



---

**To: The Business, Economy and Enterprise Scrutiny Board (3) Date 16<sup>th</sup> March 2016**

**Subject: Feedback on the Local Plan and City Centre Area Action Plan Periods of Public Consultation (January 18<sup>th</sup> 2016 – February 29<sup>th</sup> 2016)**

---

## **1 Purpose of the Note**

1.1 The purpose of this note is to provide the members of Scrutiny Board 3 with a summary of the feedback and consultation responses received to the statutory period of public consultation between January 18<sup>th</sup> and February 29<sup>th</sup> 2016, in so far as they relate to the Draft City Centre Area Action Plan (AAP) – Publication Draft (2016) and the Draft Local Plan – Publication Draft (2016).

1.2 This paper responds to recommendation 4 of the City Centre AAP report and recommendation 5 of the Local Plan report endorsed by Cabinet and Council at their respective meetings on the 12<sup>th</sup> January 2016. For the avoidance of doubt, the recommendations read as follows:

“Delegate authority to the Executive Director of Place, in consultation with the Cabinet Member for Business, Enterprise and Employment, the Chair of Scrutiny Board 3 and the Chair of Planning Committee, to take full account of the responses received to the statutory period of public engagement, propose minor amendments to the City Centre Area Action Plan / Local Plan (*replace as appropriate*) (where this is necessary to correct any errors and aid clarity) and submit the plan to the Secretary of State for a period of Public Examination”.

This report has been presented and supported by those named in this recommendation as follows:

- Executive Director of Place – 4<sup>th</sup> March 2016
- Cabinet Member for Business, Enterprise and Employment – 4<sup>th</sup> March 2016

It is to be presented initially to the Chair of Planning Committee on the 10<sup>th</sup> March 2016 and is presented to the Chair of Scrutiny Board 3 as part of this meeting.

## **2 Recommendations**

2.1 The Business, Economy and Enterprise Scrutiny Board (3) are recommended to:

- 1) Consider the content of the briefing note and its Appendices; and
- 2) Endorse the submission of all representations and summary notes of public meetings, ward forums and drop in sessions and the schedule of proposed

minor changes to the Secretary of State for further consideration through Public Examination of the city's draft Local Plan and City Centre Area Action Plan.

### **3 Information/Background**

- 3.1 The period of public engagement began on Monday 18<sup>th</sup> January and finished on the 29<sup>th</sup> February 2016. The Plans did however become public on the 4<sup>th</sup> January in advance of them being considered by Cabinet and Council on the 12<sup>th</sup> January. Throughout the period of engagement the Council's Planning Policy team have worked jointly with the Communications team to ensure that a comprehensive communications strategy has been delivered. This has been carried out in full accordance with the Council's Statement of Community Involvement and also included the first stage of an Equalities and Consultation Analysis.
- 3.2 The section below summarises the public engagement processes and the feedback received. This principally groups the engagement process into 1 of 5 categories:
- Public meetings (including Ward forums);
  - Public drop-in sessions;
  - Other engagement activity;
  - Community responses to both Plans;
  - Developer responses to both Plans; and
  - Responses to both Plans relating to the Duty to Cooperate

### **4 Public Meetings**

- 4.1 In order to respond to some of the development proposals in the Local Plan that were situated in areas that were most effected by the removal of land from the Green Belt a selection of public meetings were held across the city. These meetings were advertised in local media and by way of post card delivery to in excess of 1,000 homes within the immediate vicinity of each location. We have been advised that not all homes within the immediate vicinity received these cards informing them of the public meetings, however we are as confident as we can be that local communities were well aware of the Local Plan proposals and that if some homes were missed as part of the delivery, this has not hampered local communities abilities to respond to the Plans or attend public meetings or drop-in sessions.
- 4.2 The table below highlights the list of public meetings that were held. It is important to acknowledge that in the case of Cromwell Lane, the public meeting was original scheduled to be held jointly with the Westwood Ward Forum for the 9<sup>th</sup> February and this date was initially advertised in the Coventry Telegraph and on the Council webpage. Due to a change in date of the Ward Forum this date was then moved to the 16<sup>th</sup> February. To avoid confusion within the local community and to help maximise community engagement, the meeting on the 9<sup>th</sup> February was honoured and retained. As such, 2 meetings were held in this part of the city.
- 4.3 In the case of the Keresley evening meeting and drop-in session, these were originally scheduled for Lentons Lane Baptist Church and advertised in the Coventry Telegraph and on the Council webpage. This reflected initial difficulty arranging suitable venues within the immediate vicinity of Keresley. Following the initial publication of these meetings a number of responses were received from the local community requesting the meeting be moved to a venue closer to the

Keresley community. As a result of this community engagement a new public meeting and drop-in session were arranged at President Kennedy School. To avoid confusion within the local communities and to help maximise community engagement, the original meetings advertised at Lentons Lane Baptist Church were honoured and retained, although both were held as drop-in sessions instead of one being held as a public meeting.

- 4.4 In the case of the public meeting at Longford, this was held in tandem with the advertised Ward Forum. As mentioned above, one of the 2 meetings at Cromwell Lane was also held in tandem with the Westwood Ward Forum.
- 4.5 The table below clarifies the dates and venues for the public meetings as well as approximate attendance levels and an initial summary of the key discussion areas. Appendix 2 contains a full overview of the questions raised and the answers provided by officers.
- 4.6 A full copy of the presentation given at the public meetings and ward forums is included at Appendix 1

<b>Date of Public Meeting</b>	<b>Venue</b>	<b>Approximate Attendance</b>	<b>Key areas of discussion</b>
Tuesday 19th January	Eastern Green Public Meeting	300+	Objection to Green Belt development, especially within the Eastern Green area. Questions were also asked around infrastructure delivery and the relationship of new homes to existing residential communities. Concerns were also raised about the consultation timeframe and the release of information to support the process.
Tuesday 26th January	Whitley Public Meeting	0-50	Objection to Green Belt development, especially as part of an expanded Whitley Business Park. Concerns focused primarily around the possible impact on ecology and biodiversity in the local area and how new employment development would relate to existing residential communities. Questions were also asked about infrastructure delivery – most notably around highway improvements.
Wednesday 3rd February	Keresley Public Meeting	100-150	Objection to Green Belt development, especially within the Keresley area. Questions were also asked around infrastructure delivery and the relationship of new homes to existing residential communities.
Tuesday 9th February	Cromwell Lane Public Meeting	50-100	Objection to Green Belt development, especially in relation to land at Cromwell Lane. Specific concerns were raised around highway impacts along Cromwell Lane and the surrounding area. This

			included issues of parking pressures at Tile Hill Station and matters of highway safety. Questions were also asked around general infrastructure delivery and the relationship of new homes to existing residential communities.
Tuesday 16th February	Westwood Ward Forum and Cromwell Lane Public Meeting	50-100	The focus of the meeting mirrored that of the initial Cromwell Lane meeting.
Wednesday 17th February	Longford Ward Forum and Public Meeting	0-50	Discussions focused on matters of infrastructure – especially schools, cycle paths and public transport. Concerns about parking pressures were also raised. Discussions were also had around design and build quality.

- 4.7 In addition to the arranged public meetings, offers were made for officers to attend all Ward Forums across Coventry, all of which were held during the consultation period. The Local Plan and City Centre Area Action Plan were formally presented at 12 of the ward forums: Binley and Willenhall; Earlsdon; Foleshill; Henley; Longford; Lower Stoke; Radford; Upper Stoke; Westwood; Whoberley; Woodlands; and Wyken.
- 4.8 They were then discussed more informally as part of other business or related to other aspects of the agenda at 5 other forums: Cheylesmore (linked to JLR, Student accommodation and specific development schemes); Wainbody and Bablake (general discussion and Green Belt pressures); Sherbourne (heritage and conservation) and Holbrook (general discussion). No discussion was had at St Michaels ward forum.
- 4.9 It should be noted that a formal presentation was requested for Wainbody Ward Forum but due to other officer commitments at other advertised sessions it did not prove possible to attend. Offers were made to undertake a separate forum but these did not prove forthcoming.
- 4.10 This meant that the Local Plan and Area Action Plan were discussed at 21 public meetings and/or ward forums. Although some local residents were notable attendees at more than 1 event, it meant the Plans were presented to approximately 1,000 local residents over the course of these meetings.
- 4.11 The table below provides an initial summary of the Ward Forum discussions based on officers initial notes. Full notes and records of these events are currently being produced by the Ward Forum Support Officers. Those that are currently available are included in Appendix 3 of this report. The remainder will be included as part of the submission of material to the Secretary of State.

Date of Public Meeting	Venue	Approximate Attendance	Key areas of discussion
Thursday 21 <sup>st</sup> January	Holbrook	0-50	Although no formal presentation was given on the Local Plan or AAP, both Plans were highlighted as part of the Agenda. This drew attention to the consultation timetable and programme and encouraged residents to view the Plan on the Council's website or within local libraries.
Wednesday 27 <sup>th</sup> January	Bablake	0-50	Discussion focused around the consultation process and how previous consultation exercises were being taken into account. There were also questions about how the Green Belt review work had been used. Green Infrastructure was also highlighted and there was a desire to make sure new developments were well supported by new useable green spaces.
Thursday 28 <sup>th</sup> January	Foleshill	0-50	Discussion focused on the need to continue urban regeneration, including detailed points around empty homes and dilapidated properties. Opportunities to CPO old and vacant properties and rebuild with better quality homes would be supported in principle, especially if it helped create new, higher quality social housing. Support also expressed for improvements to highway infrastructure, highway safety and public transport.
Thursday 28 <sup>th</sup> January	Upper Stoke	0-50	There was general support for the Council's ambition to grow and improve the city. Support was also highlighted for the need for new homes. Concerns were raised though around the City Centre and its focus on students and the university in general. This led to discussions around student homes and HiMO's and their impacts on local communities. Parking standards were also discussed.
Tuesday 9 <sup>th</sup> February	Cheylesmore	0-50	Although no formal presentation was given on the Local Plan or AAP, a number of related issues were discussed. This included the planned expansion of JLR at Whitley and within Warwick District, issues around student accommodation and city centre developments at Friargate in particular.
Wednesday 10 <sup>th</sup> February	Sherbourne	0-50	A specific presentation was given on the city's heritage and historic environment. As part of this discussion reference was made to the Local Plan and the City Centre AAP.

Thursday 11 <sup>th</sup> February	Whoberley	0-50	Discussion focused around the need for new affordable housing and more purpose built student accommodation. Highway infrastructure was discussed, especially around the A45. Questions were asked about joint working with neighbouring authorities and how flood risks had been considered.
Thursday 11 <sup>th</sup> February	Woodlands	50-100	The focus of the meeting mirrored that of the initial public meeting at Eastern Green.
Tuesday 16 <sup>th</sup> February	Westwood	50-100	The focus of the meeting mirrored that of the initial Cromwell Lane meeting.
Wednesday 17th February	Binley and Willenhall	0-50	Discussions primarily focused around the need for development and how it would be supported by infrastructure. There was a feeling that the City Centre had become too student orientated and that more opportunities should be brought forward for non-student housing in the city centre. City centre car parking should also be improved. There was support for the links to the Willenhall Neighbourhood Plan.
Wednesday 17th February	Longford	0-50	Discussions focused on matters of infrastructure – especially schools, cycle paths and public transport. Concerns about parking pressures were also raised. Discussions were also had around design and build quality.
Thursday 18 <sup>th</sup> February	Wyken	0-50	Concerns were raised about Green Belt development and why the Local Plan needed to promote it. There was however support for highway improvements and it was suggested that connectivity between Coventry and Nuneaton be improved. Local traffic issues were also discussed and improvements requested as part of any new development in the area.
Wednesday 24 <sup>th</sup> February	Radford	0-50	Questions were asked about why Keresley had been singled out for such large scale development. Concerns were also raised around access to healthcare facilities and the capacity of the hospital and local schools. In terms of the city centre there was a feeling that it was becoming too student focused whilst improvements were also required to cycle infrastructure.
Wednesday 24 <sup>th</sup> February	Henley	0-50	Discussions focused on the possible developments at Walsgrave Hill Farm and how the site would be accessed in a suitable way. Public Transport provisions were also

			discussed as was the possible impact of new development on the local road network. Local free schools were highlighted whilst there was general support for the new Local Green Space proposals at Walsgrave Triangle on the basis it would not be converted to sports pitches.
Thursday 25 <sup>th</sup> February	Lower Stoke	0-50	Discussion focused primarily around the city's desire to be a Top 10 City again and how the Plans can support this. Discussion around the AAP suggested a need for a large community hall provision/theatre/exhibition space within the city centre.
Thursday 25 <sup>th</sup> February	Earlsdon	0-50	Discussions focused on the need for development in general and the origins of the population projections. Concerns were raised about the city's ability to accommodate such levels of housing and how infrastructure would be delivered to support growth. The forum supported the proposals to enhance the city centre but felt its current focus was too student orientated.

4.12 In terms of feedback, the strongest objections to the Local Plan were raised in Westwood (including Cromwell Lane), Woodlands (including Eastern Green), Whitley and Bablake (including Keresley), with objections to the principle of developing on Green Belt land and specific issues relating to proposed development sites. More general concerns around the loss of Green Belt land were discussed at Henley and Wyken Ward Forums.

4.13 In addition the other key areas of debate in relation to the Local Plan included:

- Infrastructure - both existing capacity and new provision – most notably around highways, drainage/flood risk, health care and education. In this context the strongest discussions were had at events in Woodlands, Henley, Earlsdon, Radford, Binley and Willenhall, Wyken, Longford, Westwood, Foleshill, Eastern Green, Whitley, Cromwell Lane and Keresley.
- Ecology and Biodiversity – the loss of Green Belt land was identified as impacting negatively on ecology and biodiversity as well as access to green spaces. This was a particularly sensitive issue in Whitley in relation to possible impacts on Stonebridge Meadows and Baginton Fields. Other discussions relating to the proposed Local Green Space designation at Walsgrave Triangle were had at the Henley forum whilst a need for new high, quality useable green spaces was raised at Bablake.
- the extent of consultation and the availability of detailed information was felt to be inadequate in a small number of cases. These concerns were raised at Bablake, Woodlands and Westwood Ward Forums as well as the related public meetings at Keresley, Eastern Green and Cromwell Lane.
- The suitability and appropriateness of background data and information, especially around population projections and the impact of the city's student

population. This issue was raised in detail at the Keresley and Eastern Green public meetings.

- The need for more affordable housing was discussed and supported in Foleshill and Whoberley.

4.14 Further discussions at the majority of forums focused on the robustness of the population projections for Coventry (and Warwickshire) and the housing needs that are derived from them and underpin the Local Plan. This was often linked to questions around the need to build on Green Belt land and a desire to see greater focus of development on brownfield land and continuation of urban regeneration.

4.15 In response, officers explained that the housing numbers were based on the most up to date data from the Office for National Statistics (ONS) and took account of household formation data issued by the Department for Communities and Local Government (DCLG). This data had then been developed over a number of years in partnership with independent planning consultants GL Hearn and all 6 of the Coventry and Warwickshire local authorities. It responds to national guidance which states that such data must provide the fundamental basis for projecting population growth and subsequent development needs. This approach is set out in the Joint Strategic Housing Market Assessment work which underpins the Local Plan for all Coventry and Warwickshire authorities. Each authority is of the view that this evidence provides a robust basis from which to develop respective Local Plans and have utilised it within the recent Memorandum of Understanding for Housing requirements across Coventry and Warwickshire.

4.16 Linked to this discussion, a number of concerns were raised around the student population, most notably at Westwood, Woodlands, Whoberley, Binley and Willenhall, Cheylesmore, Upper Stoke and Earlsdon. Officers explained that student population was taken account of through the ONS methodology and that the Plan promoted purpose built accommodation to help free up family homes. This also linked into discussion at these forums around Houses in Multiple Occupation (HiMO's).

4.17 With regards the City Centre Area Action Plan, the greatest discussions were had at Earlsdon, Lower Stoke, Radford, Binley and Willenhall, Whoberley, Cheylesmore and Upper Stoke. In general the plans for the city centre were well received at all meetings with 2 notable concerns being raised:

- City centre car parking – it was felt by some that the quality of car parking in the city centre needed to be improved and that ideally the costs of it would reduce to make it more competitive with out of town shopping parks and other towns and cities.
- Student orientation – It was felt by most that the city centre had become focused solely on students and the university. There were concerns that any development taking place in the city centre was solely university focused and that it was driving the city's wider population out to other locations such as Solihull and Leamington.

4.18 One overarching theme of the Ward Forums and public meetings that did gain support in principle was the need to grow and support the city's economy, creating more jobs for local people. It was also discussed that new homes should follow jobs growth and be located in close proximity in order to support sustainable development. This was also seen by many as an opportunity to link infrastructure and promote sustainable transport. This was an overarching theme of both Plans.



- 4.19 In addition to the ward forums and public meetings, invitations were sent to a range of local community groups and forums offering opportunities to discuss the Local Plan and AAP. Discussions were held in following 3 cases:
- The Coventry Society (in relation to the Historic Environment in general);
  - Coventry and Warwickshire Accessible Transport Group; and
  - The Coventry Tree Wardens Network;
- Notes of these meetings are included within Appendix 4.
- 4.20 Although a discussion meeting was held with Allesley Parish Council at the start of the consultation period, this related to their emerging Neighbourhood Plan as opposed to a detailed discussion on the Local Plan or AAP in general.
- 4.21 Discussions held with the Coventry Society focused primarily on the city's historic environment, with some reference made to both Plans. Comments from the Accessible Transport Group were generally positive and focused on the opportunities to access the city centre from new developments as well as design, connectivity and access to community facilities and services. There was also a desire to see more homes built within the city centre and a wider range of accommodation for older persons and those with disabilities. In particular it was suggested that the city centre should not just be for students.
- 4.22 The meetings with the tree warden's network highlighted the wider benefits trees can have to other aspects within policy including air quality, health and wellbeing, flood risk, development viability, design and historic environments. The importance of woodlands (both new and ancient) was discussed and there was support for protecting trees, woodlands and green spaces. The Plans aims and objectives to promote improved accessibility and usage of such areas within new developments were supported in principle. Future maintenance of these assets was raised though, and it was felt that the Local Plan could give greater emphasis to protecting trees and green spaces in a well maintained way for future generations.
- 4.23 In addition, Presentations and discussions were held with Historic England, The Coventry and Warwickshire LEP, the West Midlands Integrated Transport Authority (WMITA), Warwickshire County Council, the Coventry, Solihull and Warwickshire Duty to Cooperate group, and the West Midlands Metropolitan Duty to Cooperate group. Each of these engagement events helped discharge the Duty to Cooperate responsibilities that the Council have with appropriate stakeholders.

## **5 Public drop-in sessions**

- 5.1 In order to support the public meetings a selection of drop-in sessions were also arranged and advertised. These were again targeted in areas that were most effected by the Local Plans proposals to remove land from the Green Belt. Three sessions were also held in the city centre utilising a vacant retail unit on Smithford Way these were originally advertised to be held at a unit in Market Way, but due to the availability of the unit, it had to be changed to Smithford Way. This change of venue was advertised both at the original unit itself and on the Council website. All drop-in sessions were advertised in the same way as the Public meetings utilising the same post cards in order to link the public meetings and drop-in sessions together.
- 5.2 The table below highlights the list of drop-in sessions that were held. It is important to acknowledge that due to the change in venue for the Keresley meetings (outlined

above) the sessions at Lentons Lane Baptist Church were retained but were both held as drop-in sessions as opposed to 1 being a public meeting.

5.3 The table below clarifies the dates and venues for the drop-in sessions as well as approximate attendance levels. Unfortunately due to the nature of the events it did not prove possible to record full notes and records of the questions asked. Appendix 5 does however contain a full summary of the areas discussed. In general these mirrored the discussions that were held at the public meetings and ward forums, especially in relation to localised concerns.

<b>Date of Public Meeting</b>	<b>Venue</b>	<b>Approximate Attendance</b>
Thursday 4th February	Smithford Way, City centre	0-50
Friday 5th February	Smithford Way, City centre	0-50
Saturday 6th February	Smithford Way, City centre	0-50
Monday 8th February	Lentons Lane Baptist Church – converted from public meeting	0-50
Thursday 11 <sup>th</sup> February	President Kennedy School, Keresley	50-100
Monday 15 <sup>th</sup> February	St Andrews Church, Eastern Green	100-150
Tuesday 16 <sup>th</sup> February	Whitley Academy, Whitley	0-50
Wednesday 17 <sup>th</sup> February	Xcel Centre, Canley	50-100
Wednesday 24 <sup>th</sup> February	Grangehurst Primary School, Longford	0-50

## **6 Other Engagement Activity**

6.1 A range of additional activity has taken place over the course of the consultation process. This has included:

- A range of leaflets, info-graphics and promotional material made available in local libraries and council buildings;
- A number of post cards delivered to local communities to advertise and promote the public meetings and drop-in sessions.
- Specific radio interviews with the appropriate Cabinet Member
- Web based Survey Monkey questionnaire
- Letter and email notifications to Council consultation databases
- Update of the new Local Plan website;
- Other correspondence in local newspapers, radio and social media; and
- Site and area specific meetings (where they have been requested) to discuss Plan proposals and aid clarity.

6.2 Much of this activity has generated emails, phone calls and letters to the Council's Planning Policy team commenting on the Local Plan in more generic terms. Much of this engagement has however focused on a number of key themes, including the need for development of Green Belt land, site/area specific issues and detailed enquiries around the population projections and housing numbers. The most common area of engagement in terms of emails and phone calls has resulted from residents in the Keresley, Eastern Green and Cromwell Lane areas of the city

expressing particular concern around the potential development of Green Belt land in these particular areas.

- 6.3 It is worth noting that more public meetings and increased media coverage and promotional material has led to a notable uplift in engagement through day to day emails and phone calls, especially when compared to previous consultation activities relating to the Local Plan (or Core Strategy as it was previously known). Despite greater levels of engagement than previously undertaken on any version of the city's Plan before, the total number of responses to the Local Plan has stayed below 1,000 (including emails, letters, response forms and Survey Monkey responses). Responses to the Area Action Plan have increased slightly since the last consultation.

## 7 Community responses to Both Plans

- 7.1 In response to the consultation process responses were requested through a range of media. Although the Planning Inspectorates standardised form was provided for both documents to support the process (alongside technical guidance notes) it was not a fundamental requirement to provide responses in this way. Indeed, in order to support increased input from local communities the Council set up a Survey Monkey questionnaire online with a selection of less technical questions, this retained a strong degree of consistency with the areas of consultation expected by the Planning Inspectorate. In addition hard copies of the survey forms were made available in all local libraries, the Council House, Civic Centre 4 and at all drop-in sessions.
- 7.2 The Survey Monkey questionnaire contained 4 questions. These focused on the general views of both Plans as well as direct questions about the level of information available and views on the overarching objective of being a Top 10 City again. A total of 697 responses were received to the Survey Monkey process, although not everyone answered every question. Of these 499 related to the Local Plan and 376 to the City Centre AAP. The Table below highlights the number of responses received to each question.

Question	Answered	Skipped	Support	Object	Not Sure
Do you think Coventry should grow so it can be a top ten city?	692	5	204	379	109
What do you think of the Local Plan?	499	198	-	-	-
What do you think of the City Centre Area Action Plan?	376	321	-	-	-
Do you think you have had enough information and opportunities to tell us what you think about the Local Plan and the City Centre Area Action Plan?	504	193	83	353	68

NB: Numbers of support and objection are to be updated.

- 7.3 Based on officer's initial review of the responses to Survey Monkey questionnaire, it would appear that all responses are from local residents and some do overlap with other responses received to the Local Plan.
- 7.4 In addition to the questionnaire responses a total of 240 consultation responses were received from a variety of sources to the Local Plan. These were submitted either via email or in writing and included completed survey forms from libraries and drop-in sessions. The responses included a response from Jim Cunningham MP as well as 9 other councillors from Coventry and Warwickshire. 139 of these responses were from local residents and a further 91 were from individual companies or organisations (including neighbouring Councils).
- 7.5 In addition a total of 4 petitions were received:
- 29 signatures objecting to development of land in the Green Belt and at Eastern Green
  - 715 signatures objecting to plans to re-classify Green Belt land at Eastern Green
  - 351 signatures (at the time of writing) raised by the Allesley Green Residents' Association objecting to proposal to reclassify the Green Belt status within the city boundary in order to provide for additional housing, retail and industrial buildings.
  - 250 signature petition asking that the land at Baginton Fields be designated as Local Green Space.
- 7.6 In general local communities and residents responded in objection to the Local Plan proposals. They were generally focused on 2 key areas. Firstly around the consultation period and a perceived lack of engagement on the Local Plan in particular. Secondly, around the development of land currently within the Green Belt in general and at specific locations, most notably Cromwell Lane, Eastern Green, Whitley and Keresley. This included references to encroachment on the Meriden Gap and concerns over the possible merging of Coventry with neighbouring towns and cities. In raising objections residents and communities did raise a range of comments relating to site specific issues and concerns. These included:
- Highway capacity and safety and the need for improvements and investment;
  - Lack of existing capacity in local school places;
  - Lack of existing health care capacity;
  - The importance of infrastructure provisions in general;
  - Drainage and flood risk issues, both on sites proposed for development and subsequent impacts on existing built up areas;
  - The importance of any new development being well integrated into the existing urban area;
  - The importance of any new development being high quality design;
  - That if development does happen that it is well landscaped and includes an appropriate buffer/screening to existing homes;
  - The ability of utilities to cope with planned growth; and
  - The impacts of development on local ecology and biodiversity, including ancient woodlands, trees and hedgerows.

As such, the responses received to the consultation process on the Local Plan have mirrored the feedback received at public meetings, ward forums and drop-in sessions. This is likely to reflect, to some degree at least, some overlap between those attending these sessions having subsequently submitted written responses.

- 7.7 With regards the City Centre AAP, a further 15 responses were received, with 12 being from organisations and companies whilst the other 3 were from local residents. Again the responses received via Survey Monkey appear to have all originated from local residents and communities. As such a total of 379 responses were received to the AAP from local residents. These issues again mirrored the discussions had at the public meetings and drop-in sessions and focused on the following points:
- Coventry University is too dominant within the city centre;
  - There is too much student residential development – there should be more homes built for non-students;
  - Support was expressed for the possibility of exposing part of the River Sherbourne;
  - Many responses included a general support for regenerating the city centre and recognised the need to improve its retail and leisure offer;
  - There was general support for the continuation of the recent public realm initiatives;
  - There was support for maximising our historic environment and improving awareness and access to it;
  - Responses highlighted a need to improve the city centre parking offer and overall accessibility into the city centre;
  - The regeneration of Cathedral Lanes was supported alongside a desire to see further improvements to the night time economy; and
  - There was a desire to see more trees and green spaces within the city centre to help improve the natural environment.

## **8 Responses to both Plans from Companies and Organisations**

- 8.1 As highlighted above a total of 91 responses were received to the Local Plan from other companies and organisations. Of these 13 were received from neighbouring councils (including parish and town councils), a further 5 from other Duty to Cooperate bodies and 9 from other local groups or organisations. This left a further 64 responses from the development industry or large employers/companies in the local area. This included national and local house builders, planning consultancies and land agents/promoters as well as both Universities and Jaguar Land Rover.
- 8.2 In general, responses from this grouping were positive and broadly supportive of the approach the Local Plan was taking. This included recognition that the city could not accommodate its full housing needs within its own boundaries, but that the Plan had taken an appropriate and well evidenced approach to growth and development. There was also support for site proposals and broad support for the key infrastructure and design principles associated with them. There were however some areas of challenge and objection, which largely focused around issues of housing policy, Green Belt/Local Green Space, Environmental Management policies and Retail policies. These covered the following areas:
- An over projection of available brownfield land and land within the existing urban area. Responses suggested capacity could be nearer the 11,000 mark instead of the 16/17,000 figure talked about in the Plan;
  - An under estimation of overall capacity due to a number of sites being discounted which could otherwise be included. These include:
    - Land south of Duggins Lane - housing
    - Land at Duggins Lane - housing
    - Land north of Duggins Lane - housing

- Land east of Pickford Green Lane - housing
- *Land west of Pickford Green Lane - housing*
- *Garages at Braemar Close - housing*
- Land at Rookery Farm, East of Coundon Wedge Drive - housing
- President Kennedy Sports Fields, Waste Lane – housing and/or education
- *Land at Austin Drive – retail expansion*

NB: The sites in italics above are sites which have not previously been considered through the Local Plan or SHLAA process.

- An under estimate of housing need both locally and within the sub-region. Some responses felt the need in Coventry should be nearer 50,000 and the need in Coventry and Warwickshire as a whole in excess of 100,000 homes over the same plan period;
- Over prescriptive policies around density and housing types;
- Over prescriptive policies around affordable housing delivery;
- Impacts of Keresley SUE on highways and connectivity at Pro-Logis Park;
- Lack of positive policy around self-build homes and calculation of demand for such properties;
- Over burdening requirements within the Environmental Management section - especially around a drive to carbon neutral homes, renewable energy provisions and sustainable construction;
- Over allocation of retail space to the city centre;
- Unnecessary restriction on further growth of Arena Park retail area;
- Removal of a small number of areas from the proposed Local Green Space designation – especially at the University of Warwick and the Alan Higgs Centre;
- Expansion of the Local Green Space designation at Charterhouse fields; and
- Limited concern to the approach to Local Green Space in general.

8.3 In addition to the developer led organisations and businesses, a number of responses were received from local groups and specialist organisations to the Local Plan. In total 9 responses were received from:

- The Coal Authority
- Sport England
- CPRE (Campaign to Protect Rural England)
- The Woodland Trust Coventry Society;
- Warwickshire Wildlife Trust;
- Coventry Tree Wardens Network;
- The Coventry Green Space and Heritage Forum;
- President Kennedy School; and
- Bishop Ullathorne RC School.

8.4 These responses were more specialist in nature reflecting their specific areas of interest. Generally comments were positive but did seek some areas of clarification, concern and suggested amendments. These can be summarised as follows:

- The Coal authority raised concern about the lack of policy around land stability and mining legacy and felt that such evidence should have been given greater consideration in the SHLAA and site appraisal process.
- Sport England has raised points of clarity around the standard of replacement sports pitches linked to sites H2:19 and JE2:4 and whether or not the replacement provisions would actually be new facilities.

- The CPRE have raised a number of objections relating to the quantum of housing and employment needs and the impacts this could have on the Green Belt of Coventry and Warwickshire.
- Both the Woodland Trust and the Coventry Tree Wardens Network have sought a strengthening of policy GE3 and GE4 in particular around trees, hedgerows and ancient woodlands to ensure they remain protected for future generations
- Warwickshire Wildlife Trust raises specific concerns about possible impacts on Local Wildlife sites and ancient woodlands as a result of planned allocations. Of particular concerns are the Sutton Stop site (primarily the land to the east where it relates more to the canal area), Keresley, Eastern Green and Whitley.
- The Coventry Green Space and Heritage Forum raise a number of clarification points around on-going protection of parks and green spaces across Coventry and clarification around the Local Green Space designations.
- With regards the schools, Bishop Ullathorne have requested an adjustment to policy GB2 to clarify that the school land that may be removed from the Green Belt would still be retained for education purposes. President Kennedy on the other hand have promoted the site of their existing playing fields at Waste Lane as a possible redevelopment site for either homes or education (or both).

8.5 In relation to the Area Action Plan, a total of 12 responses were received from developers and organisations, of which 2 were Duty to Cooperate related. The remaining 10 were largely supportive, although The Woodland Trust has requested strengthening of policies around the natural environment. A further representation has raised concerns about the ability of the city centre to deliver as much retail floor space as has been allocated and how this relates to the evidence base. This reflects a similar objection to the retail section of the Local Plan.

## **9 Responses to both Plans relating to the Duty to Cooperate**

9.1 The Duty to Cooperate is of particular importance to both Plans and requires the on-going cooperation and joint working with neighbouring councils and a range of strategic stakeholders to ensure the Plan promotes sustainable development. Policy DS2 of the draft Local Plan and its supporting text reflects the City Council responsibilities under the Duty to Cooperate and makes a solid commitment to on-going cooperation. Although some organisations have queried the inclusion of this policy, there has also been a degree of support for the policy as it reflects that on-going commitment. This is recognised by some as being particularly important at a time where a proportion of Coventry's housing and employment land needs will be delivered in neighbouring authorities.

9.2 With regards neighbouring authorities, Rugby Borough Council (RBC), Warwick District Council (WDC), Solihull Metropolitan Borough Council (SMBC), North Warwickshire Borough Council (NWBC), Stratford on Avon District Council (SADC), Nuneaton and Bedworth Borough Council (NBBC) and Warwickshire County Council have all responded to the Local Plan consultation.

9.3 All responses from these authorities have been positive and reflect the work that has been undertaken jointly across Coventry and Warwickshire in recent years. Notwithstanding a few points have been flagged up as follows:

- RBC recognise and support the position of Ansty Park and Pro-Logis Park Ryton and that they contribute towards Coventry's employment land needs
- RBC highlight some points of clarification in relation to 2 SHLAA sites and seek the Council's on-going commitment to maximising its housing land opportunities

- NWBC seek longer term commitment to infrastructure investment and growth opportunities beyond the life of this Plan
- WDC highlights their emerging approach to land south of the city boundary at Kings Hill and Westwood Heath. This may impact on Policy GB2 as both plans evolve
- WDC seek on-going commitment to continued joint working around infrastructure delivery around the city's southern boundary. This reflects the city's own Local Plan policy DS2.
- WCC highlight the importance of continued working between CCC and WCC as highway authorities to ensure appropriate infrastructure is brought forward.
- NBBC highlight the importance of continuing to undertake joint working between the 2 authorities and highlight the Conservation Area at Hawkesbury as an opportunity for future joint work.

9.4 In addition to neighbouring councils a number of objections were received from parish and town councils and residents association. Although not directly linked to the Duty to Cooperate they are important considerations in the overall Plan making process. Keresley, Baginton and Fillongley Parish Councils made formal objections to the Plan linked to the development of land within the Green Belt within or near to their respective areas, as did the Cromwell Lane and Duggins Lane Residents Association and Allesley Green Residents Association. Kenilworth Town Council raised similar concerns. Gosford Park Residents Association and Charterhouse Residents Association have raised objections to the Local Plan with regards its approach to Houses in Multiple Occupation and student housing. South Earlsdon Neighbourhood Area also mirrored these concerns whilst also raising explicit concerns linked to the consultation process. The Charterhouse Residents Association also raised a request to amend policy HE3 in particular around the approach to the Heritage Park proposals and possible expansion of Bluecoats school.

9.5 Other Duty to cooperate stakeholders who have provided responses to the Local Plan can be summarised as follows:

- West Midlands Integrated Transport Authority makes a range of comments around the accessibility chapter of the Local Plan, but is broadly supportive of its content. Comments predominantly focus on strengthening and clarifying a few areas around public transport connectivity and accessibility
- Natural England generally supports the strategic approach taken to the protection and enhancement of the environment through the policies in this plan and supports the Habitats Regulation Assessment.
- The C&WLEP is again broadly supportive of the Plan. Its main comments focus on the need to maintain a constant supply of employment land which is available to meet the needs of the city's economy and support jobs growth.
- Highways England wish to ensure on-going discussions around development proposals, especially where they may have an impact on the strategic highway network. This is particularly related to funding and securing developer contributions to facilitate key aspects of infrastructure.
- Historic England seeks clarification around the impacts of some development proposals on listed buildings and conservation areas themselves and also the setting of some buildings and areas as a result of development proposals.
- The Environment Agency seeks some minor modifications to the Local Plan policies around flood risk (in particular Policies EM4 and EM5). Officers expect to undertake further engagement with the Environment Agency in the coming weeks, and in advance of submission of the Plan to secure a Statement of



Common Ground around these policy areas. There is already an existing agreement however that the Local Plan seeks to safeguard new and existing property from flood risk and implement infrastructure which will help mitigate existing risks.

- 9.6 At this time, no responses have been received from utility providers (including Severn Trent), emergency service providers or NHS England.
- 9.7 In relation to the City Centre AAP, similar areas of discussion have been raised by the Environment Agency, although the Plan approach to deculverting is supported. Historic England also raised similar comments in relation to the historic environment in the city centre. In addition the city's neighbouring authorities have also expressed general support for the Area Action Plan and regeneration of the city centre.

## **10 Proposed Changes to both Plans**

- 10.1 Following the consultation process there are a small number of amendments and minor changes that are proposed for both Plans. These changes are small and predominantly aid clarification and certainty of the Plans. All proposed changes are included in a schedule at Appendix 8 alongside reasons for them being made. A full tracked change version of both plans will be included as part of the material submitted to the Secretary of State.
- 10.2 It is important to stress that it is the appointed Planning Inspector who will determine whether or not these changes can be made to the Plan having had regard to the consultation responses and the outcomes of the public examination. It is however the Council's responsibility to bring them to the Inspectors attention to aid the process, hence the inclusion of the schedule at Appendix 8.

### **List of Appendices:**

1. Copy of the public meeting and ward from presentation slides
2. Notes of public meetings
3. Records of Ward Forums (available at this time)
4. Notes of other meetings (where available)
5. Summary notes of drop-in sessions
6. Full Local Plan representations
7. Full City Centre AAP representations
8. Schedule of proposed changes to the Local Plan and City Centre AAP

With the exception of Appendix 8, which is included alongside this report, all other appendices are available via the Councils website – [www.coventry.gov.uk/localplan](http://www.coventry.gov.uk/localplan) . These appendices are clearly marked and are on line only to reflect their size and level of detail. They are however available in paper form to members of Scrutiny Board 3 on request.

**Mark Andrews**  
**Planning and Housing Policy Manager**  
**Place Directorate**  
**02476 834295**

