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30<sup>th</sup> August 2016

**For the attention of Mrs Rebecca Phillips**

Re: Coventry Local Plan – Proposed development of Green Belt Land in The Meriden Gap.

Dear Madam

We write to register our objection to the above proposal and the impact that this proposal would have on the Green Belt, the local community and urban sprawl.

**General.**

Allesley Green Residents Association (AGRA) represents 600 homes on a housing estate adjoining Green Belt land on the western boundary of Coventry. This Green Belt Land forms part of what is known as the Meriden Gap. In addition, since the proposal we have been approached by residents in Eastern Green to also act on their behalf.

We are opposed to the proposal for a number of reasons.

Firstly, part of the Meriden Gap has already been conceded to development as a consequence of the expansion of Birmingham Airport, expansion of the NEC and also the proposed HS2 Hub to be built at Stonebridge. This has already reduced the green space between Birmingham and Coventry. Should Coventry City Council's proposals to develop this area in Eastern Green be approved this gap would be reduced even more with the joining of Coventry and Birmingham becoming a greater reality.

We ask that you consider the determination of the previous Government Inspector, Mr Nigel Payne. His examination into the Coventry Core Strategy dated 27<sup>th</sup> May 2010 concluded “that development should be sustainably focussed principally on a north/south axis, centred on the city, thereby protecting the strategically important Meriden Gap”

In addition, he stated “I confirm my agreement regarding land to the west of the existing urban area of the city, presently separating Coventry from Solihull and Birmingham (the Meriden Gap). This is to the effect that major development here would substantially reduce its largely open character and appearance and appear as urban sprawl by encroaching into the countryside in this sensitive and strategically important gap. Consequently, it should not be removed from the Green Belt or reserved for future development.”

We attach our analysis of pertinent points from the Inspector’s 2010 Report to this letter for your consideration. (See Appendix 1)

## **Current Considerations**

We have attended each of your review sessions to date and listened to the responses to your questions by the Council and the developers. We have listed below our observations and concerns of the responses that were presented to you.

- **Brexit.** The impact of the Brexit vote which implies that it is highly likely that immigration will decrease - migration being a major contributor to population projections going forward to 2031 will now need to be taken into consideration

Brexit economic analysts also predict a recession for the UK which would impact on employment and job creation which will in turn reduce the projected housing need stated in the Local Plan.

Inaccuracy of population figures which were legitimately challenged by more than one representative at the hearings.

The ONS data on which the population projections were made appears to project significantly higher population increase for Coventry than other surrounding cities. The impact of the student population which is now levelling out rather than increasing year on year as was suggested in the Plan.

Also, the Council in determining its housing projections appear to have ignored the fact that a significant proportion of housing is being bought by Buy to Let Landlords. The local Bannerbrook Development is a good example.

- **Brownfield Sites.** The importance of priority being given to building on brownfield sites. This is essential as once Green Belt Land is conceded it is lost forever.
- **Roads.** Development in Eastern Green would have a detrimental impact on roads leading to the city centre – specifically Holyhead Road and Allesley Old Road – which are currently bottlenecks that have little chance of being widened given that they pass under viaducts.

There appeared to be no awareness of the impact on local roads in Allesley Green and Eastern Green. Parkhill Drive is a Class 4a (unclassified Road) which has already seen pressure from the recently developed Bannerbrook Estate and a new roundabout on the A45/Broad Lane junction which some motorists choose to avoid.

Additionally traffic would almost certainly be forced onto two other roads, Broad Lane and Tile Hill Lane with consequent short-cuts being made through narrow estate roads joining the two. Many of these estate roads are already partially blocked by parked vehicles of residents. The impact would therefore not just be felt by local residents of Eastern Green and Allesley Green but by residents of the Broad Lane and Tile Hill areas.

- **Educational Provision.** A local secondary school has recently been closed in the area (Woodlands) and the council officers advised that it would not be their responsibility to provide educational facilities as part of their plan. However a school is identified in the developers proposals. This suggests that there has been no consultation with education colleagues.
- **Health provision.** Residents in the local Allesley Green and Bannerbrook Estate are still waiting for health provision. In the case of Allesley Green this was identified 30 years ago and has still not been provided for. The Council Officers were advised at the hearings that there are no plans by Coventry & Rugby Clinical Commissioning Group to provide GP facilities on this proposed site. Mainly due to lack of funding and the inability to recruit GPs to the city. Again this suggests lack of consultation with key stakeholders.
- **Retail & Warehousing.** Why are the Council planning to sacrifice prime Green Belt land for retail space and warehousing when it has already demonstrated its inability to attract businesses for the vacant shops and commercial units that are currently available in the city and surrounding areas?
- **Council Planning.** Over several decades planning applications in this area and immediately adjoining areas have been turned down by the Council on the basis that applications are on sites which, for example, “lie within a particularly vulnerable part of the Green Belt” or “would constitute

inappropriate development at the edge of the Green Belt which is not justified by very special circumstances” or “is located within the Green Belt and Ancient Arden Landscape and would result in a conspicuous and incongruous development”.

- **Golf Course.** The 55 page report on the Windmill Golf Course contains many facts and figures. We don't know whether most of these facts and figures are correct but what struck us immediately was the statement that there are no lady members. If that is so then why is there a specific parking space set aside for the ladies captain and why is there listed on the boards in the clubhouse, ladies champions and captains since before the beginning of the century up to 2015? We have been advised that there are indeed lady members. If such a basic statement is in fact incorrect, how much of the other information is to be relied on?

The report also mentioned that the course was unplayable for several months in the last year because of flooding. Many courses, including those regarded as "better" courses have suffered the same fate, suggesting that it was the weather, rather than the course, which was responsible. Even if it was not, then the flooding suggests that extreme care should be taken before building on the land.

Additionally why is such a facility to be considered "unnecessary" by reason only of the fact that there are other, and better, courses within several miles. Coventry has only two golf courses that enable golfers to pay and play. One is the municipal golf course at Brandon, which is on the other side of the city with the other being the Windmill course. The other courses within a few miles are members only clubs which require the payment of a joining fee and then an annual subscription. This is financially beyond the means of the majority of city residents who wish to play golf.

The golf course has also facilitated an increase in wildlife due to the creation of water features, including a lake with an island in the middle. This has led to an increase in wildfowl some who remain throughout the year and others who are seasonal visitors. The lake is also well stocked with fish and anglers have used the facility. The ecology of the area is well served by this facility.

- **Top 10 City.** It was confirmed that the expression “Top 10 City” in fact means “one of the 10 most highly populated cities”. The expression does not consider the well-being of current city residents.

We believe that the city would be better served by addressing the quantity, quality and affordability of housing its' current residents rather than providing ill-considered aspirational housing for a considerably larger population which might, or might not, arrive in the future?

These were just a few of the areas that were highlighted as being significantly flawed. Despite the fact that Coventry aspires to be a Top 10 city its local Employment Strategy's focus is to 'help people get jobs and to help improve the skills level of local residents' this is incongruent with the aspirational workforce that the Local Plan is expecting to come to live and work in Coventry.

- **Ecology.** We were disappointed with the report on the local environment which did not in any way reflect the varied and beautiful wild life which we are privileged to enjoy in Allesley Green and Eastern Green. We could list the flora and fauna that we see daily and it would form a significantly lengthy list. We have however chosen to comment on the report and to highlight some key omissions.

(See Appendix 2)

It is with the greatest of respect that we ask that once you have all of the facts before you, including the previous findings, that you uphold your colleagues' decision, and remove Eastern Green, the last remaining piece of green belt south of the A45 from future development.

Signed

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Allesley Green Residents' Association  
Chairman: Anthony Simons

## Appendix 1

### Analysis of pertinent points from Inspector's Report 2010

#### Issue 19

##### 3.86

*If the agreed sub-regional strategy is to be properly implemented and the relative economic decline of the Coventry/Nuneaton regeneration zone, particularly in relation to the more rural districts around, is to be reversed, then I agree with the RSS Panel Report that the city has to be the focus of substantial new housing, over and above its own locally generated needs, during the plan period. Taking into account all the available evidence, I also fully endorse the RSS Panel Report's conclusion that this growth should be sustainably focussed principally on a north/south axis, centred on the city, thereby protecting the strategically important Meriden Gap. It would also take advantage of planned investment in public transport improvements, such as NUCKLE 1 & 2, in this corridor*

**Comment:** Growth should be sustainable and focus on North/South axis, centred on the City, thereby protecting the strategically important Meriden Gap. This is supported by transport improvements, such as NUCKLE 1 & 2 in the North/South corridor.

**Comment:** The current circumstances for employment and population change are uncertain with a predicted recession as a result of the Brexit vote. Coventry City Council's current Employment Strategy has two main areas of focus: 'to help people get jobs; and to help improve the skills level of local residents'. This would suggest that the economic decline reversal referred to in 3.86 has not taken place. This employment strategy is incongruent with the aspirational workforce that the Local Plan is hoping to encourage into the city.

**3.157** *National Guidance PPG2 including that (paras 2.6 and 2.7) to the effect that boundaries should only be altered in **exceptional** circumstances.*

**Question:** Clarification as to what are the 'exceptional' circumstances that have deemed it necessary to include the land in Eastern Green/Allesley Green in the Local Plan, particularly in the light of the Secretary of State for Communities and Local Government's recent commitment to preserve green belt (see comment in 3.162)

#### Issue 33

**3.162** Referring to the Meriden Gap: *'This is to the effect that major development here would substantially reduce its largely open character and appear as urban sprawl by encroaching into the countryside in this sensitive and strategically important gap. Consequently, it should not be removed from the GB or reserved for future development'.*

**Comment:** This point has been unequivocally been reinforced in July 2016 in a statement by the Secretary of State for Communities and Local Government, Sajid

Javid. When asked by MPs whether he could give a guarantee that during his tenure that there will be no dilution whatever to the vital protection of the green belt – his response was ‘**that the green belt is absolutely sacrosanct**’ He added: “It was in the Conservative Party manifesto and that will not change. ‘The green belt remains special. Unless there are very exceptional circumstances, we should not be carrying out any development on it.’

Gavin Barwell, the recently appointed Housing and Planning Minister, also confirmed that most development on the green belt is “inappropriate”.

He said: “The government is committed to the strong protection and enhancement of green belt land. Within the green belt, most new building is inappropriate and should be refused planning permission except in very special circumstances.”

Mr Barwell reiterated the government’s commitment to building one million homes, which had been thrown into doubt following the vote to leave the European Union.

**3.164** *The fact that all representors, both supporting and opposing the allocation of sites, have been able to compare and contrast the conclusions reached in their comments indicates that no possible GB locations have been entirely overlooked. This reinforces my conclusion that, whatever their prospective advantages and disadvantages, there are no obvious areas of GB peripheral land around the city that have not been assessed in the CS process for their development potential. The outcome of that assessment in relation to specific sites and areas, including land at Eastern Green, is necessarily addressed separately elsewhere in this report. However, I conclude on this issue that, in general terms, the supply of suitable GB land within the city has been maximised, albeit my recommendations address some site specific changes.*

**Question:** Why has the parcel of GB land which houses the Windmill Golf Course now been included? The land grade is of the highest, i.e. 5. It is noted in the” Public Document” this has been downgraded. The vast majority of land is still of the highest grade even if a small part of the golf course is included... nothing has changed.

## **Issue 55**

**3.271** Visual and physical links to the Ancient Arden landscape could and should be retained and improved.

**3.275** *Nevertheless, I understand the concerns of local residents about the likely traffic generation on the present road network in the locality arising from this level of growth. However, I am persuaded by the available evidence that this could be satisfactorily addressed by other suitable measures, as set out in the SCG, without reliance on either of those schemes referred to above alone. These would include limited physical improvements, such as the bus gate at the railway bridge on the B4098, new and improved bus services and better cycling and walking links, all as part of an overall Travel Plan.*

**Comment:** The Inspector understood the concerns of local residents regarding transport generation on the present road network in the locality. Park Hill Drive is a 4a Unclassified road which has seen a significant increase in traffic throughout the

estate over the years – significantly so since the completion of the Bannerbrook Estate and an accident prone roundabout on the A45/Broad Lane junction which some motorists choose to avoid by driving through Allesley Green. This includes prohibited HGV vehicles.

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

**3.299** Local residents raise concerns over surface water drainage in the vicinity, particularly in the light of significant flooding in December 2008. They also draw attention to the presence of an important aquifer from the (permo triassic) sandstone said to be only a couple of feet or so below the land's surface at times, which historically provided water for the many local wells hereabouts. However, it seems to me that the most important consideration is the role that this land plays as part of the present GB on the western edge of the city within the Meriden Gap and where only about 1.5 miles separates it from the settlement of Balsall Common.

**Comment:** This supports the retention of the Meriden Gap and it remains unclear as to what has changed since the last Inspector's Report

**3.300** The Inspector acknowledged the clear views which extend in all directions and concluded that "development of this land would clearly amount to urban sprawl, encroachment of built development into the open countryside and the reduction of the Meriden Gap". He was equally sure that, as emphasised by its largely open aspect to the west and south west, with landscaped views representative of those described as typically "Ancient Arden", this land properly fulfils the purposes of GB designation

**Comment:** Avoidance of urban sprawl; encroachment of built development into open countryside and reduction of the Meriden Gap should remain a priority. The additional proposed inclusion of warehousing and office accommodation is deemed to be unnecessary given the number of units locally that are unoccupied.

**3.301** The Inspector stated that a housing development here would be an incongruent extension of built up development and an intrusion into the **important** Meriden Gap in a particularly **sensitive** location

**Comment:** An incongruent imposition to the Meriden Gap. This comment still applies – nothing has changed since 2010.

**3.302** The Inspector deemed it to be important that a firm and long term defensible new boundary be established on the western edge of the city, in accordance with guidance in PPG 2.

**Comment:** We are in agreement that there is a need for a definitive city boundary to be established. We also believe that if the decision is taken not to build on this land that the decision is legally formalised so that this land cannot be considered for development again in the future.

**3.303** *Moreover, it would also retain a swathe of GB land within the city boundary on the western side of the built up area to help maintain the Meriden Gap at one of its narrowest and most sensitive points. Accordingly, I conclude that the release of this site from the GB is not justified by the available*

evidence and that it is not suitable or appropriate for identification as a reserved new housing site.

**Comment:** This confirms that the release of this land from Green belt is not justified

**3.332** Consequently, *the reference to the Eastern Green, Keresley and Potter's Green Corridors should be deleted from policy EQ2. They would continue to be protected from inappropriate development by policy EQ3 in any event and thus formal GW/GB designation is not necessary. Although the policy wording referring to the GB boundary being realigned does not need to be altered, these recommendations will also need to be reflected on the PM.*

### **Issue 13A**

**3.386** *Although none of the area proposed for new built development lies within Flood Zones 2 or 3, according to the EA, drainage concerns remain regarding potential effects on the floodplain of the Pickford Brook in the north east corner of the site, as well as over the size of the culvert under the A45 to the east. However, any proposals would have to be subject to a site specific FRA that would include modelling of all the watercourses on the site, as well as assessing the capacity of the A45 culvert and the suitability of new crossings of the streams by the proposed access road to take storm water flows*

**Comment:** Proposed new development is deemed not to be within flood Zones 2 or 3 – however worth looking at Environmental Agencies flood plain map for CV5. Possible Flood Zone 3? There are clearly drainage concerns regarding potential effects on the floodplain of the Pickford Brook in the North east corner of the site and also over the size of the culvert under the A45 to the east. Modelling of all the watercourses and an assessment of the A45 culvert would be required and suitability of new crossings of the streams by the proposed access roads to take storm water flows.

**Question:** Has this been actioned?

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

**Question:** The developers have stated that they do not need to wait for this new road to be built before commencing work on the proposed development – can they advise where the alternative access will be?

**Question:** The Council Officers have advised that there will be cycle lanes which will join up with existing cycle lanes – can they please confirm where the existing ones are around the area?

**3.3.96** In the previous plan a new 500 space Park and Ride (P & R) facility was to be provided south of the A45. Both the P & R site and the new housing would be served by a new, high frequency, bus route to the city centre, together with other measures to discourage use of the private car by new residents, in accord with part A of policy AC1 of the CS. The Council accepts that, taken together, such measures would be suitable and appropriate for the development.

**Question:** Why is the high frequency bus service not already in place in order to alleviate current traffic volume into the city centre? The City Council have had six years to put this in place for existing residents of Allesley Green and Eastern Green. (There are a significant number of Coventry City Council employees living in this area).

**Question:** Could the Council Officers advise/confirm where the access for buses and emergency vehicles will be?

**3.399** Accordingly, I am content that this is a generally sustainable location for significant new housing in terms of reasonably good access to local services and facilities, including schools and shops, on foot and by cycle. This would be improved by associated on-site provision in a development of the scale envisaged, as recognised in the site specific SA. Notwithstanding, I share the reservations of the Council and local residents over the ability of the new occupiers of any new housing here to integrate well with the existing community and promote social cohesion, due to the absence of direct vehicular links.

**Comment:** Social cohesion concerns still apply. Eastern Green and Allesley Green are already considered to be very separate communities –mainly because there are very few community and social amenities locally. Allesley Green Residents Association and St Andrew’s Church Eastern Green are however proactive in bringing the community together where possible.

**3.401** Due to its relative narrowness hereabouts (less than 10km from the edge of Coventry to the NEC roundabout and less than 3.5km to Meriden), it seems to me that it is particularly sensitive to significant harm from losses of open, undeveloped, land at its peripheries, especially at that narrowest point. Consequently, I consider that any land lying directly between Coventry and Solihull and/or Coventry and Meriden itself, must be taken to lie within the Meriden Gap, in contrast to Keresley to the north west.

**Question:** What has changed?

**3.403** Moreover, the actual detrimental effect on the gap would be firmly reinforced by the clear public perception of a significant reduction in spacing between built up areas, particularly that arising from the visual intrusion of the new road splitting the otherwise undeveloped land south of the A45 and north of the Slipperside Valley. Therefore, I agree with the Council that it would be seen as, effectively, forming a new “urban edge” to the city. This would be strongly reinforced by the P & R site, including notably when lit at night, in comparison to the retained agricultural land to the west, which would be particularly prominent from important public viewpoints, and especially along the A45.

**Light pollution – this would still apply – we can already see light from Birmingham direction at night.** Many environmentalists, naturalists, and medical researchers consider light pollution to be one of the fastest growing and most pervasive forms of environmental pollution. And a growing body of scientific research suggests that light pollution can have lasting adverse effects on both human and wildlife health. **Refer to CPRE for advice**

**3.404** I also share the concerns that, unlike on other GB sites around the city, this proposal would not provide a new logical, firm and defensible, boundary to the GB, based on clear physical features once completed. Indeed, I consider it more likely that the presence of the new road would, almost inevitably, lead to further pressure for more land south of the A45 to be released for development in the future, in conflict with guidance in PPG 2 and the CS objectives.

**Question:** How would developers/council officers define the city boundary and what would be the delineation point between Allesley Green, Eastern Green and the proposed new development?

**3.406** I am also satisfied that this land contributes strongly to GB objectives in that it helps to prevent urban sprawl from Coventry, safeguards the countryside from encroachment, helps to preserve the setting and character of the Meriden Gap (if only in terms of its extent) as well as encouraging the recycling of previously developed land. The proposal would therefore conflict with these objectives.

**Comment:**

**Conclusion:** Urban Sprawl; Safeguards from encroachment; preserves Meriden Gap – all of these objectives still apply and should not be ignored. Again – what has changed?

**3.407** Importantly, and in common with the RSS Panel Report, I too consider that this area on the western edge of the city falls outside any north/south corridor on which major new development should be focussed, in order to fulfil the sub regional strategy. When its location within the strategically important Meriden Gap is also taken into account, it is clear that the judgements made in the JGBS regarding those sites that were “least worst” if new housing land has to be found in the present GB, should be supported in this instance.

**Comment:** This area falls outside of the north/south corridor and therefore not suitable or appropriate for development

## Appendix 2

We are puzzled as to the reasons why Bradley Murphy Design in Hatton were chosen to submit the report when Middlemarch Environmental, ecological consultancy, based in Meriden a company who have conducted many surveys on behalf of Warwickshire Wildlife in the local area and know the area well were not chosen. Secondly no reference to Warwickshire Wildlife who have a reserve at Harvest Hill and conducted environmental surveys looking for Water Voles along the Pickford Brook was made.

There are **5 Protected Species** :

**Great Crested Newts** - Harvest Hill, a Warwickshire Wildlife reserve site less than one mile from the Windmill Golf course with a pond full of Great Crested Newts yet we cannot find any reference to the site in section 3.2 *Statutory and Non-Statutory Designated Sites* listing local sites as far away as Coundon Wedge and Tile Hill Woods. The report makes reference to the possibility of Great Crested Newts being present when we have seen them in Pond P2 and the smaller pond P1 for ourselves. Concerns were raised a few years ago with the Windmill Golf and Leisure regarding the cleaning out of P1 when there were Great Crested Newts present. The report suggests further investigation needs to take place to establish the extent of their presence.

**Birds** – The report starts with the comment “Consultation with Warwickshire Biological Records Centre identified no bird records for the locality” and attempts to name a few common birds but we know there are far more species than those listed. What concerns us the most after noting they had heard a Skylark *5.3.5 No ground nesting species were recorded within the application site. The site was considered unlikely to provide nesting habitat for ground nesting species such as skylark due to the intensively managed grassland and regular human activity.* But there are a number of nesting Skylarks mainly in the field at the back of the Windmill. It is the only site we are aware of in the Coventry area that has Skylarks. If any development took place on the site they would be lost whether they had nested within the boundary or not.

**Bats** – there is a lot of bat activity in and around the site. A local resident has a bat detector and has been involved in bat Surveys for the Bat Conservation Society around Coventry. Mainly three types have recorded: Common pipistrelle, Daubenton's bat and Noctule. A proper bat survey will need to be undertaken as we expect their roosts could be close or even located on the site but this survey is recommended in the report

**Badger** – there is a large badger set on the edge of the site but this is recorded in the report

**Water Vole** – there is water vole activity along the Pickford Brook. Warwickshire Wildlife did the survey a few years ago. They also suggested the possible activity of mink but this was not confirmed.