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Coventry City Council

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Representor number 912.

Statement Re: Session 8, Greenbelt ,Coventry Draft Local Plan
Examination Hearings.

I wish to attend and contribute to this session, please confirm receipt
of this request.

Matters & Issues for Examination

1. Green Belt

- . a) Is the proposed development on Green Belt land justified? Do exceptional circumstances exist which justify an alteration to the Green Belt boundary to accommodate new development which the Council says cannot be met elsewhere?

Given the serious doubts raised on the future population growth projection figures and sustainability issues already discussed during this public examination, no, the planned developments are not justified

- . b) Has an adequate assessment of Green Belt purposes been undertaken?

Demonstrably, no. As I set out in my previous statement:

Concerned residents were told by CCC during the 2014 consultation that a comprehensive Joint Green Belt Study would be undertaken and used along with previous similar and associated reports to identify the "worst performing and lowest value" parts of Coventry's very limited Green Belt land. These sites may then be considered to have their GB protection removed and made available for housing.

This novel approach to the Green Belt is a cause for great concern; if Coventry airport needs to expand, it is the adjacent fields that must be used, not some scrubby parcel of Green Belt land elsewhere in the City. Further, the policy of rewarding farmers and landowners who do all they can to devalue and despoil the Green Belt land under their control with planning permission is unsound and unsustainable. The consequence of this can only be a huge disincentive to owners to properly manage and improve land, in fact under this approach, removing trees and hedges and discouraging biodiversity will eventually increase the site's monetary value many hundreds of times. How can this be considered a sound or sustainable policy?

In an associated example of CCC's lack of transparency; I along with other Parish Council members and individuals took a day off work and attended a meeting with CCC planning officers in late 2015. There we were told that the Green Belt Study and analysis via their Green Belt Matrix exercise was not yet complete, but as soon as it was, we would be given the opportunity to read and comment on it BEFORE it was used.

The Planning Officers said they were keen to involve us at an early stage and take on board our comments prior to publication.

This didn't happen and the next we knew the Draft Local Plan was completed and announced on local BBC radio and in the local Evening Telegraph newspaper in early January 2016.

It took another fortnight for the new Draft Plan, Green Belt Study and Green Belt Matrix to actually appear on the CCC website. CCC officers told me the study (completed in June 2015) wasn't published earlier (as adjoining local authorities had done) for "fear of it being misunderstood."

I understand from my three local Ward City Councillors that they too hadn't had sight of the Study or the Matrix until *after* being asked to consider and vote on the Local Plan at the Council meeting on 12th January.

This too is unsound. CCC should not be asking its own City Councillors to vote on proposals without providing them with access to the supporting documents and evidence base.

Having now read the Joint Green Belt Study (LUC, June 2015) and the Green Belt Matrix (CCC 2015) that followed, I am greatly disappointed that these two crucial pieces of evidential work have been carried out so badly and inconsistently and the results of one interpreted in such a biased way in the other. The NPPF states that Green Belt land need only serve one the five purposes, so the novel method the steering group set and LUC carried out of measuring the sites against all five purposes is neither defensible or likely to produce any meaningful results.

As a near neighbour, I am primarily concerned about the proposals for the huge site at Eastern Green referred to in the JGBS as C25, so will use this as my example of how poorly the exercise has been carried out and how its findings appear to have been further manipulated once fed into the unexplained prism of the CCC Green Belt Matrix:

The agglomeration and expansion of component land parcels which I referred to earlier, seems designed solely to skew detrimentally this site's performance in the grading exercise. While a golf course is an acknowledged legal use of Green Belt land, the inclusion of this small golf course in the parcel has resulted in over 100 hectares of surrounding good quality, productive farm land being marked down in the JGBS as scoring just 1/4 on "Issue 1b; Openness." A visit to the sight will show how shockingly wrong this score is. The same C25 area was previously assessed in the 2009 Coventry Joint Green Belt Review (SSR Planning) when it was referred to as Parcels C16a and C16b and performed well when judged against others, no mention was made of the golf course then.

Despite this above average score in 2009, CCC's Emerging Core Strategy in place at that time had identified this area (stretching from Eastern Green down to the A45 and bounded by housing at Park Hill and Pickford Green Lane and known as Slipperside Valley,) as a potential site for an urban extension. The SSR Study concluded that

the area should remain in the Green Belt and this recommendation was at that time accepted by CCC.

The 2015 LUC Study used different indices to judge performance against all five Green Belt purposes, but its interpretation of the NPPF is flimsy in the extreme. This huge area is at the western boundary between Coventry and Solihull and has already been identified by a Government Planning Inspector as an essential part of the Meriden Gap, but scores just 1/4 under "purpose 1a; to check unrestricted sprawl of large built up areas" How can this be when building on it would effectively build upon all of the last commonly visible green space between Coventry and Meriden/Solihull BC?

The fact the land has long been accepted as an important component of the regionally vital Meriden Gap is also ignored at Purpose 2; "To prevent neighbouring towns merging into one another" LUC staff instead consider the impact any development would have in joining Coventry with the village of Pickford Green. This ignorance of the wider implications of development on this huge site is evidence of unprofessionalism or a lack of understanding and flags up that this study is far from "comprehensive". Again, the score given of 2/4 is at odds with the facts and unsound.

Under Purpose 3, the safeguarding of the countryside; the whole area (of open farmland) again only scores 1/4, due to the contrived inclusion of the golf course in the parcel. This is a ludicrous and unsound finding.

At Purpose 4, To preserve the setting and special character of historic towns, the land parcel is scored 0/4. This too is an unacceptable score. There are no towns in Coventry, so how could it score more? The spires of the City's cathedrals can however be seen from the top of the site and it dominates one of the busiest gateways to the historic *City* of Coventry. The land runs right alongside and up away from the A45; Coventry's primary East to West road.

This is the route anyone travelling across Coventry drives and the one visitors already use when arriving from Birmingham Airport and the motorway hub at the NEC. It is also the road that will link the City to the planned HS2 station at Stonebridge.

To replace these rolling fields at our increasingly important western gateway to Coventry with bland industrial units and housing would

mean any visitor using the A45 will see nothing of the City's Ancient Arden landscape setting. Instead they will experience an uninterrupted run of post war housing and industrial sites from Eastern Green, through Canley and the south of the City and onto the looming new business parks and factories at Baginton, Tollbar End, Coventry Airport and Ryton before entering Warwickshire.

So much for the Green Belt Study, onto the CCC Green Belt Matrix (2015)

The Matrix notes that development at the Eastern Green site C25 would be "intrusive and by extending beyond the indicative line northward, the impact becomes progressively greater to the extent that it would give the appearance of significantly reducing the Meriden Gap"

Under the heading 'Landscape Characteristics' it wrongly states there are "various industrial and office buildings between the A45 and Meriden Road" These buildings are not within the parcel, which ends at Pickford Green Lane. I am concerned that this basic but important factual error has passed unnoticed into the final report. This mistake undoubtedly had a negative influence on the site and it should be corrected and the site reassessed. If replicated, this shoddy research is evidence of a poor level of accuracy by CCC officers, which calls into doubt the soundness of the whole report, its findings and its recommendations.

The Agricultural Land Classification rates the site broadly as "very good quality and good quality" No positive weighting appears to have been given to this substantial piece of evidence.

The Matrix notes the parcel is one of the "most constrained" based on their own SA/SEA Assessment framework, but try as I might, I cannot find the evidence for this.

Under "Drainage and Flood Risk" it is noted that the site is in part "within the flood zones 2 and 3." An inconvenient truth.

Under the section "Infrastructure Issues and Mitigation Options", it becomes clear that the contentious golf course is NOT a guaranteed part of the development and would be "subject to negotiation requiring appropriate compensatory arrangements."

In "Site Conclusion and Recommendation" CCC officers are being disingenuous and dancing on the head of a pin when they write development at the Eastern Green site "will not reduce the physical distance of the Meriden Gap" This of course depends where it is measured and ignores the accepted guidance that the *perception* of a Green Belt break, space and a gap between towns and cities is just as important as the physical distance as the crow flies.

This proposed mega development, alongside one of Coventry's busiest access roads would destroy entirely the perception of the Meriden Gap.

This site is not included in the bottom twenty which are shown in the SSR Green Belt Review, Final Report, Appendix 14; "Least constrained parcels" but despite all of this, and still, months after asking but with no formula provided to show how the decision has been made or who made it, the authors of the Matrix conclude the Eastern Green site should be removed from the Green Belt and developed. This is not a transparent or sound way to make such momentous decisions.

Nowhere in the Matrix are the views of the local community and Parish Councils (who are universally against the development) even mentioned or considered. The reasoned and reasonable arguments and feedback submitted by hundreds of residents directly and via their Ward Councillors or at Ward forums have been simply ignored, making a mockery of the consultation exercise.

Further to this and with no additional information as to the process, this site has become a key part of the Local Plan, relied upon to provide several thousand houses and 15-20 hectares of industrial space.

- . c) Has adequate consideration been given to the need to promote sustainable patterns of development?

Again no. The alternative options of building at a higher density on brownfield sites or embarking on a programme of replacing the city's many areas of substandard housing with better accommodation were glibly discounted out of hand early on in the process, with no official research or costings having been

carried out by CCC.

- . d) Does the review of the Green Belt adequately support the release of part of it? Moreover, does the review of the Green Belt adequately support the release of those particular areas of the Green Belt proposed to be developed (identified in Policy GB1 criterion 3)?

No. Please see my answer to question 1b. Despite the bias, unconventional method and tortuous massaging of the facts, the site for the proposed Strategic Urban Extension at Eastern Green scores above average in the review (and would have scored far higher if the review had been carried out in a fair and objective way.) Further the site is not identified in the SSR Green Belt Review Final Report (Appendix 14 Least Constrained Parcels) as being one of the twenty lowest scoring and therefore "least valuable" in the City

- . e) What will be the effect on the Meriden Gap?

With Solihull Council's ambitious and extensive plans for development agreed at and around the HS2 terminus at Stonebridge and new housing already built in Meriden and Catherine De Barnes, the SUE at Eastern Green on the Coventry side of the authority County border would effectively destroy The Meriden Gap. Residents and visitors travelling by road or the mooted high volume transit link between this new hub, the motorway network, Birmingham and all points west along the A45 will see unbroken development on both sides for the duration of their journey through Coventry. CCC have previously used measurements over inaccessible farmland at the Gap's widest point to claim that the SUE would not reduce the Gap, but this is an unacceptable stance. It is the perception of the Gap (ie that which is felt and seen by residents and visitors every day) which is of paramount importance. The building of a SUE directly

alongside Coventry's primary, busiest east/west arterial route and just a few hundred metres from the "welcome to Coventry" roadsigns would effectively forever close the Meriden Gap.

- . f) Is there adequate justification, including Sustainability Appraisal and assessment of the transport, education, health, drainage, sewerage and other infrastructure implications for the selection of Green Belt areas to accommodate the Keresley SUE?

No. Especially in the areas of health, education and transport. The same goes for the Eastern Green SUE. The Inspector heard the unconvincing, devoid of detail testimony of the CCC transport officer at an earlier hearing where the nascent plans for the building of a mass transit system (bus only lanes, electric tram, light rail?) along the A45 were outlined. All of these options will require considerable extra land at either side of the road, yet this isn't mentioned at all in the draft local plan or in the design of the Eastern Green SUE and its connecting access roads and bridge. There are no contingencies in place despite this project being highly likely to be required.

- . g) Would the proposed new grade separated junction from the A45 referred to on page 123 and the new distributor road on page 122 of the LP further erode the Green Belt? Should they be included on the Policies Map?

Of course it will. It also goes directly against the assurances residents were repeatedly given that the land on this side of the A45 would remain untouched. There still appear to be no plans or drawings available of this new junction, roundabout and flyover, so no way of judging the area of Green Belt that will be affected. However looking at similar junctions, there will need to be significant land used, earthworks and banking built to give the access road the safe angles it would need to turn traffic 90

degrees and the necessary gradient and height clearance where it crosses over the A45. This long run of banked verge would also effectively block the travellers view of the farmland and ancient woods on that side of the A45, further compromising the perception of the Meriden Gap.

- . h) Without a Green Belt designation, would parcels of land proposed to be removed from the Green Belt be adequately defended or would they be vulnerable to encroachment or ribbon development?

It is my understanding that once Green Belt designation has been removed, there is no statutory protection CCC could use to 100% guarantee the land is used in the way the developers originally outlined. The Inspector heard statements during the earlier hearings from residents and local Councillors detailing cases where promised health care and schools have simply not been delivered. CCC Planning Officers admitted then that this is a complicated, difficult, ongoing challenge and there appears to be very little they can do to force compliance. I do not see how this would be any different for the (far more attractive) newly vulnerable ex Green Belt sites.

- . i) Does Policy GB1 set out an appropriate approach to the management of the Green Belt?

Absolutely not. As detailed in my answer to question 1b, despite the recommendations of previous expert studies, CCC have historically failed to encourage, facilitate or fund the proper management or improvement of the Green Belt. Their new policy of rewarding owners and agents who neglect or deliberately despoil their Green Belt land with valuable planning permission, while offering no encouragement to those who wish to improve the ecology, biodiversity, wildlife or amenity value of Green Belt land under their stewardship is utterly indefensible.

This policy and approach negates entirely the hollow platitudes in policy GB1

- . j) Should Policy GB1 clarify the extent (ha) of land to be removed from the Green Belt? Should it also clarify the extent of land to be removed from Green Wedges?

Yes. It should also produce detailed maps showing the exact plots and boundaries under discussion.

- . k) Is criterion 7 of Policy GB1 consistent with paragraph 89 of the NPPF in respect of infill development in the Green Belt?

I don't believe so.

- . l) Should the 'very special circumstances' referred to in the Plan instead refer to 'exceptional circumstances' to be consistent with the National Planning Policy Framework (NPPF)¹?

CCC's choice of words in the draft plan were deliberate and are important as they evidence the fact the authority does not believe it has the necessary robust evidence to support a claim that it is facing 'exceptional circumstances'

- . m) Has adequate justification been provided for removal of Green Wedges from the Green Belt and their designation as Local Urban Green Space? Would additional local benefit be gained?

I do not believe so. This needless relabelling weakens protection for the plots but adds nothing. The financial pressures already forced upon the authority mean there will be little funding or resources available to develop and support these new sites and the lamentable state of the city's existing parks, recreation and

sports facilities and green spaces show that investment in such projects is a low priority.

n) Does this conflict with NPPF paragraph 77 that specifically does not recommend a Local Green Space designation for extensive tracts of land such as Green Wedges?

It certainly appears to against the clear guidance contained in the NPPF

¹ NPPF paragraph 83

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2. 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?

I dont believe so.

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

