Coventry Local Plan Examination. Hearing Statement: Green Belt. Respondent name: Pickford Green Residents Association. Representor no. 855. Hearing Session 8: Green Belt.



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Hearing Statement made on behalf of Pickford Green Lane Residents Association Limited.

Hearing Session 8: Green Belt. To be considered on 12th October 2016.

Land at Pickford Green Lane, Coventry, CV5 9AP.

OUR REFERENCE: 10475 Hearing statement. Session 8. Green Belt DATE: September 2016.



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1. Introduction

Scope of this statement

- 1.1. This hearing/written statement is to be read in conjunction with the representation made on behalf of the Pickford Green Lane Residents Association Limited. (PGLRA) to the 'publication stage Coventry Local Plan 2016', and to further representations made to the Hearing Statement submitted in respect of the proposed Eastern Green SUE allocated sites These were made by letter and completed forms to Coventry City Council dated 26th February 2016 (our ref: 10475.LPA1. JD), and June 2016.
- 1.2. Please note we have been advised by the City Council Planning Policy officer that our representation number is 855. However, this rep number has in error been attributed to both this site and a second and separate representation that this consultancy made on behalf of Mr. P.Nicholas-Gilbert.
- 1.3. The gist of our representations are to support the EGSUE as proposed by Policies H2 & JE, support the review of the Green Belt boundary to accommodate this, but object to the proposed linkage of the employment being proposed in advance of the housing, object to the omission of our client's site from the EGSUE, and object to the proposed safeguarded land designation of the Pickford Green Lane site.
- 1.4. This statement considers the questions posed by the Examination Inspector as set out in the document entitled 'Coventry Local Plan. Hearing session 8: Green Belt', which is to be considered at the Hearing session currently time tabled for 12th October 2016.

2. Matters & Issues for Examination.

2.1 The overall comment in relation to the omission of our client's site from the EGSUE is that its exclusion is illogical and not in the interests of good planning. Its inclusion would allow the whole EGSUE to be delivered in accordance with a comprehensive masterplan which should take into consideration the elements of the development that would be required to ensure a sustainable form of development is delivered. Conversely if the site is excluded it is likely to become an isolated piece of land which would not be integrated in to the EGSUE, as there would be no commercial incentive to do so. These comments are equally applicable to the consideration of the green belt boundary review, as there is no logic or justification for its proposed 'safeguarded land' designation.

2.2 Set out below is the list of Inspector's questions, and our response to them.

Green Belt

a) – n) NO RESPONSE.

Reserved Land in the Green Belt

a) Do exceptional circumstances exist which justify further alterations to the Green Belt boundary to release additional land for housing and/or employment development, either within the Plan period or as 'reserved' land for development beyond the Plan period?

On the basis that the whole Eastern Green SUE is justified, and thus exceptional circumstances as envisaged by NPPF do exist to justify the redrawing of the Green Belt Boundary to accommodate it, any such redrawing must then take into consideration the NPPF para 85 requirements.

In respect of the land at Pickford Green, (which excludes the land from the proposed allocation, yet is surrounded on 3 sides by the proposed SUE, with the remaining boundary being the Pickford Green Lane carriageway), the proposed revised green belt boundary currently drawn in the proposed policies map is inconsistent with a number of the following bullets of para 85, in that:

- It is not consistent with the way the boundary has been drawn elsewhere to accommodate the EGSUE.
- The Pickford Green site would not contribute to the openness of the green belt as it would be surrounded an 3 sides and boxed in by new development,
- The proposed safeguarded land designation is not justified on the basis of evidence in respect of the Pickford Green Lane site.

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- It would not be necessary to where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- It does not 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. The logical boundary for the green belt in this location is the Pickford Green Lane itself and not a contrived re-drawn boundary bases solely on landownership parcels rather than logical, permanent boundaries.
- *b)* Would the development of the other area(s) be achievable within the Plan period, or should it/they be safeguarded for development beyond the Plan period?

NO RESPONSE.

c) Is the proposed reserved land in the Green Belt in Policy GB2 compliant with the NPPF or should it be identified as safeguarded land?

See above.

d) How will the reserved land come forward if it is required during the Plan period?

It can be made available at any time during the plan period.

Green Infrastructure and Green Space

a) - i) NO RESPONSE.

Any Other Matters

These representations seek the Local Plan and Policies map to be amended so as to exclude the land at Pickford Green from Green Belt and remove its apparent proposal to retain it as safeguarded land. There appears no justification for considering this piece of land in isolation from the remained of the proposed allocation and would be contrary to the NPPF and thus unsound in its present form.

END OF DOCUMENT. 05.09.2016