

For the attention of:

Inspector: Rebecca Phillips B A (Hons) MSc DipM MCIM MRTPI

Coventry Local Plan Examination 2016

Hearing sessions 7 – 12 statement submission

Specifically Session 8 Green Belt and Session 10 Transport Matters

From:

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**SUMMARY OF OBJECTIONS TO THE PROPOSED DEVELOPMENT OF GREEN
BELT LAND IN THE MERDIEN GAP (EASTERN GREEN):**

1. Conclusions of Nigel Payne – Government Inspector – May 2010
2. Sacrosanctity of the Green Belt
3. Accuracy of Population assumptions
4. Road Network and Transportation (Cross Reference with Hearing 10 Transport Matters)
5. Health Infrastructure
6. Flood Plain & Landscape
7. Social Cohesion
8. Community Facilities
9. Light Pollution
10. Planning Applications
11. Ecology
12. Deliverability
13. Conclusion



25 August 2016

We object to the proposed development of green belt land in the Meriden Gap (Eastern Green) for either housing or commercial premises for the following reasons:

1. Conclusions of Nigel Payne – Government Inspector - May 2010

The conclusion of the Report to Coventry City Council on the Examination into the Coventry Core Strategy Development Plan Document – File Ref: 000152 – dated 27 May 2010, by Nigel Payne an Inspector appointed by the Secretary of State for Communities and Local Government remains valid. We make reference to this report within this document. The Inspector unequivocally concluded that the release of this site from the green belt was not justified by the available evidence and that it was not suitable or appropriate for identification as a reserved new housing site.

The inspector concluded that unlike other greenbelt sites around the city this proposal would not provide a logical, firm and defensible boundary to the greenbelt. He considered it more likely that the presence of a new road around this area would inevitably lead to further pressure for more land south of the A45 to be released for development in the future, in conflict with guidance in PPG2 and the CS objectives.

He was also satisfied that this land contributes strongly to green belt objectives in that it helps prevent urban sprawl from Coventry; safeguards the countryside from encroachment, helps to preserve the setting and character of the Meriden Gap as well as encouraging recycling of previously developed land.

The inspector also concluded that this area on the western edge of the city falls outside any north/south corridor on which major new developments should be focussed in order to fulfil the sub regional strategy. When its location within the strategically important Meriden Gap is also taken into account it is clear that the judgements made in the JGBS regarding those sites that were “least worst” if new housing land has to be found in the present green belt, should be supported in this instance. Growth should be sustainable and focus on North/South axis, centred on the City, thereby protecting the strategically important Meriden Gap. This was supported by proposed transport improvements, such as NUCKLE 1 & 2 in the North/South corridor

The current circumstances for employment and population change are uncertain with a predicted recession as a result of the Brexit vote. Coventry City Council's current Employment Strategy has two main areas of focus: 'to help people get jobs; and to help improve the skills level of local residents'. This would suggest that the economic decline reversal referred to in 3.86 of the Inspector's Report has not taken place. This employment strategy is incongruent with the aspirational workforce that the Local Plan is hoping to encourage into the city. It is also inevitable that the Brexit vote will have an impact on the population statistics that have been used to ascertain the doubtful assertion that Coventry requires 42,000 additional homes. It should be noted that in 2014, Coventry's population grew by 7,600 – 6,000 of which was due to net international migration.

2. Sacrosanctity of the Green Belt

National Guidance infers that boundaries should only be altered in **exceptional** circumstances. We do not accept that there are any 'exceptional' circumstances that have deemed it necessary to include the land in Eastern Green/Allesley Green in the Local Plan, particularly in the light of the Secretary of State for Communities and Local Government's recent commitment to preserve green belt

The Inspector acknowledged that to develop on the Meriden Gap would substantially reduce its largely open character and appear as urban sprawl by encroaching into the countryside in this sensitive and strategically important gap. Consequently concurring it should not be removed from the green belt or reserved for future development.

This point was unequivocally reinforced on 18 July 2016 (Hansard) in a statement by the Secretary of State for Communities and Local Government, Sajid Javid. When asked by Mrs Theresa Villiers MP 'would he guarantee to the House that during his tenure as Secretary of State there would be no dilution whatever to the vital protections of the green belt'? Sajid Javid responded: 'the green belt is absolutely sacrosanct we have made that clear: it was in the Conservative party manifesto and that will not change. The green belt remains special. Unless there are very exceptional circumstances, we should not be carrying out any development on it'.

<https://hansard.parliament.uk/Commons/2016-07-18/debates/16071818000023/TopicalQuestions?highlight=green%20belt%20sacrosanct#contribution-16071818000174>

Gavin Barwell, the recently appointed Housing and Planning Minister, also confirmed that most development on the green belt is "inappropriate". He said: "The government is committed to the strong protection and enhancement of green belt land. Within the green belt, most new building is inappropriate and should be refused planning permission except in very special circumstances."

Despite this, Coventry City Council appear to be intent on sacrificing prime green belt land rather than developing brownfield sites and regenerating the inner city areas of Coventry which still show evidence of the blitz which took place during the Second World War. Coventry has significant and obvious areas of deprivation and housing regeneration is desperately needed if the city is to become more attractive. This Plan does not appear to address this need.

We are also aware of the fact that now that the parcel of green belt land that houses the Windmill Golf course has been included that the grading of the land has been downgraded from level 5. We are also concerned that there is a perceived risk that soil in this area is polluted where materials from landfill sites have been used to create

the golf courses topography (Asbestos, cyanide, biological agents and methane below the surface from mine workings).

3. Accuracy of population assumptions

The City Council's proposal to build 'much needed homes' in this area we feel is based on inaccurate ONS population statistics, particularly household projections which assume a continued rise in the student population (which is now at a steady level) and immigration, which is highly questionable given the Brexit result in June of this year.

4. Road Network and Transportation (Cross Reference with Hearing 10 Transport Matters)

The Inspector made it clear that he understood the concerns of local residents regarding transport generation on the present road network in the locality. Park Hill Drive is a 4a Unclassified road which has seen a significant increase in traffic throughout the estate over the years – significantly so since the completion of the Bannerbrook Estate and an accident prone roundabout on the A45/Broad Lane junction which some motorists choose to avoid by driving through Allesley Green. This includes prohibited HGV vehicles.

Upper Eastern Green Lane is also unsuitable for increased traffic flow or indeed for construction traffic. This road is currently being monitored around the Hockley Lane Junction by Woodlands Ward Councillors as a result of ongoing concerns of local residents. This can be substantiated by Councillors Lepoidevin, Male and Ridley.

The large roundabout which is situated at the bottom of Parkhill drive and links with A4114 and the A45 has been of concern to residents for some years now and requests to improve the safety of this area have so far proved fruitless. Despite being advised that there are funds available to install traffic lights at some of the junctions we have been advised that this work cannot proceed due to staff shortages. This has been an ongoing issue for several years now. This does not bode well for the proposed transport/road linkage plans to support the additional pressures that would inevitably occur with the building of 2,400 more homes in the area.

The 2010 proposal acknowledged that the local road network in Eastern Green would be incapable of satisfactorily accommodating the additional vehicular traffic likely to be generated. It therefore proposed a new road link across the Slipperside Valley and Pickford Brook to serve the development principally from the A45 to the north, via a new traffic light controlled junction. Access to the existing adjoining housing areas and Eastern Green generally would be limited to walking, cycling, buses and emergency vehicles only.

At a previous hearing this year the developers stated that they do not need to wait for this new road to be built before commencing work on the proposed development.



However it is clear to local residents that this would not be feasible given the classification of local roads.

The Council Officers advised at the July hearing that there will be cycle lanes which will join up with existing cycle lanes, however there are no cycle lanes in this area at present.

It was suggested in the 2010 report that a park and ride facility be provided south of the A45 to discourage use of private cars – as local residents we fail to see where there would be sufficient land available for this provision. We would question why the high frequency bus service which was also suggested in the plan has not already been put in place in order to alleviate current traffic volume into the city centre? The City Council have had six years to put this in place for existing residents of Allesley Green and Eastern Green.

At a recent hearing Council Officers advised of their plan to provide access for buses and emergency vehicles through the existing roads around Allesley Green. In our opinion this is not feasible as roads on the estate are narrow, congested and would impact adversely on the safety of local residents.

5. Health Infrastructure

The proposal for housing development for Eastern Green alludes to the provision of a Primary Care Practice - our investigations reveal that no such plans exist. In actual fact the current plan would be to redistribute patients to practices in nearby Broad lane and Tile Hill. Allesley Green (built some 30 years ago) and the more recent Bannerbrook Estate still await their own health provision which was promised at the development stage.

The plan does not take into account how the city of Coventry would cope with such an expansion of the population particularly in the following health and social care areas:

- Acute Hospital Services UHCW (PFI)
- Mental Health Services
- Community Nursing Services
- Primary Care Services, General Medical, Dentistry, Optical or Pharmaceutical Services.
- Ambulance Service and Response Times to Accidents
- Social Care (Adults & Children)

A key determinant of good health is the provision of reasonable quality housing. Coventry has significant areas of poor housing stock that contribute immensely to poor health outcomes. This is where Coventry City Council's focus should be. It is clear that there has been a lack of crucial communication with agencies such as Coventry & Rugby Clinical Commissioning Group, University Hospitals Coventry &

Warwickshire; Coventry Partnership Trust and West Midlands Ambulance Trust – all of which are under extreme pressure currently to achieve targets with the existing

6. Flood Plain & Landscape

It was highlighted in the Inspector's report that residents had raised concerns over surface water drainage in the vicinity, particularly in the light of significant flooding in December 2008. They also draw attention to the presence of an important aquifer from the (permo triassic) sandstone said to be only a couple of feet or so below the land's surface at times, which historically provided water for the many local wells hereabouts. However, the Inspector concluded that the most important consideration was the role that this land plays as part of the present greenbelt on the western edge of the city within the Meriden Gap and where only about 1.5 miles separates it from the settlement of Balsall Common. This view clearly supports the retention of the Meriden Gap and it remains unclear as to what has changed since the last Inspector's Report

The Inspector acknowledged the clear views which extend in all directions and concluded that "development of this land would clearly amount to urban sprawl, encroachment of built development into the open countryside and the reduction of the Meriden Gap". He was equally sure that, as emphasised by its largely open aspect to the west and south west, with landscaped views representative of those described as typically "Ancient Arden", that this land properly fulfils the purposes of green belt designation. Avoidance of urban sprawl; encroachment of built development into open countryside and reduction of the Meriden Gap should remain a priority. The additional proposed inclusion of warehousing and office accommodation is deemed to be unnecessary given the number of units locally that are unoccupied (several within one mile of the proposed site - Villiers Court Meriden Business Park, Copse Dr, Coventry CV5 9RN). - See attached photograph in Appendix I

It has to be acknowledged that the city has been unable to attract business into vacant shops and commercial units that are currently available in the city. This proposal is therefore totally unnecessary and would be an incongruent extension of built up development and an intrusion into the Meriden Gap

We believe that it is important to have a firm boundary between Coventry and Meriden (and ultimately Birmingham) we also believe that the decision taken in 2010 not to build on this land should have been formalised so that it should not be considered for development again in the future.

Although none of the area proposed has been identified as being on flood zones 2 or 3, the Environmental Agencies flood plain map for CV5 suggests a possible floodplain 3. There are clearly drainage concerns regarding the potential effect on the flood plain of the Pickford Brook in the north east corner of the site and also over the size of the culvert under the A45 to the east. It was suggested by the Inspector that modelling of all the watercourses and an assessment of the A45 culvert would be required along

with an assessment of the suitability of new crossings of the streams by the proposed access roads to take storm waters. It is not clear whether this has actually been actioned.

7. Social Cohesion

The Inspector highlighted his concerns that a development on the scale envisaged would impact adversely on social cohesion and integration.

Despite the fact that Allesley Green has been established for over thirty years, social cohesion concerns still apply. Allesley Green, and the nearby Eastern Green and Allesley Village are already considered to be very separate communities –mainly because there are very few community and social amenities locally. Allesley Green Residents Association and St Andrew's Church Eastern Green have been proactive in trying to bring the community together where possible. However it should be noted that although some social cohesion has been achieved within Allesley Green a significant amount of work is still required to bring together the residents of Eastern Green and Allesley Village.

One community venture which has been initiated by the Allesley Green Residents' Association and St Andrew's Church has been the joint working between Coventry City Council and WREN, a charity that helps benefit the lives of people who live close to landfill sites by awarding grants for community, biodiversity and heritage projects.

The bid was successful and an award of £50,000 was made to help replace the play equipment and improve the landscape in Juniper Park, Allesley Green. They are also awaiting the outcome of a further funding bid from Tesco which will support with the provision of benches, noticeboards and litter bins and to support with biodiversity projects.

One of these projects is to improve Pickford Brook, one of the tributaries that runs into the River Sherbourne. As part of the City Centre plan this brook, as well as others in the area, will form part of the proposal to open up the River Sherbourne around the Hales Street/Bishop Street area in the city centre and it is intended that this work will involve developing the tributaries leading to this area. Proposals to build in this area will inevitably prejudice this community and city council led initiative.

8. Community Facilities

The Windmill Hotel had a membership of 302 in May 2016 which included leisure club and golf club members. This contradicts the Local Plan figure of 92 members and demonstrates that it is a well-used community facility and is in fact the only 'pay as you go' golf course in Coventry. As it has also been suggested that the golf course topography has been created using contaminated soil – it would therefore be inappropriate to disturb it, or for surface water to be drained through the soil to holding

reservoirs as was suggested by developers at the July hearing. There is no doubt that the soil in this area which would create a potential health hazard.

9. Light Pollution

We feel that consideration must also be given to the effects of any unnecessary light pollution. We benefit from relatively clear and dark skies at night, and only have minimal light from the Birmingham direction at night. Many environmentalists, naturalists, and medical researchers consider light pollution to be one of the fastest growing and most pervasive forms of environmental pollution. And a growing body of scientific research suggests that light pollution can have lasting adverse effects on both human and wildlife health.

10. Planning Applications

Research has shown that over a recent four year period 12 planning applications in this area have been turned down by Coventry City Council in order to support the protection of the area and the Meriden Gap in particular. This is incongruent with the Local Plan's proposal to build 2,400 properties in the area.

11. Ecology

Middlemarch Environmental and Ecological Consultancy, based in Meriden have conducted many surveys on behalf of Warwickshire Wildlife in the local area and know the area well. Warwickshire Wildlife who have a reserve at Harvest Hill also conduct regular surveys of this area and have recently focussed on locating Water Voles along the Pickford Brook.

The Warwickshire Wildlife Trust have highlighted that there is evidence of Great Crested Newts in the pond which is located within the Windmill Golf Course both in pond 1 and pond 2. Great crested newts are a European protected species. The animals, its eggs and their breeding sites and resting places are protected by law

Residents around Eastern Green and Allesley Green have heard the cuckoo arrive each spring for some years now and it should be noted that these birds are on the ornithological 'red list' which indicates birds that are increasingly at risk. There are a number of Skylarks which have nested at the back of the Windmill Golf Course this year and this has been the case for around five years. Again, skylarks are on the 'red list' - at risk of declining and it has been suggested that these might be the only ones in the Coventry area.

There is a significant amount of bat activity around the boundary trees close to the golf course and surveys have been undertaken by the Bat Conservation Society which have identified three types of bat: Common Pipistrelle, Daubenton's Bat and Noctule Bat.

There are three badger sets on the edge of the proposed development site and these were acknowledged in the last Inspector's report.

This area is also a geocaching area which provides a recreational activity not only for local residents, but also for visitors from other parts of the countryside.

The Green Belt area around Eastern Green and Allesley Green is regularly used by walkers; geocachers; bird and wildlife spotters and those who enjoy playing golf on a well maintained golf course. We regularly spot and hear a wealth of wildlife around our garden including owls; bats; pheasants; jays, woodpeckers; a plethora of garden birds; birds of prey; foxes; hedgehogs and rabbits – We wonder where this wildlife will go if planners get their wish to change the status of the green belt land?

The Meriden Gap is of 'specific importance and therefore should not be in the plan' in order to avoid encroachment and urban sprawl.

12. Deliverability

We believe that deliverability of this plan would be an issue based on current building expectations and this is therefore an unsound proposition. The city council and other public service areas have a poor track record for delivering both minor and major road improvements; revised transportation arrangements and health infrastructure changes. Local people have little confidence in their ability to respond to requests or to deliver/complete projects on time.

13. Conclusion

To conclude, we express these objections as we believe that if this area were to be developed it would infringe the five key purposes of green belt – i.e.:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

We believe that the evidence which we have provided in this submission indicates that the infrastructure to support this plan is significantly flawed and unsubstantiated.

Irreversible use of greenbelt land cannot be justified given the above uncertainties. A more realistic approach would be to proceed with brownfield development – at least until a period of economic stability emerges.

Our hope is that Site Allocation H2.2: Eastern Green will be modified and that it will be deleted from the Local Plan. Instead of proposing to build houses on Green belt land a much greater emphasis should be placed on the regeneration of the poor



housing stock that exists just outside the Coventry's ring road and which still shows the detrimental effects of the Coventry Blitz of 1940. This would inevitably lead to population health gain.

In total, the Coventry Plan suggests that 42,000 new homes are required for the City we do hope that common sense prevails and that this proposition is accepted as being flawed. It must be acknowledged what a tremendous pressure that this would put on the City's infrastructure which is already struggling to maintain efficient services in a range of areas for its current population.

Lilias Maddock

Peter Maddock

25 August 2016

25 August 2016

Appendix I:

Unlet units: Villiers Court Meriden Business Park, Copse Drive, Coventry CV5 9RN



25 August 2016