

Key issue summary	
Chapter 1 - Introduction	
	<p>The lack of a transport model and evidence have been raised by a representor, alongside encouragement of cooperation; additionally, expressing preference towards the adding of the A46 Coventry Junctions Scheme to the CASM 2041 Baseline.</p> <p>Some supportive comments were received regarding the Vision, One Coventry Plan and the support for redevelopment with the goal of improving the economy, sustainability and life quality in the area, however the lack of allocation of Central City Industrial Estate was questioned.</p>
Chapter 2 - The Vision	
	<p>Supportive comments were received from some representors regarding the fight against climate change, promoting sustainability, moving towards a zero-carbon economy and ongoing collaboration.</p> <p>A representation was received in general support of the Vision, however criticising policies DS1, DS2, JE1, JE2 and GB1 as contradictory to the Vision.</p>
Chapter 3 - Overall Levels of Growth and the Duty to Cooperate	
Policy DS1 - Overall Development Needs	<p>Some comments were received regarding the Plan period being too short, the Plan having a retrospective start date and an early review being necessary, concerns about Duty to Cooperate regarding unmet need from neighbouring authorities.</p> <p>The low provision of housing, including affordable housing, as well as overprovision of PBSA, and lack of Green Belt review were also brought up. An issue with the evidence base not sufficiently demonstrating exceptional circumstances was raised. An opposing issue was brought up, detailing that the proposed housing figure is too high and community needs are ignored.</p> <p>Additionally, the issue of not meeting the employment land need and the allocation of Baginton Fields have been raised. Some comments were received regarding lack of details for modernisation and improving the quality of existing floor space on employment sites.</p>

	<p>Some comments were received in favour of proposed delivery of sustainable transport on development sites. A critique of the SUEs destroying the environment, lack of protection of the Green Belt and lack of master planning was brought up.</p>
<p>Policy DS2 - The Duty to Co-operate and partnership working</p>	<p>Positive comments received regarding participation in Duty to Cooperate meetings, commitment to cooperate and ongoing collaboration. Furthermore, acknowledgement received in relation to the lack of space within the city.</p> <p>Issues with the housing need number provided being too low and the exporting of unmet housing and employment needs to the Neighbouring Authorities before considering availability within the city were raised. Comments encouraging the release of sites from Green Belt were received. Lack of evidence regarding the unmet needs being met through Duty to Cooperate was brought up. Comments urging the reconsideration of new employment sites and new junctions were received. Issues regarding lack of transparency when it comes to Duty to Cooperate were raised.</p> <p>The deliverability of sites was questioned by some representations. Comments were received regarding Coventry residents' access to affordable housing opportunities within Warwickshire.</p> <p>Some comments regarding a surplus of available housing land, encouraging de-allocation of land and taking on the Neighbouring Authorities' unmet need have been received.</p>
<p>Policy DS3 - Sustainable Development Policy</p>	<p>The need for a Coal Mining Risk assessment in the eastern part of the city has been raised for both safety and environmental protection reasons. Some comments received regarding the lack of policy mention regarding reduction of crime through planning. No inclusion of Kersley in DS3 was raised.</p> <p>Some comments encourage more details to be included regarding the role of tilted balance. Comments received regarding more details about economic growth and tackling poverty. Low need for new housing and overprovision of PBSAs was raised.</p> <p>Some comments were raised praising the decarbonisation of the public transport. However, the issue of the Very Light Rail not being operational was brought up.</p>
<p>Policy DS4 - Masterplan principles</p>	<p>Some comments were received in favour of the allocations and comprehensive planning. Support received regarding the importance of green infrastructure provision in Masterplans and connectivity between Coventry City and Warwick District.</p> <p>Some comments called for the protection of the local context and design. An issue with the lack of masterplanning for Baginton Fields</p>

	and no mention of the Very Light Rail was raised. The need to safeguard existing utility infrastructure onsite was outlined in some comments. Concerns raised regarding transport access to Eastern Green. Some comments received regarding references to unmet employment and housing need. The idea of mini-masterplans for the University campus was brought forward.
Specific paragraph comments (non-policy)	Some comments raised regarding the use of an alternative method for the housing targets and its impact on DtC, encouraging the use the New Standard Method (NSM) instead.
Chapter 4 – Health and Wellbeing	
Policy HW1 - Health and Health Impact Assessments (HIA)	<p>Comments supporting the wording of the policy were received. An issue regarding the lack of an updated Health SPD was raised.</p> <p>Some comments received regarding the disproportionality of the HIA being required for major developments. An issue was raised regarding the references to an SPD within the Local Plan.</p>
Specific paragraph comments (non-policy)	Support and offer of collaboration received.
Chapter 5 - Jobs and Economy	
Policy JE1 - Overall Economy and Employment Strategy	<p>Stronger references to improving sustainable transport links were requested. Some comments raised the issue of employment land needs potentially being provided outside of Coventry’s boundaries in contradiction to the objectives set out in the policy. An issue regarding the lack of inclusion of Westwood Business Park as an allocated employment site was raised.</p> <p>Some comments received highlighting the need for site allocation for employment close to the boundaries agreed through SoCGs and MoUs, and a forward-looking evidence base to avoid underestimation of local need. The employment land needs figure was questioned, as it may be too low. Modification of the wording to reference the University of Warwick SPD was requested.</p> <p>Support of protection of existing employment sites and sustainability was raised. Some comments received in favour of the opportunity to cooperate. Support of the wording around sustainable technologies, alongside a request for minor modifications to support modernisation of sites were received. General support received</p>

	alongside a request for more explicit references around university contributions.
Policy JE2 - Provision of Employment Land and Premises	An issue was raised regarding the lack of a Green Belt review and unmet employment land need. Some comments received in support of protection of existing employment sites. The deliverability of sites was questioned. Concerns raised regarding Baginton Fields, requesting their de-allocation and protection. Lack of new allocations being proposed and lack of clarity regarding committed supply were questioned. Comments received regarding the need for MoUs. Comments outlining general opportunities regarding sites were brought forward.
Policy JE3 - Non-Employment Uses on Employment Land	General support received regarding the protection of existing sites with some minor modifications regarding the strengthening of the wording.
Policy JE5 - Industrial and Storage / Distribution Development	An issue was raised regarding lack of clarity as to whether the policy refers to local or strategic needs. Comments received regarding lack of sufficient provision of employment land and windfall not being a means of addressing projected needs. A concern was raised over the potential impact of B8 sites and a request for stricter wording was received. Lack of clarity due to a typo was pointed out.
Policy JE6 - Tourism/Visit or Related Development	A request was brought forward to reference University of Warwick in the policy.
Policy JE7 - Accessibility to Employment Opportunities	An issue was raised with a lack of explicit reference to active travel links to employment.
Policy JE8 - Location of Research and Development (R&D)	A request for bigger flexibility on university sites was received.
Overarching comments (non-policy)	Comments received raising an inadequate supply and deliverability of employment sites, the predicted employment need number being too low, and slow speed of development over the recent years.
Chapter 6 - Delivering Coventry's Housing Needs	
H1 - Housing Land Requirements	Comments considered that SM plus uplift not being used due to no sufficient demonstration of exceptional circumstances was not appropriate. An issue was raised over the approach limiting the

	<p>supply of affordable housing and diversity of the existing house stock.</p> <p>Comments outlined that there is insufficient evidence to demonstrate compliance with the DtC. An issue was raised calling for release of more sites from Green Belt. The Plan period was questioned, highlighting that a minimum 15 years from adoption is ensured.</p> <p>Concern was raised regarding the Plan period looking back 5 years being a manipulation of figures to avoid meeting the housing needs. Some comments urged that Coventry take some of Birmingham's shortfall and no historic lapse rate being provided was questioned. Some comments were received regarding the possibility of the windfall being higher than the allowance set out by the Council and lack of consideration of future trends of windfall delivery.</p> <p>Clarification requested regarding counting allocations, for example where a site is a carried forward allocation but also has consent or identified HELAA sites coming forward as windfall. Concern raised over lack of certainty around delivery of sites allocated in HELAA and deliverability of sites due to commitments with outline permission.</p> <p>Comments questioned whether it is justified to use two different methodologies for one Housing Market Area and sub-region.</p>
<p>H2 - Housing Allocations</p>	<p>Green Belt Review requested. Viability concerns of brownfield sites for both full net zero and fabric only policies raised. Deliverability and viability issues raised regarding Friargate, Walsgrave Hill Farm, Central police station and 12 existing allocated sites. Removal of sites deemed undeliverable was requested, including Walsgrave Hill Farm, Carlton Road, land at Mitchell Avenue, Durbar Avenue and Jadine Crescent.</p> <p>Request for a net figure for Spon End was received, as well as increasing of allocated capacity of the Keresley SUE. Objections to Whitefriars Car Park and Dale Building Tower Street received due to quantum of development sought and no plan heritage assessment done for the sites.</p> <p>Heritage considerations and heritage impact assessments requested for Walsgrave Hill Farm, Sandy Lane, Central police station, New Union Street Car Park, Allesley Hotel, Spon End, CCS, Friargate. Level 2 SFRA requested for Spon End. Concern raised regarding wording of H2:3 not being consistent with national policy.</p> <p>Amendment to the wording of "total dwellings" was requested, some comments requesting the change to be a "maximum", some to be</p>

	<p>“Assessed Capacity Number of Dwellings”. Comments questioned whether the allocated housing numbers have been deliberately inflated to justify avoiding the release of green belt land.</p> <p>Safeguarding of overhead line of the southern portion of Walsgrave Hill Farm requested. Concern raised over loss of playing fields and lack of an assessment at Mitchell Avenue and Baginton Field.</p> <p>Support received regarding allocations of least environmental value. Land promotion for the next local plan received.</p> <p>Comments supporting approval of Sandy Lane were received. Returning of sites, such as some parts of Keresley SUE, to the Green Belt was requested if they do not have planning permission. Concern raised over possibility of total housing being surpassed in Keresley SUE. Identification of grey belt sites requested. Release and allocation of sites in Green Belt (such as HELAA Ref. WES- 003-23) was sought by some comments.</p>
H3 - Provision of New Housing	<p>Lack of evidence to adequately justify requiring NDSS and no flexibility allowed in applying NDSS and M4 standards were brought up.</p> <p>Inclusion of a lead in time period for all the requirements coming into force and set out what it means for approved outlines and their RM submissions were requested.</p> <p>An issue was raised with referencing standards in SPDs and other Council documents like the transport strategy within the policy is against the PPG, as SPDs, which have not been through examination or viability checked are there to support policy and not to create it or to have the same status as policy.</p> <p>Comments outlined that point 7 on self-build and community led housing is repetitious and should be included in point 1. Definition of ANGST standards and a cross reference to the HMO DPD was requested.</p> <p>Amendments regarding provision of wheelchair accessible parking was requested to include eventualities in which providing 10% of units to full wheelchair standard could lead to a need of more than 5%.</p>
H4 - Securing a Mix of Housing	<p>Issues regarding lack of flexibility for proposals that would not fall under the exceptions in part 2 (sites that are unviable, small sites with constraints, etc.) were raised.</p> <p>Comments received regarding referencing the HEDNA, outlining that instead the mix should be specified in policy.</p>

	There was concern over the impact of BNG costs not being considered.
H6 - Affordable Housing	<p>Amendment requested to add in a clarification regarding the affordable housing provision for PBSA development being subject to viability. Concern was raised over 1ha site threshold for the AH requirement and excluding areas of the city from the requirement.</p> <p>Inclusion of the Building Safety Levy in the policy was requested. An issue was raised with referencing standards in SPDs and other Council documents like the transport strategy within the policy is against the PPG, as SPDs, which have not been through examination or viability checked are there to support policy and not to create it or to have the same status as policy.</p> <p>Justification and deliverability of the policies were questioned in regard to downgrading of contributions sought by EM11 if they would enable more affordable housing. Concern raised regarding delivery of the quantum of affordable housing.</p>
H7 - Gypsy and Traveller Accommodation	Help with an allocation from another council was received as an opportunity to fulfil DtC. Inclusion of secure by design principles was requested.
H8 - Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels	Concern raised regarding possible conflation of Older Persons Housing (OPH) and M4, as well as lack of justification for M4(2) and M4(3) requirements for OPH. Concern raised regarding 10% of dwellings to be M4(3). Clarification was requested regarding M4(3) standards.
H9 - Residential Density	Clarification requested regarding whether the density figures are maximums or minimums. Concern raised regarding reliance on brownfield sites potentially causing under-provision.
H10 - Student Accommodation	<p>Concern raised over clarity of the policy. The level of change of use applications from PBSA and the new uses being approved was questioned. An issue was raised stating that evidence should be commissioned to determine whether the city needs the alternative accommodation being proposed.</p> <p>Some representations considered the monitor and manage approach to not be appropriate given the level of oversupply and a more pro-active stance being required.</p>

	<p>Comments received stating Westwood Business Park should be retained to help address the Council's employment need. Amendment requested defining "immediately adjacent".</p> <p>Justification for the locational based approach was requested. Some comments received stating that campus and immediately adjacent is too tightly drawn and the evidence does not justify the high test of requiring exceptional circumstances outside these areas. Request received stating that the campuses should be shown on the proposal's map.</p> <p>Concerns raised stating that requirements to be flexible / adaptable in design are not justified and overly burdensome and costly for developers. Some comments stated that points 3 onwards would not be appropriate for PBSA provided on campus, especially the flexibility to be converted to C3 housing and dictation on the number of studio and cluster flats. Clarification on points 3 onwards was requested – point 3 and 4 accept off campus only. Concerns were raised regarding giving local plan status to SPDs.</p>
H11 - Homes in Multiple Occupation (HMOs)	A cross reference to the HMO DPD was requested. Concern raised over the DPD not covering the whole city. A request was received regarding inclusion of the Longford Ward in Article 4.
H12 - Build to Rent	Bespoke accommodation arrangement requested by the university to meet staff and student needs. A request was received to re-insert references to opportunities for Co-Living and Build to Rent into the policy.
H13 – Co-living	An issue was raised regarding co-living being a sui generis use and onsite affordable housing not being applicable. Concern raised regarding the 25% AH requirement and minimum unit sizes unnecessarily restricting the market. Kitchen size and sharing capped at 8 people was considered to be an issue going against big communal arrangements. Onsite personnel being required was raised as an issue. Secure by design was requested.
Overarching comments (non-policy)	Comments received arguing that the total housing figure should be 35,693 and should be uplifted by 4,200. Some comments received stating the windfall allowance should be higher and that some allocations should be removed. A site was put forward within the Green Belt.
Chapter 7 – Retail and Centres	
Policy R2 - Coventry City Centre –	<p>The addition of further detail in the policy regarding designing out crime and an evening policy was requested. Some comments regarding focusing on retail frontages were received.</p> <p>The support of green and blue infrastructure was received.</p>

Development Strategy	
Policy R5 - Retail Frontages and Ground Floor Units in defined centres	A request for the addition of a specific reference regarding gambling and alternative financial services was received.
Policy R6 - Restaurants, Bars and Hot Food Takeaways	A request for the addition of a specific reference regarding crime and fear of crime in relation to hot food takeaways was received.
	Chapter 8 – Communities
Policy CO1 - New or improved social, community and leisure premises	General support received with a request for amended wording, changing “education” to “school”.
Policy CO2 - Re-Use of or Redevelopment of Facilities	General support received with a request for amendments regarding a bigger flexibility of land use for healthcare services.
	Chapter 9 – Green Belt and Green Environment
Policy GB1 – Green Belt	Concerns raised regarding meeting Duty to Cooperate due to a lack of SoCGs and MoUs and public information regarding partnerships. An issue was raised with the lack of a Green Belt Review, inclusion of a Rural Exception Site Policy and encouragement to release land from the Green Belt was received. Some comments encouraged returning some land to Green Belt, such as part of the Keresley site.
Policy GB2 - Safeguarded Land in the Green Belt	<p>Comments encouraged the development of safeguarded land at Westwood Heath alongside Warwick District Council. Concern raised over safeguarding land with no development starting and encouragement to return it to the Green Belt. Some comments encouraged releasing land in South Coventry from the Green Belt.</p> <p>A concern was raised regarding the housing crisis and housing land allocation being postponed until a future Local Plan update. Some comments encouraged the provision to release land at Westwood Heath without a review of the Local Plan once it is considered for development by the SWLP.</p>

	<p>Comments received in support of no decisions being made with regards to allocation of land on the southern boundary of Coventry before the SWLP reaches an advanced stage.</p>
Policy GB3 - Local Green Space	<p>A request was received for clarification on the policy's interaction with BNG. Amendment proposed to exclude land at Gibbet Hill Road from the Local Green Space designation.</p> <p>General support received, with additional support extended to Local Green Spaces being identified on the Policies Map and inappropriate development not being permitted without the existence of special circumstances.</p>
Policy GE1 - Green and Blue Infrastructure	<p>A request was received for clarification on the policy's interaction with BNG. Amendments were proposed to include an explicit reference to support the Green and Blue Environmental Agenda and raises the need for a specific policy capturing the intent to deliver public realm changes along Cox Street. Concern raised over the Green and Blue Infrastructure evidence being considered out of date. Expansion on environmental principles to better protect trees and habitats was proposed.</p> <p>Support received regarding de-culverting hidden watercourses across the City Centre. Strong support received regarding provision, protection and enhancement of green and blue infrastructure, as well as green infrastructure being used as a way of adapting to climate change. References to Water Framework Directive were supported.</p>
Policy GE2 - Green Space	<p>A concern was raised regarding a possible conflict between policies GE2 and GE3. The allocation of H2:19 and JE2:3 and the possible loss of playing field land were raised as a concern. A request was received for clarification on the policy's interaction with BNG.</p> <p>General support received. Support received regarding de-culverting hidden watercourses across the City Centre.</p>
Policy GE3 - Biodiversity, Geological, and Landscape Conservation	<p>A concern was raised regarding a possible conflict between policies GE2 and GE3. Clarification requested regarding protection of SSSIs from development, and differentiation between the mitigation and BNG delivery hierarchies. An issue was raised regarding the lack of reference to Local Wildlife Sites and Potential Local Wildlife Sites, a request to add more ambitious wording was received.</p> <p>A request was received regarding the exclusion of a reference to bird and bat boxes and replacing it with swift bricks instead. A request for amending the wording to allow exceptional permission for development to maintain and improve the railway. A request to reference the projects to improve public realm undertaken by the</p>

	<p>university was received. Amendments requested to require 20% BNG and deliver a rich mix of habitats.</p> <p>A concern was raised regarding the wording of the policy implying that the BNG should be over 10% and its influence on viability, and delivery of affordable housing.</p> <p>General support received. Support received regarding the reference to Local Nature Recovery Strategies, alongside a request for more detail.</p>
Policy GE4 - Tree Protection	<p>General support received.</p> <p>Amending the wording to allow exceptional permission for development to maintain and improve the railway was requested. Clarification was requested on the policy's interaction with BNG. Stronger mitigation strategies were requested, including giving weight to the LNRS and buffering standards. A Tree Canopy Target was requested to be added alongside a 30% target for land in nature recovery.</p>
Chapter 10 – Design	
Policy DE1 - Ensuring High Quality Design	<p>Comments received requesting modifications regarding car parking requirement in developments and cycle parking. Additionally, the prioritisation of local building materials in the policy was requested. Issues were raised with lack of reference to designing out crime and the status of SPDs. The needs of younger part of the population were highlighted.</p> <p>Support received regarding ensuring adequate waste storage and collection; the policy promoting safety; sustainability and green infrastructure.</p>
Policy DE2 - Delivering High Quality Places	<p>Comments received in favour of public art, however requesting a modification regarding the payment of a commuted sum in case the art is maintained privately. Support received regarding meanwhile uses, however a request for clarification regarding use investigation was also received.</p>
Chapter 11 – Heritage	
Policy HE1 – Conservation Areas	<p>Conservation Area review requested.</p>
Policy HE2 - Conservation and Heritage Assets	<p>General support received.</p> <p>Comments requesting modifications regarding designing out crime were received. Concerns raised regarding the sustainability of reusing heritage sites.</p>

Policy HE3 - Heritage Park – Charterhouse	General support received alongside a request of modification to mention renaturalisation of the river Sherbourne. A request to update the map has been received.
Policy HE4 - Archaeology	General support received. Minor modifications requested regarding wording relating to previously unrecorded archaeology.
Overarching comments (non-policy)	Request to review the conservation area appraisal process received and an issue raised regarding the reason why the entirety of the canal has special interest.
Chapter 12 – Accessibility	
Policy AC1 - Accessible Transport Network	Support received for active travel and improvement of connectivity. A reference to LTN 1/20 and safe travel was requested. Additionally, a request to add a reference to support active travel training was received alongside the initiative to collaborate with the university.
Policy AC2 - Road Network	<p>Concern raised regarding sustainable development of Baginton Fields, possible congestion and lack of active travel. Clarification requested regarding whether the required provision of EV charging is based on the availability of viable means of power.</p> <p>Support received for the requirement for the provision and integration of intelligent mobility infrastructure.</p>
Policy AC3 - Demand Management	<p>Clarification requested regarding updates to mode shift targets and the definition of micro-mobility. Concern raised regarding the continuation of sustainable travel use once Mobility Credits expire; comments encourage high quality active design. Concern raised regarding car parking provision.</p> <p>Support received regarding encouragement of sustainable travel. Offer of collaboration received regarding a nuanced approach to parking provision, availability of EV charging and cycle hubs.</p>
Policy AC4 - Active Transport Provision including Walking, Cycling and Micro Mobility	<p>Amendment requested to include direct and desirable routes, and a reference to desirable minimum widths in LTN 1/20. A reference to safe travel and e-scooters/e-bikes was requested. Amendment requested to specify clear cycle routes at the edge of the ring road. A concern was raised regarding impact on local habitats.</p> <p>Support received regarding further detail to cycle parking standards, and high priority being placed on walking and cycling; advantages of active travel, such as health benefits, reduced congestion and pollution.</p>
Policy AC5 - Bus, Demand Response Transit and Rapid Transit	<p>A request was received to add a clear definition of mobility hubs, a reference to safe travel and the Gigapark as part of the Very Light Rail route.</p> <p>Support received regarding the inclusion of Very Light Rail, promotion of sustainable transport and demand for improved accessibility in</p>

	the policy. Information about sharing the survey results regarding active travel was received from the university alongside an offer of collaboration.
Policy AC6 - Rail	<p>Adding additional guidance, such as the West Midlands Strategic Advice 2022, was requested. A concern regarding not listed transport projects arising and a request to add that the list may be subject change were received. Adding a reference to safe travel was requested.</p> <p>Support was received regarding the ambition to improve rail and rail station connectivity on a regional and local scale, and the impact on reducing carbon emissions.</p>
Policy AC7 - Freight	Support received regarding parking and facility provision for HGVs, promotion of sustainable delivery methods, as well as ambition to reduce HGV traffic. Concerns were raised regarding air quality, HGV movements, poor public transport and its impact on job connectivity, traffic and pollution impacts tied to B8 sites and cross-boundary applications. Further concerns were outlined regarding lack of mention of possible mitigation strategies and references to the WMSESS threshold of 25ha.
Overarching comments (non-policy)	A request to add a reference to LTN 1/20 was received. Support towards Advanced Stop Lines received alongside concern that these would not be sufficient on their own. Support was received regarding pedestrian improvements and prioritisation of active travel.
Chapter 13 – Environmental Management	
Policy EM1 - Planning for Climate Change Adaptation	<p>General support received regarding creating energy from waste and ambitious goals in order to reach net zero.</p> <p>Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date.</p>
Policy EM4 - Flood Risk Management	General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation.
Policy EM5 - Sustainable Drainage Systems (SuDS)	A request was received for clarification on the policy's interaction with BNG. Including a reference to the protection of controlled waters in the context of SuDS was suggested.
Policy EM6 - Redevelopment of Previously	<p>Concern raised regarding the impact of the policy requirements on viability of development.</p> <p>Support received regarding references to the Water Framework Directive.</p>

Developed Land	
Policy EM7 - Air Quality	<p>A suggestion to include walking and cycling as part of low-emission transport was received.</p> <p>Concern raised regarding compliance with the Air Quality SPD being a Local Plan policy requirement.</p>
Policy EM8 - Waste Management	<p>Support received regarding consideration of waste management land suitability, prioritisation of waste prevention, recycling and safeguarding of existing waste management sites.</p> <p>Suggestion received regarding assessing need for the development of additional waste management capacity within the Coventry area over the Plan period.</p>
Policy EM10 - Non Mineral Development in Mineral Safeguarding Areas	<p>Request received to remove references to the Coal Authority in the policy and instead add signposting to its Permitting and Licensing teams, and the need for an Incidental Coal Agreements to remove coal from site during development works.</p>
Policy EM11 - Energy Infrastructure	<p>Concern raised regarding the impact of the policy requirements, including high standards relating to energy infrastructure, on viability of development. Additionally, it was questioned whether the evidence justifies the ambitious standards. The Written Ministerial Statement (2023) was raised in some of the representations, pointing out that there is no expectation to set local energy efficiency standards going beyond current or planned building regulations. Possible conflict with the definition of regulated embodied carbon outlined in policy EM1 was highlighted. Potential conflict of part 8(a) with GDPR was raised.</p> <p>Support received regarding the requirement to include significant renewable energy generation in new developments, and community energy schemes.</p>
Policy EM12 - Reducing operational carbon in new build non-residential development	<p>A request for more flexibility regarding specific measures for improvements on Part L emission rates. More detail on methodology was requested.</p> <p>Comments of support for mutual benefit received.</p>
Policy EM13 - Overheating in new buildings	<p>Some observations regarding site constraints and possible differences in effectiveness hierarchy were received. Concerns raised over the acceptability of specific assessments.</p>

Policy EM14 - Embodied carbon and waste	<p>Support received regarding minimisation of waste and prioritization of waste prevention and reuse.</p> <p>Concern raised regarding a single target being potentially under ambitious or overly challenging depending on the development; and the requirement for a whole-life carbon assessment being required for all major developments being disproportionate. Clarification was requested regarding how to demonstrate compliance with planning for a building's end of life.</p>
Policy EM15 - Noise	Observations received regarding expected amenity levels being different in various parts of the city.
Overarching comments (non-policy)	Offer of cooperation received to further green the city. A request to add a policy to safeguard against development where a supply of minerals is present.
	Chapter 14 – Coventry City Centre
Policy CC1 – Coventry City Centre Development Strategy	<p>An amendment to include references to the reduction of crime and fear of crime was received.</p> <p>Supportive comments received regarding sustainable drainage and the Water Framework Directive.</p>
	Chapter 15 - Infrastructure Delivery, Implementation and Monitoring
Policy IM1 - Developer Contributions for Infrastructure	<p>Comments received raising issues with the infrastructure contributions interfering with the provision of affordable housing. Specific references to crime, safety and emergency services, as well as health infrastructure and funding were requested. Adding explicit references to monitoring and housing supply was requested.</p> <p>Supportive comments received regarding provision of necessary infrastructure.</p>
Overarching comments (non-policy)	Issue raised with the monitoring method. Comments received regarding the necessity of key milestones for water waste infrastructure, foul drainage hierarchy and the Water Company consultations in amber and red areas.
General comments (not submitted as policy specific)	<p>Some comments were received outlining that the proposed housing numbers are too low, with some arguing the opposite. Addressing 35% uplift and lack of a Green Belt Review, as well as using a non-standard calculation method; proceeding under transitional arrangement and raising Plan period, and Duty to Cooperate concerns were highlighted issues. Additionally, attention was brought to new government guidance regarding BNG and LNRS, and their potential impact on the Local Plan.</p> <p>Comments regarding need for further addressing the needs of vulnerable communities, fighting against climate change and flooding. More focus should be put on attracting new industries,</p>

	<p>ensuring affordability and improving granular infrastructure, as well as congestion, especially when it comes to new developments. Infrastructure planning should be prioritised, including healthcare, addressing road congestion and school capacity issues.</p> <p>Arguments were raised towards releasing more land from Green Belt, however arguments for returning land to Green Belt were also made. Review of Longford's conservation status was requested. It was requested that a new policy CC2 is created. Sustainable development of universities noted. Some comments were put forward regarding concerns in relation to consistency with the national heritage policy, i.e. ensuring that brownfield land is prioritised for redevelopment for employment purposes.</p> <p>Some sites were put forward for promotion. Active travel being strengthened by policies was noted and approved with an encouragement towards changes to phrasing in order to put greater priority for walking, cycling and public transport was noted. The opportunity for growth promotion is encouraged by some representations. Positive comments were received regarding the soundness of the plan. Proposals to improve health provision were regarded positively and close collaboration with the NHS ICB was encouraged. Public transport links to healthcare services and the importance of non-physical aspects of health improvements (air quality, green spaces, etc) were highlighted.</p> <p>It was proposed that policy GB1 should be split into two parts and a list of sites should be removed, however the brownfield first approach should remain.</p> <p>Concern was raised over the Eastern Green SUE, naming of "protected green spaces", possibility of areas of high ecological importance being built on, oversaturation of student accommodation, ambitious active transport proposals and possible boundary review for Allesley Parish not being acknowledged.</p> <p>Additionally, lack of consideration of wildlife, green infrastructure and biodiversity was objected to. Objections received regarding taking Warwickshire's unmet housing need if Coventry's Green Belt would be used. Overprovision of housing in Eastern Green and Keresley SUEs, inadequate drainage system for the Richborough Estates as well as lack of a masterplan for Keresley and access systems to the SUEs were raised as concerns.</p>
Appendices	Concern raised over an Appendix referencing NPPF 2023. Issue raised over the lack of ambitiousness for cycle parking; car parking

	<p>ratios with dwellings; and monitoring not being effective. An issue was raised with too much car parking being provided for staff. It was questioned if the provision of adequate healthcare infrastructure would be sufficient.</p> <p>Cooperation to better understand and clarify points in the Infrastructure Development Plan was offered.</p>
Sustainability appraisal key issue summary	
Sustainability Appraisal	<p>Concerns were raised regarding whether the SA sufficiently considers the impact of the chosen housing requirement, site allocation strategy and the failure to deliver the housing need; as well as failure to consider a dispersed housing strategy. Some concerns were raised regarding the evidence; consideration of environmental impacts on Local Wildlife Sites and Potential Local Wildlife Sites and allocation of sites in Green Belt.</p> <p>Some issues were raised regarding effective protection of sustainability on allocated sites and provision of BNG, as well as reviewing brownfield sites for employment use.</p> <p>Some observations were received regarding the need for traffic control measures. A Green Belt Review and subsequent revised SA were requested.</p>
HRA Screening Report	<p>Some representors have raised issues with the accuracy of the report, including use of terms, hydrological links with the Severn Estuary, and main rivers. Some representors provided general comments in support of the report's conclusions regarding Conservation and Protection areas.</p>