



# **Report to Coventry City Council**

**by Nigel Payne BSc (Hons) DipTP  
MRTPI MIMgt**

The Planning Inspectorate  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN  
☎ 0117 372 8000

**Inspector appointed by the Secretary of State for  
Communities and Local Government**

Date 11 February 2010

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**INTERIM REPORT ON THE EXAMINATION INTO THE COVENTRY CORE  
STRATEGY DEVELOPMENT PLAN DOCUMENT REGARDING THE CITY  
CENTRE ONLY.**

Document submitted for examination on 30 June 2009

## **Matter 5 - City Centre [Policies SG19 and SG20]**

### ***Issue 1 – Does the CS provide suitable guidance and policies for the improvement of the city centre and the preparation of a future Area Action Plan [AAP] consistent with national guidance in PPS 6 [now PPS 4] and regional policies ?***

- 2.1 No one disputes that Coventry city centre urgently needs new investment to improve its retail offer and range of other uses, in order to properly fulfil its sub-regional role and make its full contribution to the local and regional economies. Given the present form and layout, largely deriving from the post WW2 rebuilding of the city, it is also common ground that a major redevelopment scheme or schemes, such as outlined in the recent Coventry City Centre Masterplan “the Jerde Masterplan” (CS4) for the current retail centre, is required to achieve the desired transformation.
- 2.2 Amongst other public bodies, Advantage West Midlands (AWM) confirm that there is a consensus of sub-regional support for an expanded city centre to focus retail, office, educational, cultural, leisure and new housing growth and improve its overall prosperity and economic contribution, given the current under-performance. This is reinforced by identification as an “Impact Investment Location” (IIL) and regional funding priority, including a significant programme of city centre regeneration. It is also supported by an emerging City Centre Area Action Plan (CCAAP) that incorporates the Jerde Masterplan (CS4) for the redevelopment of the retail centre.
- 2.3 In common with most others who have commented, I am satisfied that the CS sets out an appropriate overall vision and framework for the essential changes to the city centre. It also takes full account of the key messages arising from public consultation in relation to the aspirations of the local community. In my view, it is consistent with both the previous PPS 6 and the relevant elements of the RSS, as well as the new PPS 4, and provides an appropriate lead for the subsequent CCAAP that will “put the flesh on the bones” in terms of site specific details.
- 2.4 In particular, the anticipated levels of new retail space, offices and housing units identified in the CS over the plan period should help enable significant redevelopment opportunities to come forward, on an economically viable basis, in the expanded city centre. With regard to housing, there has been

no evidence brought to my attention to cast any material doubt on the Council's estimate that around 6,000 new dwellings can be provided across the central area over the full timescale of the CS. Through the identification of sites in the AAP, the draft of which has now been published, I consider that there is a reasonable prospect at least of this element of the city's new housing delivery being achieved as proposed.

- 2.5 Overall, I therefore conclude that the CS provides suitable guidance and appropriate policies for both the improvement of the city centre in general and the emerging AAP in particular that are consistent with national advice in former PPS 6 and the relevant policies of the RSS. Although prepared before the publication of the new PPS 4 – "Planning for Sustainable Economic Growth" [Jan 2010], I am also content that the policies and proposals of the CS for the city centre are consistent with the purposes and provisions thereof and should help significantly to improve the economic performance of the city as a whole.
- 2.6 The CCAAP will clearly need to address flood risk issues in a Level 2 SFRA in greater detail than has been the case so far in the Level 1 SFRA for the CS, including in relation to the proposals for the Swanswell area. Nevertheless, and particularly in the absence of any major problems identified to date, I am satisfied that this is appropriate in all the relevant local circumstances, rather than being needed before the AAP is started for example.
- 2.7 Similarly, concerns expressed by the EA regarding increased loads on the foul sewer network from more new housing in the city centre relate to matters of relative detail, not appropriate or necessary to be dealt with in a CS, particularly where an AAP for the relevant area is already well underway. Moreover, I see no real need to add specific references to "enhancing the natural environment" or "including sustainable design principles" into policy SG19, as it is essentially an enabling policy for the more detailed proposals in the AAP and relevant national guidance expects that such matters would be taken into account in any event.
- 2.8 In the light of all of the above I consider that both policies SG19 and SG20, together with their supporting texts, are sound and require no material changes. However, four minor wording amendments would assist clarity and should be incorporated into the final adopted versions. Firstly, a reference to Coventry's Cultural Strategy 2007 – 2017

(CS.S6.21) should be added to the Relevant Evidence Base on p.62. Secondly, all the evidence, including the SCS 2008 update (CS.S3.1) suggests that a need for Shopping Expansion Areas will arise outside the present Primary Shopping Area (PSA) within the plan period. Thus, the first part of the first sentence of para 6.95 is unnecessarily cautious and should be deleted so that it starts "The most suitable.... ". This will also ensure that no potential confusion about these proposals is taken forward into the CCAAP.

- 2.9 Thirdly, the second bullet point of that para should also relate to the PSA and not just the Precinct Quarter, for obvious reasons, and should be changed accordingly. Finally, the first sentence of para 6.96 need not equivocate about the inclusion of peripheral residential areas and leisure uses and "may" should therefore be changed to "will" to assist the CCAAP and be consistent with the use of language elsewhere in this section.

***Issue 2 – Is the proposed extension of the city centre boundary soundly based and justified by the evidence in terms of potential impact on the rest of the city centre ?***

- 2.10 The overall strategic importance of making significant improvements to the city centre and the targets for new retail, offices and housing expected to be met there both help to provide a justification for the expansion of the city centre beyond its currently defined area. Moreover, the constraints imposed by the rail line to the west, the need to promote regeneration in the north, accommodate major developments by Coventry University to the east and "break down" the physical, visual and perceptual barrier of the Ring Road all clearly contribute to defining where such expansion should occur.
- 2.11 In such circumstances and particularly in the absence of any firm evidence indicating otherwise, I am entirely content that the Council has identified an appropriate new boundary for the city centre and that, in the light of the proposals in the emerging CCAAP, the extensions are likely to complement, rather than harm, the necessary and appropriate redevelopment of the city centre as a whole.

***Issue 3 – Should the policies include targets derived from the RSS for new retail and/or office floorspace and identify appropriate locations ?***

2.12 I note that the Council would have no objection to the specific inclusion of the RSS targets for new retail and office floorspace in policy SG19. However, any such change is not now likely to assist in the preparation of the CCAAP, which is already well underway. Had it been otherwise the inclusion of specific figures might have given some particular directions for the AAP to follow, but this no longer seems necessary and has therefore, to all intents and purposes, been overtaken by events.

2.13 I am therefore content that the relevant targets and more detailed figures should remain in the supporting text of the policy in this instance. Bearing in mind the considerable progress made to date on the more detailed CCAAP, I also endorse the Council's position that the identification of suitable locations, e.g. for new offices, is best dealt with in the former rather than the higher level CS, where matters of greater detail, including flood risk, can be examined more closely and on a sequential or comparative basis, if necessary.

***Issue 4 – Will the monitoring indicators for centres, offices and retail be effective ?***

2.14 This issue is dealt with under the main section on monitoring.

**List of Changes**

- ❖ Add "Coventry's Cultural Strategy 2007 -2017" to the Relevant Evidence Base on p. 62.
- ❖ Delete "If any further sites beyond the Primary Shopping Area are required" at the start of para 6.95.
- ❖ Replace "Precinct Quarter" with "Primary Shopping Area" in second bullet point of para 6.95.
- ❖ Replace "may" with "will" in first line of para 6.96.

*Nigel Payne*

Inspector