
To: The Scrutiny Coordination Committee

Date 10th May 2017

Subject: Feedback on the Local Plan and City Centre Area Action Plan - Proposed Modifications Consultation (March 15th 2017 – April 28th 2017)

1 Purpose of the Note

1.1 The purpose of this note is to provide the members of the Scrutiny Coordination Committee with a summary of the feedback and consultation responses received to the statutory period of public consultation between March 15th and April 28th 2017, in so far as they relate to the proposed modifications to the Draft City Centre Area Action Plan (AAP) and the Draft Local Plan.

1.2 This paper responds to recommendation 3 of the Local Plan and City Centre AAP proposed modifications report endorsed by Cabinet and Council at their respective meetings on the 7th and 14th March 2017. For the avoidance of doubt, the recommendation read as follows:

“Delegates authority to the Executive Director of Place, in consultation with the Cabinet Member for Community Development, the Chair of Scrutiny Coordination Board and the Chair of Planning Committee, to take full account of the responses received to the statutory period of public consultation, propose any further minor amendments to both Plans (where this is necessary to correct any errors and aid clarity) and submit the Plans back to the Secretary of State’s nominated Inspector for her final consideration”.

This report has now been presented and supported by the Executive Director of Place (now referenced as Deputy Chief Executive – Place).

Further briefing sessions are to be held with the Cabinet Member for Community Development (Cllr Bigham) and the Chair of Planning Committee (Cllr Brown) in advance of the committee meeting on the 10th May 2017.

It is presented to the Chair of the Scrutiny Coordination Committee as part of this meeting.

2 Recommendations

2.1 The Scrutiny Coordination Board 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 drop in sessions and the schedule of proposed minor changes to the Secretary of States nominated Inspector for her consideration as part of the on-going 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 Wednesday 15th March and finished on Friday 28th April 2017. The Plans did however become public on the 28th February in advance of them being considered by Cabinet and Council on the 7th and 14th March respectively. Throughout the period of engagement the Council's Planning and Housing 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 with a degree of consistency with the consultation programme utilised in early 2016.
- 3.2 The section below summarises the public engagement processes and the feedback received as of 3pm on Friday 28th April. A further summary of responses received after that point on the final day of the consultation will be provided in the form of an addendum note. This additional note will be made available to members of Scrutiny Coordination Committee as soon as possible in advance of the meeting on the 10th May. This note principally groups the engagement process into 1 of 4 categories:
 - Public drop-in sessions;
 - Other engagement activity;
 - Community responses to the proposed changes to both Plans; and
 - Other responses to the proposed changes to both Plans (including those from developers, neighbouring councils and other stakeholders).

4 Public drop-in sessions

- 4.1 In order to support the consultation process a selection of drop-in sessions were arranged and advertised. Five of these sessions were again targeted in areas that were most effected by the Local Plans proposals to remove land from the Green Belt, with a sixth session held at the city centre library. A total of 6 sessions were therefore held across the city. The city centre drop-in session was held on a Saturday covering the morning and lunch time period. The remaining five sessions were held across the late afternoon and early evening. This was intended to facilitate attendance after school and work times.
- 4.2 The drop-in sessions 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 and have managed two specific complaints to this regard, both relating to the Keresley area of the city. As part of reviewing those complaints it was apparent that not all local roads were covered by the original post card distribution around Keresley. This was rectified by a further post card delivery run in the two days preceding the Keresley drop in session. The initial non-delivery of post cards to some local roads around Keresley was a result of an assumption based on the positive experience of last year's post card delivery work. The previous post card delivery run (in January 2016) had yielded significant interest in the Keresley area, with the main point of concern being the venue for the

public meetings, which was subsequently changed. In addition to the two formal complaints received in relation to the Keresley area some concern was raised at the drop in sessions themselves at both Eastern Green and Whitley. This was with regard to the extent of post card distribution as opposed to failure to receive such post cards. On a more positive side, a number of local residents attended sessions specifically in response to the post cards being delivered to their home. Based on officers' experience of the drop-in sessions, we are therefore as confident as we can be that local communities were sufficiently aware of the proposed changes to both Plans and that if some homes were missed as part of the initial delivery process, this has not appeared to have hampered the local communities ability to respond to the Plans or attend drop-in sessions.

- 4.3 The table below clarifies the dates and venues for the drop-in sessions as well as approximate attendance levels and key points of feedback. Unfortunately due to the nature of the events it did not prove possible to record full notes and records of the questions asked. Appendix 1 does however contain a full summary of the areas discussed. In general these picked up on localised concerns and were broadly consistent with the concerns raised at the previous consultation events in 2016.
- 4.4 To support the drop-in session's officers provided copies of the Local Plan maps and Frequently Asked Questions. These were provided in paper form and as part of laminated display posters. Officers also utilised other evidence documents that have supported the Plans development to explain different proposals to local residents. In addition to paper documents officers were also able to utilise new Council IT including lap tops and mobile internet to explain site specific maps and to provide additional relevant detail when required.

Date of Public Meeting	Venue	Approximate Attendance	Key areas of discussion
Friday 24 th March 2017	Xcel Centre, Canley	50-100	Objection to Green Belt development, especially within the Cromwell Lane, Kings Hill and Westwood Heath areas (the latter two being within Warwick District). Questions were also asked around infrastructure delivery, most notably around highway pressures and congestion. This also included issues of parking pressures at Tile Hill Station and matters of highway safety. A number of questions were raised in relation to Brexit, population projections, student numbers and the overall need for green belt release and housing development.
Saturday 25 th March 2017	Central Library, City Centre	0-50	Discussions at the city centre session were diverse and picked up a range of discussions that mirrored those at the area specific meetings. This included issues relevant to Keresley, Eastern Green, Westwood and Baginton Fields. In addition

			there was targeted city centre discussion around homelessness and rough sleeping, city centre regeneration and general support the proposed schemes such as City Centre South. Concerns were raised however about the perceived university focus within the city centre.
Monday 27 th March 2017	Eastern Green Social Club	200-250	Objection to Green Belt development, especially within the Eastern Green area. Questions were asked around infrastructure delivery, most notably around highway pressures, site access and links to the surrounding road network. Questions were also raised about the relationship of new homes to existing residential communities, new school provision and new health care facilities. A number of questions were raised in relation to Brexit, population projections, student numbers, the Housing White Paper and the overall need for Green Belt release and housing development. Objections focused predominantly on housing delivery but also related to the employment and retail elements of the proposed scheme.
Wednesday 29 th March 2017	President Kennedy School, Keresley	100-150	Objection to Green Belt development, especially within the Keresley area. Questions were asked around infrastructure delivery, most notably around highway pressures, site access and links to the surrounding road network. This also picked up discussion around the proposed link road and Jubilee woodland. Questions were also asked around infrastructure delivery and the relationship of new homes to existing residential communities, new school provision and new health care facilities. A number of questions were raised in relation to Brexit, population projections, student numbers and the overall need for Green Belt release and housing development.
Thursday 6 th April 2017	Grangehurst Primary School,	0-50	Discussion focused more around the Keresley proposals and the cross boundary impacts with areas such

	Longford		as Ash Green. Localised discussion focused on support for retaining Green Belt around Lentons Lane. Whilst requests were made to improve bus provisions in communities north of the M6.
Tuesday 11 th April 2017	Whitley Academy School	50-100	Objection to Green Belt development in general, but most notably around the Baginton Fields site and proposals to expand Whitley Business Park. Concerns focused primarily around the possible impact on ecology and biodiversity in the local area and loss of local nature trails and wildlife. There were also concerns about how new employment development would relate to existing residential communities and how the site would be accessed. Questions were also asked about infrastructure delivery – most notably around highway improvements and air quality. Discussion also criticised the level of consultation and how responses had been taken into account in developing the Plan.

4.5 In addition to the drop-in sessions opportunities to attend other public meetings were explored. Unfortunately due to timing issues only one ward forum was held during the consultation process – at Westwood ward. Although officers were unable to attend the ward forum itself a briefing note was provided to the ward councillors for distribution at the forum meeting. A further briefing note was provided to support on-going consideration of the Plans within Wainbody ward. This was also provided at the request of the ward councillors. Further information was also provided in advance of the Finham Parish Council meeting on the 24th April 2017.

4.6 In terms of feedback, the strongest objections to the Local Plan were again raised in the areas around Cromwell Lane, Eastern Green, Whitley and Keresley, with objections to the principle of developing on Green Belt land and specific issues relating to proposed development sites.

4.7 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.
- The relationship of existing homes to the new proposed developments and how these would be integrated and screened. This was a particular issue at Eastern Green, Keresley, Westwood and Whitley.
- 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.

- Although the length of the consultation period was debated less this time, matters of consultation and notification continued to be an issue for local residents. The availability of detailed information was felt to be inadequate in a number of cases and in Keresley in particular complaints were made about the poor distribution of post cards to advertise the consultation programme.
- The suitability and appropriateness of background data and information, especially around population projections and the impact of the city's student population. A number of objections continued to feel that the growth projections for the city were too high and were skewed by the city's student population. This matter formed a key part of discussions on local radio. Matters relating to Brexit were also mentioned and whether or not this could impact on the city's growth.
- A desire to see greater focus of development on brownfield land and continuation of urban regeneration. This was often linked to questions around the need to build on Green Belt land in the first place and the potential for phasing the release of land.

4.8 With regards the City Centre Area Action Plan, discussions were limited and the plan appears to have gained genuine support. The greatest discussions were had at the City Centre, Longford and Whitley drop in events, although it was also discussed briefly at Eastern Green. The most notable areas of discussion included:

- 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 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.
- Importance of new leisure and retail opportunities – this was linked to general support for the proposed regeneration programmes at City Centre South etc. there was a recognition that the city centre needed to regenerate itself to attract new investment and increase foot fall.

4.9 One overarching theme of the drop in sessions was a support in principle for 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, although there were local concerns about employment based development at Eastern Green and further expansion of the Whitley business park. Opportunities to provide more affordable homes and combat problems of homelessness and rough sleeping were also supported. These matters were discussed specifically at the city centre drop in session.

5 Other Engagement Activity

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

- A range of information made available in local libraries and council buildings;

- As referenced above, a number of post cards delivered to local communities to advertise and promote the drop-in sessions;
- Radio interview with BBC Coventry and Warwickshire;
- Letter and email notifications to Council consultation databases;
- Update of the new Local Plan website with a specific section on proposed modifications;
- Other correspondence in local newspapers, Citivision, radio and social media; and
- Site and area specific meetings (where they have been requested) to discuss Plan proposals and aid clarity.

5.2 Much of this activity has generated emails, phone calls and letters to the Council's Planning and Housing Policy team commenting on the Local Plan and City Centre AAP 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 Community responses to Both Plans

6.1 There has continued to be a sizeable interest in the Plans and attendance at all drop in sessions was at least on par with previous events in early 2016, with increased attendance in many cases. Officers are of the view that this is reflective, in part at least, of the increased distribution of emails and letters to interested parties following the collation of contact details at the last stage of consultation. Despite high levels of engagement and interest in both plans though the total number of responses (received at the time of writing) has declined compared to the previous consultation stage. At the time of writing 169 responses had been received to the Local Plan and 5 to the City Centre AAP. This compared to more than 700 responses in the previous round of consultation.

6.2 As part of the consultation process responses were requested either via written letter or email. This responded to the technical difficulties experienced with standardised response forms used previously and the apparent preference for submitting own comments in a more informal and personal way. In addition, and due to the targeted nature of the consultation – focusing on the proposed changes to both Plans as opposed to the Plan in general a Survey Monkey process was not applied to this consultation as there were no specific questions to seek responses to.

6.3 At the time of writing no new petitions had been lodged or received by the Council relating to the Proposed Modifications for the Local Plan or City centre AAP.

6.4 Of the 174 consultation responses currently received, 151 were from local residents or community groups with all but 1 relating to the draft Local Plan. In addition 2 responses were received from Coventry ward councillors.

6.5 In general local communities and residents responded in objection to the Local Plan proposals. They were generally focused on 1 key area – namely the loss of Green

Belt land to development and the related implications and reasons behind it. These concerns tended to manifest themselves in relation to 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. It also raised concerns about nature conservation, ecology and biodiversity. 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;
- Greater clarity as to what such a buffer could look like and how big it would be;
- The ability of utilities to cope with planned growth;
- The impacts of development on local ecology and biodiversity, including ancient woodlands, trees, hedgerows, nature reserves, nature trails and community green spaces; and
- The lack of a dedicated phasing policy and failure to exhaust all brownfield opportunities before releasing Green Belt land.

As such, the responses received to the consultation process on the Local Plan have mirrored the feedback received at the drop-in sessions as well as the responses received at last year's consultation stage.

- 6.6 One notable addition was a number of references made to the Housing White Paper. Although there was some consistency with the issues raised by some parts of the development industry, the concerns raised by local communities were wider and focused predominantly on the importance of estate regeneration, brownfield development and protecting the Green Belt and natural environments.
- 6.7 With regards the City Centre AAP, a total of 5 responses were received at the time of writing. Thus far responses have been focused around singular issues and have not necessarily reflected the discussions had at the drop in sessions. The issues raised can be summarised as follows:
- The importance of regenerating the city centre – including around Hertford Street;
 - The importance of promoting a unique selling point for the city centre; and
 - The importance of promoting and managing dedicated leisure provisions within the city centre.

7 Other Responses to both Plans

- 7.1 At the time of writing, 16 responses have been received to the Local Plan from other companies and organisations. Thus far only 1 has been received from neighbouring councils (including parish and town councils). Of these 17 responses

10 are 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.

- 7.2 Responses from this grouping tended to focus on 1 of 2 viewpoints. The first of these viewpoints was from those promoting sites allocated within the Plan and was broadly positive and supportive of the approach the Local Plan was taking. This included continued 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. This included broad support for the new Masterplan Principles policy and the updated Infrastructure Delivery Plan, albeit with a small number of suggested adjustments to detailed wording. The other view point highlighted concerns about how the proposed modifications to the Local Plan responded to the Housing White Paper, with a particular focus on the point about when Local Plans should be reviewed. Concerns were also raised in relation to the Nuneaton and Bedworth Borough Plan and its identified shortfall against the Coventry and Warwickshire Housing Requirements Memorandum of Understanding. There was also some suggestion that housing needs within the city and across the sub region as a whole were higher and should be appropriately reflected in Plan.
- 7.3 There were also other areas of continued challenge and objection, which largely reflected previous areas of objection that had not been successfully, addressed during the examination hearings. Of particular focus was the changes made to the Environmental Management policies and the continued exclusion of certain sites such as those around Duggins Lane.
- 7.4 In addition to the developer led organisations and businesses, a number of responses were received from local groups and specialist organisations (some of which have responsibilities around the Duty to cooperate) to the Local Plan. In total six responses have been received thus far and 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:
- Warwickshire Wildlife Trust – general support but with suggested small adjustments to wording for policy DS4 in particular..
 - Natural England – no further comments to make
 - Woodland Trust – general support but with suggested small adjustments to wording for policies GE1 and GE3.
 - Historic England – highlight the Statement of Common Ground and positive work undertaken to overcome previous concerns. Subsequent correspondence has highlighted the work undertaken in partnership for the Local Plan and AAP to be exemplar with regards the historic environment.
 - 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.
 - The Coal Authority – support in principle for the proposed changes to reflect mining legacy issues, but wish to see this go further, especially in Policy EM2. Also query the relevance of new policy EM10.

- 7.5 In relation to the Area Action Plan, a total of 4 responses were received from developers and organisations. The Coal Authority, Historic England and Natural England had no further comment to make on the AAP, whilst representatives from the Coventry Techno Park expressed a desire to see a greater unique selling point for the city centre with greater focus on leisure developments to help attract new business and footfall.
- 7.7 The Duty to Cooperate is of particular importance to both Plans. Although engagement relative to both Plans is technically intended to end at the point the Plans are submitted, we have continued to work closely with neighbouring councils and other relevant stakeholders to ensure the Plans remain sound, legally compliant and deliverable. We have also worked closely with other Councils to support the preparation and development of their own respective Plans, especially in regard to the Housing and Employment MOU's for Coventry and Warwickshire. In deed this has seen an Employment Land MOU approved by all 6 Coventry and Warwickshire authorities after the city Councils plans were submitted and further engagement with Warwick District Council on cross boundary matters relating to both Plans at their respective examination stages. As such, information was shared with all respective Duty to Cooperate bodies and groups including: Historic England, The Coventry and Warwickshire LEP, NHS England, Transport for West Midlands, Warwickshire County Council, the Coventry, Solihull and Warwickshire Duty to Cooperate group, and the West Midlands Metropolitan Duty to Cooperate group. In this context the Council has continued to maintain channels of communication and cooperation by way of good practice and partnership working.
- 7.8 At this time, we have had 1 response from Solihull Metropolitan Borough Council expressing their continued support for the Plan. With this exception no further responses have been received from neighbouring authorities, utility providers (including Severn Trent), emergency service providers or NHS England.

8 Proposed Changes to both Plans

- 8.1 Following the consultation process there are a small number of 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 2 alongside reasons for them being made. It is intended that these additional amendments will be provided to the Inspector as part of an invitation to include them if she feels it appropriate. Due to their nature it is not envisaged that further consultation would be required in relation to these amendments.
- 8.2 It is important to stress though that the final consideration of these changes alongside those which have been subject to this consultation rests with the appointed Planning Inspector.

List of Appendices:

1. Summary notes of drop-in sessions
2. Schedule of possible further amendments to the Local Plan.

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