



**Development Plan Document
(DPD)
Publication Stage Representation
Form**

Ref:

(for official use)

Name of the DPD to which the representation relates **Core Strategy****Please return to Coventry City Council by 7th May 2009**

This form has two parts -

Part A—Personal Details

Part B—Your representation (s) Please complete a separate sheet for each representation you wish to make.

PART A

1: Personal Details*

2. Agent details (if Applicable)

* If an agent is appointed, please complete on the Title, Name and Organisation boxes below

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Max
Last Name	<input type="text"/>	Whitehead
Job Title (where relevant)	<input type="text"/>	Planner
Organisation (where relevant)	JS Bloor (Tamworth) Ltd	JS Bloor (Services) Ltd
Address Line 1	Calico Business Park	Ashby Road
Address Line 2	Sandy Way	Measham
Address Line 3	Amington	Swadlincote
Address Line 4	Tamworth	Derbyshire
Post Code	B77 4DS	DE12 7JP
Telephone number	<input type="text"/>	01530 270100
Email Address (where relevant)	<input type="text"/>	max.whitehead@bloorhomes.com

Part B—Please use a separate sheet for each representation

Name of organisation

3. To which part of the DPD does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant YES NO

4.(2) Sound YES NO

If you have entered NO to 4.(2), please continue to Q5. In all other circumstances, please go to Q6

5. Do you consider the DPD is unsound because it is not

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments

Please see attached document.

Continue on a separate sheet as required

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible

Please see attached document.

Continue on a separate sheet as required

Continue on a separate sheet as required

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be made at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

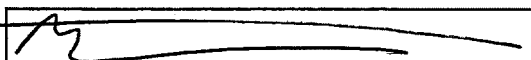
Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral examination, please outline why you consider this to be necessary:

The fundamental nature of our concerns with the document require discussion at the examination

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

Signature



date

7th May 2009

Policy SG7: Provision of New Housing and Table 3

1. Policy SG7 and Table 3 allocates a number of urban sites and safeguards six sites currently in the Green Belt for residential and mixed use development. The Council's recognition that the exceptional circumstances¹ exist to warrant the review of the current Green Belt boundaries is welcomed.
2. Consequentially we also support the principle of allocating strategic sites and identifying land to be removed from the Green Belt and safeguarded for future development in the Core Strategy.
3. However we have serious concerns as to the nature of the Council's approach to this exercise.
4. Firstly we would also question the allocation of a number of sites identified in the Core Strategy. It is considered that the allocation of a large proportion of the sites should be deferred to a 'Site Allocations' type DPD or Area Action Plans given their non-strategic nature.
5. PPS12 provides clear guidance as to the identification of strategic sites in Core Strategies at paragraphs 4.6 and 4.7. In particular, it states that the adoption of Core Strategies should not be held up by the inclusion of non-strategic sites. Whilst no guidance is provided as to what a 'strategic' site is, we do not consider that an allocation of 20 dwellings² can be considered "**central to the achievement of the strategy**" (PPS12 paragraph 4.6).
6. Moreover, it is not apparent from the submission document how the sites proposed for allocation and safeguarding have been selected, what alternative sites were assessed, and why the alternative sites have been discounted. It is therefore difficult to have confidence that the Core Strategy, by proposing the allocation of certain sites, is justified in accordance with paragraph 4.36 of PPS12.
7. In terms of the six sites proposed by the Council for removal from the Green Belt, it would appear that the Council have restricted their search to the 'least constrained parcels' of Green Belt land identified in the Coventry Joint Green Belt Study (SSR Planning, January 2009).

¹ As required by PPG2 paragraph 2.6.

² Table 3 - Site 30 – Carlton Road / Old Church Road.

8. We are of the view that this approach fails the tests of soundness for the reasons set out below.
9. According to the Council's figures the shortfall between the capacity of available urban land (22, 760) and the emerging housing requirement (33, 500) is 10, 740 dwellings. Given the extent of the shortfall and the anticipated availability of Green Belt land in Coventry it is surprising that only capacity for 3750 dwellings has been identified, with 7000 to be found in Nuneaton and Bedworth and Warwick Districts. The actual level of available Green Belt land is not known because the Council's SHLAA also restricts itself geographically in line with the 'least constrained parcels' identified in the Joint Green Belt Study – the Core Strategy inspector will need to draw his or her own conclusions as to the adequacy of this approach.
10. As a consequence there is a significant reliance on sites beyond the administrative boundary of Coventry. There does not appear to be any provision or commitment in the Core Strategy (or in other local development documents scheduled in the Council's local development scheme) for joint working with Nuneaton and Bedworth and Warwick Districts in order to facilitate the delivery of these 7000 dwellings.
11. In order to ensure that as far as is possible the Council have greater control over the delivery of its housing requirement we would have expected the Council to seek to maximise the provision of housing within its own administrative boundary.
12. In doing so the Council would need to have undertaken a more sophisticated assessment of the Green Belt boundaries and all of the available land within the administrative boundary of Coventry rather than limiting the search to the 'least constrained parcels' identified in the Joint Green Belt Study.
13. PPG2 sets out national policy with regard to Green Belts and offers guidance to local authorities who are reviewing Green Belt boundaries. As indicated above the exceptional circumstances required by PPG2 to necessitate Green Belt review are in place. PPG2 goes on to state at paragraph 2.8 that revised Green Belt boundaries:

“should be carefully drawn so as not to include land which is unnecessary to keep permanently open”

Effectively what is required in these circumstances is a detailed review of Green Belt boundaries to assess whether all of the land currently in the Green Belt is required to remain so. This does not appear to have occurred.

14. The parcels of land set out in the Joint Green Belt Study are of significant scale. This results in constraints being associated with particular sites within the broad parcels, which in reality do not effect them. This somewhat broad-brush approach has unjustifiably excluded certain smaller sites from consideration. Such sites can make a valuable contribution to the pool of land available to the Council to meet its housing requirements.
15. For example, the Chestnut Nurseries site off Brown's Lane, Allesley (SHLAA reference 303) is located adjacent to the urban edge and is approximately 2.77ha. This site is located within parcel C17D which is over 13, 000ha in size. Parcel C17D was taken forward for 'further detailed study' in the Joint Green Belt Study (along with other parcels which "**do not contribute as significantly**" as other parcels to the Green Belt³) although it was not identified as a 'least constrained parcel' largely due it being of high landscape value.
16. However the Chestnut Nurseries site cannot be considered of high landscape value given that it is largely covered in structures and hardstanding, is physically well contained by strong boundary features. The site is well suited to residential development being small scale, previously developed and in a sustainable location. It is not necessary to keep this land permanently open in a Green Belt context because it is not open in the first place.
17. The overlooking of this site and potentially other such suitable sites by the Council is unjustified and raises serious questions as to the robustness of Policy SG7 and Table 3.
18. Another reason for our concern with the broad-brush approach the Council has taken to identifying potential housing land currently in the Green Belt is the over-reliance on large scale urban allocations and the proposed 'eco-suburb' at Keresley, which may prove difficult and slow to deliver. If the Council had completed a more detailed review of the Green Belt boundaries it is likely that a number of smaller, easily deliverable sites would have been identified which the Council could have fallen back on should delivery elsewhere fall short (including the Chestnut Nurseries site).
19. In conclusion we are of the view that Policy SG7 and Table 3 (and by association the Core Strategy) are not justified as a result of the failure to undertake a thorough assessment of land available for residential development.

³ Paragraph 4.3.6 of the Joint Green Belt Study

20. To remedy this situation the Council should either:

- Amend Policy SG7 and Table 3 to allocate only genuinely 'strategic' sites (we would suggest those capable of delivering 1000+ dwellings), deferring the identification of non-strategic sites to a 'Site Allocations' type DPD;
- Include a new parent policy within the Core Strategy providing for a detailed review of Green Belt boundaries;
- Carry out a detailed review of Green Belt boundaries;
- Schedule a 'Site Allocations' type DPD in their LDS to define the revised Green Belt boundaries and to allocate the non-strategic sites currently in Table 3 and those sites emerging from the detailed Green Belt review.

or;

- Withdraw the current Core Strategy;
- Carry out a detailed review of Green Belt boundaries;
- Define the revised Green Belt boundaries and identify genuinely 'strategic' sites within a revised submission version of the Core Strategy
- Allocate non-strategic sites via Area Action Plans specific to particular areas of the City.

MJW 7.5.09

