainability objectives is likely to be positive. However, it suggests the following changes to the document to improve its performance even further:

- To identify, and incorporate in the Core Strategy measures to increase the self-sufficiency;
- Carefully plan any high density developments and ensure that the provision of new homes is not in excess of local need.
- Ensure the appropriate provision of Sustainable Urban Drainage Systems (or SUDS for short) within new development to minimise the risk of flooding.

- Achieve high design standards in new developments, especially to protect historic environment within city centre and create local distinctiveness.

2.15

The Submission Draft SA/SEA to completed following the assessment.

Equalities Impact Assessment

2.16

An Equalities Impact Assessment of the Proposed Core Strategy found that the objectives and policy areas address the overarching principles of community cohesion, social inclusion and accessibility.

Health Impact Assessment

2.16

A Health Impact Assessment (HIA) of the Core Strategy has been completed, covering factors which have the potential to improve health and well being. A number of factors such as: public involvement; social and cultural; housing and the built environment; transport and connectivity; economy; and local services are all determinants of health. The HIA is a technical document and demonstrates how public health and wellbeing considerations have been embedded in the process.

Appropriate Assessment

2.17

The Habitats Directive requires that a screening process be carried out to look at potential significant effects on European designated habitat sites that may be caused by policies contained in the Core Strategy, alone or in combination with other plans. The City Council commissioned the Warwickshire Biological Record Centre (Warwickshire County Council) to undertake this process using best practice guidance. The screening process concluded that there would be minimal effect on any European sites that would be affected by the Strategy.

**Coventry Local Development
Plan**

Section 3

Policy Context

Core Strategy Submission Draft

National Planning Policy

3.1

The 2004 Act and associated regulations have been substantially amended by the 2011 Localism Act. The draft National Planning Policy Framework also puts forward a number of important changes with implications for the development planning system. One of these impacts is the proposed presumption in favour of sustainable development where a development plan is silent or indeterminate. It is therefore important that local planning authorities have a development plan in place.

Regional Planning Policy

3.2

The 2011 Act deletes the Regional (Spatial) Strategy from the development plan. Until it is formally abolished, the West Midlands R(S)S (2008) and draft R(S)S (2009) remain as part of the development plan. The Court of Appeal has established that it is unlawful for a Council to take the forthcoming abolition of R(S)S into account in policy making.

3.3

The regional plan (West Midlands Regional Spatial Strategy (RSS)) was approved in 2004 and a partial review was then undertaken at the request of the Secretary of State. Phase One, which covers the Black Country, was completed and incorporated into the RSS in 2008. Phase Two was launched in November 2005 and covered housing, town centres, employment land, transport, sustainability and waste. The Phase 2 was submitted to the Secretary of State in December 2007, and proposed to focus development in the Major Urban Areas, including Coventry, and stated that the region should accommodate 365,600 net additional households between 2006 and 2026.

3.4

Following submission of the Phase 2, the Government expressed concern about the housing proposals in light of the wish to increase housing building rates across the country. It asked the Government Office for the West Midlands (as was) to commission further work to look at options which could deliver higher housing numbers and proposed the extension of the consultation period.

3.5

This work was completed in October 2008, the consultation period having been extended to December 2008 to allow sufficient time to fully understand the proposals. It took the level of housing provision in the Phase 2 as its starting point and presented three potential scenarios for additional growth for the region, totalling between 417,100 and 445,600 additional homes up to 2026.

3.6

The Phase 2 and the Government-commissioned study were considered by an independent panel in April 2009.

3.7

Phase Three was launched in November 2007, considered rural services, culture/recreational provision, regionally significant environmental issues (notably minerals)

and the provision of a framework for Gypsy and Traveller sites. It never reached a formal stage.

3.8

Other regional strategies included:

- Regional Economic Strategy, setting out the Region's approach to closing the wealth gap between it and the South-East;
- Regional Cultural Strategy, representing shared commitment between the region's key cultural and development organisations towards cultural excellence and development in the Region;
- Regional Energy Strategy, setting out how the Region can contribute towards the development of renewable energy and energy efficiency;
- Regional Housing Strategy, influencing future housing provision and addressing a variety of housing needs;
- Regional Sustainable Development Strategy, helping policy-makers incorporate sustainability principles into strategies, plans and projects;
- Regional Transport Delivery Plan, considering changes to the transport network to support the Regional Spatial Strategy; and
- Regional Waste Planning Strategy, reviewing facilities in the Region and setting targets for waste recycling and recovery.

3.9

The regional plan provided a clear sequential approach to land release for both employment and housing land. The Phase 2 plan set targets for growth of the City Centre for both shopping (minimum of 150,000m²) and office development (minimum of 250,000m²). It said that Coventry should provide for a net increase of 33,500 dwellings between 2006 and 2026 and should also maintain a 5-year rolling supply of at least 82 hectares of land for new employment development. It also noted that some of this allocation for housing should be made adjacent to the city within the administrative areas of Nuneaton/Bedworth and Warwick Councils, but these neighbouring local planning authorities no longer support this approach and are preparing their own core strategies that do not make that provision.

Duty To Co-Operate

3.10

The Localism Act introduced a new "duty to co-operate", which means that Councils and others will have to work together and not on their own in isolation. It is not yet clear what, when, or how this can be demonstrated, and regulations are promised to do this.

3.11

Coventry City Council is in a number of different groupings, and will need to show how it has positively co-operated with each. The matrix below sets out the relationships between the Council and each of the primary and secondary partner organisations.

	Districts	Strategic Authorities	LEPs
Primary Relationship	Warwick, Nuneaton & Bedworth, Rugby, North Warwickshire	Solihull, Warwickshire County	Coventry & Warwickshire

Secondary Relationship	Stratford	Birmingham	Greater Birmingham & Solihull
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Sustainable Community Strategy

3.12

The Sustainable Community Strategy ('Coventry – the next 20 years') was approved in 2011. It sets out the overall strategic direction and long-term vision for the economic, social and environmental well-being of the City. It provides a focus to inform the development of a range of strategies and plans by a variety of organisations in order to achieve the agreed strategic long-term outcomes for the City.

3.13

Other relevant local strategies include:

- Air Quality Action Plan
- Building Schools for the Future (BSF)
- Community Cohesion Strategy
- Community Safety Strategy
- Coventry Climate Change Strategy
- Coventry Cultural Strategy
- Coventry Employment Strategy
- Coventry Green Space Strategy
- Coventry Healthy Weight Strategy
- Coventry Housing Statement
- Coventry Joint Strategic Needs Assessment
- Coventry Sport and Physical Activity Facility Strategy
- Coventry Transport Programme
- Economic Development Strategy
- Health Inequalities Strategy for Coventry
- Local Enterprise Growth Initiative (LEGI)
- Neighbourhood Plans
- Neighbourhood Renewal Fund (NRF)
- NHS Coventry Strategic Plan
- Play Strategy
- Older People's Housing Strategy
- Zone Implementation Plan (ZIP)

3.14

The Council has commissioned an independent study to work out how many new homes Coventry will need between 2011 and 2028. This study concluded that a reasonable target is 11,373. The 2011 SHLAA showed that Coventry had enough land available to fit approximately 15,000 homes on it.

3.15

We then worked out how many new jobs will be needed to support that amount of new housing, as a minimum, and then calculated how much land would be needed to accommodate those new jobs. The study concluded that around 100 hectares (247 acres) will be needed to be developed for employment use as a result. The 2011 Monitoring Report showed that 112 hectares (281 acres) of land was available for development to provide new jobs. This means that there is currently not a need to identify new employment land to meet the rest of the city's needs. The supply of

employment land will be monitored, and in the event that the supply runs short it will be replenished through a separate site allocations document.

The Future Growth of the City

3.16

The Core Strategy sets out a jobs-led growth strategy for Coventry. This means that it has identified how many homes will be needed during the plan period, how many jobs will be needed to service those new homes as well as economic changes. If new jobs are created at a faster rate, then we can expect the demand for new homes to increase as well. The Council will monitor development rates on an annual basis, and will review the plan if the rate of development starts to outstrip the supply of available land. It will set out a sequence for land to be developed, with previously-developed land being built on first. A separate site allocations document will identify specific land for new homes and jobs.

3.17

The challenge is how to capture the benefits of growth, whilst minimising or eliminating the potential disadvantages. In addition to attracting new development, strategies for the future need to seek an improvement in the quality, in its widest sense, of job offers, range of housing and public transport, as well as providing safe and attractive spaces and buildings accessible to all, and strengthening existing communities.

**Coventry Local Development
Plan**

Section 4

Strategic Vision and Objectives

Core Strategy Submission Draft

Section 4 Strategic Vision and Objectives

Vision

4.1

The Council's Vision is
"Coventry –

Proud to be a city that works

- *for jobs and growth*
- *for better pavements, streets and roads*
- *to support and celebrate our young people*
- *to protect our most vulnerable residents*

We're proud to do this by

- *being honest, fair and transparent when we make decisions*
- *working with residents, communities and partners to get things done*
- *celebrating all that's good about our city and its future."*

4.2

The preparation of the Core Strategy was begun through a conference held with the Coventry Partnership in January 2006 which aimed to establish the vision and objectives for the Core Strategy. A draft statement reflecting the consensus at the conference was available for city-wide consultation in May and June 2006. Thus, the following has been set out as the Vision for the Core Strategy.

"A premier city at the leading edge of sustainability, design, equality and diversity which

- *is proud of its image and heritage*
- *is at the heart of its sub-region*
- *is accessible and well connected, within and beyond the City*
- *is prosperous, with a growing economy*
- *has a diverse and thriving city centre*
- *consists of sustainable communities and local centres, which are vibrant, healthy and safe,*

– allows people of all ages, backgrounds and circumstances to have access to a range of high quality services, amenities, jobs and a mix of housing types, and

– has an attractive, easy-to-use, well-designed and maintained built and green environment."

4.3

The Coventry and Warwickshire Local Enterprise Partnership (CWLEP) Vision is "To make our area (Coventry and Warwickshire) a World Class economy in which to do business; a place to: lead a great life, excel at learning, visit and return to - all supported by exceptional private, public and voluntary services."

4.4

It is currently progressing the Coventry Gateway proposal (which was the proposed Enterprise Zone around the airport) on the edge of the city in neighbouring Warwick District.

4.5

The Coventry Partnership has adopted a similar vision to that of the Council referred to in paragraph 4.1, and the Sustainable Community Strategy "Coventry: the Next Twenty Years" sets out to deliver that vision.

4.6

The Coventry Local Development Plan plays a particular part in achieving the Sustainable Community Strategy. Nine long term outcomes are set out in the Sustainable Communities Strategy, as follows.

1. A prosperous Coventry with a good choice of jobs and business opportunities for all the city's residents – our plans

– The recovery of the City's economy will accelerate and there will be a more diverse range of businesses and jobs, offering a choice of types and levels of work and working patterns to meet the

aspirations and potential of all Coventry's residents.

- We will provide easy access to the jobs already available

– Local people will benefit from economic growth of the City – they will be supported to develop the skills needed to access jobs, to progress to higher-skilled jobs and to increase their household income.

– We will focus on the city centre as a showcase for the whole city. As a result the city centre will grow and will be a vibrant place to visit, live, work and for business to locate within.

2. People in Coventry living longer, healthier, independent lives – our plans

– We will improve the health and wellbeing of people in Coventry, who will enjoy healthier lives which will contribute towards them living longer in the future and being able to lead independent lives.

– There will be reduced health inequalities between communities.

3. A safer and more confident Coventry – our plans

– People will feel safer and more confident as there is less crime and anti-social behaviour.

– There will be less harm caused by illegal drugs and alcohol.

– Neighbourhoods will experience less environmental crime including graffiti, abandoned vehicles and fly-tipping.

4. Making Coventry's streets, neighbourhoods, parks and open spaces attractive and enjoyable places to be and tackling climate change – our plans

- We will stop the Green Belt being used for housing estates

- We will use the land required for new homes efficiently

- We will bring brownfield land back into use

- We will encourage regeneration and support sustainable development

– Coventry people will see their streets, neighbourhoods, parks and open spaces as more attractive and enjoyable places to be.

– Coventry's carbon footprint will have reduced.

– Coventry will be making more sustainable use of natural resources

– less energy and water will be used, less waste and pollution will be produced, more waste will be recycled.

– Coventry will be better prepared for the impacts of climate change.

5. We will work to improve Coventry children and young people's education, health and wellbeing, protect them from harm, tackle inequality and support their families – our plans

– All children in early years will have the foundation for happy, healthy and successful lives.

– Standards and choice of learning will have improved and more children will have realised their full potential.

– Children and young people's achievements and aspirations will have been fulfilled to the benefit of themselves, their communities and neighbourhoods.

– All young people's aspirations will have been raised and their career and employability prospects will have

improved.

– Children and young people will be making a greater positive contribution.

– Children and young people will have supportive families, friends and communities.

– Children, young people and their families will have access to universal services and support delivered locally through extended schools, children's centres and community settings.

– There will be greater participation of families, children and young people in the design of services and development of local strategies.

6. A good choice of housing to meet the needs and aspirations of the people of Coventry – our plans

– Housing in Coventry will be more suited to people's needs and aspirations with a better mix of the type and tenure of housing in neighbourhoods.

– The quality of the existing housing stock in Coventry will improve and it will be more energy efficient.

– All new build housing stock will be carbon neutral.

– New housing developments will be 'climate-proofed' – contributing towards reducing the carbon foot-print of the City and adapted to cope with the ill-effects of climate change.

7. Making places and services easily accessible for Coventry people – our plans

- We will support local shopping centres, health provision and other services

– The need for travel will reduce as developments for learning and leisure, health services and shops and

employment are positioned in convenient places.

- We will improve roads and public transport on key routes into the city.

– The quality of Coventry's local public transport services will further improve and people will be more likely to travel in ways that are less damaging to the environment.

8. A creative, active and vibrant Coventry – our plans

– Coventry will have a strong, positive image and will be seen as a more attractive vibrant and creative city where people want to visit, live, work, learn and do business.

– Coventry will offer distinctive and high quality cultural activities and enjoy a reputation for this.

– Local people will be proud of the City's cultural activities.

– The City will gain economic benefit from its cultural industry.

– More Coventry people from all communities will be participating and enjoying cultural, leisure and sporting activities.

9. A more equal Coventry with cohesive communities and neighbourhoods – our plans

– Coventry will be a more inclusive and cohesive city and people will feel able to influence the quality of services and be involved.

– There will be more equal opportunities for people from different backgrounds in Coventry.

– People will have seen improvements to quality of life happen most quickly in priority neighbourhoods and communities.

Objectives of Core Strategy

4.7

These outcomes of the Sustainable Community Strategy closely relate to the objectives of the Core Strategy and have driven policy development.

Table 1: How the Core Strategy delivers the themes of the Sustainable Community Strategy

Theme	Core Strategy Objectives
<p>1. A prosperous Coventry with a good choice of jobs and business opportunities for all City's residents</p>	<ul style="list-style-type: none"> • To achieve full employment in the City • To build an enterprise society in which small firms thrive • To stimulate and support a diverse, productive, innovative and knowledge-based economy; • To help create the conditions for growth of businesses through investment and development • To make the City a magnet for business and leisure visitors • To achieve a city centre performing a sub-regional role. • To build on the contribution of the two universities • Delivered by Policies
<p>2. People of Coventry living longer, healthier independent lives</p>	<ul style="list-style-type: none"> • To create an environment that will help people make healthy choices including taking more physical activity • To make it more pleasant to walk, cycle and play outdoors • To enable appropriate services to be accessible so that they are available to users and deliver care when needed • To provide better quality housing • Delivered by Policies
<p>3. A safer and more confident Coventry</p>	<ul style="list-style-type: none"> • To design out crime in new developments • To involve communities in improving the quality of the local environment • Delivered by Policies
<p>4. Making Coventry's streets, neighbourhoods, parks and open spaces attractive and enjoyable places to be and tackling climate change</p>	<ul style="list-style-type: none"> • To achieve a significant improvement in the quality of design, maintenance and accessibility of buildings and spaces in all parts of the City in order to provide a clean, sustainable and attractive built, historic and green environment. • To seek to avoid and minimise the impacts of climate change • To create a sustainable city, attractive now and in the future, by ensuring developments are planned to be:

Table 1: How the Core Strategy delivers the themes of the Sustainable Community Strategy

Theme	Core Strategy Objectives
	<p>located so as to reduce the need to travel by car; built to last and adaptable to change: are resource-efficient in their construction and encourage sustainable use of resources by their users.</p> <ul style="list-style-type: none"> • Delivered by Policies
<p>5. We will work to improve Coventry children and young people's education, health and wellbeing, protect them from harm, tackle inequality and support their families</p>	<ul style="list-style-type: none"> • To meet educational needs where necessary and to provide facilities to children to socialise, play and take part in sport and physical activity. • To support the City's further and higher education establishments. • Delivered by Policy
<p>6. A good choice of housing to meet the needs and the aspirations of the people of Coventry</p>	<ul style="list-style-type: none"> • To provide a diverse range of quality housing in sustainable, mixed communities, catering for the needs and aspirations of current and potential residents within a growing city. • Delivered by Policies.
<p>7. Making places and services easily accessible for Coventry people</p>	<ul style="list-style-type: none"> • To create a walkable city with lively, safe, attractive and efficient routes for pedestrians of all ages and abilities • To develop streets and roads which are people-friendly, appropriate to their location, and easy for vehicles to use without adversely affecting the quality of neighbourhoods. • To provide a transport network that gives the city better levels of accessibility, efficiency, safety and sustainability. • To develop a high quality public transport system throughout the city that is efficient, affordable and based on people's travel patterns. • To provide better connections between the city and the sub-region

Table 1: How the Core Strategy delivers the themes of the Sustainable Community Strategy

Theme	Core Strategy Objectives
	<ul style="list-style-type: none"> • To provide better links with the city centre • To provide better connections to green spaces within the city. • Delivered by Policies
8. A creative, active and vibrant Coventry	<ul style="list-style-type: none"> • To support the provision of communal, cultural, leisure and sporting activities • To support a diverse range of activities in an expanding city centre for all age-groups • Delivered by Policies
9. A more equal Coventry with cohesive communities and neighbourhoods	<ul style="list-style-type: none"> • To seek to reduce inequality between the environments of deprived neighbourhoods and the rest of the city, by ensuring that all neighbourhoods have good quality and safe environments. • To invest in local neighbourhoods and communities, reducing inequalities between different parts of the city by ensuring equitable access to services near to where people live. • Delivered by Policies

**Coventry Local Development
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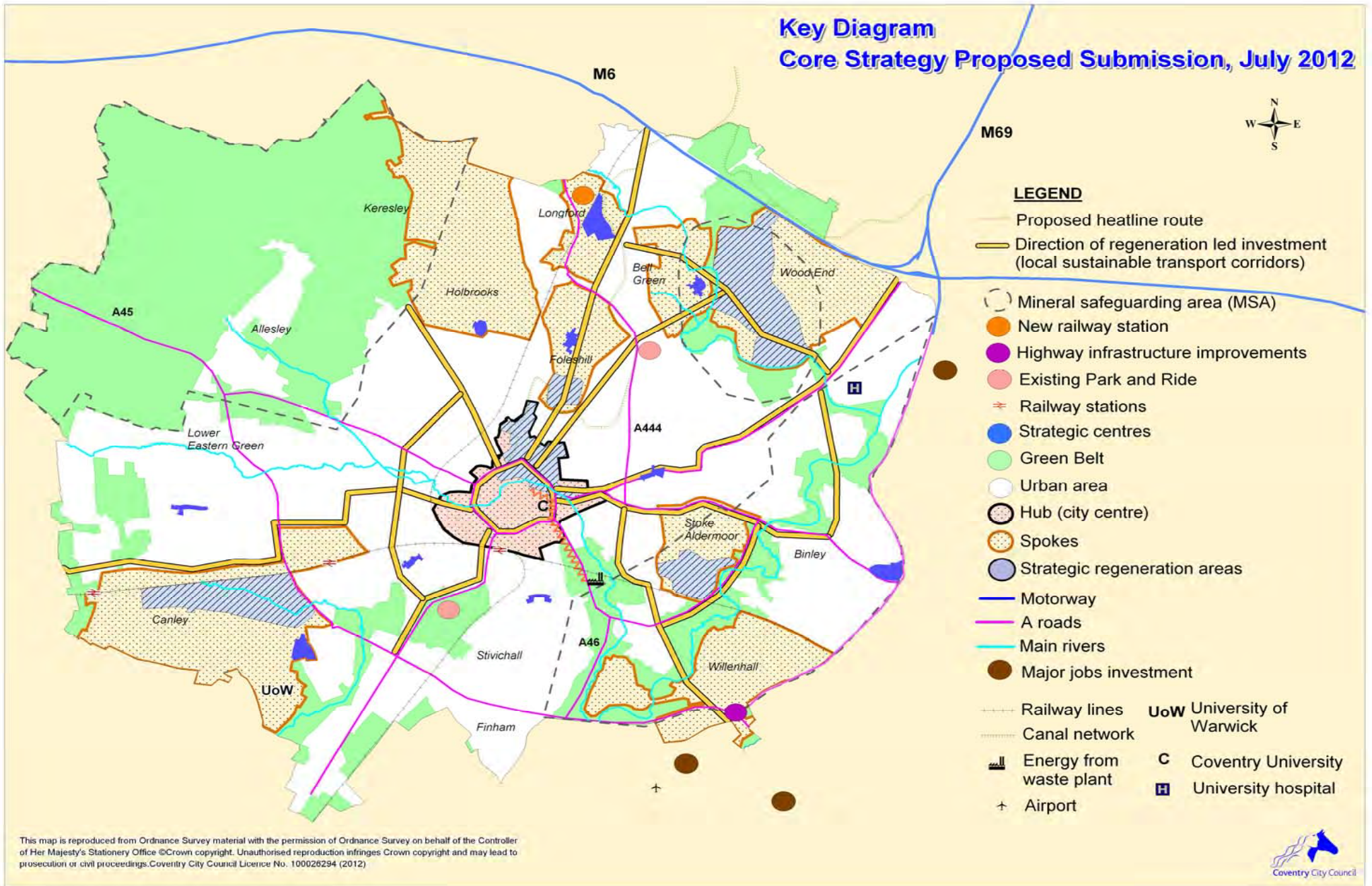
Section 5

Overall Strategy

Core Strategy Submission Draft

Map 2 Key Diagram

Key Diagram Core Strategy Proposed Submission, July 2012



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5.1

This chapter presents the medium-long term planning strategy for the city. It shows how the Vision and Objectives set out earlier will be achieved by guiding how, where and when change will take place in order to meet sustainable development needs.

5.2

The city is an area where the potential for expansion is constrained by tight Green Belt boundaries. There is a need to provide for the housing, leisure, shopping and development needs of a growing city. The Council faces a challenge in identifying the most sustainable way of planning for the future of the city. These characteristics constrained the options that could be considered and in reality the strategy is a combination of those options.

5.3

It is recognised that growth needs to come from attracting jobs and investment to be successful. Equally, it needs to provide local people with the quality of life they expect and deserve. The policies in the following chapters aim to provide a quality city that people wish to live in and invest in consistent with the Coventry Sustainable Community Strategy.

5.4

Based on current population projections and a net growth of 11,373 new additional homes, Coventry's total population in 2028 is expected to be approximately 334,500. This compares with approximately 306,000 in 2006.

Policy OS1 Hub and Spokes

All new developments in the hub and spokes will incorporate the following sustainable principles:

- Increased health wellbeing and quality of life
- access to a variety of high quality green and blue spaces;
- access to job opportunities;
- low carbon housing that meets the required Code for Sustainable Homes;
- use of low carbon, renewable and energy efficient technologies;
- the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities
- increased health, wellbeing and quality of life;
- measures to adapt to the impacts of climate change;
- access to sustainable modes of transport; and
- sustainable waste management.

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Core Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless

material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise taking into account:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Explanation

5.5

A central hub together with a targeted number of spoke areas will be focused on areas that have previously been developed. These areas also encompass existing strategic regeneration areas and are identified on the key diagram. They will be integrated within the existing character of localities and supported by a full range of services and infrastructure. It is intended that these areas will be the focus for the continued expansion of the Coventry jobs market with an emphasis on providing suitable land for continued investment throughout the plan period.

5.6

They will also use the latest sustainable practices in construction and design to reduce Coventry's carbon footprint in line with the 2012 Climate Change Strategy. They will also include measures to adapt to the effects of climate change and will act as exemplars in terms of sustainable standards for the rest of the city.

5.7

High quality, pleasant and safe family neighbourhoods will be created with a range of green space providing a high quality residential environment for all residents. They will be inclusive for all, creating mixed, sustainable communities with a variety of affordable housing types, sizes and tenures.

5.8

Sustainable waste management will be encouraged from the start of any development through sustainable demolition and construction techniques and the recycling of building waste. Neighbourhoods will benefit from increased recycling provision and the potential to utilise waste as a resource for energy recovery as modern waste management facilities are developed in Coventry.

5.9

Access to viable choices of quality sustainable transport supported by interactive digital information technology and pedestrian friendly walking environments will

encourage reduced car usage. These areas will also include a full range of services including health care and schools which are easily accessible.

Evidence

- Coventry's Climate Change Strategy, 2012
- Delivering a More Sustainable City Supplementary Planning Document, 2009
- Evidence base to support planning policies relating to sustainable buildings and low carbon/renewable energy, (CCC) 2012.
- Proposed Core Strategy Issues and Options, 2011

Delivering A Jobs - Led Strategy

5.10

The strategy is based on the principles of sustainability – using land effectively and efficiently. This means not wasting land (for example, by allowing it to become derelict), providing easy movement and ensuring that employment, education and leisure opportunities are within easy reach of everyone. The strategy must however also deliver an attractive city, improving its quality and the way it functions, so that it is a place where people wish to live, work and invest in.

5.11

The focus for development will be an enlarged City Centre, at the heart of the existing built-up area of the City, providing jobs, as well as housing sites. New growth will be planned to provide the most sustainable patterns of development, as well as opportunities to enhance the environment. Across the city, this will involve the delivery of high-quality buildings and places, based on an understanding of the local context, both visual and functional, and addressing social and sustainability issues. In addition, the City needs to play its part in minimising climate change. This will be achieved by:

- protecting and adapting existing buildings, as much as possible;
- encouraging sustainable methods of construction and measures to minimise energy use in new developments, preserving natural resources where possible; and
- locating built development so that it is accessible to key facilities and services, minimising the need to travel by private car.

5.12

Priority will be given to re-using previously developed land and existing buildings, providing they are accessible and relate well to neighbouring development and existing communities.

5.13

Coventry city centre is currently the focus of jobs, shops, civic functions, business, transport connections, many social and cultural facilities, education opportunities and residential accommodation. A key theme of the Core Strategy – and the local development framework as a whole – is to enhance this role and make the city centre better placed to serve as the focus of the Coventry and Warwickshire sub-region. As a result of the scale of growth anticipated, and recognising the scale of change that has already started, the boundaries of the city centre are to be extended to the north, east and west, resulting in an enlarged, but still walkable, central area.

5.14

One of the key aims of the Core Strategy is to ensure that growth is led by employment, rather than by housing, in order to avoid creating an unsustainable dormitory city.

5.15

Coventry's employment land study suggests that the city should provide a 30 ha five-year rolling reservoir of readily available employment land at all times.

5.16

About half of all new jobs are expected to come from office development in the city centre. Further employment provision is expected to result from the growth of the University of Warwick and Coventry University, and the University Hospital, thus providing a focus on health and education. The remaining employment requirement is expected to be provided for in other sectors, including traditional manufacturing uses. However the main thrust of growth is expected to be through offices and research and development.

5.17

The city is home to a number of important companies' headquarters. The Core Strategy aims to retain such headquarters, as well as identified strategic employment sites, as they are crucial to the city's economic structure. These sites will not be released for alternative uses. It is also recognised that, over the next 20 years, long established factories will come to the end of their economic life and will come forward for redevelopment. Those that are well located to the highway network and accessible to the community by public transport will be recycled to replenish the supply of readily available employment land. However, it is acknowledged that some mixed use with an element of residential or other higher value enabling use/s may be justified to bring forward this churn process in a reasonable timescale.

5.18

The city has two distinctive types of Green Belt: the open countryside of Ancient Arden, on its western boundary, and green wedges, which are extensive and continuous corridors of open land that run through the built-up area of the city. It is expected that there will be pressure for development within parts of the Coventry Green Belt, especially in the later years of the plan period.

5.19

The 2011 Strategic Housing Land Availability Assessment (SHLAA) has indicated that the existing built-up area of the City can accommodate a net increase of approximately 15,000 dwellings, principally on brownfield sites. New housing developments will be directed to sustainable locations within the built-up area to assist regeneration and utilise existing infrastructure. This means that further land may need to be identified to accommodate new homes within the plan period and suitable sites will be identified by a Site Allocations DPD in due course.

5.20

The regeneration of priority areas within Coventry will continue to be a priority over the next 20 years. Significant amounts of future housing growth are located in these areas. They are spread across the City but are generally located in the identified 'spoke' areas. There are already a number of Strategic Regeneration Areas beginning to make progress through the planning system in Wood End Henley Green

and Manor Farm, Swanswell, Canley, Foleshill and Stoke Aldermoor. The release of greenfield land would undermine the regeneration of these areas.

Improving Environmental Quality

5.21

A good quality environment is essential to achieve sustainable growth. The Council aims to improve existing provision and meet future needs, so that people see their neighbourhoods as more attractive and enjoyable places to be. Achieving a high quality environment is a pre-requisite to growth and contributes to the economic life of the city as an essential part of any successful regeneration strategy.

5.22

The Core Strategy requires a high standard of urban design to assist in the creation of sustainable and inclusive communities. It seeks to protect our heritage and acknowledges that well-connected green infrastructure has the potential to make Coventry a much more attractive and prosperous city, as well as a healthier place to live and work. The provision of a city-wide network of high quality, well-managed and well-connected, multi-functional green spaces, will deliver a wide range of benefits to those living in, working in and visiting the city, as well as improving the attractiveness of the city as a whole.

Creating an Accessible City

5.23

Improvements to transport networks and infrastructure will be provided in order to move people and goods to and within the city. The best use will be made of existing network capacity, by locating development close to existing infrastructure so as to reduce the need to travel by car. This will coincide with maximising opportunities for travel by public transport, cycling and walking, and by reducing dependence on cars. Public transport will be enhanced, accompanied by targeted improvements, where needed, in order to address existing deficiencies and/or to accommodate growth.

Achieving Sustainable Communities and a Sense of Place

5.24

The city's suburbs are the home of the majority of its existing population. Thus, the strategy seeks to improve existing local neighbourhoods and reduce the inequalities between them, through measures such as:

- housing renewal and development,
- improving the environment,
- provision of suitable health and community facilities and
- better transport provision, linked to employment and training opportunities.

5.25

Coventry has a clearly defined hierarchy of centres that support the areas they serve. These centres have an important role, providing shop services and other facilities that are often accessible on foot. The additional population growth likely to be experienced in Coventry will have some implications for these different centres. However, their role will be generally confirmed and strengthened as centres of local

neighbourhoods, with the ability to provide accessible local jobs, services and facilities.

5.26

The centres will be enhanced, maintained and protected. Shops and some office and leisure development will continue to be directed to centres of appropriate scale, but only providing that appropriate investment is not redirected from the city centre. Development will only be allowed outside these identified centres if gaps in provision are demonstrated that cannot be satisfactorily addressed by enhancement of existing centres. Studies have indicated that there is an existing hierarchy of centres that provides an appropriate and geographically spread level of provision.

Implementation

5.27

The provision of community infrastructure and facilities helps to build communities that maximise the quality of life and opportunities for a growing population. In preparing the Core Strategy, work has focussed on its deliverability through the development of an understanding of the infrastructure required to support new development and the potential source of funding.

5.28

New development therefore will be expected to contribute to any additional infrastructure needs it generates with the level of contribution determined by the type and scale of development. The Council will be adopting a Community Infrastructure Levy (CIL).

5.29

Local authorities are now empowered to charge CIL on new developments to help finance the infrastructure needed to support growth. Local authorities are encouraged to continue to advance their infrastructure planning in order to ensure that there is clear evidence about planned infrastructure, its cost, timing and other likely sources of funding to underpin their development strategies. The use of agreements and undertakings made under section 106 of the Town and Country Planning Act 1990 (as amended) (Planning Obligations) is also still an option to the Council and can be used to achieve the same result.

**Coventry Local Development
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Section 6

Environmental Management

Core Strategy Submission Draft

Background

6.1

Climate change and its potential impact on the urban and natural environment is recognised as one of the most significant challenges facing Coventry. It is essential that the way in which Coventry develops over the plan period and beyond is set within the context of mitigating the impacts of climate change and adapting to the effects on the local environment.

6.2

The key components of how Coventry can develop a more sustainable future include the following policy areas:

- Planning for Climate Change;
- Water Quality and Flood Risk;
- Air Quality; and
- Minerals and Waste.

6.3

These policy approaches set out what needs to be considered in the Coventry context. Coventry's 2012 Climate Change Strategy sets out several objectives that will aim to reduce carbon emissions. Objective 1 directly relates to how all future development in the city must contribute to achieving this objective, which states:

"to have a joint programme, working with other organisations in the city, to reduce carbon dioxide emissions by 27.5% (based N186 2005 data) by 2020. The 27.5% target is based upon a 2005 baseline and is equivalent to the national carbon dioxide emissions target of 34% by 2020 which has a 1990 baseline leading to the difference in percentages".

Existing Guidance

National Policy Guidance

National Planning Policy Framework (2012)

Relevant Evidence Base

- Allowable Solutions for Tomorrow's Homes (Zero Carbon Hub, 2011)
- ARUP Citiwater SUD modelling report, 2011
- BREEAM New Construction 2011 (BRE, 2011)
- Canley Climate Change Feasibility Study - costs associated with building to CSH Levels 3 and 4. (Faber Maunsell/AECOM 2009)
- Code for Sustainable Homes - A Cost Review (CLG, 2010)
- Cost of Building to the Code for Sustainable Homes. Updated Cost Review (CLG, 2011)
- Coventry Canal Conservation Area, (CCC), 2012
- Coventry City Council Air Quality Management Plan, 2007
- Coventry City Council Low Carbon Energy Study (report produced for CC/AWM/Coventry University/Warwick University by AECOM in 2010)
- Coventry City Council Low Carbon Energy Study (report produced for CCC/AWM/Coventry University/Warwick University by AECOM in 2010)
- Coventry Local Climate Impacts Profile
- Coventry Municipal Waste Management Strategy, 2008-2020.
- Coventry University, SUDs Technical Feasibility Report, 2012

- Definition of Zero Carbon Homes and Buildings (CLG, 2008)
- Delivering a More Sustainable City Supplementary Planning Document, 2009
- Draft Surface Water Management Plan Risk Assessment, Coventry City Council, 2012
- Environment agency: Flooding in England: A national assessment of flood risk
- Evidence base to support planning policies relating to sustainable buildings and low carbon/renewable energy, (CCC) 2012.
- Future Water. The Government's water strategy for England (HM Government, 2008)
- Guide for Mineral Safeguarding in England' produced by the British Geological Survey (BGS), 2007
- Health Effects of Climate Change in the West Midlands Summary Report (DEFRA et al)
- Heat Mapping and Decentralised Energy Feasibility Study (report produced for AWM by Halcrow in 2008; covers West Midlands Region)
- Historical Floods in Coventry 1910-2009, (Coventry University), July 2010
- Local Climate Impacts Profile (Coventry City Council, 2010)
- Local Flood Risk Assessments
- Outline Carbon Reduction Opportunities Assessment for Coventry City & University (report produced for AWM/The Carbon Trust, 2009)
- Policy EM6 Green and Blue Infrastructure
- Preliminary Flood Risk Assessment, Coventry City Council, July 2011
- Putting a Price on Sustainability (BRE/Cyril Sweet, 2008).
- Regional Vulnerability Assessment of Biodiversity Assets to Climate Change (West Midlands Climate Change Adaptation Partnership, March 2010)
- Renewable and Low Carbon Energy Resource Assessment and Feasibility Study, Camco, 2010
- Renewable Energy Capacity Study for the West Midlands (SQW et al 2011).
- Revisions to the Code for Sustainable Homes - Impact Assessment (CLG, 2010).
- Severn Trent Water AD08 Project, Growth Point: Coventry (Report no.: B06019X5/Cov-02) (JE Jacobs, 2008)
- Strategic Flood Risk Assessment Report, (Halcrow, 2008)
- Sub-regional Green Infrastructure Study, (Land Use Consultants), 2011
- Water Act 2003 (part 3, sections 81 & 83)
- WEHM Biomass Study for Aldermans Green Industrial Estate - Feasibility Study for Coventry City Council (AECOM, 2010)
- WEHM District Heating and CHP Feasibility Study (Faber Maunsell/AECOM, 2009)
- West Midlands Climate Change Partnership Climate Change Adaptation and Resilience Study Summary Report (Halcrow, July 2010).
- West Midlands Low Emissions Towns and Cities Programme, 2012

Planning for Climate Change

Policy EM1: Building Sustainability Standards

All new **residential** development will be required, as a minimum, to meet Code for Sustainable Homes level 4 from the date of adoption of this plan and Code level 5 from April 2016, or any future national equivalent unless it can be clearly demonstrated that it is financially unviable.

All new **non-residential** development over 1,000 square metres gross floorspace to meet BREEAM 'Excellent' in the hub area and at least BREEAM 'Very Good' in the spoke areas and other areas of the city or any future national equivalent, unless it can be clearly demonstrated that it is financially unviable.

Where it can be shown that a proposed development is unable to meet these standards, the applicant will be required to make provision for compensatory measures elsewhere in the city. The mechanism for achieving this will be set out in the Community Infrastructure Levy charging schedule.

6.4

The evidence identified in the Council's supporting evidence base as it relates to climate change shows the city needs policies to ensure that all development mitigates and adapts to climate change. The Council also intends to take a leading role in identifying new and existing opportunities for Decentralised Energy Networks (or DENs for short) through heat and energy recovery.

6.5

The construction methods and standards of all buildings can help reduce local climatic effects and ensure better adaptability to changing circumstances. The Government has identified this issue as a priority through the National Planning Policy Framework (Para's 93-95).

6.6

The Government's Code for Sustainable Homes is the preferred system for measuring the sustainability of new homes. The Code has six levels with mandatory requirements at each level ranging from energy and water usage, materials, surface water run-off and waste. It also covers the categories of pollution, health and well-being, management and ecology. The attainment of higher Code levels requires the incorporation of renewable energy production and implies a move towards higher density development. The Government intends to bring in the Code's energy standards through stepped changes to the Building Regulations. This expressly involves the achievement of level 3 from 2010, level 4 from 2013 and level 6, zero carbon, from 2016.

6.7

Currently, there is not a non-domestic equivalent of the Code but the Building Research Establishment Environmental Assessment Method (BREEAM) is a voluntary assessment scheme that covers areas ranging from management, health and well-being, energy, transport, water, materials and waste, land use and ecology, and pollution aspects of non-residential building performance. This is the most comprehensive assessment tool available to judge non-residential buildings and its standards range from Pass to Good, Very Good, Excellent and Outstanding.

6.8

Developments that are unable to meet the standards of this policy on-site would be required to make a financial contribution. This would enable the Council to help fund schemes, either new build, retrofit or conversion that would otherwise not be able to meet such standards. The mechanism for achieving this will be examined through the Council's Community Infrastructure Levy Plan charging schedule.

Policy EM2 Reducing Carbon Dioxide Emissions

The Council recognises the Government's targets to reduce national carbon dioxide emissions by 34% against 1990 levels by 2020 in order to meet an 80% reduction by 2050, and will require development to make a significant contribution towards this target.

To achieve this, the Council will require:

Carbon dioxide emissions to be reduced to meet current Building Regulation requirements and any applicable Code for Sustainable Homes or BREEAM standards as described in Policy EM2 (Building Sustainability Standards), in accordance with the following hierarchy:

- i. Reducing energy demand, for example through energy efficient building design and suitable orientation;
- ii. Supplying energy efficiently, for instance from combined heat and power (CHP), or by connecting to a Decentralised Energy Network (DEN) such as a district heating scheme;
- iii. Providing energy from renewable or low carbon energy sources.

The Council will work with partners to promote and develop low carbon Decentralised Energy Networks, with a particular focus on the hub and spoke areas of the city.

All new development and refurbishment projects within the hub and spoke areas of the city will be required to connect to a low carbon DEN, where available, unless there are exceptional circumstances or it can be demonstrated that energy will be supplied from an alternative source with a lower carbon intensity.

In the case of major developments, where such a network is not available, consideration should be given to:

- creating a new low carbon DEN (or extending an existing network to incorporate the development) and/or
- the use of on-site CHP.

As a minimum, all major development within hub and spoke areas will be required to be designed to be able to connect to a future low carbon DEN. When assessing the feasibility of connecting to an existing DEN or creating a new DEN, the assessment should be made on a whole-life cost basis.

An energy statement to demonstrate how the requirements of this policy have been met is required to be submitted with all development proposals. The Council's requirements relating to this policy will be expressly amplified through a Supplementary Planning Document.

The Council will support and where feasible establish a Community Energy Fund to enable the delivery of Allowable Solutions in line with the 2016 Building Regulations.

6.9

The built environment remains the largest single contributor of carbon dioxide at 40% of the city's total with homes and transport having emissions of 36% and 24% respectively. It will be the case that the hub and spoke areas designated on the key diagram will have a major role to play in achieving an increase in the level of decentralised low and zero carbon energy supplies that can be made available.

6.10

Within these defined neighbourhoods, new development, regeneration and refurbishment projects will be expected to take place in the context of more detailed proposals for decentralised low and zero carbon strategic energy infrastructure.

6.11

Any prospective developers investing in the identified hub and spoke areas would be required to work with an energy supplier and other stakeholders to bring forward schemes that can take advantage of any existing and planned decentralised energy network. Developments that would be expected in these areas would offer the economies of scale necessary to include combined heat and power generation or a network connection to an existing energy network. The indicative route of the proposed phase 1 heat line is shown on the key diagram.

Policy EM3 Renewable Energy Generation

Proposals for the installation of renewable and low carbon energy technologies appropriate for Coventry, including both building-integrated and standalone schemes, will be promoted and encouraged, provided that:

- any significant adverse impacts can be adequately mitigated;
- where biofuels are to be utilised, they are obtained from sustainable sources and transportation distances are minimised; and
- any energy centre is suitably located and designed to a high quality such that it is integrated with its surroundings.

6.12

Renewable energy can be supplied at a national level such as large off shore wind farms, solar farms or nuclear power stations, as well as locally and through smaller and on-site renewable energy schemes. Due to the lack of large open areas of space within the city, on-site and neighbourhood-scale renewable energy schemes are the most effective way for Coventry to contribute to renewable energy targets set out by the present government. Any local or on-site applications will therefore be encouraged. If a smaller site generating renewable heat is close to a district heating network, the developer will have the chance to feed any excess energy created into the district heating system.

6.13

Although wind turbines are a good example of a renewable energy source, around 90% of Coventry is unsuitable for wind turbines. Insufficient wind speeds, due to the

density of development, mean Coventry cannot justify the use of wind turbine as an effective renewable energy source. This has been evidenced through a local wind mapping study carried out in 2010.

Policy EM4 Climate Change Adaptation

All new development and refurbishment projects will be required to allow for the expected impacts of climate change throughout the lifetime of the development, through the incorporation of appropriate adaptation measures or by providing sufficient flexibility of design to allow for future adaptation. Such measures include, but are not restricted to:

- Protection and enhancement of existing and/or provision of new green and blue infrastructure, as appropriate as set out in Policy EM5
- Measures to prevent summer overheating and minimise cooling loads, such as appropriate use of thermal mass, provision of summer shading, and use of passive/natural ventilation systems. Where the provision of mechanical cooling and ventilation is unavoidable, low carbon energy sources should be used, unless it can be clearly demonstrated that they are financially unviable.
- Water efficiency measures as set out in Policy EM6
- Flood prevention and mitigation measures, including SUDs, as set out in Policies EM7 and EM8.

All development proposals will be required to demonstrate that future climate risks and opportunities have been adequately considered. Full details of the proposed adaptation measures should be incorporated as an integral part of any submitted development scheme.

6.14

Infrastructure and buildings are the key components of a successful city. As the effects of climate change become more apparent, these important elements of the city will need to be adapted to work in equilibrium with extreme weather conditions. Planning for climate change adaptation therefore should become part of every application, if the city is to continue to develop. Adaptation methods can include, but are not limited to:

- Changing the materials used in developments so they can adapt to extreme weather, for example, using light coloured bricks to reflect solar heat thus cooling buildings.
- Incorporating thermal mass and shading devices into building design in order to prevent overheating.
- Installing sustainable drainage systems such as permeable paving and infiltration devices. These can reduce the risk of flash flooding. Depending on the particular type used, SUDS can also have other potential benefits such as a reduction in water pollution and a decrease in the urban heat island effect.

Policy EM5 Green and Blue Infrastructure

Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing habitats. This must be demonstrated through the creation of new habitats wherever possible to assist with species movement to provide a source of locally grown food through local allotments, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.

New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. Where the opportunity arises, and in line with the city's Green Space Strategy, the Council will expect developments to enhance blue and green infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.

A key element of Coventry's approach to green and blue infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the City where there is an identified deficiency of green and blue space.

Developments should maximise the provision of green roofs and the greening of vertical surfaces as far as reasonably possible and where this can be achieved in a sustainable manner, without excessive additional water demand.

6.15

The term green and blue infrastructure refers to a strategic network of green and blue spaces, such as woodlands, parks, amenity landscaping, ponds, canals and rivers, and the links between them. It provides multiple social, economic and environmental benefits, including:

6.16

In the Coventry context, given that future development is to be largely confined to within the existing city limits, which will result in an increased density of development, protecting, enhancing and increasing green and blue infrastructure is particularly important. The Green Infrastructure Study, carried out on behalf of the Council in 2008, produced a set of Green Infrastructure Standards for sustainable development. Key recommendations are that:

- Green infrastructure should be considered in the same manner as any other form of infrastructure servicing new development, and should be an essential component of all fully serviced development plots.
- New green infrastructure associated with development should connect into site-level networks which should in turn connect into the city-wide network.
- All developments should include, wherever possible, green infrastructure elements, including SUDs, urban trees and green roofs, which deliver multiple sustainable benefits to the urban environment through their natural processes.

Policy EM6 Water Efficiency

All developments, including applicable refurbishment schemes, are required to incorporate appropriate water efficiency measures.

As a minimum, the following standards are to be achieved:

- For dwellings, the maximum design internal potable water use should be 105 litres per head per day;
- For non-dwellings: BREEAM 'Good' water consumption standards (or any future national equivalent) should be met.

These requirements apply irrespective of whether Policy EM1 (Building Sustainability Standards) is relevant for a particular development. Rainwater harvesting and grey water recycling will be encouraged and supported.

6.17

Having previously declared a number of drought zones in the south and east of the country, in April 2012 the Environment Agency confirmed a further 17 zones, encompassing much of the South West and Midlands and including Warwickshire and the West Midlands. The decision to declare drought was taken after the driest year on record in 2011, a second winter of below-average rainfall and only just over 40% of expected rainfall in February and March. This led to low groundwater levels and exceptionally low river levels across the region. The lack of rain impacted on the environment and farmers, causing problems for wildlife, wetlands and crop production.

6.18

Results of climate change modelling indicate that droughts will occur more frequently in the future, and this combined with a trend of increasing consumption. National per capita consumption has risen by 10L/day since 1992, to 150L/day. This is acknowledged by the Government in its water strategy for England, 'Future Water', which outlines a vision for the sustainable delivery of secure water supplies and an improved and protected water environment. A key objective of the strategy is to reduce per capita consumption to 130L/day by 2030 through the implementation of demand reduction measures.

6.19

The Code for Sustainable Homes is an important driver of water efficiency in new dwellings, awarding credits on the basis of indoor and outdoor water usage and setting minimum standards according to the overall Code level to be achieved. The level of 105L/head/day is the maximum permissible indoor water consumption needed to achieve Code Levels 3 and 4, 20L/head/day less than current Building Regulations Part G requirements. This standard can be met using basic, low cost water efficiency measures such as dual flush WCs, water efficient appliances, spray taps and low capacity baths. Although minimum required Code ratings are specified in the Building Sustainability Standards policy (EM1), which will ensure that in most instances these water efficiency policy requirements will be met in any event, this standalone policy further reinforces the approach to water efficiency being applicable to all new dwellings regardless of whether the overall Code requirements apply, together with domestic refurbishment schemes.

6.20

In the case of non-dwellings, due to the many different uses to which these types of buildings can be put, it is not possible to set a single maximum consumption figure. Instead, BREEAM methodology, which involves calculating a notional baseline using a dedicated water calculator (known as the BREEAM Wat 01 calculator) and then specifying improvements against the baseline, is used. Minimum BREEAM 'Good' standards for water efficiency require an improvement of 12.5%.

Water Quality and Flood Risk

Policy EM7 Flood Risk Management

Development will be directed to locations with the least risk of flooding and impact on water quality. All major developments sites must be assessed for their contribution to overall flood risk, taking into account climate change predictions.

The Council will require a site-specific flood risk assessment (FRA) to be prepared in support of planning applications for:

- All developments within Flood Zone 1 of 1Ha or greater, together with all developments in Zones 2 and 3, regardless of size, as identified in the Strategic Flood Risk Assessment.
- All developments identified as being at risk from other sources of flooding, including surface water, sewer and groundwater flooding, as identified in the Strategic Flood Risk Assessment and Preliminary Flood Risk Assessment. These areas include:
 - City Centre;
 - Sherbourne Fields;
 - Kingfield Road;
 - Bennetts Road;
 - Hen Lane; and
 - Duggins Lane.

Site-specific FRAs should:

- Identify and assess the risks of all forms of flooding to and from the development, and demonstrate how these flood risks will be managed now and in the future, taking into account climate change; and
- Identify opportunities to mitigate the flood risk to the development, site users and the surrounding area and propose specific measures to address the flood risk identified.

6.21

The River Sherbourne runs through the centre of Coventry and is culverted. The Flood and Water Management Act (FWMA) came into effect in April 2010 and implemented a number of recommendations from the Pitt Review relating to the widespread flooding which occurred throughout the UK in 2007. It clarified the responsibilities for tackling flooding in an area and placed new responsibilities on the Environment Agency, local Councils and developers (among others) to manage the risk of flooding, particularly in relation to surface water flooding. It is important to design and plan developments so that the risk of flooding is reduced from the outset.

6.22

Water quality in the city's rivers and the canal system has been measured on an annual basis. The latest data available from the Environment Agency (2009) is based on four factors:

- I. Chemistry – River Sherbourne, Grade A rating
- II. Biology – River Sherbourne, Grade C rating
- III. Nitrates – River Sherbourne, Grade 4 rating
- IV. Phosphates - River Sherbourne, Grade 4 rating

6.23

The Environment Agency uses a grading system from A (very good) to F (bad). The River Sherbourne is classed as a natural ecosystem for fish and can be used for any type of water abstraction including potable supply.

Policy EM8 Sustainable Drainage Systems (SUDS)

All development should utilise SUDS unless it can be clearly demonstrated there are practical reasons for not doing so and should ensure that surface water runoff is managed as close to its source as possible in line with the following drainage hierarchy:

- I. Store rainwater for later use
- II. Where the local ground conditions allow, use infiltration techniques, such as porous surfaces in non-clay areas
- III. Attenuate rainwater in ponds or open water features for gradual release
- IV. Attenuate rainwater by storing in tanks or sealed water features for gradual release
- V. Discharge rainwater direct to a watercourse
- VI. Discharge rainwater to a surface water drain
- VII. Discharge rainwater to a combined sewer.

The Council will not consider planning applications valid unless rainwater drainage arrangements have been formally approved in advance by the SUDs Approval Body.

6.24

The 2010 Flood and Water Management Act clearly sets out a new lead role for local authorities in managing local flood risk (from surface water, ground water and ordinary watercourses).

6.25

The Act includes the following specific measures that will have a direct bearing on how surface water is managed in Coventry:

- The Council has key responsibility for surface water flooding.
- A new risk-based regime to improve reservoir safety.
- Power to designate structures or features that impact on flood risk.
- Developers will be required to incorporate sustainable drainage systems into new developments.
- The minimum content of a flood risk management strategy.

- Power for risk management authorities (including water companies) to disclose information once they have this information, without waiting to be asked for it. Risk management authorities are under a duty to have regard to local strategies and guidance, reinforcing a duty to co-operate.
- A power for local authorities to require information from any person and to impose a civil sanction if information is not provided.

6.26

The National Planning Policy Framework promotes a sequential test based approach to the location of development. The hub and spokes approach has acknowledged that within these areas of sustainable economic growth and regeneration, due regard and attention has to be given to the sequential test based approach in areas with a lower probability of flooding. Coventry's Strategic Flood Risk Assessment indicates that within the areas identified as hub and spokes, some sites are at a higher risk from flooding than others. Based on this known evidence, it would be sensible to ensure that all development proposals in these areas undertake a Flood risk Assessment (FRA) as part of any planning submission.

6.27

Flood plains perform the essential function of storing water during flood events. The effectiveness of rivers and flood plains to convey and store flood water and minimise flood risk can be adversely affected by development which physically changes the flood plain. As well as increasing the risk of flooding and impeding works to reduce flood risk, this can destroy the ecological and geological value of the land and break up linear habitats such as river corridors.

6.28

SUDS are a sequence of practices, control structures and strategies designed to efficiently and sustainably drain surface water, while minimising pollution and managing the impact on water quality of local water bodies. These systems are more sustainable than conventional drainage methods because they:

- Manage runoff volumes and flow rates, reducing the impact of urbanisation on flooding;
- Protect or enhance water quality;
- Are sympathetic to the environmental setting and the needs of the local community;
- Provide a habitat for wildlife in urban watercourses; and
- Encourage natural groundwater recharge.

Policy EM9 Air Quality

Major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality, particularly as the city is a designated Air Quality Management Area. Development will be located where it is accessible to support the use of public transport, walking and cycling.

All major development proposals are required to demonstrate that the development does not adversely impact on air quality.

6.29

Emissions from road transport are the major source of pollution in Coventry, with emissions from industry also contributing. Under Part IV of the Environment Act 1995, the City Council carries out annual review and assessment of air quality in the City, within the context of national air quality standards and objectives.

6.30

Areas where these are exceeded must be designated as Air Quality Management Areas (AQMAs) and the Council must produce an Air Quality Action Plan to achieve the standards and objectives. As there are several areas of the city which exceed the air quality standards for NO₂, rather than declare several small AQMAs, the Council has declared the entire city as an AQMA. A review of the 2007 Action Plan to bring about reductions in pollution across the city is currently in progress.

Minerals and Waste

6.31

Coventry recognises the importance of sustainable waste management both locally and in co-operation with other Councils in Warwickshire locality to ensure that all the waste management needs of the area are met.

6.32

In a city such as Coventry with a significant population and a vision for a growing economy, a key issue is that of ensuring that this does not automatically lead to a proportionate increase in waste arisings.

6.33

The National Planning Policy Framework requires each community to take responsibility for their own waste and to adopt the principles of the waste hierarchy – prevent, reduce, reuse, recycle. Coventry will require a sufficient number of waste treatment centres to cater for its needs. Where this involves newer methods of waste treatment, this can often take place in completely enclosed, controlled environments and does not constitute bad neighbour uses.

6.34

Existing waste treatment facilities, however, have often been located in older industrial areas. As these areas are continue to regenerate, the existing uses may not be considered compatible with new, or expansions to existing waste management facilities. In this context, and in order to ensure Coventry's waste treatment needs are met, existing waste treatment facilities will either need to be improved where necessary and safeguarded.

Policy EM10 Waste Management

The City Council's waste management strategy will be supported through:

- encouraging less consumption of raw materials through the reduction and re-use of waste products;
- proposed new or expanded waste management facilities will be assessed against the following criteria:
 - the type and volume of waste;

- the extent to which the re-use and recycling of any waste is facilitated;
 - the use of raw materials;
 - the pollution potential of unavoidable waste;
 - the proposals for disposal of unavoidable waste in an environmentally acceptable manner; and
 - the implementation of lorry or other transport routes
 - the likelihood for process duplication across the City and wider region
- encouragement for new methods of processing and recycling on waste management sites; and
 - a requirement for development proposals to incorporate storage and collection facilities for waste recycling.

Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.

6.35

Residual waste treatment capacity operational or in construction in the West Midlands locality is currently at 1.3 million tonnes per annum. Allocations for waste management sites and areas suitable for new or enhanced waste management facilities will be addressed in the Allocations Plan.

6.36

The Council has published its Municipal Waste Strategy in response to national policy and targets for waste management. Coventry's Municipal Waste Strategy (2008-2020) puts plans in place for the city to increase waste minimisation and re-use unwanted goods, recycle and compost more waste, with the least amount of waste being sent to landfill as possible. Between August and November 2008, the Council consulted on a draft version of Coventry's Municipal Waste Strategy (2008-2020) and, following overwhelming support for the strategy's aims and objectives, the final version was adopted by Council in February 2009.

6.37

Coventry is one of the highest performing authorities for diversion of municipal waste away from landfill. In 2010/11 less than 4.85% of household waste and less than 9% of municipal waste was landfilled. Of the remaining household waste, 37.3% was recycled or composted (37.3% of household waste) and 57.87% of household waste) was used to generate electricity at the Energy from Waste Plant (EfW).

Existing Waste Management Facilities

6.38

The urban nature of Coventry and the lack of active quarrying activity allows little or no opportunity for existing or future development landfill capacity in the City. Therefore, the City will continue to rely upon landfill capacity in surrounding authorities for the life of this Core Strategy to manage wastes that cannot be reduced, re-used, recycled, composted or recovered. Whilst the total volume of waste landfilled is likely to fall over the life of this plan it should be considered that an

increasing percentage of waste that is landfilled will be classed as hazardous waste, e.g. asbestos.

6.39

However, Coventry hosts a number of other waste management facilities for the treatment of both commercial and municipal wastes, including:

- 1 X Energy from Waste facility, Bar Road – (used by Coventry, Solihull, Warwickshire, Hereford and Worcester, Leicestershire, and Walsall councils);
- 1 X Civic Amenity Site at Bar Road;
- 1 X municipal waste transfer station at Stonebrook Road, Longford;
- a number of metal treatment / recycling facilities; and
- Numerous privately Waste Transfer, Bulking, and Material Sorting facilities – (used by Coventry, neighbouring authorities, and private businesses).

New Waste Management Facilities

6.40

Coventry recognises that the future sustainable management of waste is an area of growth and has significant potential for job creation.

6.41

To support the implementation of both the City's Climate Change and Waste Management Strategies, Coventry would support the development of facilities that recycle and recover value from waste. In particular, facilities that are developed along with supporting infrastructure that make use of the materials recovered through the waste management process in specific localities that reduce transport journeys will be encouraged.

6.42

For example, a Materials Recycling Facility (MRF) that is co-located with a paper mill or plastic manufacturer along with an Anaerobic Digestion facility that powers and heats the other buildings to develop an eco-park.

6.43

Allocations for waste management sites and areas suitable for new or enhanced waste management facilities will be addressed in the Allocations Plan.

Policy EM11 Safeguarding Mineral Resources

Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. The extent of Mineral Safeguarding Areas are defined on the Proposals Map.

6.44

The National Planning Policy Framework requires local planning authorities to define Mineral Safeguarding Areas (or MSAs for short) in Local Plans in order that proven mineral resources are not needlessly sterilised by non mineral development, although there is no presumption that resources defined in MSAs will be worked.

6.45

MSAs are required to identify what are considered to be economic deposits of mineral. The purpose of MSAs is to ensure that mineral resources are adequately taken into account in all spatial planning decisions. They do not automatically preclude other forms of development taking place, but highlight the presence of economic mineral so that it is considered, and not unknowingly or needlessly sterilised.

6.46

In areas where extraction is permitted or is planned, Mineral Consultation Areas will be designated. This has been evidenced through the British Geological Society's Mineral Safeguarding Project, which has been undertaken for the Coventry, Solihull and Warwickshire authorities.

6.47

In Coventry, the predominant economic mineral resource is coal. MSAs for this mineral have been identified having had regard to advice in the 'Guide for Mineral Safeguarding in England' produced by the British Geological Society (BGS) in November 2007. The active underground coal mining site at Daw Mill (which lies outside Coventry's boundaries) has a direct impact on the extensive concealed coal reserves that extend across the southern coalfield. These areas lie in the north western areas of Coventry's administrative boundary.

**Coventry Local Development
Plan**

Section 7

**Delivering Coventry's
Housing Needs**

Core Strategy Submission Draft

Delivering Coventry's Housing Needs

7.1

This chapter outlines the Council's strategy for the delivery of new homes within Coventry and the management of the cities existing housing stock.

Background

7.2

Over the last 20 years (1991-2011) the annual delivery of housing in Coventry has averaged 564 net dwellings, whilst for the last 10 year period this has increased to an average of 681 net dwellings per annum. This is reflective of the regionally established objectives of the time¹ to focus the development of new homes within Major Urban Areas (including Coventry) in order to promote urban renaissance.

7.3

The level of net completions has been influenced by significant levels of demolition arising from urban regeneration throughout the city. This was particularly prominent between 2002 and 2006, where on average; more than 300 dwellings per annum were being demolished. Since 2006 however the annual average has dropped to a little over 100 dwellings. This has largely been reflective of the overall slow down in housing delivery, particularly within the regeneration areas, where houses have been retained in the short term to meet housing need. The level of urban regeneration proposed by this Core Strategy will see a continuation of significant demolition, especially within the areas of Wood End, Henley Green, Manor Farm and Canley.

7.4

Regeneration programmes appear to have been very successful in reducing vacancy within the social sector in particular. Demolition activity has supported this by reducing difficult to let properties and clearing low demand properties. This has driven a reduction in long-term vacant dwellings in the City by 45% between 2004-11 meaning vacancy rates are now below the national average. There do however remain approximately 1,500 long-term vacant properties, which (with intervention) could be brought back into use, helping to meet local housing needs. The continued reduction in vacant properties within Coventry is a key objective of this Core Strategy.

7.5

Through Section 106 delivery and grant funding the provision of 'affordable housing' (as defined by the NPPF) has been increasing in recent years and since 2006 there has been a net gain in 'affordable' dwellings throughout the city. In total, nearly 20% of the cities total housing stock is now made up of 'affordable' homes.

7.6

The housing market in Coventry generally demonstrates lower property prices in comparison with much of Warwickshire (especially Warwick and Stratford Districts). This is reflective of the proportion of homes within Council Tax bands A and B, which account for 71% of all homes in Coventry. Over the last 5 years property prices have fallen meaning their general affordability has improved, however homes in Coventry remain relatively un-affordable for many people on or below average incomes. The main problem confronting Coventry residents remains access to finance in the form

¹ Strategic objectives of both the West Midlands Regional Spatial Strategy (2008) (WMRSS) and Phase 2 Review of the WMRSS (2009)

of suitable mortgage offers. Access to such finance is very closely linked to economic performance and the SHMA has shown strong similarities between local and national economic trends in recent years. There are no signs of the current economic circumstances easing and indeed growth forecasts are continuing to be downgraded.

7.7

Consultation has shown a need to provide a better quality and mix of housing within Coventry, including a range of types of housing and tenures. This particularly includes a need to provide a broader variety of 'affordable' housing, by size, tenure and location. This has been supported by the SHMA which has identified a need to diversify the city's housing stock, encouraging an increase in larger properties to meet the needs of different communities. Furthermore, consultation and evidence have highlighted the need to consider 'group specific' housing needs, such as student accommodation, retirement dwellings, care homes and sites for Gypsies and Travellers.

Existing Guidance

National Policy Guidance

- NPPF (2012) (including statement on Gypsy and Traveller Provision)
- Circular 08/2010 - Changes to planning regulations for dwelling houses and Houses in Multiple Occupation (November 2010)

Local Evidence Base

- Coventry and Warwickshire Duty to Cooperate – Housing Delivery (2012);
- Strategic Housing Land Availability Assessment (SHLAA) (2012);
- Strategic Housing Market Assessment (SHMA) (2012);
- Affordable Housing Economic Viability Assessment (EVA) (2012);
- Gypsy and Traveller Accommodation Assessment - commissioned jointly with Solihull and Birmingham (2008);
- Coventry Older People's Housing Strategy (2007);
- Student Accommodation Study (2005);
- Student Accommodation Supplementary Data Update (2012)
- Annual Monitoring Report: records housing land supply in Coventry on an annual basis (as at 31 March).
- Density of Development Assessment (2012)
- Supplementary Housing Evidence Paper (2012)

The Overarching Housing Strategy

7.8

Having regard to a variety of evidence documents, consultation responses and local circumstances, the overarching aims and priorities for new housing within Coventry will be:

- To build new homes on previously developed land (PDL) and other vacant or derelict sites;
- To redevelop surplus vacant or under-used industrial or commercial land where a satisfactory living environment can be created and the jobs led strategy is not compromised;
- To reduce the number of long term vacant properties in Coventry;

- Create greater choice within the housing market and diversify the city's housing stock, especially in relation to affordable housing; and
- To build new homes within the City Centre.

The National and Regional Policy Position

7.9

In November 2011 The Localism Act was afforded royal assent and introduced the basis upon which Local Planning Authorities could establish their own, locally evidenced housing requirement, free from the guidance of Regional Strategies (RS). Notwithstanding the court of appeal decision in respect to CALA Homes, the formalisation of this Act, the publication of the new National Planning Policy Framework (NPPF) and the undertaking of Strategic Environmental Assessment associated with the abolition of RS adds weight to departing from regional guidance. Furthermore, development of new locally established housing requirements based on up to date evidence can reasonably be assumed to supersede the basis upon which RS were based. This is not to say the requirements or policy basis of the adopted or draft version of the West Midlands RS are overlooked. To the contrary, both have been considered through consultation, Sustainability Appraisal and the development of the council's evidence base.

To support the development of locally derived housing requirements the NPPF sets out the necessary higher level guidance with no mention of RS.

The National Planning Policy Framework (NPPF)

7.10

The key aims of the NPPF housing policy are to significantly boost the supply of housing, whilst delivering a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

7.11

In delivering these objectives, Local Planning authorities should:

- Fully assess and deliver the need for market and affordable housing in a manner consistent with broader NPPF policy. This should be undertaken through an up to date SHMA and take account of demographic trends, market trends and the needs of different groups in the community. It should also identify the size, type, tenure and range of housing that is required in particular locations across the local area;
- Identify a supply of deliverable and developable housing land to meet at least 5, 10 and 15 years worth of the requirement. This should be undertaken through an up to date SHLAA;
- Also through the SHLAA, establish the appropriateness of a local windfall allowance;
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period. This should be supported by an implementation strategy for the full range of housing describing how the five-year supply of housing land will be maintained;
- Work with local communities to establish the most desirable approach to achieving sustainable development;
- Set policies for meeting affordable housing need;
- Resist inappropriate development of residential gardens;

- Identify and bring back into residential use empty housing and buildings; and
- Set local density standards that reflect local circumstances.

Scale of Housing Development

7.12

In response to the intended abolition of Regional Strategies, the Council commissioned an update of its Strategic Housing Market Assessment (SHMA), which considers the level of need and demand for new homes in Coventry for the next 15-20 years. Alongside the SHLAA (which considers supply) the SHMA is a key piece of evidence when assessing the appropriate level of housing for a specific area.

7.13

It provides an understanding of both need and demand for market and affordable housing, whilst taking into account changes to the housing stock, market dynamics, underlying demand drivers and short and long-term drivers of change.

7.14

In relation to establishing a new housing requirement for Coventry, the SHMA highlights the following issues:

- Current demand is being influenced by constrained access to mortgage finance and the wider economic climate.
- The recent population projections by the ONS (2010 based) are heavily influenced by short term population trends that are highly unlikely to continue and should be treated with caution.
- The performance of the cities economy in recent time raises doubt over its ability to support the level of population growth anticipated by the ONS.
- The overprovision of housing, whilst potentially contributing to a greater choice of housing, could undermine effective demand for homes in more vulnerable parts of the city. These are primarily situated within the designated regeneration and spoke areas, meaning an overprovision of new homes could undermine the urban regeneration of Coventry.
- There is a need to diversify the city's housing stock.
- There is a continuing need for affordable housing throughout the city, as well as a requirement to diversify stock and improve housing pathways.
- The evidence supports a more cautious approach to housing provision in the city than indicated by recent population trends, but with a clear review mechanism to take account of changes in market and economic dynamics throughout the plan period.
- The approach to a jobs led strategy is supported and the scale of aspirations for housing and employment growth should be aligned.

7.15

The SHMA itself put forward a number of potential growth options. These have been considered through Sustainability Appraisal and focused stakeholder engagement. A selection of options has also been considered through public consultation as part of the Council's Housing Options paper in spring 2012.

7.16

Taking into account the requirements of the NPPF, the recommendations of the SHMA, the responses to public consultation and findings of the Sustainability Appraisal, the Council consider the requirement of 11,373² dwellings between 2011 and 2028 to be suitable, realistic, achievable and in keeping with both the views of Coventrians and the overarching principles of this Core Strategy.

7.17

Table 2 identifies the Council's housing land supply. This level of supply has been identified through the Council's new Strategic Housing Land Availability Assessment (SHLAA) and totals 14,400 dwellings between 2011 and 2028. It means that there is sufficient housing supply to meet the specified target, offering a strong degree of flexibility, choice and opportunity throughout all parts of the city. The projected delivery of this supply is identified in the Council's housing trajectory in Appendix 4.

7.18

Specific sites will be identified through a Site Allocation DPD and the land supply position will be continually monitored through the Annual Monitoring Report and bi-annual reviews of the SHLAA. This will also be the mechanism for updating the housing trajectory to keep it up to date and to ensure the Council will maintain a continuous 5 year supply of housing land. In addition the Council will continue to work with key stakeholders through the Housing Theme Group of the Coventry Partnership to encourage and support the delivery of sustainable housing growth.

Table 2: Components of housing supply 2011 to 2028

Supply Component at April 1st 2012	Number of Net Dwellings
Completions (2011/12)	921
Sites With Extant Planning Permission	6,853
Sites Under Construction	783
Identified SHLAA Sites	5,178
Outstanding CDP Allocations	922
Small Site Windfall Allowance	396
Total	15,053

7.19

Given the level of supply identified through the SHLAA, new housing developments will be explicitly prioritised on previously developed land within the existing urban area of Coventry. This will establish a sustainable pattern to urban development, reducing the need to travel, bringing people closer to key services and provisions and prioritising urban regeneration.

7.20

As such, the development of Greenfield and/or Green Belt land will be prohibited unless an express need is established and a 5 year supply of housing land can no longer be demonstrated. If such a situation were to arise the release of the most sustainable Greenfield land would be considered more favourably than the release of Green Belt land and applications would be determined in accordance with the

² In accordance with the NPPF an additional flexibility buffer will be applied as part of the Council's monitoring process. When applied to the overall requirement approximately 569-2,275 dwellings could be added.

presumption in favour of sustainable development³. If such a circumstance were to arise the determination of such sites will be considered through the Councils SHLAA. Land within Coventry's Green Belt or Green Wedges would only be considered for release if very special circumstances were to be demonstrated.

Policy H1: Release of Housing Land

- **Provisions will be made for a minimum of 11,373 additional dwellings between 2011 and 2028.**
- **The 4 Strategic Regeneration Areas at:**
 - **Wood End, Henley Green and Manor Farm,**
 - **Canley,**
 - **Paragon Park, and**
 - **Stoke Aldermoor**

Which are also identified on the proposals map will form the focal points for new housing development during the plan period. These sites will be supplemented by the provision identified in Table 2, the Allocations DPD and City Centre AAP.
- **Housing land will be released to ensure that the delivery of new housing is broadly in accordance with the requirements set out in the housing trajectory and a 5 year supply of housing is maintained.**
- **In order to promote sustainable urban regeneration, priority is given to the development of Previous Developed Land.**
- **The release of Greenfield sites for development in the future (including residential gardens) will only be permitted if they:**
 - 1. Do not have a negative impact on the environmental sustainability of the plan;**
 - 2. Make efficient and effective use of the land available;**
 - 3. Strike an appropriate balance with other policy objectives of the Plan;**
 - 4. Are responding to a demonstrated level of housing need; and**
 - 5. Are necessary to meet an identified shortfall in the 5 year supply of housing land.**

Location of Housing Development

7.21

Future housing developments will be designed to create new and stable communities providing a mix and choice of housing types and tenures. Opportunities to create new areas of housing as part of mixed-use developments will also be encouraged. In accordance with the NPPF the Council will also encourage new self-build programmes, where Coventry citizens wish to build their own homes.

7.22

With the exception of the designated regeneration areas, the allocation of specific sites will be managed through a Site Allocations DPD and the City Centre AAP.

³ In accordance with Paragraph 49 of the NPPF.

When considering the suitability of a site for housing development Policy H2 must be considered to ensure it is situated within a sustainable location.

Policy H2: Provision of New Housing

- **New residential development, including self-build programmes, must provide a quality residential environment which assists in delivering urban regeneration, enhances the built environment and contributes to creating sustainable communities.**
- **New developments must also be:**
 1. **within 1km radius of a primary school;**
 2. **within 2km radius of local medical services;**
 3. **within 1.5km of a designated centre within the city hierarchy (policy SC1);**
 4. **within 400m of a bus stop; and**
 5. **Should have accessibility to indoor and outdoor sports facilities and green space.**
- **Proposals should also be in conformity with all other relevant plan policies.**
- **Developer Contributions via Community Infrastructure Levy and/or Section 106 Obligations may be required to address any deficiency.**

Managing the Existing Housing Stock

7.23

People's need for housing is met from both the provision of new housing and, for the majority, through the existing stock. As such, it is important that there is a balance between the maximum use of existing dwellings and the development of new housing. This may involve an improvement in the quality of homes, as well as the clearance and redevelopment of housing which has reached the end of its useful life. Three key components of this approach are:

- The return of empty properties to habitable use, especially those that have been vacant for more than 6 months. This will be carried out in line with the Council's existing and future Empty Homes Strategies.
- The provision of purpose built student accommodation within the most sustainable locations and the suitable management of Houses in Multiple Occupation (HMO's). This is with a view to 'freeing up' family housing for purchase or private rent and helping to maintain and build stronger, more stable communities.
- The provision of residential care facilities and retirement properties. Again, this can help overcome under occupation of family properties and provide sustainable and affordable alternatives within established communities.

7.24

Where appropriate, existing housing will be renovated and improved, in association with the enhancement of the surrounding residential environment and in order to meet local housing needs. The continued improvement of existing homes in line with

the sustainability and energy efficiency policies of this plan will also be supported and encouraged.

7.25

Demolition and redevelopment schemes will be considered where the existing housing does not meet local housing market needs or is in a very poor state of repair. Regeneration will be undertaken so as to promote sustainable urban living, enhance the public realm, combat climate change, improve accessibility and address social deprivation.

Policy H3: Managing Existing Housing Stock

- **Where appropriate, existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs.**
- **The conversion of buildings from non residential to residential use will be supported providing a satisfactory residential environment is created and the proposals conform to other relevant policies in the Councils development plan.**
- **Demolition and redevelopment schemes will be considered where existing housing stock does not meet local housing market needs, and its redevelopment is demonstrated as being environmentally beneficial.**
- **The loss of housing, especially affordable housing, however will be resisted, without planned replacement at existing or higher densities.**

'Affordable' Housing⁴

7.26

A new Strategic Housing Needs Assessment (SHMA) has been undertaken for the city, which has identified 5 different sub markets across Coventry based on different socio-economic characteristics. The analysis identified the level of housing need within each of these sub-markets as well as a cumulative level of need for the city as a whole. To supplement the needs analysis an Affordable Housing Economic Viability Assessment (AHEVA) has also been undertaken looking at differing value points across Coventry. Together these two documents have supported the preparation of the Council's 'affordable' housing policy and will also guide its Housing Strategy.

7.27

Within the city's lower value sub markets the evidence set out in the SHMA report has identified that there are high levels of both existing and planned 'affordable' housing⁵. This is most apparent within the peripheral wards of Henley and Binley and Willenhall, where the report also recommends greater flexibility in terms of the type and tenure of future affordable housing provision.

⁴ Affordable Housing is referenced in line with the definition in the NPPF

⁵ This primarily includes social rented accommodation with some intermediate provision.

7.28

Such an approach supports the objectives of the Council's regeneration programmes in Wood End, Henley Green and Manor Farm in particular, where the new house-building programme will provide for greater tenure diversification and the re-balancing of local housing markets. The continuation of this programme is vital to providing mixed and stable communities and helping to generate increased demand within these neighbourhoods. Although there are currently higher levels of the supply of affordable housing (in particular within the social rented tenure) in these areas, this does not imply that no further affordable housing is required. On the contrary, further supply is needed in order to diversify the types and tenures of affordable housing and assist households from those localities who aspire to home ownership (but who cannot otherwise afford market housing), as well as contributing to the city's overall need for affordable housing.

7.29

In contrast the evidence set out in the SHMA, shows a significant shortage of 'affordable' housing supply, compared to the identified level of need within the highest value parts of Coventry. Although the general level of need is considerably lower than other parts of the city, the analysis highlights that the wards of Wainbody and Earlsdon in particular have low levels of supply compared to the need in those areas. In terms of viability, the AHEVA suggests that higher affordable housing contributions could be supported in these, and other higher value areas to help support greater levels of provision and help reduce existing shortfalls.

7.30

In more general terms the evidence identifies a development pipeline of at least 1,296 affordable dwellings that are already planned for as of April 1st 2011. In addition the SHMA analysis indicates that in order to meet the shortfall of affordable housing an extra 391 new homes per annum would be required up to 2016, or 205 new homes per annum up to 2021. This means that the level of affordable housing need has increase by approximately 30% on that identified in the 2008 study and highlights the growing pressure on affordable housing in Coventry.

7.31

The achievement of this target solely through the general housing market is likely to prove challenging in Coventry as much of the need is focused within the mid-low value parts of the city where development viability is unlikely to support the necessary requirements. Indeed, further evidence shows that much of the city's recent affordable housing delivery has been through methods over and above developer contributions, with only 4.2% of all affordable housing completions since 2003 coming from Section 106 agreements. It is important to note however that this was over a time of considerable public investment in grant funded schemes. Such funding sources have now been significantly reduced meaning greater dependency is likely to return to section 106 agreements to help deliver affordable homes. As such, the SHMA recommends the diversification of affordable housing supply, with the private rented sector likely to play an increasing role in helping to meet housing need. Furthermore grant funding (where available) and new forms of land management programmes are encouraged to help boost the delivery of new provision in all parts of the city. The Council will also encourage the re-use of long term empty homes to help meet housing needs. The use of compulsory purchase powers or enforced sale may be utilised by the Council, especially where existing owners can not be determined.

7.32

The SHMA also highlights the geographical imbalance of 'affordable' homes throughout the city, with far higher concentrations to the north and east of Coventry,

traditionally within some of the lower value areas. As such, this policy approach seeks to encourage the diversification of the 'affordable' housing stock, by meeting identified needs where they arise and encouraging choice for those in housing need. This policy approach will therefore see the supply of future 'affordable' housing dispersed throughout the city, rather than concentrated in particular localities, helping to meet needs and promote choice.

7.33

Although onsite provision remains the Council's preferred and primary approach for delivering 'affordable' housing, in certain circumstances it may be more appropriate to seek off site provision through the developer making suitable alternative sites available for development. Such an approach will be of particular interest where the 'affordable' housing aspect of a scheme situated in an area of high existing supply could be delivered in an area of low existing provision. In such cases specific consideration will need to be given to design, viability and impact on surrounding areas. Furthermore, there may also be instances where it is more applicable to seek financial contributions instead of on-site or off-site contributions, for example where 'flats over shops' schemes are involved or in areas where large aspiration all properties are proposed in high value areas.

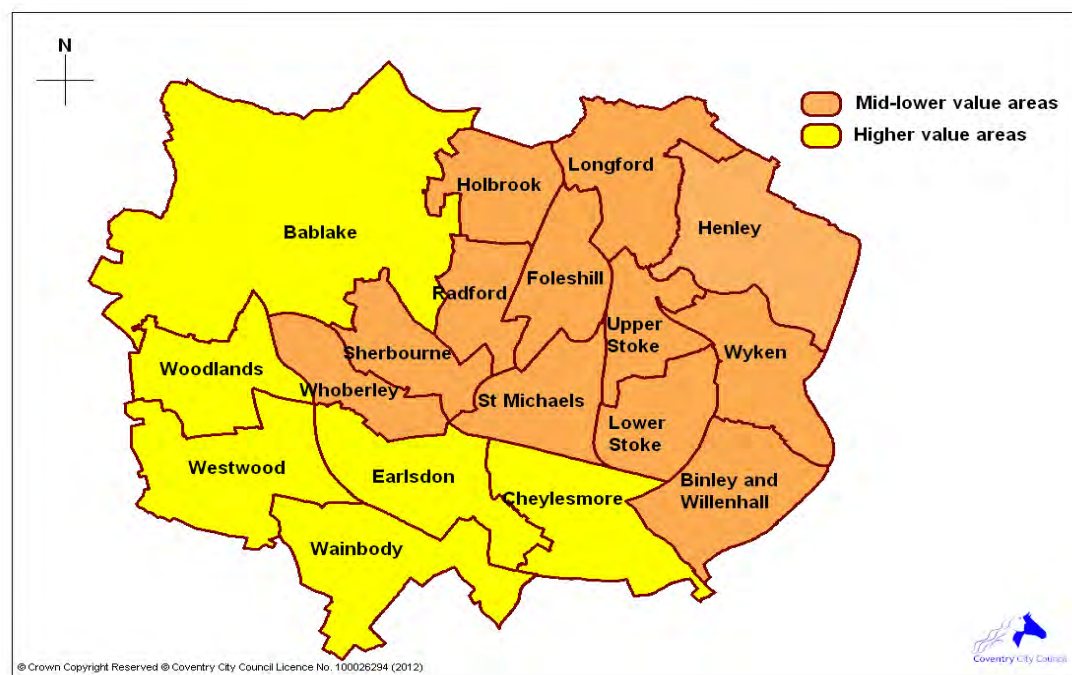
7.34

The Council's Housing Strategy will be maintained to help support the delivery of affordable housing across Coventry. Further guidance on affordable housing types, tenures, standards, delivery and circumstances where off-site or financial contributions may be applicable will also be developed through a new Affordable Housing Supplementary Planning Document.

Policy H4: Affordable Housing

- **New residential schemes of 20 dwellings or more, or more than 0.5ha, situated within the higher value areas of the city (see Figure 1) will be expected to provide 35% of all dwellings as affordable homes.**
- **New residential schemes of 20 dwellings or more, or more than 0.5ha, situated within the mid-lower value areas of the city (see Figure 1) will be expected to provide 25% of all dwellings as affordable homes.**
- **Where the specified level of affordable housing can not be provided, robust evidence must be presented to justify a reduced contribution.**
- **Through appropriate design standards, new affordable housing units must be appropriately integrated within other development on and surrounding the site.**
- **Through engagement with Registered Providers, and having regard to the recommendations of the SHMA, developers should ensure that affordable housing contributions comprise dwellings of the right size, type, affordability and tenure to meet local needs. Further details to support this will be outlined in a Supplementary Planning Document, which will allow greater flexibility in responding to changing market situations and local need.**

Figure 1 – Plan of Value Areas for Affordable Housing Provision



Student Housing Policy

7.35

The City Council commissioned a Student Accommodation Study in 2005 in order to investigate the likely needs and impacts arising from two expanding universities⁶. At the time of the study a number of concerns had been expressed in some inner-city communities about high concentrations of student housing, which could upset the balance of the local area, jeopardising local services and causing problems for non-student residents (through a reduction in demand for schools and local services, noise, anti-social behaviour, demand for parking space and the poor management and maintenance of houses and gardens). Such concerns continue to be raised today through consultation exercises. In contrast there has also been recognition from key stakeholders of the positive benefits which the two universities and their students bring to the City as a whole.

7.36

The Study showed that there were approximately 24,500 full time students at the city's two Universities in 2005. Supplementary evidence has shown that this has increased to more than 35,000 in 2011. The 2005 study showed that approximately 10,500 (43%) of all full time students from both universities were in managed accommodation. Although the number of available bed spaces across the city has increased by 15% since 2005 (meaning there is now a sufficient number to accommodate approximately 12,100 students) the proportion of bed spaces to full time students has not kept pace with the continued growth of the universities, especially Coventry University, and has decreased to 34%.

⁶ Coventry University forms an integral part of the City Centre, whilst the University of Warwick is situated to the south west edge of the city in close proximity to Canley and Westwood Heath.

7.37

The 2005 study highlighted that a number of opportunities had been taken since the turn of the century, especially on sites close to Coventry University, to provide new purpose-built student housing. The supplementary evidence has identified the continuation of this trend, as well as numerous schemes⁷, with extant planning permission, remaining undeveloped. Advice from Coventry University indicates that, with trends towards more students studying locally, there is now likely to be sufficient supply. In respect of Warwick University, the University's Masterplan provides for an increased number of student residences on the extended campus. Market drivers, in terms of planning applications however suggest continued developer interest in purpose built student accommodation, and this is highlighted through the supplementary evidence. Therefore the continued delivery of these purpose built schemes, and those similar in nature, will be supported by the Council as they:

- make significant contributions to the Councils housing land supply;
- meet specific housing needs within the cities population;
- offer modern and high quality accommodation to support both universities;
- Support and facilitate urban regeneration; and
- Help minimise the uptake of family housing by students in the private rented sector.

7.38

As suggested above the continued growth of the private rented sector for student accommodation remains an issue within Coventry, especially in parts of the city outside of the city centre but within close proximity to either university. The 2005 study identified a considerable proportion of students living in private rented accommodation, with approximately 11,700 students utilising this housing tenure⁸. Although more up to date local information is not readily available, the SHMA has identified a substantial nationwide growth in the private rented sector in recent years. By virtue of the relative decline in managed accommodation compared to student numbers it is reasonable to assume that the number of students living in private rented accommodation will have increased significantly in Coventry since 2005. In doing so it is likely that the pressures associated with high proportions of private rented accommodation, in particular Houses in Multiple Occupation (HMO's) would also have increased.

7.39

National guidance however allows the conversion of traditional homes into HMO's⁹ through permitted development unless the local planning authority issue an Article 4 direction requiring a planning application to be submitted. Given the importance of the two universities to the city, the Council have not exercised this option. As such the SHMA identified the importance of ensuring sufficient housing is accessible to all aspects of the cities population in order to meet housing needs. Furthermore the SHMA also highlighted that HMO's can also provide an affordable housing option for young professionals and graduates alike. They therefore contribute towards meeting the housing demands of the cities workforce both current and future. Therefore the Council have opted not to issue an Article 4 direction in relation to HMO's at this time. Continued monitoring of the situation however will be managed through the Council's Annual Monitoring Report, and changes proposed accordingly.

⁷ Comprising a minimum of 2,303 bed spaces

⁸ figures were based on household responses to the 2001 Census.

⁹ Defined in the use classes order (C4) as homes occupied by between 3 and 6 unrelated individuals

Policy H5: Student Housing

- **Purpose-built student accommodation and conversions of non residential properties will be encouraged in areas that are accessible from the universities and where such development can play a part in the regeneration of these neighbourhoods, without disadvantage to local services.**
- **The conversion of existing homes to new student accommodation however will not be permitted in areas where there is a significant amount of purpose built student accommodation and where the proposals would materially harm:**
 - a) the amenities of occupiers of nearby properties (including the provision of suitable parking provisions);**
 - b) the appearance or character of an area; and**
 - c) local services.**

Gypsies and Travellers

7.40

The new Planning Policy for Traveller sites (March 2012), which supplements the NPPF provides national guidance on planning for Gypsy and Traveller¹⁰ sites. The overarching aim of this document is to “ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community”¹¹.

7.41

In order to consider local needs a Gypsy and Traveller Accommodation Assessment was carried out in 2008, in conjunction with Birmingham and Solihull Councils. This identified two Gypsy and Traveller sites in Coventry. The site at Siskin Drive is owned by the City Council and managed on temporary contracts by a private company, whilst the site at Burbages Lane is owned by a specific extended family. The study showed that many Gypsy and Traveller households within Coventry meet their accommodation needs in permanent dwellings: however, it is difficult to provide a reasonable estimate for the City.

7.42

Based on an assumption that the Siskin Drive site would be refurbished and remodelled to provide fewer, larger pitches better meeting modern design standards, the study concluded that there is no additional requirement for pitches in the City between 2007 and 2017. It also concluded that the City should identify land for temporary stopping places to avoid nuisance caused by uncontrolled encampments in unsuitable areas. Since the completion of this study however evidence shows that there have been no recorded unauthorised sites within the city. As such, the site at Siskin Drive is identified on the Proposals Map and the commencement of its remodelling has been secured through grant funding from the Homes and Communities Agency (HCA). The specific allocation of temporary stopping places will be managed through the Allocations DPD if further monitoring shows a continuing

¹⁰ For the purpose of policy, Annex 1 of the National Planning Policy for Traveller Sites provides a definition of Gypsies, Travellers and Travelling Show people.

¹¹ Paragraph 3 - the National Planning Policy for Traveller Sites (March 2012)

need within Coventry. In order to guide the identification of temporary sites and help determine applications for any 'windfall' applications national guidance requires local development plans to establish criteria based policies that are "fair and that facilitate the traditional and nomadic life of travellers whilst respecting the interests of the settled community". This is set out in Policy H6.

Policy H6: Gypsy and Traveller Accommodation

- **Provision will be made for one transit site for Gypsies and Travellers through the re-modelling of the site at Siskin Drive, Coventry.**
- **Applications for new Gypsy and Traveller sites within the Green Belt will be refused as they constitute inappropriate development unless very special circumstances can be demonstrated.**
- **Proposals for additional Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria:**
 - (a) The sites use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding, contamination or agricultural land quality;**
 - (b) Sites should be located within reasonable travelling distance of local services and community facilities, including a primary school;**
 - (c) The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;**
 - (d) The site should be served by adequate water and sewerage connections, power and waste facilities;**
 - (e) The use of the site should not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated.**

Care Homes, Nursing Homes and Older Peoples Housing

7.43

Primarily as a result of improved life expectancy the number of people aged over 60 is expected to increase by more than 25% from approximately 62,000 in 2011 to more than 78,000 in 2028¹², whilst the population aged over 85 is also scheduled to increase by in excess of 35%. The Council's Older Peoples Housing Strategy identified some key themes to improve the range and quality of housing available to this age group. These included enabling older people to maintain their independence and to make active and informed choices for suitable housing, care and support, while maximising their quality of life. The Council will therefore work with key stakeholders and encourage various housing options for older people, which may include the provision of new purpose built accommodation ranging from suitably designed and spacious bungalows to fully accessible apartment schemes and larger housing with appropriate levels of care, services and support. Schemes that propose a mix of tenure and care facility will also be supported and encouraged. This reflects

¹² 2010 based sub-national population projections published by the ONS in 2012

the increasing variety of accommodation available to older people and the importance of meeting the specific housing needs of this aspect of the city's population. As such older people's residential provisions will also provide valuable additions to the council's housing land supply as it will meet the needs of identified households.

7.44

To help facilitate increased supply of appropriate residential provision the Council will encourage diverse provision through appropriate funding and the recycling of suitable council-owned sites. The Council will also seek to improve upon and expand, where necessary its existing stock of housing aimed at supporting those groups with specific needs e.g. Learning Disabilities, PSI and other supported housing.

7.45

Building Regulations require all new dwellings to be accessible and useable. In general, new dwellings are constructed to mobility standards, having regard to the characteristics of each site, which enables anyone who has or develops impaired movement or a wheelchair user to have reasonable access to and within the dwelling. New dwellings should however also be built to, or be easily adaptable to Lifetime standards. Lifetime homes incorporate features, which make the dwellings easily adaptable to changing family needs, and enable everyone to live independently.

Policy H7: Care Homes, Nursing Homes and Older Peoples Housing

- **Proposals for care homes and nursing homes will be encouraged in areas that are accessible by a choice of means of transport and that are situated in close proximity to key local services.**
- **Proposals should be of a high quality and design and be compatible with the character of the surrounding area.**

Residential Density

7.46

The NPPF specifically encourages the identification of locally set density requirements that reflect local circumstances. In order to support this, the Council have undertaken a detailed assessment of recent developments throughout Coventry in order to identify development density trends and build patterns.

7.47

In order to promote sustainable urban regeneration, new residential developments must promote the most efficient and effective use of land within the urban area. The assessment of recent developments has shown that the density and mix of residential development largely reflects local density patterns, and this must continue. In order to support urban regeneration and high quality design development must ensure that land is used as intensively as is compatible with the protection of the quality, character and amenity of the area. Higher densities do not and should not compromise the quality of new development and, indeed, they can continue to be achieved using a variety of building types in response to local character and context.

7.48

The best locations for higher density development would be within or adjacent to designated centres or public transport nodes. This is particularly true of the City Centre where recent densities have consistently exceeded 100 dwellings per hectare (dph).

7.49

However, the character of some parts of the City, particularly to the south and west, is formed by lower density development and such development plays a major role in providing a choice in housing and in contributing to the diversity of the City's housing market.

7.50

Thus design principles will be vital when delivering both higher densities, protecting local distinctiveness and ensuring an attractive environment for residents, businesses and investors.

Policy H8: Residential Density

- Residential development, including conversions, must make the most effective and efficient use of land whilst ensuring compatibility with the quality, character and amenity of the surrounding area.
- Therefore, outside of the Ring Road (The A4053) a minimum of 35 dwellings per hectare (net) should be provided on Previously Developed Land.
- Developments inside the Ring Road (The A4053) should provide a minimum of 100 dwellings per hectare.
- If Greenfield sites are required for development in the future they should achieve a minimum of 30 dwellings per hectare (net).

City Centre Housing

7.51

The 2001 CDP promoted the creation of a 'living heart' for Coventry, where people would want to live, work and be educated. Since 2001, approximately 1,300 new dwellings have been built within the city centre, accounting for nearly 20% of all new homes built in Coventry over this timeframe.

7.52

A key objective of this new development plan is to promote the regeneration of Coventry city centre, and the provision of new homes remains a key aspect of achieving this aim. The SHMA has identified the city centre as a relatively unique aspect of the city's housing market, having significant potential to grow and diversify, particularly in relation to the tenure of new housing. In this context the SHMA particularly points to the potential for site specific investment in the private rented sector and purpose built provision. While this is relatively embryonic across the UK, the HCA has suggested that it will provide support for local authorities in brokering relationships with investors. Such provision would provide specific benefits in terms of meeting housing need, providing choice and flexibility within the market and aiding regeneration through high quality residential provision in a sustainable location.

7.53

At the current time there is extant planning permission for approximately 1,600 dwellings within the broader city centre area, of which around 32% comprise purpose built student cluster flats or studio apartments. This development pipeline will continue to contribute towards the regeneration of the city centre with many of the residential proposals forming parts of mixed use developments.

Policy H9: City Centre Housing

- **New residential provision within the city centre, either through conversions or new build, will be supported so long as:**
 - **It makes the most effective and efficient use of land;**
 - **Is compatible with the quality, character and amenity of the surrounding area;**
 - **Provides for a variety of types and tenure; and**
 - **Does not conflict with other development plan policies or national planning policy.**

- **Specific sites will be allocated through the City Centre Area Action Plan**

**Coventry Local Development
Plan**

Section 8

Jobs and Economy

Core Strategy Submission Draft

A Prosperous Coventry with a good choice of jobs and business opportunities

Background

8.1

Coventry's economic base has been shifting away from manufacturing (55% of jobs in the 1970's, now 14%) and towards services and distribution. While the two recent economic shocks have brought about many thousands of job losses in Coventry, the structural trends of the city's economy are expected to continue over the Plan period as a whole. This trend has driven changing needs for employment land and premises. The city has already experienced considerable recycling of large former factories ("churn"), notably car plants, and some of these have continued in employment use while others have been released in whole or part for new homes to be built. The city's employment base now has a strong reliance on local government, the university hospital and the two universities. However, new employment resulting from new technology, notably "green" technology, offers an opportunity to increase and diversify the city's economic base in the future. A balanced, mixed economy will require the retention and expansion of a range and choice of sites and premises

8.2

Consultation has discussed principles for economic development in Coventry, showing that an adequate supply of employment land is needed to prevent net out-migration and out-commuting. Research indicates that the supply of new jobs is expected to come from a number of sources, about half within the City Centre, others through expansion of the two Universities and University Hospital Walsgrave, with the remainder accommodated on 'employment land'. It is important that existing headquarters operations within the City are retained, whether they are located within a defined centre or not.

Existing Guidance

National Policy Guidance

National Planning Policy Framework (2012)

Regional Policy Guidance

Existing Regional Spatial Strategy (RSS) sets out key policies

- Coventry – Nuneaton Regeneration Zone and Coventry, Solihull & Warwickshire High-Technology Corridor
- New Regional Investment Site (25 – 50 hectares) needed to serve Regeneration Zone;
- Major Investment Site (50+ hectares) for a single user identified at Ansty; and
- Regional Logistics Sites to be identified (50+ hectares) within the region

RSS Phase Two Revision (Preferred Option) sets out key policies and employment land requirements for Coventry between 2006 and 2026:

- Coventry – Nuneaton Regeneration Zone (RZ), and Coventry, Solihull & Warwick High-Technology Corridor (HTC) are retained;
- Ansty site becomes Regional Investment Site;
- Coventry needs to ensure a supply of at least 82 hectares (203 acres) of readily-available employment land at any one time, but land at Ryton, in Rugby District contributes to this land supply;

- large scale B8 is encouraged to locate on identified Regional Logistics Sites in and around the region; and
- land unexpectedly becoming available as a result of large factory closures to be prevented from alternative re-use in advance of LDF revision

Economic Development Strategy (Innovative Coventry: A Strategy For Growth And Transformation)

The Economic Strategy sets out what needs to be done to create the jobs needed to achieve the growth of the City. The single most important message of this Economic Strategy is that local partners should come together to set a direction and priorities for the growth and transformation of the City. The Economic Strategy is based on the central idea that uncertainty is a key feature of the emerging global economy and that our task, to be a successful City, is to adapt and respond quickly to the opportunities and challenges. The Economic Strategy explicitly endorses a pathway based on achieving transformational growth. Coventry should seek to achieve urban regeneration and improved quality of life for the benefit of everyone who lives, works and visits.

Relevant Evidence Base

Employment Land Review - DTZ 2007. Commissioned by Coventry, Solihull & Warwickshire Forum

RELS (Regional Employment Land Study): Records employment land supply across the West Midlands region on an annual basis (as at 31st March).

Regional Centres Study, part of the evidence base to RSS Phase Two Revision, sets out recommendations for distribution of office space requirements across the region.

Employment Land Provision: WMRSS Phase Two Revision Draft Background Paper – Prosperity for All Policies (November 2008)

The Council's Annual Monitoring Report records employment land supply in Coventry on an annual basis (as at 31st March).

Review of existing employment sites and premises, categorised sites according to their relative quality, and the RELS definitions.

Research & Strategy Team "Coventry's Economy 1976 to 2026" study, looks back to 1976, and forward to 2026. Investigates trends and strategies, and estimates the quantum of 'employment' land (B1, B2, B8) that will be required to serve Coventry between 2006 and 2026.

Coventry's Economy: Employment Land Requirements Update (January 2012) took the assumptions used in the previous study and applied them to the options for a new housing target

Location and Provision of Employment Land

8.3

"Coventry's Economy: Employment Land Requirements Update (January 2012)" considered the likely numbers of economically active people and also the likely type of jobs. It estimated that around half of the new jobs will be within the City Centre, of which office jobs will be about 35%; retail jobs about 10%; and another 5% of jobs in the leisure industry within the City Centre.

8.4

Outside the City Centre, office and related jobs, including the expansion of the University of Warwick and University Hospital Walsgrave, can be expected to provide a significant number of new jobs. The majority of the remainder of new jobs will be provided on 'industrial land' within Classes B1 (light industrial and R & D), B2 (general industrial), and B8 (storage and distribution) uses.

Skills

8.5

Coventry needs to maximise the opportunities for innovation, maintaining and strengthening links between the Universities and local businesses and business organisations, as well as the provision of a range and choice of employment sites and premises to enable businesses to remain in the City as they grow.

Policy JE1 : Overall Economy and Employment Strategy

In order to maintain a balanced local economy, maximise employment opportunities and skill levels, and ensure that businesses have a range and choice of sites and premises, the Core Strategy:

- Focuses office, retail and leisure employment generating developments within the City Centre
- Supports the expansion of University of Warwick, Coventry University and University Hospital Walsgrave
- Maintains a 30 hectare 'minimum reservoir' of sites to provide the remainder of new jobs in Coventry;
- Protects employment sites from redevelopment to other uses; and
- Directs large scale storage and distribution development to Regional Logistics Sites, in order that efficient use is made of employment land within the City.

8.6

In order that a balanced economy is maintained, with a diverse employment base, the priorities for Coventry are to:

- Ensure sufficient industrial land is available at all times;
- Ensure a range and choice of employment sites and premises is available at all times;
- Protect existing headquarters;
- Protect the best quality employment sites and premises from competing uses;
- Resist proposals for the release of existing sites in employment use unless it is demonstrated that their location is inappropriate to meet modern industrial needs and/or their continued use would result in adverse effects on amenity or highway considerations;
- Promote the City Centre as a major office, leisure and retail destination; and
- Direct large-scale storage and distribution (B8) uses towards Regional Logistics Sites.

8.7

The overall growth strategy is jobs-led, so it is important to plan for sufficient new employment opportunities to enable the housing growth to be achieved. The "Coventry's Economy: Employment Land Requirements Update (January 2012)" study estimates that 33,071 new jobs will need to be provided between 2011 and 2028 to serve Coventry. Providing sufficient employment land to accommodate these additional jobs, plus jobs to replace those lost through local economic restructuring,

as well as to achieve full employment will require the development for employment use of 100 hectares (about 247 acres) of land.

8.8

Employment land availability will be monitored so that the Council can take action to ensure the reservoir is maintained.

8.9

The RSS Preferred Option sets out Coventry's requirement to maintain a supply of readily-available ("minimum reservoir") employment land of 82 hectares – about 203 acres (for those uses falling with use classes B1 B2 and B8) at all times. Given that the RSS employment land figure was linked to a corresponding housing target that is now considered to be unrealistic, it is right and proper to re-appraise the employment land requirements during the Plan period. The evidence shows that, with a housing target of 11,373 new homes between 2011 and 2028, an appropriate amount of B-class employment land to be maintained through a "minimum reservoir" approach is in the order of 30 hectares. Policies will endeavour to maintain a range and choice of sites across the City.

8.10

It is not intended that land will be allocated by the Core Strategy to meet the entire indicative longer term requirement for employment land to 2028. This is to avoid large areas of land remaining undeveloped for substantial periods. Policies will maintain sufficient land to meet the City's 'minimum reservoir', and monitor the take-up of readily available sites. As 'minimum reservoir' sites are developed, it may be necessary to allocate additional land to maintain the reservoir of readily-available sites.

8.11

Where possible, within the reservoir, priority will be given to previously -developed land in, or accessible by public transport, walking and cycling to, the Regeneration Zone.

8.12

Policy SG15 indicates the Council's broad approach to ensuring an adequate supply of readily available employment land.

Protection of the best quality employment sites and premises from competing uses

8.13

With an employment led strategy it is critical that we retain the better quality employment sites in employment use. The Council has updated its review of employment sites and premises in Coventry and categorised them in order to provide information about their relative quality. Based on this work, a geographical spread of sites exists which will continue to provide jobs in accessible locations close to where people live. The location of sites in relation to the strategic highway network is an important element to their relative quality. To assist the viability of redevelopment an element of residential covering no more than half of any one site's area may be supported.

Policy JE2 : Provision of Employment Land and Premises

Existing employment sites will be retained. A minimum supply of new employment land on a 5 year rolling cycle of 30 hectares that is required to be available at all times in Coventry (the “Minimum Reservoir”). This will be achieved by using recycled land. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report.

Policy JE3 : Protection of Best Quality Employment Land

Proposals for redevelopment to other uses of employment sites will be assessed to determine:

- i) The physical suitability of the use of the land for employment purposes;
- ii) The market attractiveness and viability of the site for employment purposes, irrespective of the attractiveness of the land for alternative, higher-value uses;
- iii) Whether the site is or can be served by high quality public transport; and
- iv) The potential contribution of the land to the level of employment land required over the plan period.

The loss of entire sites or headquarters to other uses will not be permitted. In the event that a headquarters operation closes, or the business is subject to a takeover or amalgamation, the site will not be permitted to transfer to non-employment (B1/B2/B8) use or uses.

Policy JE4: Mixed use redevelopment of employment land

Redevelopment of existing employment sites to a mix of uses will require the applicant to demonstrate that an element of other use or uses of the land is necessary in order that the redevelopment as a whole is viable. In the event that employment sites come forward for redevelopment, normally no more than 50% of the site area shall be for residential use.

8.14

Headquarters operations would normally be expected to serve a regional, national or international market and include:

- Axa, City Centre;
- Camping and Caravanning Club, Westwood Business Park;
- Jaguar, Whitley;
- LTI / Carbodies, Holyhead Road;
- Peugeot, Humber Road;
- Skills Funding Agency, City Centre;
- RICS (Royal Institute of Chartered Surveyors), Westwood Business Park; and
- Severn Trent Water, City Centre

Promote the City Centre as a major office, retail and culture and leisure destination

8.15

Large scale office development falling within Use Classes A2 and B1a of the Town and Country Planning Use Classes Order 1987 (as amended) will generally be permitted within the City Centre. Large scale office development is defined as 5,000

square metres gross floorspace. Proposals for smaller scale office development will need to demonstrate that

- i) The proposal could not be accommodated within or at the edge of a defined centre, or within an existing employment area;
- ii) There would be no adverse impact on the prospects of committed office development schemes proceeding within an identified centre;
- iii) Adequate public transport access exists to all of the intended catchment, or will be provided by the proposal; and
- iv) There would be no unacceptable environmental impacts.

Direct large-scale storage and distribution (B8) uses towards regional logistics sites

8.16

RSS identifies a number of Regional Logistics Sites (RLS) and directs large scale storage and distribution (B8) to RLS locations. B8 uses require regular trips to and from the site by large goods vehicles, using urban and suburban roads which may not be well suited to such traffic. Large scale storage and distribution is currently defined as being in excess of 4000sqm and is best located on RLS or other sites that are accessible by rail. It is therefore to be discouraged within the urban area of Coventry. The definition of storage and distribution includes open storage.

Policy JE5 : Storage and Distribution (B8)

Proposals for large scale storage and distribution in Coventry will not be permitted unless each of the criteria below are satisfied:

- The site is served, or capable of being served through the development by rail freight, or is well located to access a primary route;
- There are no appropriate sites readily available within RLS within a reasonable timescale; and
- The site is easily accessible by public transport, walking and cycling.

Small scale storage and distribution development will be permitted, provided that the site is located on a primary route, and is easily accessible by public transport, walking and cycling

**Coventry Local Development
Plan**

Section 9

Shopping and Centres

Core Strategy Submission Draft

Introduction

9.1

Coventry has a varied network and hierarchy of centres across the city and the Council has a key role to play in ensuring that they provide a wide range of goods and services that are accessible to all.

9.2

To ensure that Coventry can continue to provide high quality shopping and further enhance the retail offer in the city, together with improving the local economy, a network of centres, provides for a wide range of retail and service uses locally, therefore ensuring that they are accessible to both local residents and those from further afield.

9.3

Appropriate uses in centres should include:

- retail;
- leisure and entertainment;
- sport and recreation;
- offices;
- housing;
- culture and tourism;
- social and community facilities.

9.4

The Council will co-ordinate the development of a wide range of public, private and community bodies as well as providing some of these facilities and services itself.

9.5

The Core Strategy aims to ensure that neighbourhoods will be balanced communities that can support a range of facilities locally and will therefore be more sustainable.

This will mean:

- providing appropriate shops, facilities and services in sustainable locations;
and
- creating and maintaining attractive neighbourhoods.

It also looks to narrow the gap between the "spoke" areas and the rest of the city.

9.6

The type, scale and size of town centre uses will vary between centres, dependent upon their position within the hierarchy. These should be provided at an appropriate level, within the network of centres, so that people can choose to walk, cycle or use public transport to access them.

Existing Guidance

National Policy Guidance

National Planning Policy Framework (2012)

The National Planning Policy Framework sets out policies for ensuring the vitality of town centres. "Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period."

Relevant Evidence Base

The Coventry Shopping and Centres Study 2006 (SCS), carried out by Nathaniel Lichfield & Partners for the Council, considers the general approach to centres, including the city centre, their health and their possible future roles as well as capacity and qualitative need for further shopping floorspace to 2016. The capacity element of the study was updated to 2026 in October 2008 (SCS 2008 Update).

Shopping

9.7

The SCS shows that the city centre's primary shopping catchment area for comparison goods extends well beyond the city boundary. Within the city, there are only small areas that are not within the catchment of a Major District (3km radius), District (2km radius) or Local (1km radius) centre.

9.8

The SCS 2008 update is based on more detailed local information and more recent data on expenditure growth. It predicts capacity across the city, over and above 2008 commitments, for the period 2006 to 2016:

- around 2,200m² net (trading) convenience shopping floorspace; and
- around 32,700m² net (trading) comparison shopping floorspace (around 43,600m² gross).

- For the period between 2016 and 2021, the SCS 2008 Update predicts capacity for:
- around a further 4,000m² net (trading) convenience shopping floorspace; and
- 35,100m² net (46,800m² gross) comparison shopping floorspace.

For the period between 2021 and 2026, the 2008 Update predicts capacity for:

- around a further 4,600m² net (trading) convenience shopping floorspace; and
- around a further 41,100m² net (54,800m² gross) comparison shopping floorspace.

9.9

A number of commitments across all centres have been approved since the SCS 2008. These include:

- Bishopgate up to 11,157m² (Outline application approved 6th June 2011)
- Friargate up to 5,500m² (Outline application approved 15th January 2010)
- Asda, Daventry Road 960m² gross, 801m² net (trading) area
- Tesco, Holyhead Road 271m²
- 7-9 Brays Lane, Stoke 318 m² net (trading) area
- Evening Telegraph offices, Corporation Street 1,500m²

The Network of Centres

9.10

The Coventry Core Strategy adopts a sequential approach, which seeks to locate major comparison shops and other facilities and services that are likely to draw customers from a city-wide and beyond catchment within the city centre. The Primary Shopping Area (town centre) and Shopping Expansion Areas are defined on the city centre inset plan to achieve this. Comparison and convenience shops, facilities and services which serve suburbs but do not have a city-wide catchment will be appropriate in the Major District Centres and District Centres. This may include branches of national multiple shops, libraries and sports centres but no significant expansion of these centres beyond existing commitments is envisaged. Below this, Local Centres will include mainly convenience shops and other day-to-day facilities and services.

9.11

Centres are the preferred locations for a wide variety of uses including the “food and drink” uses in classes A3, A4 and A5. These will normally be supported on the basis of an expected lesser impact upon residential amenity, and the good accessibility of centres. A balance will, however, always be sought that retains a centre’s key role for convenience and comparison shopping, and maintains its vitality, viability and character. Centres should include a residential element, either through “over the shop” conversions or new build and be a focus for further improvements to public transport services, walking and cycling to ensure their sustainability. Finally they should be a focus for environmental improvements to ensure that they are attractive locations for their neighbourhoods.

9.12

The Major District, District Centres and Local Centres are shown on the Proposals Map. The boundaries of all centres have been reviewed where appropriate to allow for greater flexibility for developable space and widen their role. A boundary is proposed for the Arena Park major District Centre. "Enabling" ancillary uses, at an appropriate scale, may be supported to bring forward development of the "leisure land" at Arena Park.

9.13

It is important to ensure that proposals for development in these centres are appropriate to their defined function and catchment areas and, in particular, do not divert investment from the city centre. The challenge for some of these centres, particularly the Major District Centres, will be to move beyond being merely shopping centres to developing a wider role through the inclusion of social, community and leisure uses, office employment and a residential element so that they can meet wider aspirations for these services and facilities.

City Centre

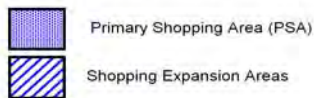
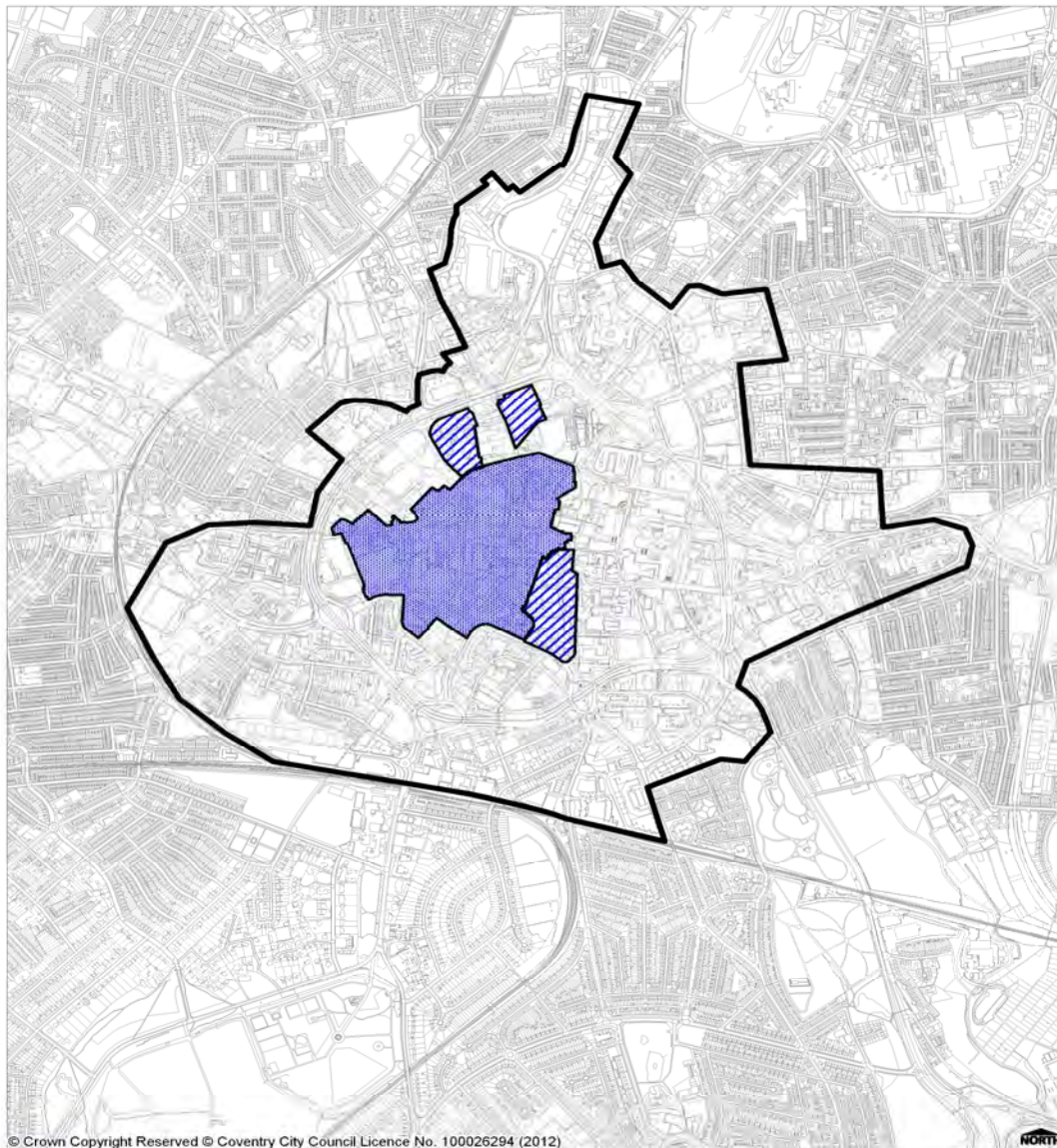
9.14

The city centre remains the focus for regeneration. The Council is currently considering an application for the comprehensive redevelopment of the Southern half of the principle shopping area (use classes A1/A2/A3/A4/A5 up to 57521 m² gross and 16245 m² net)

9.15

The Northern half is likely to follow in future years. The forthcoming city centre area action plan will address these in more detail.

City Centre Inset Plan



Major District Centres

9.16

Centres change over time and, in the Coventry Development Plan, Ball Hill is defined as the Major District Centre to serve the eastern side of the city. It has been declining as a result of limited opportunities to adapt to meet the changing requirements of shoppers and traders, its proximity to the city centre and continues to be seriously affected by heavy through traffic. As a result, it will be redefined as a District Centre, and the extended Brandon Road centre takes its place as a Major District Centre. The expanding centres at Arena Park and Cannon Park will continue in their role as Major District Centres.

District Centres

9.17

The District Centres, including Ball Hill, continue to provide a generally good service to their parts of the city. However, Bell Green would benefit from environmental and amenity improvements to continue to serve its catchment. Brade Drive has been removed from the centres hierarchy, as it does not function as a District Centre. Due to its scale, character and variety of goods and services on offer, Brade Drive is not seen as providing the appropriate mix of uses or linked trips that should be expected of a District Centre.

Local Centres

9.18

Local Centres provide a suitable and accessible range of day-to-day shops and services. They are also a focus for social, community and leisure uses for the local area. They are defined on the Proposals Map, and have been reviewed in the light of changing circumstances.

Well-established Local Shopping Parades

9.19

Long - established local shopping parades, while not of the same scale as local centres, and in most cases include only "top-up" convenience shopping, limited services and food and drink outlets, make an important contribution to the communities they serve.

Policy SC1 : The Network of Centres

A. City Centre (Hub)

The city centre will continue to be developed to make it a showcase for the city.

This means promoting, encouraging and supporting:

- high quality, legible environments and designs;
- recognition, preservation and enhancement of heritage and protection of key views of the three spires;
- vital, viable and growing shops, services, cultural facilities and leisure attractions;
- central employment locations;
- a variety of places to live;
- accessibility for all;
- activities around the clock;

An Area Action Plan (AAP) will be prepared, to guide future developments within the city centre. The Primary Shopping Area (town centre) and city centre inset boundary are defined on the Proposals Map.

B. Outside the City Centre

Outside the city centre, the Council will designate, enhance, maintain and protect a network of centres consisting of Major District Centres, District Centres and Local Centres. These centres will be the preferred locations for new shops, services and other uses which do not serve a city-wide catchment.

C. Major, District and Local Centres

In all these Centres:

- an appropriate balance will be sought between shops (Class A1), services and other uses including Financial & Professional services (Class A2), Restaurants and Cafes (Class A3), Drinking Establishments (Class A4), Hot food takeaways (Class A5), Non-residential Institutions (Class D1) and Assembly and Leisure (Class D2). This will seek to protect the vitality, viability character and role of the centre as a whole; and
- include a residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment; and
- improvements to the environment and accessibility will be promoted and encouraged

D. Major District Centres

Major District Centres are shown on the Key Diagram and Proposals Map at:

- Arena Park;
- Cannon Park;
- Brandon Road.

They will complement but not undermine the role of the city centre and will contain an appropriate scale of development for their part of the city (around a 3km radius) for:

- a mix of convenience and comparison shopping as well as service and catering uses;
- social, community and leisure uses including hotels; and
- offices.

E. District Centres

District Centres are shown on the Key Diagram and Proposals Map at:

- Ball Hill;
- Bell Green;
- Daventry Road;
- Earlsdon
- Foleshill;
- Jardine Crescent;
- Jubilee Crescent

They will contain an appropriate scale of development for their district of the city (around a 2km radius) for:

- convenience shopping as well as an element of comparison shopping, service and catering uses;
- social, community and leisure uses; and
- offices.

F. Local Centres

Local Centres shown on the Key Diagram and Proposals Map at:

- Acorn Street;
- Ansty Road;
- Baginton Road;
- Barkers Butts Lane;
- Binley Road;
- Birmingham Road;
- Broad Park Road;
- Charter Avenue;
- Far Gosford Street;
- Green Lane;
- Hillfields;
- Holbrook Lane;
- Holyhead Road;
- Keresley Road;
- Longford;
- Quorn Way;
- Radford Road;
- Station Avenue;
- Sutton Avenue;
- Walsgrave Road;
- Willenhall;
- Winsford Avenue.

They will contain an appropriate scale of development for their immediate locality (around a 1km radius) for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses.

G. Well-established Local Shopping Parades

Well-established local shopping parades generally serve the immediate locality, primarily for "top-up" convenience shopping, limited services and limited small-scale food and drink uses.

Outside Centres

9.20

There are a variety of shops and services in the city which are not located in a defined centre. Centres are generally the focus for retail, service, and leisure uses. However, it is recognised that there is existing provision outside defined centres and whilst not the preferred location for shopping and associated leisure activities, there may be occasions when proposals for uses outside defined centres are considered suitable.

Policy SC2: Shops Outside Centres

A. Sequential Assessment

A sequential assessment will be required for proposals outside a defined centre and will be required to use the centres hierarchy as a method of assessing sequentially preferable sites.

The hierarchy is defined as:

- City Centre;
- Major District Centres;
- District Centres;
- Local Centres.

Additionally an assessment may be required of existing well established local shopping parades or small groups of local shops not defined in the centres hierarchy, which perform an important, convenience "top-up" role. It may be preferable to make a small-scale addition to an existing and well-established parade of shops, than to create a new individual shop or restaurant.

B. Impact Assessment

An assessment of the impact of a proposal on the vitality, viability, role and character of a defined centres and existing well established local shopping parades or small groups of local shops not defined in the centres hierarchy, which perform an important, convenience "top-up" role will be required for proposals over:

- 250sqm gross convenience retail; and
- 2,500sqm gross comparison retail.

All proposals outside centres will be expected to demonstrate that:

- the impact of the proposed development would not be harmful to the vitality, viability, role and character of existing centres;
- the development could not be accommodated in an existing centre of appropriate scale;
- the development would be compatible with other plan policies.

Ground Floor Units in defined centres

9.21

Within defined centres, proposals for non-retail uses at ground floor level and the prominence of the unit within a frontage will be important. The width of the unit and the proximity of other non-retail uses need to be considered, in order that a lively street frontage is maintained and the centre continues to have vitality.

Policy SC3: Ground Floor Units in defined centres

Proposals to use ground floor units within defined centres for appropriate non-retail uses will normally be permitted provided that:

- the primary retail function of the centre would not be undermined;
- the use would make a positive contribution to the overall role, vitality and viability of the centre; and
- the use is compatible with other Plan policies.

The impact of a proposal on the primary retail function on a centre will be determined on the basis of:

- the location and prominence of the unit within the relevant frontage;
- the width of the frontage of the unit;
- the number and proximity of other units occupied by non-retail uses; and
- compatibility of the proposal with nearby uses.

Restaurants, bars and Hot Food Takeaways

9.22

Food and drink uses in classes A3, A4 and A5 have the potential to cause significant problems with impact upon residential amenity, highways and parking. For a combination of these reasons, they will normally only be supported within defined centres (including Local Centres) and employment areas where residential amenity is less likely to be an issue and will be resisted elsewhere.

Policy: SC4 Restaurants, bars and Hot Food Takeaways

Outlets should be located within defined centres and employment areas will normally be discouraged outside those locations.

Proposals within defined centres will be permitted provided that they would:

- be compatible with neighbouring amenity, highway considerations and nearby uses;
- not cause harmful cumulative impact due to the existence of any existing or proposed outlet;
- in particular, proposals for A5 uses should be in accordance with the emerging Hot Food Takeaway Supplementary Planning Document, and
- the development would be compatible with other plan policies.

Local Community Facilities

9.23

The Council has a key role to play in:

- ensuring that there is a comprehensive network of its own facilities and services available to meet the needs of all members of the community, including the elderly, families with young children and persons with disabilities; and
- encouraging and supporting initiatives from the private sector and voluntary bodies or developing partnership arrangements where appropriate.

9.24

There are a wide range of 'local' community facilities which people can easily access through walking. This includes doctors' and dentists' surgeries, indoor sports facilities, community halls including those at places of worship, crèches and day nurseries, public houses and cafes/restaurants, and a wide variety of other facilities. Availability of these facilities helps to meet the diverse needs of existing and future residents and contributes to the development of sustainable neighbourhoods and communities. However, the scale of some facilities and the nature of their catchments, e.g. doctor's surgeries are such that they would be best provided within the network of centres and their inclusion in schemes for centres will be supported.

9.25

It is important to retain these sorts of facilities and services to maintain the attractiveness and sustainability of neighbourhoods and communities. The forthcoming Sports Strategy will provide more detail on the levels of provision for indoor and outdoor sport. Their loss will be resisted and any proposal will be considered on the basis of the criteria below.

Policy: SC5 Local Community Facilities

Community facilities that serve local needs should be located within or immediately adjacent to a defined centre. Where this is not possible, a location easily accessible to the local community by walking, cycling or public transport will be acceptable.

Development proposals that would result in the loss of sites, premises or facilities currently or last used for the provision of community facilities and/or services will be resisted

Their loss will only be accepted if:

- it can be demonstrated that the community use is no longer needed; or economically viable; or
- the type and level of provision is relocated within around 1km; or
- the development proposes the enhancement of existing community facilities within around 0.5km.

**Coventry Local Development
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Section 10

Accessibility

Core Strategy Submission Draft

Overview

10.1

A high quality and efficient transport network is essential to support the economic growth and prosperity of the city. Transport supports all types of new development and everyday activities, whether enabling access to work, healthcare or simply for leisure. Transport also has a significant influence on peoples' wellbeing and overall quality of life. Individual transport needs vary and therefore it is important to ensure that everyone who lives, works or visits the city can access a choice of transport modes and is able to make informed decisions about how they travel.

10.2

Coventry is well placed to support economic growth and can capitalise on a number of transport related 'unique selling points':

- It is centrally placed in the UK and is very well connected to international, national and regional road, rail and air networks, providing rapid access to London, Birmingham and key European destinations.
- It is a compact city with a permeable road network with comparatively low levels of congestion.

10.3

Maintaining and building on these is critical to the future regeneration and growth of the city. Particularly important is protecting and enhancing Coventry's excellent rail connectivity to London and the south. A major asset within the highway network which must also be protected is the city centre ring road, which enables the quality of the city centre environment to be maintained and prioritised for economic, retail and leisure activity.

10.4

Coventry serves an active and prosperous Local Enterprise Partnership (LEP) area, both as a transport and economic hub with strong interactions with both the Birmingham conurbation in the West Midlands and growth areas in East Midlands such as Leicester, Leicestershire, Daventry and Corby. Strengthening accessibility within the city is a key part of the Core Strategy and is essential to support the planned growth. This is underpinned by a wider objective to strengthen accessibility across the LEP area and with neighbouring LEP areas in the West and East Midlands.

10.5

Whilst Coventry's transport network has the ability to accommodate some growth, there are also some key challenges to address:

- Development of the city over the past thirty years has resulted in a number of major trip attractors being located on the edge of the city, which in some cases has resulted in poor levels of accessibility and a high reliance on access by car.
- The transport infrastructure investments required are relatively few, but essential to support continued growth of both the resident economy and new development. Failure to deliver this investment has potential to limit growth by restricting the accessibility between key areas within the city and to the strategic transport network

10.6

Central to the infrastructure requirements is an improved high quality public transport offer which directly serves growth areas and existing centres of economic activity. A major component of this is the creation of a high quality rapid transit core network that links major trip generators in edge of city locations to the city centre and to each other. This 'step-change' in provision will improve accessibility and travel choices whilst also reducing pressure on the highway network.

10.7

The compact and permeable layout of the city provides potential for a high proportion of trips to be made by walking and cycling. A programme of investment across the city and particularly in the city centre has ensured facilities for pedestrians are generally good, although more needs to be done to improve equality of access for the mobility impaired. The generally flat and compact nature of the city supports comparatively high levels of cycling; however, dedicated specific facilities are limited.

10.8

An enhanced public transport, walking and cycling offer in the city, together with targeted investments in the highway network will enable the capacity of the transport network to be maintained so that it can continue to support economic growth and regeneration.

Policy Context

West Midlands Local Transport Plan 3 (LTP3)

10.9

The current West Midlands Local Transport Plan, known as LTP3, sets out a transport strategy for the West Midlands Metropolitan area. The objectives which the LTP sets out to address are:

- Economy
- Climate change
- Health, personal security and safety
- Equality of opportunity
- Quality of life and the local environment

Coventry and Warwickshire Local Enterprise Partnership

10.10

The objective of the Local Enterprise Partnership (LEP) is to strengthen private/public partnership working to help drive economic growth. The emerging transport objectives of the Coventry and Warwickshire LEP are:

- Strengthen the North-South Corridor [*the transport corridor linking North Warwickshire-Coventry-South Warwickshire*];
- Improve the strategic highway corridors;
- Increase passenger capacity on the West Coast Main Line;
- Increase rail freight capacity serving the LEP area;
- Fast and efficient access to passenger and freight air hubs; and

- Improve accessibility to key destinations by sustainable transport

Coventry Transport Strategy

10.11

The Coventry Transport Strategy will set out clear and detailed policies for all modes of transport to guide local decision making. The strategy brings together a range of planning, transportation and corporate policies in order to provide a single clear direction and approach to addressing the overarching transport needs of the city. The strategy will build on policies contained in LTP3 and apply them in a local context whilst reflecting the Core Strategy Hub and Spoke development principles. The strategy will be supported by a series of Transport Delivery Plans which set out transport improvements in major development areas and along key transport corridors. A Coventry Transport Strategy Supplementary Planning Document (SPD) based on the overarching strategy will draw out the relevant planning aspects in order to expand upon the Core Strategy transport policies.

10.12

The evidence base for the Coventry Transport Strategy indicates that within Coventry:

- A very strong cross boundary commuting and business travel relationship exists with North and South Warwickshire and, to a lesser extent, the Birmingham-Solihull conurbation, Leicestershire and the East Midlands.
- Road congestion is relatively low, but does exist during peak hours on radial corridors and junctions, and around some key attractors.
- The overall level of road traffic mileage within Coventry has reduced over recent years.
- The majority of work related car trips are short at less than 5km, and a high proportion of these are less than 2 km.
- Levels of walking and cycling into the city centre are steadily increasing.
- Since 1997 the number of trips by rail into the city centre has doubled, trips by car have remained at similar levels and trips by bus, after a steady decrease, are now increasing.
- Bus coverage in urban areas is wide spread, but inadequate at some peripheral employment sites and in some residential areas.
- The number of road traffic accidents has continued to decrease.
- Car ownership is significantly lower than the UK average in some areas.
- There is sufficient car parking capacity in the city centre, but a need to improve the quality and accessibility.

10.13

The Coventry Delivering a Sustainable Transport System study (DaSTS) 2010 identified a strong north-south corridor between south and north Warwickshire through Coventry. The DaSTS study demonstrated that a high proportion (78.7%) of all employed residents who live in the corridor also work within the corridor boundaries (see Figure 1):

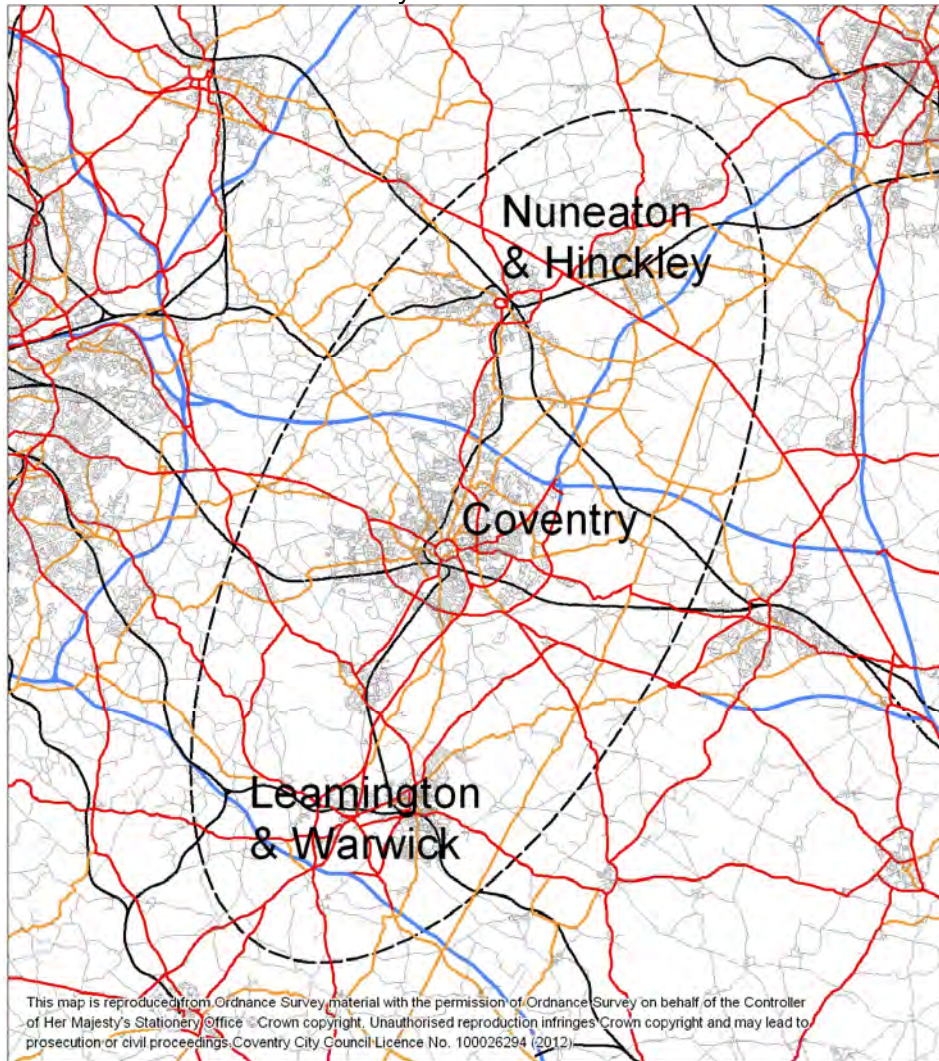
- 75% of active workers within Coventry also work within the city.
- 66% of the jobs in Coventry are occupied by people who also live within the city, therefore indicating quite a high proportion (34%) of jobs are filled by people who commute into the city.

- There is a net commuting inflow of workers into Coventry of nearly 17,000, made up of 49,000 workers commuting in and 32,000 commuting out.
- The bulk of the inward commuting stems from Nuneaton and Bedworth and to a lesser extent, although still significant, Warwick, Leamington, Rugby, the East Midlands, Birmingham and Solihull.

10.14

This emphasises the need for transport improvements to be focused on local network enhancements within the Coventry and Warwickshire area.

Figure 1 – DaSTS Corridor Boundary



Accessibility Constraints and Opportunities

10.15

The proposed Hub and Spoke approach provides excellent opportunities to create high levels of accessibility, and is consistent with the transport objectives in the National Planning Policy Framework.

10.16

These advantages include:

- Homes will be built near where people work, hence will reduce the distances people need to travel, therefore reducing carbon output.
- It will make sustainable travel options such as walking and cycling more realistic options for many local trips resulting in improved air quality and reducing carbon emissions and congestion.
- Development will be focused in the most accessible locations to make it as easy as possible for people to get to work, shop and use leisure facilities.
- Higher density development will help support the viability of public transport services.

10.17

There are several edge-of-city employment sites within Coventry which are relatively inaccessible, other than by car. This issue is exacerbated by a predominantly radial bus network which focuses on access to the city centre, without supporting the demand for orbital trips and cross-city trips required to access peripheral employment sites. It is clear that a step change is required to remedy this problem, and it is considered that the development of a high quality rapid transit system is an essential solution.

10.18

The City Council's economic Jobs Strategy identifies opportunities to create new jobs through the development of a high technology low carbon economy. Coventry has already established itself as a test bed for low carbon vehicles through the "Cabled" electric car project and the introduction of electric buses on Park and Ride South. Established links with the car manufacturing sector and Coventry's two universities offers a unique opportunity to develop a low carbon transport technology industry which could support increased jobs and provide the opportunity to develop a truly sustainable and efficient transport network. This needs to be reflected in the supporting infrastructure provided within new developments.

10.19

For the proposed economic growth to be realised, local people must have good access to the jobs and services they need. Realistically this can only be achieved if the transport network offers a wide ranging choice of convenient & reliable transport modes which meet the needs of the varying types of trips which people need to make.

- **Local trips** - within and between local neighbourhoods, employment and retail area e.g. Walking, Cycling and Bus
- **City trips** – Citywide and some cross boundary e.g. cycling, bus, rapid transit, rail, car (including Park & Ride)
- **Longer distance trips** – Cross-boundary and inter-region e.g. car, rail, air.

10.20

For short local trips to amenities such as to schools and local shops, walking, cycling and public transport should be developed to the point of being the most attractive modes of travel. These modes are more feasible for shorter journeys as well as being more sustainable in terms of reducing local congestion, improving air quality, reducing carbon emissions and have added health benefits.

10.21

Local accessibility improvements for walking and cycling and bus services can be identified and delivered on a needs basis, linked to new development proposals and funded as appropriate.

10.22

The investment required in the transport network to ensure city wide and longer distance journeys remain efficient and reliable is more strategic in nature. Investment in a rapid transit network which links major trip attractors and investment in targeted highway pinch points will benefit multiple development 'spokes' and support the existing resident economic activity. Funding to support the necessary investment will need to be drawn from multiple sources and pooled to achieve best overall impact. New development proposals must address both their own immediate impacts and interaction with the wider transport network.

10.23

In order to ensure opportunities for travel are equitably available, the needs of everyone in the community should be considered, including those with physical and sensory disabilities, people with special needs, as well as the elderly and children. The needs of these groups must be considered and accommodated where possible within new development proposals and associated transport infrastructure. The aim should be to provide travel choice in order to promote independent travel, e.g. the provision of dropped kerbs with tactile paving to enable larger elements of a journey to be pedestrian or wheel chair based rather than relying solely on provided services such as 'Ring & Ride' or taxi services.

Policy Acc 1: Accessible Transport Network

- a. To create an environment which encourages sustainable and active transport choices for local journeys, proposals for new development should be focused within the Hub and Spokes and other accessible locations which have good existing transport links by a range of sustainable and active travel modes. Major developments should contain a mix of uses to help minimise the need for, and distance that, people travel.
- b. New development must achieve high levels of transport accessibility and integration across the city and into the wider sub region. This will be achieved through the development of a high quality and integrated transport network which links together the Hub, Spokes and other major trip attractors on radial and orbital routes.
- c. Where appropriate, new development should make provision for the application of new technologies which promote carbon reduction such as electric vehicles and charging points.
- d. New development proposals should consider the transport and accessibility needs of disabled people, children, the elderly and people with special needs.

Highway Network

10.24

Total vehicle mileage on Coventry's roads has steadily declined. This appears to be because of a combination of factors, including the fact that more people are choosing to travel by walking, cycling and by bus for local journeys and because of a decline in a number of major industrial land uses. Overall levels of road traffic congestion reflect this fact and remain comparatively low for a large but compact city.

10.25

A comprehensive appraisal carried out to assess the impact of the planned Core Strategy development proposals on the highway network up to 2028 indicates that the highway network will generally cope well with the additional pressures placed upon it. Nevertheless, stress would be likely to occur on a number of key corridors, junctions and orbital routes and these are shown in Figure 2. If all Core Strategy development proposals are delivered within the plan period, the overall number of car trips on the road network is expected to increase by 13% in the AM peak period and PM 11.4% peak period by 2028.

10.26

The worst affected corridors are:

- A45 corridor, including the junctions with B4101 Tile Hill Lane, Broad Lane, A429 Kenilworth Road and B4113 St Martin's Road.
- A444 corridor, including junctions with B4113 Foleshill Road, and B4109 Stoney Stanton Road.

Sections of the A4600 Walsgrave Road, B4106 Allesley Old Road and B4113 Leamington Road would also, but to a lesser extent, be affected.

Other import capacity constraints have been identified on orbital routes:

- A46 corridor, including the junction with Brandon Road
- The city centre ring road
- Allard Way at its junction with Binley Road
- Queensland Avenue

10.27

Maintaining and increasing capacity in these locations is vital in order to ensure that cross city, cross boundary and longer distant connectivity for existing and new economic activity is supported.

10.28

The development of the Friargate area, major regeneration of the Southern Precinct retail area and on-going re-development across the city centre will focus pressure on the ring road, partly as result of additional traffic, but also because of the re-prioritisation of road space required to enable high quality pedestrian and public transport accessibility. Whilst this can be accommodated, it will change trip making behaviour and change the balance of use between different junctions on the ring road. Infrastructure works will be required to accommodate these changing pressures and allow the inherently flexible asset provided by having a complete and continuous ring road to be utilised to best effect.

10.29

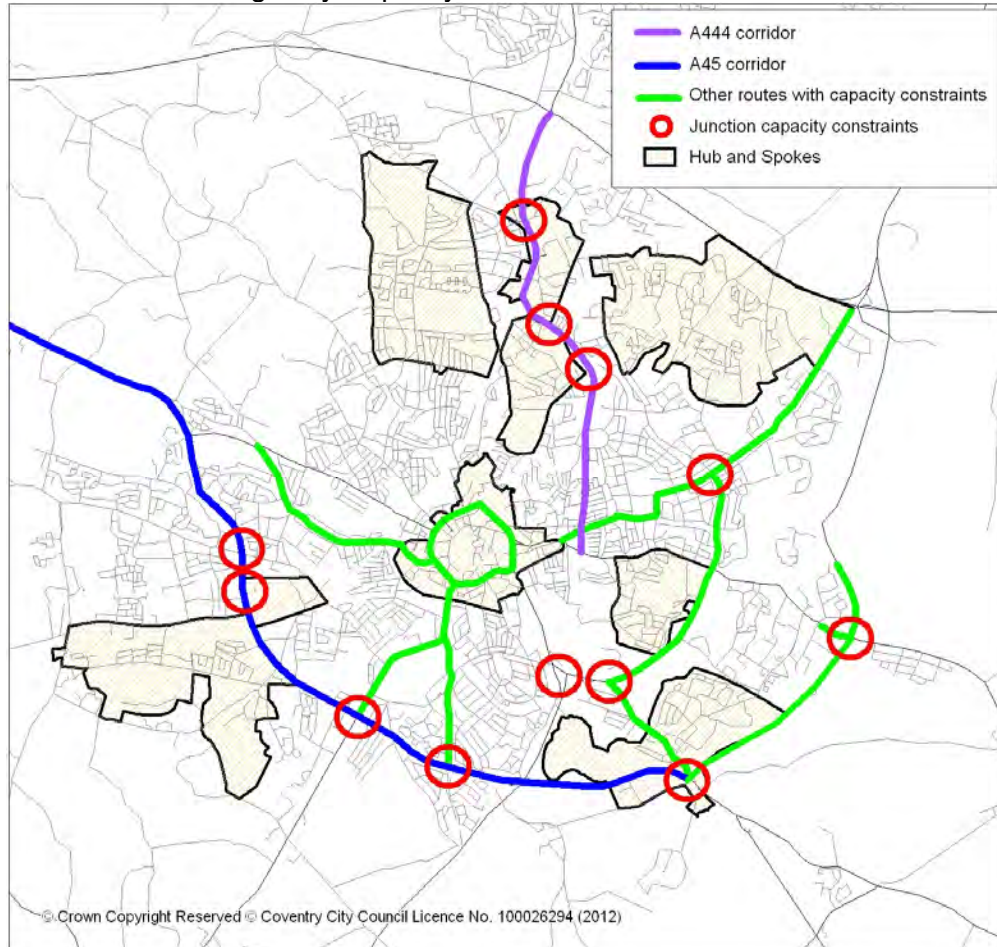
Similarly the A46 / A45 corridor forms part of a vital outer orbital corridor that enables rapid access to the strategic highway network. The effective operation of this is

critical to maintaining Coventry's connectivity and accessibility. Development pressures across the Coventry and Warwickshire LEP area, within Coventry and at the Coventry & Warwickshire Gateway site will place additional stress on this corridor which will require infrastructure improvements.

10.30

At a more localised level, the network around some major trip attractors will also show some signs of increased congestion, particularly the University Hospital Coventry and Warwickshire and the University of Warwick.

Figure 2 – Potential Highway Capacity Constraints



10.31

Current LTP3 targets aim to limit traffic growth to no more than 6% by 2015 and maintain levels of congestion at not more than current levels up to 2015/16. The modelling work indicates that levels of traffic growth would keep within this target, but nevertheless congestion may increase during the full plan period, and therefore some mitigation measures will be required.

10.32

LTP3 recommends that the best use is made of the existing highway network through the use of demand management and new technologies. Although demand management is likely to be sufficient to address many of the potential network capacity issues, this alone may not be sufficient to mitigate against all increases in congestion. The application of additional targeted transport interventions will be required to address any residual congestion to constrain delay times similar to current levels.

10.33

A balanced package of measures is required, including:

- Targeted highway improvements – particularly at key junctions
- Public transport improvements – focused on mass transit, rail and improvements to improve interchange between modes / services.
- Smarter Choices initiatives – such as walking, cycling, car sharing information and communications technology

10.34

The Infrastructure Delivery Plan sets out the measures which are considered to be essential to support the successful delivery of the Core Strategy. It is estimated that the application of all measures in the Infrastructure Delivery Plan would constrain traffic growth to around 10% during the AM peak and a 7% increase in PM peak by 2028.

10.35

The provision of public transport improvements and smarter choices initiatives not only helps reduce traffic growth, but enables an overall increase in trip making as more choice and travel options enable travel activity which may not have otherwise occurred.

10.36

With the delivery of the Infrastructure Delivery Plan measures the predicted level of increase in traffic is considered to be a manageable. The overall uplift in journey making across car and public transport modes is indicative of the much improved connectivity which can be achieved and which will support increased economic growth and activity.

Policy Acc 2: Network Capacity

Development proposals in the Core Strategy are likely to result in increases in traffic growth which will constrain growth and activity:

- a. Development proposals which have a significant negative impact on transport network in the immediate vicinity of that development will be required to mitigate those impacts; firstly through demand management measures; and secondly through appropriate Section 106 or/and Section 278 funded schemes
- b. The Infrastructure Delivery Plan sets out specific measures and funding sources for transport network improvements which are required to support the delivery of the Core Strategy. The level of contribution new development will be required to make towards these measures is set out in the Community Infrastructure Levy.
- c. Other transportation proposals supporting the economic development and regeneration of the city will be set out in the Coventry Transport Strategy SPD.

Network and Demand Management

10.37

The management of journeys on the local transport network will be essential to maintain journey time reliability as the number of jobs and the associated number of trips in the city increases. Coventry's highway network generally has a high level of resilience and copes well with peak flows and traffic incidents.

10.38

Projects such as the ongoing development of the Urban Traffic Management Control (UTMC) system and application of Intelligent Transport System (ITS) technologies will continue to be used to manage traffic on the highway network. However, measures must also be put in place to encourage people to make their journeys by the most appropriate mode of transport available to minimise unnecessary car journeys in the first place.

Transport Assessments

10.39

New developments will need to be considered on a case by case basis to assess the anticipated levels of traffic generated and the impact this would have on local congestion and accessibility.

10.40

Transport Assessments will be required for larger developments which create significant additional trips on the network, and these will be used to determine the severity of the impact, and the appropriate level of mitigation measures required.

10.41

A sequential approach will be used to assess and then manage the impact of new developments. The objective of this approach is to encourage economic development without implementing unnecessary highway measures. A plan - monitor - manage approach will ensure that mitigation measures are only applied where evidence demonstrates they are necessary.

Travel Plans

10.42

Travel Plans are essential to encourage sustainable transport and manage traffic generation for trip attractors such as local businesses, schools, universities, hospitals, railway stations and new residential developments. They are the first step in mitigating transport related issues before implementing physical infrastructure measures. Travel Plans should be updated regularly and monitored to maximise their effectiveness against agreed objectives and targets. Where applicable, these should be closely linked to and act as a monitoring tool and action plan to support Transport Assessments.

Car Parking

10.43

The provision of appropriate levels of Private Non-Residential car parking to support new developments will be important to help manage traffic, minimise the potential for congestion, prevent excessive inappropriate informal parking and encourage sustainable transport modes. Locally determined standards will be developed based on the accessibility and type of development proposal. Standards will include appropriate provision to support electric cars and car sharing.

10.44

The overall quantum of public parking supply in the city is expected to be broadly sufficient to serve the needs of the Core Strategy development. However, the quality, location and type of provision will need reviewing and improving during the period up to 2028. A critical factor in the overall management of parking supply across the city will be to ensure that public parking provision can be provided on an economically sustainable basis, whilst also supporting sustainable travel choices and economic growth.

10.45

Park and Ride forms part of the overall car parking infrastructure serving the city. There are currently two bus based Park and Ride sites in operation which serve the north and south of the city. These form a part of the city centre car parking supply, but mitigate the need for the whole journey to be made by car by intercepting journeys before they reach the city centre. Where financially viable the existing Park and Ride sites will continue to be maintained and enhanced. Opportunities for further Park & Ride provision will be considered.

10.46

The priority will be to continue to improve the quality and access to existing city centre car parking stock to support business and retail investment in the city centre.

Policy Acc 3: Demand Management

- a. Transport Assessments will be required for developments which create significant increases in trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Transport Strategy SPD.
- b. Travel Plans will be required for new developments which generate additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Transport Strategy SPD.
- c. Local car parking standards for new development will be set out in the Transport Strategy SPD and will be based on accessibility standards and local need.
- d. Additional parking provision will be considered and supported where need and viability can be clearly demonstrated.
- e. New development proposals requiring change to the highway network will be required to integrate with any existing Intelligent Transport System (ITS) infrastructure and strategy, as set out in the Coventry Transport Strategy SPD.

Modal Policies

10.47

To create an accessible city which supports economic activity, people must have access to a range of modes of travel which support their individual needs. The following section sets out a series of modal policies which will support this proposal.

Walking and Cycling

10.48

Walking and cycling offers many benefits as both activities are cost effective, have physical and mental health benefits, are low carbon and do not add to levels of congestion and air pollution. The compact and relatively flat topography of Coventry makes walking and cycling a practical mode of travel for many local journeys. Although it is difficult to measure precise local levels of walking and cycle usage, the various sources of evidence indicate that walking and cycling activity is increasing.

10.49

Walking and cycling, routes should be direct, safe, well lit, continuous and convenient to maximise their attractiveness. Therefore provision for these modes must be considered early in the design process to ensure that their specific needs are carefully considered and catered for.

Cycling

10.50

To support and encourage cycling for local trips, all new developments must provide safe and direct links into the Coventry cycle network which aims to provide high quality seamless route choices for cyclists. The cycle network will be defined in the Coventry Transport Strategy SPD.

10.51

The City Council has adopted a hierarchy of provision which can be applied to determine the most suitable type of cycle facility. This approach favours reductions in the volume and speed of traffic, usually 20mph, and shared environments rather than default provision of providing segregated cycle lanes. Dedicated cycle lanes may however be required on routes where higher speeds and/or levels of traffic are expected such as major radial routes and busy access roads. Other supporting measures such as advanced stop lines, directional signage and lighting are an important part of the network and will be expected to be integrated into all major development proposals. Cycle parking is an essential part of supporting the needs of cyclists and must be catered for.

10.52

The Coventry Transport Strategy SPD will set out more detailed guidance on cycle route provision and cycle parking standards.

Walking

10.53

In addition to being healthy and sustainable, it is the cheapest and most accessible mode of transport and forms at least part of every journey. All new developments

must include direct, convenient and safe pedestrian routes through and to each site which link to the existing pedestrian route network.

10.54

The level of provision should be determined based on the expected level and speed of traffic and the location and type of development proposal. In many circumstances off-carriageway footways will generally be the preferred option. However, in quiet residential areas, within the city centre and areas where the ratio of pedestrians to traffic is high it may be appropriate to have measures such as pedestrianisation or shared pedestrian / vehicle surfaces which encourage higher levels of interaction between different highway users. On more heavily trafficked routes, pedestrian priority measures such as formal crossing points will be required to make walking as safe and convenient as possible.

Policy Acc 4: Walking and Cycling

All development must incorporate safe and convenient access to appropriate walking and cycling routes. Where these links do not exist, new routes will be required within new developments and these must link into existing established networks to ensure that routes are convenient and continuous. The expected level of provision will depend on the use and location of the site

Further details will be set out in the Coventry Transport Strategy SPD.

Public Transport

Bus Services and Infrastructure

10.55

Buses offer a realistic modal choice for many local trips, and particularly those into the city centre. Coverage across the city is generally good although there are examples of where service frequencies are inadequate to provide an attractive and realistic option such as in rural areas and edge of town employment sites. The bus network largely follows the radial network of roads across the city and whilst this supports good access to the city centre, it does not support the demand for orbital trips such as those between residential and employment sites.

10.56

The principles of the Hub and Spoke approach will mean that many developments will already be served by existing local bus services. Where required, Transport Assessments will be required to assess the adequacy of provision in more detail.

10.57

Major development sites, such as those which create significant extra trips or require new road infrastructure, will require the provision of new bus infrastructure to allow bus services to be fully integrated within the site.

Interchange, Information & Ticketing

10.58

One of the major barriers to journeys by public transport is the need to switch between different services & modes, often paying separately each time at the point of use and often without prior knowledge of when and where the next service will be. A step change in the level of public transport provision must be supported by complementary measures to:

- Improve the ease of access to interchange facilities and to the quality of the waiting environment within them
- Provide quality and timely information that can reduce uncertainty for travellers
- Make payment quick and convenient through ticketing systems which work across all modes and services.

Rapid Transit

10.59

Rapid transit systems are rail or bus based transport networks which provide high quality, fast, frequent reliable and usually limited stop services between major trip attractors. Over time bus based services have potential to develop into light rail based services.

10.60

To support jobs-led growth in the city, it is apparent that the current public transport network will not be adequate to deal the additional demands and meet the expectations of modern business sector. Whilst the highway network can cope with much of the expected additional demand, in order to manage congestion to acceptable levels and maintain network resilience, additional public transport provision will be required.

10.61

A network of rapid transit routes is required that link together the Hub, Spokes and major trip attractors across the city. As well as supporting existing employment sites, it can also be a way of unlocking the potential of the Spokes and edge of city development sites where accessibility is an issue. The high quality, fast and reliable nature of rapid transit increases the viability and attractiveness of services and offers a realistic alternative to local car journeys.

10.62

Major trip generators such as Ansty Park, Coventry Airport, the Universities and the Hospital must be a priority for the provision of high quality rapid transit services. The identification and feasibility of individual routes will be subject to further study and delivered through the Core Strategy, Coventry Transport Strategy and LTP3.

Policy Acc 5: Bus and Rapid Transit

- a. All new developments must have safe and convenient access to the existing bus network. Where required this should include the provision of appropriate bus infrastructure to support this. The level of need and expected provision will be informed through Transport Assessments and Travel Plans.

- b. Where deemed appropriate, the development of a mass rapid transit network will be supported to improve accessibility to major trip attractors, support regeneration proposals, and help unlock new development potential.

Further details will be set out in the Coventry Transport Strategy SPD, Community Infrastructure Levy and LTP3.

Rail Services

10.63

Coventry Station is generally well served by local, regional and long distance rail services on the West Coast Main Line (WCML) and by Cross Country services. However, specific areas, notably the north and east of the city, are poorly serviced by local rail services. Rail patronage in Coventry has doubled since 1997 with around 2000 passengers now entering the city centre each day during the morning peak period.

10.64

There is an excellent range of fast rail services to London and the south which are important to the economy of the city, supporting both existing activity and future development. The high level of connectivity must be protected and further developed.

10.65

Rail services to North and South Warwickshire and the East Midlands are more limited and are constrained by capacity issues at Coventry Station and at Nuneaton Station. Line capacity between Coventry and Birmingham is also constrained which causes competition between fast long distance and local services. It is clear that major infrastructure improvements will be required to meet the growing demands to support the growth of the city. It is anticipated that this rail link will reach capacity within the Rail Industry's Control Period 5 (2014-2019) and a combination of track, signalling, platform and train capacity enhancements are required to address this.

10.66

Coventry Station is located on the southern edge of city centre so good links between it and the core city centre are essential to support its viability. The station will be located at the heart of the proposed Friargate redevelopment and is an important part of the offer of the scheme. The area around the station can become congested during peak periods and the current bus-rail interchange, taxi and car drop off and cycle facilities are generally inadequate and require a comprehensive improvement.

10.67

Stations at Tile Hill and Canley currently cater for local rail services, predominantly serving demand between Coventry and Birmingham. Tile Hill does however offer some longer distance journey options as far as London. Both stations also act as rail Park and Ride facilities, and although the car parks have been expanded to meet growing demand, they continue to operate at, or near capacity. The high levels of car access could in part be attributed to the poor integration of bus services and lack of good pedestrian and cycle links to these stations. Additional local rail stations on this line to the east of the city serving Willenhall and Binley would allow some of the strong local rail service demand to be met and support the regeneration and economic growth of this part of the city.

10.68

To support the large north-south corridor movements identified in the Coventry DaSTS study, it is proposed to deliver improved local rail services through the Nuneaton, Coventry, Kenilworth, Leamington (NUCKLE) rail scheme. Phase 1 of the scheme includes an improved link and services between Nuneaton and Coventry. The full scheme will improve links into South Warwickshire and north through Nuneaton to Leicester. A new station at Arena Park will support improved links between the city centre Hub and the Foleshill Spoke which are key development areas. There are opportunities for further local stations and additional capacity enhancements in the longer term.

Policy Acc 6: Rail

- a. Proposals which improve access to rail services will generally be supported. This includes:
 1. Improved access to rail stations by all modes of travel.
 2. Improved interchange facilities between rail and other modes.
 3. Enhancements which support improved frequency and the quality of rail services.
- b. Enhanced direct rail services and supporting rail infrastructure on the North-South corridor from South Warwickshire through Leamington, Kenilworth, Coventry, Bedworth, Nuneaton and North on to Leicestershire and Leicester will be supported.
- c. Proposals which support improved rail access from Coventry to London and the south will be supported.
- d. Proposals for further local rail stations and services on the East-West rail corridor through Coventry will be supported.

Further details are set out in the Coventry Transport Strategy SPD and Community Infrastructure Levy.

Freight

Road Freight

10.69

The efficient movement of freight is an essential part of supporting economic growth. Journey time reliability for heavy goods vehicles (HGV's) has remained consistent year-on-year within the city. In addition to supporting existing businesses, this could provide opportunities to generate additional employment through the creation and promotion of logistical and freight industries. The central location of Coventry and the high level of access to the Primary Route network strengthens this opportunity.

10.70

The use of inappropriate roads by large freight vehicles can create hazards for both road users and local residents. To help manage freight movements clear dedicated

HGV signage will be provided. These will seek to encourage HGV's to use the highway network appropriately to minimise safety, noise and congestion issues.

10.71

On-street lorry parking, particularly around major employment and distribution sites, can create highway safety issues. These issues arise through a combination of factors such as specific delivery slots resulting in vehicles waiting on-street, and a lack of dedicated onsite HGV parking. Where new developments require large lorry movements, facilities must be provided onsite to minimise disruption on the public highway.

Rail Freight

10.72

Rail freight will continue to be encouraged through the dedicated facility located at Prologis Park in the north of the city. There is currently limited scope for additional rail freight access within the city. Opportunities for additional facilities which arise within the plan period will generally be supported, but will need to be assessed on their individual merit.

Air Freight

10.73

The role and usage of Coventry airport has fluctuated over time but it continues to cater for business/general aviation, air mail, bulk freight and other niche functions. Having good local access to air freight facilities offers opportunities to improve supply chains and therefore attract new investment into the area.

Policy Acc 7: Freight

- a. New developments must accommodate sufficient onsite lorry parking and turning facilities to minimise disruption and overnight lorry parking on the public highway.
- b. The use of rail freight and associated facilities will generally be supported.

**Coventry Local Development
Plan**

Section 11

**Green Belt, Heritage and
Urban & Landscape Design**

Core Strategy Submission Draft

11.1

This chapter sets out the Council's strategy to deliver environmental quality within the city. It establishes the approach to how our varied built, historic and natural environment will be maintained, protected and enhanced, while presenting opportunities to create more sustainable development and patterns of growth that will help the city to adapt to climate change.

Green Belt

Existing Guidance
National Policy Guidance
Natural Environment and Rural Communities (NERC) Act 2006 National Planning Policy Framework (NPPF) 2012. This maintains the principles that were enshrined within PPG2 (Green Belts)
Relevant Evidence Base
Coventry & Warwickshire Sub-Regional Green Belt Study 2009 Etc

11.2

The most important attribute of Green Belts is their openness. In Coventry, the Green Belt has four main purposes, to:

- check the unrestricted sprawl of the city;
- prevent Coventry from merging with neighbouring towns and cities of Birmingham (including the Meriden Gap), Kenilworth, Bedworth and Rugby;
- assist in safeguarding the city's Ancient Arden countryside and green wedges from encroachment; and
- assist in urban regeneration, by encouraging the recycling of derelict and other previously-developed urban land.

11.3

The use of land in Coventry's Green Belt also has a positive role to play in fulfilling the following objectives, through active countryside management:

- Retaining land in agriculture, forestry, and related open uses;
- Providing access to the open countryside and green wedges for the urban population, linked to the surrounding countryside of Warwickshire and Solihull;
- Providing opportunities for outdoor sport and outdoor recreation near urban areas;
- Protecting and enhancing attractive landscapes, including the Ancient Arden landscape and green wedges, and landscapes near to where people live;
- Securing biodiversity and nature conservation interests; and
- Improving damaged and despoiled land

11.4

The city has two distinctive types of Green Belt – the open countryside of Ancient Arden on its western boundary, predominantly used for agriculture and quiet, passive leisure; and green wedges, which are extensive and continuous tracts of open land that extend through the built-up area of the city, to and from the countryside beyond. The Council's Ancient Arden Design Guidelines will be applied in order to protect the visual amenities, local distinctiveness, openness and rural character of the Green Belt. The green wedges have particular value in maintaining openness and

environmental quality within urban areas, assisting nature conservation and providing people with access to the open countryside around the city by walking and cycling.

11.5

Historically, the development of Coventry has occasionally led to industrial and commercial buildings being constructed within areas now designated as Green Belt. Although it may be preferable, it is sometimes unviable for such sites to be redeveloped for more appropriate Green Belt uses. Rather than seeing them become neglected, and to protect the employment land portfolio, the opportunity will be taken to improve their impact on the Green Belt.

11.6

To that end, an assessment of the Green Belt has concluded that the sites listed in Policy GB1 below present significant opportunities to improve the Green Belt. The Green Belt boundary is therefore amended to enable sensitive, appropriate development of these sites. These are identified on the Core Strategy Proposals Map, and in detail on the inset maps at Appendix 5.

Proposed new Green Belt

11.7

The 2001 Coventry Development Plan included provision for land north of the former Jaguar factory at Browns Lane to be de-designated from the Green Belt to enable it to accommodate development directly associated with Jaguar Cars. In the event that the land was not required to be developed by Jaguar Cars, it was to be re-instated as Green Belt land. Following the closure of the factory in 2010, the land is no longer required for its extension and will be re-designated as Green belt land. It forms part of the Coundon Wedge Green Belt and Ancient Arden landscape.

Policy GB1: Green Belt

Inappropriate development will not be permitted in the Green Belt, and the visual amenities must not be harmed by reason of siting, materials or design.

The Green Belt boundary will be realigned at the following sites:

- Land West of Petitor Crescent (Part of NDC Regeneration Scheme);
- Former Power Station site, Alderman's Green;
- Land east of Lucerne Close;
- Land rear of Jephson Court, Alderman's Green Road;
- Industrial Land off Alderman's Green Road;
- Sherbourne Fields School;
- Land at Westwood School and Technology College;
- Land at Poundgate Lane and Guinea Crescent; and
- Caludon Castle School;

Green Belt designation is proposed at Coundon Wedge land North of the former Jaguar Factory, Browns Lane.

Policy GB2: Industrial or Commercial Buildings in the Green Belt

The redevelopment, extension, or other alteration of existing industrial or commercial buildings in the Green Belt for industrial, commercial or associated uses, may be considered to be appropriate development if the overall impact of the development on the openness, appearance and character of the Green Belt is improved. A proposal will not be regarded as appropriate if:

- The area occupied by built development is enlarged;
- The height of existing buildings is exceeded;
- The use and associated activities are materially intensified;
- The total gross floorspace is significantly increased; or
- A high quality of design, materials and landscaping is not achieved.

Heritage

Evidence base

The Coventry Historic Environment Record

The Coventry Local List

The Coventry Historic Landscape Characterisation Project

The Gould Report on the 20th century City Centre

The Arden Design Guidance

Conservation Area Appraisals

Introduction

11.8

Coventry has a rich and diverse historic environment which is evident in the survival of individual historic assets and in the local character and distinctiveness of the broader landscape. Prehistoric flint tools which have been collected from fields around the city demonstrate that there has been human activity in the Coventry area since at least the Mesolithic period, some 10,000 years ago. The landscapes and buildings that can be seen today date predominantly from the medieval period onwards when Coventry grew from a small Saxon settlement to become one of the principal cities of medieval England. The wealth of the medieval city peaked in the 15th century and was followed by a slow economic decline that saw Coventry stagnant until a second period of dramatic expansion occurred in the late 19th century with the emergence of industries such as ribbon weaving and watch making. Twentieth century Coventry became a major centre for manufacturing and the city grew rapidly with factories and housing expanding over the previously rural landscape absorbing many of the surrounding villages and farms. The concentration

of industry in Coventry resulted in it suffering from extensive bombing during World War II, causing significant damage to the fabric of the city. However the wartime destruction was followed by an era of extensive reconstruction with innovative architecture and design in the 1950s and 60s.

11.9

Coventry has over 400 Listed Buildings ranging from the medieval St Mary's Guild Hall to the 1960s railway station that have been selected by the government as being of national interest. In addition over 500 buildings have been selected by the City Council for Local Listing due to their importance to Coventry. The city also has 15 Conservation Areas, 20 Scheduled Ancient Monuments, 2 Registered Parks and Gardens and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record.

Policy HE1: Conservation and Heritage Assets

In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance, these Heritage Assets include;

- Listed Buildings and Locally Listed buildings
- Conservation Areas
- Scheduled Monuments and Archaeological sites
- Registered Parks & Gardens
- Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record

Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance in an accompanying Design and Access Statement or Heritage Statement using currently available evidence.

Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.

The re-use of historic buildings contributes to sustainability by harnessing their embodied energy. Sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk.

Demolition or destruction of heritage assets will usually be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage.

All proposals should aim to sustain and reinforce special character and conserve the

following distinctive historic elements of Coventry:

- The surviving buildings, defences and street plan of the medieval city centre and its suburbs;
- The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Little Heath and Lower Eastern Green;
- The wider Arden rural environment on the fringe of the City comprising field-systems, woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;
- Buildings associated with the city's industrial heritage; ribbon weaving, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;
- The Victorian and Edwardian suburbs such as Earlsdon;
- Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;
- Coventry's groundbreaking post-war reconstruction including its town plan, built form, art works and public spaces; and
- Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period.

Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.

11.10

The policy will be implemented through the Development Management process. Where it is felt necessary, the Council will propose buildings for Listing by national government and will also continue to maintain an up-to-date Local List. The Council will work with property owners to reduce the number of heritage assets in Coventry that are deemed to be at risk. Appraisals and management plans will be produced for all of the city's conservation areas to guide their preservation and enhancement. The Council will also investigate the potential for designating new conservation areas and for reviewing the boundaries of existing conservation areas. The Council will continue to maintain an up-to-date and accessible Historic Environment Record as the principal evidence base on the city's Historic Environment. Historic Landscape Characterisation and the Arden Design Guidance will be used to inform decisions on historic character and local distinctiveness.

Urban & Landscape Design

11.11

A high quality environment is essential to achieving sustainable development and contributes to the economic life of a city as an essential part of any successful regeneration strategy. As towns and cities increasingly compete to attract investment, the presence of a high quality built, historic and natural environment is a vital business and marketing tool. Discerning companies are increasingly attracted to locations that offer well-designed, well managed public places and these in turn attract customers, employees, services and residents.

11.12

Environmental quality is an integral part of the public realm and a measure of civic pride. Improving environmental quality helps to shape the cultural identity of an area, exploiting its unique character and providing a sense of place for local communities.

11.13

Access to good-quality, well-maintained public spaces, can help to improve our physical and mental health by encouraging us to walk more, to play sport, or simply to enjoy an attractive green and natural environment. Successful places have well-designed green spaces that people want to use and respect, while better management, maintenance and supervision of public spaces help to allay fears of crime and anti-social behaviour. Similarly, well-designed streets and public spaces encourage walking, cycling and movement between spaces. Urban greening, street trees, living walls, green roofs and other types of green infrastructure enhance the recreational, landscape and ecological quality of the city, and increasingly contribute to the image and liveability of the city, the local economy and to urban renaissance.

11.14

The different ways in which environmental quality contributes to sustainable development are considered in the following policy areas:

- Ensuring High Quality Design
- Green Belt
- Green Infrastructure
- Open Space, Outdoor Sports and Recreation Facilities
- Biodiversity, Geological, Landscape and Archaeological Conservation

Quality Design

Background

11.15

The quality of people's lives is greatly affected by the quality of our environment, both in terms of the buildings that we use and live in and the spaces we use between buildings, including streets, squares, parks and other public and private spaces. Good design is also about creating spaces and buildings that are safe to use and move through, as well as being easy and convenient to use by all members of the community, including people with restricted mobility. National policy stresses the need to protect and create quality environments that can be achieved through following the principles of good urban design.

Existing Guidance

National Policy Guidance

National Planning Policy Framework

BREEAM Environmental Assessment Method

Building for Life – Delivering Great Places to Live (CABE/HBF 2008)

By Design – Better places to live (DETR/CABE 2001)

By Design – Urban design in the planning system: towards better practice (DETR/CABE 2000)

Relevant Evidence Base

Coventry Urban Design Study (1999)

Coventry Urban Design Guidance (2004)

Coventry Green Space Strategy (2008)

Coventry Green Infrastructure Study (2008)

Coventry Historic Environment Record (HER) Map of Designated Heritage Sites

11.16

Within the Core Strategy, development is proposed at a variety of geographical scales, including infill within existing urban areas and regeneration of deprived neighbourhoods. The implications for the design of such areas will be an important consideration on a more detailed or site specific basis. Supplementary Planning Documents will continue to provide best practice policy guidance.

11.17

The Council wants to significantly raise the standard of the built and green environment and developments will have to contribute towards the enhancement of living conditions in the city. The following objectives will underpin decisions about urban design:

- adaptability – ensuring developments can adapt to change;
- character – local identity;
- continuity and enclosure – defining the enclosure of spaces and public/private spaces;
- diversity – mix of uses and developments, including building types;
- ease of movement – good permeability and connectivity;
- legibility – recognisable routes and landmarks;
- quality of the public realm – attractive, safe, useable public spaces and routes; and
- sustainability – design and layout.

11.18

Good design assists in the creation of sustainable and inclusive communities and affects people's quality of life. Good design can help to reduce some of the environmental inequalities between the more deprived neighbourhoods and the rest of the city. In particular, good design can ensure that green space is integrated into development so as to enhance the local area, helping to make Coventry a much greener and more attractive city. Key design methods to reduce crime can also help improve community safety through, for example, careful consideration of landscape design and attractive lighting.

11.19

All development proposals will be required to achieve a high quality of design as a result of a fully considered and inclusive design process. Design of a contemporary nature will be supported in an appropriate context. In essence, the quality of development must always be 'good enough to approve' and this is true for small householder proposals and major schemes.

11.20

This strategy will ensure that development follows an effective design process, which assesses the physical, social and economic context, evaluates options and involves affected groups of people. Significant emphasis will be placed on how green space is created, integrated and connected, and how it will be used. Quality green space will make Coventry more attractive as well as a healthier place to live, work and enjoy. Green space will, therefore, be protected and promoted as an integral part of all development.

Policy DE1 Ensuring High Quality Design

All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area. Conservation Areas, and buildings and sites of local and national architectural, archaeological or historic interest will also be protected.

All development will be expected to meet the following key principles:

- respond to the local physical, economic and social context, reflecting local distinctiveness and identity, including, where appropriate, the protection of important views, including key views of the three spires;
- preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
- preserve or enhance the character and setting of major road, rail and canal corridors;
- clearly define the boundaries between public and private spaces and enclosure of space;
- provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
- make places that inter-connect and are easy to move through;
- ensure they are easily understood by users, with clear routes and distinct physical features;
- seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
- be adaptable to changing climate, social, technological, economic and market conditions;
- promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
- adopt sustainable and low carbon construction principles in terms of the design, layout and density, including developing buildings which are adaptable to a variety of uses and ensure that developments maximise the use of the site;
- consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained as an integrated, multidisciplinary and continuous requirement;

- minimise adverse impact on important natural resources;
- conserve, restore or enhance biodiversity; and
- respect and enhance landscape quality including hedges of value.

Supplementary Planning Documents will be prepared to promote best practice.

Green Environment

Background

11.21

A sustainable growth strategy relies on protecting and improving the quality of our green environment. Future development must be located to maximise the efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development.

11.22

High quality and well connected green infrastructure has the potential to make Coventry a much more attractive and prosperous city, and a healthier place to live, work and enjoy, with multiple benefits for the economy, the environment and people. Local networks of high quality and well managed open spaces help to create urban environments that are attractive, clean and safe, and can play a major part in improving people's sense of wellbeing. In order to underpin the overall quality of life in all areas and support wider social and economic objectives, the development and maintenance, to a high standard, of a well connected and multi-functional green infrastructure network, is essential. Part of the challenge will be to identify and secure funding to ensure that the investment and improvements made to the city's green infrastructure have a lasting impact and generate optimum value for public and private money. This high quality of design is crucial in encouraging people to continue to live in the city and to attract others to want to move to, visit and invest in the city.

11.23

Green infrastructure will also have an important role to play in helping the city adapt to climate change. This will include moderating urban temperatures, storing excess rainfall, increasing surface porosity to ease drainage, providing shade via tree canopies, and providing green oases in urban areas. Essentially, the city's green infrastructure is a visual expression of how we see ourselves as a society and the environment in which we choose to live.

Green Infrastructure (in Urban Green Space and Green Belt)

Policy GE1 Green Infrastructure

Development proposals will provide and protect green infrastructure based on an analysis of existing assets, informed by the Green Infrastructure Study, Green Space Strategy, incorporating the Council's Green Space Standards, and characterisation assessments. All developments will be underpinned by green infrastructure to help development integrate into the landscape and facilitate significant improvements in connectivity and public access, biodiversity, landscape conservation, archaeology and recreation.

Development must enable the conservation, improvement and management of green infrastructure in order to complement and balance the built environment and to deliver a high quality of life, health and well-being for all. Local deficiencies in green space and accessibility will be addressed wherever possible. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:

- Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal);
- Using developer contributions to facilitate improvements to its quality, connectivity, multi functionality and robustness; and
- Investing in enhancement and restoration where opportunities exist, and the creation of new resources where necessary, such as linking green infrastructure to other forms of infrastructure.

11.24

The long term vision for green infrastructure in Coventry, outlined in the Green Infrastructure Study, is the provision of a city wide network of high quality, well managed and well connected, multi functional green space, delivering a wide range of benefits to those living, working and visiting the city, and improving the attractiveness of the city as a whole. A typology of green infrastructure assets includes:

- Parks and gardens – urban parks, country and regional parks, formal and private gardens, and institutional grounds (for example schools and hospitals).
- Amenity green space – informal recreation spaces, play areas, outdoor sport facilities, housing green spaces, domestic gardens, village greens, urban commons, other incidental space, green roofs, hedges, civic squares and spaces, and highway trees and verges.
- Allotments, community gardens, city farms, orchards, roof gardens, and urban edge farmland.
- Cemeteries and churchyards.
- Natural and semi-natural rural, peri-urban and urban green spaces, including woodlands, hedgerows, scrub, meadows, wetlands, open and running water, brownfield sites, bare rock habitats, and community woodlands.
- Green corridors – river and canals including their banks, road and rail corridors and verges, cycling routes, and rights of way.
- Existing national and local nature reserves and locally designated sites for nature conservation (for example, Sites of Special Scientific Interest and Local Wildlife Sites, etc.)
- Historic landscapes, archaeological and historic sites.
- Functional green space such as sustainable urban drainage schemes and flood storage areas.

11.25

Green infrastructure is considered equal to all other forms of infrastructure and will be viewed as a critical element in the determination of planning applications. All outline and detailed planning applications will need to demonstrate consideration of the development's potential impact upon the existing green infrastructure network. Any development of the proposed urban extensions will inevitably involve a net loss of green space. However, opportunities to maximise green infrastructure potential and benefits will be a prerequisite of development.

11.26

Design of developments will need to respect their relation to the city's green infrastructure network and opportunities sought wherever possible to improve the network, including the installation of features such as urban trees and green roofs. Where open space is created within developments, it will be of a high and lasting design quality and its efficiency will be maximised through the designing in of multiple functions, including visual amenity, biodiversity, sustainable drainage, natural shading, informal recreation, adventure play, art appreciation and organised sports. The layout of this open space will also support the existing green infrastructure network.

11.27

Above all, the green infrastructure network will be accessible, useable and useful for both people and wildlife. It will be a key contributor to Coventry's aim to be a sustainable city and its actions against climate change, and help the city to project a positive and attractive image forwards into the 21st Century. In the next two decades, the Council, in partnership with the local community, will help to plan, deliver and manage green Infrastructure to maintain and develop a high quality environment, which makes Coventry attractive, vibrant, prosperous and sustainable. Priorities for investment will be in those areas where net gains in the range of functions can be most effective and in particular, where it improves public accessibility and local deficiencies in multi-functional green space provision, quality, biodiversity and connectivity.

Parks, Open Space, Outdoor Sports and Recreational Facilities

Policy GE2: Parks, Open Space, Outdoor Sports and Recreational Facilities

Strategic sites defined as parks and open spaces are an important element of the city's green space network and shown on the Proposals Map.

The extent and variety of green spaces within the city, makes it impractical to identify them all on the Proposals Map. Development involving the loss of any green space that is of value for amenity, recreational, outdoor sports and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:

- there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; and

- a deficiency would not be created through its loss, measured against the Coventry Green Space Standards.

Exceptionally, where the provision of green space is not considered appropriate on a development site, suitable replacement provision within an area of deficiency and accessible location could be appropriate and/or a contribution, in lieu of green space provision and commensurate with the commercial value of the site, to enhance the quality and accessibility of green space within the locality.

11.28

In order to address health inequalities and to promote healthier lifestyles, people need to have good access to a range of parks, open spaces, indoor and outdoor sports and recreational facilities. These spaces also add to the quality of the environment. This includes formal sports provision such as playing fields and play areas, as well as more informal areas of open space suitable for general relaxation, children's play, walking and cycling.

11.29

An extensive audit and needs assessment of recreational open spaces and outdoor sports facilities in the city was undertaken in consultation with the local community during 2007 (PPG17 Audit), which will be monitored and kept up-to-date during the plan period. This audit has informed the review and replacement of the Coventry Green Space Strategy and examines the quantity, quality and accessibility of green space provision within the city.

11.30

The Council has adopted a Green Space Strategy, which sets out minimum local standards for green space provision, based on a PPG17 Audit. It sets out the provision standards for the various categories of open space looking at quantity, quality and accessibility. There is also a set of quality standards for each of the provision standard categories. The same Green Space can sometimes contribute to more than one category in the standards. The minimum standards are in Appendix 3. The standards reflect the information received from the various need surveys and audit information and any new development will be required to meet these minimum standards in accordance with Policy EQ2 and Appendix 3. The extent and variety of green space within the city makes it impractical to identify it all on the Proposals Map, as even the smallest area of green space within the city, such as a pocket park, can contribute to the character and amenity of an area and will be protected.

Parks and Open Spaces

11.31

The city has identified a hierarchy of provision for its parks and open spaces. Within that hierarchy the sites defined as parks and open space (Premier Park, Area Park, Neighbourhood Park, Country Park, Principal Open Space, Incidental Open Space and Ornamental Areas) are important elements of the city's green space and are shown on the Proposals Map. They provide a sense of place for the local community and provide landscape quality to particular densely populated urban areas of the city.

Accessible Natural Green Space

11.32

It is widely understood that sites of natural or semi-natural nature that are accessible, enhance the quality of life for people. The wildlife and biodiversity benefits that these sites also contribute are often neglected. Biodiversity is important to the quality of the air that people breathe, to the richness in variety of species in an area and as an indicator of the health and quality of a local environment. These areas not only have benefits in terms of biodiversity, they can also be valuable to local economies and as a tourist asset. It is important to recognise that the public rights of way network may serve to provide people in the area with access to the wider countryside.

Provision for Children and Young People

11.33

For the purposes of developing the Green Space Strategy, provision for children and young people has concentrated the research on the fixed play provision within the city and consists of equipped play areas and other specialist provision, such as multi-use games areas and wheeled play provision or skate parks. However children play in a wide variety of other places as well.

11.34

Coventry also has a Play Strategy to improve play opportunities for children and young people entitled 'Something to do' developed by a range of Council services in partnership with the voluntary sector. The Play Strategy will be used to help the Council and its partners:

- Develop more and better local and inclusive play spaces and opportunities;
- Create a more child-friendly public realm;
- Improve understanding of the importance of children's play across the range of policy areas that have an impact on children's lives;
- Embed play within key strategic plans and initiatives; and
- Make effective use of funding.

11.35

The Play Strategy will be updated annually in the light of any changes in policy, funding, legislation, other strategies or plans. Local consultation with communities will also be fed back into the strategy. The strategy will be used to help inform planning decisions about play, including developer contributions, with particular reference to natural and informal play opportunities for children and young people. The Council will seek to protect open space of value to the community and provide accessibility to a sufficient quantity and quality, including the provision of parks and open spaces, natural green space, provision for children and young people, outdoor sports and allotments. In order to achieve this, the Council will seek to enhance and improve areas of existing open space, and to provide new types of open space where there is a deficiency in quantity, quality or accessibility. In seeking to improve play opportunities for children and young people, the strategy will be supported, with particular reference to promoting natural and informal play opportunities.

Outdoor Sports

11.36

Outdoor sports provision across the city includes specific sites developed within the hierarchy to focus resources and to promote sport and recreation, these are the

sports grounds. It considers grass pitch provision across the city, both public and private on dedicated sites or in other open spaces such as parks. It also considers other sports provision such as bowls, tennis and athletics that may also be on specific sites or in other spaces. There is a good distribution of sports pitches across the city and the level of community use needs to be established to enable accurate supply and demand calculations to be established.

Allotments

11.37

This section considers the provision of both public and private allotments across the city. The accessibility of green space varies greatly dependent upon the type of provision, and it is by their very nature that allotments are only accessible with restrictions in that you must be a tenant or plot holder. Allotments provide a key type of provision within the overall portfolio of open space, sport and recreation facilities. The value of allotments is significant, providing facilities for physical activity in addition to the promotion of healthy eating and educational value. The provision of allotments is a statutory function for local authorities under a number of acts including the 1950 Allotment Act. However, there is some indication that waiting lists are increasing and that allotments are becoming more popular.

Churchyards and Cemeteries

11.38

Cemeteries and closed churchyards can provide a valuable contribution to the portfolio of open space provision within an area. For many, they can provide a place for quiet contemplation in addition to their primary purpose as a final resting place. They often have wildlife conservation and biodiversity value.

Biodiversity, Geological, Landscape and Archaeological Conservation

Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation

The biodiversity and geological resources of the city, including Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Local Wildlife and Geological Sites, and strategic areas of Ancient Arden, will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted only if the benefits of the development clearly outweigh the extent of harm likely to be caused. In such cases, developers will be required to reduce, offset or compensate for such harm to the fullest practicable extent, with all decisions based on sound analysis. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, Ancient Woodlands, historic environmental assets and archaeological remains of value to the locality, will be

protected against unnecessary loss or damage and, in the case of archaeological remains, all practical measures must be taken for their assessment and recording.

11.39

Planning legislation places a biodiversity duty of care on all local and public authorities, emphasising that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their area. These characteristics include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics, the Council will continue to assess the potential to sustain and enhance these resources.

11.40

Connectivity between sites and buildings, and resilient and robust ecosystems, which are adaptable to change, are essential to ensure retention of existing levels of biodiversity and to enable these to be enhanced wherever possible. Resilient and functioning ecosystems support a range of human population needs, including flood management, control of atmospheric pollution, and access to green space.

11.41

In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the conurbation and connected corridors linking sites. Adaptation to climate change will require opportunities for wildlife to move in response to climate change impact and strengthen biodiversity levels through reducing the risk of extinction of isolated populations. Green infrastructure planning and implementation can contribute strongly to fulfilling this. Biodiversity will be promoted as a core component of sustainable development and landscapes for living, underpinning social, health, environmental and economic benefits, together with community well-being and local quality of life.

Habitat Biodiversity Audit Partnership (HBA)

11.42

In 1995, the six local authorities within the County of Warwickshire, plus Solihull and Coventry unitary authorities, English Nature (Natural England) and the Environment Agency established the Habitat Biodiversity Audit Partnership (HBA) under the management of Warwickshire Wildlife Trust. The HBA's remit was to survey every field and boundary in the sub-region to provide up-to-date biodiversity data primarily for spatial planning purposes. To date, the HBA is the only recognised best practice model for monitoring and auditing biodiversity by the European Union Committee of Regions.

11.43

In 2001, this survey was completed and the results entered into a Geographic Information System (GIS). Since then, a robust mechanism has been established to update the HBA on an annual basis and also to recommend Local Wildlife Sites.

11.44

Linked to this partnership, the Warwickshire Biological Record Centre (WBRC), run by Warwickshire County Council, maintains the most comprehensive set of data on

habitats, sites and species in Warwickshire. The recording area for the Records Centre also includes Coventry and Solihull, and the WBRC acts as an umbrella body for recording in the sub-region and maintaining the relevant data. The Ecology Unit within Warwickshire County Council has a Service Level Agreement with the Council, to advise the planning authority on all relevant planning applications and ecological matters.

Local Biodiversity Action Plan (LBAP)

11.45

The UK Biodiversity Action Plan provides the Government's targets for the conservation and enhancement of biodiversity, and Local Biodiversity Action Plans are the local manifestations of this in each county or sub-region. The Warwickshire, Coventry and Solihull Local Biodiversity Action Plan (LBAP) was compiled between 1998 and 2006 and outlines how landowners, land managers and policy makers will protect the characteristic wildlife and landscapes of our sub-region. The plan currently contains 26 Species Action Plans for our threatened plants and animals. There are 24 Habitat Action Plans covering our farmland, woodlands, wetlands, grasslands, urban areas and post-industrial land. Coventry is home to a number of European and national protected species including the otter, water vole, great crested newt and bat species.

11.46

Local authorities throughout the region have signed up to the LBAP through their County Strategic Partnership Plan and Community Strategies. A Steering Group comprising of officers from local authorities, together with representatives from the Wildlife Trust, Natural England, the Environment Agency, and the RSPB currently oversee the plan. The information has also helped to inform a Climate Change Strategy for Coventry adopted by the City Council in 2008.

11.47

The LBAP for Warwickshire, Coventry and Solihull provides a local response to the UK's National Biodiversity Action plan for priority species and habitats, i.e. those that are in urgent need of protection. It outlines how the county's landowners, land managers and policy makers will seek to achieve this and establishes hard targets to work towards. The Council has an agreement with the Warwickshire Biological Record Centre within Warwickshire County Council to computerise, validate and maintain Coventry's Protected and LBAP species records.

11.48

The Warwickshire, Coventry & Solihull Parish BAP – A Biodiversity Action Plan for Local Communities is an adaptation of the county's LBAP and the first of its kind in the country. Completed in July 2006, its 24 action plans for habitats and 26 for species outline how wildlife and wild spaces can be conserved for the future. It has been designed to translate these conservation priorities into practical action for biodiversity on the ground. It contains those action plans most relevant to small communities, adapted to encourage the involvement of people at a local level in improving their environment.

11.49

As part of the HBA Partnership, the Council will strengthen its programme during the plan period to protect, manage and designate further Local Nature Reserves and

Local Wildlife and Geological Sites within the city. It will continue to support the West Midlands Biodiversity Partnership, including its ambitious 50 year biodiversity Landscapes for Living initiative, which seeks to relate biodiversity opportunities to landscape, heritage and socio-economic elements. It will also ensure that biodiversity is a core component of sustainable development, underpinning economic development, community well-being and local quality of life.

11.50

In addition to the range of sites with biodiversity and geological value, there is a rich mosaic of associated landscape and archaeological features within the city, including mature woodlands, trees, hedgerows, ridge and furrow meadows and ponds, which have conservation value in their own right. They often contribute to the distinctive local character of an area, as well as being part of the historic fabric of the landscape and valued by the local community.

11.51

The Coventry Historic Environment Record (CHER) and the Historic Landscape Characterisation project (HLC), which covers Coventry and Warwickshire, aim to enhance and synthesise the understanding of the historic and cultural origins and development of the present day landscape. The objectives are to promote better management and understanding of the historic landscape resource; of the accommodation of continued change within it; and to establish an integrated approach to its sustainable management in partnership with other organisations.

11.52

An integrated approach will be taken to planning for biodiversity, geodiversity, landscape and archaeological conservation within the city.

**Coventry Local Development
Plan**

Section 12

Implementation & Monitoring Framework

Core Strategy Submission Draft

Implementation and Monitoring Framework

Introduction

10.1

This chapter identifies the processes by which the infrastructure necessary to support the level of planned development within the city would be secured and delivered. It links to other Core Strategy policies and supporting text to identify key strategic infrastructure as well as summarising broad requirements throughout the city.

Infrastructure Delivery

10.2

The need for infrastructure to support housing growth is a key requirement of the National Planning Policy Framework to help deliver growth and prosperity. In order to deliver sustainable growth and development the timely delivery of supporting infrastructure is a necessity that must be considered alongside all forms of development.

10.3

The infrastructure necessary to support the proposed growth and expansion of the city comprises of three elements:

- Physical
- Social and
- Green Infrastructure.

They cover broad areas of services and facilities (as identified below), which are vital to delivering sustainable growth. Their importance to the city is also a key strand within all 10 themes of the Sustainable Community Strategy.

Physical infrastructure covers: transportation networks (roads, public transport, footpaths and cycle ways); water; drainage; flood prevention; and utility services such as electricity, gas and telecommunications.

Social infrastructure covers: education (primary, secondary, higher and special needs); health facilities (hospitals and primary care providers); social services; emergency services (police fire and ambulance); and other community facilities, such as indoor sports, cultural facilities, libraries, cemeteries and community halls

Green infrastructure covers: parks; allotments; footpaths; cycle paths; natural spaces; sports and cultural facilities; and play areas

10.4

This list of specific infrastructure has been developed through a robust and credible evidence base, joint working and focused consultation. **The list should not be considered exhaustive, as future monitoring of the Core Strategy and subsequent Plans may highlight further needs within the City that require attention and investment.**

Existing Guidance

National Policy Guidance

National Planning Policy Framework 2012

Relevant Evidence Base

Green Space Strategy and Green Infrastructure Study, 2008

Strategic Flood Risk Assessment, 2009

Water Resources Study, 2008

Funding mechanisms

10.5

Infrastructure is provided by a variety of public and commercial bodies through a range of different funding and delivery mechanisms. These will all contribute to how Coventry develops over the next twenty years and be crucial to help deliver sustainable growth.

10.6

Significant funding will be channelled largely through the utility and transport companies such as Severn Trent Water, Virgin Media and Centrica. The Council and its partners may also consider ways of promoting the city to additional commercial operations such as High Street opticians and private health care companies in order to meet longer-term shortfalls in provision or changing market requirements.

10.7

The provision of infrastructure will also be dependant on significant levels of Community Infrastructure Levy funding. This will identify an appropriate levy charge dependant on the type of development and where it is proposed to be located.

10.8

Planning obligations will still be required until the CIL charging schedule is adopted to ensure provision is made for the necessary improvements to services and facilities or to secure compensatory provision for any loss or damage arising from, for instance the loss of open space. Obligations may also be necessary to help achieve Core Strategy policies, such as the provision of affordable housing or contributions towards reducing Coventry's carbon footprint, particularly in respect Policy EM1.

Infrastructure Requirements

10.9

The Core Strategy has been developed alongside continued consultation with the bodies responsible for infrastructure delivery. The views of these bodies have been used in testing and underpinning the strategy, although there remain some areas, which will require ongoing consultation with the responsible bodies and agencies to identify future, unforeseen constraints. Infrastructure providers have been kept fully informed of, and involved with, the Core Strategy, in order to ensure that required infrastructure will be delivered in a timely manner.

10.10

Initial consultation and evidence gathering has suggested Coventry has sufficient gas and electricity provisions already in place to cope with the envisaged growth within the urban area. There is not expected to be significant problems connecting to existing gas mains and the electricity network. Coventry City Council will continue to engage with the providers of these utilities to ensure appropriate steps are incorporated into their future plans and development is not unduly restricted.

10.11

In June 2008 JE Jacobs, on behalf of Severn Trent Water (STW), undertook a Water Resources Study for the city to consider the impact of proposed development on the water system and sewage network. In terms of water supply, the proposed level of development is expected to result in a 3.5% rise in daily demand, which can be accommodated through existing sources. The existing distribution system, however, is unsuitable for increased flows under peak conditions and will require the removal of a Pressure Reducing Valve from the system (via re-valving) in the Stoke Aldermoor area of the city.

10.12

With regards to sewage treatment, the existing STW facility at Finham can accommodate the proposed level of growth, which is estimated to equate to a 14% increase in flow to the works. The foul and surface water flow system however fares less favourably, with existing flood issues already identified within some parts of the urban area. Extra flows from new developments are expected to exacerbate these issues and potentially create new concerns. Consultation with STW has identified a need within their next planning cycle to resolve these issues and create additional capacity to serve the expected level of growth. The cost of such solutions is expected to be in the region of £4-5m, but this is not expected to delay any development activity within the city. In addition, however, all new developments will be required to conform to Policy OS1 and this will require developers, where necessary, to provide flood prevention / mitigation infrastructure specific to the development site.

10.13

As well as utility supplies, other critical relationships between development and infrastructure arise in transport, accessibility, green space and community provisions. These key requirements and their importance to delivering the spatial strategy are summarised below.

10.14

Although making the best use of existing transport infrastructure will be the main priority, patterns of growth for the city may require new transport infrastructure and service patterns. Although congestion is generally not as significant a problem in Coventry as it is in other parts of the West Midlands, there are areas and times where it does create significant issues with regards air quality and road safety.

10.15

The overall long-term vision for green infrastructure in Coventry, outlined in the Green Infrastructure Study and in Chapter 11, is the provision of a city-wide network of high quality, well-managed and well-connected, multi-functional green space, delivering a wide range of benefits to those living, working and visiting the city, and improving the attractiveness of the city as a whole.

10.16

In order to address health inequalities and to promote healthier lifestyles, the population of Coventry needs to have good access to a full range of Green Infrastructure facilities. Through the city's Green Infrastructure Study and Green Space Strategy, green space standards have been identified for different parts of the city. All developments will therefore be expected to contribute to improving the quality of existing provision or, where possible, make available additional facilities.

10.17

With development being focused within the Hub and Spokes, the demand and need for social, community and leisure facilities is likely to grow significantly. In order to achieve adequate provision, new or expanded community and leisure centres will be required to meet the needs of the city's population. Contributions from all developments within the existing urban area will be sought to help fund the expansion and improved quality of existing provision within the locality. This will also help meet the needs generated by the residents and/or workforce associated with the new development.

10.18

Although there is very limited spare capacity within the city's existing school network, appropriate contributions or provision will be required in conjunction with new housing. This will help to ensure adequate proximity and promote opportunities for children to reach school by foot or cycle. Contributions will also be used toward school expansions and meeting the demand for increased educational resources.

10.19

There are 4 Fire Stations and 3 Police Stations located within the Coventry urban area. Both services have a central presence within the city centre with satellite facilities to the southeast and northeast. There is an out of centre fire service located in Canley to the southwest of the city but no police presence. Initial evidence suggests fire station provision will be adequate to serve an increased population. However, ongoing consultation will be required through the Community Infrastructure Levy charging schedule to identify future funding requirements to provide an adequate service. Contributions will therefore be sought from developers through policy. Consultation will continue with the Police Authority to identify specific sites and areas for service expansion.

10.20

General Practitioners consortia will be responsible for the overall commissioning of health care services throughout the city working in partnership with the Council to identify areas of the city that require investment to support the proposed level of housing. In the first instance, funding will be prioritised to improve existing premises where these are suitable for long-term development. In areas where higher levels of new development are expected, additional new facilities will be required to support an improved level of GP practices as well as serving the need of the expanding population. Contributions from new developments through providing land and/or contributions will be required in order to help meet the identified need. It is also likely that new facilities built within the city will follow national requirements and be allocated as health centres rather than just surgeries.

Co-ordinating Delivery and Implementation

10.21

The Council has considered the implications of known infrastructure requirements in preparing the Core Strategy. Multiple land ownership may prevent additional obstacles in identifying land for Green Infrastructure or public transport improvements. In this instance, the Council may be required to use its Compulsory Purchase powers to aid in the delivery of key infrastructure.

10.22

In order to ensure infrastructure is delivered in a timely and appropriate manner, the Council will maintain continued communication with all relevant public and private sector service providers. This will be established through the Community Infrastructure Levy charging schedule and associated consultations.

10.23

The detailed timetable of infrastructure requirements is set out in the accompanying delivery framework.

Policy IM 1: Developer Contributions for Infrastructure

Community Infrastructure Levy charging and Planning Obligations will be used to further the Core Strategy policies and enable development to proceed that might otherwise not be viable and deliverable.

Negotiations will be based on the general principle that developers should ordinarily provide or fund additional or improved social, transport and other communal infrastructure, facilities and services in fair and reasonable proportion to the demands arising from the proposed development.

Full details will be expressly detailed in the Council's Community Infrastructure Levy charging schedule.

Table 5: Infrastructure Programme

Physical Infrastructure					
Scheme	Outcome/Impact	Delivery Agency	Timing	Costs	Funding sources
Water supply – removal of Pressure Reducing Valve in Stoke Aldermoor	Improvement to overall water distribution	STW	Medium-term		STW
Water supply - general	Supplies to new developments	STW	Through-out Plan period		Developers
Sewerage	Extra flows from new developments	STW	Through-out Plan period		Developers
Flood prevention – specific schemes	Resolve existing issues	STW	Through-out Plan period	£4-5M	STW
Flood prevention-general	Prevent/mitigate future issues	STW	Through-out Plan period		Developers
Electricity/Gas/ Telecommunications	Supplies to new developments	Utility and telecommunications companies	Through-out Plan period		Developers
Energy from Waste Plant	Refurbishment of existing incinerator	Council/ Solihull MBC	Medium-term		
Social Infrastructure					
Higher Education	University of Warwick expansion. Coventry University expansion.	University of Warwick/ Coventry University	Short/ Medium term		University of Warwick/ Coventry University
Secondary Education	Appropriate levels of accessible provision	Council/ Private providers	Three phases of Building Schools for the Future to 2015. Academy programme		City Council/ BSF/Private providers
Primary Education	Appropriate levels of accessible provision	Council/ Private providers	Through-out Plan period.		Council/ Private providers.
Health Facilities – City Centre Health Facility	Replacement building	PCT/LIFT/ Private Providers	Short-term (2010 start)		PCT/LIFT
Health Facilities – Hillfields Local Health Centre	Replacement building	PCT/LIFT	Short-term (2011 start)		PCT/LIFT
Health Facilities – general	Appropriate levels of accessible provision.	PCT/LIFT/ Private Providers	Through-out Plan period		PCT/LIFT/ Private providers.
Social services	Appropriate levels	Council	Through-out		Council

	of accessible provision		Plan period		
Emergency services	Appropriate levels of provision	Police/Fire/Ambulance Authorities	Through-out Plan period		Central Government/Council
Community facilities/halls	Appropriate levels of accessible provision		Through-out Plan period		Council/Developer contribution
Libraries	Appropriate levels of accessible provision	Council	Through-out Plan period		Council
Cemeteries	Appropriate levels of provision	Council	Through-out Plan period		Council
Sports and Cultural facilities	Appropriate levels of accessible provision	Council/Community providers/Private providers	Through-out Plan period		Council/Community providers/Private providers
Green Infrastructure					
Parks – NDC area	Sowe Valley and Manor Farm	Council	Short/medium-term		Council/Developer Contribution
Parks – Canley Regeneration	Prior Deram Walk and railway corridor	Council	Medium-term		Council/Developer Contribution
Parks - general	Appropriate levels of accessible provision	Council	Through-out Plan period		Council/Developer contribution
Allotments	Appropriate levels of accessible provision	Council/Community providers	Through-out Plan period		Council/Developer contribution
Natural spaces	Appropriate levels of accessible provision	Council/Developers	Through-out Plan period		Council/Developer contribution
Play areas	Appropriate levels of accessible provision	Council/Developers	Through-out Plan period		Council/Developer contribution

Table 5a - Infrastructure Delivery Plan - Highways and Transportation

Scheme	Justification	Delivery Timeframe	Associated Developments	Estimated Cost	Delivery Mechanism
Smarter Routes and Choices					
Package of hard and soft measures to reduce the need to travel and encourage modal shift away from single occupancy car journeys, especially shorter trips. This involves measures such as cycle tracks / lanes / parking, and Personalised Travel Planning	This approach is evidenced to be most effective in reducing vehicle trips that are unnecessarily made by car. It will improve accessibility to goods and services locally and free up highway capacity for longer distance trips	All Development Period	City Wide	£15,000,000	S38 / S278 / LSTF / LTP / Other DfT grants
Bus Smartcard / Integrated Ticketing					
Public Transport payment system upgraded to a smartcard based cashless system which is accepted by all operators and rail.	This reduces a major barrier to travel and cost effectively encourages PT usage and a positive modal shift. Improves connectivity and accessibility within the journey to work area	Medium Term	City Wide	TBC	Centro / Private Bus Operators / CCC ITA Levy
Rail Stations and Frequency Improvements					
Significant improvements to Coventry Station. Further increase in and extension to local rail service frequencies and additional stations on the North-South corridor. Increased line and service capacity towards Birmingham and a maintained / improved level of service from Coventry to London	Heavy Rail is the most effective method of inter urban connectivity. Improving service frequencies, particularly on the local routes will give the city more gravity as a destination regionally and lead to economic	Phased delivery throughout plan period	City Wide / Friargate		DfT Rail Franchise / Network Rail CPs

	growth.				
Station Access Improvements and new Station Interchanges					
Improved pedestrian connectivity to stations and bus journey time savings in accessing / egressing. New Bus - Rail Interchanges at Coventry, Till Hill and Arena Stations	Improved connectivity to stations increases accessibility of the Hub. Fast efficient interchange between rail and bus improves accessibility of employment sites and residential areas within the city, leading to improved regional accessibility. Also reduces need for inefficient land use occupied by long stay car parking	Short / Medium Term	City Wide	£4,500,000	DfT grants, BBAF, LSTF / CIL
Rapid Transit Network					
Rapid Transit Network connecting the major trip generating sites in the city. Improving connectivity between key employment, education and public services sites and acting as a catalyst for regeneration and investment.	Connectivity to and between the major sites of activity within the city needs to be improved to aid economic growth and capture agglomeration benefits. Capital investment will lead to confidence of businesses to expand and invest in the city	Phased delivery throughout plan period	City Wide / CW Gateway	£80,000,000	S106 / S278 / CIL / Major Scheme Funding / Private Section Investment
A45 Corridor Highway Efficiency Enhancement					

Remodelling junction with A429 Kenilworth Road. Improvements to Leamington Rd / St. Martins Road roundabout, B4101 Tile Hill Lane junction and Broad Lane junction	This corridor is of strategic importance to the city's economy for access to employment, higher education, R&D sites. Delays at key junctions are suppressing development and economic growth.	Short / Medium Term	City Wide	£7,700,000	S106 / LSTF / S278 / CIL / LTP
Trunk Road Enhancements					
Grade Separation of A45/A46 Tollbar End, widening of A45 Tollbar to Stivichall. Further Improvements to A46 / A428, and A46 / Sowe Valley Link Road. Extension of Active Traffic Management on M6 J4 to J2	Coventry's key high level of accessibility to the Primary Route network needs to be maintained whilst allowing growth to take place across the Coventry & Warwickshire LEP area	Phased delivery throughout plan period	Regional / National Connectivity	£110,000,000 Tollbar to Stivichall	HA Major Schemes
				A46 / A428 and ATM M6 J4 - J2 Unknown	
A444 Corridor Highway Efficiency Enhancement					
Includes improvements to Arena Park, Foleshill Road island, Stoney Stanton Road island, Whitley Interchange and improvements between missing link from Whitley to Binley Road	Bottlenecks along this sub-regionally important North-South corridor cause re-routing to other less appropriate roads which leads to suppression of development	Phased delivery throughout plan period	Sub-regional North-South Connectivity	£9,400,000	S106 / S278 / CIL
Inner Ring Road Capacity Enhancements					
Improvements to the capacity of the Inner Ring Road and junctions as access points to the Hub	The Inner Ring Road protects the Hub from unnecessary through traffic and facilitates pedestrian priority within it. Increases in Hub activity will require efficiency	Phased delivery throughout plan period	Hub / City Wide	£3,250,000	CIL

	improvements to the road				
Queensland Avenue / Four Pounds Avenue					
Improvements to the efficiency of the junction on stressed radial / orbital intersection	There are lack of North-South connections to the west of the city due to railway line and river. This is a key route that is stressed already and city wide development will make it worse	Medium Term	Developments in the South-West quadrant of the city	£400,000	CIL

Monitoring

10.28

The Council will produce and publish an Annual Monitoring Report containing information on the implementation of the Local Development Scheme and on the extent to which policies set out in Core Strategy are performing.

10.30

Table 6 below shows a set of indicators and targets related to the policies of the Core Strategy Proposed Submission Document. Further development plan documents will contain their own indicators and targets and the results will be brought together in the Annual Monitoring Report.

Table 6: Indicators and Targets

Policy	Indicator	Target
EM1	Percentage of applicable new residential development achieving the required CSH level evidenced by a submitted certificate	100%
	Percentage of new development achieving the required BREEAM level evidenced by a submitted certificate	100%
EM2	Percentage of new development submitting an energy statement to meet the specified requirements.	100%
	Number of applicable developments in the hub and spokes connected to/covered by a Decentralised Energy Network (DEN)	To be agreed in conjunction with the emerging Energy Strategy for Coventry.
EM3	Number and capacity of renewable energy installations with a valid planning permission.	N/A
EM4	Cross referenced to individual policy sections	N/A
EM5	Amount of new green and blue infrastructure provided.	To be agreed in conjunction with Coventry's Green Space Strategy and Policy EQ3
	Number and size of green roofs granted permission as part of development schemes.	N/A
EM6	Percentage of new developments meeting the required water efficiency standard.	100%
EM7	Number of planning permissions granted against Environment Agency advice	0%
EM8	Percentage of relevant new developments granted planning permission in line with the SUDS Approval Body	100%
EM9	Cross referenced to other individual policy sections	N/A
EM10	Number and capacity of new waste management facilities by type	To be agreed through the revised municipal Waste Management Strategy for Coventry
	Percentage of new residential dwellings with space for waste storage (recycling, domestic refuse and composting)	100%

Policy	Indicator	Target
	Percentage of total waste recycled.	To be agreed through the revised municipal Waste Management Strategy for Coventry
EM11	Number of planning permissions granted against the advice of the relevant mineral statutory undertakers.	0%
H1	Number of net housing completions per annum.	669 net dwellings per annum
	Extent of a 5 year land supply.	at least 3,513 dwellings over a rolling 5 year period (669 x 5 + 5% buffer)
	% of completions on Previously Developed Land	100%
H2	Number of new self-build properties completed per annum	N/A
H3	Number of completions achieved through conversion from non-residential uses.	N/A
	Number of demolitions of affordable and market dwellings per annum.	N/A
H4	Total number of affordable properties completed per annum.	To be managed against the level of overall need and supported by the Housing Strategy
	% of schemes that are in excess of the 20 dwelling threshold that are to provide affordable housing in line with the policy approach to higher and mid-lower value areas.	100% of appropriate schemes.
H5	Number of completed bed spaces for student provision.	To increase the number of bed spaces relevant to the number of full time students at both universities.

Policy	Indicator	Target
H6	Number of unauthorised pitches recorded in the 6-monthly count by the DCLG.	0 unauthorised pitches.
H7	Number of completed bed spaces within the C2 Use Class	N/A
H8	Number of PDL sites both inside and outside the Ring Road built at less than 35dph and 100dph (net) respectively.	0 completions
	Number of Greenfield sites built below 30dph.	0 completions.
H9	Number of homes completed within the city centre boundary.	No specific target – to be monitored to support overall delivery and urban regeneration.
JE1 & JE2	Maintaining an adequate supply of employment land	Maintaining a reservoir of at least 30 hectares of employment land to serve the city
JE3	“Loss” (in ha) of high or above average overall quality employment land to other uses	Zero employment land of high or above average overall quality ‘lost’ to other uses
JE4	% of total site area of employment land redeveloped for use class other than ‘B’ use.	No more than 50%
SC2	Percentage and number of planning applications approved in centre.	100%
SC4	Percentage and number of planning applications granted against requirements of emerging Hot Food Takeaway SPD.	0%
Acc 3	Number of Travel Plans agreed	No target set
Acc 4	Number of new cycle routes	No target set

Policy	Indicator	Target
GB1	Percentage of inappropriate development granted permission in the Coventry Green Belt	0%
HE1	Number of heritage assets demolished	Zero
GE3	Number of improved sites	No specific target

**Coventry Local Development
Plan**

Appendix 1

**Replacement of Coventry Development Plan
Saved Policies by Core Strategy**

Core Strategy Submission Draft

Coventry Development Plan List of Saved Policies

Policy	Title	Superseded by	Saved
Overall Strategy			
OS 1	The Objectives And Outcomes Of The Plan	OS1	
OS 2	Strategic Regeneration Sites	H1	
OS 3	Local Area Regeneration	OS1	
OS 4	Creating A More Sustainable City	OS1	
OS 5	Achieving A High Quality City	OS1 and DE1	
OS 6	Change Of Land Use	OS1	
OS 7	Mixed Land Use	OS1	
OS 8	Equal Opportunity	OS1	
OS 9	Access By Disabled People	OS1 and National Requirements	
OS 10	Planning Obligations	IM1	
Environmental Management			
EM 2	Air Quality	EM9	
EM 3	Water Resources and Quality	EM5	
EM 4	Flood Risk and Development	EM7	
EM 5	Pollution Protection Strategy	EM2 and EM4	
EM 6	Contaminated Land		Yes
EM 7	Hazardous Installations And Nearby Development	Spent	
EM 8	Light Pollution		Yes
EM 9	Waste Strategy	EM10	
EM 10	Re-use and Recycling	EM10	
EM 11	Materials Recycling Facilities	EM10	
EM 12	Composting	EM10	
EM 13	Landfill	EM10	
Housing			
H 1	People and their Housing Needs	H1	
H 2	Balancing New and Existing Housing	H3	
H 3	The Improvement of the Housing Stock	H3	
H 4	Residential Extensions	H3	

Policy	Title	Superseded by	Saved
H 5	Conversion from Non-residential to Residential use	H3	
H 6	Conversion to Multiple Occupation	H3, H5 and National Guidance	
H 8	Principal Housing Sites		Yes
H 9	Windfall Additions to Housing Land Supply	H1 and H2	
H 10	Affordable Housing	H4	
H 11	Housing for People with Special Needs	H7	
H 12	Design and Density of Housing Development	H8 and DE1	
H 13	Care Homes and Nursing Homes	H7	
Economy and Employment			
E 1	Overall Economy And Employment Strategy	JE1	
E 2	Consolidating and Strengthening the City's Existing Economic Base	JE1	
E 3	Diversification of the Local Economy	JE1	
E 4	Hotels, Conference and Training Accommodation	JE1	
E 5	Office Development	JE1	
E 6	Principal Employment Sites		Yes
E 7	Site Reserved for the Expansion of Jaguar/Ford Cars	GB1	
E 8	Redevelopment of Existing Employment Sites	JE3 and JE4	
E 9	Windfall Additions to Employment Land Supply	JE1 and JE2	
E 10	Accessibility to Job Opportunities	OS1 and JE1	
E 11	Employment and Training Initiatives to Assist the Priority Areas	OS1 and JE1	

Policy	Title	Superseded by	Saved
E 12	Warehousing Development	JE5	
E 13	General Industrial Development (B2) in Residential Areas.	OS1 and JE1	
Shopping			
S 1	Shopping Strategy	SC1	
S 2	Major District Centres	SC1	
S 3	Foleshill Gasworks Major District Centre	Spent	
S 4	District Centres	SC1	
S 5	Local Centres	SC1	
S 6	Ground Floor Units In Defined Centres	SC3	
S 9	Local Shops	SC1	
S 10	Catering Outlets	SC4	
S 11	Edge-Of-Centre And Out-Of-Centre Retailing	SC2	
Access and Movement			
AM 1	An Integrated, Accessible And Sustainable Transport Strategy	Acc1	
AM 2	Public Transport	Acc5	
AM 3	Bus Provision In Major New Developments	Acc5	
AM 4	Bus Priority Measures	Acc5	
AM 5	Bus Park And Ride	Acc3	
AM 6	Hackney Carriage Ranks	Acc1	
AM 7	Rail Services	Acc6	
AM 8	Improving Pedestrian Routes	Acc4	
AM 9	Pedestrians In New Developments	Acc4	
AM 10	Traffic Calming	Acc2 and Acc3	
AM 11	Improving Cycling Facilities	Acc4	
AM 12	Cycling In New Developments	Acc4	
AM 13	Cycle Routes	Acc4 and SPD	
AM 14	Roads	Acc1 and Acc2	
AM 15	Highway Authority Road Schemes	IM1	

Policy	Title	Superseded by	Saved
AM 16	Other Road Schemes	IM1	
AM 19	Off-Street Car Parking Areas	Acc3	
AM 20	Road Freight	Spent	
AM 22	Road Safety In New Developments	Acc1	
Built Environment			
BE 1	Overall Built Environment Strategy	DE1 and HE1	
BE 2	The Principles Of Urban Design	DE1	
BE 4	Road Corridors	DE1	
BE 5	The Canal Corridor	DE1 and EM5	
BE 6	The West Coast Main Line Railway Corridor	DE1	
BE 7	Gateways	DE1	
BE 8	Conservation Areas	HE1	
BE 9	Development In Conservation Areas	HE1	
BE 10	The Retention Of Buildings In Conservation Areas	HE1	
BE 11	Alteration Or Extension Of Listed Buildings	HE1	
BE 12	Changes Of Use To Listed Buildings	HE1	
BE 13	Demolition Of Listed Buildings	HE1	
BE 14	Locally Listed Buildings	HE1	
BE 15	Archaeological Sites	GE3 and HE1	
BE 16	Telecommunications		Yes
BE 17	Outdoor Advertisements	Spent	
BE 18	Public Art	DE1	
BE 19	Lighting	DE1	
BE 20	Landscape Design And Development	DE1	
BE 21	Safety And Security	DE1	
Green Environment			
GE 1	Green Environment Strategy	GE1 and GE2	
GE 2	Green Space Enhancement Sites	GE2	

Policy	Title	Superseded by	Saved
GE 3	Green Space Corridors	GE2	
GE 4	Protection of Outdoor Sports Facilities	GE2	
GE 5	Protection of Allotment Gardens	GE1 and GE2	
GE 6	Control over Development in the Green Belt	GB1 and GB2	
GE 7	Industrial or Commercial Buildings in the Green Belt	GB2	
GE 8	Control over Development in Urban Green Space	GE1 and GE2	
GE 9	Green Space Provision in New Housing Developments outside the City Centre	GE2	
GE 10	Proposals for New Outdoor Sport or Recreation Facilities in Urban Green Space	GE2	
GE 11	Protection of Sites of Special Scientific Interest, Local Nature Reserves and Coventry Nature Conservation Sites	GE3	
GE 12	Protection of Other Sites of Nature Conservation Value	GE3	
GE13	Species Protection	GE3	
GE 14	Protection of Landscape Features	GE3	
GE 15	Designing New Development to Accommodate Wildlife	GE1 and GE3	
Social, Community and Leisure			
SCL 1	Social, Community, Leisure And Indoor Sports Facilities	SC1	
SCL 2	Large Social, Community, Leisure And Indoor Sports Facilities	SC5	
SCL 3	Small Social, Community, Leisure And Indoor Sports Facilities	SC5	
SCL 6	Educational Facilities	GB1, H2, SC1 and National Guidance	
SCL 7	Schools and Colleges of	GB1, H2, SC1 and National Guidance	

Policy	Title	Superseded by	Saved
	Further Education		
SCL 8	Coventry University		Yes
SCL 9	University of Warwick		Yes
SCL 10	Health And Social Care	SC5	
SCL 12	Local Health And Social Care Facilities	SC5	
SCL 14	Re-Use Or Redevelopment Of Facilities	SC5	
City Centre			
CC 1	City Centre Strategy	SC1	
CC 2	A Vibrant And Entertaining Market Place	SC1	
CC 3	A Living Heart	H9	
CC 4	New Housing Sites		Yes
CC 5	Sites and Areas with a Substantial Housing Element		Yes
CC 6	Warm and Welcoming Public Spaces	DE1 and SC1	
CC 7	Major Environmental Improvement Schemes		Yes
CC 8	Accessible to All	Acc1 and Acc6	
CC 10	Public Car Parking		Yes
CC 11	Sparkling through Good Quality Design and Management	DE1	
CC 12	Distinctive Areas		Yes
CC 13	The Central Shopping Area	SC1	
CC 15	Smithford Way Redevelopment		Yes
CC 16	Barracks Redevelopment		Yes
CC 18	The West End Area		Yes
CC 21	The Southside Area		Yes
CC 23	The Queens Road/Butts Area		Yes
CC 24	Queens Road/Butts Area – Social, Community and Leisure		Yes
Uses			
CC 25	The Station Area		Yes

Policy	Title	Superseded by	Saved
CC 26	Station Area Sites		Yes
CC 27	The Parkside Area		Yes
CC 30	The Coventry University Area		Yes
CC 33	The Cathedral Area		Yes
CC 34	The Phoenix Area		Yes
CC 38	Phoenix 3		Yes
CC 39	Pool Meadow		Yes
CC 40	The Ring Road Area		Yes
CC 41	Subways		Yes
CC 42	Bridges		Yes
CC 43	“At-grade” Crossings		Yes
CC 44	The Swanswell Area		Yes
CC 45	The Coventry and Warwickshire Hospital Site		Yes

Supplementary Planning Guidance / Documents

Supplementary Planning Documents (SPD) will form part of the new Coventry Local Development Plan, expanding or adding detail to policies in this and subsequent documents, or to a saved policy from the existing Development Plan. Supplementary Planning Guidance (SPG) is no longer produced but can still be relevant as a material consideration if related to a new or “saved” policy. Over the course of the plan period all SPG will be replaced by appropriate SPD.

Supplementary Planning Guidance listed in the CDP but now relating to Core Strategy Policies	
Extending Your Home, A Design Guide	Policy H3
Houses in Multiple Occupation – Development Control Guidelines	Policy H3 and H5
Canal Corridor Study	Policy HE1, DE1 and GE1
Stoke Green Conservation Area Control Plan Chapelfields Conservation Area Control Plan Kenilworth Road Control Plan	Policy HE1 Policy HE1 Policy HE1

Spon Street Townscape Scheme – Control Policy for Signs and Advertisement Displays Security Shutters and Grilles	Policy HE1 Policy DE1
Affordable Housing	Policy H4
Extending Your Home A Design Guide	Policy H3 and DE1
Design Guidance for New Residential Development	Policy H3 and DE1
Design Guidelines for Development in Coventry's Ancient Arden	Policy HE1 and GE3
Spon End and Naul's Mill Area of Local Distinctiveness	Policy HE1
Urban Design Guidance	Policy DE1
Baginton Fields Development Brief (1997)	Saved alongside Policy H8 of the CDP
Supplementary Planning Document relating to Core Strategy Policies	
Delivering a More Sustainable City	Policy OS1

The following SPG's and Development Briefs identified in Appendix 1 of the 2001 CPD are not being carried forward by this Core Strategy. As such they are now deleted.

Care Homes for the Elderly and Homes for the Mentally Handicapped	Superseded
Planning Guidelines for Outdoor Poster Advertising in the city	Superseded
Planning Policy for the Location of Satellite Antennae	Superseded
University of Warwick Development Plan	Superseded
Allesley Annex Development Brief (1995)	Spent

Westwood Heath Phase 1 Development Brief (1996)	Spent
Radford Green Development Brief (1996)	Spent
Ivy Farm Lane Sites Development Brief (1997)	Spent
John Shelton School Development Brief (1997)	Spent
Mount Nod School Development Brief (1998)	Spent
Stoke Heath School Development Brief (1998)	Spent

**Coventry Local Development
Plan**

Appendix 2

Glossary

Core Strategy Submission Draft

AAP

Area Action Plan – A Development Plan Document which focuses upon a specific location or an area subject to significant change.

Affordable Housing

Housing, including social rented and intermediate housing, for people whose needs are not met by the housing market

AMR

Annual Monitoring Report – Report published once a year and submitted to the Government by local planning authorities or regional planning bodies assessing progress with and the effectiveness of policies.

AQMA

Air Quality Management Areas – Designation made by Local Authority where assessment of air quality requires action plan to improve the air quality.

Area of Local Distinctiveness

Area of local historic and architectural significance which, although not important enough to be declared as a Conservation Area, has sufficient distinctiveness and character to merit preservation

BAP

Biodiversity Action Plan – A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

BREEAM

Building Research Establishment Environmental Assessment Method – Widely used environmental assessment method for buildings, which sets the standard for best practice.

Brownfield Land

Previously developed land occupied by a permanent structure and associated development, such as car parking, which can be re-developed for other uses.

CDP

Coventry Development Plan 2001 – The existing statutory land use Plan for the city which the LDF will supersede. It comprises the policies against which proposals for physical development are currently evaluated and provides the framework for change and development in the city.

CIL

Community Infrastructure Levy. A levy placed on development, to fund new or additional infrastructure needs.

Circular

Non statutory advice and guidance on particular issues which expands and clarifies subjects which are referred to in national legislation.

Comparison Shopping

Items not bought on an everyday basis, but after comparison of alternatives from various sources such as clothes, shoes and electrical items

Conservation Area

Area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

Convenience Goods

Items bought on an everyday basis such as food-shopping

Core Strategy

Development Plan Document setting out the spatial vision and strategic objectives of planning framework for an area

CPO

Compulsory Purchase Order – An order issued by the government or a local authority to acquire land or buildings for public interest purposes. (e.g. Land for new roads).

CSA

Central Shopping Area – The main retail area within the city centre. It meets the convenience and comparison shopping needs of the city’s population and also acts as a sub-regional retail centre to some degree. It contains local needs shops, national comparison multiples and a range of small independent specialist shops.

CWLEP

Coventry and Warwickshire Local Enterprise Partnership. Local Enterprise Partnerships are locally-owned partnerships between local authorities and businesses and play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs.

They are also a key vehicle in delivering Government objectives for economic growth and decentralisation, whilst also providing a means for local authorities to work together with business in order to quicken the economic recovery.

DCLG

Department of Communities and Local Government

Density

In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare

Development

Development is defined under the Town and Country Planning Act 1990 as “the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land”.

DIRFT

Daventry International/Intermodal Rail Freight Terminal

District Centre

Significant group of shops serving a large part of the city including both comparison and convenience shopping, as well as other commercial and public services and facilities

DPD

Development Plan Document – One of a family of documents which sets out the land allocations and spatial planning policies for all or specific parts of the local authority

area. When approved or adopted, DPDs will form part of the Development Plan. Some DPDs may refer to areas outside a local authority boundary as there may be issues of shared interest with other local authorities.

GIS

Geographical Information System – A computer based mapping system for the capture, storage, retrieval, analysis and display of spatial information.

Green Belt

National policy designation that helps to contain development, protect the countryside and promote brownfield development and assists in the urban renaissance. There is a general presumption against inappropriate development in the Green Belt.

Green Wedge

An open green space corridor which penetrates the built up area of a settlement.

HA

Housing Association – Independent, non-profit association that provides rented or shared ownership (intermediate) housing to people unable to afford to buy their own homes on the open market, or to specific groups, such as older people or the homeless.

HBA

Habitat Biodiversity Audit – This provides the underlying baseline evidence of the type of habitats and their condition based on recognised national survey methodology.

HMA

Housing Market Area – Provides information on the level of need and demand for housing and the opportunities that exist to meet it across a defined area.

Health

Health is a state of complete physical, mental, and social well-being and not merely the absence of disease or infirmity. (World Health Organisation, 1946)

LBAP

Local Biodiversity Action Plan – This outlines how landowners, land-managers and policy makers will protect the characteristic wildlife and landscapes of an area.

LDD

Local Development Document – This includes two types of documents: Development Plan Documents (DPD), and Supplementary Planning Documents (SPD)

LDF

Local Development Framework – Comprises a portfolio of documents, including a core strategy, proposals and a series of Area Action Plans, which collectively will deliver the spatial planning strategy of a local planning authority.

LDO

Local Development Order. Enables specified development or use/s of land and buildings that would normally need planning permission to go ahead without planning permission. Essentially extends 'permitted development' but only to the extent specified in the Order.

LDS

The Local Development Scheme is a public statement of the Council's 3 year programme for the preparation of Local Development Documents which will form the Local Development Framework (LDF).

LNR

Local Nature Reserve – Places with wildlife or geological features that are of special interest locally. LNR is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949.

LTP

Local Transport Plan – Local Authority Transport strategy.

NERC Act

The Natural Environment & Rural Communities Act 2006 – Designed to help achieve a rich and diverse natural environment as well as thriving rural communities through modernised and simplified arrangements for delivering Government policy.

NLP Study

Nathaniel Lichfield and Partners Retail Study

– This study provides assessments of the Coventry City Centre's shopping role and predictions for growth in capacity.

NPPF

National Planning Policy Framework. This is the amalgamation of the Planning Policy Guidance (PPG), Planning Policy Statements (PPS), and various Ministerial Statements into a single, streamlined volume.

Park and Ride

Facility, which provides parking for cars, and an Interchange for transferring passengers onto public transport, particularly at approaches to or outskirts of a city.

PDL

Previously Developed Land – See Brownfield.

Planning Obligation

Legal agreements between a planning authority and a developer to ensure that certain works which are necessary and relevant to a development are undertaken or financial contributions made to facilitate associated infrastructure works and development.

PPS

Planning Policy Statements – National policy statements, which will eventually replace Planning Policy Guidance Notes (PPGs).

RCS

Regional Centres Study – Undertaken by the former Regional Assembly as part of the Phase 2 Revision of the RSS with recommendations for the definition of Centres and targets for comparison shopping, office, commercial & leisure floorspace across the region.

RSPB

Royal Society for the Protection of Birds – Charity which promotes the conservation of birds and other wildlife through the protection and re-creation of habitats

RSS

Regional Spatial Strategy – Prepared by Regional Assemblies and approved by Government and forms part of the Development Plan. It sets out how a region should develop in spatial terms over a long-term time frame.

RZ

Regeneration Zones – Areas identified at regional or sub regional level to reduce disparities within the sub region to ensure opportunities to all communities.

Saved Policies

The City Council 'saved' most of its policies from the Coventry Development Plan 2001. These will remain in force until they are replaced by policies within the LDF.

Sequential Approach

Planning principle that seeks to identify, allocate or develop certain types of locations of land before others.

SHLAA

Strategic Housing Land Availability Assessment – Replaces the Urban Capacity Studies and makes an assessment of the amount of land that is available for housing development.

SPD

Supplementary Planning Document – These are LDD documents (Local Development Document) that provides further detail of policies and proposals in a 'parent' Development Plan Document. Not subject to external scrutiny and without the status of DPDs, but are a material consideration in the evaluation of planning applications. They will replace Supplementary Planning Guidance (SPGs).

SCS

Sustainable Community Strategy – Sets out the strategic vision for an area; identifies priorities for action; identifies how agencies and organisations are addressing the issues and may identify additional initiatives to be undertaken.

SSSI

Sites of Special Scientific Interest – An area of land identified and protected by Natural England as being of special nature conservation interest nationally.

SuDS

Sustainable Drainage Systems – Absorb rainfall and release it gradually, improving drainage and reducing the risk of flash flooding.

Sustainable Development

Development that meets the needs of the present, without compromising the ability of future generations to meet their own needs.

Sustainable Transport

Modes of transport which are less damaging to the environment than cars including public transport, walking and cycling.

Trunk Road

Motorway or other major road providing a long-distance through route between the main urban areas and other major destinations.

Windfall Site

Site not specifically allocated for development in a Development Plan, but which unexpectedly becomes available for development during the lifetime of a plan.

WBRC

Warwickshire Biological Records Centre – Source of information on species distribution and ecological sites in Warwickshire, Coventry and Solihull.

Other

Use Classes Order 1987

The Town and Country Planning (Use Classes) Order 1987 (amended) puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same Use Class.

Use Classes

A1 Shops

A2 Financial & Professional Services

A3 Restaurants & Cafes

A4 Drinking Establishments

A5 Hot Food Takeaway

B1 Business (can be subdivided into B1a: Offices, B1b: Research and Development and B1c: Light Industry)

B2 General Industrial

B8 Storage & distribution

C1 Hotels

C2 Residential Institutions

C2A Secure Residential Institution

C3 Houses and flats

C4 Houses in Multiple Occupation

D1 Non-residential institutions

D2 Assembly & Leisure

Sui Generis

A use, which is not within any specific Use Class and for which any change of use, will require planning permission

**Coventry Local Development
Plan**

Appendix 3

Coventry Greenspace Minimum Standards

Core Strategy Submission Draft

Parks and Open Spaces

Coventry Greenspace Minimum Standards:

Quantity	Quality	Accessibility
<p>Standard for Parks The quantity standard for parks should be 0.69 hectares per 1000 population</p> <p>Standard for Open Space (Principal Open Space, Incidental Open Space, Ornamental Areas): The combined quantity standard should be 2.44 hectares per 1000 population Broken down as:</p> <ul style="list-style-type: none"> • Principal Open Space Provision standards should be 0.69 hectares per 1000 population • Incidental Open Space standards should be 1.79 hectare per 1000 population • Ornamental Areas standards should be 0.01 hectares per 1000 population 	<p>The appropriate quality score for the Premier and Country Park should be to Green Flag Award Standard. Five other parks should also meet Green Flag Award Standard. The appropriate quality score for Area Parks and Neighbourhood Parks should be 50% and a quality rating of Good. The standard for Open Space should be between 46% - 60%</p>	<p>Parks above 20ha in size within a travel distance threshold of 2000m.</p> <p>Area Parks 2 – 20 ha in size within a travel distance threshold of 800m.</p> <p>Neighbourhood parks and Principal Open Space within a travel distance threshold of 400m.</p> <p>Incidental Open Space or an Ornamental Area within a travel distance threshold of 400m</p>

Outdoor Sports

Coventry Greenspace Minimum Standards:

Quantity	Quality	Accessibility
<p>The standard for outdoor sport is 1.80 hectares per 1000 population. With 0.77 hectares provided as sports grounds; and 1.03 hectares per 1000 population as outdoor sport.</p>	<p>Grass pitches to achieve a minimum standard of 66% or Good. Changing and showering facilities should be provided.</p>	<p>No Person should live more than 1200 metres from their nearest outdoor sports facility.</p>

Accessible Natural Green Space

Coventry Greenspace Minimum Standards:

Quantity	Quality	Accessibility
1.75 hectares per 1000 population of accessible natural green space according to a system of tiers into which the different sizes will fit. A natural green space within 300 metres of home. One accessible 20 hectares site within 2 kilometres of home. One 100 hectares site within 5 kilometres of home. One 500 hectares site within 10 kilometres of home.	The standard for designated Local Nature Reserves should be between 46%-60% or Good. The standard for accessible natural green space should be between 46%-60% or Good.	No Person should live more than 300 metres from their nearest natural green space. One accessible 20 hectares site within 2 kilometres of home. One 100 hectares site within 5 kilometres of home. One 500 hectares site within 10 kilometres of home.

Allotments

Coventry Greenspace Minimum Standards:

Quantity	Quality	Accessibility
The standard for allotments is 0.38 hectares per 1000 population.	The proposed standard for allotment is 60% minimum quality rating.	No Person should live more than 1200 metres from their nearest allotment site.

Churchyards and Cemeteries

Coventry Greenspace Minimum Standards:

Quantity	Quality	Accessibility
No quantitative standard set.	The proposed standard for Cemeteries is 76% plus or to an excellent standard.	No standard set.

Provision for Children and Young People

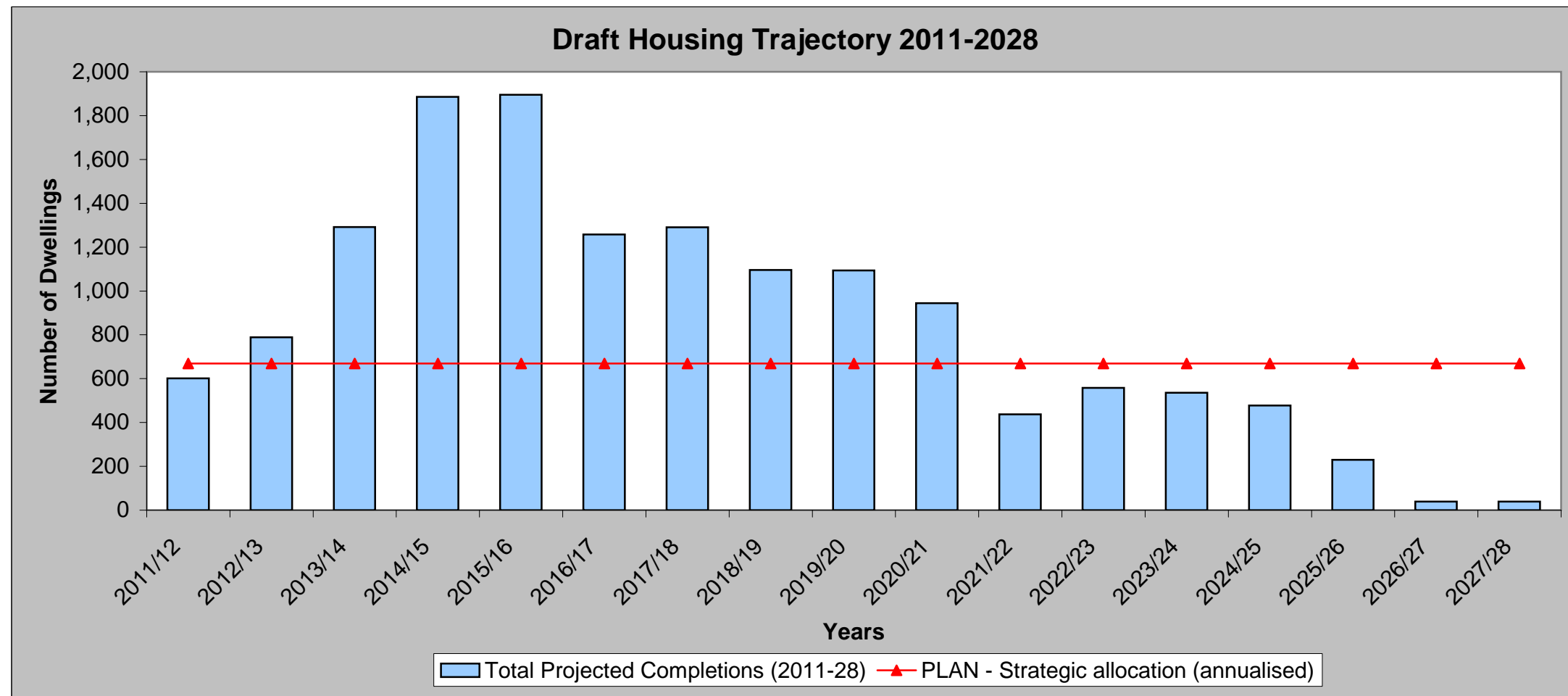
Coventry Greenspace Minimum Standards:

Quantity	Quality	Accessibility
0.10 hectares per 1000 population of fixed and natural play provision.	<p>Reasonably close to home and within sight of main travel routes across site. Located with informal surveillance from surrounding property or other well used facilities or public spaces.</p> <p>Sited in places identified in agreement with local children and young people. Be seen as part of the local community infrastructure. Provide the opportunity for risk through design and choice of equipment and landscaping.</p> <p>Provide opportunities for children of all abilities. In addition all equipment should comply with recognised European standards BSEN 1176 for fixed equipment and BSEN 177 for Impact absorbing surfacing.</p> <p>Provision for teenagers should provide variety of expectation and enable young people to sit or take exercise in a safe and clean environment.</p> <p>All sites to be maintained to a good standard of 60% or above.</p>	<p>No child or young person should live more than 400 metres from space provided for informal play.</p> <p>A Neighbourhood Equipped Area for Play (NEAP) standard play area within 1000 metres of home.</p>

Appendix 4 - Draft Housing Trajectory 2011-2028

New Core Strategy Requirement (2012).	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Projections for Areas of Identified Supply																		
Sites With Planning Permission	162	510	746	1,117	895	1,026	571	396	249	251	165	243	180	180	50	0	0	6,741
Sites Under Construction	306	140	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	447
SHLAA Sites	133	74	496	719	950	163	637	616	776	599	83	101	142	133	66	0	0	5,688
Outstanding CDP Allocations	0	65	50	50	50	0	13	15	0	25	0	0	0	0	0	0	0	268
Small Site Windfall Allowance	0	0	0	0	0	39	39	39	39	39	39	39	39	39	39	39	39	468
City Centre Broad Location	0	0	0	0	0	0	0	0	0	0	150	175	175	125	75	0	0	700
Education - SEN Broad Location	0	0	0	0	0	30	30	30	30	30	0	0	0	0	0	0	0	150
Totals and Assessment																		
Total Projected Completions (2011-28)	601	789	1,292	1,886	1,895	1,258	1,291	1,096	1,094	944	437	558	536	477	230	39	39	14,462
Total Cumulative Completions (2011-28)	601	1,390	2,682	4,568	6,463	7,721	9,012	10,108	11,202	12,146	12,583	13,141	13,677	14,154	14,384	14,423	14,462	-
PLAN - Strategic allocation (annualised)	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	669	11,373
PLAN - Strategic allocation (cumulative)	669	1,338	2,007	2,676	3,345	4,014	4,683	5,352	6,021	6,690	7,359	8,028	8,697	9,366	10,035	10,704	11,373	11,373
MONITOR - Number of dwellings above or below cumulative allocation	-68	52	675	1,892	3,118	3,707	4,329	4,756	5,181	5,456	5,224	5,113	4,980	4,788	4,349	3,719	3,089	3,089
MANAGE - Annual requirement taking account of past and projected completions	673	666	621	523	409	332	236	141	21	-110	-202	-354	-576	-927	-1,506	-3,050	-3,089	-

NB: Total Supply is based upon the supply position at April 1st 2011. This is scheduled to be updated when data is available.





Appendix 5: Green Belt Boundary Amendments – Inset Maps (to support Policy GB1)


The following plans set out areas of the city where amendments to the Green Belt boundary are proposed in accordance with Policy GB1 of the Councils submission draft Core Strategy (July 2012). The table below provides the supporting information for each of the sites and should be read alongside the inset maps.

Site Name	Ward	Type of Boundary Change	Reason for Change
Coundon Wedge - Land North of the former Jaguar Factory, Browns Lane	Bablake	Land returned to Green Belt	Site previously removed from Green Belt to facilitate specific industrial expansion. This is no longer required due to other land use changes.
Land West of Petitor Crescent (Part of NDC Regeneration Scheme)	Henley	Boundary realignment	Current boundary appears illogical. Following the development of Phase 1 of the NDC regeneration scheme the amendment creates a new defensible boundary line.
Former Power Station site, Alderman's Green	Longford	Land removed from Green Belt	Derelict land situated within the Green Belt. Potential development could promote environmental improvements and enhance the Green Belt setting.
Land east of Lucerne Close	Longford	Boundary realignment	Current boundary appears illogical. Amendment creates a new defensible boundary line.
Land rear of Jephson Court, Alderman's Green Road	Longford	Boundary realignment	Current boundary appears illogical. Amendment creates a new defensible boundary line.
Industrial Land off Alderman's Green Road	Longford	Land removed from Green Belt	Inappropriate site situated within the Green Belt, suggesting original boundary abnormality. Potential redevelopment could promote environmental improvement and enhance the Green Belt setting.
Sherbourne Fields School	Sherbourne	Land removed from Green Belt	Amendment of the boundary creates a more logical and defensible boundary, which removes a well developed school site from the Green Belt.
Land at Westwood School & Technology College	Westwood	Boundary realignment	Current boundary appears illogical. Amendment creates a new defensible boundary line, adding new land to the Green Belt.
Land at Poundgate Lane & Guinea Crescent	Westwood	Boundary realignment	Current boundary appears illogical. Following the Westwood Heath development the amendment creates a new defensible boundary line.
Caludon Castle School	Wyken	Boundary realignment	Current boundary appears illogical. Following the redevelopment of the school the amendment creates a new defensible boundary line.

Inset Maps – Key

 Existing Green Belt

 Land to be removed from Green Belt

 Land to be added to Green Belt

Coundon Wedge - Land North of the former Jaguar Factory, Browns Lane.



Land West of Petitor Crescent (Part of NDC Regeneration Scheme)



Former Power Station site, Alderman's Green



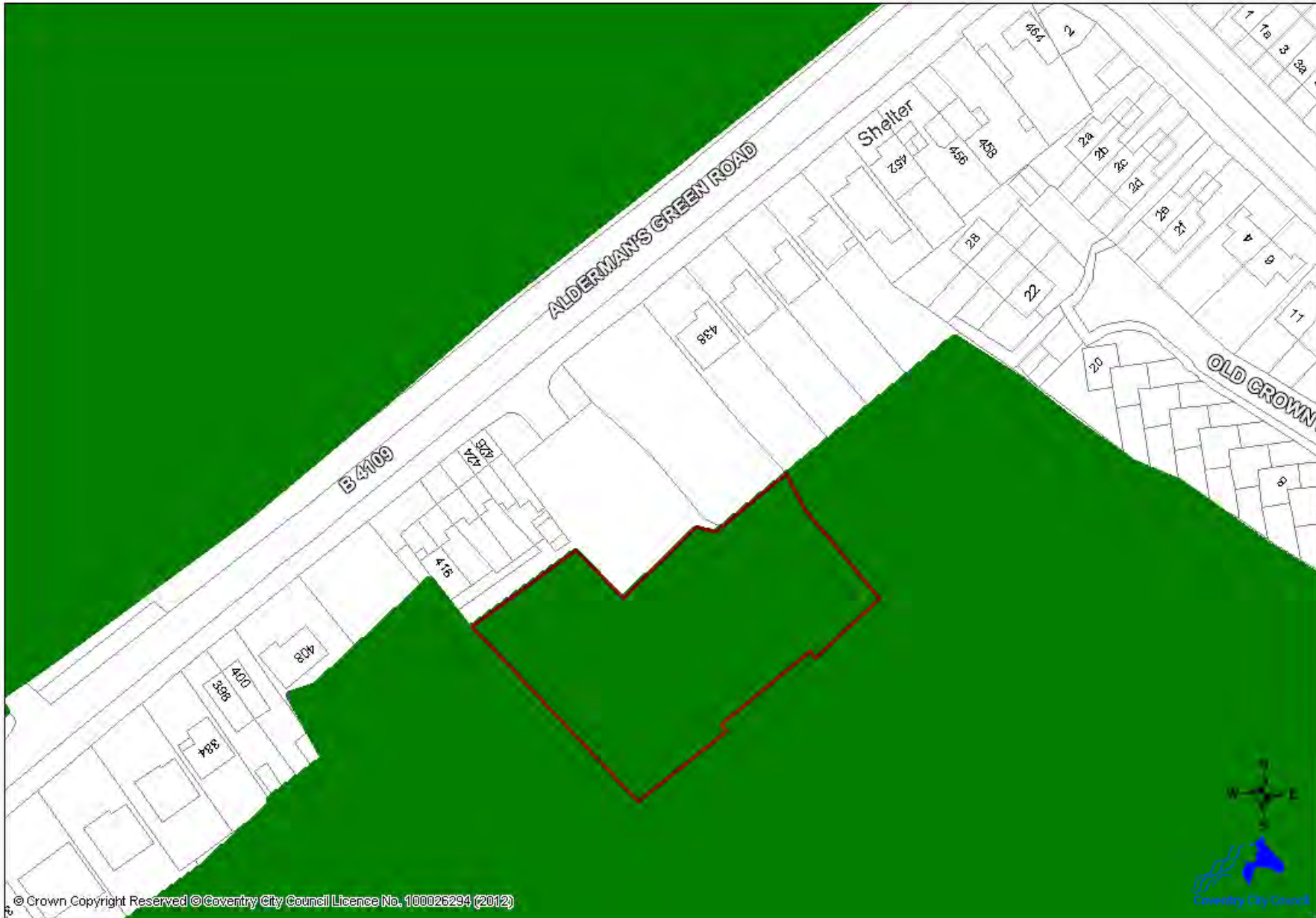
Land East of Lucerne Close



Land rear of Jephson Court, Alderman's Green Road



Industrial Land off Alderman's Green Road



Sherbourne Fields School



Land at Westwood School and Technology College

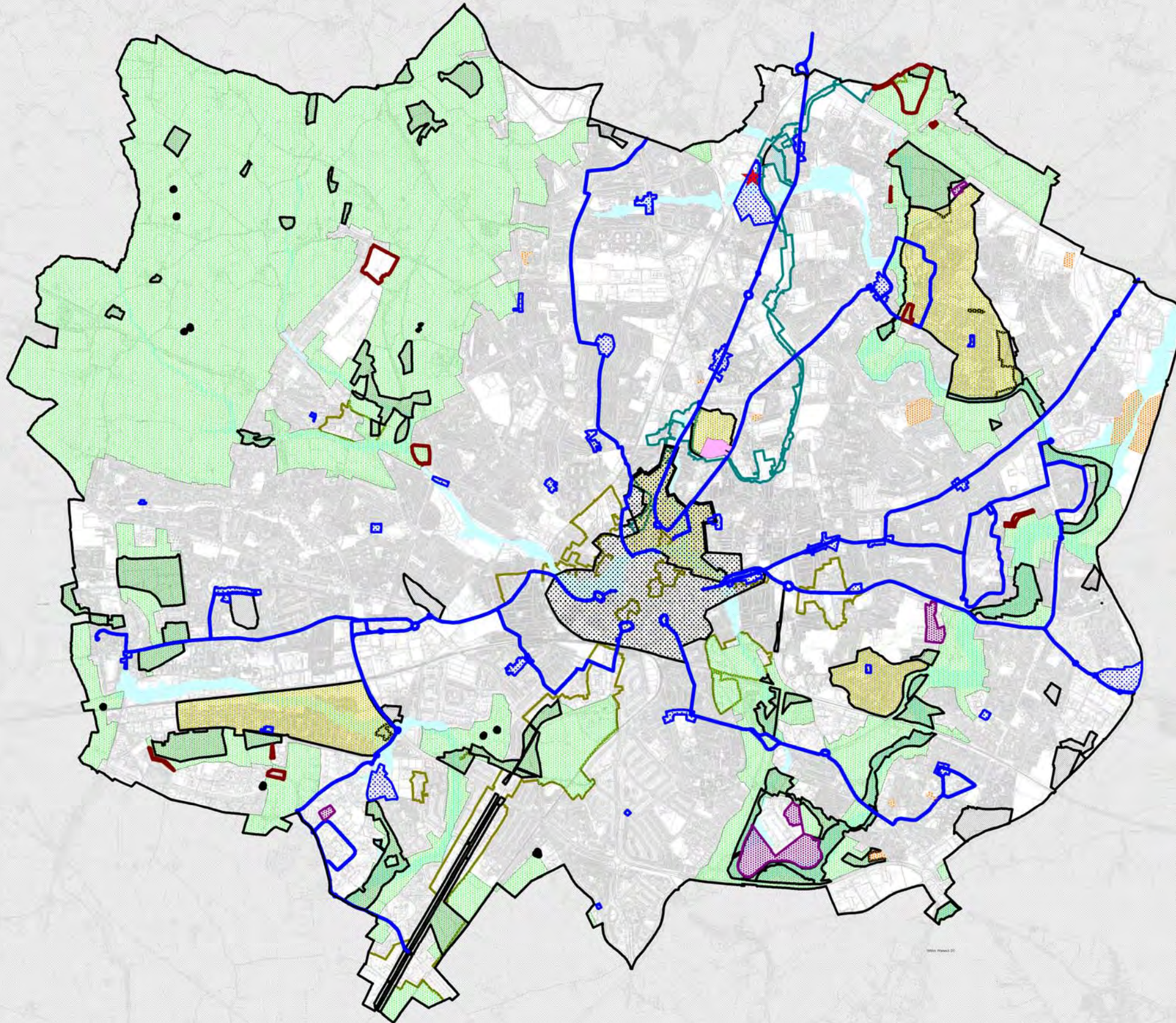


Land at Poundgate Lane and Guinea Crescent



Caludon Castle School





-  Hub (City Centre Inset)
-  Strategic Regeneration Areas
-  Defined Centres
-  'Saved' outstanding employment allocations
-  'Saved' outstanding housing allocations
-  'Saved' outstanding mixed use allocation
-  Flood Plain
-  Existing Green Belt
-  Proposed amendments to Green Belt boundaries
-  SSSI/Local Wildlife Site
-  Conservation areas
-  Canal Conservation Area
-  Ricoh Railway Station
-  Bus Showcase Route

Appendix 2: Summary of responses received to the “Proposed Core Strategy” consultation of autumn 2011

There were a total of 96 responses received during the consultation period.

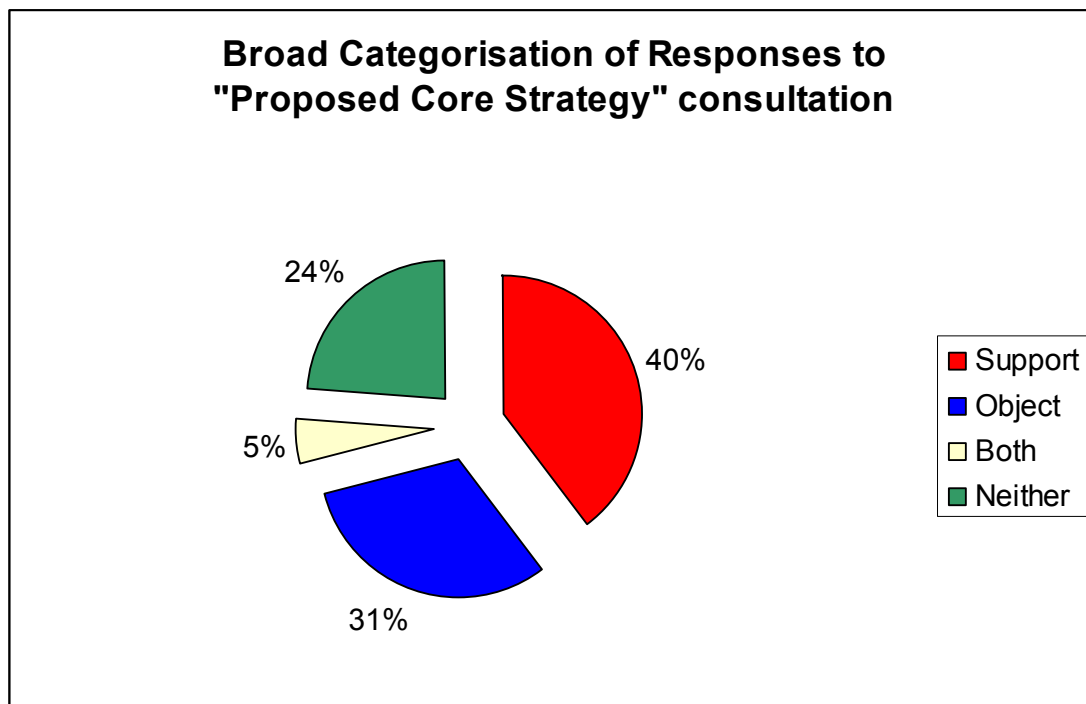
Broadly speaking, those who objected were developers, or representing developers, who are promoting Green Belt / Greenfield land for development.

Conversely, most of those who expressed support were individuals, or amenity societies.

A small number broadly supported the overall strategy, but had specific objections to points of detail or special interest to them. These are counted as "both" on the chart below.

Finally, nearly a quarter of responses did not clearly express a view as to whether they support the strategy or not, so these are shown as "neither" in the chart below.

There was no overall majority, but the largest proportion of responses expressed broad support for the strategy.



Appendix 3: Summary of responses received to the “Options for a new housing target for Coventry 2011 – 2028” consultation of spring 2012

There were a total of 195 responses received during the consultation period, of which 165 completed the on-line survey, and 30 emailed responses.

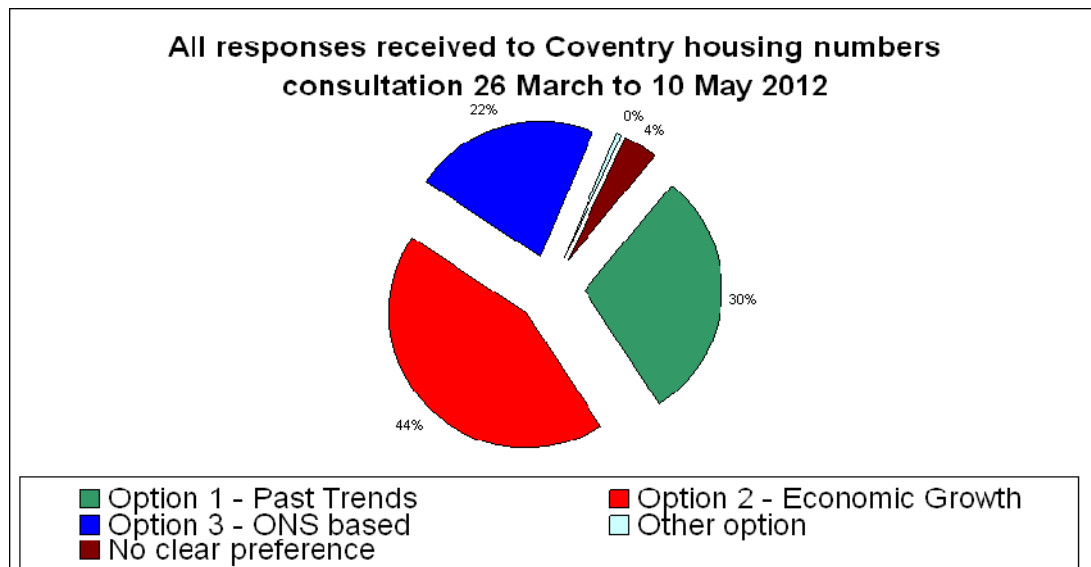
Option 1 was 9,690 new homes in Coventry between 2011 and 2028 (past trends between 1991 and 2011, projected forward pro-rata)

Option 2 was 11,373 new homes in Coventry between 2011 and 2028 (assuming the economy will grow by 5.2%)

Option 3 was 20,655 new homes in Coventry between 2011 and 2028 (applying minor tweaks to the ONS household projections which assume that the decline in average household size [on average across the country as a whole that has been seen since 1971] will continue in a straight line, as well as the boom in migration that was experienced for a short period during the mid-2000's will also continue throughout the whole of the plan period)

The other option was an alternative model, known as the Chelmer Model, that was used by developers at a recent appeal in Coventry but was not considered by the Inspector in that case to be sufficiently robust.

A number of other responses did not choose an option at all, either because they were technical issue responses concerning level crossings, for example, or because they attacked the consultation itself without offering a realistic alternative. These are all considered to be "no clear preference".





Statement of Community Involvement

July 2012

This is a revision of the Council's Statement of Community Involvement (SCI) adopted in November 2006. A revision is necessary to reflect the changes to the Planning Regulations since the original SCI was introduced and sets out the different stages of the Coventry Local Development Plan (CLDP) production and new methods of consultation for community involvement.

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1.0 Introduction

1.1 Coventry City Council wants local people and organisations to be more involved in plans for their community whether in long term visions for their area or in specific planning proposals.

Purpose

1.2 The purpose of this Statement of Community Involvement is to set out the Council's policy for involving the community in the preparation and revision of all Local Development Documents and in consultations on planning applications. The Statement of Community Involvement:

- is a clear public statement enabling the community to know when and how they can get involved in the preparation of local development documents, and how they will be consulted on planning applications.
- sets out the standards to be achieved and how the minimum legal requirements for consultation will be met or exceeded.

1.3 Effective community involvement in the planning system brings several benefits. Involvement can:

- help to promote planning as a strategic, proactive force for delivering sustainable development.
- lead to outcomes that better reflect the views, aspirations and needs of the wider community in all its diversity.
- improve the quality and efficiency of planning decisions, by drawing on local knowledge and possibly reducing potential conflict.
- promote social cohesion by making connections with communities and offering them a tangible stake in decision making.

Scope

1.4 The Statement of Community Involvement covers:

- consultation arrangements for the preparation and review of all Local Development Documents in the Local Development Framework, whether they are development plan documents or supplementary planning documents.
- arrangements for consulting on all new developments before and after planning applications have been submitted.

1.5 The Statement of Community Involvement also informs consultations on changes to the public realm (streets, squares, paths, parks) carried out by the Council, whether or not planning permission is required and the development of new public buildings.

1.6 The Statement of Community Involvement does not directly cover consultation on matters not to do with spatial planning. However, it does cover the co-ordination of consultation on spatial planning with consultation on other matters.

Vision – why we need a Statement of Community Involvement

1.7 In endorsing this Statement of Community Involvement, Coventry City Council expects to fulfil a vision:

Our vision is a city where:

- people and organisations from all backgrounds and communities are able to engage in planning for sustainable development.
- the knowledge and foresight of residents and planners is combined to prioritise and detail planning policy to meet current and future needs.
- all stakeholders, elected members and officers have a high level of awareness of planning policy and processes and built environment quality issues.
- highly skilled staff with a commitment to community engagement facilitate an open, transparent and accessible process.
- shared values, protected in agreed policy, underlines a spirit of partnership between stakeholders.

1.8 Achieving this vision will lead to a user-friendly, attractive and sustainable city.

1.9 An inclusive approach to community involvement means understanding the makeup, needs, interests and capacity of different groups in the community. Identifying and understanding the needs of groups will enable consultation programmes to be designed in a way that makes it easier for people to engage with the planning system.

1.10 Our vision for engaging ‘organisations of Coventry’ embraces public, private, voluntary and community sectors, including businesses, associations, groups and agencies of all kinds either based in, or having an impact on the city.

1.11 Sustainable development is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. A key requirement of sustainable development is the effective involvement of local people, groups and businesses in the planning of their community.

Objectives – what we are aiming to achieve

1.12 Coventry’s Statement of Community Involvement has five objectives. These objectives say what we aim to do to fulfil our vision of engaging people and organisations in planning Coventry’s future. We aim:

- to help make the planning system transparent, by making plans, policies, development proposals and planning decisions available in a form which is easily understood and accessible to all.
- to make the planning system proactive by combining the knowledge of residents and planners to provide greater foresight in anticipating and satisfying future needs for planning policy.
- to promote participation and involvement by presenting clear opportunities for people to make their views known and to take part in the planning process, and by demonstrating that people’s views have been considered by decision-makers.

- to make the planning system accessible and inclusive, by removing barriers to involvement and by reaching out to groups that have been less engaged in the past.
- to be accountable, by clearly identifying decision-makers and processes and ensuring that people get feedback about progress and outcomes.

1.13 The schedule of previous consultation activity and partnership meetings that have been undertaken in respect of Coventry's developing SCI include:

- SCI informal consultation (21.04.05 – 16.05.05) – 'Have Your Say' questionnaire.
- The Council and the Equalities & Communities Local Strategic Partnership Theme Group meeting (24.05.05) – Draft SCI presentation and discussion.
- Draft SCI Pre-submission public participation (04.07.05 -15.08.05).
- The Council and Community Empowerment Network (CEN) meeting (25.07.05) – Draft SCI presentation and discussion.
- The Council and Community Empowerment Network (CEN) sub group meetings (14.09.05, 21.11.05 and 20.12.05) – Towards a revised draft of the SCI.
- Submission Draft SCI public consultation (10.04.06 – 22.05.06).

Why review the SCI now?

1.14 Central government guidance in the form of the National Planning Policy Framework means that Coventry City Council has to use this document to prepare its plans. The government guidance made reference to the SCI to better help engage with the public, developers and any other interested party in the development of their local area.

1.15 The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 introduced important new changes to the system on how to consult with the community and other stakeholders. Coventry's existing SCI which was adopted in November 2006 requires reviewing and updating so that it takes into account the new guidelines from central government.

1.16 The key principles of the SCI remain the same but the major areas of change in light of the National Planning Policy Framework:

- Changes to the process for preparing Development Plan Documents (Chapter seven);
- Changes to the planning application stage now incorporated information on public involvement in planning obligations (Chapter eight), and
- The tests of soundness have changed from nine tests to four.

2.0 Background

The new planning system

2.1 The Government introduced a new planning system through the Planning & Compulsory Purchase Act 2004. Under this new system Coventry's Development Plan will be replaced by a Local Development Framework. This will consist of a family or a portfolio of Local Development Documents, which together provide the framework for delivering the spatial planning strategy for the area. These include:

- Local Development Scheme
- Core Strategy
- Development Plan Documents
- Area Action Plans
- Supplementary Planning Documents
- Annual Monitoring Report
- Statement of Community Involvement

(Please refer to Appendix E, which explains the meaning of these terms).

2.2 As part of the Coventry Local Development Plan, each local planning authority is required to prepare a Statement of Community Involvement. The Statement of Community Involvement is essentially a document setting out the processes for involving Coventry's stakeholders, residents and community groups in influencing new plans, policies and decisions in respect of specific development proposals.

2.3 The Statement of Community Involvement seeks a 'step change' towards creating a more proactive and inclusive planning system. The Coventry Statement of Community Involvement has gone through a number of stages to ensure that the community has been involved throughout the process to adoption. Like all development plan documents, the Statement of Community Involvement has to be tested for its 'soundness' before it can be adopted. An independent Inspector was appointed to hear any issues relating to 'soundness'. The Statement of Community Involvement forms part of the Coventry Local Development Plan. Figure 1 illustrates the main stages in the preparation of the Statement of Community Involvement.

The tests of soundness

2.4 When considering the submitted Statement of Community Involvement, the Planning Inspectorate considered whether the Statement of Community Involvement was 'sound' against the following criteria:

- Shows how the authority meets its legal requirements
- Links with other community initiatives
- Identifies groups/bodies to be consulted
- Shows how local people, community and voluntary groups and others will be involved in the Local Development Document process
- Sets out appropriate involvement techniques

- Identifies resources for community involvement
- Demonstrates how involvement will feed into Local Development Document preparation
- Sets out mechanisms for reviewing the Statement of Community Involvement procedures.

2.5 The Inspector began with the presumption that the Statement of Community Involvement was 'sound' unless shown to be otherwise in evidence. Please visit the Planning Inspectorate website for more information in assessing the soundness of Statement of Community Involvements: www.planning-inspectorate.gov.uk

2.6 All representations relating to the submitted Statement of Community Involvement were reported to the Planning Inspectorate. An independent Inspector was appointed and an Examination took place to consider the views of partners before reaching a view. This view is binding, and, subject to several recommendations, the Council's Statement of Community Involvement is sound.

Sustainability Appraisal and Strategic Environmental Assessment

2.7 The Sustainability Appraisal of all Development Plan Documents and Supplementary Planning Documents will incorporate the requirements of the EU Strategic Environmental Assessment Directive, which aims to assess the likely significant environmental effects of plans and programmes.

2.8 The purpose of undertaking a Sustainability Appraisal is to promote sustainable development through better integration of the social, economic and environmental considerations into plans. A Sustainability Appraisal is integral to plan making and the Coventry Partnership's Environment Theme Group will be actively engaged in this process and other groups will be welcome to contribute.

How the Statement of Community Involvement affects the planning process

2.9 The Council, as local planning authority, must comply with the standards of consultation contained in the adopted Statement of Community Involvement when preparing and reviewing relevant documents in the Local Development Framework and in considering planning applications. The Council will therefore meet not only the minimum standards set by Regulations but also undertake a wider range of community involvement as described in later sections.

2.10 The Regulations state that all Development Plan Documents and Supplementary Planning Documents must be accompanied in their final stages by a statement of compliance. The statement must set out who has been involved, how they were consulted, a summary of the issues raised and how those issues have been addressed.

2.11 Failure to meet the standards as set out in the adopted Statement of Community

Involvement could result in Development Plan Documents being unable to progress through to adoption and leave Supplementary Planning Documents open to challenge. The primary test for Development Plan Documents when subject to Examination is that they are 'sound', as defined in Government guidance.

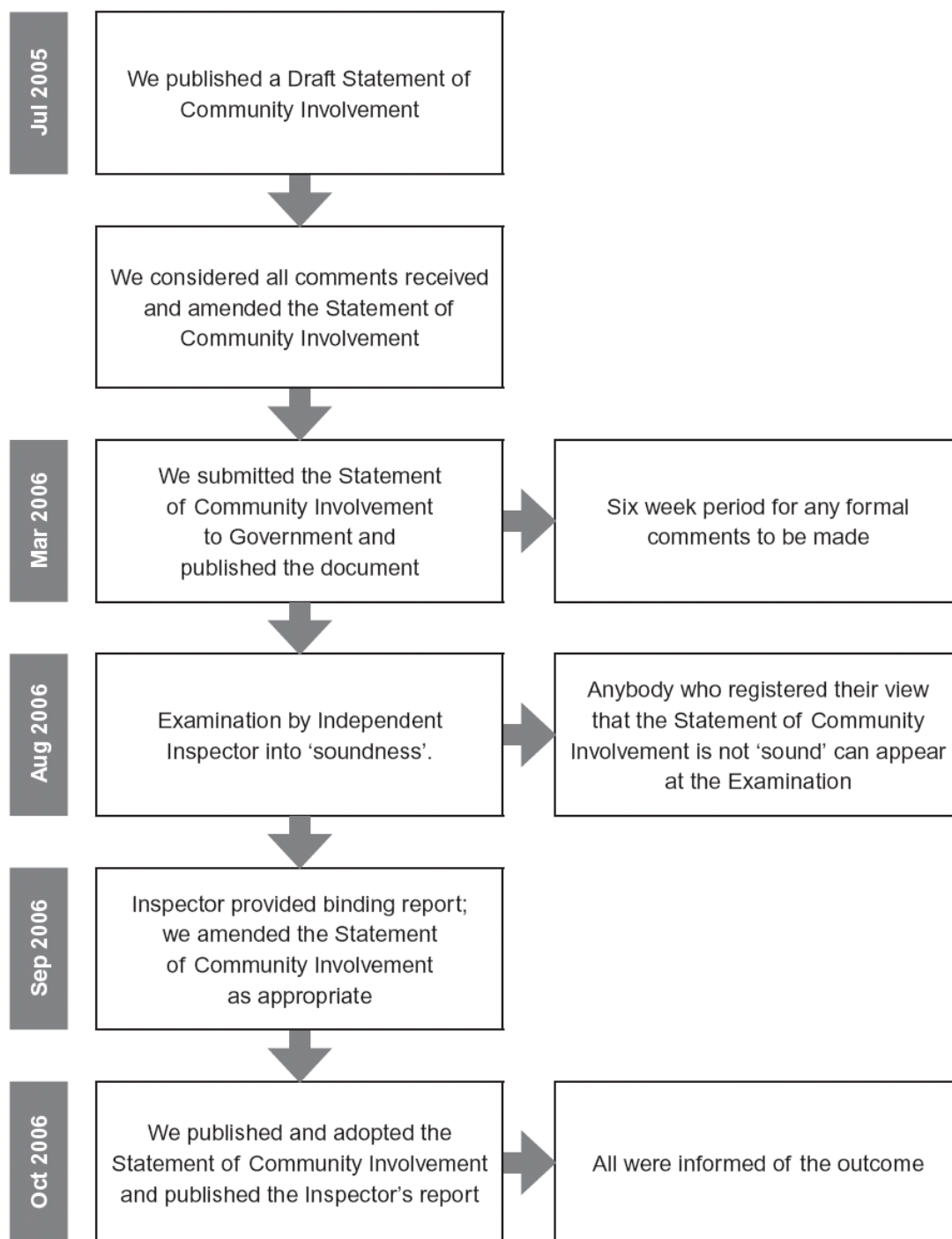
2.12 In respect of planning applications the Regulations set minimum requirements for notification of applications through site notices and in some instances press notices.

2.13 This Statement of Community Involvement provides information on the key principles that would underpin involvement. It is not intended that the Statement of Community Involvement should prescribe consultation and participation approaches for every situation. It does aim to set a 'menu' of possible approaches that may be used over time and explains the arrangements for choosing from that 'menu'. Feedback from consultations will help partners to evaluate which approaches are most effective in different circumstances.

2.14 The Statement of Community Involvement reinforces the importance of the Council's active approach to involvement in planning, including the value the Council places on the contributions from a wide range of people within the community.

2.15 Greater and more satisfactory involvement in the planning process will be achieved if more of Coventry's citizens, particularly those in positions of leadership in their communities, are conversant with the planning system, consultation principles and techniques and built environment quality issues. The Council is committed to working with all its partners to develop proposals and identify resources for community capacity building.

Figure 1: Main Preparation Stages of the Statement of Community Involvement



3.0 Coventry's Community Profile

Area and Population

3.1 The most recent data from the ONS estimated the total population of Coventry in 2009 to be 312,800 people. Significant growth in the population size of Coventry is forecast by the ONS; it is projected to reach 324,400 in 2014. This growth rate of 3.7% over 5 years is broadly in line with the national population growth rate, but the population of Coventry is expected to grow faster than comparable urban areas in the 5 years up to 2014.

Ethnicity and Religion

3.3 Just over a quarter of the population in Coventry are from Black and Minority Ethnic (BME) Groups (26% in 2007). In the same year about a third of children in Coventry's schools were from a BME background; by 2009-10 Coventry's school population had become more diverse still. The younger age structure of the BME communities in Coventry means that ethnic diversity is set to increase and it is estimated that by 2031 just over a third (35%) of the city's population will be people with a BME background.

3.4 People identifying themselves as Christian stand at 65%. The next largest group is people with no religion at 15%, followed by Sikhs at 5%, Muslims at 4% and Hindus at 3%. There is a small Buddhist community at 0.3% and a Jewish community at 0.1%.

Communications and Travel

3.5 Coventry is at the centre of the UK with direct access to five motorway links serving the whole of the UK road network. Of the total number of people who have jobs in Coventry, 66% live in the City. Of those commuting in, 25% come from Nuneaton and Bedworth, with only 1% using the train service.

3.6 Coventry Airport offers flights across Europe and also operates a service for businesses together with a cargo facility. London is one hour away by train with Coventry situated on the busiest Intercity line in the country.

Jobs and Employment

3.7 In 2004, Coventry had 29% of its labour force in the top three Managerial Professional categories compared to 36% for the West Midlands and 41% for the UK. There are 145,000 jobs in the City, compared with 146,000 in 1981. During the last 25 years jobs in manufacturing have decreased from 38,500 to 18,400, whilst jobs in distribution, hotels and business services have increased from 24,000 to 39,900.

3.8 The number of jobs created in Coventry over the last three years is 5,800 (at Prologis Business Park, Tesco, Ricoh Arena, TUI at Coventry Airport, Westwood Business Park and the NHS Institute for Learning, Skills and Innovation). The latest figures reveal 131,000 (74%) economically active residents of the City are in

employment compared to 123,000 (66%) in 1995. The average household income is £27,700 compared to a national average of £31,000.

Housing

3.9 There are 122,400 households living in a range of accommodation from executive properties to starter homes and City Centre apartments. In 2005, there were 4,970 vacant dwellings in Coventry.

3.10 The 2001 Census figures show there were marked trends in household composition with households with married or cohabiting couples with dependent children forming a minority of around 20% of households. The number of one-person households stood at 31%, which was higher than in Warwickshire or the West Midlands. More than half of these were non-pensioner households. Lone parents headed 8% of households.

3.11 There were marked contrasts between prosperous and less prosperous wards in Coventry. Bablake had the highest number of pensioner single households at 19%, but were significantly below the city average for non-pensioner single households at 12%. By contrast, St Michaels had one of the lowest rates of pensioner households at 12% but the highest rate of non-pensioner households at 25%.

4.0 Principles

4.1 The principles of good community engagement in planning are widely recognised and documented. The principles set out below aim to underpin the involvement strategy of the Local Development Framework and in determining planning applications. The principles have been developed through the Coventry Community Plan, Coventry Corporate Plan, National Policy Statements and examples of good practice across the City and beyond in planning and regeneration activities.

Early engagement

4.2 'Front-loading', beginning consultation at the earliest opportunity, will ensure that people recognise they have the opportunity to make a difference to plans and proposals, and that they experience a sense of ownership throughout the planning process. It is not sufficient to invite people to comment once proposals have been worked up. Involvement at the formative stage of policy development and review or a particular development proposal, is essential to achieve a sense of community ownership over the policies that will shape the future development of the City and improve the quality of development.

Community engagement fit for purpose

4.3 Arrangements should be built on a clear understanding of the communities' needs and aspirations depending on the nature of the planning purpose. It is essential that all main interest groups and key stakeholders are aware and respect a common understanding of the approach adopted. This is particularly relevant in communities where they may be sceptical of others trying to gain territorial advantage. People will want to be involved for a variety of reasons including: curiosity, fear of change, financial gain, neighbourliness, professional duty, protection of interests or socialising. The need to recognise different agendas is important so that the consultation technique(s) employed can aim to embrace all sections of the community.

Transparency and openness

4.4 The process of consultation and people's roles should be clear and transparent at all levels of engagement so people know when they will be able to participate. Being open and straightforward about the nature of the activity will generally mean communities will participate more freely as they may have a greater understanding and trust of the process. This also means being clear about what is 'on offer'. Clear explanations as to what can and cannot be influenced and how the results will be used and what feedback will be given are essential.

4.5 The Coventry Compact Code of Practice on Consultation says:

- Be clear on the quantity and quality of consultation required and design the process accordingly.
- Be clear on how much consultation you can resource and prioritise. Check what consultation has already been done and whether it can be used.
- If a decision has already been taken, make it clear that consultation is on the impact of that decision. Concentrate on supporting those affected in managing that impact, and communicate the decision as soon as possible.
- Be clear on what options are being consulted upon and why, setting out pros and cons fairly and explaining constraints.

Building local capacity and trust

4.6 Genuine long-term community sustainability depends on developing local links and partnerships. The continuing opportunities to develop local skills and involve local people in surveying their own situation, running their own programmes and managing local assets cannot, and should not be underestimated.

Involve all those affected across all sections of the community

4.7 Planning tends to work best if all parties are committed to the process. Activities in which key players (such as landowners or planners) sit on the sidelines are all too common and rarely achieve their objectives completely. Investment in time spent winning over cynics before formal consultation can be worthwhile. If there are people or groups, who cannot be convinced at the outset, keep them informed and give them the option of joining in later on.

4.8 Planning documents need to be in plain language, satisfying clear print standards and available in different formats to encourage wide readership; paper and electronic versions will be necessary, and languages other than English, large print, audio and Braille versions should be provided on request wherever practicable. Techniques and practical arrangements need to be tailored to engage the relevant parts of the community. Locations and venues for document inspection, exhibitions and meetings must be accessible for disabled people and convenient for the target communities and neighbourhoods. Meetings must be inclusive in the way that they are organised.

4.9 The Coventry Compact Code of Practice on Consultation says:

- Recognise and be creative about the barriers that keep people out of consultations, such as the timing of the consultation meetings or language barriers. Use local people as peer researchers to access voices which are often missed, don't just rely on meetings with the usual consultees.
- Identify and involve a broad cross section of those who will be affected.

Employ a mixture of methods

4.10 The choice of involvement methods will be crucial, as different people will want to take part in different ways. For instance, some will be happy to write letters, others will prefer to make comments at an exhibition or take part in workshop sessions. A flexible approach needs to be adopted in selecting different techniques and methods of engagement. There is also a need to consider which people may be affected and how people will get involved, what facilities are available and how to work with agencies such as Planning Aid to help communities let their voice be heard.

4.11 Use independent agencies to organise consultation where a statutory agency has a vested interest in one particular outcome.

Building consensus and accepting disagreement

4.12 The process of engagement aims to build as wide as possible consensus around plans for the future of the City and individual development proposals. It is recognised, however, that the nature of planning involves choices and implies decisions as to the weight attached to conflicting economic, social and environmental objectives. All partners enter the process understanding that consensus may not be achieved and that final plans or decisions may disappoint them. Disagreement with particular plans or decisions should not undermine the spirit of partnership or imply disloyalty to the City. It must be recognised by all that the role of Councillors is to represent the community and they are accountable through the ballot box. They have the statutory responsibility for decision making.

Provide feedback

4.13 It is essential for building trust and ensuring future engagement, as well as being a courtesy to those who have been involved, that the contribution of participants in consultation is acknowledged and that they are able to track the influence that their views had on the final outcomes.

The Coventry Compact Code of Practice on Consultation says:

"Outline the real reasons why a decision has gone a particular way, and what balance of views came across in the consultation".

4.14 The Council will produce schedules, which show its response to comments during consultations.

Monitor and evaluate consultations

4.15 It is essential that mechanisms be put in place to feedback from communities on the process of engagement, and to monitor its effectiveness and its effect on built environment quality and the efficiency of the planning system. Methods used need to be evaluated by partners to inform future practice and the possible review of this Statement of Community Involvement.

5.0 Links with Other Community Involvement Initiatives

5.1 The Council aims for a co-ordinated approach to achieving priorities through integrated strategies and initiatives. A wide range of other strategies have a bearing on the Statement of Community Involvement. At the most strategic level, are the Coventry Sustainable Community Strategy and the Council's Corporate Plan. Others range from strategies on housing to the economy.

5.2 It is recognised that we need to aim to avoid communities being overloaded with consultation. Therefore, the lessons learnt and feedback on other community engagement strategies have fed into this review of the Statement of Community Involvement.

5.3 Further details on the Council's other published strategies can be obtained from its website by accessing the following web address:

www.coventry.gov.uk

Coventry Sustainable Community Strategy (2008)

5.4 In order to develop a locally tailored approach to engagement it is necessary to understand the key planning issues facing Coventry. Accompanying the Local Development Framework is the Coventry Sustainable Community Strategy (Coventry: The Next Twenty Years) (2008).

5.5 This indicates a number of challenges with regard to community engagement based upon the demographics of the local population. They include:

- The young profile of the City. The City is young in comparison to the national profile, most probably due to the number of students living in the area. Children and young people, tend to be more difficult to engage in consultation;
- The existing ethnic diversity of the City. The City is diverse with almost one quarter (22%) of Coventry's inhabitants coming from minority ethnic communities compared to 13% for England as a whole. The largest groups are Asian and Asian British communities, which together make up 11% of the city's population, these groups are followed by White Irish (4%) and Black or Black British (2%). The larger ethnic groups are well established and networks have been created by which these communities can be engaged;
- The increasing diversity of the City. A large number of new communities are settling in Coventry, including Somalian, Polish, Kurdish, Afghani and Iraqi groups. There are over 100 languages spoken in Coventry and this can be a challenge, particularly regarding the costs of producing materials for consultation and ensuring that all groups are included; and
- Deprivation in the City is starting to decrease but is high relative to national standards. The Coventry Partnership has identified 31 priority neighbourhoods in the City that are the most disadvantaged and will require specific engagement.

Coventry Corporate Plan (2008/09 - 2010/11)

5.6 The Plan sets out the city's vision for Coventry, which is for Coventry to be:

".... **proud to be a city that works:**

- for jobs and growth
- for better pavements, streets and roads
- to support and celebrate our young people
- to protect our most vulnerable residents

We're proud to do this by....

- being honest, fair and transparent when we make decisions
- working with residents, communities and partners to get things done
- celebrating all that's good about our city and its future".

5.7 The Corporate Plan sets out the strategic direction and improvement priorities for Coventry City Council for the three years from 2008/09 - 2010/11. It shows how the council plans to work to deliver the city's vision for Coventry by providing leadership; delivering services and through working closely with our partners and local people. It builds on and updates the council's previous Corporate Plan, reflecting the progress we have made over the last twelve months.

To find out more about the council's vision, objectives and values, download the Corporate Plan 2008/09 - 2010/11.

www.coventry.gov.uk

Coventry City Council - A Strategy and Guidance for Consultation and Participation (2003)

5.8 This document was published in April 2003 and sets out the way in which the Council aims to engage with individuals, groups, businesses and the community through consultation and participation.

5.9 Although designed specifically as a guide for staff to support the Council's overall framework for Best Value, the Statement of Community Involvement interprets its provisions, as they would apply to the Local Development Framework. Links with this document will be made by:

- Ensuring that due regard has been given to the documents key principles.
- Adopting an integrated and linked approach to consultation in addressing local community issues.
- Drawing upon extensive community consultation methods.

Coventry Development Plan (CDP) – (2001)

5.10 Adopted in 2001, the CDP remains the principal land use planning document to guide the extent, form and nature of development up to 2011. Links with the Coventry Development Plan will be made by:

- Drawing upon the extensive community consultation carried out in the CDP process.

Neighbourhood Plans

5.11 The Council, led by the Neighbourhood Management service, is working with local communities to produce Neighbourhood Plans. These plans will form one of the foundation stones of Coventry's Strategy for Neighbourhood Renewal and can, where appropriate, inform the need for Area Action Plans.

5.12 We will ensure that the Local Development Framework links with neighbourhood plans by:

- Neighbourhood Action Service meeting with the Planning Service at an early stage in the development or revision of Neighbourhood Plans to ensure that existing Local Development Framework policies and plans are taken into account.
- The Planning Service having an early involvement in consultation around Neighbourhood Plans to ensure that spatial planning issues are not neglected.
- A process being developed to decide on priorities for Area Action Plans in the City and where possible, combining consultation on Area Action Plans and Neighbourhood Plans.

Coventry Compact

5.13 The Coventry Compact is an agreement on the relationship between the voluntary and community sector and the statutory sector in the City. It includes three codes of conduct covering attitudes, consultation and funding.

5.14 The Code of Conduct on Attitude and the Code of Conduct on Consultation are particularly relevant to this Statement of Community Involvement.

5.15 Links with the Coventry Compact will be made by:

- Ensuring that this Statement of Community Involvement reflects the Codes of Conduct.
- Ensuring that lessons learnt from the implementation of the Statement of Community Involvement are fed back into any future revisions of the Compact.

5.16 The Council and its partners in the community recognise that achieving the 'step change' in community involvement required by the new planning legislation represents a challenge. There have been instances of good practice in Coventry over recent years, as well as a number of recent improvements and innovations. Nevertheless, it is acknowledged that there is a perception by some groups that the principles of good community engagement have been applied inconsistently. This section describes the key measures needed to rise to the challenge.

6.0 Meeting the Challenge

6.1 The Council and its partners in the community recognise that achieving the 'step change' in community involvement required by the new planning legislation represents a challenge. There have been instances of good practice in Coventry over recent years, as well as a number of recent improvements and innovations. Nevertheless, it is acknowledged that there is a perception by some groups that the principles of good community engagement have been applied inconsistently. This section describes the key measures needed to rise to the challenge.

Who will be involved?

6.2 The various agents identified below will play an important role in supporting the successful implementation of the Statement of Community Involvement. The groups and organisations listed in Appendix A, some of which are members of the networks identified below, will also play a key role at various stages during the preparation of all policies, plans and planning applications.

Councillors

6.3 It is important that Councillors, as the democratically elected representatives of their Wards, have a clear role in the planning process. This is distinct from the role, which some Councillors will exercise as members of committees of the Council. Therefore, all Ward Councillors will be provided with regular updates to enable them to be kept informed, participate and engaged with their Wards at each stage of the planning process.

The Coventry Partnership

6.4 The Coventry Partnership is the local name for Coventry's Local Strategic Partnership (LSP). The Partnership is made up of representatives from Coventry's key public, private, community and voluntary organisations. They are all working together to deliver Coventry's Community Plan.

6.5 The Coventry Partnership is the main network the Council uses to interact with partner organisations and interested parties. Direct partnership working has already been established, with a planning officer sitting on each of the eight theme groups.

6.6 The Coventry Partnership prepares the Community Plan, which provides a context for the Local Development Framework. The Partnership has worked on planning issues at its theme group meetings and will continue to do so, as appropriate. The findings and priorities will be represented within the Local Development Framework documents.

6.7 It is anticipated that the Coventry Partnership Board and theme groups will provide input into decisions on the Core Strategy and other strategic issues, particularly how and when the Local Development Framework can deliver some of the objectives of the Community Plan.

6.8 This Statement of Community Involvement proposes to set up, with the agreement of the LSP, a sub-group of the LSP, following the model of its theme groups. This will be a balanced representation of the Coventry community.

6.9 The proposed sub-group will monitor the implementation of the Statement of Community Involvement and will feedback at least once every six months to identify possible improvements, innovations and initiatives to the Statement of Community Involvement process and techniques based upon local experience. Such a report will be submitted to the Council for consideration and disseminated to the responsible Cabinet Member.

Coventry Community Empowerment Network (C.E.N)

6.10 Coventry Community Empowerment Network (CEN) is a network of over 200 community groups. CEN enables groups to network, share information and skills, and provides opportunities for groups to come together throughout the year to engage with key decision-makers and take action on issues. Since it was set up in 2002, CEN has become the largest network of community groups in Coventry and its regular workshops are a key contact point for groups across the City. Coventry CEN plays a key role in the Coventry Partnership, facilitating community representation on the full Partnership Board and at Theme Group level, as well as wider engagement of the community sector through workshops and other mechanisms. CEN's success in bringing community voices into the Partnership has gained national recognition.

6.11 A Steering Group of community activists, elected by and accountable to its membership, manages the Coventry Community Empowerment Network. As a network of community and user-led groups, CEN does not have a legal entity but is supported by Coventry Voluntary Services Council, its Responsible Body. CEN does not always aim to speak as a single voice, but to bring a genuine community perspective to partnership working and decision-making. Its values are set down in its Terms of Reference:

“to be inclusive, to value the diversity of Coventry's communities, and aim to reach consensus in its decisions.” Membership is open to any Coventry community or user-led group or local network. A high proportion of its member groups represent priority neighbourhoods and marginalised communities, particularly black and minority ethnic, faith, disability and older people's groups.

6.12 As there are 2 Community Empowerment Network representatives and 1 City Council representative from the Planning Service on each of the 8 Theme Groups of The Coventry Partnership, there is already a strong foundation for meaningful and integrated joint working. A dedicated sub group within the Community Empowerment Network has been set up to assist in the successful delivery of the Statement of Community Involvement. A further group is assisting with the development of the Core Strategy.

6.13 As a recognised representative of communities of place and interest in the city, the CEN is a key reference point for discussion on the Statement of Community

Involvement and will be strongly represented on the proposed Statement of Community Involvement Review Group.

Forum for Constructing Excellence (FORCE)

6.14 Coventry FORCE is a body representing the construction sector in the Coventry area. It was formed following a period of consultation, in 2000. It is a networking forum for new business and a mechanism for sharing good practice. The forum can also be used to share concerns and can be aired and communicated to other parties. Above all, it is a 'one-stop-shop' for matters relating to the construction industry in Coventry and Warwickshire.

Statutory consultees

6.15 The Government requires the Council to consult certain organisations. These are listed in Table 1 of Appendix A. They are sent copies of Local Development Framework documents as a matter of course and are consulted at all stages. They are often involved in early discussions on particular issues and development sites where their work and provision of services and facilities may be affected.

General and other consultees

6.16 Table 2 of Appendix A lists other types of consultees who the City Council will consult on Local Development Framework documents where appropriate. Table 2 lists bodies, which represent the interests of voluntary, racial, ethnic, religious and disabled groups in the city and beyond.

Hard to engage groups

6.17 There is some disadvantage experienced by communities in Coventry, which has already been identified in the Coventry Community Plan. This Plan lists the following city-wide communities of interest:

- Students
- Disabled people
- Disaffected young people
- Ex-offenders
- Homeless people
- Looked after children (children and young people in the care of social services)
- Older people experiencing isolation and poverty
- People from the most disadvantaged black and minority ethnic groups
- People experiencing mental ill-health
- Refugees and asylum seekers
- Children and young people
- Women and children experiencing domestic violence

6.18 In addition there may be groups which are not disadvantaged but which are still hard to engage with, such as small businesses.

6.19 In order for the Statement of Community Involvement to realise its vision, it is vitally important for us to identify and understand the needs of the 'hard to engage' groups specifically related to planning matters in the city. The Council will have

regard to the requirements of the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act, 2005 in preparing Local Development Framework documents and consulting on planning applications. LDF documents and any related literature can be made available in a variety of formats e.g. Braille, large print, audio cassette, languages other than English. Documents in other formats can be obtained from:

Planning and Building Control

Civic Centre 4

Much Park Street

Coventry CV1 2PY.

Tel: (024) 7683 1219 Fax: (024) 7683 1259 Email: ldf@coventry.gov.uk

6.20 The Council has undertaken research to help further identify the 'hard to engage' groups in the Coventry context specific to planning matters.

6.21 This important piece of work aims to evidence the types of groups who may find it difficult to actively engage and get involved in the planning process.

6.22 The research is available to view on the Council's website: www.coventry.gov.uk/ldf. The findings are helping to further develop the techniques and methods for furthering the involvement of the identified 'hard to engage' groups. The approach to engage, consult and involve the 'hard to reach' groups in Coventry is set out in table 2.

Existing forums for involvement

Ward Forums

6.23 The Council had a network of Area Forums intended to facilitate effective involvement in local decision making. These have been reviewed following the reform and re-launch of the Council's Neighbourhood Action Service in order to make them more effective and open. Ward Forums may be a mechanism for front loading community engagement on policy development and major proposals.

Coventry by Design Forum

6.24 This was first set up in 1998 to feed into the Urban Design Study, which was published in 1999. It is a means of ongoing engagement with all who may have an interest in the design, development and physical regeneration of the city. It is also an opportunity to contribute to and influence the content and quality of urban design projects.

6.25 In order to accord with the principles of the Statement of Community Involvement the Coventry by Design Forum will adopt the following good practice:

- As far as possible papers will be circulated in advance of any meeting.
- The list of invitees to the Coventry by Design Forum will be integrated with the Single Consultee Database (see para 6.31).
- All attendees will be provided with feedback, which will enable them to track how their contribution has influenced decision making.

Development Forum

6.26 This is intended to enable the engagement of Councillors and members of the public in pre-application discussions in a structured manner, with a view to promoting quality development and facilitating engagement with communities at the earliest opportunity.

6.27 Developers are encouraged to undertake targeted consultation in the local area when formulating their proposals. They are then given the opportunity to make a presentation to all Members of the Council and any other interested parties. They should describe their proposal and explain how they believe the proposal relates to the Coventry Development Plan (CDP) 2001, how it fits in with local needs and preferences and any other matters that they consider support their proposal. A question and answer session on factual matters follows.

6.28 In order to accord with the principles of the Statement of Community Involvement the Development Forum will adopt the following good practice:

- Developers will include in their presentation how they have undertaken early engagement and to show the outcomes.
- Plans to be presented at the Forum will be available to be viewed at least seven days in advance and after the meeting.
- The list of invitees to the Development Forum will be integrated with the Single Consultee Database (see para 6.31).
- It will be made clear, after each presentation, to whom comments should be made (this will be the developer or his/her professional advisor).
- Developers will be encouraged to include in their submission a clear and detailed account of how comments received influenced their final proposal.

Residents Liaison Forum

6.29 The Residents Liaison Forum was set up in 2002 in order to continue to improve customer service and help groups to understand how the planning system works and to encourage engagement in it.

6.30 Meetings are held at least every three months. The purpose is to discuss general planning issues rather than site-specific matters and starts from the viewpoint that the more people know about and understand the planning system the easier it is for them to make a contribution to it. Discussions involve working practices, changes in legislation and discussion on specific planning issues (telecommunications, advertisement regulations). Specific actions that have arisen to date include the introduction of a late night opening of the planning reception with duty planning officers, changes to site notices to make them more visible and the introduction of special envelopes to highlight the importance of neighbour notification letters. This forum can also be used to explain the new Local Development Framework approach to policy review and ensure greater involvement.

6.31 In order to accord with the principles of the Statement of Community Involvement the Residents Liaison Forum and the list of invitees to the Development Forum will be integrated with the single consultee database.

Consultee and Access Point Databases

6.32 A single database will be maintained by all sections of the Council concerned with consultation on spatial planning. This will provide contact details for the organisations described in Appendix A. It will specify:

- what matters the organisation wishes to be consulted on.
- what forums they are invited to.
- whether they receive weekly planning lists.
- their preferred method of communication (to reduce costs electronic communication will be encouraged).

6.33 Any organisation will be able to check whether they are on the list, the accuracy of the details and what meetings (Coventry By Design, Development Forum, Residents Liaison Forum) they are invited to. They will be able to ask to be added to the list, amend their details, or request to be invited to a particular forum.

6.34 A single database of community access points will also be maintained. These include libraries, community centres, social clubs and places of worship and their associated facilities. As well as location, contact details, and access information, the database will specify whether each access point is suitable as:

- a venue for exhibitions, workshops and meetings.
- a place where plans could be kept for viewing by local residents.
- a place where support could be given to access planning information online.

Staff Awareness and Training

6.35 Throughout the preparation of the Statement of Community Involvement a programme of awareness raising has been undertaken amongst all relevant Council staff. This included staff in City Services and Development Directorate and staff of other relevant sections, which include Neighbourhood Action and Corporate Policy Unit. This programme of awareness raising will continue.

6.36 All Council employees are entitled to a minimum of three days training per year. The City Council is committed to enabling staff training on community involvement techniques.

Community Capacity Building

6.37 Greater and more satisfactory involvement in the planning process will be achieved if more of Coventry's citizens', particularly those in positions of leadership in their communities, are conversant with the planning system, consultation principles and techniques and built environment quality issues. The Council is committed to working with our community partners, particularly the Community Empowerment Network, to develop proposals and identify resources for community capacity building on planning, engagement and design.

Resources

6.38 The Planning Section in City Development Directorate will undertake a significant proportion of the engagement. Finances have been allocated to recognise this commitment.

6.39 Considerable resources are allocated to engagement through the Planning Advisory Desk and commitments towards officer attendance at evening meetings, ranging from informal gatherings in residents' front rooms to formal presentations at Area Forums.

6.40 Where landowners, developers or external organisations choose to carry out pre-application consultation exercises (as encouraged by this SCI) they will be responsible for the cost. The Council will assist and possibly take part itself in these exercises. There may be opportunities for using skills and experience in the community itself, though this may require some financial or in-kind support.

6.41 Planning resources are already used in a variety of ways for engaging with the broad Coventry community, including the Coventry By Design Forum, Residents' Liaison Forum, Development Forum and specific arrangements in key regeneration areas. Informal meetings and presentations to discuss specific schemes are held to provide assistance to individuals and groups on planning issues.

6.42 Joint working with other Council departments such as Coventry Direct and Neighbourhood Action enable additional resources to be levered in to community engagement activities. In addition, our partnership arrangements with community and voluntary sector organisations can unlock their volunteer resources to enable community engagement with planning matters and development proposals to be further enhanced in the City.

7.0 Consultation and Involvement in the Local Development Framework

7.1 This section details and develops further the specific consultation methods, techniques and delivery mechanisms in relation to Coventry's Local Development Plan, which can be viewed on the Council's website: www.coventry.gov.uk/ldf. The documents, which will be subject to the standards in this Statement of Community Involvement, are listed below:

- Core Strategy
- Topic Based Plans
- Area Action Plans
- Proposals Map
- Supplementary Planning Documents

7.2 The Council recognises that there is always scope to improve how it listens to and communicate with stakeholders and the wider community. The Statement of Community Involvement applies to all engagement, consultation and involvement for plans and planning applications are required to be prepared in accordance with it.

Our Pledge:

"We will continue to evaluate the methods that work and those that do not, in order to improve representation and the balance of involvement in the continued preparation of development plans for the City".

Who will be involved?

7.3 Government Regulations require the Council to meet a minimum level of public consultation and specify a number of organisations, which must be consulted if the Council considers that they will be affected (please refer to Table 1 in Appendix A).

7.4 Consistent with long established practice, the Council wishes to go further in proactively involving local communities. The Council recognises there are various ways in which views can be sought and whereby people can participate in the planning process.

Who will we engage with?

7.5 For all Local Development Framework documents we will be consulting and working with the following networks and forums:

- The Coventry Partnership
- The Community Empowerment Network
- Coventry By Design Forum
- Development Forum
- Forum for Constructing Excellence (FORCE)
- Residents Liaison Forum

7.6 It should be clearly recognised that in addition to the groups and organisations listed in Appendix A, all other partners that are included on our database will also be initially consulted as a matter of course for each Local Development Framework document. At present, this consists of over 350 groups, organisations and private individuals. This will be in addition to legal requirements to consult certain organisations such as government agencies and other organisations (see Table 1 in Appendix A).

How will the community and stakeholders be involved?

7.7 Many communities and stakeholders are already working with the Council on a wide range of issues and projects. These networks also have considerable expertise and experience of working on an extensive range of planning issues. Therefore, a strong basis of working in partnership already exists which can be used as a foundation for greater involvement in planning over time.

7.8 It is vital to make the best use of both the Council's, the communities' and stakeholders' time and resources by developing integrated and agreed approaches to working together. Figure 2 sets out our basic commitments for involvement throughout the plan preparation process.

7.9 The Council does not want to be prescriptive about the type of consultation tools and techniques that can be used in respect of each Development Plan Document. It would be wrong to promise something that could not be delivered as circumstances, needs and priorities can change over the course of the next 3 years during plan preparation. We will learn through further experience and no doubt develop new consultation tools and techniques. Any consultation or participation event will be tailored to the type of Local Development Framework document by drawing upon the list in Table 1.

7.10 We will work collectively and constructively with all partners and by using evidence from experience, to decide the most suitable approach. Table 1 sets a 'menu' of possible approaches that may be used to help achieve meaningful and continuous community involvement. It should be recognised that different methods of community involvement will be more or less appropriate depending on:

- The type of Local Development Document being prepared.
- The particular stage in the preparation process.

Our pledge:

"We will tailor our approach to community involvement on all Local Development Framework documents by agreeing appropriate methods during each stage of preparation"

How will plans be prepared?

7.11 Figure 2 shows the main stages involved when preparing a plan, which is informed through an evidenced based consideration known as a Sustainability Appraisal, which will also incorporate the requirements of the EU Strategic Environmental Assessment Directive.

7.12 Now that Statement of Community Involvement has been adopted, we will need to ensure that all documents and plans are prepared in accordance with its requirements. When we prepare each Development Plan Document for submission to the Secretary of State, the Regulations require that we also submit a Statement of Compliance. This will set out in detail how we have sought to meet our community involvement obligations outlined in the adopted Statement of Community Involvement.

7.13 The Inspector, when testing the soundness of the Development Plan Document at Examination, will use the Statement of Compliance to determine whether the Statement of Community Involvement has been correctly followed. If there has been a failure to comply with the Statement of Community Involvement or the Regulations, in a way that undermines the Development Plan Document, the Inspector can recommend that the plan be withdrawn. For a detailed breakdown of the role of each plan, please refer to the Council's CLDP work programme using the following website:

www.coventry.gov.uk/ldf

Supplementary Planning Documents (SPD)

7.14 The proactive engagement of communities through policy development can also be achieved through the preparation of Supplementary Planning Documents. These are produced to expand on policy and provide additional information and guidance in support of policies and proposals in Plans. They can be site specific or topic based. The process for preparing a Supplementary Planning Document is similar to that for a Plan, but simplified. Supplementary Planning Documents are not subject to independent examination. Figure 3 sets out the preparation process, which is informed by community involvement and a full Sustainability Appraisal. Details of the Supplementary Planning Documents the Council intends to prepare are set out in the approved Local Development Scheme (LDS).

7.15 The Council is committed to making communities aware of the potential of Supplementary Planning Documents (SPD) as proactive planning tools. SPD cannot be used to introduce new development proposals or allocations, but they can show how the proposals contained in Development Plan Documents will be articulated and related on the ground.

How will the Council publicise the plans and documents?

7.16 Methods will include the following: (further details of some of these are referred to in Appendix B).

- Area Forums
- The Council's website and electronic means of communication
- Local libraries and other community facilities
- Local newspapers and other media
- Parish Council meetings
- Statutory notices
- The City Council offices
- The Council's Magazine 'Citivision'

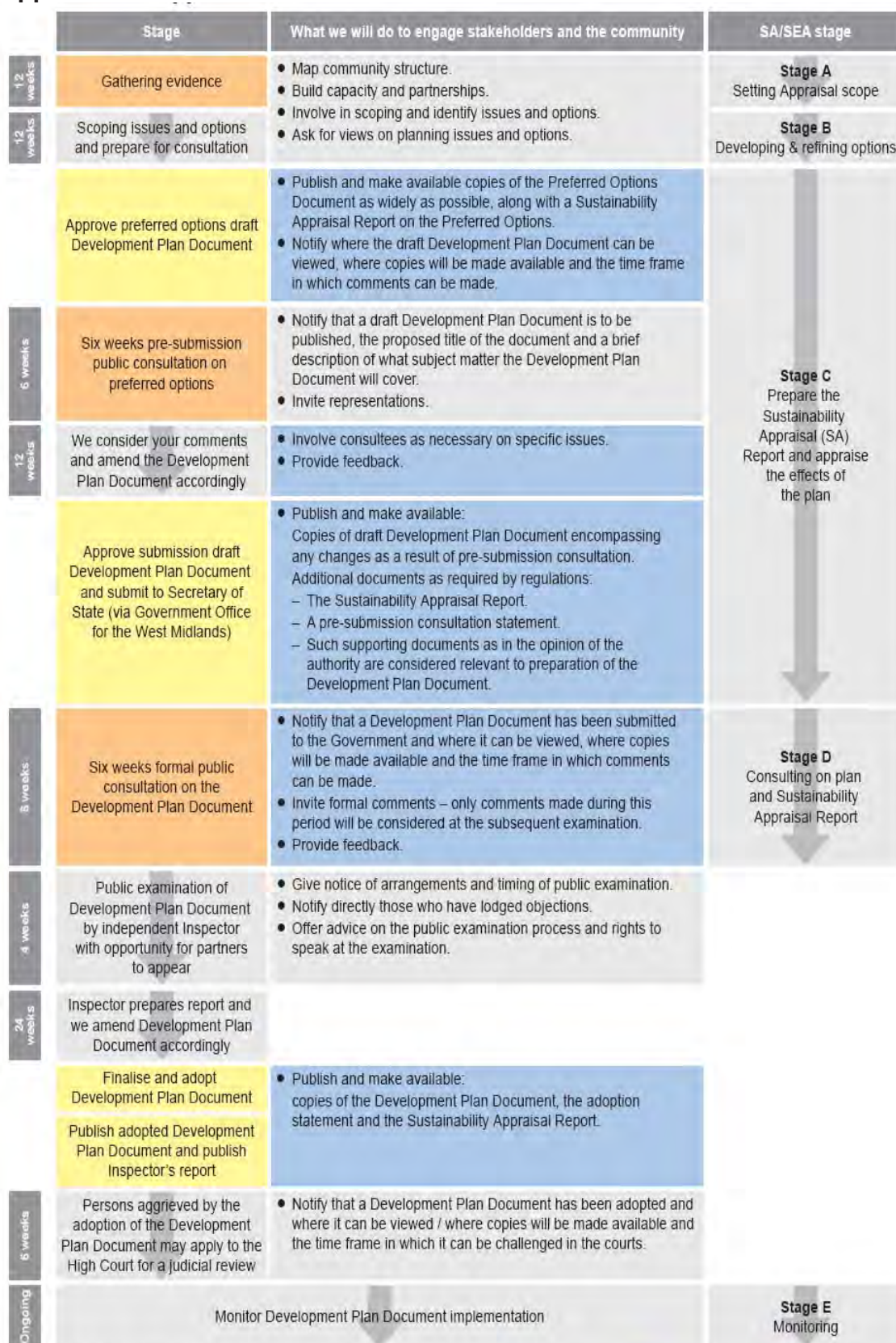
How will feedback work?

7.17 It is essential at each stage that there is a clear statement as to what has been done, what issues have arisen and how these have been considered and influenced the decision making process up to that point. This must then be communicated to those who have been involved. It will not usually be possible for everybody's views to be taken on board fully, but all participants must be sure that their voices have been heard and opinions actively considered.

7.18 Feedback will take place after any consultation exercise and within an agreed timescale. During each public consultation exercise, a schedule of representations will be prepared, which will record written comments and the impact they had on the final document. This will be available for inspection on the website and at the Planning Advisory Desk.

7.19 Committee reports will identify issues arising and those persons who have made representations will be advised of the date of any formal consideration will, subject to a protocol, be permitted to speak at any formal decision making forum. Once a decision has been made, any person who made representations will be advised in writing of the outcome. The Council's magazine "Citivision" will continue to be used to give feedback and communicate information, including the results/outcomes of consultation and participation events and news to the wider community.

Figure 2: Development Plan Document Preparation Process and our Approach to Involvement



An additional period of six weeks consultation is allowed after submission but before the examination in the event of site allocation representations being made.

 Process
  Feedback
  Outcome
  Consultation

Figure 3: Supplementary Planning Document Preparation Process and Our Approach to Involvement

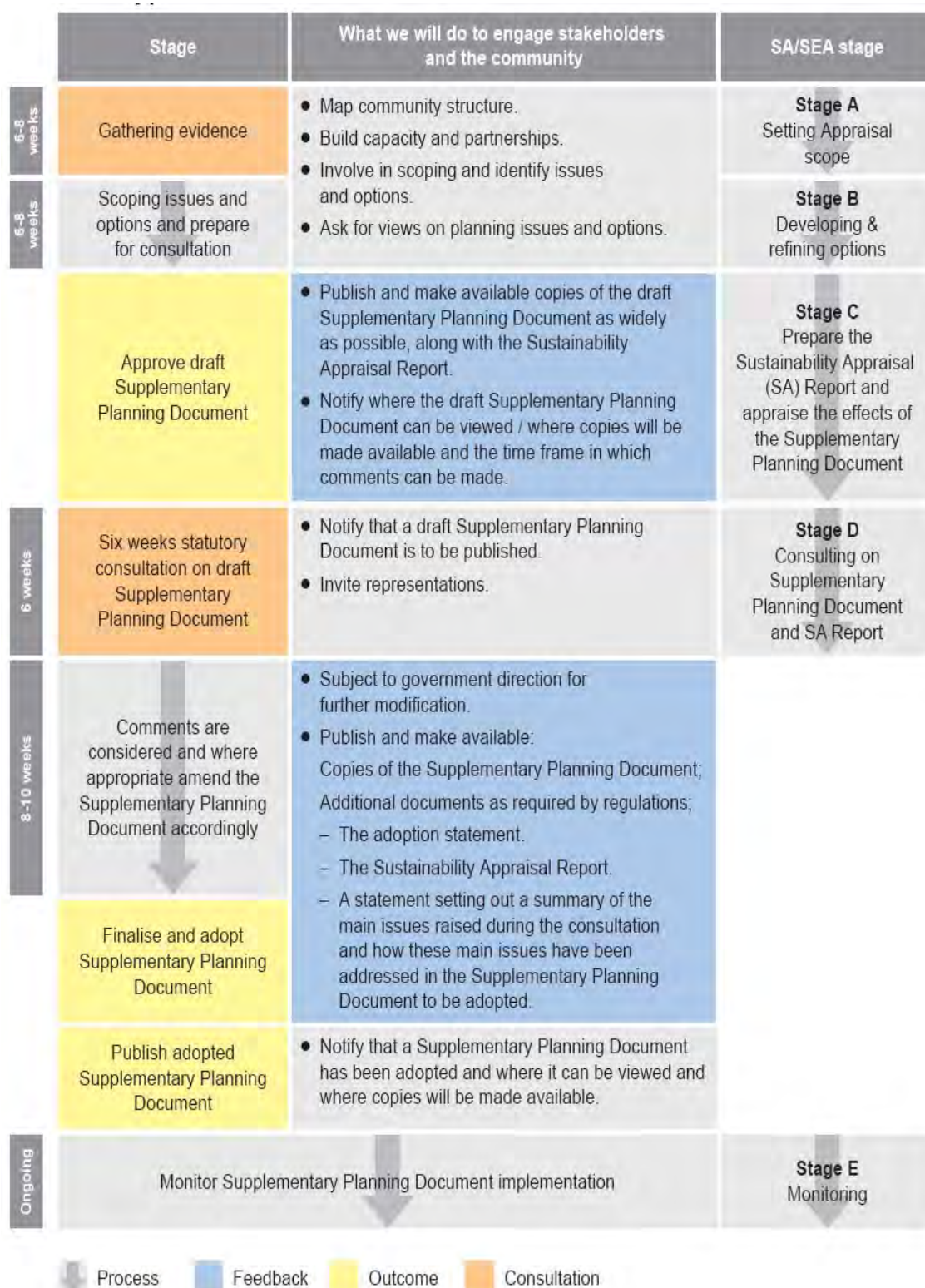


Table 1: Community Involvement Methods and Techniques

Method/Technique	Stage Appropriate			Description	Evidence Base
	Issues & Options	Preferred Options	Submission		
Exhibitions/roadshows/ open days	✓	✓		Effective means of providing information to the wider community and inviting views in an informal way.	6% of SCI questionnaire respondents considered this to be a useful means of involvement.
Questionnaires/surveys	✓	✓		Can enable detailed and focused consultation around a series of worded questions.	
Letter, email and website	✓	✓	✓	All consultation documents will be published on the Council's website. Responses can be submitted via downloading documents.	38% of SCI questionnaire respondents considered email to be a useful method of communication but 62% still preferred written letter.
Media and publicity	✓	✓	✓	Local newspapers will be used to advertise publication of plans/documents and meetings. Use will also be made through the Council's own magazine 'Citivision'. Radio and television may also be willing to assist. Statutory Notices will be used to invite comments during the preparation of plans.	9% of SCI questionnaire respondents considered 'Citivision' to be a useful means of informing.
Planning workshops	✓	✓		Discussion based event to present and gather information usually focused around a series of topics or issues.	12% of SCI questionnaire respondents considered community workshops to be a useful means of involvement.
Master Planning and Planning for Real	✓	✓		Covers issues such as potential layout, design and incorporates the communities' requirements. Useful techniques in master planning an area can include 'Enquiry By Design' and 'Planning for Real'.	Proven successes through working examples in the city, which include the Swanswell Initiative and Stoke Aldermoor Regeneration projects.
Steering groups, networks and forums	✓	✓	✓	Mechanism for focusing and engaging in the production of all plans and documents.	A LDF Corporate Working Group has been established with officers from each Directorate of the Council. Other LDF Task and Finish Groups have been set up with CEN and The Coventry Partnership.
Visioning events and stakeholder meetings	✓	✓		Individual meetings with partners and stakeholders. Can obtain in-depth comments regarding documents and/or plans and useful in understanding and addressing outstanding issues.	Successful meetings held with key stakeholders during preparation of the SCI.

Table 2: How we will involve you in our plans

Stage	Groups	Consultation Techniques
Issues and options	All Groups on LDF database All other groups All residents	Press Releases, advertisements in newspapers. Making documents available on website, at libraries and Council offices. Use of email wherever possible rather than post. Documents can be made available in other formats and languages on request. Exhibitions in Community Areas based on demand.
	Residents Associations	Invitation to attend exhibition
	Businesses	Briefings and short focus groups on specific issues such as transport, economic development, sustainable communities, environment Use of Business forum meetings.
	Local Environmental/Other Interest Groups	Focus group on above issues
	Coventry Partnership	
	All residents	Open Evenings / exhibitions / Ward Forums.
	Older people	Information at residential homes for older people, Post Office, Doctors Surgeries
	Young people	Publicity information sent to schools, with invitation to be involved in process
	Black and Minority Ethnic Groups	Peer Consultation Discussion groups with established BME groups and forums
	Disabled Groups	Presentation on request
Lesbian, Gay, Bisexual and Transgender Groups	Discussion forums / focus groups using links through existing equality and diversity forum	
Submission Draft	All Groups on LDF database All other groups All residents	Press Releases, advertisements in newspapers. Making documents available on website, at libraries and Council offices. Use of email wherever possible rather than post. Documents can be made available in other formats and languages on request. Exhibitions in Community Areas based on demand.
	Residents Associations	Invitation to attend exhibition
	Business	Breakfast briefings with exhibitions of proposals – or use of Business forum meetings
	Local Environmental/Other Interest Groups	As with all groups

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	Coventry Partnership	Presentations on request, Circulation of materials
	All residents	Open Evenings / exhibitions / Ward Forums.
	Older people	Information at residential homes for older people, Post Office, Doctors Surgeries
	Young people	Discussions with Schools and Coventry Youth Council and Young Peoples Parliament
	Black and Minority Ethnic Groups	Peer Consultation Discussion groups with established BME groups and forums
	Disabled Groups	Presentation on request
	Lesbian, Gay, Bisexual and Transgender Groups	Presentation on request

8.0 Community Involvement In Planning Applications

8.1 This section clearly sets out our practice for community engagement and involvement for all planning applications.

8.2 Almost every planning proposal has an impact on somebody. There are, however, proposals, which will generate more community interest and involvement than others, particularly those that are likely to be 'controversial'. These are mainly:

- Large scale applications (more than 10 dwellings, 1,000 square metres of floor space or a site of more than 0.5 hectares).
- Applications that are not in line with policies contained in the Development Plan/Local Development Documents.
- Proposed developments where there would be significant environmental impact and/or significant transport implications.
- Other applications where community involvement may be important. For example, where employment land or green space may be lost.
- Proposals where there is a potential impact on adjoining Conservation Areas or listed buildings.
- Those applications that generate local concerns, e.g. food and drink uses.

8.3 For the purpose of this Statement of Community Involvement, the description of proposals above will be considered as significant applications. Good practice in carrying out consultation for major planning applications can be found at the following website: www.planningportal.gov.uk/planning/applications/

Pre-application Consultation

8.4 Pre-application consultation is actively encouraged in all cases at the earliest possible opportunity. Community consultation works best if it is carried out at the point when proposals are being formulated. By 'front loading' the process, the community is able to participate in identifying issues and debating options from the onset, thus having the potential to make a real difference to the design of the proposal subsequently submitted.

8.5 Potential applicants will be encouraged and supported to undertake pre-application consultation through the following measures:

- The benefits of pre-application consultation will be strongly featured on the website and in advice literature
- Developers and other applicants approaching the Council at an early stage will be encouraged to undertake early consultation. Officers will point out that the benefits of early consultation nearly always outweigh any benefits of confidentiality.
- Advice and information will be given on how to carry out community consultation, including advice on techniques, lists of community organisations and venues, contact details of city-wide organisations who could help and lists of experienced consultants.
- Developers will be allowed to lodge drawings with the Planning Advice Desk and

to have them placed on the website, and to have their proposals publicised and provide their contact details.

- In considering planning applications, the requirements of the SCI will be followed.

Information on the Planning Process

8.6 Information on the planning process, how to make applications and representation on applications is made available through leaflets, the Planning Advisory Desk in Civic Centre 4 and through the Council's website:

www.coventry.gov.uk

Information on Planning Applications

8.7 Information on planning applications is made available through the following measures:

- All properties that adjoin the boundaries of an application site are sent a letter notifying them of receipt of any application and giving them opportunity to view the proposals and make any representations. At the discretion of the case officer, the dispatch of notification letters can be widened and a site notice may also be displayed in the immediate vicinity of the application site.
- Case Officers may decide to display site notices in a local area advising of specific proposals.
- All local residents and interest groups are provided with a weekly list of applications received so that they may consider whether they wish to submit a representation either for or against proposals.
- As required by regulations, certain major planning applications and those affecting a Conservation Area or the setting of a listed building, are advertised in the local newspaper (Coventry Evening Telegraph) and site notices are also displayed.
- Weekly lists of all applications made and received by the Council are circulated to the local newspaper (the Coventry Evening Telegraph).
- Copies of the weekly lists are also sent to Councillors, Parish Councils and other groups who request them via the Bulletin.
- The weekly list is also available on our website at:

<http://planning.coventry.gov.uk/portal/servlets/WeeklyListServlet>

8.8 Plans, drawings and other application documents are available for the public to view at the Council's offices at Civic Centre 4 during regular office hours. A late night opening is provided once a week. Proposals can also be inspected and commented upon through the Council's web site.

<http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet>

8.9 Whilst the statutory requirement is that only certain types of development should receive full publicity, the Council wishes to ensure that maximum publicity is given to all proposals. Table 2 details our basic commitments. Appendix D provides a greater level of detail as to the other methods of information and consultation that could be deployed, where appropriate in addition to our basic commitments.

8.10 In considering the application of any conditions to planning approvals, including section 106 agreements, the Council will consider any published neighbourhood plans and liaise with the appropriate Area Forums to ascertain whether any pre-

existing objectives can be met within the scope of planning law. Proposals for section 106 agreements shall be published before any planning application is determined and organisations representing local residents and other interest groups will be consulted.

Representations on Planning Applications

8.11 The normal period for representations on planning applications, once registered, is 21 days. (However, bodies such as English Nature will be allowed a longer period of time to comment on applications where this is prescribed by legislation). Bearing in mind the requirements as regards determination of applications within specified periods, every opportunity will be taken to encourage pre-application consideration. For more significant planning applications identified in 8.2, a period of time will be allowed for comment.

8.12 Representations are required to be made in writing by letter, fax, email or via the website. The Council is committed to e-government and all representations received will be placed on the website usually within five working days.

8.13 All respondents should also be told when there is a significant change to the application and given the opportunity to comment further if necessary, that may address their initial representation. The Council is presently trialling a scheme whereby all respondents will be notified when the application is going to committee. The present Public Speaking provisions (see Appendix C) will continue to be operated and periodically reviewed.

Feedback

8.14 All respondents will be informed of the decisions in respect of planning applications and the reasons if the application has been refused and any conditions imposed on any grant of permission. Reports to Planning Committee will continue to summarise those comments received and the issues will be addressed.

Determining Planning Applications

8.15 Once a proposal is formally submitted there are prescribed time limits within which it is expected that a decision will be made. There are two elements to this:

- Eight weeks for all planning applications
- Thirteen weeks for major planning applications

Our pledge:

“The Council is committed to the principles of consultation with the community on planning applications and will continue to go significantly further than the legal requirements to fully involve the community in all appropriate circumstances but will also expect to meet the Government’s guidelines in respect of the speed of decision making.”

Table 3: Methods of Community Involvement, Consultation and Publicity

Stages of Application	Methods of Publicity, Consultation and Involvement									
	Weekly List	Web Site	Neighbour Notification*	Site Notice	Statutory Newspaper Advert	Exhibition of Plans	Press Release	Public Meetings	Development Forum	Planning Advisory Desk and Liaison Officer
All Planning Applications										
Pre-application (we recommend)										
Application	✓	✓	✓							✓
Post application		✓	✓							✓
Appeal		✓	✓	✓	✓					✓
Significant Planning Applications										
Pre-application (recommended methods to be undertaken by prospective developers / applicants)		✓		✓		✓	✓		✓	✓
Application	✓	✓	✓		✓			✓		✓
Post Application		✓	✓							✓
Appeal		✓	✓	✓	✓		✓			✓

* To notify neighbouring properties immediately adjoining the application site.

Consultation requirements related to the Planning Act 2008 and National Policy Statements

8.16 The 2008 Planning Act outlines consultation requirements for nationally significant infrastructure developments. In preparing planning applications, it should be noted that the following requirements must be addressed:

- an applicant must engage in pre-application consultation with local communities, local authorities and those who would be directly affected by the proposals.

- The applicant must draw up a Statement of Community Consultation which describes how he proposes to consult the community and submit it to the local authority for their comments. Once the applicant has finalised the statement it must be published in a local newspaper and the consultation must then take place.
- The applicant must also consult the relevant statutory consultees and technical consultees as set out in the regulations.
- Following the consultation process the applicant must prepare a consultation report explaining what consultation was undertaken, summarise what responses were received and what was done in response including any changes made to the project and submit the report to the Infrastructure Planning Committee.

8.17 Planning Performance Agreements (PPAs) were formally introduced into the planning system on 6 April 2008 and are about improving the quality of planning applications and the decision making process through collaboration. They bring together the Local Planning Authority (LPA), developer and key stakeholders, preferably at an early stage, to work together in partnership throughout the planning process. They are essentially a collaborative project management process and tool that provide greater certainty and transparency to the development of scheme proposals, the planning application assessment and decision making. For additional support, please use the following website:

www.atlasplanning.com/page/ppa.cfm

Pre-application consultation with the Council

8.18 Pre-application discussions with developers for major applications with the City Council is recommended. A successful example of this approach can be shown in the Coventry Belgrade Plaza scheme which required early discussions with the developer to identify all relevant planning issues before a formal planning application was submitted. These early discussions helped the scheme progress smoothly during the formal planning application process and resulted in a mutually beneficial outcome, both in terms of the time period for determination and resources allocated for obtaining approval.

8.19 The intention of the City Council is to provide more vigorous early consultation requirements (frontloading), in relation to major planning applications so that the opportunity for stakeholders to influence proposals will be maximised and in turn ensure they are in the wider public interest.

What is a major application?

- the creation of at least 10 residential units; or residential development on a site of 0.5 hectares or more;
- non-residential development on a site of 1 hectare or more;

- the creation or change of use of 1000 square metres or more of gross floor space (does not include housing).

8.20 The Council has set out the following tiered approach to provide guidance to applicants on which major applications may be subject to wider community involvement, with the level of engagement expected to be appropriate to the scale and nature of the proposal.

8.21 Therefore, for very large or controversial applications, as described in Tier Level 1 below, the Council will encourage developers to carry out an extensive consultation exercise with the public. A more limited pre-submission consultation is suggested for applications that fall in Tier level 2, as these are likely to be smaller proposals, but may be locally contentious.

Tier Level 1

- Major Development Plan Departures – major applications proposing significant departure from the Coventry Development Plan 2001;
- Developments requiring Environmental Impact Assessment which are accompanied by an Environmental Statement;
- Proposals subject to Direction by the Secretary of State Applications that require a Full Transport Assessment to reflect the scale of development and the extent of transport implications of the proposal;

Tier Level 2

- Proposals that are likely to be locally contentious or generate significant local concern following the submission of an application;
- Applications that fall within sites that are sensitive to development pressures, including Conservation areas, listed buildings.

8.22 It is important to recognise that the level of consultation for each individual proposal will be deemed appropriate through discussions carried out with the Council and the applicants, and may not always follow the tiered approach set out for guidance above. The responsibility for pre-submission consultation will remain with the applicants and their agents. Although the Council will ensure that appropriate consultation takes place our role will be on the form of consultation expected, this advice will be without prejudice to the outcome of the proposal.

Table 4 Possible consultation techniques on major planning applications

Consultation approach	Tier Level 1	Tier Level 2
Public meetings - on larger and more controversial schemes, a wider audience can debate and discuss proposals	✓	
Public exhibition - on larger schemes, exhibitions held locally to the proposal can provide information and raise interest	✓	✓
Development Briefs - on larger schemes. Development Briefs prepared by the applicant and subject to consultation provide an opportunity to involve the public at an early stage in the principles of a proposal	✓	
Workshops - on larger schemes, allows stakeholders and community groups to discuss in detail particular issues at an early stage of a development proposal	✓	
Enquiry by Design - Intensive workshop exercise with stakeholders appropriate for very large sites with a complex series of issues that need subtle testing and examination to achieve the optimum design solution.	✓	
Planning for Real - uses simple models as a focus for people to put forward and prioritise ideas on how their area can be improved.	✓	✓
Parish Councils - important way of raising interest locally and provides access to a network of local community groups.	✓	✓
Media - Radio and local press can enable a wide audience to be reached. Documents and processes can be explained in simple, appropriate language	✓	✓
Website - all relevant documents can be provided online through dedicated web pages facilitated through the Council or applicant, keeping residents informed of consultation events	✓	✓

9.0 Review of the Statement of Community Involvement

9.1 There will be a full evaluation and review of the Statement of Community Involvement 18 months after adoption to assess whether the methods and techniques are proving successful. This will be evidenced through the findings of the Annual Monitoring Report and through the partnership working arrangements of the proposed Statement of Community Involvement Review Group under the auspices of the Coventry Partnership.

9.2 There are some sections in the Statement of Community Involvement which will require particular monitoring, especially those areas where work to establish new groups or getting target groups involved in the planning process has only just started.

9.3 To ensure effectiveness we will focus on the following key questions:

- How have the views of the community and other stakeholders' influenced documents and the planning of developments.
- How well have we involved those who are sometimes excluded from the planning process.
- How satisfied have partners been with the processes used even if they oppose the final decisions.

Appendix A: Stakeholders and Partners

The organisations that the regulations require the Council to consult are set out in Table 1 below, they will be consulted throughout the preparation of the Local Development Framework Documents. The Council is only required to consult those organisations marked with an asterisk in respect of the Statement of Community Involvement, but has gone beyond the statutory requirements in progressing to this adopted version. Please note, the list of bodies in this Appendix is not exhaustive and also relates to successor bodies where re-organisations occur.

Table 1: Specific Consultees

Adjoining Local Authorities including Parish Councils*
Advantage West Midlands (RDA)
Countryside Agency
The Coventry Partnership (LSP)
Electricity and Gas Companies
English Heritage
English Nature
Environment Agency
Government Office for the West Midlands (GOWM)
Highways Agency*
Historic Buildings and Monuments Commission for England
Severn Trent Water Ltd
Strategic Health Authority
Strategic Rail Authority
Telecommunications companies
West Midlands Regional Assembly (Regional Planning Body)*

Homes and Community Agency

Single Consultee Database

There are many other groups and organisations which are set out in Table 2. This sets out a list of 'standard' national, regional and local consultees for Coventry Local Development Plan purposes. It is by no means exhaustive and it does not include a

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'long list' of the types of groups the Council proposes to consult as this could change too quickly.

The full list of consultees is held and controlled through a database, which is updated on a regular basis by the Council. Any group, organisation or individual who wants to get involved can request their details be added to or taken off the database, or amended by contacting City Services and Development Directorate on telephone (024) 7683 1219 or by email: ldf@coventry.gov.uk

This database will also be used for notifications of planning applications.

Table 2: National, Regional and Local Groups, Departments, Bodies and Organisations

Age Concern	English Partnerships	National Farmers Union
Allesley and Coundon Wedge Conservation Society	Equal Opportunities Commission	National Playing Fields Association
Arts Council West Midlands	Forestry Commission	National Trust
British Geological Survey	Friends of the Earth (Coventry)	Network Rail
British Horse Society	Government Office for the West Midlands (GOWM)	Older Peoples Information Network
British Transport Police	Groundwork, Coventry and Warwickshire	Police architectural liaison officers/ crime prevention design advisors
British Waterways, canal owners and navigation authorities	Gypsy Council	Ramblers Association
Centro	Health and Safety Executive	Royal British Legion, Coventry Branch
Civil Aviation Authority	Help the Aged	RSPB
Commission for Architecture and the Built Environment (CABE)	HM Prison Service	Schools Council
Commission for Racial Equality	Home Builders Federation (HBF)	Severn Trent Water Ltd
Country Landowners Association (CLA)	Housing Corporation	Sport England West Midlands
Countryside Agency	Learning and Skills Council	Telecommunications Companies
Coventry Airport Operators (Air Atlantique and Thompson Fly)	Local Amenity Groups	The Chamber
Coventry Council for Disabled	Local Business Groups	Tourism West Midlands
Coventry Health Authority (Primary Care)	Local Community Action Groups	University of Warwick
Coventry Partnership	Local Community Transport Groups	Warwickshire Wildlife Trust
Coventry Society	Local Leisure and Sports Group	Warwickshire, Solihull and Coventry Local Access Forum
Coventry University	Local Registered Social Landlords (RSLs)	West Midlands Fire Service
Coventry Way Association	Local Religious and Faith Groups	West Midlands Planning Aid Service
Coventry Youth Council	Local Residents Associations	West Midlands Police
CPRE (West Midlands Region)	Midlands Architecture and the Designed Environment (MADE)	West Midlands Travel
Culture West Midlands	Museums, Libraries and Archives West Midlands	West Midlands Water Board
Department of the Environment, Food and Rural Affairs (DEFRA)	Ministry of Defence	Whitefriars Housing Group
English Heritage	National Care Standards Commission	

Appendix B: Further Information and Publicity

Local Libraries

All community libraries in Coventry are listed below and have a range of computer terminals all with Internet access.

- Aldermoor Farm Community Library
- Arena Park Library
- Bell Green Library and Learning Centre
- Canley Community Library
- Central Library
- Cheylesmore Community Library
- Coundon Community Library
- Earlsdon Community Library
- Finham Community Library
- Foleshill Community Library
- Hillfields Community Library
- Jubilee Crescent Community Library
- Stoke Community Library
- Tile Hill Community Library
- Whoberley Community Library
- Willenhall Community Library
- Wyken Community Library

Coventry City Council Website

The Council's website is one of the primary methods of providing information and updates throughout the process. It will include an e-mail facility for asking questions about the various Local Development Framework documents and plans. The main advantage is that it allows information to be accessed at any time, and is not limited to normal office hours. The website can be accessed at:

www.coventry.gov.uk/ldf

More detailed information relating to our planning pages can be accessed at:

www.coventry.gov.uk/info/200074/planning

Local Newspapers and Other Media

The Council will, in accordance with the Regulations, advertise in at least one local newspaper. Details will include when and where plans and documents can be inspected, how copies can be obtained, the closing date for representations and where to send them. Press releases will also be issued to local newspapers and other media. The Council will also inform the community through regular notices and articles in the local newspaper Coventry Evening Telegraph and the Council's magazine Citivision which is sent to every household in the city.

Appendix C: Code of Practice for Public Speaking at Planning Committee

Part 5.5 – Code of Good Planning Practice for Members and Employees Dealing with Planning Matters

Coventry City Council Constitution

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A Guide to Public Speaking at the Planning Committee

1. Introduction

The Council operates a scheme for public speaking at its Planning Committee. You have registered as wishing to speak on a planning application to be decided by the Committee. That application is now ready to be considered by the Committee and this leaflet explains how you can take part before the Committee makes a decision.

2. The date, time and place of the Committee meeting

With this leaflet is a letter, which gives the date, time and place for the Planning Committee's meeting. Also there should be a copy of the written report on the application which will be before the Committee.

3. Do I have to speak?

No. Even though you've registered to speak this doesn't mean that you have to if you've changed your mind. If the application details have changed or the written report adequately summarises your views then you can choose not to speak. If you no longer want to speak, please telephone the direct line number on the enclosed letter to confirm this. Please have the letter to hand as we may need some details from it when you call. If you know that others have registered to speak and they share your views, you may want to choose one of your number to speak for you all. You can request that an Elected Member speaks on your behalf. You can find out who your local Elected Members are by phoning the Council on (024) 7683 3156. If you still want to speak this is what will happen at the meeting.

4. What will happen at Planning Committee?

- When the application is called, the Planning Officer will present the written report and refer to plans and photographs, which will be on display.
- Objectors to the application will then be called to speak.
- Supporters of the application will then be called to speak.
- The applicant (or their representative) will be called to speak.
- Members of the Committee will then consider the application and then vote.
- Officers may need to answer questions, respond and clarify points raised and advise the Committee on procedure.

5. Rules you should know about

All objectors, supporters and applicants (or their representative) who choose to speak will be bound by the following rules:

- You may only speak once and for a maximum of up to 3 minutes only. Please make all your points in the one 'go' - you won't be allowed a second chance. Where more than one objector has spoken, the applicant or their representative may, at the Chair's discretion, be allowed longer than 3 minutes to speak to respond to the points raised by objectors.
- Objectors, supporters and applicant (or their representative) will always speak in that order. Second and subsequent speakers will be expected to raise new issues.
- The Chair of the Committee will rule on any dispute as to the procedure to be followed and the ruling will be final. The Chair has the right to intervene and curtail public speaking to ensure orderly conduct and avoid repetition.
- You may only speak on 'planning matters'.

Planning matters include:

- Compliance with the development plan
- Design and use of the proposal in its surroundings
- The effect of sunlight and daylight on adjoining properties
- Loss of privacy to adjoining properties
- Effect on parking, traffic and road safety
- Noise and general disturbance to adjoining properties

Planning matters do not include:

- Spoiling your view
- Rights to light
- Devaluing your property
- Covenants affecting properties
- Nuisance caused by building work
- Land ownership disputes
- Personal character of the applicant
- Moral issues

Appendix D: Consultation Methods for Planning Applications

Table 3: Methods & Resource Implications

Method	Benefits	Resource Implications	Stage Appropriate	How Applied?
Information				
Public notices on sites	<ul style="list-style-type: none"> In theory can reach a wide audience. Is most likely to be seen by regular users so targets the groups most likely affected by proposals. 	<ul style="list-style-type: none"> Cost of each notice is minimal. 	<ul style="list-style-type: none"> Application stage. 	<ul style="list-style-type: none"> Notices are often used in conjunction with press advertisement or neighbour notification.
Newspaper notices	<ul style="list-style-type: none"> Can inform large numbers of people relatively easily. Generates public debate. 	<ul style="list-style-type: none"> Cost of advert is expensive. 	<ul style="list-style-type: none"> Application stage 	<ul style="list-style-type: none"> Public Notices relating to applications appear in the local weekly press.
Press releases	<ul style="list-style-type: none"> Can provide wide publicity of proposals. 	<ul style="list-style-type: none"> Minimal costs, if any. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> Statement issued to the media to seek to engage the wider public.
TV and radio interviews	<ul style="list-style-type: none"> The opportunities offered by such technology can make participation easier. 	<ul style="list-style-type: none"> Minimal costs, if any. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> Can be used to inform the community of key issues and consultations and to obtain views/comments or to inform of decisions. Tends to be the more controversial proposals that attract media attention.
Citivision (Council quarterly magazine)	<ul style="list-style-type: none"> Reaches all households and the Council has editorial control. 	<ul style="list-style-type: none"> Minimal if part of the existing publishing schedule. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> The timescales are such that rarely opportunity to use as part of application process.
Displays at libraries, planning advisory desk/ Council offices	<ul style="list-style-type: none"> Gives flexible terms of attendance so can be inclusive. Provides useful information, can inform debate and can be left un-staffed. 	<ul style="list-style-type: none"> Minimal if application documentation and development plan policy made available. 	<ul style="list-style-type: none"> Pre-application, application and post application stage. 	<ul style="list-style-type: none"> Provides more local venue for information either in paper copy or via web and where hours of opening generally greater than at civic offices.

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Method	Benefits	Resource Implications	Stage Appropriate	How Applied?
Consultation				
Public Meetings and Exhibitions	<ul style="list-style-type: none"> • Pre-consultation taking place in a genuine manner. • Process undertaken either independently from the developer or jointly. • Early opportunity for the community to comment on evolving proposals prior to submission. 	<ul style="list-style-type: none"> • Can be a resource issue depending on the number and duration of meetings/ exhibitions. 	<ul style="list-style-type: none"> • Pre-application, application and post application. 	<ul style="list-style-type: none"> • In most cases, a public meeting or exhibition will be encouraged on major proposals prior to consideration by the Development Forum. • Meetings may be arranged following formal submission of an application where requested by local community or Elected Members.
Parish Council meetings	<ul style="list-style-type: none"> • Continuity of representation at grass roots level. • Cost effective and accountable to local electors. 	<ul style="list-style-type: none"> • Officers attend meetings when requested. 	<ul style="list-style-type: none"> • Pre-application and application stage. 	<ul style="list-style-type: none"> • In most cases, a City Council Officer presence at a Parish Council meeting will be required on the advice of the local community, elected Members and/or local planning authority.
Website	<ul style="list-style-type: none"> • Greater level of access and involvement for all members of the community. • People can choose to engage at their leisure and in the comfort of their surroundings. 	<ul style="list-style-type: none"> • Considerable resources have been allocated to maximise benefits of the website as a means of communication. 	<ul style="list-style-type: none"> • Pre-application, application and post application stage. 	<ul style="list-style-type: none"> • The development and use of the Council's website in engaging the local community can be used throughout the process to help communication, participation and provide information.
Open days/road shows	<ul style="list-style-type: none"> • Gives flexible terms of attendance so can be inclusive. • Forum to listen as well as to inform. • Promotes good relations as direct contact with the public and decision makers. • Good way of reaching large numbers if well located. 	<ul style="list-style-type: none"> • Developer expected to fund. Officers in attendance as requested. 	<ul style="list-style-type: none"> • Pre-application stage. 	<ul style="list-style-type: none"> • One or more exhibition or display held in accessible locations where audiences can be informed of a development proposal. The aim is to take the information to the community using a range of media.

Appendix E: Glossary of Terms

Area Action Plans

These plans focus on areas that are subject to significant change and will benefit from having development plan status. They will be subject to Independent testing.

Annual Monitoring Report

A report, which assesses the implementation of the Local Development Scheme and the extent to which the policies are being achieved.

Core Strategy

The document, which will set out the vision, objectives and spatial planning strategy for the City.

Development Plan Document

One of a number of documents which is part of the development plan for the City and which are subject to independent testing.

Local Development Scheme

A programme of what is to be produced, the timescales and arrangements for production.

Local Development Framework

The portfolio of Local Development Documents, which constitute the spatial planning policies for the city.

Local Development Document

One of a number of documents which make up the Local Development Framework, including Development Plan Documents and Supplementary Planning Documents.

Statement of Community Involvement

A document, which sets out how stakeholders and communities will be involved in the process of producing Local Development Documents and planning applications. The Statement of Community Involvement will be subject to independent testing.

Supplementary Planning Document

A document, which elaborates on policies in Development Plan Documents and does not have development plan status. It requires community involvement in line with the Statement of Community Involvement or minimum regulations.

Sustainability Appraisal and Strategic Environmental Assessment

A document, which assesses the environmental social, and economic effects of the policies and proposals contained in Development Plan Documents and Supplementary Planning Documents.

If you need this information in another format or language
please contact us

Telephone: (024) 7683 1187

Fax: (024) 7683 1259

e-mail: ldf@coventry.gov.uk



Consultation on the Coventry Council Statement of Community Involvement

submitted by
Merle Gering
and the Keresley and Ash Green Society, KERAGS,
87 Somers Rd
Coventry CV7 8LS.

I am writing to respond to the consultation on the revised Coventry Council Statement of Community Involvement. (the SCI).

1. This document contains many fine sentiments, but virtually no guarantees or assurances that the public will be effectively informed of planning proposals at an early stage, nor that the public will have an adequate opportunity to challenge proposals. It is painful to read the document because it contains all the right notions but in practice it has proved entirely vacuous. **We need a Bill of Rights in Planning** which actually ensures that the public has the information it needs and the opportunity to participate on a level basis with the Council, developers, and other influential and quasi statutory bodies such as the Local Enterprise Partnership. A draft of such a Bill of Rights is appended to the end of this submission.
 - (a) We are concerned about secretive agreements and arrangements. Why doesn't the LEP have citizen representation? Why is Coventry Council entering into a protocol with the LEP which appears to prioritise growth over all other planning objectives: nature, health, education, biodiversity, landscape, heritage, design, low carbon transport, air quality etc.
2. It has been our experience, time and again, that so called measures for public consultation, on both local plans and building applications, are tardy, and paltry.
 - (a) For example, Coventry Council began preparing and consulting on the Core Strategy of 2009 in 2005, when this Statement of Community Involvement was in effect. . Most local residents in Keresley, a directly and severely affected area, had never heard of the plans 4 years into the process in 2009, despite 2 rounds of alleged consultation. We spoke to thousands of residents. 13000 of them signed petitions around the city to save our greenbelt. The vast majority of of them had never heard anything about proposals to put 14000 homes onto greenbelt. They did not know that anything was afoot.
3. The Aarhus convention guarantees the public shall have the right to environmental information, participation and justice. The SCI engages both the issues of the right to information and the right to participation. As it stands, the document utterly fails to guarantee

those rights. The following points are relevant

(a) **time:** The public cannot participate in environmental decision making unless it has long lead times. The public is inherently disadvantaged, compared to either the Council, which has full time professional officers, and the developers, who have both time, and money to hire experts. In contrast, we, the public, have day jobs, children, gardens, sick parents, houses to decorate, cars to fix, scout packs to run, and many more tasks. It takes us a lot of time to study the issues, understand the law and the politics, and to draw people together. Inherently, the public is atomised - it takes a great deal of time and effort to alert people to what is possibly happening, get them together, and respond. Yet we see the public being given scant time to reply on consultations. 3 weeks is not enough for a building proposal, nor is 6 weeks enough for a local plan. Without adequate time, it is a charade to say that the public can participate in the decision making. Without adequate time and without adequate measures to alert the public, the convention right to participate is breached. The SCI needs practical measures which guarantee that the public shall receive information in good time, and have adequate time to respond. Simply asserting that 3 weeks is the "normal" time for consultation on a building application, (as in this document) does not make it compliant with the Aarhus Convention Rights.

(b) **Remedies:** the Council shall

- i. alert residents associations, and other interested groups as soon as any pre-application discussions take place between the Council and developers regarding building planning applications
- ii. advertise (in public places such as Libraries, Hospitals, schools, and council offices and on the Council website) for individuals and organisations to place themselves onto a register of parties interested in planning matters who will receive timely information by email. I have had many interactions with the planning department, submitted many comments on local plans and building applications, and no one has ever invited me to put myself on the register which the Council identifies in this document.
- iii. The Council shall alert by email persons and organisations on the register of local plans proposals, at the earliest stage, and possible building applications at the earliest possible stage (I.e. pre-application discussion) .
- iv. the Council shall seek **advice** from a panel of concerned environmental organisations in the city, on choosing effective means to alert the public
 - A. they shall consider: articles in the local press, radio interviews with talk programmes, posters in libraries, schools, clinics, social media, twitter, email notification, presentations to clubs, schools, large workplaces, inserts into the free newspapers, websites, bill boards, bus advertising, competitions,

and traveling exhibitions, any other method which seems effective to them.

B. This document says that it does not want to be prescriptive. In view of the failure of the consultation arrangements, it needs to be prescriptive about minimum measures, while encouraging a

C. the success of consultation measures shall be routinely, and quantitatively assessed, - through independent survey work - and published in the annual monitoring report.

D. It needs some mechanism to hold the Council to account for carrying out proper consultation and not making excuses. This could be an independent committee of councillors and citizens which could report to the full council and have the right to trigger a debate of the full council if consultation is not being carried out properly.

v. The time for public consultation shall be a **meaningful length of time**. 3 months is a minimum for building applications. 6 months is a minimum for a local plan which is going to last 10-20 years. The important point to bear in mind is that rushed consultation, is poor consultation - it is going through the motions only. Building work changes our environment forever. Taking things at a considered and deliberate speed, will provide better outcomes. The Aarhus Convention, the European SEA Directive, and academic meta studies, all agree that better decisions are reached where there is full public participation, which needs adequate time.

4. The process needs

(a) **independent approval:** independent review of plans for consultation.

This needs to take place outside the council - it can involve Friends of the Earth, the Warwickshire Wildlife Trust, Greenpeace, The Coventry Society, Coventry Natural History Society, Coventry and District Archaeological Society, the Ramblers, The local RSPB, The local national trust etc , and other bodies which wish to put themselves forward. It is conspicuous that the organisations consulted about this document, and other early documents in the Core Strategy process, did not have an environmental focus. Play groups, health groups, educational groups were consulted but not the groups with obvious knowledge and expertise of the environment. Going through the motions of consultation is not good enough. A few small box adverts in the paper is not good enough. It needs to have a wholehearted and thoughtful approach.

(b) **Funding:** The council must commit to funding consultation measures at a proportionate level. It is not acceptable for the Council to spend £500,000 on consultants, for a process, and just £3000 on consultation for a core strategy, as in 2009. Consultation needs to have adequate funding. Otherwise, it is just tokenism. The independent reviewers (in the paragraph above) shall give their view on whether or not the budget for consultation is adequate and likely to be

effective.

- (c) **Verification:** Independent evaluation of the success of consultation. After every major consultation process (on a big project) or on a local plan, random interviews (by street interview, phone post or email) need to be done to find out if the consultation process worked or not. The Council shall have a duty to regularly verify its consultation measures. Excuses, that we tried to tell people, are not good enough. The Council needs to find out what measures are working, and which are a waste of time. They should find out, by scientific sampling:
- i. Were the public aware of the proposals or plans? How many knew about the proposals; what percent didn't?
 - ii. Did they feel that they had adequate information? Did they feel that they were easily able to obtain the information they needed?
 - iii. Did they feel that it was easy to respond
 - iv. Did they feel that they had enough time to properly respond.
- (d) **Transparency:** These evaluations should be published as part of the Annual Monitoring Reports.
- (e) Any assessment of consultation must be clearly independent of the council and professional planners and authorities, which have common interests. .
- i. We are not satisfied with so called peer review processes.
 - ii. The peer review carried out after the Core Strategy in 2009-10 was a whitewash. The reporting panel ignored what the public told them about the poor quality of the process. .
- (f) **Site notices** (at least A3, and bright yellow) shall be posted for any building application and any site allocation of more than 10 homes in the LDF process. At least 4 notices should be put up. An auditable record shall be kept of when they were posted (photographs with a date mark). All too often, we see them appear at the end of a consultation period. They must go up at the beginning.
- (g) 100 Neighbour letters, for any plan for 10 or more houses, or for any commercial, civic, or industrial project, shall be distributed locally at the expense of the developer. 100 neighbour letters shall go out for all building proposals. Letters to neighbours directly adjacent, is not enough - people down the street will care what happens in their area, just as much. The local paper or convenience shop is also a good location for a site notice.
- (h) City wide measures for any local plan -
- i. articles and inserts into the free papers and the council paper
 - ii. interviews with the local radio and TV (they are hungry for stories, debates, and discussions)
 - iii. well leafletted local meetings
 - iv. meetings in conjunction with local residents groups to get people to attend.
 - v. Bus advertising

- vi. library displays
- vii. a dedicated touring bus, to go round shopping centres. With displays
- viii. presentations at schools, clubs, etc -
- ix. Advertorial articles prepared for the Telegraph and Observer.

5. Participation in the planning committee

- (a) The Aarhus convention guarantees the right of the public to participate in environmental decision making
 - (b) Limiting the public, to 2 speakers, who get 3 minutes each to present complex and varied issues, cannot be considered effective or adequate participation. Imagine a criminal trial, where the defence lawyer was only allowed 3 minutes to speak and could not cross question prosecution witnesses. It could not be fair. And would be a travesty, yet this is what happens at the planning committee, where decisions are often made that can never be undone, and which change or natural and built world permanently.
 - (c) The public must have rights to speak, equal to the council officers. They must have a right to reply to what the officers, and what the councillors say. Critically they must have adequate time to challenge flimsy and incomplete evidence. They must have equal access to facilities such as projectors. Their time for speaking should not be any less than that for officers or councillors. The present rules do not allow participation. They function to gag the public.
 - (d) From the viewpoint of soundness, the proposed statement of community involvement does not meet the legal requirements of the Aarhus Convention for participation.
 - (e)
6. Further Comments: The Corporate Plan, on page 17, is blind to issues of environment.
- (a) The latest core strategy crudely recognises the importance of environment to a large number of city residents, in a pledge not to build on greenbelt or greenfield sites.
 - (b) The Council needs to investigate and unpick the groundswell of public feeling for greenbelt to articulate a well developed environmental policy.
 - (c) I suggest such an environmental policy would have the following elements
 - i. the council will aim to be a leafy green city, with plentiful woods, mature, trees, hedges, green open spaces, and diverse wildlife habitats
 - ii. The council recognises the benefits of nature, and trees for physical and mental health (these are now scientifically established)
 - iii. the council will protect wildlife in the city

- iv. the city will strive to be a low carbon city
- v. the city will actively provide for environmentally friendly transport, cycling, walking, and public transport.
- vi. the city will look to promote high quality high density development, on the model of European cities like Amsterdam or Paris, rather than urban sprawl
- vii. the city will seek to be a zero waste city.
- viii. The city will recognise the benefits for air quality of greenspace, (roadside trees reduce PM10s by up to 30%) and trees and give natural spaces priority in planning.

(d) Ward forums:

- i. the public does not have confidence in ward forums, as currently run.
- ii. Time and again we have seen discussion of planning issues stifled in the meetings. The chairs have obstructed the public in addressing urgent planning issues/
- iii. We see the meetings truncated and inadequate time allocated to planning issues.
- iv. Ward forums should be chaired and run by local community groups, not council officers or councillors.
- v. Otherwise, they become exercises in offering excuses and self justification.

(e) 7.5 - 'who we will consult with on the Local Development Plan.'

- i. Once again, there is no identifiable group with environmental focus and expertise. This is a nonsense when planning environmental measures.

(f) Sustainability appraisals

- i. there is no detail of how such appraisals will be done
- ii. from experience, they are extremely vague and qualitative
- iii. any useful sustainability appraisal needs to be quantitative and subject to challenge and review
- iv. it should consider quantitatively
 - A. impacts on traffic, air quality, biodiversity, wildlife, low carbon travel, education, surgeries, hospitals, shopping patterns, recreational uses, health, jobs, public transport,
 - B. it should be based on good evidence and modelling.
 - C. Otherwise they are a waste of time and effort.

(g) Publish the numbers! - in the SCI, you report the preferred method of communication of questionnaire respondents. You say that 61% of respondents preferred to receive a letter. You do not report that there were extremely few respondents to the survey (from memory, it was less than a 100). Without numbers, it amounts to a claim to authority and legitimacy which is not justified.

(h) The SCI states that residents groups will receive a weekly list of planning applications. I am well known to the planning department,

and in two years, I have never ever received a weekly list of applications. **The promises made in this worthy document are simply not kept.**

- (i) **Site notices should be mandatory, not discretionary.** As primitive as they are, they are not a bad method of informing local people.
- (j) **Neighbour letters** must go out to more people than just the immediate neighbours. This unfairly restricts the flow of information. People who live just down the street, will also have a keen interest in what happens in their neighbourhood. I suggest that a minimum of 100 neighbour letters should be distributed for all planning applications, and a minimum of 1000 letters should be distributed for an ldf site allocations of more than 10 homes during the core strategy/local plan process. (the developers have no qualms about littering our streets with copious signs once they have planning permission and are building – they should be required to make a similar and proportionate expenditure in informing us at the pre-application and application stages of seeking planning consent.
- (k) There is a well developed local service sector for delivering letters and flyers by hand to homes, for a small fee, much less than royal mail postage. (ask the Pizza restaurants, and chinese takeaways how to do it) Delivering substantial numbers of neighbour letters need not be an onerous expense.
- (l) Similarly, site notices (at least 4 at A3, in bright yellow) should be put up for any site allocation of more than 10 homes in the local development plan/core strategy so people will know what is planned for their area.
- (m) Advertising in the back of the Telegraph, on its own, is completely ineffective. It is far better to invest the money in site notices and neighbour letters.

We call for a BILL OF RIGHTS IN PLANNING, to guarantee

- the right of the public to know about planning proposals at the very earliest stage –
 - That when a council has a pre-application discussion with any developer, this must be declared immediately, with maps, and full particulars.
 - That any council, or planning application, and any consultation, must be effectively publicised – that all planning authorities must maintain an up-to-date email list of interested persons, which is freely open for anyone to register with.
 - That any council must erect site notices, in prominent locations, that are the size of a conventional For Sale signboard
 - That the council must maintain a website that easily gives information about planning proposals, and policies by postcode, proposer, and subject matter.
 - That any council must deliver neighbour notices, in the event of any proposal
 - A council must prove its publicity was effective, by random survey.
- That consultation periods must be long enough for the public to organise itself and present its views. This is a minimum of 12 weeks.

- That the view of the public must have substantial weight in any decision.
 - That if a planning authority rejects the majority public view, it must present a reasoned argument as to why it has rejected the public view.
 - That there shall be a public right of referendum on planning proposals, to be triggered by a petition of 4% of the electorate in any planning authority.
 - That the public shall be entitled to legal aid in planning disputes, without reference to means testing, provided they can produce a petition of 4% of the electorate.
 - That environmental justice, biodiversity, climate and human health shall have equal weight with government legislation.
- That the public and third parties shall have a right to appeal planning decisions to the planning inspectorate, just as developers can do.

These practical measures simply enact rights already guaranteed to UK citizens by international law. The Aarhus Convention, which the UK has signed and is binding in UK law, guarantees the right of the public to have access to environmental information, the right to participate in environmental decisions (including planning) at an early stage before decisions are reached, and the right to have access to environmental justice – to rights of appeal – at low cost.

The European Directive on Environmental Information **2003/4/EC already** enshrines in law, the principle that “more effective participation by the public in environmental decision-making ...[leads to], to a better environment.”

We ask for measures to make this a reality – that the public has a right to fully take part in planning decisions that radically affect our health, our lives, and our communities. Lip service is not enough.

We are only asking for our existing legal rights, guaranteed by European law and international treaty.

Cabinet
Council

10 July 2012
24 July 2012

Name of Cabinet Member:

Cabinet Member (City Development) - Councillor Kelly

Director Approving Submission of the report:

Director of City Services & Development

Ward(s) affected:

All

Title:

Warwick District Council New Local Plan Preferred Options consultation

Is this a key decision?

No

To respond to the Warwick District Council "New Local Plan Preferred Options" consultation.

Executive Summary:

Warwick District Council has published its "Preferred Options" Local Plan for consultation. This sets out land that it considers is suitable for development, and states which land is 'preferred' for development. It is considered that, in general terms, the Preferred Options can be supported, but two "potentially suitable" sites to the south of Westwood Heath, and to the east of Finham, should remain as undeveloped Green Belt land.

Recommendations:

The Cabinet is requested to:

- 1) Recommend that the Council approve the response to Warwick District Council New Local Plan Preferred Options consultation, at Appendix 1

The Council is requested to:

- 2) Approve the response to Warwick District Council New Local Plan Preferred Options consultation, at Appendix 1

List of Appendices included:

Appendix 1: suggested response to the Warwick District Council New Local Plan Preferred Options consultation

Appendix 2: WDC's Map 2 – potentially suitable urban – edge of urban sites

Appendix 3: WDC's Map 3 – preferred options

Other useful background papers:

Warwick District Council New Local Plan Preferred Options Consultation, available to download at www.warwickdc.gov.uk/newlocalplan

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

Yes

24 July 2012

Report title: Warwick District Council New Local Plan Preferred Options consultation

1. Context (or background)

- 1.1 Warwick District Council has published its Local Plan "Preferred Options" for consultation. This includes proposed site allocations to deliver growth, and some of these sites are currently undeveloped Green Belt land. It is considered that this is a matter for Warwick District Council as planning authority, and therefore no objection in principle to this is recommended.
- 1.2 The draft site allocations are shown on Map 3, which can be found at Appendix 3. It is not recommended that any comments be made with respect to this.
- 1.3 A map of "potentially suitable" sites includes some undeveloped Green Belt land immediately to the south of Westwood Heath, and east of Finham. Map 2 at Appendix 2 refers. It is recommended that the Council objects in principle to the possibility of development of these sites, because it is likely that the burden of servicing the infrastructure requirements of those developments would fall on the City Council in the medium term, but that the corresponding Council Tax revenues would be received by Warwick District Council.

2. Options considered and recommended proposal

- 2.1 There are two realistic options available. The first of these is to remain silent, this was rejected because it is in the Council's interests to formally express its wish for the land south of Westwood Heath, and land to the east of Finham, that is identified as a "potentially suitable" site to remain as undeveloped land within the Green Belt.
- 2.2 The second option, which is recommended, is to formally respond in support of the Preferred Option, subject to the identified "potentially suitable" sites south of Westwood Heath and east of Finham remaining as undeveloped land in the Green Belt.

3. Results of consultation undertaken

- 3.1 There has been no consultation undertaken

4. Timetable for implementing this decision

- 4.1 The deadline for responses to the consultation is Friday 27th July 2012. It is intended that the response be sent as soon as practicable following the Council meeting of 24th July, on or before 27th July.

5. Comments from Director of Finance and Legal Services

- 5.1 Financial implications

There are no costs for the Council, directly associated with this consultation or the recommendations in this report.

- 5.2 Legal implications

It is considered that responding to this consultation will assist both Warwick District and Coventry City Councils to demonstrate compliance with the Duty to Cooperate as set out in the Localism Act 2011, associated regulations, and the National Planning Policy Framework 2012

6. Other implications

There are no other specific implications

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

The Warwick Local Plan will contribute to a number of the City Council's core aims as follows:

- A prosperous Coventry: by working together to prepare an integrated development strategy to offer employment opportunities to local people, this is particularly the case for the Gateway scheme;
- Making Coventry an attractive and enjoyable place to be. Provided the "potentially suitable" land to the south of Westwood Heath, and the land to the east of Finham, remains undeveloped, the strategy does not significantly negatively impact on the quality or attractiveness of Coventry;
- Providing a good choice of housing. The Warwick Local Plan Preferred Option sets out a number of potential sites for new homes to be built, offering a choice that can be expected to be available to local people throughout the area; and
- Improving the environment and tackling climate change, by focussing new development in accessible and sustainable locations that minimise the need to travel.

6.2 How is risk being managed?

The key risk associated with the proposal is concerned with technicalities around the Duty to Cooperate. The current conventional wisdom is that the duty is to cooperate and not necessarily to agree with all aspects of a plan. By expressing general support subject to a single specific point, it is considered that the Council would be acting responsibly and would not be placing either the Coventry or the Warwick Core Strategy at risk.

6.3 What is the impact on the organisation?

No direct impact.

6.4 Equalities / EIA

It is Warwick District Council's responsibility to complete an Equality Impact Assessment to inform its own Core Strategy.

6.5 Implications for (or impact on) the environment

The Warwick Local Plan will be accompanied by a Sustainability Appraisal, in accordance with relevant regulations, that will assess the environmental implications of the Preferred Options.

6.6 Implications for partner organisations?

The recommended response to the consultation that appears at Appendix 1 asks Warwick District Council to retain the land south of Westwood Heath, and the land to the east of Finham, as undeveloped land within the Green Belt.

Report author(s):

Name and job title: Jim Newton, Planning & Policy Manager

Directorate: City Services & Development

Tel and email contact: 024 7683 1187, email jim.newton@coventry.gov.uk

Enquiries should be directed to the above person.

Contributor/approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Colin Knight	Assistant Director (Planning Transportation & Highways)	CSDD	07-06-12	11-06-12
Names of approvers for submission: (officers and members)				
Finance: Phil Helm	Finance Manager (City Services & Development)	Finance & legal	07-06-12	11-06-12
Legal: Clarissa Evans		Finance & legal	07-06-12	08-06-12
HR: Jaz Bilen	HR Manager	Customer & Workforce Services	07-06-12	07-06-12
Director: Martin Yardley	Director of City Services & Development	CSDD		
Members: Cllr Kelly	Cabinet Member	City Development	13-06-12	13-06-12

This report is published on the council's website:
www.coventry.gov.uk/councilmeetings

Appendices

Appendix 1: suggested response to the Warwick District Council New Local Plan Preferred Options consultation

Appendix 2: WDC's Map 2 – potentially suitable urban – edge of urban sites

Appendix 3: WDC's Map 3 – preferred options



**City Services and Development
Directorate**

Mr Dave Barber
Development Policy Manager
Warwick District Council
Riverside House
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Leamington Spa
CV32 5HZ

Planning Policy Team
City Services & Development
Directorate
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Coventry CV1 2PY

Please contact: Jim Newton
Direct line 024 7683 1187
Fax 024 7683 4372
E-mail: jim.newton@coventry.gov.uk

Reference:

Date: 24 July 2012

Dear Dave

Warwick Local Plan Preferred Options

I am writing on behalf of Coventry City Council, following its meeting today, at which it considered its response to the Warwick Local Plan Preferred Options consultation. Thank you for the opportunity to make comments.

Coventry City Council broadly supports the strategy, subject to the "potentially suitable" land immediately to the south of Westwood Heath, and the land to the east of Finham, remaining as undeveloped Green Belt land.

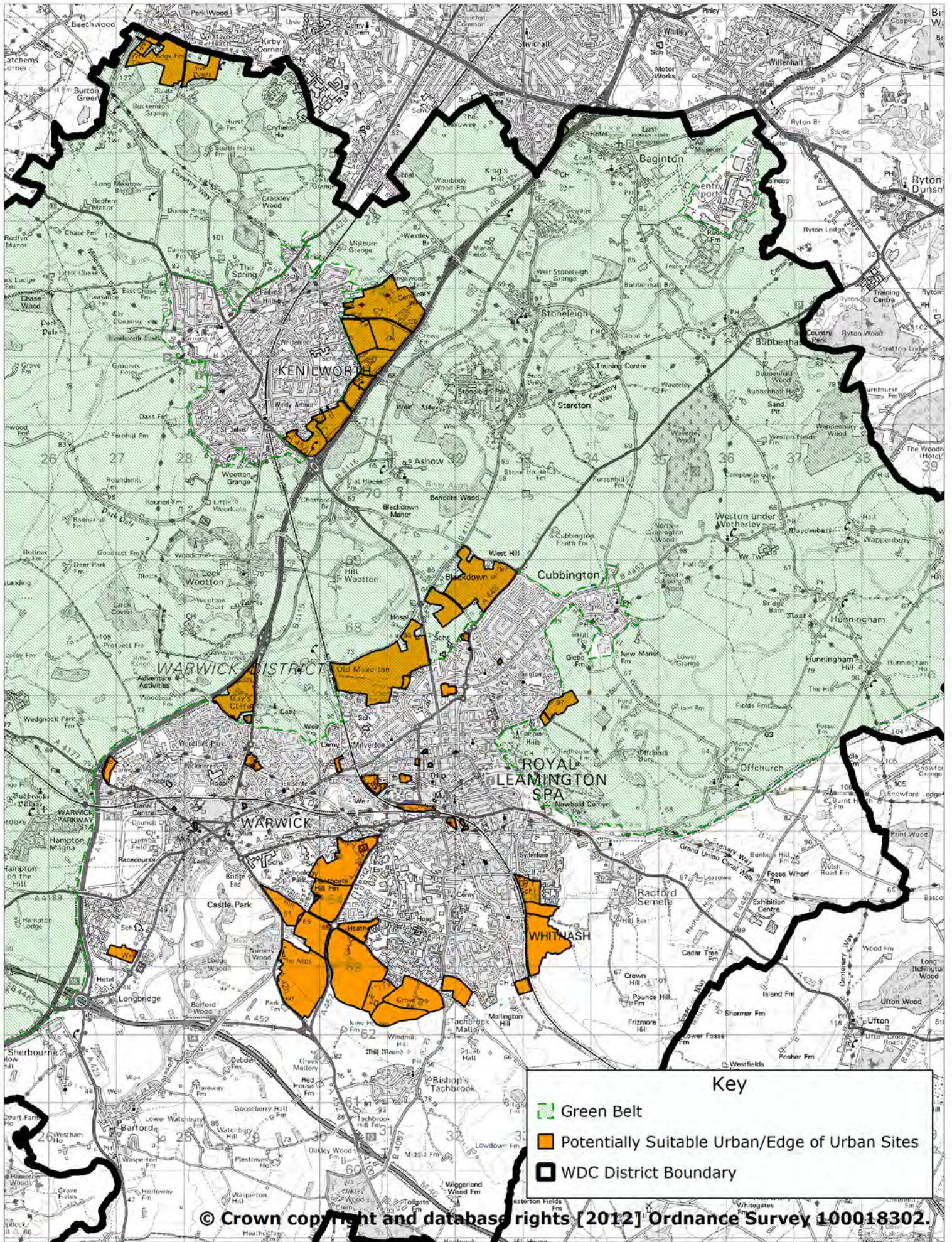
I attach for your reference a copy of the report that was considered by the Council.

Yours sincerely

Jim Newton
Planning Policy Manager

Enc.

*Director of City Services and
Development*
Martin Yardley
Assistant Director
**Colin Knight, Assistant Director for
Planning, Transport & Highways**



**Map 2: Strategic Housing Land Availability Assessment 2012:
Potentially Suitable Urban/Edge of Urban Sites**

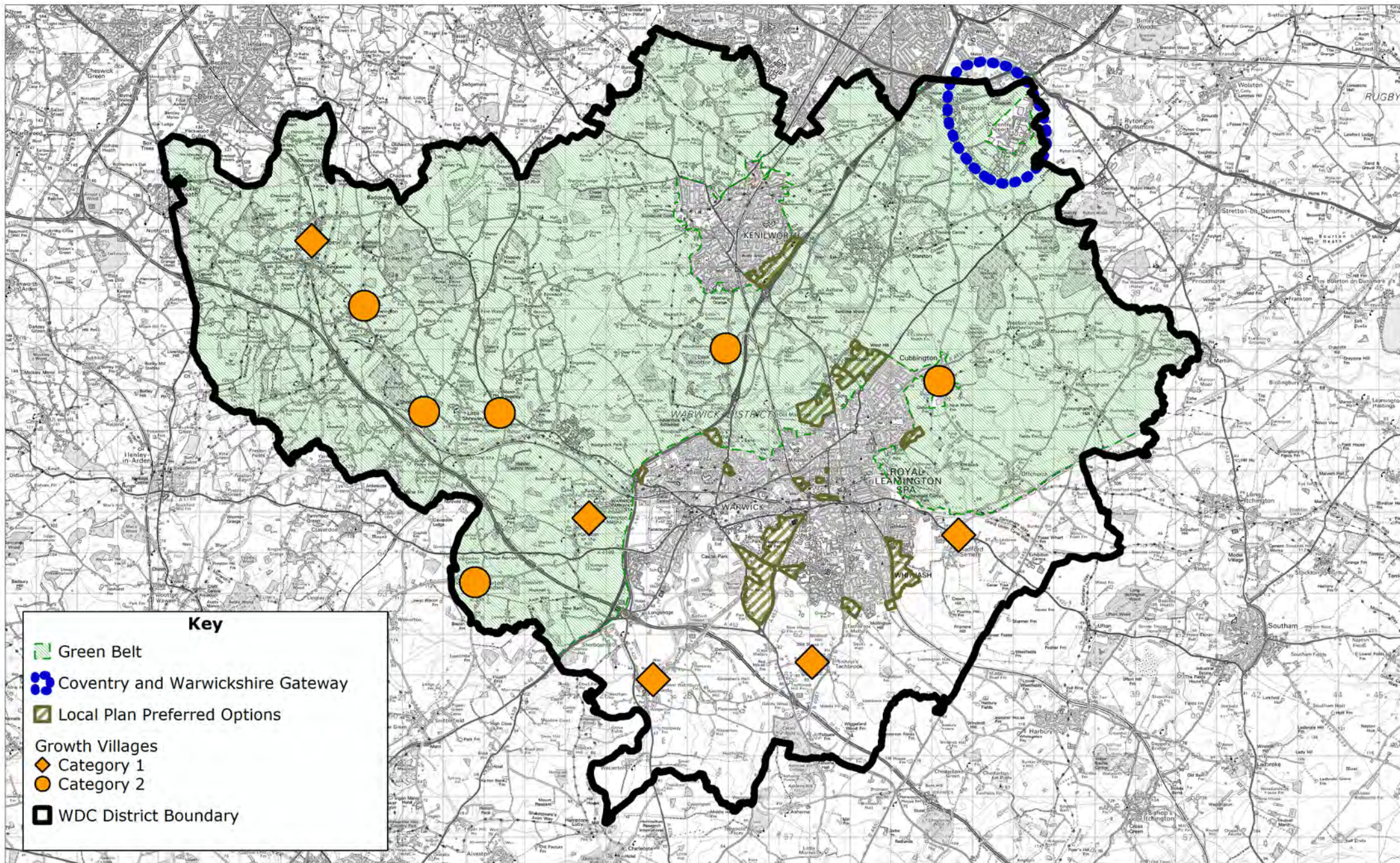
Not to Scale

Date: 17 May 2012

North



Riverside House, Milverton Hill, Royal Leamington Spa, Warwickshire. CV32 5HZ Tel: 01926 410410



Map 3: Development Sites - Preferred Option (Whole District)



Not to Scale

10 May 2012

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Riverside House, Milverton Hill, Royal Leamington Spa, Warwickshire. CV32 5HZ

Tel: 01926 410410



Cabinet
Council

10 July 2012
24 July 2012

Name of Cabinet Member:

Cabinet Member (Policy, Leadership and Governance) - Councillor Mutton

Director Approving Submission of the report:

Director of Customer and Workforce Services

Ward(s) affected:

All

Title:

Review of the Members' Allowances Scheme

Is this a key decision?

No

Executive Summary:

Cabinet and Council are requested to consider the recommendations that have been made by the Independent Remuneration Panel (IRP) on the Review of the Members' Allowances Scheme in Appendix A. A supplementary report was submitted in June 2012, attached in Appendix B.

Recommendations

Cabinet is requested to:

- (1) Consider each recommendation within the IRP's report
- (2) Make a recommendation to Full Council as to whether each recommendation should be approved, rejected, or an alternative proposal approved.
- (3) Approve the timescale for next IRP as set out in para 2.8.

Council is requested to:

- (1) Acknowledge the work of the IRP for undertaking the review
- (2) Consider each recommendation within the IRP's report
- (3) Note the recommendations of Cabinet
- (4) Approve, reject or approve alternative proposals for each of the following recommendations made in the IRP's report:

R1 Basic Allowance remains at the existing level of remuneration, currently £12,872 pa.

R2 Basic Allowance is paid to every elected Member i.e. including the Member elected as Lord Mayor.

- R3 Special Responsibility Allowances (SRAs) for Leader, Deputy Leader, Cabinet Members, Leader of the Principal Opposition Group, Chairs of Scrutiny Boards and Chairs and Deputy Chairs of the Scrutiny Co-ordination, Planning, Licensing and Audit Committees remain at the existing levels of remuneration.
- R4 Current SRA for the Lead Member for Standards be discontinued.
- R5 Responsibility allowance of £1,000 is paid to the Chair of the Ethics Committee.
- R6 Deleted (see Supplementary Report Appendix 2).
- R7 SRAs for Deputy Chairs of Scrutiny Boards be reduced from £2,578 to £1,000. *[This excludes Deputy Chair of Scrutiny Co-ordination Committee as per R3].*
- R8 Additional SRAs be approved for elected Members appointed to the authority's Fostering Panel and Adoption Panel, these SRAs to be set at £2,578.
- R9 The recommended revised list of SRAs is:-

Special Responsibility Allowances	£ per annum
Leader of the Council	£23,169
Deputy Leader of the Council	£16,731
Other Cabinet Members (8)	£10,299
Chair of Scrutiny Co-ordination Committee	£10,299
Deputy Chair of Scrutiny Co-ordination Committee	£2,578
Chairs of Scrutiny Boards (6)	£6,439
Deputy Chairs of Scrutiny Boards (6)	£1,000
Chair of Audit Committee	£6,439
Deputy Chair of Audit Committee	£2,578
Chair of Planning Committee	£6,439
Deputy Chair of Planning Committee	£2,578
Chair of Licensing & Regulatory Committee	£6,439
Deputy Chair of Licensing & Regulatory Committee	£2,578
Member of Fostering Panel	£2,578
Member of Adoption Panel	£2,578
Leader of Opposition Group	£3,860
Chair of Ethics Committee	£1,000

- R10 The City Council undertakes to produce formal job descriptions/person specifications of the roles and responsibilities of elected Members, particularly for positions which attract Special Responsibility Allowances.
- R11 Allowances paid to each co-opted Member appointed by the City Council remain at the existing level, currently £466 pa.
- R12 The Lord Mayor and Deputy Lord Mayor allowances be set at gross rate (before tax and National Insurance), in line with how basic allowances and other SRAs are treated.
- R13 Lord Mayor's gross allowance be reduced from £45,945 to £24,805 by (i) reducing it by the amount of the Basic Allowance (to be paid to the Lord Mayor separately) and (ii) by a further 25%.
- R14 Deputy Lord Mayor's gross allowance of £12,615 be reduced by 25% to £9,461.

- R15 The City Council undertakes greater promotion of the Dependent Carers' Allowance Scheme, particularly in relation to the objective of encouraging the broadest representation of society on the Council.
- R16 Notwithstanding the recent low level of claims for carers' allowances, specific budget provision, proposed at £2,000 pa, be made to underpin the Council's commitment to this scheme.
- R17 Basic, Special Responsibility, Co-optees, Lord Mayor and Deputy Lord Mayor allowances be increased each year by the percentage increase in pay agreed for local government employees (pegged to spinal column point 49 of the NJC Scheme); this indexing to be effective from 1 April 2012 and expire on 31 March 2016.
- R18 The 'Pick and Mix' allowance of £150 for each elected Member for stationery, equipment etc be abolished.
- R19 In the event of the City Council deciding to continue this [*Pick and Mix*] scheme the 'custom and practice', but currently unauthorised, additional allowances for Group Officers and the Leader be discontinued.
- R20 The Council introduces a single mode of provision of 'smart' phones for all Members, under authority-negotiated and financed contracts.
- R21 All other modes of telephone provision and associated allowances paid to Members be discontinued at the earliest opportunity.
- R22 The rates of travel and subsistence allowances paid to elected Members be the same as those paid to officers of the authority and revised annually in line with those allowances.
- R23 The attached outline scheme of travel and subsistence allowances (Appendix 4) be adopted.
- R24 Following the determination of the issue of whether or not Coventry has an elected mayor, a full, in depth review of the Coventry City [*Council*] SRA structure and allowance levels be undertaken by a future IRP.

List of Appendices included:

Appendix A – Report of the Coventry City Council IRP February 2012

Appendix B – Supplementary Report of the IRP June 2012

Other useful background papers:

Local Authorities (Members Allowances) Regulations 2003

<http://www.legislation.gov.uk/ukxi/2003/1021/contents/made>

2007 Council report 'Review of Member Allowances' -

<http://cmis.coventry.gov.uk/CMISWebPublic/Binary.ashx?Document=9529>

Has it been or will it be considered by Scrutiny? No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body? No

Will this report go to Council? Yes, 24 July 2012

Report title: Review of the Members' Allowances Scheme

1. Background

- 1.1 All local authorities are required to have a Member Allowances and Expenses scheme which makes provision for a range of allowances and expenses available to some or all elected Members. This must be agreed locally, in accordance with the Local Authorities (Members Allowances) Regulations 2003 (as amended).
- 1.2 A local authority must review its allowance provisions at least once every four years if it has agreed to index-link its scheme of allowances. Coventry has index-linking arrangements for Member allowances; they are increased in line with the nationally-agreed annual pay award for local government employees, at spinal point 49 of the National Joint Council (NJC) Scheme, in April each year. Pay increases were last awarded in 2009. The last review was in 2007/08, reporting to Cabinet and Council in December 2007.
- 1.3 Whilst each authority approves its own scheme, it is legally required to appoint an Independent Remuneration Panel (IRP) to make recommendations on allowances and expenses. The Council must have regard to its recommendations. An IRP was appointed in October 2011 to undertake a review of the City Council's Members' Allowances Scheme.
- 1.4 In accordance with the Regulations in section 1.1, the scope of the Panel's review was:
 - the annual adjustment (index-linking) of allowances
 - basic and special responsibility allowances paid to elected Members
 - co-optees allowances paid to Co-opted Members
 - consideration of allowances for Members of the Fostering Panel/Adoption Panel
 - Member expense arrangements including travel and subsistence
 - remuneration levels for the Lord Mayor and Deputy Lord Mayor positions.

2. Options considered and recommended proposal

- 2.1 A Panel was constituted in October 2011 to review the Council's Members' Allowances Scheme. The Panel Members appointed were:
 - Bruce Undy (Chair), Federation of Small Businesses, Managing Director
 - Stephen Banbury, Voluntary Action Coventry, Chief Executive
 - Sarah Chand, Coventry, Staffordshire & West Midlands Probation Trust, Head of Probation
 - Steve Stewart, Coventry Solihull & Warwickshire Partnership Ltd Chief Executive
- 2.2 The Terms of Reference were agreed and information about the review was published on the City Council's website. Four meetings were held, between November and February. The Panel were given a variety of information to assist them. This included:
 - 2003 Member Allowances Regulations
 - information on the Council's structure and organisation
 - reports of previous Coventry IRP Panels
 - the current Members' Allowances Scheme
 - benchmarking comparisons from other councils analysing their basic, mayoral and special responsibility allowances (including SRAs for Fostering Panel and Adoption Panel Members) and their travel and subsistence schemes
 - background information on Coventry's Fostering and Adoption Panels
 - budgetary information on allowances and expenses
 - custom and practice at Coventry City Council
 - note on Mayoral duties and budgets
 - Coventry Care charging levels
 - views of the Leader of the Council and Leader of the Opposition Group.

- 2.3 The meetings were facilitated by West Midlands Councils' Associate Steve Hind, who assisted the Panel in drafting their report and pulling the recommendations together. The Panel were working from allowance figures for 2010-11.
- 2.4 The Panel have made 23 recommendations, with a detailed account supporting each recommendation. These are set out in pages 1-3 of this report, and in full detail in the Panel's report in Appendix A (note: Recommendation 6 has subsequently been deleted from the original 24, as explained in Appendix B). The recommendations all relate to points highlighted in section 1.4 above:
- annual adjustment (index-linking) of allowances
 - basic and special responsibility allowances paid to elected Members
 - co-optees allowances paid to Co-opted Members
 - consideration of allowances to be paid to Members sitting on both the Fostering and Adoption Panels
 - Member expense arrangements including travel and subsistence
 - remuneration levels for the Lord Mayor and Deputy Lord Mayor positions.
- 2.5 The Panel have recommended keeping the basic allowance at its current level, £12,872. The Panel have recommended changes to allowances for Members as set out below:

Member Role	Current allowance £ per annum	Panel allowance recommended £ per annum	Change £
Leader of the Council	23,169	23,169	0
Deputy Leader of the Council	16,731	16,731	0
Other Cabinet Members (8)	10,299	10,299	0
Chair of Scrutiny Co-ordination Committee	10,299	10,299	0
Deputy Chair of Scrutiny Co-ordination Com'tee	2,578	2,578	0
Chairs of Scrutiny Boards (6)	6,439	6,439	0
Deputy Chairs of Scrutiny Boards (6)	2,578	1,000	-1,578
Chair of Audit Committee	6,439	6,439	0
Deputy Chair of Audit Committee	2,578	2,578	0
Chair of Planning Committee	6,439	6,439	0
Deputy Chair of Planning Committee	2,578	2,578	0
Chair of Licensing & Regulatory Committee	6,439	6,439	0
Deputy Chair of Licensing & Regulatory Com'tee	2,578	2,578	0
Member of Fostering Panel	0	2,578	+2,578
Member of Adoption Panel	0	2,578	+2,578
Leader of Opposition Group	3,860	3,860	0
Chair of Ethics Committee (new from 1/7/12)	0	1,000	+1,000
Lead Member of Standards Committee	2,578	0	-2,578
Lord Mayor *	33,073 *	24,805	-8,268
Deputy Lord Mayor	12,615	9,461	-3,154

* The current amount is shown as £33,073 (=£45,945 minus basic allowance of £12,872) for comparative purposes. The Lord Mayor does not currently receive a basic allowance payment. The Panel is recommending the Lord Mayor should receive a basic allowance and a Mayoral allowance.

- 2.6 The decision to approve these recommendations is the City Council's. The Council must have regard to the recommendations made by the IRP before it amends any part of the current Member Allowances scheme. The City Council is requested to consider these recommendations individually and state whether each recommendation is approved or rejected. The Council is not bound by the recommendations of the Panel and may reject any of the proposals made, but the City Council must have regard to the implications of such decisions; the report indicates that if some of the recommendations are not accepted then alternative provisions should be considered. These can be put forward and agreed. Where a recommendation of the IRP is rejected and/or an alternative provision put forward, the City Council should give reasons to support its decision in order to show that it has given full consideration to these recommendations.
- 2.7 The recommendations are being proposed separately rather than as a whole set, this means that the City Council can accept, amend or reject individual recommendations. If some recommendations are rejected, then the remainder can be implemented.
- 2.8 In undertaking the work, the Panel Members sought to take a balanced view given the time commitments and responsibilities of councillors. They were aiming to provide adequate remuneration for these commitments, and to reduce financial barriers to becoming a councillor, whilst not forgetting the severe current economic situation and financial constraints placed on the City Council.
- 2.9 There is a requirement for both the IRP recommendations and the authority's response to be widely publicised. Recommendations that are approved will need to be incorporated in a revised scheme of allowances and expenses to be published within the Council's constitution.
- 2.10 It is proposed that the timescales for the next IRP be agreed in advance to aid planning. The next Panel needs report by March 2016 at the latest. A draft timetable is set out below:
- establish Panel Membership January 2015
 - Panel meetings held March 2015 – Sept 2015
 - draft report produced – Oct 2015
 - report considered by Cabinet and Council – by January 2016.

3. Results of consultation undertaken

- 3.1 Views of the Leader of the City Council and the Leader of the Opposition were sought in order to assist with the Panel's deliberations on the scheme of allowances.

4. Timetable for implementing this decision

- 4.1 For the recommendations approved relating to allowances, these will take effect from 17 May 2012 after the Annual General Meeting. The proposed index-linking is to be effective from 1 April 2012 and will expire on 31 March 2016.

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

- 5.1.1 On the basis of all the principal recommendations being approved by Council, the Panel has calculated that this will result in a net budget reduction of £24,723 as shown in the table overleaf. However, taking into account the additional costs of SRAs for the Chair and Deputy Chair of the new sixth Scrutiny Board, totalling £7,439, the net saving is £17,282.

Reductions in Allowances	Reduction £	Increase £	Net change £
Discontinuation of SRA for Member Responsible for Standards	(2,578)		
Reduction in SRAs for Deputy Chairs of Scrutiny Boards (5x £1,578)	(7,890)		
Reduction in Lord Mayor's Allowance	(21,140)		
Reduction in Deputy Lord Mayor's Allowance	(3,154)		
Reduction in authority NI payments for Member allowances (this will vary, dependent on what the contributions are per Member).	(1,489)		
Discontinuation of 'Pick and Mix Allowance	(9,500)		
Increases in Allowances			
Payment of Basic Allowance to Lord Mayor		12,872	
SRA for Chair of Ethics Committee		1,000	
SRAs for Members on the Fostering and Adoption Panels (2x£2,578)		5,156	
Budget provision for Dependent Carers Allowances		2,000	
Totals	(45,751)	21,028	
Net change in allowances			(24,723)
Total budget allocations for Member allowances and expenses (including Lord Mayor and Deputy Lord Mayor Allowances) – budget shown only what is payable to Members			1,063,493

5.1.2 The Panel have recommended that the rates of travel and subsistence allowances paid to Members be the same as those paid to officers and revised annually in line with those allowances. It is impossible to say what the budget impact will be, but it is likely that it will not be significant. The rates for officers are set out in the table below. The IRP report has assumed Paras 60-61) that the Basic allowance covers standard duties including attendance at council meetings and community meetings. The travel and subsistence scheme proposed by the Panel in Appendix 4 to its report excludes travel and subsistence within the City boundaries for these standard duties.

Current travel and subsistence rates for Members and officers

Rates for	Members	Officers
Travel	Up to 999cc 34.6p per mile 1000-1199cc 39.5p per mile Over 1199cc 48.5p per mile	Private car 45p per mile Private motor cycle 24p per mile Private bicycle 20p per mile -within HMRC's PAYE dispensation Leased car 11.87p per mile
Subsistence	Breakfast £3.92 Lunch £6.77 Tea £2.67 Dinner £8.38	Breakfast (where absence is before 7am away from main workplace) £5.91 Lunch £8.37 Tea (where dinner isn't claimed) £3.49 Dinner (where absence is after 7pm away from main workplace) £10.22
Overnight subsistence allowance	24 hrs outside London £79.82 24 hrs in London £91.04	Bed & breakfast -outside London £61.80 Bed & breakfast -in London £93.20

5.1.3 The Panel have also recommended that all Members be offered a smart phone, under Council contract and that allowances for telephone expenses be discontinued.

5.1.4 In 2011/12, the Council spent £17,862 on all phone-related provision including: £5,200 for Member phone expense claims, blackberry bills for 11 Cabinet Members/Committee chairs and payment for all Council House phone lines and calls for phones in Member offices. This spend did not include outlay on providing new phone handsets. In 2011/12, 24 Members submitted phone expense claims and 8 had a Council mobile phone. Expenses for both these are currently capped at £152.65 per quarter for each Member, but few Members claim this amount.

5.1.5 An estimate of potential running costs (excluding calls) are shown below for a notional take up of 24 devices.

Smartphone costs (excluding calls)	Purchase cost	Rental cost per annum	Total cost year 1	Total cost over 3 years
Standard Mobile Phone	£43	£6	£49	£61
Smartphone	£177	£83	£260	£426
Blackberry	£165	£126	£291	£543
Cost for 24 Mobile Phones	£1,032	£144	£1,176	£1,464
Cost for 24 Smartphones	£4,248	£1,992	£6,240	£10,224
Cost for 24 Blackberrys	£3,960	£3,024	£6,984	£13,032

5.1.6 This cost excludes call costs. Should the Council approve the recommendation to offer all Members a smartphone, further work is needed on how this is implemented and the impact on Members who prefer different alternatives to smartphones. It is important that the ICT and phone spending does not increase overall, as well as ensuring all Members are supported effectively, and are able to use ICT and phone channels that work well for them.

5.1.7 The provision and cost of smartphones is linked to the Members' ICT equipment policy. This is currently being revised by the Council. Members will be offered a choice of equipment in future and it is intended that a smartphone will be part of the menu. Members will be able to choose between a council laptop or a tablet or a smartphone.

5.2 Legal implications

5.2.1 There is a legislative requirement for Member allowances to be reviewed at least once every four years for the purpose of agreeing how it will index-link its scheme of allowances. The Council must have regard to the recommendations made by the IRP and determine whether and how these are implemented. The City Council must have regard to the recommendations made by the IRP before it amends any part of the current Members' Allowances Scheme.

6. Other implications

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

The recommendations from the Panel must be considered by the Council to ensure it meets its statutory obligations around Member allowances and expenses. Having an effective and up to date Members' Allowances Scheme in place ensures that elected representatives are supported fairly and appropriately for the roles they carry out. It should also help to attract quality candidates to stand as local councillors and to retain them.

6.2 How is risk being managed?

The key risks are as to whether the Members Allowances Scheme remains up to date and meeting all legal requirements to support and remunerate elected Members. The Council must demonstrate that all recommendations have been considered as part of the Panel's final report. This report ensures that this is the case.

6.3 What is the impact on the organisation?

If the move to smart phones were accepted, the difference to elected Members would be that they can work and access information in real time, they are less likely to need the support of staff or print paper and there would be faster decision making.

6.4 Equalities / EIA

The Panel recognise that the Dependant Carer's Allowance is an important feature of the Members' Allowances Scheme. It meets child and adult care costs in order to help attract people from all sections of the community to become councillors and retain them in that role. The City Council is asked to increase promotion of the scheme, including to prospective candidates.

6.5 Implications for (or impact on) the environment

If the proposal to move to smart phones were accepted, this would mean that less paper is used for diary management purposes and less printing of paper generally. It would save on electricity and energy as Members wouldn't be using laptops and it could reduce the amount of travel Members have to do.

6.6 Implications for partner organisations?

None.

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Report of the Coventry City Council Independent Remuneration Panel – February 2012

A. Panel Membership

Bruce Undy (Chair) (Federation of Small Businesses)
Stephen Banbury (Voluntary Action Coventry)
Sarah Chand (Probation Coventry)
Steve Stewart OBE (CWSP Careers Guidance Company)

Panel Support: Steve Hind, Independent Facilitator (West Midlands Councils)

B. Terms of Reference

- To review the City Council's scheme of Member Allowances and Expenses in accordance with the provisions of the Local Authorities (Members Allowances) Regulations 2003 (as amended) together with the associated guidance New Council Constitutions: Guidance on Regulation for Local Authority Allowances (2003), and to make recommendations to the City Council on any amendments to the scheme that the Panel considers necessary or appropriate.
- As a minimum requirement the Panel is asked to make a recommendation on the future method and period of indexing allowances.
- In undertaking the review the Panel should have regard to the role of allowances in underpinning local representative democracy; and should also have regard to the financial constraints on the authority.

Scope of the Panel's work

- To undertake a 'healthcheck' review of the existing Basic Allowance, Special Responsibility Allowances and Co-optees Allowances paid, and identify any anomalies they believe should be addressed.
- Such a review to include consideration of the roles of councillors as members of the authority's Adoption and Fostering Panels, currently not included in the scheme.
- To consider if and how and for what period allowances are to be annually adjusted.
- To review Member expenses arrangements including travel and subsistence.
- To review the remuneration of the Lord Mayor and the Deputy Lord Mayor.

C. Introduction

1. All local authorities are required to have a members allowances scheme, agreed locally, making provision for a range of allowances and expenses available to some or all elected members. Whilst each authority approves its own scheme each is legally required to appoint an Independent Remuneration Panel (IRP) to make recommendations on allowances including the amounts payable. An authority must have regard to the Panel's recommendations although it is not bound by them.

2. The independence of the IRP is an important matter. Not only does this ensure impartial advice but it 'sharpens' the accountability of the authority to its electorate. There is a requirement for both the IRP recommendations and the authority's response to be widely publicised.
3. The current Coventry IRP (the Panel) was constituted and first met in November 2011 with the above-mentioned terms of reference. It met on other occasions in January and February 2012. To underpin the independence of the Panel the City Council engaged an independent facilitator, through the West Midlands Councils organisation, to support its work and provide the necessary 'arms length' links with the authority.
4. The Panel's deliberations were assisted by a variety of sources of information including the legal framework, in particular the 2003 Allowances Regulations; information on the Council's structure and organisation; budgetary information; the views of the Leader of the Council and Leader of the principal Opposition Group; benchmarking comparisons with other authorities; and the reports of previous Coventry IRPs.
5. The Panel is indebted to officers of the City Council who provided additional information as requested, particularly Helen Abraham, Assistant Director Democratic Services and Mamta Dhand, Member Services Manager.
6. In undertaking this work the Panel members have had regard to the underlying philosophy of the changes to members allowances introduced by the Local Government Act 2000. This was to recognise the time commitments and responsibilities of councillors and provide reasonable remuneration for those commitments, with a view to reducing financial barriers to becoming a councillor. Representation on our councils from a broad cross section of society was, and remains, an important objective for a healthy local democracy.
7. On the other hand the Panel has been acutely aware of the sensitivity of payments to elected members, not only within the community and media but also within the Council itself. This sensitivity has been heightened by the severe economic situation and the financial constraints now placed on the City Council.
8. The Panel has sought to take a balanced view of these sometimes divergent pressures. Set out below are the details and outcomes of the Panel's review.

D. The IRP Review Outcomes

Basic Allowance

9. The flat rate Basic Allowance is that which an authority must provide for and which all members are entitled to. It is intended to recognise the time commitment of all councillors including dealings with constituents and council officers, attendance at council meetings, political group meetings, meetings of other community organisations etc. The Panel was informed of the historic construct of this allowance and made aware that previous IRPs had recommended certain increases which had not been approved by the Council.
10. Whilst there is no current pressure for any revision to the Basic Allowance the Panel felt it necessary, as part of its 'health check' review, to ascertain if the present allowance of £12,872 pa remains a reasonable amount. Comparisons with other authorities of the same type and size suggest that it does. Indeed the benchmarking exercise indicated that the Coventry allowance is one of the highest in its class [see Appendix 1]. The Panel does not suggest that this means it is excessive but in the light of this has decided not to propose any change to the current level of the Basic Allowance.
11. The Panel discovered that the Basic Allowance is not paid to the councillor who is elected as Lord Mayor, for the year they are in office. This is not normal practice in other authorities. The given reason for this in Coventry is that the demands on the Lord Mayor's time are such that he or she is unable to fulfil the normal ward/council duties. Whilst this rationale is understood the Panel believes this is in contravention of the 2003 Regulations which clearly state that a flat rate Basic Allowance is *"...payable to all members of the authority. The allowance must be the same for each member."* For this reason, and for reasons relating to the Lord Mayor's allowance (see para 36 below) the City Council is asked to ensure that the Basic Allowance is paid to all 54 elected members, including the Lord Mayor.

Recommendations:

- R1 That the Basic Allowance remain at the existing level of remuneration, currently £12,872 pa.
- R2 That the Basic Allowance be paid to every elected member including the member elected as Lord Mayor.

Special Responsibility Allowances (SRAs)

12. SRAs are the discretionary additional allowances paid to members who have significant additional responsibilities over and above the generally accepted duties of a councillor, for example the Leader of the Council or Chairs of Committees. The Panel considered the current list of Coventry's

SRAs, both in relation to the amounts paid and the relative value attributed to different positions.

13. Comparisons with other authorities indicate that, whilst some of Coventry's allowances are on the low side, they are not so low as to fall outside what may be considered the 'normal range' of allowances for similar authority types across the country. [see Appendix 1] Consequently the Panel makes no recommendations to change the remuneration levels of the majority of SRAs: the Leader, Deputy Leader, Cabinet Members, Chairs of Scrutiny Boards and Chairs and Deputy Chairs of the Scrutiny Co-ordination, Planning, Licensing and Audit Committees.
14. The Panel also endorses the existing policy of restricting members to receiving one SRA only.
15. What became apparent to the Panel during the review was the lack of formal, detailed, role descriptions and person specifications available for the posts which attract SRAs, which would allow a more objective analysis of them, individually and in relation to each other. Nevertheless, within the terms of this Panel's limited review some issues were identified which it is believed could and should be addressed now. These are dealt with below.

(i) Members on Fostering Panel and Adoption Panel

16. The Panel was specifically asked to consider the case for SRAs for the elected members appointed to sit on the authority's Fostering Panel and Adoption Panel. These are multi agency/professional groups on which the elected members represent the City Council in its 'corporate parent' role. The level of detail presented on these positions was one of the factors which determined the Panel's view on the lack of sufficient information about existing SRAs.
17. An IRP has to be satisfied that any particular role is significantly above and beyond what might be considered to be reasonably part of a commitment to council work acknowledged within the Basic Allowance. This means considerations not just of time and effort but of complexity and responsibility.
18. From the information presented the Panel has no doubt about the heavy workload and time commitment demanded from involvement in the Fostering and Adoption Panels' activities, which is in addition to the usual activities of a councillor and which include:-
 - approximately 30 meetings a year
 - significant amounts of preparatory work for each meeting
 - sensitive and complex issues
 - difficult decisions with serious consequences to children and families

19. The IRP's conclusion is that, because of the complexity and sensitivity of the work of these panels and the impact their decisions have on the lives of children and adults, the elected members on them do have a unique and special role which merit SRAs. In determining the level of allowance these factors have to be balanced with the fact that these panels very much are team efforts and are not chaired by the elected members; they have independent chairs.
20. Not every authority with social services functions pays SRAs for these roles but a number of others do. With few exceptions those SRAs are relatively low in the SRA hierarchies. [see benchmarking information at Appendix 2] The proposal for Coventry City Council, within the existing SRA structure, is to pay SRAs of £2,578 ie at band 6 level.

(ii) Deputy Chairs

21. The outstanding issue for the Panel in reviewing the existing SRA structure is the position of Deputy Chairs. These positions are the most difficult to justify in respect of the required consideration of 'significance' in relation to time commitment and responsibility. Deputy or Vice-Chair positions do not uniformly attract SRAs in other authorities and, increasingly, these positions are subject to more critical review as allowance schemes are refined in the light of experience and financial pressures.
22. The evidence available to the Panel suggests that, whilst there may be some justification for SRAs for the Deputy Chairs of the Planning, Licensing, Audit and Scrutiny Co-ordination Committees because of the complexity and/or specialist training requirements, there is a diminished case for the Deputy Chairs of the Scrutiny Boards. There is little evidence of additional demands such as attending briefings or training. Chairing meetings in the absence of the Chair is generally rare. This Panel recommends, in the current SRA structure, that the SRAs for Deputy Chairs of Scrutiny Boards be reduced from £2,578 to £1,000.
23. At this stage the Panel has refrained from proposing the abolition of these SRAs as there remains something in the argument that they can be justified to some degree as providing development posts as part of a succession planning strategy. The Panel would however ask the Council to formalise this in its member development scheme.
24. A more general concern for the Panel is that all Deputy Chair positions should be analysed in more depth, and should be a particular focus for a further, more detailed, IRP review of SRAs, to be conducted after the forthcoming issue of an elected mayor for Coventry has been determined.

(iii) Member Responsible for Standards/Chair of Standards Committee

25. Since Coventry's SRA structure was set up the standards regime for local government has changed significantly. Under a national scheme all local authorities have been obliged to appoint Standards Committees with a high

proportion of independent members and, importantly, with an independent member as Chair. It is this body which has responsibility for promoting ethical behaviour and policing the authority's code of conduct. The Member Responsible for Standards has little more than a liaison role in relation to complaints against councillors. Few other authorities now have a similar SRA as the benchmarking information at Appendix 1 reflects.

26. The Panel has concluded that the SRA for the Member Responsible for Standards cannot currently be justified. Accordingly the Panel believes that, under the existing arrangements, it is appropriate that the SRA for the Member responsible for Standards, set at £2,578, be abolished.
27. As a corollary the Panel would recommend that the co-opted independent member appointed as Chair of the authority's Standards Committee should be allocated a responsibility allowance. This is supported by the Guidance to the 2003 Regulations which states that *"Where either a co-opted or appointed member is appointed chair of the committee on which they are co-opted or appointed, the co-optees' allowance they receive must be of an amount no less than the equivalent special responsibility allowances being made available to chairs of equivalent committees of the council."*
28. The Panel does not see an SRA of an equivalent committee within the council structure but it proposes a responsibility allowance of £1,000 for the Chair of the Standards Committee on the basis that, whilst the volume of work is not usually demanding in volume (although it is variable) it is a quasi judicial function with associated complexity and sensitivities.
29. The Panel is aware, however, that there may be further changes to the arrangements for the promotion/enforcement of ethical standards at local level arising out of the Localism Act 2011. In the event that changes at Coventry CC result in an elected member replacing the independent member as chair of an equivalent body to the Standards Committee, then the Panel view is that an SRA of £1,000 would still be the appropriate amount for that elected member.

(iv) Leader of the Principal Opposition Group

30. The Panel believes that the current SRA for the Leader of the Principal Opposition Group, which at £3,860 is currently the lowest SRA other than for Deputy Chairs, may be undervalued. This was also the view of previous Coventry IRPs and is underpinned by comparisons with other authorities [see Appendix 1]. The importance of political challenge remains a cornerstone of UK democracy and may need to be better acknowledged within the Coventry SRA scheme.
31. Having said that the Panel is aware of the considerable disagreements over the years within the Council over this SRA. In the circumstances the Panel is not making any recommendation other than to include this SRA as another particular focus for a future detailed SRAs review.

Recommendations:

- R3 That the SRAs for Leader, Deputy Leader, Cabinet Members, Leader of the Principal Opposition Group, Chairs of Scrutiny Boards and Chairs and Deputy Chairs of the Scrutiny Co-ordination, Planning, Licensing and Audit Committees remain at the existing levels of remuneration.
- R4 That the current SRA for the Lead Member for Standards be discontinued.
- R5 That a responsibility allowance of £1,000 be paid to the Chair of the Standards Committee.
- R6 That, if in the future, an elected member is appointed to lead the authority's arrangements for promoting and policing ethical standards, the SRA for that position should also be set at £1,000.
- R7 That the SRAs for Deputy Chairs of Scrutiny Boards be reduced from £2,578 to £1,000.
- R8 That additional SRAs be approved for elected members appointed to the authority's Fostering Panel and Adoption Panel, these SRAs to be set at £2,578.
- R9 The recommended revised list of SRAs is:-

Special Responsibility Allowances	
Leader of the Council	£23,169
Deputy Leader of the Council	£16,731
Other Cabinet Members (8)	£10,299
Chair of Scrutiny Co-ordination Committee	£10,299
Deputy Chair of Scrutiny Co-ordination Cttee	£2,578
Chairs of Scrutiny Boards (5)	£6,439
Deputy Chairs of Scrutiny Boards (5)	£1,000
Chair of Audit Committee	£6,439
Deputy Chair of Audit Committee	£2,578
Chair of Planning Committee	£6,439
Deputy Chair of Planning Committee	£2,578
Chair of Licensing & Regulatory Committee	£6,439
Deputy Chair of Licensing & Regulatory Cttee	£2,578
Member of Fostering Panel	£2,578
Member of Adoption Panel	£2,578
Leader of Opposition Group	£3,860
Chair of Standards Committee	£1,000

- R10 That the City Council undertake to produce formal job descriptions/person specifications for the roles and responsibilities of elected members, particularly for positions which attract Special Responsibility Allowances.

Co-optees Allowances

32. The Panel believes that the current allowance for co-opted (ie non elected) members on council committees of £466 pa is set at the right level and does not propose any change.

Recommendation:

- R11 That the allowances paid to each co-opted member appointed by the City Council remain at the existing level, currently £466 pa.

Lord Mayor and Deputy Lord Mayor Allowances

33. The Panel has been asked to review the allowances paid to the Lord Mayor and Deputy Lord Mayor. These allowances are not paid under the scheme provided by the 2000 Local Government Act but are classed as civic dignitaries allowances the provision of which is covered in the 1972 Local Government Act.
34. The Panel does support these allowances coming within the IRP remit and published in the Council's allowances scheme although separately identified to the SRA list. This is partly for completeness and transparency and partly because these allowances are 'hybrids' in that the Lord Mayor, whilst primarily engaged in civic duties, retains an important function within the council structure which is the chairing of Council meetings. The Panel has no doubt that, whilst unquantified, an element of the allowance represents the equivalent of an SRA, both for the council role and for the time commitment and demands of the civic role.
35. The Panel discovered that the Lord Mayor and Deputy Lord Mayor's allowances have historically been paid at a set net figure, causing the gross amounts to be variable according to the particular tax and insurance positions of each postholder. For example, the 2010-11 allowance was set at a net rate of £31,613 and due to the personal tax and insurance implications of the then Lord Mayor, the gross figure was calculated at £45,945.
36. No evidence could be traced as to the historical rationale for this approach and a more detailed review of these allowances might be beneficial. This approach is not replicated in the Council's other allowances, which are set at gross amounts ie before tax and National Insurance deductions. The Panel's initial recommendation therefore is that this practice should cease and fixed gross allowances should be paid from now on.
37. Panel members, like many others on the council and in the community, have great respect for the work undertaken by the office of Lord Mayor in promoting the City, in charitable work and in encouraging community identity and social cohesion. They would not wish to see the position diminished.

38. Nevertheless the Lord Mayor's allowance, which for the review the Panel used the 2010-11 gross allowance of £45,945, is a very significant sum. However, as referred to previously, the Lord Mayor has previously not received a Basic Allowance which the Panel believes has led to a distortion in the allowance to compensate for this. As every member, including the member selected as Lord Mayor, is entitled to the Basic Allowance so the Lord Mayor's allowance should be reduced by the equivalent amount.
39. This would give a more realistic estimate of the gross allowance of £33,073, which is to meet the personal costs associated with the role including those of their partner/consort and includes, as the Panel believes, an unquantified element equivalent to an SRA. Even taking into account the personal costs involved in holding office this allowance seems out of step with the Leader's SRA of £23,169.
40. The Panel's view is that the allowance is too high. Comparisons with other authorities support this. [see benchmarking information in Appendix 3] The Coventry mayoral allowance is higher than any other in the West Midlands and higher than any of the other similar sized cities and boroughs around the country that were surveyed, in many instances considerably higher. It is difficult to argue that Coventry's mayoral function and budget operate so differently from all the others as to merit such a high rate.
41. The Panel proposes a reduction of 25% which would produce a revised gross allowance of £24,805. *(For clarity it is to be noted that the revised combined allowances payable to the Lord Mayor, including Basic Allowance, would be £37,677 compared with the single amount of £45,945).*
42. The equivalent Deputy Lord Mayor gross allowance is £12,615. This is considered to be disproportionately high in relation to the proportion of civic duties required of the role of deputising for a relatively small number of engagements (17% of the total No. of engagements in 2010/11). The Panel also proposes a 25% reduction in this allowance, down to £9,461. The Deputy Lord Mayor does receive the Basic Allowance as well.
43. Even with these reductions the Coventry allowances remain amongst the highest in the benchmarking survey of other authorities.

Recommendations:

- R12 That the Lord Mayor and Deputy Lord Mayor allowances be set at gross rate (before tax and National Insurance), in line with how basic allowance and other SRAs are treated.
- R13 That the Lord Mayor's gross allowance be reduced from £45,945 to £24,805 by (i) reducing it by the amount of the Basic Allowance (to be paid to the Lord Mayor separately - see para 11 above) and (ii) by a further 25%.

R14 That the Deputy Lord Mayor's gross allowance of £12,615 be reduced by 25% to £9,461.

Dependent Carers Allowances

44. The Panel is pleased to see that the City Council has in place a scheme for paying additional allowances to meet child and adult care costs. Whilst there has been little demand for this to date it remains an important feature of the allowances scheme to help attract people from all sections of the community to become councillors and retain them in that role. The City Council is asked to increase promotion of the scheme, particularly to prospective candidates. It is considered likely that there will be a greater take up of these allowances in the future.
45. The Panel is concerned therefore that there is no specific budget provision for dependent carers' allowances and would wish to see the Council's commitment underpinned by a discrete financial allocation. A budget of £2,000 is recommended. Such sum could be met from savings in other allowances identified by the Panel.

Recommendations:

- R15 That the City Council undertake greater promotion of the Dependent Carers' Allowance Scheme, particularly in relation to the objective of encouraging the broadest representation of society on the Council.
- R16 That, notwithstanding the recent low level of claims for carers' allowances, specific budget provision, proposed at £2,000 pa, be made to underpin the Council's commitment to this scheme.

Annual Adjustment of Allowances

46. The existing indexing arrangement is for allowances to have the same annual percentage increase as the increase in pay agreed for local government employees, (pegged to spinal column point 49 of the NJC Scheme). The Panel considers this to be a reasonable basis for indexing and avoids potential inequity between indexing members and officers remuneration.
47. The City Council is recommended to continue with this arrangement for a further period of four years and that this should apply to Basic, Special Responsibility, Co-optees and Lord Mayor and Deputy Lord Mayor allowances.
48. However, the previous indexing arrangements expired on 1 April 2011. Although there were no consequences arising as local government salaries (and member allowances) were frozen in 2011/12, the indexing arrangements now recommended have to take effect from 1 April 2011. They should therefore be reviewed again by no later than April 2015.

Recommendation:

R17 That Basic, Special Responsibility, Co-optees, Lord Mayor and Deputy Lord Mayor allowances, be increased each year by the percentage increase in pay agreed for local government employees (pegged to spinal column point 49 of the NJC Scheme); this indexing to be effective from 1 April 2011 and expire on 31 March 2015.

Pick and Mix' Stationery Allowance

49. City councillors are allowed up to £150 pa for items of stationery etc provided through the authority – known as the 'Pick and Mix' allowance. The Panel can find no evidence of such provision in other authorities and believes this is an anomaly and should be discontinued. The Basic Allowance is intended to “.....cover incidental costs such as the use of their homes”. The Panel believes this logically includes expenses such as stationery and recommends abolition of this allowance.
50. It is understood that a number of members are attached to the Pick and Mix scheme but usage records indicate that most members do not spend the full amount. The operation of this scheme does not merit the officer time required to administer it.
51. Should the Council decide not to abolish the scheme the Panel would at least wish to see the discontinuance of the 'custom and practice' additional pick and mix allowances provided for political group officers (£100 extra each) and the Leader (£350 extra). If the Council wished to continue with this additional provision a formal amendment to the scheme would be required as currently it is not included.
52. The savings arising from discontinuing this scheme would be a reduction of £9,500 in the budget allocations (although this traditionally has not been fully spent). This is a modest amount but would nevertheless represent a valuable contribution to the budget reductions the authority is currently having to make.

Recommendations:

R18 That the 'Pick and Mix' allowance of £150 for each elected member for stationery, equipment etc be abolished.

R19 In the event of the City Council deciding to continue this scheme the 'custom and practice', but currently unauthorised, additional allowances for Group Officers and the Leader be discontinued.

Telephone Allowances

53. The provision of telephones for elected members to support them in their roles is, in the Panel's eyes, currently unnecessarily complex and time consuming to administer. Provision over time has taken on board changing technologies so that it includes dedicated landlines, mobile phones and, for senior members, Blackberrys (ie with internet access). Each member

currently has an allowance of up to £610 pa for rental and calls charges. Blackberry costs are not included in this as this is classed as IT provision.

54. Telephone and internet technology has changed rapidly in recent years and the Panel strongly believes that a uniform provision of 'smart' phones, under an authority negotiated contract (ie the authority pays directly for the contract with no payments to members), to every member is both most sensible for administration purposes and likely cost effective (notwithstanding that the Panel did not have smart phone cost options available). Whilst the costs of administering the current arrangements are not included in members' allowances budgets the Panel is confident that there will be reduced administration costs.
55. This course of action is strongly recommended and should involve the discontinuance of all other telephone provision and associated allowances to members. However it will be for the Council to decide how best to implement these arrangements.

Recommendations:

R20 That the City Council introduce a single mode of provision of 'smart' phones for all members, under authority negotiated and financed contracts.

R21 That all other modes of telephone provision and associated allowances paid to members be discontinued at the earliest opportunity.

Travel and Subsistence

56. The City Council currently provides for members claiming travel and subsistence expenses but the rates were last set in 2003 at a national level by the then Secretary of State. From 2003 travel and subsistence allowances became locally determined and within the remit of IRPs to make recommendations on. The City Council's rates therefore relate to a now defunct provision.
57. Furthermore there is no Coventry CC scheme which sets out the travel policies, parameters of eligibility or details of claim and reimbursement procedures. This is problematic and can lead to interpretation issues and potentially to variable or possibly unequal provision.
58. The Panel recommends as a starting point that the travel and subsistence rates applicable to City Council officers (still set nationally) should also apply to elected members. This is a common approach in many other authorities and does provide some consistency and even handedness within the authority.
59. In addition the City Council is recommended to adopt a fully described members' travel and subsistence scheme. The Panel has looked at a number of such schemes in its benchmarking work and, utilising elements of those, the officers' scheme and the 2003 Regulations, has drafted an

outline scheme for the City Council which is recommended for adoption. This is attached as Appendix 4 to this report.

60. An important aspect of this scheme is the exclusion of travel and subsistence entitlement for the standard duties of councillors for which the Basic Allowance is deemed to cover such expenses. For these purposes the definition of standard duties is taken as dealings with constituents and council officers, attendance at council meetings, political group meetings, and meetings of other community organisations. There is scope however for the authority to refine the list of approved duties.
61. In summary the principles of this scheme include:-
- Claims only for approved duties
 - Generally no claims for travel and subsistence within the City boundaries in relation to the standard duties of councillors– these costs considered to be covered within the Basic Allowance
 - An approach of minimising travel costs as far as is practical
 - Maximum subsistence rates only to be exceeded where approval obtained that costs are unavoidable or justifiable
 - All claims to be submitted with receipts within three months or forfeited

Recommendations:

R22 That the rates of travel and subsistence allowances paid to elected members be the same as those paid to officers of the authority and revised annually in line with those allowances.

R23 That the attached outline scheme of travel and subsistence allowances (Appendix 4) be adopted.

Financial Implications

62. A summary of the formal recommendations of the Coventry IRP are set out overpage. If all the principal recommendations are approved the Panel has calculated that this will result in a net budget reduction of £24,722 in elected members' allowances and expenses - around 2.3% of the budget provision. [a breakdown of how this figure is arrived at is set out in Appendix 5]. Further savings might be made from the revised telephone provision and travel and subsistence schemes but for the purposes of this review the Panel has assumed cost neutrality for these revisions.
63. These savings represent a modest but nonetheless valuable collective contribution by elected members to the budget savings required by the authority in a time of austerity in public finances.

Review Implementation

64. The recommendations of the IRP are not to be considered as a single 'all or nothing' decision by the City Council. Although some issues are linked most can be dealt with as individual decisions and the City Council is asked to

deal with them on this basis. The Council may reject any of the IRP's proposals but they must have regard to the implications of such decisions including in relation to the overall financial outcome.

65. Revised allowances will apply from the Annual Meeting of the council in May 2012, apart from index linking which should next be applied from 1 April 2012.
66. Recommendations that are approved will need to be incorporated in a revised scheme of allowances and expenses to be published within the authority's constitution and elsewhere as appropriate.

General Conclusions

67. The Panel supports the provision of reasonable remuneration to councillors for their often demanding roles and sense of public duty. The public generally has a limited awareness of what the job of a councillor is and what demands are placed on them. Allowances should provide some level of incentive to attract a broad cross section of society to consider standing for election. The quality and diversity of our elected representatives is an important matter.
68. The Panel is nevertheless concerned with the lack of supportive information describing and evidencing the requirements and demands of the different roles councillors undertake, particularly those more senior positions which attract Special Responsibility Allowances. It is not an unreasonable expectation that the basis for councillors' remuneration is more prescribed and transparent.
69. A recurring issue throughout this IRP review was the limitations on the information available. This Panel is convinced that the work of the IRP would be significantly aided if job descriptions were available giving details of duties, and responsibilities and person specifications setting out the demands and expectations on members. However there are no such authority agreed descriptions available and the City Council is urged to agree to produce these, which would aid future IRPs to better analyse the allowances structure.
70. Following on from the recommendation for job descriptions the Panel also recommends that a full review of SRAs be undertaken by a future IRP to validate/refine the SRA structure. Two specific additional reasons for this are:-
 - the current SRA amounts and the SRA hierarchy were basically set over a decade ago and have not been satisfactorily reviewed in depth since
 - currently over half of Coventry CC elected members receive an SRA (including changes proposed in this report = 59%) and the Guidance to the 2003 Regulations advises that *"if the majority of members receive an SRA the local electorate might rightly question whether this was justified"*.

71. Such a review would most appropriately be undertaken following the determination of whether or not Coventry is to have an elected mayor.

Recommendation:

- R24 That, following the determination of the issue of whether or not Coventry has an elected mayor, a full, in depth, review of the Coventry City SRA structure and allowance levels be undertaken by a future IRP.

E. Summary of all recommendations

Basic Allowance

- R1 That the Basic Allowance remain at the existing level of remuneration, currently £12,872 pa.
- R2 That the Basic Allowance be paid to every elected member ie including the member elected as Lord Mayor.

Special Responsibility Allowances (SRAs)

- R3 That the SRAs for Leader, Deputy Leader, Cabinet Members, Leader of the Principal Opposition Group, Chairs of Scrutiny Boards and Chairs and Deputy Chairs of the Scrutiny Co-ordination, Planning, Licensing and Audit Committees remain at the existing levels of remuneration.
- R4 That the current SRA for the Lead Member for Standards be discontinued.
- R5 That a responsibility allowance of £1,000 be paid to the Chair of the Standards Committee.
- R6 That, if in the future, an elected member is appointed to lead the authority's arrangements for promoting and policing ethical standards, the SRA for that position should also be set at £1,000.
- R7 That the SRAs for Deputy Chairs of Scrutiny Boards be reduced from £2,578 to £1,000.
- R8 That additional SRAs be approved for elected members appointed to the authority's Fostering Panel and Adoption Panel, these SRAs to be set at £2,578.

R9 The recommended revised list of SRAs is:-

Special Responsibility Allowances	
Leader of the Council	£23,169
Deputy Leader of the Council	£16,731
Other Cabinet Members (8)	£10,299
Chair of Scrutiny Co-ordination Committee	£10,299
Deputy Chair of Scrutiny Co-ordination Cttee	£2,578
Chairs of Scrutiny Boards (5)	£6,439
Deputy Chairs of Scrutiny Boards (5)	£1,000
Chair of Audit Committee	£6,439
Deputy Chair of Audit Committee	£2,578
Chair of Planning Committee	£6,439
Deputy Chair of Planning Committee	£2,578
Chair of Licensing & Regulatory Committee	£6,439
Deputy Chair of Licensing & Regulatory Cttee	£2,578
Member of Fostering Panel	£2,578
Member of Adoption Panel	£2,578
Leader of Opposition Group	£3,860
Chair of Standards Committee	£1,000

R10 That the City Council undertake to produce formal job descriptions of the roles and responsibilities of elected members, particularly for positions which attract Special Responsibility Allowances.

Co-optees Allowances

R11 That the allowances paid to each co-opted member appointed by the City Council remain at the existing level, currently £466 pa.

Lord Mayor and Deputy Lord Mayor Allowances

R12 That the Lord Mayor and Deputy Lord Mayor allowances be set at gross rate (before tax and National Insurance), in line with how basic allowance and other SRAs are treated.

R13 That the Lord Mayor's gross allowance be reduced from £45,945 to £24,805 by (i) reducing it by the amount of the Basic Allowance (to be paid to the Lord Mayor separately - see para 11 above) and (ii) by a further 25%.

R14 That the Deputy Lord Mayor's gross allowance of £12,615 be reduced by 25% to £9,461.

Dependent Carers Allowances

R15 That the City Council undertake greater promotion of the Dependent Carers' Allowance Scheme, particularly in relation to the objective of encouraging the broadest representation of society on the Council.

R16 That, notwithstanding the recent low level of claims for carers' allowances, specific budget provision, proposed at £2,000 pa, be made to underpin the Council's commitment to this scheme.

Annual Adjustment of Allowances

R17 That Basic, Special Responsibility, Co-optees, Lord Mayor and Deputy Lord Mayor allowances, be increased each year by the percentage increase in pay agreed for local government employees, (pegged to spinal column point 49 of the NJC Scheme); this indexing to be effective from 1 April 2011 and expire on 31 March 2015.

Expenses

R18 That the 'Pick and Mix' allowance of £150 for each elected member for stationery, equipment etc be abolished.

R19 In the event of the City Council deciding to continue this scheme the 'custom and practice', but currently unauthorised, additional allowances for Group Officers and the Leader be discontinued.

R20 That the Council introduce a single mode of provision of 'smart' phones for all members under authority negotiated and financed contracts.

R21 That all other modes of telephone provision and associated allowances paid to members be discontinued at the earliest opportunity.

R22 That the rates of travel and subsistence allowances paid to elected members be the same as those paid to officers of the authority and revised annually in line with those allowances.

R23 That the attached outline scheme of travel and subsistence allowances (Appendix 4) be adopted.

Further Review of SRAs

R24 That, following the determination of the issue of whether or not Coventry has an elected mayor, a full, in depth, review of the Coventry City SRA structure and allowance levels be undertaken by a future IRP.

Bruce Undy
Chair, Coventry IRP
February 2012

Coventry CC Members Allowances Review – Comparative Data

1. LGA 2008 Survey

	Basic Allowance £	Leader £	Deputy Leader £	Cabinet/ Executive £	Chair Overview and Scrutiny £	Chair Planning £	Chair Licensing £	Opposition Leader £
<i>Average Allowances</i>								
London Borough	9,739	37,486	25,456	22,028	14,358	12,137	9,484	14,835
Met District	9,766	26,405	16,080	12,505	8,843	7,845	7,207	10,020
Shire County	9,978	27,290	18,395	15,518	9,611	6,797	5,886	11,206
Shire District	4,194	11,940	6,565	6,083	3,946	4,077	2,972	3,260
Unitary	8,076	22,477	15,073	11,613	7,553	6,857	5,562	7,291
WM Region	5,809	14,783	9,176	7,825	5,982	5,471	3,959	5,234
England	6,099	17,753	11,268	9,710	6,159	5,623	4,334	6,182
Coventry	12,104	21,786	15,732	9,684	9,684	6,050	6,050	3,630

Appendix 1 continued

Coventry CC Members Allowances Review – Comparative Data

2. Sample Authorities – 2010/2011 Data

	Basic Allowance £	Leader £	Deputy Leader £	Cabinet/ Executive £	Chair Scrutiny Co-ordination £	Dep./Chair Scrutiny Co-ordination £	Chair Scrutiny Board £	Dep. Chair Scrutiny Board £	Chair Planning £	Dep. Chair Planning £
<i>SRA Band in brackets</i>										
Coventry	12,872	23,169 (1)	16,731 (2)	10,299 (3)	10,299 (3)	2,578 (6)	6,439 (4)	2,578 (6)	6,439 (4)	2,578 (6)
WM Met Councils										
Birmingham	16,267	55,947 (1)	41,960 (2)	31,330 (3)	21,993 (4)	N/A	14,099 (6)	N/A	16,448 (5)	N/A
Dudley	9,300	23,250 (1)	11,625 (2)	6,975 (3)	N/A	N/A	4,650 (4)	1,550 (6)	6,975 (3)	2,325 (5)
Sandwell	10,515	26,278 (1)	23,650 (2)	15,768 (3)	15,768 (3)	N/A	8,751 (5)	2,196 (8)	13,139 (4)	5,913 (6)
Solihull	7,688	19,200 (1)	9,216 (2)	7,688 (3)	N/A	N/A	6,144 (4)	N/A	6,144 (4)	3,072 (5)
Walsall	10,275	20,550 (1)	8,220 (3)	8,220 (3)	N/A	N/A	8,220 (3)	N/A	7,706 (4)	N/A
Wolverhampton	8,980	25,320 (1)	21,100 (2)	16,880 (3)	16,880 (3)	5,570 (5)	12,660 (4)	5,570 (5)	16,880 (3)	5,570 (5)
Other Comparator Unitaries										
Bromley	10,872	30,600 (1)	N/A	20,400 (2)	N/A	N/A	7,140 (5)	N/A	9,180 (3)	1,971 (8)
Wigan	11,682	40,943 (1)	21,056 (2)	15,792 (3)	7,018 (5)	2,127 (10)	7,018 (5)	2,127(10)	10,528 (4)	3,456 (9)
Newcastle	9,210	17,420 (1)	8,710 (2)	6,533 (3)	4,355 (4)	4,355 (4)	4,355 (4)	2,178 (5)	4,355 (4)	2,178 (5)
Wakefield	10,985	33,519 (1)	17,534 (2)	13,168 (3)	N/A	N/A	8,802 (4)	N/A	8,802 (4)	2,957 (8)
Nottingham	11,582	34,744(1)	23,162 (2)	17,951 (3)	14,476 (4)	N/A	8,686 (5)	N/A	5,791 (6)	N/A
South Gloucestershire	10,835	22,754(1)	N/A	17,336 (2)	N/A	N/A	8,126 (3)	N/A	3,251(5)	N/A

Coventry CC Members Allowances Review – Comparative Data

2. Sample Authorities - 2010/2011 Data (Cont.)

	Chair Licensing £	Dep. Chair Licensing £	Chair Audit £	Dep. Chair Audit £	Member for Standards £	Leader of Main Opposition Group £
<i>SRA Band in brackets</i>						
Coventry	6,439 (4)	2,578 (6)	6,439 (4)	2,578 (6)	2,578 (6)	3,860 (5)
Birmingham	14,099 (6)	N/A	6,288 (9)	N/A	1,000 (16)	14,099 (6)
Dudley	4,650 (4)	1,550 (6)	4,650 (4)	1,550 (6)	N/A	4,650 (4)
Sandwell	8,751 (5)	5,256 (6)	8,751 (5)	N/A	N/A	8,751 (5)
Solihull	3,072 (5)	N/A	N/A	N/A	N/A	7,688 (3)
Walsall	7,706 (3)	N/A	5,137 (4)	N/A	N/A	8,220 (2)
Wolverhampton	12,660 (4)	4,220 (6)	12,660 (4)	4,220 (6)	N/A	16,880 (3)
Bromley	9,180 (3)	1,971 (8)	1,971 (8)	N/A	N/A	7,577 (4)
Wigan	7,018 (5)	2,127 (10)	3,509 (8)	1,170 (11)	7,018 (5)	5,158 (6)
Newcastle	4,355 (4)	2,178 (5)	N/A	2,718 (5)	2,178 (5)	4,355 (4)
Wakefield	8,277 (6)	N/A	8,482 (5)	N/A	8,277 (6)	6,654 (7)
Nottingham	5,791 (6)	N/A	5,791 (6)	N/A	N/A	8,686 (5)
South Gloucestershire	1,084 (7)	N/A	N/A	N/A	N/A	17,336 (2)

Coventry CC Members Allowances Review – Comparative Data

SRAs – Adoption and Fostering Panels

LGA Survey 2008

Authority	SRA £	Band
Brent	3,055	8
Islington	3,900	7
Solihull	1,400	7
Gloucestershire	11,703	4
West Sussex	3,090	8
Bath & NE Somerset	3,425	8
Derby	1,802	7

Appendix 2 continued

SRAs for Fostering/Adoption Panels – Extended Benchmarking Survey

2011/12 amount Total	Fostering rep	Adoption rep	Permanency rep	SRA Band	
6340.0	3170.0	3170.0		8	<u>London Boroughs</u> Brent London Borough Council
1340.0	670.0	670.0		8	Bromley London Borough Council
8852.0		8852.0		7	Croydon London Borough Council
6183.0		6183.0		6	Hammersmith and Fulham London Borough Council
12000.0	12000.0			5	Hillingdon London Borough Council
6000.0	3000.0	3000.0		7	Islington London Borough Council
5613.0	2806.5	2806.5		6	Lambeth London Borough Council
2093.3	2093.3			6	Merton London Borough Council
4400.0	1466.7	1466.7	1466.7	6	Wandsworth Borough Council
6000.0	3000.0	3000.0		7	Westminster City Council
					<u>West Midlands Metropolitan Authorities</u>
5256.0				6	Sandwell Metropolitan Borough Council
1536.0	1536.0	1536.0		7	Solihull Metropolitan Borough Council
					<u>Other Authorities</u>
11703.0	11703.0			4	Gloucestershire County Council
3129.0	3129.0			8	West Sussex County Council
7110.0	3555.0	3555.0		8	Bath and North East Somerset Council
3,741.2	1870.6	1870.6		7	Derby City Council

Note: This list does not purport to show every authority which pays SRAs for these positions

Appendix 3

Coventry CC Members Allowances Review – Comparative Data

Mayoral Allowances

****Note: Coventry CC does not currently give a Basic Allowance to the Lord Mayor, during his/her year of office, in addition to the mayoral allowance. The other authorities set out below do. Therefore, to provide a realistic comparison, the Coventry allowance in this table is net of the amount of the City's Basic Allowance. The Deputy Lord Mayor however does get a Basic Allowance**

Authority	Mayor Allowance £	Deputy Mayor Allowance £
Coventry	**33,073	12,615
Birmingham	29,945	9,046
Sandwell	24,521	9,760
Solihull	14,450	940
Walsall	18,751	5,653
Wolverhampton	20,461	4,213
Nottingham	24,900	3,475
Newcastle	13,065	-
Leicester	16,039	4,915
Derby	9,976	-
Sunderland	17,250	3,827
Stoke-on-Trent	8,250	2,750
Wakefield	14,599	5,731
Brent	7,616	5,606
Ealing	15,876	-
Lambeth	15,454	5,319

Appendix 4**Coventry City Council
Outline Members' Travel and Subsistence Allowances Scheme**

1. Members (including Co-opted Members) shall not be entitled to receive travel and subsistence payments for duties carried out within the city boundary which are considered standard activities relating to the role of a councillor. The Basic Allowance is deemed to include an element to meet such costs. Such duties include:
 - All meetings of the Council, the Executive, Committees, Sub-Committees and Panels
 - Briefings with officers
 - Political group meetings
 - Constituency work including meetings with community groups
2. Activities which qualify for travel and subsistence payments to Members (including Co-opted Members) include:
 - Meetings of a Joint Committee or body of which the authority is a member
 - Meetings of a local authority association of which the authority is a member
 - Meetings of some other body to which the authority makes appointments or nominations
 - Authorised conferences, seminars or training and development events
 - Any other duties approved by the authority in connection with discharging the functions of the authority

Travel Allowances

3. Wherever practicable public transport should be used, the costs of which shall be paid directly by the authority or reimbursed to members.
4. Standard rail fares shall apply.
5. Where the use of public transport is not practicable, the cost of travel will be reimbursed on the same rates of casual user car/motor cycle/cycle allowances payable to officers of the authority.
6. Costs of taxi fares (including reasonable gratuity), tube fares, car parking and toll charges will be reimbursed where necessarily incurred.

Accommodation and Subsistence Allowances

7. The costs of accommodation and/or meals arising in relation to approved duties shall be paid directly by the authority or reimbursed to members.
8. The accommodation and subsistence rates shall be the same as those applicable to officers of the authority.
9. These rates shall be treated as maximums but may, with official approval, be exceeded where:
 - (a) the costs associated with an event eg conference are fixed
 - (b) it is reasonable in the circumstances of the event

Claims and Payments

10. Nominated officers shall be authorised to approve expenditure outside the normal travel and subsistence rates, and generally adjudicate on claims, where required.

11. Travel and subsistence claims must be:

- for actual expenditure
- submitted in a form determined by the authority
- accompanied by evidence of expenditure with receipts

12. Claims must be made within three months of the date of the expenditure or else forfeited unless exceptional circumstances can be justified as to why this timescale could not be achieved.

Appendix 5

Coventry IRP Review 2012

Summary of Financial Outcomes of IRP Recommendations

<u>Reductions in Allowances</u>	£	£
Discontinuation of SRA for Member Responsible for Standards	2,578	
Reduction in SRAs for Deputy Chairs of Scrutiny Boards (5x £1,578)	7,890	
Reduction in Lord Mayor's Allowance	21,140	
Reduction in Deputy Lord Mayor's Allowance	3,154	
Reduction in authority NI payments for member Allowances	1,489	
Discontinuation of 'Pick and Mix Allowance	<u>9,500</u>	45,751
<u>Increases in Allowances</u>		
Payment of Basic Allowance to Lord Mayor	12,872	
SRA for Chair of Standards Committee	1,000	
SRAs for members on the Fostering and Adoption Panels (2x£2,578)	5,156	
Budget provision for Dependent Carers Allowances	<u>2,000</u>	<u>21,028</u>
Net reduction in allowances		<u>24,723</u>
Total Budget allocations for member allowances and expenses (Including Lord Mayor and Deputy Lord Mayor Allowances)		1,063,493
Net reductions as %age of total allowances		2.32%

Supplementary Report of the Coventry City Council Independent Remuneration Panel - June 2012

Introduction

1. The current Coventry Independent Remuneration Panel (IRP) was constituted in November 2011 to review the allowances payable to City Councillors. The Panel concluded its review in February 2012 when its report and recommendations (reproduced in full as drafted and presented together with this supplementary report) were submitted to the authority.
2. Consideration of the 'February Report' by the Council was however deferred pending the holding of the referendum in May to decide if Coventry should have an elected Mayor. The February Report includes consideration of the remuneration of the existing, principally ceremonial, Lord Mayor, so it was decided to hold back the report to avoid the possibility of (unintentionally) influencing or confusing the debate about elected mayors.
3. The referendum has now been held and the electorate of Coventry voted against having an elected Mayor. The February Report now falls to be considered by the City Council.
4. However, decisions by the City Council on its member structure made since the Panel concluded its deliberations, whilst not affecting any matter of principle set out in the February Report, do impact on some of its details and the Panel believes these need to be acknowledged and reconciled by way of this supplemental report. The specific matters are set out below.

Ethics Committee

5. The Panel report addressed Special Responsibility Allowance (SRA) issues around the then standards regime (see paragraphs 25 – 29 of the February Report) and recommended a responsibility allowance of £1,000 pa for the (co-opted member) Chair of the Standards Committee. However, the Panel also anticipated potential changes to the standards regime arising out of the Localism Act 2011, recommending that the same level of allowance apply if an elected member was subsequently appointed to lead the authority's standards promotion/policing role.
6. This has now been implemented and the former Standards Committee has been replaced by an Ethics Committee of elected members with an elected member Chair. Recommendations of the February Report therefore require updating.

Consequential Variations to the February Report Recommendations

7. (a) Recommendation R5 in the February Report should now read: "R5 That a responsibility allowance of £1,000 be paid to the Chair of the Ethics Committee."

(b) Recommendation R6 in the February Report should be deleted.

Scrutiny Boards

8. The member structure considered by the Panel included five Scrutiny Boards. The City Council has subsequently determined that six Scrutiny Boards represents a more effective basis for scrutinising executive functions.
9. The increase to six Scrutiny Boards does not affect the decisions of the Panel in relation to the level of SRAs for Chairs and Deputy Chairs of Scrutiny Boards. It does however affect the financial outcomes of the allowances review.
10. The IRP review projected a net budget reduction of £24,722 in elected members' allowances and expenses - around 2.3% of the budget provision (see para 62 of the February Report). An additional Scrutiny Board results in additional SRAs for the Chair and Deputy Chair of that Board, totalling £7,439, which reduces the projected net budget reduction arising from the IRP's recommendations to £17,283 which is around 1.6% of budget provision.
11. It is to be noted that, even taking on board the additional SRAs for Fostering and Adoption Panels as recommended by the Panel in February, and the additional Scrutiny SRAs created as a consequence of structural changes made by the Council since then, the review recommendations if implemented would still present a useful saving to the authority and not an additional cost.

Consequential Variations to the February Report Recommendations

12. The definitive list of SRAs as set out in the schedule in R9 of the February Report would need to be updated to reflect the establishment of the Ethics Committee and the additional Scrutiny Board. The list should now read as follows, with the changes highlighted:-

“ R9 The recommended revised list of SRAs is:-

Special Responsibility Allowances	
Leader of the Council	£23,169
Deputy Leader of the Council	£16,731
Other Cabinet Members (8)	£10,299
Chair of Scrutiny Co-ordination Committee	£10,299
Deputy Chair of Scrutiny Co-ordination Cttee	£2,578
Chairs of Scrutiny Boards (6)	£6,439
Deputy Chairs of Scrutiny Boards (6)	£1,000
Chair of Audit Committee	£6,439
Deputy Chair of Audit Committee	£2,578
Chair of Planning Committee	£6,439
Deputy Chair of Planning Committee	£2,578
Chair of Licensing & Regulatory Committee	£6,439
Deputy Chair of Licensing & Regulatory Cttee	£2,578

Member of Fostering Panel	£2,578
Member of Adoption Panel	£2,578
Leader of Opposition Group	£3,860
Chair of Ethics Committee	£1,000

Indexing of Allowances

13. The Panel agreed that the annual adjustment of allowances should continue to be by a percentage increase the same as pay awards for local government employees. Because the previous indexing period expired in 2011 the Panel recommended that the continuation should run from 2011. However the City Council's legal department has now indicated it is possible to commence the new indexing period from 2012, which the Panel supports.

Consequential Variation to the February Report Recommendations

14. Recommendation R17 should now read:- "R17 That Basic, Special Responsibility, Co-optees, Lord Mayor and Deputy Lord Mayor allowances, be increased each year by the percentage increase in pay agreed for local government employees (pegged to spinal column point 49 of the NJC Scheme); this indexing to be effective from 1 April 2012 and expire on 31 March 2016."

Bruce Undy
Chair, Coventry IRP
June 2012