

COVENTRY CITY COUNCIL LOCAL PLAN – REGULATION 19 CONSULTATION

February 2025

REPRESENTATIONS BY OXALIS
PLANNING ON BEHALF OF HALLAM LAND
(HL) AND THE TRUSTEES OF THE
EASTERN GREEN LAND POOL TRUST

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1. Introduction

- 1.1. These representations are submitted by Oxalis Planning on behalf of Hallam Land (HL) and the Trustees of the Eastern Green Land Pool Trust. HL are actively involved in the delivery of the mixed-use allocation known as 'Eastern Green' under Policy H2:2 of the current Coventry City Council (CCC) Local Plan, adopted December 2017. This site is now known as 'Pickford Gate' as first occupation of the site emerges. HL has a constructive and long-standing relationship with CCC established through the identification, allocation, and ongoing delivery of the Pickford Gate Site. Although this representation raises some concerns regarding its soundness, the emphasis is on suggested ways in which the emerging Plan may be improved.
- 1.2. These representations follow responses submitted to previous consultations held by Coventry City Council on the emerging Local Plan, including 'call for sites' processes. HL is proposing a site for allocation for employment uses adjacent to (to the north of) the existing Pickford Gate allocated mixed-use site. The site proposed for employment allocation is located north of the A45 and is referred to as Site Ref: 'BAB-016-24' within the 'Housing and Economic Land Availability Assessment' published November 2024, which forms part of the evidence base for the Local Plan.
- 1.3. Representations were made to promote this site during Summer 2023 in response to the Regulation 18 consultation and associated 'Call for Sites' exercise, as well as during the Summer of 2024 in response to a further 'Call for Sites' exercise specifically for employment land.
- 1.4. The proposed allocation of this site is a direct response to the Council's identification of a need for employment land through the evidence base which informs the draft Local Plan. The CCC Local Plan Regulation 19 version (December 2024) ('CCCLP') sets out that the Council will not allocate new employment sites to meet the identified shortfall of 45 ha (as identified in paragraph 3.14 of the CCCLP). In summary, HL object to the CCCLP as it is unsound on the basis that it has not been positively prepared to meet the employment development needs of the area.
- 1.5. Notwithstanding the employment land requirement set out within the regulation 19 Local Plan, evidence (by Savills) suggests the shortfall is even greater than that assumed by the Council's assessment. To address the shortfall in employment land supply versus identified need, CCC should identify suitable additional land to be allocated for development, and this process should include a comprehensive review of Green Belt boundaries.
- 1.6. Our arguments presented within these representations set out why the approach to employment development is unsound, whilst presenting an opportunity to deliver a site to go some way to meeting that deficit.
- 1.7. The land proposed is in the Green Belt and is closely associated with the wider land holding which now accommodates the Eastern Green mixed-use allocation and

development site south of the A45. The Pickford Gate site was removed from the Green Belt in the last local plan and allocated for development. The site is now under construction, and a new grade-separated junction has been delivered (and now adopted by CCC Highways) to serve the Pickford Gate site. This junction provides direct access from the A45 to the land now proposed for allocation to the north and forms part of the opportunity to develop a new employment site which would contribute towards meeting Coventry's employment needs.

1.8. In these representations we will therefore:

- Review the 'soundness' of CCCLP policies concerning the economy and employment;
- ii) Review the appropriateness of the levels of growth proposed and how it relates to national policy;
- iii) explain how it is not appropriate to simply hope that neighbouring authorities will pick up the unmet need;
- iv) Review the soundness of the approach to the Green Belt review in relation to the identified employment land shortfall and assess, at a high-level, why the land north of the A45 should be considered individually;
- v) refer to the work undertaken by Savills, which adopts a market led approach to assessing employment needs, to raise concerns about the approach to assessing need;
- vi) conclude that the needs identified by Iceni are the absolute minimum that should be planned for and emphasise the need for flexibility to ensure these minimum needs are met in full;
- vii) put forward land north of the A45 as a suitable, high-quality site that can contribute to meeting the employment land needs of the area;
- viii) make comments on proposed policies in association with the Eastern
 Green allocated site

2. The Vision, Overall Levels of Growth, and the Duty to Co-operate

The Vision

- 2.1. Section 2 of the Regulation 19 CCCLP sets out the Council's aims with regards to the economy, growth, housing, and climate change. In respect of the economy, paragraph 2.4 sets out the following economic objective:
 - an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- 2.2. The above objective therefore sets out the Council's aspirations to delivering a prosperous economy and explicitly set out that this will be achieved "by ensuring that sufficient land of the right types is available in the right places...".

Overall Levels of Growth, and the Duty to Co-operate

- 2.3. In order to meet the objectives set out in 'The Vision' section, the Plan sets out its approach to Growth and the Duty to Co-operate under section 3 of the CCCLP.
- 2.4. The CCCLP refers to an assessment of employment land need and supply having been undertaken, and paragraph 3.14 sets out that the Council are unable to accommodate all of its local employment land need resulting in a shortfall of 45ha.
- 2.5. Paragraph 3.15 sets out how the Council intends on meeting this need by explaining:
 - "Ongoing work is continuing with partners under the Duty to Co-operate to work collaboratively and constructively to address strategic need as, being a constrained area, no further opportunities are available in Coventry."
- 2.6. Draft Policy DS1 part 3 sets out that the employment land need will not be accommodated within CCC's boundary and that CCC will continue to work through the Duty to Co-operate to make appropriate provision elsewhere. However, at this stage, we are unaware that any public draft Statement of Common ground (SoCG) or Memorandum of Understanding (MoU) has been published to confirm that the City's unmet local employment land need is guaranteed to be met by neighbouring authorities. If such a document is being prepared and exists in draft, it should be made available.
- 2.7. In our view, this approach is unsound as the identified employment land requirements are not proposed to be met or planned for either by allocating new sites, or by a confirmed MoU or SoCG with neighbouring authorities.

- 2.8. Part 4 of draft Policy DS1 sets out that the CCCLP will be reviewed prior to the end of the plan period in the event of unmet employment needs not being deliverable elsewhere. While an early review is not problematic in principle, the approach to reviewing the plan if unmet employment needs are not delivered is also considered unsound as the Plan does not set out a precise timescale for that review. Given the lack of clarity about exactly how the City's unmet needs will be met, more specificity is required about the strategy should the hope attached to the Duty to Co-operate with other local authorities fail. Reliance on part 4 of Policy DS1 clearly indicates an awareness that that the proposed approach to delivering unmet need may not work.
- 2.9. Furthermore, the lack of precise timescales for such a review followed by undertaking of a review in itself will inevitably significantly delay the delivery of employment sites, further constraining the supply of employment land. As a result, the objectives set out in the CCCLP would not be achievable as constraining supply would have a negative impact on economic growth, and supply of jobs.
- 2.10. In conjunction with Section 2 above which refers to 'The Vision', the CCCLP does not currently achieve the objective of "ensuring that sufficient land of the right types is available in the right places...", and the general approach to the economy through detailed policy is not sufficiently positive or proactive, contradicting 'The Vision' in the CCCLP.
- 2.11. Furthermore, the identified shortfall relates to a 'local employment need' (whereby non-strategic sites are required) to provide local employment opportunities and business development. If this need were to be delivered in neighbouring authorities, it would less directly benefit the local Coventry population and would therefore contradict the aspirations set out in 'The Vision' section of the CCCLP which sets out a priority of 'Increasing the economic prosperity of the city and region'.
- 2.12. The proposed approach clearly falls someway short of the requirements of national planning policy. It is understood that the CCCLP is being prepared (and examined) under the 'transitional arrangements' set out in the updated 2024 NPPF, meaning the appropriate national policy is the National Planning Policy Framework (referred to here as 'the 2023 NPPF') of December 2023.
- 2.13. The 2023 NPPF is clear about the importance of the planning system in supporting the economy and meeting the specific requirements and needs of key sectors of the economy, including through providing suitable employment land. Paragraph 85 states that:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.'

and

'Significant weight should be placed on the need to support economic growth and productivity taking into account local business needs and wider opportunities for development.'

- 2.14. The 2023 NPPF (Paragraph 86) is clear about the importance of assessing economic needs and then putting in place a plan to meet those needs. This forms one part of the expectations of planning policies which are required, inter alia, to (our emphasis added):
 - a. set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;
 - b. set criteria, or identify sites, for local and inward investment.....to meet anticipated needs over the plan period;
 - d. be **flexible enough to accommodate needs not anticipated** in the plan....and enable a rapid response to changes in economic circumstances.
- 2.15. The evidence base prepared by CCC and their neighbouring authorities acknowledges that the CCCLP fails to meet the needs identified with a shortfall of local employment land of 45 ha. The CCCLP cannot be considered sound when it clearly fails to meet the requirements of para 86 of the NPPF, where no clear strategy is proposed to positively and proactively encourage sustainable economic growth, and identified needs will not be met.
- 2.16. As referred to above, the requirements of the 2023 NPPF includes not only planning to meet anticipated needs, but also to 'be flexible enough to accommodate needs not anticipated'. It is unclear how the current proposed approach of the CCCLP is attempting to accord with the NPPF given it is failing even to meet currently identified need and so provides no flexibility for additional needs.
- 2.17. The planning principles set out by the Government are relatively simple. They require Local Authorities to undertake a full and thorough assessment of development needs and to then set out a strategy including through allocation of sites, to meet those needs. While some attempt has been made in preparing the CCCLP to do the first part of this process (evidence of need), it quite clearly fails on the fundamental second part (identifying sites). Notwithstanding the issue that the shortfall relates to 'local' sites required (as opposed to more strategic sites), the lack of any confirmation of an emerging acceptance of the principle of meeting unmet needs in other neighbouring authorities further underlines HL's concerns and objections.
- 2.18. The CCCLP falls some way short of meeting the requirements of the NPPF with regard to planning for local (and other) employment need and is therefore unsound.
- 2.19. Section 3 of these representations discuss the employment evidence base in further detail.

3. Jobs and Economy

- 3.1. Section 5 of the CCCLP sets out the Council's approach to the overall economy and employment strategy. It details that the Council will work positively and proactively with the business community in the city, inward investors, the City's two Universities, key public sector employers, partners, and neighbouring local authorities to support sustainable economic growth and job creation.
- 3.2. Part 1 (C) of the policy explains that the Council will (our emphasis):

"Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the ambitious growth agenda for the sub-region"

- 3.3. This policy cannot be considered achievable on the basis that employment land requirements are not proposed to be met and positively planned for, and an insufficient supply of new employment sites are provided to meet the projected need over the plan period.
- 3.4. In addition, draft policy JE2 is considered unsound in accordance with Paragraph 86 of the NPPF (as set out in the previous section), as it does not provide employment land to meet the identified employment needs.

Employment Evidence Base

- 3.5. As set out in section 5 of the CCLP, employment policies are based on the following documents, that form part of the evidence base:
 - Housing and Economic Development Needs Assessment (HEDNA) (2022)
 - Employment Land Review (ELR) (2024) and ELR Office Market Addendum (2024)
 - Housing and Employment Land Availability Assessment (HELAA) (2024)
 - West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024)
 - Coventry City Council Economic Development Strategy 2022-2027
 - Local Plan Review Employment Background Paper (2024)
- 3.6. The Iceni 'Housing and Economic Development Needs Assessment 2022' made a key conclusion that there is a need to commission a further study to specifically consider the needs for strategic logistics.
- 3.7. The subsequent 'West Midlands Strategic Employment Sites Study 2023/24' published August 2024, provides advice on site criteria, and although this is in relation to strategic

sites, it identifies the A45 corridor (Area 7) as having high demand and resulting take-up, and 'rents achieved are some of the highest in the Midlands market'. Further, it explains that 'Coventry has relatively high levels of unemployment', which only further highlights the importance of delivering adequate employment land supply.

- 3.8. An up to date, proactive and forward-looking evidence base is essential to inform the new local plan. Retrospective, or backward-looking past trend-based evidence will only serve to perpetuate historic missed opportunities to fully plan for the needs of the City's economy. While the HEDNA has considered a number of scenarios and sources of evidence of need and demand, it is important to note that the analysis undertaken is essentially trend based. Given the historic under-supply of large-scale sites across the wider region and a relative lack of allocations of such sites through past Local Plans in the West Midlands (and elsewhere), any trend-based projection of need and demand will inevitably be an under-estimation.
- 3.9. In addition to the above, supply needs to be considered to meet the replacement supply demand of existing businesses within Coventry who seek new premises better suited to their evolving requirements, and to allow modern modes of operation. This need is recognised in the evidence base, and the availability of sufficient land is critical if this natural 'churn' in the market is able to take place. New replacement employment premises redeveloped existing sites or refurbished buildings can make a notable contribution to improving the quality of existing supply by delivering modern units with, for example, greater energy efficiency or renewable energy opportunities which helps meet the ESG or sustainability aims of many occupiers which are not currently or easily met in older, existing employment buildings.
- 3.10. Whilst the CCCLP acknowledges the unmet need in relation to non-strategic employment need, it goes little way to discussing the requirements of employment land for strategic sites of 25ha or more, or 9,000sqm+, a requirement set out in the WMSESS 2024.
- 3.11. The WMSESS 2024 draws conclusions based on areas of opportunity, and 'Area 7' falls within the administrative boundaries of Rugby Borough and Coventry City. Responsibility therefore falls on these authorities to allocate sites to meet this identified unmet need of 9 84ha as set out in the 2024 Alignment Paper. Work done by Savills for HL challenges this need figure, suggesting the need for strategic sites is higher.
- 3.12. The unmet need for strategic sites is in addition to the strategic site allocation set out in the CCCLP JE2:4 for 25ha, which is already identified in the WMSESS 2024 as a pipeline supply site and therefore does not meet that shortfall set out above.
- 3.13. There is no clear evidence published between CCC and Rugby Borough that sets out how this unmet (strategic or non-strategic) need will be delivered between the authorities, and CCC should therefore make information publicly available as to how the Duty to Cooperate Partners are working together to meet this need.

3.14. In general, the recognised unmet employment land need for non-strategic sites and failure of CCC to fully assess and set out the approach to meeting strategic employment land requirements, demonstrates a negative approach to employment development. This in turn undermines CCC's approach to the local economy, and contradicts the approach set out in 'The Vision' section of building a strong, responsive, and competitive economy.

Savills Assessment of Employment Need

- 3.15. Evidence which forms part of these representations highlights that the overall need for employment land in Coventry City is greater than that assumed by the CCC evidence base. Therefore, in reality the shortfall between requirement and proposed new land supply is also more significant than the 45ha, in both quantitative and qualitative terms, than that identified by the CCCLP and its supporting evidence base.
- 3.16. Savills have prepared a report (Industrial and Logistics (I&L) Needs Assessment February 2025) which reviews and assesses the robustness of the employment evidence base. It draws conclusions on employment land requirements based on Savills' own assessment of needs that considers historic under delivery of sites, as well as forecasted future growth. Please find the report enclosed.
- 3.17. The Savills report critiques the evidence base for employment land needs in support of the Local Plan comprising the 2022 HEDNA, 2024 WMSESSS, and West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024). It assesses that the identified employment land requirements are formed by an analysis of trend-based data, which does not consider market indicators¹.
- 3.18. Recent market trends indicate through the high absorption rates, low stock availability, and increased rental values that the market has historically (and currently) been constrained by supply, therefore resulting in inhibited take-up. The trend-based assessment in the Council's evidence base, therefore, does not consider these market conditions and in turn underestimates the actual employment land need requirements. This does not accord with NPPF Paragraph 32 (Dec 2023) which specifically requires policies to "take into account relevant market signals". See footnote 1.
- 3.19. The Savills report uses their own assessment methodology which considers market signals in accordance with NPPF paragraph 32, which is becoming a well-recognised method of accurately identifying employment land requirements. In summary, this assessment concludes that the employment land requirements across the FEMA are underestimated, as is Coventry's share of the non-strategic employment need across the FEMA. Accepting the Council's identified supply of non-strategic sites at 67ha (some sites of which are identified to be constrained by Savills²), Savills conclude that the

¹ Industrial and Logistics (I&L) Needs Assessment, Savills, February 2025, Page 25

² Industrial and Logistics (I&L) Needs Assessment, Savills, February 2025, Paragraph 1.36, and Section 6

unmet need is 72 - 86ha, which is significantly greater than the 45ha recognised within the CCCLP.

- 3.20. We therefore consider the 45ha shortfall identified in the CCCLP as the bare minimum that should be planned for, but we suggest that employment land requirements are significantly greater than that, as identified by Savills. A more positive response to the market signals as proposed by Savills' evidence, would better accord with NPPF Paragraph 32.
- 3.21. Furthermore, the historic undersupply of employment sites identified by Savills results in occupiers relocating away from Coventry City in order to find suitable premises. The result of which contradicts the defined vision for the CCCLP which identifies the City as an area for strong economic growth³. Additionally, the relocation of businesses outside of Coventry City forces employees to travel further (often by private vehicles) to the premises, as well as increasing distances to transport goods, which in turn impacts on climate change objectives.
- 3.22. The Savills assessment summarises that the Site North of the A45 is in an ideal location in relation to an employment pool⁴, the conurbation of Coventry, and distances to the strategic road network. The Site could offer a range of units at a small to medium scale (sub-9,000sqm) to strongly support Coventry's economic objectives and help to retain local businesses within the City. This site would contribute towards meeting the 72 86ha employment land shortfall identified by Savills and would therefore be a critical site for the City, as summarised by Savills.

HELAA Land North of the A45 Submission

- 3.23. The November 2024 Housing and Economic Land availability Assessment (HELAA), which seeks to identify suitable land for development, does not thoroughly review the employment land sites proposed to the Council.
- 3.24. The Employment Land Supply section within the report on page 26 of the Housing and Employment Land Availability Assessment (HELAA) (2024) is not robust, and in summary, states that 4 submissions were received for employment sites, 3 of which were existing sites, and one that was 'discounted for various reasons including being on Green Belt land'.
- 3.25. It is assumed that the site in which this statement refers to is the site promoted by HL (land north of the A45 Site Ref: 'BAB-016-24') as this was an employment land submission not on an existing employment site and is located in the Green Belt. Page 180 of the HELAA reviews this site and simply concludes that the 'development would likely have major negative effects for landscape and Green Belt objectives'. This conclusion is based on the July 2024 Green Belt Technical Update Study which

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³ Industrial and Logistics (I&L) Needs Assessment, Savills, February 2025, Paragraph 5.3.4

⁴ Industrial and Logistics (I&L) Needs Assessment, Savills, February 2025, Section 2

- evaluates a large area of the Green Belt west of Coventry and does not specifically evaluate the context or characteristics of the Site. Simply dismissing the site because of 'Green Belt' does not alone properly or fully explain why this site has been discounted.
- 3.26. Green Belt issues are discussed further in section 4 of these representations. However, Green Belt boundaries can be altered where exceptional circumstances are fully evidenced and justified, as set out in the NPPF. It is HL's view that the significant shortfall of employment land provides this exceptional circumstances needed to review the boundaries in a robust way.
- 3.27. Notwithstanding this, the assumptions made regarding the site area in the HELAA are incorrect. It details that the site area is 11.8ha rather than 20ha (gross) as submitted as part of the Call for Site exercise. The developable area is also incorrect as it is assumed based on a plot ratio against the 11.8ha, rather than 11.8ha being the developable area.

4. Green Belt

- 4.1. Section 9 of the CCLP sets out the Council's approach to the Green Belt and green environment.
- 4.2. The HELAA explains that as the site 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.
- 4.3. 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.
- 4.4. The methodology used for the Update Study, states at para 3.1 of the Green Belt Review 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.
- 4.5. 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.

- 4.6. 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.
- 4.7. 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.
- 4.8. 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.
- 4.9. 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 Iceni) 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. Section 3 of these representations sets out in further detail the strength of the case in terms of both the scale and urgency of need is then very strongly reinforced by the work Savills have undertaken on behalf of HL.

- 4.10. 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.
- 4.11. 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.
- 4.12. 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.

5. The Availability and Suitability of Additional Sites Land North of the A45

- 5.1. Oxalis Planning on behalf of HL have put forward the site north of the A45 as a suitable site for employment development. The site is located adjacent to the A45 and has been 'unlocked' through the delivery of the Eastern Green allocation, and specifically the associated grade-separated junction over the A45. It is named 'Land North of A45 and West of Brickhill Lane' in the November 2024 HELAA (Background Paper), site reference 'BAB-016-24'.
- 5.2. A Document setting out the master planning approach to, and explaining the merits of, the site is included within this submission at **Appendix 1**. This document is an early

iteration of a vision document which sets out how development could come forward and will be updated as development of the site is considered further. Previous submissions have been made to CCC, and this document includes updates to the details of the scheme proposed. These updates take account of further assessment work as well as providing clarification on certain matters in response to the Authorities' assessment of the site as set out in the Background Paper.

- 5.3. The Site is located within the A45 opportunity 'Area 7' defined by Iceni in the WMSESS.
- 5.4. As discussed further in section 3, the HELAA identifies two reasons why the site is not considered deliverable: Green Belt and isolation from the City's built-up area. It infers that exceptional circumstances do not exist to consider allocating the site. HL strongly disagree with these conclusions, given the overarching suitability of the site and the compelling need position (quantitative and qualitative) set out in these representations.

Summary of the Site 'Land North of A45'

5.5. The following is a summary of the key components and merits of the scheme.

Site Area: 20ha in total with a developable area of around 11.8ha.

Site Context: The site is contained by the A45 to the south, Pinkett's Wood to the west, Oak Ln and Brick Hill Lane to the north, and Brick Hill Lane to the east. This context together with the site's landscape and topography provide the realistic potential to contain the scheme through a combination of the existing landscape and proposed new planting.

Landscape Framework: The proposed scheme would be set within an extensive landscape framework, with development plots placed in cut to create the required plateau for buildings which would be set within landscaped mounds around the entire site perimeter, substantially screening the development from outside view.

Biodiversity and Nature Recovery: The scheme is predicated on a positive response to the landscape and the aspiration to deliver significant benefits in terms of biodiversity.

Accessibility to Labour: The location of the scheme provides the opportunity for sustainable travel connections to and from the new Pickford Gate development, and Coventry beyond, and its extensive labour pool. This includes excellent bus links, potential for integration with the future 'Very Light Rail' aspirations, and strategic cycle and pedestrian connections.

Access to the Strategic Highway Network: The site is exceptionally well located relative to the strategic highway network with immediate access to the A45 which in turn provides access to the M69, M6, M42, and M1 further afield.

Economic Benefits: The scheme will deliver flexible plots for various business uses, essential for a thriving economy.

6. 'Eastern Green' SUE - Related Policies

- 6.1. As Planning Agents acting on behalf of HL and the Trustees of the Eastern Green Land Pool Trust, we have an ongoing interest in the Eastern Green mixed-use allocation referred to in these representations, now known as 'Pickford Gate'.
- 6.2. Policy DS4 Part D in the CCCLP concerns specific principles of development for the Eastern Green allocation. Criterion 'X' of that policy requires the development to 'Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known'.
- 6.3. In conjunction with CCC, it was envisaged at the time of the existing adopted Local Plan, and when the Outline planning permission was granted, that CCC aspired for a rapid transit route to enter and exit the Pickford Gate site via the eastern boundary of the site (via Juniper Park). Since development of the site has progressed, including approvals of key infrastructure corridors within the site, CCC have made it clear that their application to link the 'Public Transport Corridor' through Juniper Park has since fallen away. This was the Council's envisaged route for the rapid transit corridor, and the eastern boundary of the site is considered the only feasible opportunity for the site to integrate a major new dedicated public transport network (as allowed for via the planning permission). Therefore, if the link to the site boundary via Juniper Park will no longer be pursued the Pickford Gate site can no longer provide a rapid transit route. Delivery of the rapid transit connection was always to be delivered in conjunction with the Council who controls Juniper Park and who would deliver any future rapid transit system up to the site boundary. In the absence of progress with the envisaged link to join the approved corridor within the Pickford Gate site (and planning permission), it is unclear how the proposed retained criterion 'X' can be delivered.
- 6.4. The wording implies there may be other future routes or links into the site proposed, but that ignores progress made with reserved matters having been submitted and approved in some phases of the site, and other applications with CCC for determination. Third party developers have now bought or are in the process of buying other phases or parcels, and in order to deliver the housing allocated to the site, these partners require clarity and confidence regarding the policy context and expectations of the Council and Local Plan. Given the planning status of the Pickford Gate site, a loosely worded and open-ended policy criterion such as that proposed currently is entirely inappropriate and unworkable.
- 6.5. We therefore object to the soundness of Policy DS4 Part D, on the basis that criterion 'X' can no longer be delivered. This requirement of the policy for the Pickford Gate site should be removed.

7. Conclusions

- 7.1. The CCCLP consultation asks for views relating to matters of soundness, specifically if it has been positively prepared, justified, is effective, and consistent with national policy.
- 7.2. Following from the points made in these representations, this section sets out the key reasons why we do not consider the plan to meet the soundness requirements and tests:

Positively Prepared

7.3. The Vision of the CCCLP makes positive statements concerning a strong and resilient economy where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created. These statements are then not supported by proposed policies which do not identify the provision of sufficient employment land to meet identified needs, nor any flexibility to meet other needs over the plan period. The strategy is demonstrably a negative approach to employment and to the local economy. There is no evidence of any agreement by Duty to Cooperate Partners that will help to deliver this need.

Justified

7.4. The plan does not set an appropriate strategy and has not properly considered all reasonable alternatives. The Council's own evidence suggests a 45 ha shortfall in employment land – evidence by Savills submitted by HL suggests the real figure is likely to be almost twice that (72-86ha).

Effective

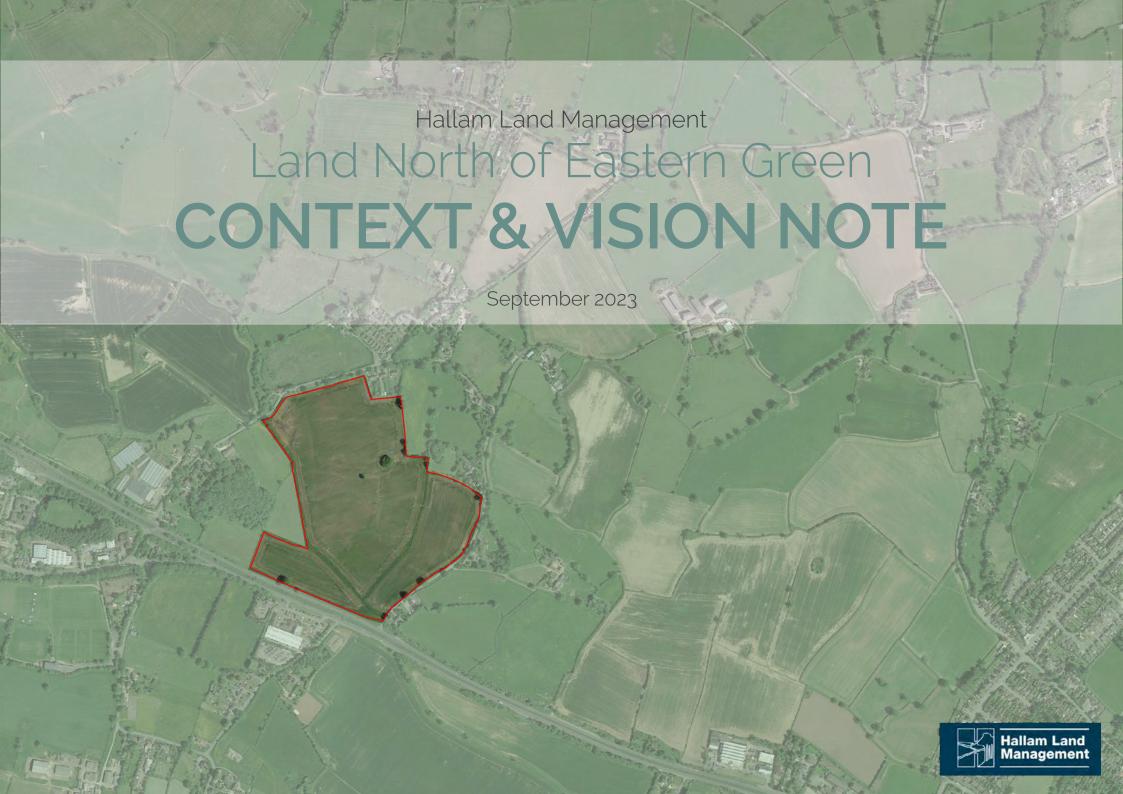
7.5. There are references to the shortfall in employment land being met through cross-boundary working, but there is no evidence that this is deliverable. The Plan does not plan effectively to meet development requirements over the plan period.

National Policy

- 7.6. As discussed in the previous section, the CCCLP falls someway short of the requirements of the NPPF. As examples, the significant weight given to the need to support economic growth and productivity, and the need for a positive and proactive strategy found in the NPPF are absent from the Plan. The NPPF states that Green Belt boundaries can be altered where exceptional circumstances are fully evidenced and justified, but despite a significant shortfall in employment land supply, the Council has not undertaken a full review of alternative options, including land in the Green Belt.
- 7.7. In summary, HL consider the CCCLP to be unsound, fundamentally due to not planning to meet the identified employment needs (which we say are more significant than the requirement identified by the Council) as discussed in detail within this response.

- 7.8. We believe the significant shortfall in employment land supply represents the exceptional circumstance that requires a review of the Green Belt. Having regard to the evidence set out, the dismissal of the site 'North of the A45' from the CCCLP should be revisited as part of that more robust and finer-grained assessment.
- 7.9. The site is in an appropriate location for growth as identified by CCC's evidence base (opportunity Area 7 of the WMSESS, 2024). HL's view is that development on this site can be undertaken in a positive and beneficial way where environmental effects can be managed, and the benefits maximised. Importantly it would help to address the current qualitative as well as quantitative deficiencies in the supply of employment sites.

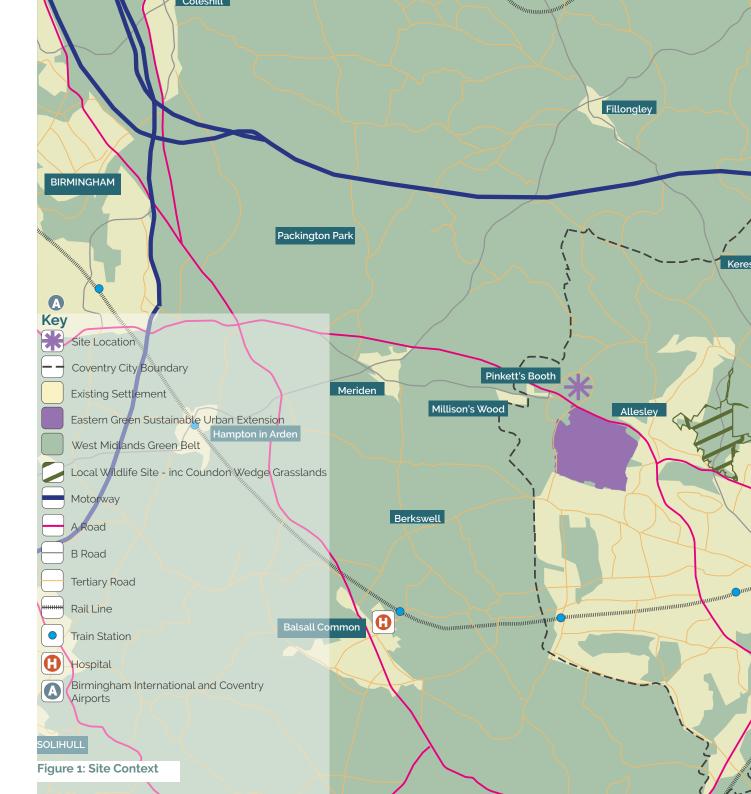
Appendix 1 – North A45 Site Vision Document



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Prepared on behalf of Hallam Land Management Ltd (Hallam), this document sets out the broad vision and approach for potential future employment development on land north of the consented Eastern Green Sustainable Urban Extension (SUE) and outlines initial baseline material and considerations.



Arbury Park **BEDWORT** COVENTRY

The neighbouring Eastern Green SUE site will deliver 15ha of employment land suitable for B1, B2 and B8 uses, but an additional supply of employment sites will be required through the new Local Plan to meet the development needs of the City over the longer-term, and enable Coventry City to meet its aspirations and objectives to deliver sustainable economic growth. This will include new strategic sites to meet a proportion of the 'strategic B8 floorspace' which has historically not been planned for in a coherent or comprehensive way, creating a significant under-supply over many years. Average building sizes are growing in the distribution sector and many local and national occupiers require sites capable of accommodating larger (9000 sg.m. and above) buildings to support this key sector of the local and national economy. While this need is to be distributed across a number of LPAs, given Coventry's importance as a key City in the West Midlands, if it is to deliver sustainable development and help reduce the need to travel, land must be found within the City's administrative area. To identify the most sustainable locations, it is anticipated this will require a comprehensive, fresh review of the Green Belt boundaries.

Hallam is promoting this site north of the A45 as a new employment allocation through the the emerging Local Plan for Coventry City. This site is circa 20ha and is well located with excellent connectivity to the strategic transport network:

- junction 4 M6 is approximately 15-minutes away via the A452
- junction 6 M42 is approximately 10-minute drive away
- HS2 Station at Solihull is approximately 20-minute drive away

The site is located only circa 1.3km from the western edge of the existing built-up area of Coventry City, with the City expanding westwards as the residential led Eastern Green urban extension is built out, creating a new urban neighbourhood and residential population in the City.

Development of this site would comprise circa 11.8ha and represent a continuation of the principle of employment development and economic activity on the strategic A45 corridor, accessed via the new junction which has the capacity to accommodate additional traffic, while also providing new foot and cycle links over the A45 and to a new, improved network of routes being provided within the Eastern Green urban extension. These links include connectivity into the City, with new public transport (bus, and in time, planned 'rapid transit' links) to and from the City Centre forming part of the consented Eastern Green urban extension scheme. As the Urban Extension site is built-out the size of the potential workforce within easy reach of this site by range of sustainable transport modes will increase significantly.

This location offers an opportunity to maximise the benefit of the investment in the A45 corridor and complement the growth already consented at Eastern Green to provide a new focus of employment and economic activity which directly supports and underpins the City's continued economic role in the wider region.

2 BASELINE CONSIDERATIONS



Figure 2: Landscape Character & Visual Appraisal

KEY - LANDSCAPE CHARACTER

Site Boundary

Warwickshire Landscape Guidelines (1993)



Urban Land

Coventry Urban Fringe Landscape Assessment and Guidance (March 2007)

Land Cover Parcel (LCP) Boundary with Reference

KEY - VISUAL APPRAISAL



Open view into the site



Photoviewpoint Location



Public Right of Way (PRoW) M249

Landscape Character & Visual Amenity

The site is predominantly arable farmland located within National Character Area (NCA) 97: *Arden*, county landscape character area *Ancient Arden*, and local Land Cover Parcel *ARo1m*. It lies within the Coventry Green Belt but is not covered by any landscape quality designations and none are within the vicinity. Construction work for the new HIF road access into Eastern Green dominates the southern part of the site.

Landform gently slopes across the site, generally rising northeastwards with lower lying land along the Pickford Brook corridor bordering much of the site's western edge. Pinkett's Wood, a designated Ancient Woodland, is located just to the west of the site.

Overall, while the site itself is relatively open in character, the site is well contained within the wider landscape and relates well to the consented Eastern Green site immediately south of the A45 which includes employment development in the northern section of the scheme. The site is not particularly sensitive in landscape and visual terms with a limited visual envelope that does not extend beyond Oak Lane to the north and west, Brick Hill Lane to the east and the A45 to the south. Only a small number of potential visual receptors are identified: residents of Oak Lane and Brick Hill Lane adjacent to the northern and eastern site perimeters, users of the public right of way (PRoW, Ref. M269) which crosses the site and users of Oak Lane, Brick Hill Lane and the A45 when passing the site.

There are opportunities for new green infrastructure to be created which build upon and strengthen retained site features, such as the perimeter vegetation and internal mature trees. The existing public right of way (Ref. M269) will be integrated and the provision of new recreational routes and green spaces, together with wildlife habitats, will be explored through an iterative landscape-led design process.

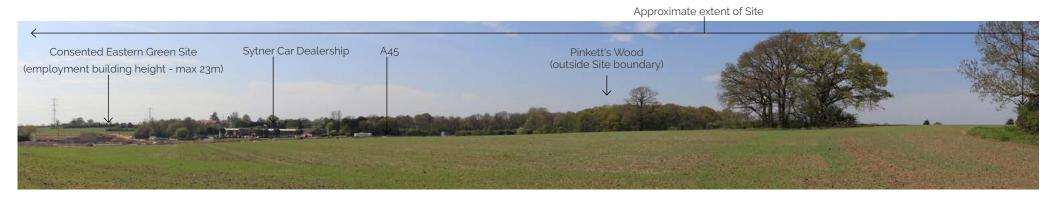
BASELINE CONSIDERATIONS 2



Photoviewpoint 1 - View south from northern site boundary adjacent to Oak Lane



Photoviewpoint 2 - View south from northern site boundary next to No1 Oak Lane residential property



Photoviewpoint 3 - View south west from Public Right of Way (PRoW) M249

2 BASELINE CONSIDERATIONS

Ecology & Biodiversity Net Gain (BNG)

No statutory or non-statutory designated sites of nature conservation value occur within the site boundary. No Internationally recognised statutory sites occur within 10km and no Nationally recognised statutory sites occur within 2km of the site.

The site comprises intensive cereal crop production (c.14.4ha) surrounded 3-10m wide other neutral grassland arable field margins and native hedgerows. A pond is located within the site and there are a number of other offsite ponds within 500m of the site. A number of semi-mature to mature broadleaved trees are associated with the hedgerows and surround the pond. A flowing watercourse (Pickford Brook) runs along the western boundary, with a ditch along the north-eastern hedgerows and dissecting between the arable field compartments. The southern portion of the site was categorised as bare ground arising from disturbance and active construction of the HIF work.

Overall, with the exception of the perimeter hedgerow, grassland, Pickford Brook corridor, pond and mature trees habitat, which provide greater connectivity and species diversity, the onsite habitats predominantly represent a relatively low biodiversity value. The site currently provides potential habitat for fauna including farmland birds, great crested newt, badgers and bats and further species specific surveys will be carried out as the project progresses.

There are opportunities to protect, enhance and expand the existing habitat network through appropriate and well designed connected habitat creation, including linear structural native species planting and multifunctional wetland features and habitats. The project will meet biodiversity gain targets that will be applicable once the Environment Bill is mandated.



Figure 3: Ecology Baseline Habitats

KEY - ECOLOGY BASELINE HABITATS

Site Boundary

New Highways Infrastructure (approved and under construction)

Baseline Habitats

Bramble Scrub

Cereal Crops

Other Neutral Grassland

Ponds (non-priority habitat)

Bare Ground

Baseline Hedgerows

Native Hedgerow

Native Hedgerow with Trees

Species-rich Native Hedgerow

Species-rich Native Hedgerow with Trees

Species-rich native hedgerow with trees associated with Bank or Ditch

Baseline Trees

Existing Large Rural Tree

Existing Medium Rural Tree



Figure 4: Ecology Proposed Habitats

KEY - ECOLOGY PROPOSED HABITATS

Site Boundary

New Highways Infrastructure (approved and under construction)

Habitats

Developed Land

Mixed Scrub

Other Neutral Grassland

Ponds (non-priority habitat)

Sustainable Drainage System

Employment Area (90% developed land; sealed surface, 10% introduced shrub planting

Hedgerows

Native Hedgerow

Native Hedgerow with Trees

___ Species-rich Native Hedgerow

Species-rich Native Hedgerow with Trees

Species-rich native hedgerow with trees associated with Bank or Ditch

Baseline Trees

Existing Large Rural Tree

Existing Medium Rural Tree

Archaeology

High level assessment work has been undertaken which suggests that the presence of features and assets are limited as briefly outlined below.

Remnants of Medieval ridge and furrow within the north-west of the land parcel are recorded on the HER. This survives as below ground features which have been detected through aerial photography and lidar survey data. No other archaeology has been identified at present within the land parcel. It should be noted that remnants of ridge and furrow are common across some pockets of the consented Eastern Green site to the south. An Archaeological DBA will be prepared and agreed fieldwork carried out which is likely to involve a trenching sample strategy (similar to the Eastern Green site).

Only two designated heritage assets - Grade II Listed White House Farmhouse, Grade II Listed Pickford Farmhouse and Grade II Listed Farm Buildings (c.3m south of Pickford Farmhouse) - will need to be considered, all of which lie c.200m to the north-east and east of the land parcel. Due to the close proximity of these buildings to the land parcel, a separate Heritage Statement assessing any potential impacts from the proposals upon their settings and significance will be prepared. The emerging Development Framework acknowledges the Listed Farmhouses and Buildings and will continue to sympathetically consider, accommodate and appropriately integrate these and other identified features and assets as the proposals are further developed.

OPPORTUNITIES & CONSTRAINTS

Current known opportunities and constraints are shown here and have helped shape the emerging Development Framework opposite.

Site Boundary 20ha

Existing Contours

Existing Vegetation

Existing PRoW

(as indicated)

Consented Eastern Green Development

Surface Flooding (Environmental Agency)

Existing Ancient Woodland with minimum 15m buffer



Figure 5: Opportunities & Constraints

DEVELOPMENT FRAMEWORK & EMPLOYMENT CONTEXT 4

The emerging Development Framework is landscape-led and will follow an iterative design process as the scheme develops.



Figure 6: Development Framework

DEVELOPMENT FRAMEWORK & EMPLOYMENT CONTEXT

The plan below illustrates the context of the emerging proposal in relation to the consented Eastern Green development south of the A45.





Land North of Eastern Green CONTEXT & VISION NOTE