

For the URGENT attention of the Inspector

ANNEX 1 of the WMCA supplementary submission of 20.7.16

No.	OPTION	PROPOSALS
1	Old Registry Office (VACANT – since March 2015)	(a) “retention” of site to meet community needs (b) interim use on peppercorn rent until building is demolished
2	Carfax Site	“allocated site” within an “integrated approach” for provision of “community facilities” and/or of “shared space” – “not compromised due to limited site availability”
3	Cattle Market	“allocated site” within an “integrated approach” for provision of “community facilities” and/or of “shared space” – “not compromised due to limited site availability”
4	Silver Hill	“allocated site” within an “integrated approach” for provision of “community facilities” and/or of “shared space” – “not compromised due to limited site availability”
5	WCC suggestions	The City Council to come up with suggestions pursuant to the provisions requiring their obligation <u>to allocate a range of suitable sites</u> for the community – <u>not compromised</u> due to limited site availability

ENABLING PROVISIONS:

- **NPPF; page 7**

Obligation to: *“allocate a range of suitable sites to meet...cultural, community ...”*

AND

*“...**not compromised** due to limited site availability.”*

- **NPPF; page 17**

- *plan positively for the provision and use of **shared space**, community facilities...*
- *guard against the unnecessary loss of...the **community’s ability to meet it’s day-to-day needs***
- ...
- *ensure an **integrated approach** to considering the location of housing, economic uses and community facilities and services*

- **CP6; 7.4.1:**

*“Given the dispersed nature of the District, the **provision and retention** of local services and facilities is important, especially those which provide opportunities for communities to access them without having to travel excessive distances.”*

We have **identified particular community needs** around BME groups.

Clearly the enabling provisions for the Community means that the City Council must:

1. retain existing facilities
2. make provision for services and facilities within new developments
3. integrate approach with commercial, residential and community matters
4. allocate a range of suitable sites
5. safeguard against loss of communities day-to-day needs
6. plan positively for shared space

CONCERN:

We have a significant concern that once the Inspectorate's examination process is concluded that our City Council may not properly plan, develop or allocate facilities to the Community within the City Centre.

JUSTIFICATION:

The WMCA met with the City Council in November and December 2015 and highlighted that they had been wrong in its omission of "community". In requesting meetings with our City Council, we trusted the various Heads of Departments to treat this matter seriously.

We therefore took their undertakings to us in good faith, that they would rectify the exclusion of Community in the LPP2 document. We reasonably assumed that all parties involved within the planning, development and allocation process would be briefed accordingly. We also understood that they would do so with a sense of urgency, given their significant omission and our urgent needs within the City Centre.

However, some 8 months later, we would draw the Inspectorate's attention to the fact that on-going Cabinet and Overview and Scrutiny Committee meetings, whilst the Inspector was conducting the Hearings, appear to have still not been updated with this modification to include "community" within the LPP2 documentation.

Presumably Community considerations were similarly omitted from briefings and instructions to Grant Thornton, Vail Williams and MACE – at cost.

We take this to be a significant and serious matter, which is why we suggest below proposals to rectify this significant exclusion of BME groups going forwards.

EVIDENCE:

- Minutes of Cabinet meeting (15.7.16)
- Minutes of Overview and Scrutiny Committee meeting (18.7.16)

REQUEST TO INSPECTORATE

In line with the Inspector asking us specifically for what we want, we have submitted some proposals as possible recommendations that the Inspector may consider appropriate below on an evidenced, reasonable, realistic and consistent bases.

• **RECOMMENDATION 1:**

That the word “community” from LPP2 is reinserted as a clear recommendation and modification to the City Council, that it redrafts this into the LPP2 documentation.

• **RECOMMENDATION 2:**

That the City Council provides briefings on what is meant by “community” considerations to:

- Cabinet
- Overview and Scrutiny Committee
- Third party professionals and advisory bodies

• **RECOMMENDATION 3:**

That the City Council fully involves “community” and especially BME groups in order to facilitate their active participation in all planning, development and allocation of sites within the City Centre.

The WMCA requests that the Inspector consider the above, or any such similar provisions that the Inspector feels appropriate, to rectify the position going forwards.