

**Coventry
Local Plan
Examination**

www.coventry.gov.uk/localplan

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Coventry City Council

Local Plan 2016 - Examination Statement

Hearing Session 8: Green Belt



Coventry City Council

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Part 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?

The supporting text on pages 92 and 93 of the Local Plan (as submitted) clearly sets out the exceptional circumstances that exist to justify the release of land from the Coventry Green Belt. We note that our submitted plan makes reference to "Very Special Circumstances", which, for the purposes of Plan making, we would acknowledge should be replaced with "Exceptional Circumstances". In summary the Plan highlights:

- The city's tight administrative boundaries and shortage of available land;
- A lack therefore of reasonable and appropriate alternatives;
- Diminishing brownfield opportunities;
- Significant growth in the city's population and subsequent development needs;
- Importance of sustainable development and provision of jobs and homes;
- The need to diversify the city's housing stock;
- Importance of supporting and facilitating economic growth; and
- Importance of meeting identified housing needs for market and affordable homes.

Through, evidence, consultation and sustainability appraisal we have considered alternative approaches such as a significant uplift in density of brownfield sites and/or the redistribution of homes 'beyond the Green Belt'. The former would not meet the housing needs of Coventry both now and in the future and for reasons already discussed during these hearings, would not support the accelerated delivery of housing and would not represent a sustainable format of development to attract and drive market investment and diversify the city's housing offer. The latter, would result in the city's need being delivered in locations significantly detached from Coventry, both towards the edge of the HMA and beyond it. This in itself would generate further implications for the HMA's ability to meet its housing needs and introduce significant risk and uncertainty in relation to the Duty to Cooperate.

Lastly we would highlight the original meaning of Green Belts. Created formerly in planning policy after World War 2, Green Belts stemmed from the protection zones around London and were rolled out to the Countries most important city's – including Coventry. Their intention was to ensure growth of the urban areas was controlled through the planning process and that the main urban areas did not swallow up smaller towns and neighbouring cities. Green Belts were always intended to be reviewed though and were never intended to prevent the growth of such cities. As already suggested they were intended to control growth and ensure it was managed in an appropriate and sustainable way over time. To prevent cities from growing is to sentence them to managed decline, to restrict

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inward investment and see them fall behind competing cities in terms of housing offer, job creation and retail/leisure/community provisions. Managed decline would therefore encourage and facilitate localised recession and decline in economic fortunes.

This Plan represents the first time in 50 years the city of Coventry has positively planned to expand its urban area into its Green Belt. In doing so the city is planning for growth and investment to help it compete with its neighbouring areas.

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

Yes. In the Coventry context, there are three separate studies that are of relevance in respect of the assessment of Green Belt purposes. These include:

2007 Green Belt Review (LP68):

The study was a Coventry centric assessment and the criteria used for the study is consistent with the five purposes of Green Belt. At the time of the study it was subject to conformity with national guidance - PPG2, although this does broadly align with the replacement guidance set out in the NPPF, Para 80. Specifically, it did assess views and nearby historic towns (4th purpose), safeguarding the countryside from encroachment (3rd purpose), check unrestricted sprawl of the built up area (1st purpose).

2009: West Midlands Joint Green Belt Review (LP69):

Appendix 2 of this study sets out the criteria upon which each of the land parcels were assessed. The study was again undertaken pre-NPPF, however the criteria used mirrors the criteria as set out now in the NPPF, Para 80 and so is considered to be NPPF compliant. It is important to note that the study only covered the urban fringes of Coventry and Green Belt land around Kenilworth, Leamington/Warwick and Nuneaton and Bedworth. It did not consider the Coventry and Warwickshire Green belt in its entirety

2015 Coventry Green Belt Review (LP70):

This most recent study specifically addressed all of the five purposes of Green Belt as set out in NPPF, Para 80 and so is considered to be 100% NPPF compliant. It also represents the first time that the entire Green Belt of Coventry and Warwickshire has been assessed in 1 place utilising a consistent methodology. For the avoidance of doubt, the study was completed in 2 phases which largely reflected the overlapping of Stratford District and North Warwickshire Borough with the Greater Birmingham HMA as well as the respective stages of each authorities planning process. As such these authorities were covered by stage 2 of the Joint study, which has now been completed.

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In conclusion, over the eight year period (2007-2015), the Council considers that the studies referred to above have provided a robust and adequate assessment of Green Belt purposes.

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

In responding to this question we would highlight our response to question 1(E) to hearing session 7. In principle we would again highlight the key diagram that is included in that response.

That diagram clearly shows how we have worked with our neighbouring authorities to align the delivery of new homes and jobs in and around the city for the duration of this Plan period. This helps to ensure sustainable patterns of development can be achieved in a sustainable and deliverable way.

Consideration to the approach to sustainable development patterns has been factored into various consultation exercises and Sustainability Appraisals. It has also formed a key consideration in the Coventry and Warwickshire Housing Requirements MOU (September 2015) (LP10). This later element highlighted the importance of sustainability in terms of locating development either adjacent to the city boundary or along key transport corridors that would ensure ease of accessibility to the city.

This further supports the exceptional circumstances to justify the release of land from the Green Belt.

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)?

The reviews of the city's development needs coupled with the assessment of its available land supply show a clear disparity between the amount of land available outside of the Green Belt and the amount of land required to sustainably deliver the city's development needs.

Taking this situation as a starting point, the Plan has clearly considered all land options that exist within the Green Belt to try and supplement the land that exists outside of it. This in principle is summarised within the Green Belt Matrix (LP77). We have compiled this document based around the following key diagram:

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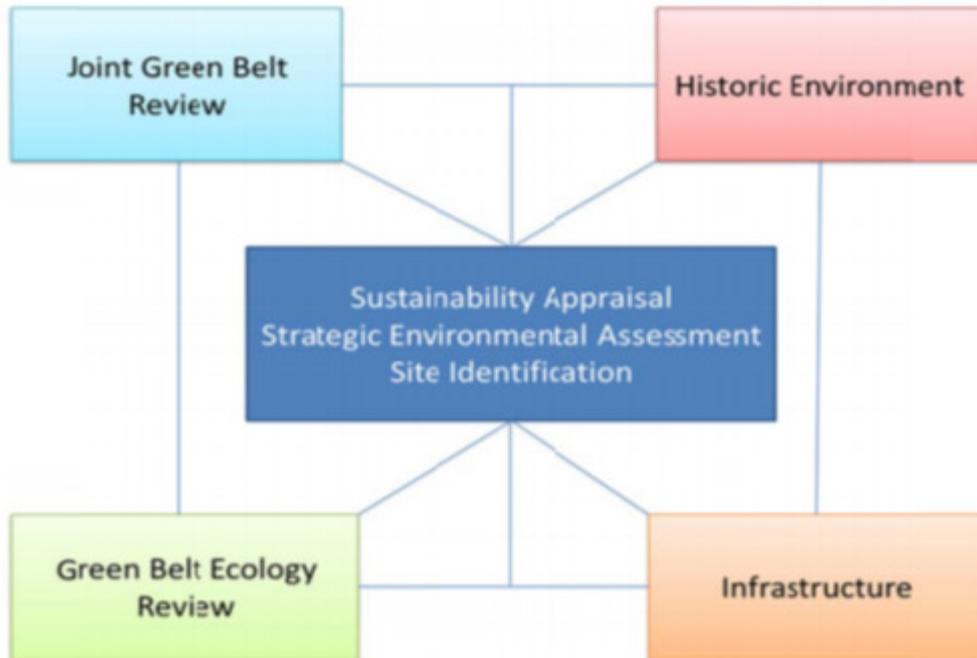
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This has helped to reflect the range of evidence that we have deemed appropriate and necessary to help inform our decisions about where land could be removed from the Green Belt to support growth. It also helps clarify that the release of land from the Green Belt is not a straight forward process that should be informed by a single piece of evidence or a single document. It has to take into account a range of considerations to help reach an informed view or recommendation. The Matrix document considered:

- The 3 Green Belt reviews – including the Joint C&W Green Belt review of 2015, which focused primarily on the purposes of Green Belt;
- An updated review of ecology and biodiversity values throughout the existing Green Belt;
- A high level review of agricultural land values;
- An initial review of landscape character which was also incorporated within the 2009 Green Belt review and considered as part of the 2015 SHLAA update through the site appraisal process;
- A review of historic character and value utilising evidence from the Historic Environment Record and other supporting evidence (which is clarified further in our SOCG with Historic England);
- The wider outcomes of the SHLAA site appraisal process and site promotion process;
- Strategic Flood Risk Assessments and information regarding drainage;
- Design implications, including key site features, issues and opportunities;
- Other infrastructure implications and opportunities, for example capacity of surrounding facilities and opportunities to link into existing provisions and support sustainable development etc; and
- A review through the sustainability appraisal matrix

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

The issue of the Meriden Gap has been discussed previously in relation to the hearing statements relating to the proposed developments at Eastern Green and Cromwell Lane.

The Meriden Gap has never formally been designated but is commonly referenced as the area of that separates Coventry from the wider urban edge of Greater Birmingham (starting principally at Solihull and Birmingham International Airport). This area has subsequently been subject to Green Belt policy with the village of Meriden being broadly located at the centre of the 'gap'. In addition to Meriden there are a number of additional villages that are technically within the Meriden Gap, with the primary examples including Balsall Common, Hampton in Arden and Berkeswell. All of these villages enjoy different relationships with the 2 principle urban areas to the east and west. In order to understand the impact on the Meriden Gap of the proposed development in Coventry therefore we have considered the relationship between Coventry and each of these locations. We have primarily considered the spatial relationship in terms of distance, having regard to narrowest points before and after development (assuming the adoption of the Plan and delivery of the relevant sites as proposed). For ease of reference we have shown this in map format for each location (below). Furthermore we have considered the proposals through the Duty to Cooperate with Solihull Borough Council as we consider this a strategic matter and the majority of the gap, and the villages referenced above rest within their administrative boundary. In this respect we make reference to the consultation response received from Solihull Council to the submission draft of the city's Local Plan (ref ID 723 in part 1 of LP16). We have also had regard to our wider Green Belt evidence documents to understand what if any the impacts of proposed development may be on the Meriden Gap.

Coventry to Solihull

The maps below (figure 1 and 2) show the 2 principle urban areas of Coventry to the east and Solihull to the West. At the current time the gap (at its narrowest point) extends to approximately 5miles from the western most edge of Coventry (broadly speaking at the junction of Church Lane and Manderley Close) to the eastern most edge of Greater Birmingham (at the junction of the M42 and the A45 – the airport and NEC).

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Figure 1: Coventry to Solihull – with development proposals

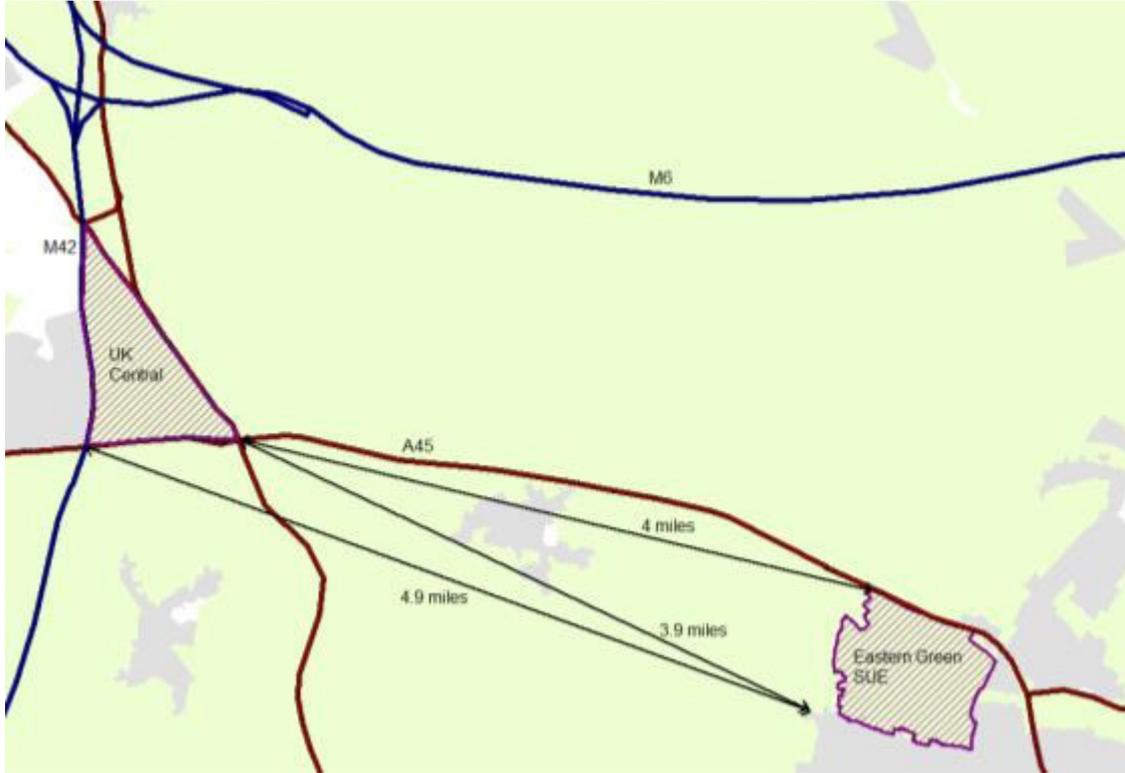
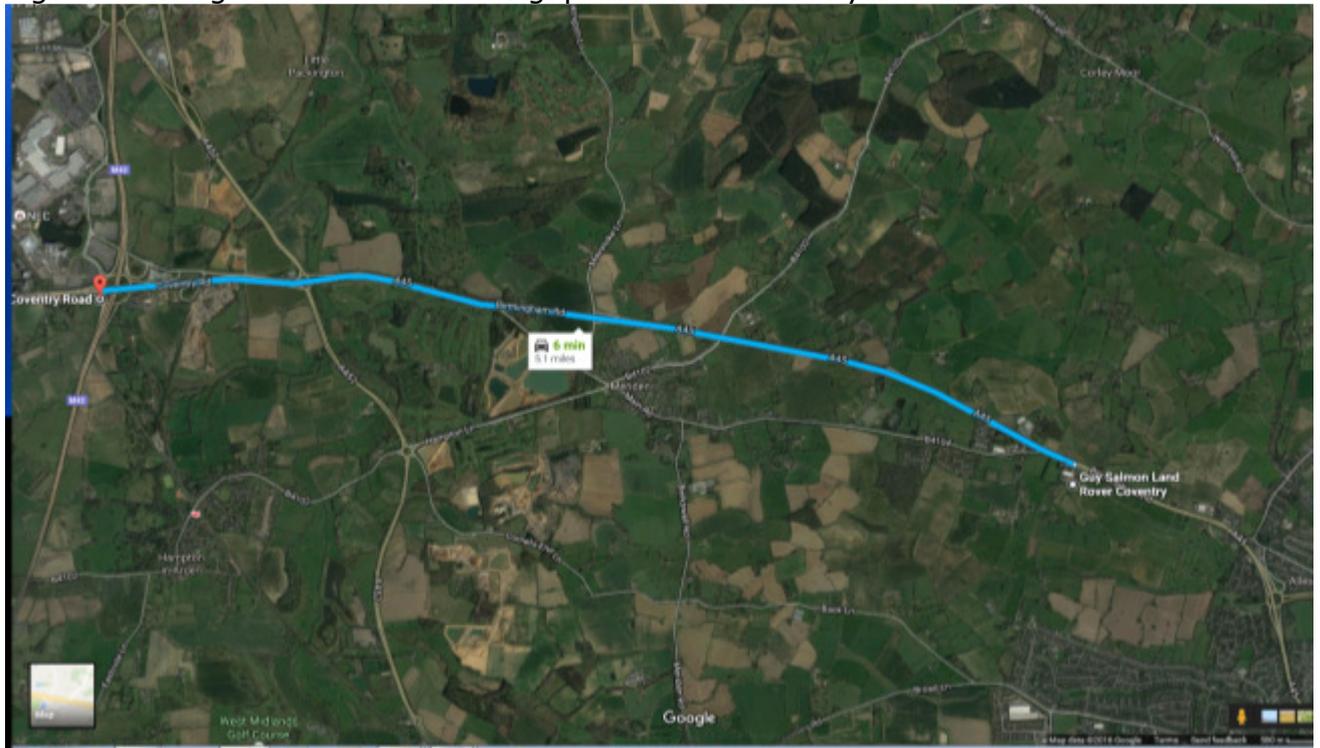


Figure 2: Google Earth view of the gap between Coventry and Solihull



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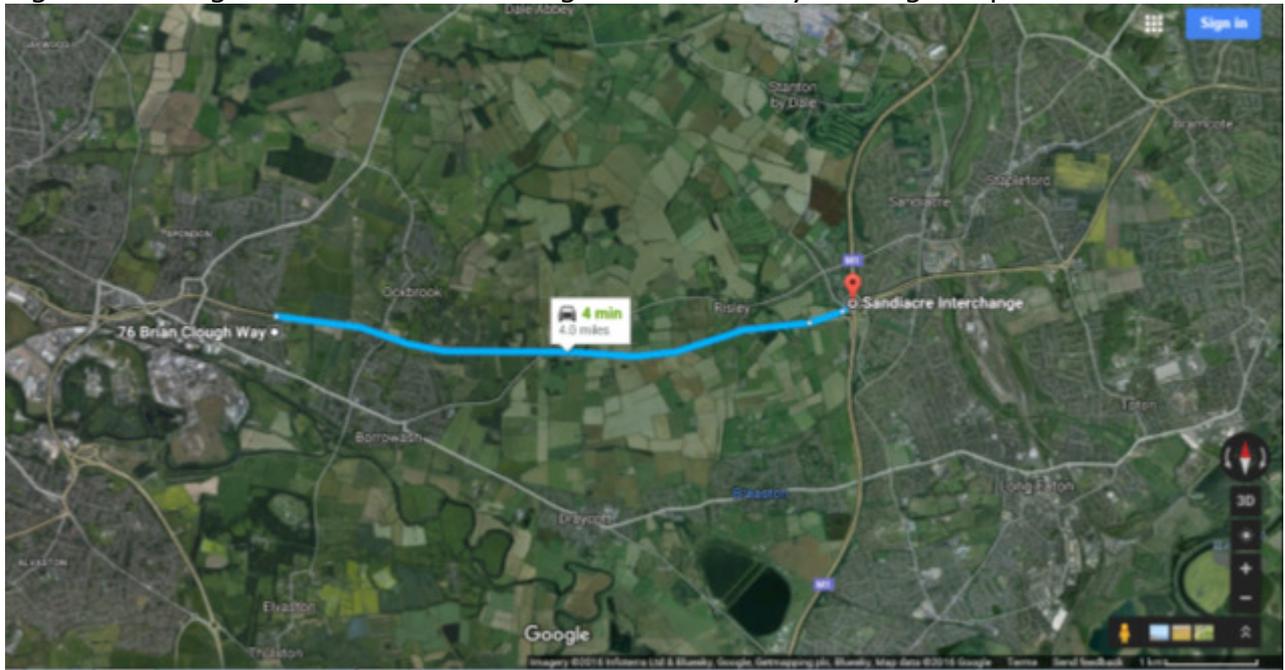
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When the proposed development at Eastern Green is factored into the equation the gap does not reduce. The only reducing influence on this gap is the creation of the High Speed 2 Station east of the NEC at the Stonebridge Interchange. This area of development has been supported in principle by Solihull Council who have promoted a sizeable development of new homes and employment space to compliment the high speed interchange. This scheme is commonly referred to as UK Central. This relationship is again shown in figure 1. The development of this scheme will reduce the gap by approximately 1mile meaning it will be amended to approximately 4 miles. By comparison this will be broadly similar to the gap between the principle urban areas of Derby and Nottingham (see figure 3). We consider this example due to its similarity with 2 primary urban areas joined by a strategic A-road and with smaller, more isolated settlements situated between them.

Figure 3: Google Earth view of Nottingham and Derby strategic separation area



In terms of the full extent of the Meriden Gap and the Green Belt evidence, we acknowledge that the Green Belt reviews do raise some concern about the possible reduction of this gap and impact on its wider setting. This is particularly true of the 2009 study. We are also mindful of the concern raised as part of our 2009/10 Examination. Notwithstanding these concerns we recognise that in relation to the proposed development at Eastern Green our 2007 Green Belt assessment identified the southern part of the site as having potential for development. We are also mindful of the lower scoring within the 2015 study (with regards purposes of Green Belt) and the recognition of urbanising features that exist towards the north east part of the site around the golf course and the hotel. In addition we also note the Meriden business park which extends along the northern edge of the A45 and the presence of the hotel which creates an

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urbanised environment along at least half of the sites frontage. In addition we draw attention to the Land Rover dealership at the top end of Pickford Green Lane which provides a notable urban frontage in this location. Furthermore, we are aware of the views of Coventry's urban area, in particular the spires and higher rise buildings to the east and southeast that exist when entering the city along the A45. As such, this area creates a clear gateway location and sense of arrival within Coventry well before you reach the Coventry Hill hotel or the A45 junction with the A4114.

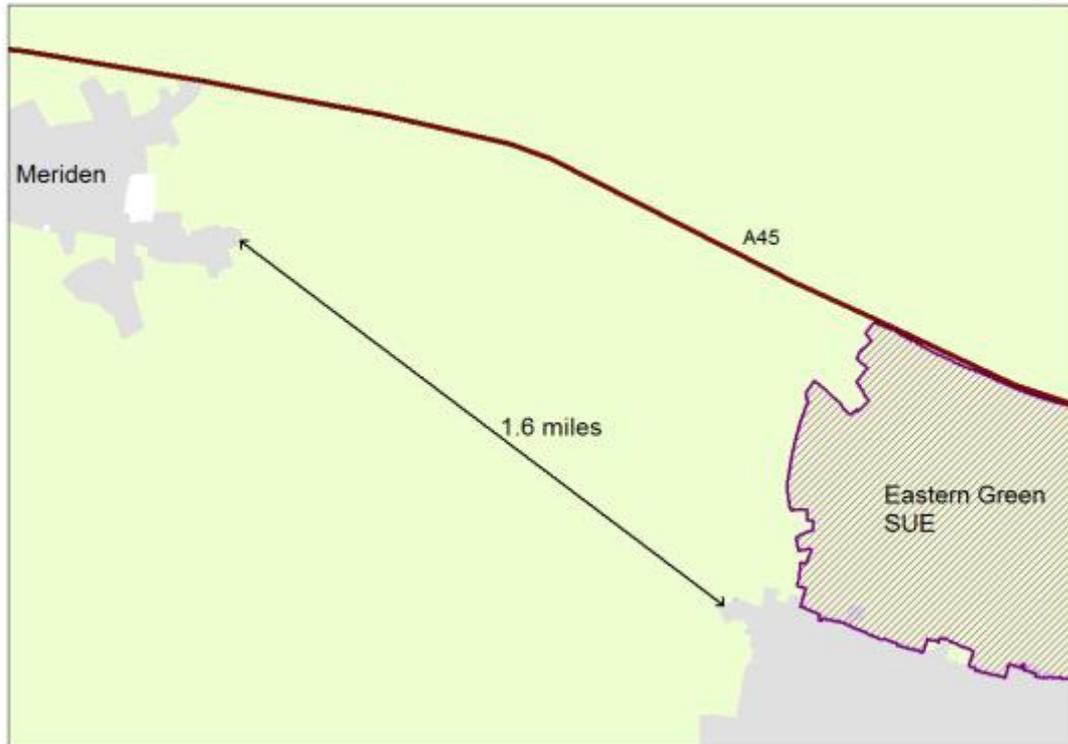
As mentioned above we are mindful of the concerns that were raised in the 2009 Core Strategy examination with regards the possible impact on the Meriden Gap. We are also mindful however of the level of growth now identified for the city, changes in alternative site options (some of which have already been developed) and less comprehensive proposal that was considered in 2009 relative to that presented today. As such there has been a significant change in circumstances and a very different climate of housing need within which any impacts must be considered. In this respect we have regard to the Indicative Master plan work submitted by Oxalis Planning on behalf of Hallam Land Management (LP58) and in particular their commentary relating to the Meriden Gap on page 20 and Appendix A.

This concludes that: "the study therefore demonstrates that a high quality expansion proposal (contained within appropriate Green Infrastructure framework based on the existing landscape structure) northeast of the established settlement area of Eastern Green can be brought forward without any material detriment to the Meriden Gap. Crucially, the actual direction of growth would not reduce the physical or visual separation between the western extremity of Coventry and Meriden itself. The separate identity of Pickford Green can be successfully protected as part of a green buffer zone defining the north western extent of development". Having regard to this, we pay particular attention to the need for important green infrastructure and the opportunities it presents. This forms a key part of the policy basis behind this allocation and its recommended density and capacity.

Coventry to Meriden

To supplement the above considerations we also have regard to the relationship to Meriden itself. The map below (figure 4) shows the distance with and without the proposed development. This again uses the junction of Church Lane and Manderley Close on the western edge of Coventry to the junction of Church Lane and Birmingham Road on the eastern extremities of Meriden. This shows how the current gap is approximately 1.6 miles at its narrowest point. It also shows that as the Eastern Green SUE does not impinge upon this western point and that the gap is not reduced. This point is amplified when we consider the requirement for green infrastructure along the Pickford Green boundary to help 'soften' the proposed development to the wider Green Belt beyond.

Figure 4: Relationship between Coventry and Meriden



We note however consultation responses which have suggested that the perceived impact could be greater based on aerial and other visual views. These concerns relate also to the gap to greater Birmingham and a concern that Coventry will merge with the Greater Birmingham conurbation. As previously highlighted we draw attention to our on-going work with Solihull Council to ensure that a strategic gap between Coventry and Solihull will always be retained. We consider this a vital component to our on-going responsibilities through the Duty to Cooperate (in respect to the new Solihull Plan) and confirm that the retention of a strategic gap and the retention of the city's own unique identity are of the utmost importance to the Council.

Furthermore and in the case of Meriden in particular we are also mindful that when travelling away from the city towards Meriden or towards the city away from Meriden along the A45 that the village is not visible from the highway. The village is also not visible from the western edge of Coventry and vice versa. Through our assessment we have considered the most significant risk of impact upon this gap to occur should development extend beyond the western most edge of Coventry. In this regard we are mindful of the assessment of parcel C24 in the 2015 Green Belt study, which focused on the area of land directly to the west of the junction of church Lane and Manderley Close. The assessment of this parcel highlights that "There are no significant boundaries present that would prevent encroachment of development into the countryside" This highlights the importance of securing firm, clear and defensible boundaries at this part of the

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Green belt and ensuring development is managed in an appropriate way to prevent urban sprawl or uncontrolled encroachment into the countryside beyond Church Lane and Manderley Close.

Coventry to Balsall Common and Berkswell

The map below (figure 5) shows the south west edge of Coventry and the eastern points of Balsall Common and Berkswell. The map also shows the western edge of Burton Green which sits just south of the Coventry boundary. We note that we have already highlighted this consideration within our response to question f at Hearing Session 6, however repeat it here for ease of reference and relevance. As such, and to clarify, this part of our response now relates to the proposed site at Cromwell Lane (H2:8) and its potential impact on the Meriden gap.

“In terms of the sites relationship to adjoining towns and villages, we note that the Joint Green Belt review highlights a 1.7km (1.1 miles) distance between the centre of the wider parcel and Berkswell train station. Looking at the site in more of a local context we note that at the current time the narrowest point between the eastern most point of Balsall Common (around Waste Lane) and the western most point of Cromwell Lane (in the proximity of the allocation site) is currently 2.3km (1.4 miles). Should the allocated site be built out to the city boundary (which is not being proposed but offers a worst case scenario) this gap would reduce to 2.1km (1.3 miles). To place this in context the western most point of Burton Green (Hodgetts Lane) is currently 1.6km (1 mile) away from the eastern most point of Balsall Common.”

These distances are shown on the map below for reference purposes.

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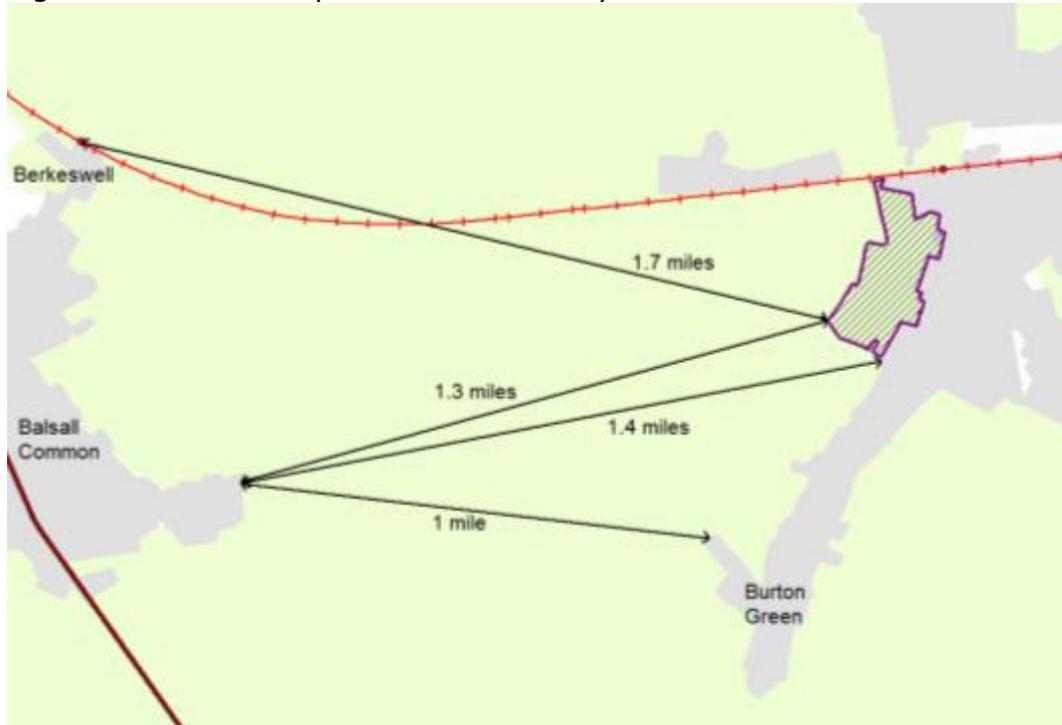
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Figure 5: Relationship between Coventry and Balsall Common



In terms of the relationship to the Greater Birmingham, this is less comparable at this point of the Meriden gap as there is no direct road connection in the same way as there is at the A45. The map below however (figure 6) does show the gap for reference purposes. This highlights a gap to the M42 at Solihull of 6.3 miles.

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Figure 6: Relationship between Coventry and Solihull via Balsall Common



In relation to the Green Belt assessments we note that the 2009 Green Belt review considered the site as a least constrained parcel. Although concerns were raised about this in the 2009 examination we believe the proposed woodland planting and reduced density and capacity of the scheme help to overcome these concerns and generate far lesser impact on the wider Green Belt at this location as a result.

We are also mindful of the relatively shorter distances between the edge of Coventry and Balsall Common, relative to those discussed above to Solihull. This reflects the smaller nature of Balsall Common and in relative terms the smaller nature of the gap that already exists between the 2 areas, which would not be reduced by development.

Coventry to Hampton in Arden

We have not provided a separate map of the relationship to Hampton in Arden as it is situated along a similar longitude to the NEC (only further south). Its relationship to the proposed development at Eastern Green is therefore very similar to that discussed above but if anything even less significant due to the lack of direct highway connection. For reference the gap is currently 3.8 miles and remains unchanged by the proposed development. In relation to the proposed development at Cromwell Lane, the impact is again significantly less as is situated beyond Balsall Common and Berkeswell without a direct highway connection. For reference the distance is approximately 4.4 miles. Both distances are shown on the map above (figure 6).

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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?

In respect of the proposed Keresley SUE, the Council suggests the following assessments provide adequate justification for the selection of Green Belt areas.

Sustainability Appraisal:

Whilst not wanting to repeat matters covered in Hearing Session 1, the options considered as part of the Coventry Local Plan were developed and informed by previous consultations and options going as far back as 2005. Inevitably, this has meant that the plan preparation process has not been straightforward, because it has had to respond to changes in planning legislation, Government policy, new and frequently updated evidence and case law.

The options that were assessed included mechanisms to deliver Coventry's development needs during the plan period. A comprehensive analysis of the spatial options was carried out against the sustainability framework objectives. In particular, the proposed Keresley SUE area in its entirety was specifically appraised through the SA process. Please refer to Appendix 1(e) of the SA/SEA Report, 2016 (LP8).

In summary, the maps below show how the assessment of constraints were considered as part of the SA/SEA process which has led to the selection of the area proposed for the Keresley SUE. The Council's suite of evidence base reports provide a clear understanding of many areas that are constrained by several environmental assets including, Flood Zones 3 and 2, SSSIs, LNRs and ancient woodlands which have placed further restrictions on how much land could be considered.

The maps below provide a graphical illustration of the environmental constraints in Coventry, through a staged sequential process that has been employed in identifying areas least constrained.

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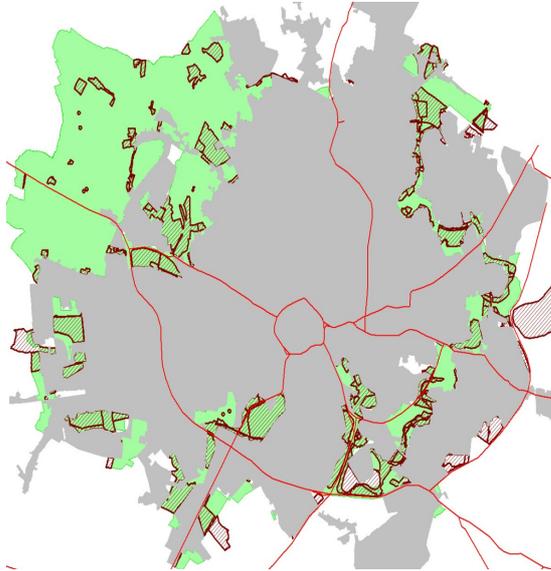
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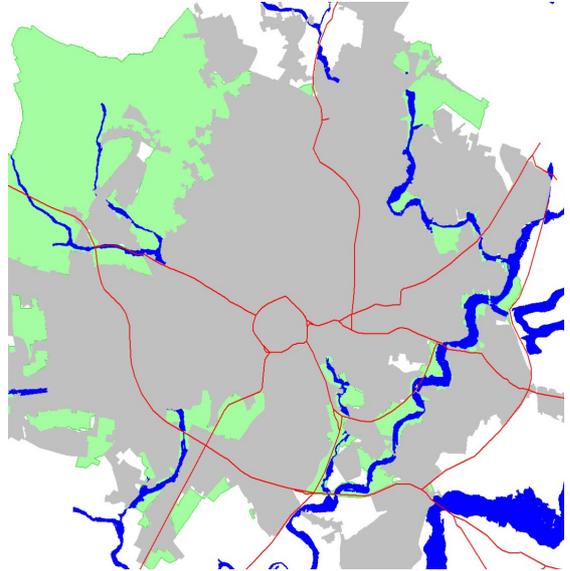
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Environmental Designations
SSSI, LNR and ancient woodlands

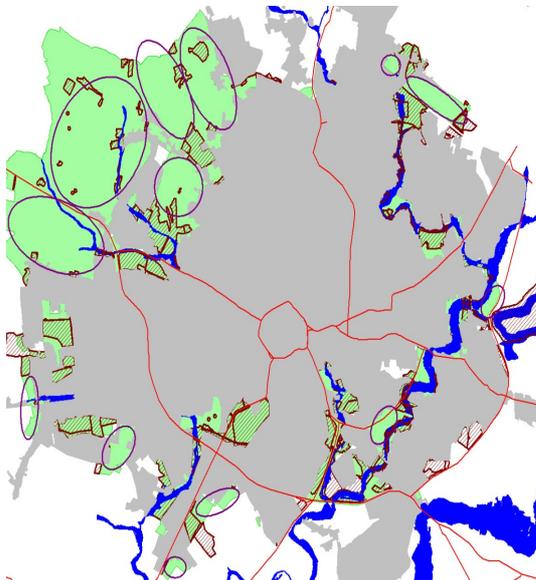


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Flood Zones 2 and 3

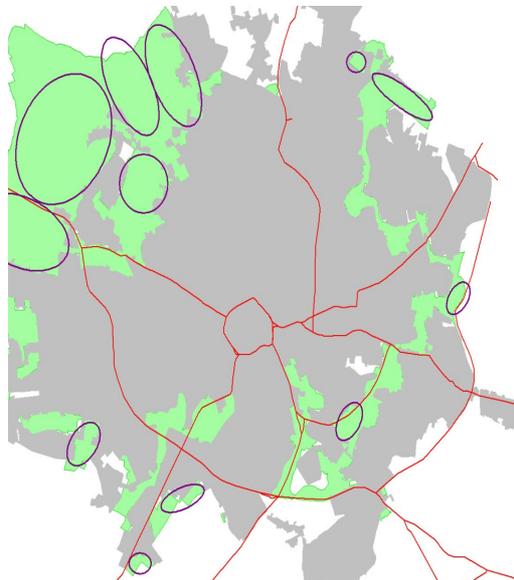


Combining Constraints



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Land availability



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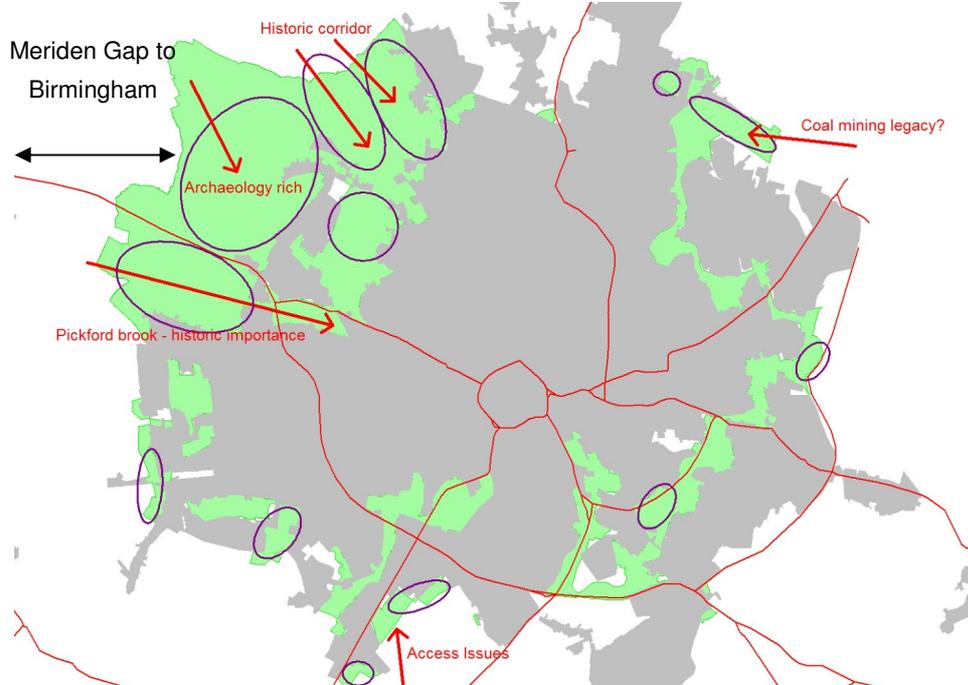
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Further constraints



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The Council's suite of evidence has also combined many of the environmental constraints to form a Green Belt matrix assessment (LP77) which includes an assessment of all Green Belt parcels currently designated in Coventry. This evidence base focuses on four key areas which include;

1. Historic Environment Record and Characterisation Study;
2. Sustainability Appraisal/Strategic Environment Assessment;
3. Joint Green Belt Review; and
4. Coventry Green Belt Ecological Report.

They all form the basis of the Council's intelligence and evidence regarding the selection of land for strategic development allocations, including the Keresley SUE.

Transport:

A comprehensive suite of bespoke transport assessments were carried out specifically focusing on the Keresley area. These included traffic counts V CASM baseline along the Tamworth Road and the results are set out below.

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Road	Direction	Time Period	Average flow from recent count	CASM 2013 base flows	Count year
Tamworth Road north of Long Lane	Northbound	08:00-09:00	311	260	2014
Tamworth Road north of Long Lane	Southbound	08:00-09:00	662	271	2014
Tamworth Rd north of Waste Lane	Northbound	08:00-09:00	413	163	2015
Tamworth Rd north of Waste Lane	Southbound	08:00-09:00	459	188	2015
Tamworth Rd south of waste Lane	Northbound	08:00-09:00	No count data available	390	No count data available
Tamworth Rd south of waste Lane	Southbound	08:00-09:00	No count data available	479	No count data available
Sandpits Lane east of Tamworth Rd	Eastbound	08:00-09:00	304	362	2013
Sandpits Lane east of Tamworth Rd	Westbound	08:00-09:00	262	445	2013
Long Lane north of Brownhill Green Rd	Northbound	08:00-09:00	256	384	2015
Long Lane north of Brownhill Green Rd	Southbound	08:00-09:00	411	452	2015

Red box = Actual traffic count

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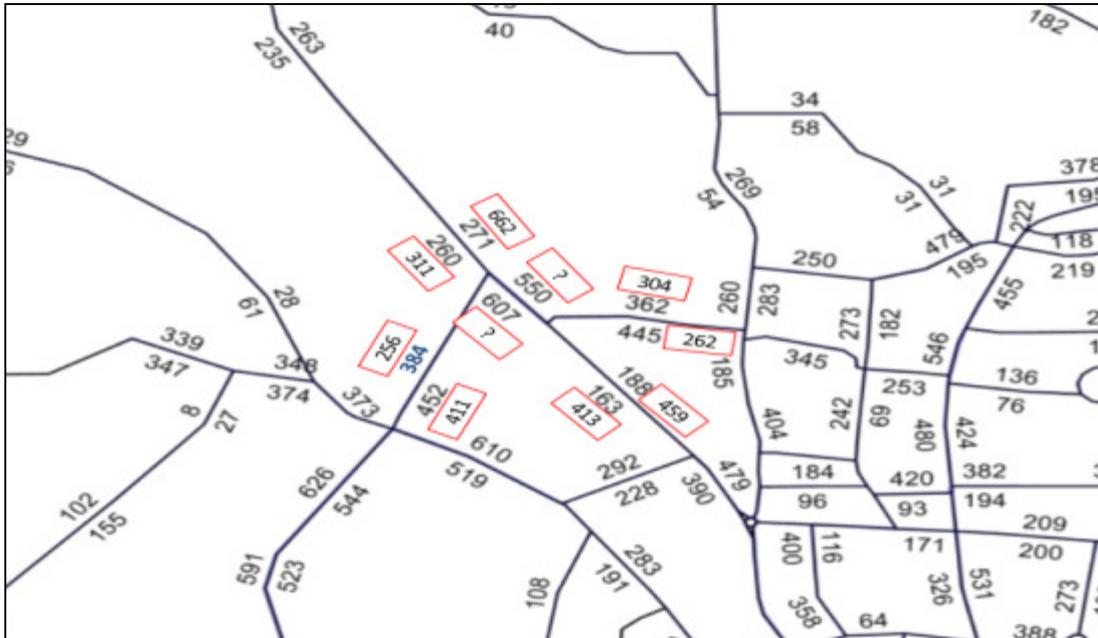
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As previously discussed at earlier hearing sessions, the modelling took place in relation to the existing committed and planned development using the Coventry Area Strategic Model (CASM). The model was updated and calibrated using a 2013 baseline and has modelled various scenarios up to 2031 with a number of committed and planned highway mitigation measures in place. Account is taken of new development within and potentially adjacent the city boundary. The model is multi modal and concentrated on the highway impacts.

The initial highway modelling scenarios were run on a 'worst-case' basis to fully understand the potential impacts from additional vehicular traffic. Therefore no adjustments for demand management, peak spreading, increased public transport patronage or increased walking and cycling were made to the vehicle trip generation assumptions. The promotion of sustainable modes forms a fundamental part of the Local Plan strategy which seeks a 10% modal shift away from car use in addition to the use of new technologies to promote Smarter Journey planning, electronic payment and more flexible and agile working practices. Based on 2011 census data, only 17.7 % of the city's workforce currently travels to the city centre for work purposes. This has reduced by 11.5% since 2001. From the Keresley SUE site, 3,100 new houses would generate 1,680 vehicular trips in the AM peak hour. This is anticipated to be the equivalent of 1.4% of total trips on the Coventry network in the AM peak in 2031. The model shows that traffic would disperse fairly evenly when leaving the site in the morning peak hour, primarily eastward to the A444 /M6, the south west towards Coundon Wedge Drive / A45, south towards a range of local

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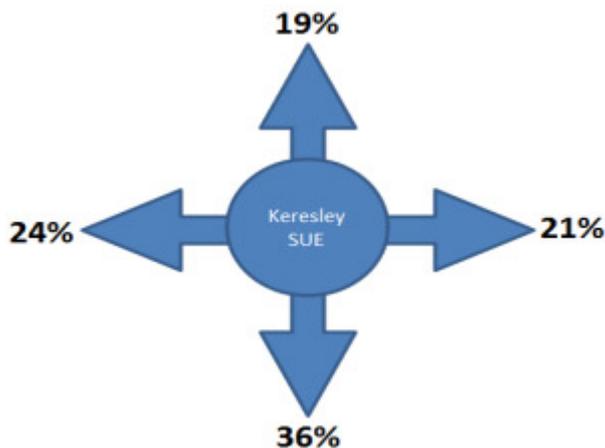
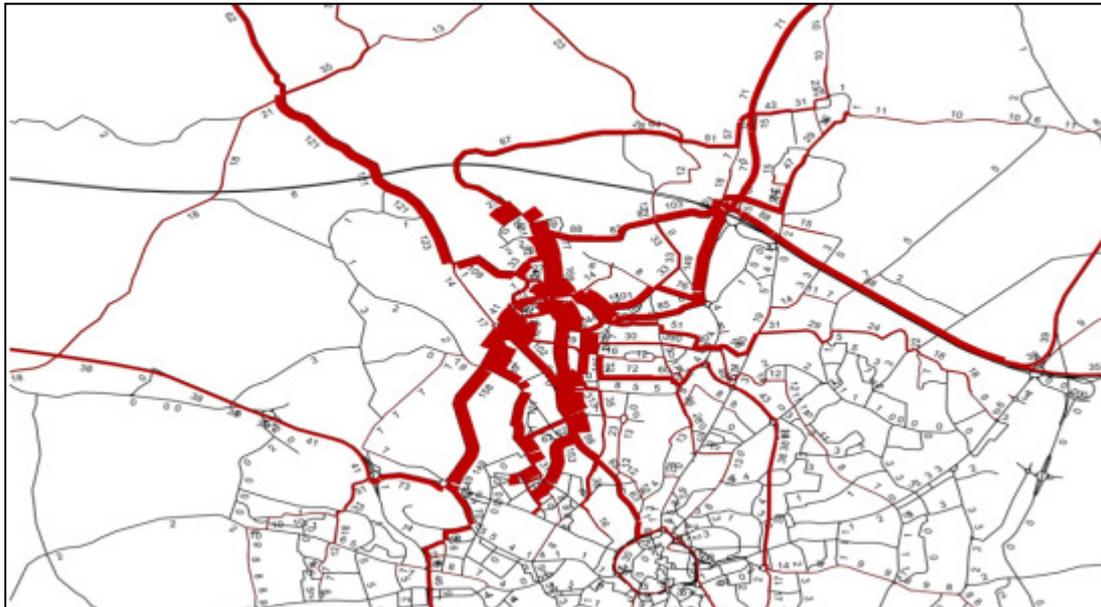
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destinations and north including the B4098 Tamworth Road. The approximate distribution is summarised as:



The model showed that the new road links, including the Keresley link road and other planned and committed road improvements in the wider area, including the A444, A45 and A46 would make those routes more attractive to drivers, thus some redistribution of traffic is expected in the area which would serve to reduce the impact of increased trips generated by the SUE site.

Of all vehicle trips leaving the Keresley site in the morning peak hour (08:00-09:00):

- Only 4% of trips are expected to travel along the full length of the B4098 Radford Road corridor up to the ring road / city centre. This equates to a total of 63 trips on the southern end of Radford Road in the AM peak. This

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- represents only 6% of all traffic on the southbound Radford Road at its southern end in 2031.
- 6% of traffic is expected to use the southbound section of the B4098 Tamworth Road south of Sandpits Lane which equates to 102 vehicles or 33% of all traffic on this section of road in 2031. The amount of traffic tails off towards the south as it disperses on to other routes or as it reaches its destination.
 - 17%, one of the largest flows leaving the site, will be southwards towards Long lane and Coundon Wedge Drive. This equates 289 vehicles which would make up 16% of southbound traffic on Coundon Wedge Drive in 2031.
 - Around 9% will travel eastwards to use the northbound A444 through the use of various routes, including Hen Lane and Winding House Lane. This equates around 150 vehicles making up around 6% of northbound traffic on the A444 in 2031.
 - Around 10% will travel south along Bennetts Road South to join Keresley Road. This equates to 160 vehicles which would make up 25% of southbound all vehicles on this route in 2031.
 - Around 7.3% of vehicles will travel northwest along the B4098 Tamworth Road which equates to 123 vehicles which would make up 23% of northbound traffic in 2031.

It is important to stress however that this assumptions and projections represent a current snap shot in time and will need to be closely monitored and assessed as the different phases of development come on stream and progress through the planning system. Policy AC3 supports this approach in terms of travel planning and assessment at the application stage. This is expected to be especially relevant to the Keresley SUE as the scheme is likely to be developed in phases. This is already being seen through the approved Lioncourt scheme and the proposed Barratt proposal.

Education:

Thorough assessments were carried out by the Councils Education team – in its role as Local Education Authority and it was considered that the following educational facilities were required to support the Keresley area.

- Two new primary schools alongside offsite contributions to expand existing local schools. Both primary schools would be 2 form entry.
- One new secondary school to support the North West corner of the city. This would be 8 form entry.

These requirements are specified in the Infrastructure Delivery Plan and Policy H2 of the Local Plan.

Sewerage and Drainage:

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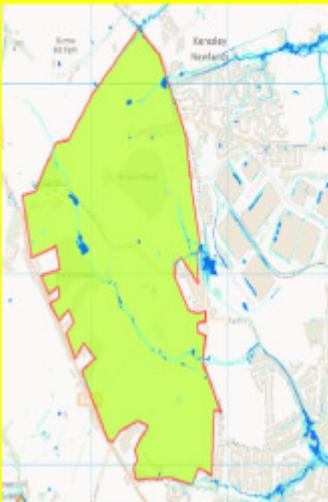
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The 2015 Water Cycle Study found that the proposed Keresley SUE is located approximately 300m from the catchment of Corley WwTW, and accommodation of some of this growth at Corley WwTW could alleviate pressures at Finham WwTW. However the scale of the growth within the Keresley site indicates that existing WTW consent limits at Corley WwTW will be unlikely to accommodate all growth at the site. Investigation by Severn Trent Water, when development is confirmed, will identify the suitability of Corley WwTW to accommodate growth from wider Coventry City.

In respect of the overall drainage issues, the Water Cycle Study set out the following issues:

Strategic Site	Dwellings	Description of Modelled Surface Water Flood Risk on-site	Current Planning Status	Identified Surface Water/Drainage Issues Identified in Previous Studies	Modelled Surface Water Flood Risk (dark blue = 1 in 30 year, light blue = 1 in 100 year, turquoise = 1 in 1000 year)
Keresley SUE	3000	Small areas of surface water flood risk are modelled around the small watercourse that runs through the site and a large area of potential deep surface water flooding exists at the eastern boundary of the site along Bennets road. There is a culverted watercourse beneath the road which indicates there is potential for in combination events of impeded drainage, surface water runoff, and fluvial flooding. Sequential approach to set development back from risk areas.	Granted	A DIA will be required for this site to assess the appropriate SUDS techniques that should be adopted for the site to achieve Greenfield runoff rates with a minimum reduction of 20%, to ensure no worsening of existing flooding problems elsewhere. Adoption of SUDS is critical to ensure that the development does not exacerbate flood risk elsewhere, and should be reviewed at the masterplanning stage, specifically the space required in the site for SUDS. It is important that a strategic approach to SUDS adoption is applied to the entire site.	

These issues can be supported through the Environmental Management policies set out in the Plan and are forming a key component of our Design Guidance work in relation to the Keresley SUE in particular.

Health:

The Councils work with its own public health team as well as NHS England and the Coventry and Rugby CCG have indicated that the proposed SUE at Keresley would generate a need for the creation of a new health facility in order to ensure enhanced service provision within the local community. To confirm, this is detailed in the Councils Infrastructure Delivery Plan.

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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?

In relation to the distributor road at Keresley, it is expected that the road would sit entirely within the proposed SUE. As such none of the initial road itself would feature within the Green Belt, assuming the Plan is adopted as proposed (in the context of the SUE boundary at least). As such it would not have any further impact upon the remaining Green Belt.

Considering the wider strategic upgrade of Long Lane, then we would confirm that this road would remain within the Green Belt, and may be subject to widening. Likewise any additional upgrades to the M6 Junction 3 could also have an impact upon the wider Green Belt by virtue of the relevant junctions or carriageways technically sitting within the policy designation. As previously discussed in earlier hearings, such works would remain subject to policy review and delivery in the Nuneaton and Bedworth Borough Plan and are considered longer term proposals. Furthermore though, we would highlight section 90 of the NPPF which clearly identifies "local transport infrastructure which can demonstrate a requirement for a Green Belt location" to be "not inappropriate in the Green Belt". In this circumstance it is clear that the upgrading of an existing highway network, which in itself already provides an urbanising feature within the wider Green Belt, could only be provided through the use of said existing network, therefore a Green Belt location would be essential.

In the context of the grade separated junction on the A45 we consider the same circumstances to exist. We would acknowledge that this site is slightly more complex than the Keresley situation given the need to utilise a small area of land north of the A45 to support the grade separated junction and supporting slip roads. As such, we did consider the removal of land from the Green Belt to the north of the A45. We felt however, that this lacked clear defensible boundaries and would be unnecessary in the context of the proposed development (which remained focused to the south of the A45). We also considered the utilisation of an at grade junction but felt that this would impact significantly on traffic flows, causing traffic to queue back on the A45 in both directions to support the movement of traffic in and out of the Eastern Green SUE, especially at peak times. As such, this would cause greater implications for noise and air quality to residents within the area.

On balance therefore we felt that a grade separated junction offered the most sustainable and robust access arrangement and would have limited impact on the wider Green Belt. Through appropriate planting of the slip roads and having regard to the presence of the A45 in general the openness of the Green Belt would not be compromised, whilst the purpose of including the land within the Green Belt in the first instance would not be weakened as the A45 would form a primary buffer between the urban area and the wider Green Belt. Furthermore,

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the presence of motorway or A-road slip roads within the Green Belt are not uncommon and indeed local examples exist at Corley and Meriden without impacting on the openness or purposes of the Green Belt

Lastly we would again highlight the relevance of Para 90 of the NPPF in this regard. Given the importance of retaining the A45 as a permanent and prominent boundary to the wider Green Belt in this location and given the importance of securing appropriate and sustainable access into the SUE, we would consider the completion of the grade separated junction to be reflective of local transport infrastructure which demonstrates an essential requirement for a Green Belt location.

We have considered the identification of both pieces of highway infrastructure on the policies map; however given neither have a concrete location or route we felt that the identification would only be indicative and therefore carry little weight. Instead we have focused on the broad principle within the policy and the IDP instead of a formal route. In both cases we would expect the final location to be supported through the Masterplan proposals that are developed for each SUE.

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?

The primary areas where land would lose its existing Green Belt designation but would not be proposed for developments would be within the SUE's, primarily at Keresley. This would principally relate to the ancient woodlands and the land between them (focused around Hounds Hill). This reflects the areas historic character and visual importance to the wider Green Belt. It also offers an opportunity to provide a key green infrastructure focus within the wider SUE. The land has been removed from the Green Belt due to consideration around defensible boundaries and appropriate Green Belt designation. Through the completion of comprehensive Master planning though and reference to the other policies within the Plan we remain confident that the area would remain protected.

Through the development of a Master planning principles policy though we will explore the possibility of strengthening this specific area of protection as a key design component of the SUE. This would build on the policy approach already in place within the Plan as a whole but would help clarify this within the Principles policy.

In relation to land at Eastern Green, we have given further consideration to the discussions at earlier hearing sessions and the representations made to the hearing. As such we have prepared a slightly amended boundary for the Eastern Green SUE in so far as it relates to the Pickford Green Boundary (see Appendix 1

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of this statement). This does not affect the Green Belt aspect in this location but would bring the remaining land parcels into the SUE boundary instead of leaving them as white land. Through the Master planning principles policy we would seek to strengthen the importance of a green buffer along this area (reflecting existing local plan policies) and as such, would consider these additional plots to be primarily included in the SUE boundary for this purpose as opposed to being developable.

We consider this approach would, in this instance, strengthen the soundness of the Plan and ensure the appropriate and intended green infrastructure at Pickford Green Lane would be fully secured through the overarching Master plan.

Other areas of land removed from the Green Belt are areas allocated entirely for housing or employment development and are highlighted in GB1, H2 and JE2.

Other areas are to be redefined (as appropriate) as a Local Green Space, which are highlighted in part 3 of policy GB1. We have proposed some modification to policy GB1 and its supporting text to add clarity to our approach to Local Green Space and its future consideration. It had initially been our view that this would be managed through NPPF in this regard but following consultation responses etc. we felt it more appropriate to embed this approach within the Local Plan to add clarity and certainty to applications throughout the Plan period.

The only other areas completely removed from the Green Belt are areas which are either already developed or which do not serve either purpose (of Green Belt or Local Green Space). The 2 principle areas are highlighted in part 4 of GB1. In addition we would highlight the proposed amendments to the Policies Map as shown in LP7, which responds to a range of consultation and engagement comments to provide a consistent approach across all of the Local Green Space proposals.

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

Yes. With regards to the management of the Green Belt and the potential for inappropriate development within it, we are mindful of the strong guidance contained within the NPPF. As such, we have set out in policy GB1 an approach which reflects the NPPF in terms of very special circumstances and inappropriate development as well as clarifying that those forms of development that may be appropriate in Green Belt are clearly considered in accordance with the NPPF and the Local Plan as a whole.

In addition we have positively considered opportunities for appropriate provisions within the Green Belt, including new outdoor sports facilities (linked to JE2:4) and appropriate local highway infrastructure (such as H2:2).

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?

It is our view that it is not necessary to specify the amount of land removed from the Green Belt within the policy or the supporting text. National guidance requires Local Plans to establish boundaries and set the framework for Green Belt policy. It also requires Local Plans to show where the Green Belt exists on the Policies Map, it does not require a Plan to specify how much of the Green Belt has been declassified or lost.

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

We consider that criteria 7 of policy GB1 is consistent with national guidance. The policy starts by stating that in addition to developments identified within the NPPF that would be 'not inappropriate' within the Green Belt, this suggests that what follows in the policy is over and above these considerations. In this context we are mindful that some limited infill development is acceptable within the existing Green Belt and subject to considerations of wider impact on openness etc. would not challenge that. What criteria 7 does however is seek to draw a specific focus over and above general infill housing to encourage and promote the delivery of starter homes and self-build opportunities. This reflects the locally specific ribbon developments we see in parts of the Coventry Green Belt and the small number of infill opportunities that could exist here.

As previously discussed in our responses to earlier questions around housing delivery and self-build provisions, the Council will seek to identify and utilise site recommendations where self-build and custom build options may exist (at site capacities below the 5 dwelling threshold in the SHLAA) and identify these within future SHLAA reviews. In the context of this policy opportunities may exist within the wider Green Belt to support this approach as acceptable development within the Green Belt (all things considered).

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?

As already referenced in response to question A, we would acknowledge that the heading on page 92 of the Plan (as submitted) (LP1) should say Exceptional Circumstances as opposed to Very Special Circumstances.

¹ NPPF paragraph 83

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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?

In seeking to positively redefine the city's green wedges away from Green Belt Policy and into Local Green Space policy we have primarily had regard to the recommendations and assessments of the Joint Green Belt review (2015). This is the first review of the city's Green Belt since the adoption of the NPPF, so the first time consideration could really be given to redefining these areas of 'Green Belt'. The first time national guidance has really recognised such an appropriate and realistic alternative that reflects the importance of green spaces within urban areas such as Coventry. Para 5.11 and 5.12 of the Review state:

"Much of the Green Belt within and close to the edge of the sub-region's urban areas plays an important role as 'green infrastructure'. This is particularly relevant in the pockets and corridors of Green Belt within Coventry (parcels C4, C11, C12, C17, C18, C21, C23 and C26), which not only make the City a better place to live, but also increases the sustainability of the City, promoting health and wellbeing, biodiversity and resilience to climate change. As noted in chapter 4, despite their positive uses, these pockets and corridors of Green Belt have little connection with the wider countryside around Coventry and, partly as a result, make a more limited contribution to the Green Belt purposes.

We therefore recommend that the City Council should consider the re-designation of these areas as 'Local Green Spaces'. The NPPF (para. 77) supports such an approach, although not specifically in relation to Green Belt land. Local Green Spaces are described as land of particular 'beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife' (NPPF para. 77). This describes these parcels very well and, through any appropriate Local Plan policy framework."

As such, we have had regard to the appropriateness of retaining these spaces under the Green Belt policy as they do not really reflect the purposes of Green Belt. In our view these areas, have outgrown the definition and fundamental purpose of Green Belt in so far as it relates to separation of settlements or the managed growth of urban areas. Where they still remain relevant however is in relation to their recreational, ecological and biodiversity value, with many areas containing sports pitches, river valleys, ancient woodlands, local wildlife sites and public open spaces. As such these areas provide a vital local amenity to local communities throughout the city. This was again something that was echoed as part of our consultation work undertaken on the Local Plan.

In this regard it is clear that further local benefit would be gained as the sites would be appropriately defined and become subject to a policy context that reflected their current use and value as opposed to their historic purpose or intention. Indeed, our proposed amendments to policy GB1, would also help to

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protect these areas further by restricting any forms of development to those which support the sites purpose as green space, hence ensuring a retained local asset and community benefit through enhancement of the area, whether it be through new community provisions to support outdoor sport or new play equipment etc. Lastly the use of an appropriate designation such as local Green Space would provide the areas with a revised focus and a purpose, helping to create greater community support and connection and providing a clear steer to promote and attract funding to improve local sports provisions and/or biodiversity value.

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?

We are mindful that the Green Wedge designations through Coventry were blanket designations which placed a policy consideration over an extensive area of land. The difference with Local Green Spaces is that the purpose of the designation relates to the green space or area of importance as opposed to a blanket policy steer over buildings and roads etc. The detailed mapping of the Local Green Space has suffered in this regard due to scale and cartographical error, the latter being picked up in the proposed amendments to the Policies Map in LP7, which built upon consultation responses and general feedback.

As such, we would acknowledge that much of the Local Green Space designation along the Sowe Valley does reflect tracts of land, but we do not consider them to be extensive or unrelated to local communities. These are areas of land that relate to different community groups along the north south corridor in the eastern side of Coventry, moving from Longford and Wood End at the north through Wyken, Walsgrave, Binley and towards Willenhall and Cheylesmore in the south. They are frequently broken by highway such as London Road, Langbank Avenue, Binley Road and Ansty Road. Notwithstanding we also note the PPG on Local Green Space which acknowledges that there are "no hard and fast rules about how big a Local Green Space can be because places are different". Furthermore it reemphasises the importance of extensive tracts of land not being designated as Local Green Space but highlights a linked example of open countryside adjacent to settlements. In our view this provides an emphasis on local circumstances and appears to relate more to areas of green spaces within urban areas where greater relationship and benefit can be associated with adjoining local communities. In the context of the proposals put forward by the city council this is clearly the case.

Part 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?**

Further to our response to part 1(A) of this statement we are of the view that exceptional circumstances exist to release some land from the Green Belt to support sustainable development within the city boundary but that the overall quantum of growth and site options that exist mean that these exceptional circumstances only stretch as far as the Plan sets out. To go further, would in the case of the other site options and wider areas, generate serious sustainability implications at this time.

In terms of reserved land options, we make reference to our proposed policy GB2 which identifies a number of areas to be reserved for the potential removal from the Green Belt. This is specifically linked to the development of the Warwick DC Local Plan though and is with the view to supporting the longevity of the Coventry local plan, helping it to respond to circumstances adjacent to its boundaries in an appropriate and joined up way. It also helps to manage the strategic issue of Green Belt in a positive and consistent way helping to manage our responsibilities under the Duty to Cooperate. In addition to the plots of land identified in policy GB2 though we do not consider a 'reserved land' approach appropriate elsewhere in Coventry as the relevant and exceptional circumstances are not mirrored in other locations.

- 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?**

The areas identified within policy GB2 are not necessarily identified for development. They are the focus of a separate policy which looks to manage their Green Belt policy designation in response to possible development proposals within Warwick District (namely at Westwood Heath and Kings Hill). Furthermore, the majority of these parcels are either already developed with educational provisions or low density housing or are covered by ancient woodland.

To help clarify the continued use of the sites we have proposed a small amendment to GB2 in relation to the education provisions at Bishop Ullathorne and Finham Park which clarifies that where these sites are in educational use they should continue in this use. This reflects their prominent location to support sustainable education provision as part of any development at Kings Hill in particular (should it be approved as part of the Warwick Plan).

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Should the sites be approved as part of the Warwick Local Plan we believe that the sites would form part of a comprehensive development proposal within the Plan period, but as far as the land use goes are expected to remain largely unchanged unless otherwise confirmed through the required Master plan etc.

As such to safeguard them in the context of the NPPF would delay their consideration as part of a comprehensive scheme until after the current Plan period adding further uncertainty and risk to the overall delivery of homes and infrastructure.

Furthermore, should the development proposals not be approved in Warwick's Local Plan then these sites would remain important components of the adjoining Green Belt.

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?

In considering our approach to GB2 we gave significant consideration to the requirements in national guidance. In relation to the parcels on the south of the city (identified in policy GB2) however we are faced with a unique situation in Green Belt policy terms. The parcels of land broadly represent a part of the wider Green Belt parcel but are separated by an administrative boundary (clear examples exist at parcels C20 and C14 in particular in the Joint Green Belt Review (LP70)).

In the round, the majority of land (within the Coventry boundary) is also already developed with either low density housing (south of Westwood Heath Road) or education facilities (at Bishop Ullathorne and Finham schools for example). The primary exception being the ancient woodland to the east of Kenilworth Road. The sites remain Green Belt though by virtue of existing defensible boundaries. Through our Duty to Cooperate workings with Warwick DC though we were mindful (at the time of preparing the Plan) that land to the south of the city was being actively promoted to the District Council and being considered as part of the revised Plan. As such, and as set out on pages 96 and 97 of our Local Plan, we have sought to prepare a policy position for these plots of land that would support any approved allocation by Warwick DC in this area. This helps to future proof the city's Plan in this regard. Not taking such an approach would have risked leaving Green Belt islands in Coventry which would have been completely in appropriate and indefensible in Green Belt policy terms.

We acknowledge the parcels could have been safeguarded in our Plan however given the need to accelerate housing delivery and meet housing needs we felt that such an approach could have constrained development in Warwick DC as it would continue to constrain land and infrastructure potentially necessary to

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support comprehensive development by delaying it and leaving it linked to future plan reviews – hence increasing uncertainty.

Having regard to the above, we would accept that an approach whereby land in the Green Belt is reserved for future release is not strictly speaking in referenced within the NPPF, however we do believe this approach reflects the principles of the NPPF, in particular Para4 as it supports and promotes sustainable patterns of development whilst also helping to meet the needs of Para 85 by ensuring that the Green Belt policy is appropriately managed to the south of the city both now and in the future. It also supports Para 14 as it helps our Local Plan respond flexibly and quickly to changes and site allocations to the south of the city (outside of the direct control of the city council). It also allows us to implement a presumption in favour of sustainable development in a comprehensive and holistic way with Warwick DC should their site allocations to the south of the city be deemed acceptable and adopted.

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

Both ourselves and Warwick District Council have set out an approach to possible development on the southern edge of the city (at Kings Hill and Westwood Heath). Both authorities have agreed in principle to the development to the south of the city so long as the infrastructure is delivered and utilised in a sustainable and appropriate way. To ensure this approach comes forward, both authorities recognise the need for comprehensive Master planning on a joint basis and/or the preparation of supporting policy such as an AAP or SPD. This is clearly referenced in Policy DS2 of our Local Plan.

In terms of specific delivery triggers these are specified in policy GB2. We consider the delivery of a comprehensive scheme or schemes to involve the adoption of a Local Plan in Warwick DC that allocates the adjoining land for development hence removing it from the Green Belt, coupled with the agreement by both authorities of a cross boundary Master Plan. This agreement could be secured through the granting of the necessary planning permission or via a separate policy based approach as outlined above). To support our experience of such an approach we would point towards the work undertaken on the Coventry Gateway / Whitley South and the University of Warwick planning applications in recent years which have involved successful and effective cross boundary agreements, planning consents and master planning.

Part 3: Green Infrastructure and Green Space

a) Is criterion 1 of Policy GE1 sufficiently precise in its meaning and is it clear how it would be implemented?

The Council, through its responsibility to maintain and protect its green infrastructure assets would protect such areas through its existing land holder arrangements. For example, the Council's parks and open spaces team maintain and manages a wealth of open spaces available for public use, 10 main parks and over 2,400 acres of open spaces spread across the city. Currently four of its parks hold a Green Flag Award, Coombe Country Park, Longford Park, Allesley Park and Caludon Castle Park.

Any areas that lie outside its sphere of ownership control would be protected through any relevant planning conditions and/or through formal planning designations. Opportunities may also exist to transfer land or secure maintenance payments through the section 106 process.

By creating a direct reference to the Green Infrastructure Study and Green Space standards, it ensure that the most up to date standards and site assessments can be applied to the decision making process. This provides the policy with clear flexibility and the ability to respond to changes in circumstances throughout the plan period.

b) Should Policy GE1 include specific measures to promote de-culverting within the City centre?

It is the Councils view that Policy EM4 of the Local Plan together with Policy CC9 as set out in the City Centre Area Action Plan adequately addresses the issue regarding de-culverting in the city centre. Therefore, the Council do not consider it necessary to repeat these provisions in Policy GE1 as suggested.

c) Should Policy GE1 include the improvement of water quality as a priority?

It is the Councils view that the Policy provisions as set out in Policy EM4 and proposed new Policy EM9, as set out in the SOCG with the LLFA and EA (LP99) adequately address the issues of water quality. Therefore, the Council do not consider it necessary to repeat these provisions in Policy GE1 as suggested.

d) Has adequate analysis been undertaken to support the proposed Local Green Space designations? In particular, has it been demonstrated that the proposed designated areas are

Coventry Local Plan Examination

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demonstrably special to local communities and hold particular local significance in line with the NPPF?

Yes. The Council would draw attention to its evidence base (in particular LP70 Joint Green Belt Review). Much of the Green Belt within and close to the edge of the sub-region's urban areas plays an important role as 'green infrastructure'. This is particularly relevant in the pockets and corridors of Green Belt within Coventry (parcels C4, C11, C12, C17, C18, C21, C23 and C26), which not only make the City a better place to live, but also increases the sustainability of the City, promoting health and wellbeing, biodiversity and resilience to climate change. Despite their positive uses, these pockets and corridors of Green Belt have little connection with the wider countryside around Coventry and, partly as a result, make a more limited contribution to the Green Belt purposes.

In using this evidence, the Council has therefore taken the decision to re-designate these areas as 'Local Green Spaces' (where appropriate). The NPPF (Para. 77) supports such an approach, although not specifically in relation to Green Belt land. Local Green Spaces are described as land of particular 'beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife'. This describes these parcels very well and we believe demonstrates that they are special to local communities and hold particular local significance. This has also been evidenced further as part of our consultation and engagement processes. Therefore Policy GB1 details their protection and security. This is considered again as part of our responses to other relevant questions in this statement.

e) How will the areas being removed from designated Green Belt be as strongly protected under the Local Green Space designation?

When considering areas as Local Green Space and re-designating them away from Green Belt policy, we gave significant consideration to how these sites would be protected longer term and in deed whether such a re-designation was appropriate, both in terms of the local area and also in terms of national guidance.

In preparing the Plan we felt initially that the policy approach was best reflective of national guidance, especially Para 77 and 78 of the NPPF and that land designated as Local Green Space would continue to be considered against the Green Belt policy set out in the NPPF and Policy GB1. Following the consultation period and further consideration of evidence however we have had regard to concerns being raised around a lack of clarity about what may or may not be acceptable within Local Green Spaces. Concerns suggested that without specific reference within the Local Plan itself that the level of protection afforded Local Green Space was unclear and could be miss interpreted in the local context. As

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such we have proposed a modification to Policy GB1 and its supporting text, which are identified on pages 96-99 of the modified plan (LP4).

This helps to create a clear link with very special circumstances being required to justify development within Local Green Spaces (as is required under general Green Belt policy) whilst also clarifying that ancillary forms of development that could be associated with the types of land covered by Local Green Space may also be acceptable in so far as they remain ancillary to the primary use of the land – i.e. the green space provision.

It is our view that the Plan as submitted created a clear link with national guidance in relation to how Local Green Space would be protected longer term. However, having regard to consultation feedback etc. we feel that the proposed modification in this regard would improve the overall soundness of this policy and its overarching approach.

f) Does Policy GE2 'Green Space' relate to Local Green Space, Local Urban Green Space, Green Infrastructure or other areas? Should 'Green Space' be further defined?

For the avoidance of doubt, Policy GE2 should refer to Local Green Space and the word 'urban' is a typographical error. The proposed deletion of the word 'urban' is set out in the Councils proposed modifications (LP4). It is the Councils view that both the explanatory text to the Policy together with the Councils Green Space Strategy, provides adequate definitions of Local Green Space in the Coventry context.

g) Does Policy GE2 provide sufficient clarity and certainty to applicants as to how they would demonstrate compliance with the policy requirements? Are applicants required to satisfy all 3 of the requirements listed under criterion 1?

The Council is of the view that Policy GE2 does provide sufficient clarity and certainty to applicants. It is acknowledged that the criterion listed under (1), should apply but that it would benefit from the addition of the word 'or' after each of the three criterion. This is suggested as a proposed change to add clarity to the Policy.

h) Policy GE2 proposes the provision of new replacement sports pitches resulting from the loss of pitches through the allocation of sites H2:19 and JE2:4. Would the replacement pitches be equivalent or better in terms of quality, quantity and accessibility and would any ancillary facilities lost be replaced?

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We would expect the replacement facilities to be secured through a linked planning application at the same time as the relevant development sites were brought forward. This would also be supported by section 106 agreements relating to the replacement facilities. This would help to ensure the requirements were actively being planned for.

In terms of quality and quantity, we would expect the re-provisions to ensure no net loss in either aspect, and if anything would expect a new modern, purpose made facility to be of a higher standard than current provisions.

With regards accessibility, the replacement facility for H2:19 is expected to in very close proximity ensuring that local accessibility remains intact. For example the sites are approximately 450m apart and both have frontage to charter Avenue. With regards JE2:4 the existing facility is more 'footloose' in nature. It is a school provision situated approximately 4miles from the school itself via a range of roads. The possible area of replacement provision is slightly closer in distance and accessible via a more direct highway route, helping to ensure it enjoys a closer link to the school than the current site.

With regards ancillary facilities neither site has significant provisions at the current time that could not appropriately be replaced and upgraded in principle within the new site. As such, we are of the view that both sites could incorporate appropriate facilities to support outdoor sport within the wider Green Belt or Local green space without conflicting with the purposes of including land under such designation in the first place.

i) Should the Local Urban Green Spaces be identified on the Policies Map?

As part of our proposed changes in LP4 we have sought to clarify that the word "urban" should be deleted where appropriate and that reference should instead only be made to Local Green Space. This reflects a typographical error and will ensure consistency with national guidance and aid clarity. As such, all cases of Local Green Space are shown on the Policies Map already (having regard to LP6 and LP7)

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Part 4: Any Other Matters

There are no further matters we wish to raise in this Statement.