
Part B – Please use a separate sheet for each representation

Name or Organisation: Oxalis Planning Ltd

1. To which part of the Local Plan Review does this representation relate?

Paragraph

 Policy

2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<table border="1"><input type="checkbox"/></table>	No	<table border="1"><input checked="" type="checkbox"/></table>
(2) Sound	Yes	<table border="1"><input type="checkbox"/></table>	No	<table border="1"><input checked="" type="checkbox"/></table>
(3) Complies with the Duty to co-operate	Yes	<table border="1"><input type="checkbox"/></table>	No	<table border="1"><input checked="" type="checkbox"/></table>

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Section 9 of the CCCLP sets out the Council's approach to the Green Belt and green environment.

The HELAA (2024) explains that as the site being promoted by Hallam Land (of which these representations relate, please see the written representations for further information) is located within the Green Belt, it is discounted for development. The evidence, produced on behalf of the CCCLP, does not, in our view, robustly review the Green Belt in full due to it being a 'Technical Update Study' to a full Green Belt Review in 2015, and therefore assuming that development is inappropriate because a site is located within the Green Belt, is unjustified.

Notably, the HL proposed site north of the A45 (Site Ref: 'BAB-016-24') falls within a large area of Green Belt referred to as 'Northwest Coventry' (Area 1), this area is extensive, and the evidence base does not review smaller or discrete parcels within it. The assessment therefore does not comprehensively review the potential for changes to parts of this large area of the current Green Belt.

The methodology used for the Update Study, stated at para 3.1 of the Green Belt Review, is that the review criteria needs to, "...enable evaluation as to how well an area of land meets the purposes of Green Belt as set out in the NPPF, and whether they can be developed in a sustainable manner if released." Taking the broadbrush approach that

has been applied to Area 1 in the Update Study, does not enable consideration of whether there are locations within the now larger area, which could be developed in a sustainable manner, nor how areas within it are influenced by changes that have taken place since the Joint Green Belt Study was prepared.

The Green Belt Technical Update Study (July 2024, Coventry City Council) increases the size of the Area 1 parcel being assessed since the 2015 review - within which the HL promoted site forms a small part. The Update Study amalgamates smaller parcels from the previous Joint Green Belt Study (2015, LUC) and extends the area that has been assessed for Area 1, from land to the west of Pickford Lane, beyond the Coventry boundary and up to the boundary of Solihull (see para 4.4 of the Update Study). This therefore contradicts a comment at para 3.3 of the Update Study which states the same parcels and broad locations have been reassessed as per the Joint Green Belt Study (2015, LUC). The Parcel Scoring Assessment found at Appendix 2 of the Update Study notes that amalgamating the parcels into Area 1 is to reflect that the area forms part of the wider Coventry Area Green Belt.

Area 1 has been assessed by re-utilising the scoring criteria from the Joint Green Belt Study 2015. This means the review is undertaken in a simplistic, broad way, that does not consider where in Area 1 the Green Belt functions and review criteria may vary, nor where there may be opportunity to release land from the Green Belt within that area.

Furthermore, Appendix 2 of the Update Study (in relation to Area 1) does not identify where the site visits took place within the area, although there are 4 photographs of countryside included. Much of the field notes text describes the area around Coundon. There is no mention of the emerging development / built form at Pickford Gate, nor of the recently completed A45 road junction and associated infrastructure and drainage, which are notable urbanising features and development that have not been considered in the assessment. The assessment notes there are extensive views across the area, but this doesn't reflect smaller parts of it that have a degree of enclosure and more limited views. This highlights the issue with taking such a broad approach of Area 1 in the review. There is recognition that there are existing views towards the city from sections of the A45, Oak Lane and other lanes which suggests some urbanising influence.

The Site (Ref: 'BAB-016-24') has a visual relationship with the countryside to the north and with the emerging development at Pickford Gate to the south of the A45; and the new A45 junction and infrastructure have an urbanising influence on the Site. Additionally, existing mature vegetation at Pinkett's Wood, around Oak Lane and north of Pickford, and the A45 / B4104 junction, provides a degree of existing visual containment which could be further enhanced and strengthened with additional landscaping as part of the development process. Therefore, there is potential for employment development within the Site which would incorporate an earthworks strategy to create the required building plateau which sensitively responds to the Site's topography, and proposed building heights that are appropriate to the context. Supported by the incorporation of a comprehensive approach to green infrastructure to break up built mass and soften the appearance of development, it is HL's view that the site could be removed from the Green Belt and developed without unduly compromising the wider role of the Green Belt on the western side of Coventry, and with suitable mitigation to minimise potential local impacts. The Council has, to date, not properly considered the potential opportunity of this site, and has simply relied on an assessment of much larger parcels within the Green Belt.

The 2023 NPPF (para 145) states that Green Belt boundaries can be altered where exceptional circumstances are fully evidenced and justified. It is our position that exceptional circumstances have been evidenced and justified through the work prepared

in support of the CCCLP, which provides an evidence base for the CCCLP Review. This includes the evidence of employment land need (identified by Icenii) in the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) published in November 2022, along with the supporting Coventry and Warwickshire HEDNA – WMSESS Alignment Paper published September 2024.

The 2023 NPPF requires strategic policy-making authorities to demonstrate that they have examined all other reasonable options for meeting identified needs for development before concluding exceptional circumstances exist (para 146). Having regard to the criteria set out in the 2023 NPPF para 146 it is clear that 'reasonable' alternative (non-Green Belt) options do not exist for meeting the identified employment land needs. The evidence demonstrates that even with maximum use of available brownfield and underutilised sites a very significant residual development needs remain.

The Coventry City Council Core Area is covered extensively by Green Belt. For land use needs to be met and for the City and surrounding settlements to grow and to be economically successful and sustainable, changes to the Green Belt have been made in the past. Within this context, and in accordance with the NPPF, there must be a more 'positive and proactive' approach to meeting identified needs. There is no justification to promote a Local Plan which does not meet employment needs in full without having undertaken a more comprehensive process of seeking to identify additional greenfield (including Green Belt) sites.

HL are of the view that the Site north of the A45 is less sensitive with regards to potential Green Belt harm than the wider area reviewed as part of the Green Belt Technical Update Study (2024) labelled 'Northwest Coventry' (Area 1). For reasons set out in Paragraph 4.8, the site can be sensitively developed so that it responds appropriately to its context and would therefore represents an opportunity to deliver additional employment land within CCC's boundaries.

Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025.

(Continue on a separate sheet /expand box if necessary)

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recognising that there is an unmet employment land need within Coventry, the Green Belt should be thoroughly reviewed in a comprehensive assessment to ascertain the suitability of sites for their release from the Green Belt in these exceptional circumstances, as opposed to the technical update study. The assessment should also narrow the assessment of land parcels rather than taking a broad-brush approach to thoroughly assess the Green Belt.

If it is deemed that exceptional circumstances exist to remove sites from the Green Belt to meet the employment land deficit, then the policies map should be updated appropriately, which in turn would amend Policy GB1.

Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

N/A

Please add any further comments relating to the SA report in the box below

N/A

(Continue on a separate sheet /expand box if necessary)

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As planning agents acting on behalf of the Landowners to promote the employment site located north of the A45, we consider it necessary to participate in hearing sessions to provide evidence in support of ensuring that Green Belt, and employment related policies are reviewed appropriately, in order to deliver the employment growth required in accordance with NPPF Section 6.

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.