

COVENTRY PLAN : HOUSING
REGULATION 19 CONSULTATION

3RD MARCH 2025

These representations and objections are made by me on behalf of Coventry residents, my parents, James and Sylvia McNaught of [REDACTED] and my brother Neil McNaught of [REDACTED]

The representations/ objections made by Mark Sullivan of CPRE are agreed and rather than setting out and duplicating the specific policies referred to by him, his comments are adopted in full and should be treated as complementing this submission.

Please note that I am not using the forms simply for ease of access to these submissions in future and so that they can be copied to those on whose behalf they are made and other interested parties.

Under separate cover I will be forwarding the report of Gerald Kells.

COVENTRY LOCAL PLAN REMOVAL OF LAND FROM THE GREEN BELT

The central point to make is that very substantial areas of green belt in Coventry were removed from the green belt on the basis of housing figures and projections which (as many argued at the time) were unfounded.

That the figures and projections were unfounded has been borne out by subsequent events, namely the Coventry 2021 census.

Added to which is the almost unique position that Coventry now finds itself in; its housing requirements being reduced.

The only sensible conclusion is that the initial removal of land from the green belt was significantly flawed; this is returned to later.

APPROACH TO HOUSING NUMBERS FOR THE REGULATION 19 CONSULTATION

Adopting the approach taken by Gerald Kells to housing numbers;

1. The HEDNA figures should be set aside and the New Standard Methodology (NSM) (as per MHCVLG December 2024) should be used;
2. Using the NSM 27,600 dwellings would be required during the plan period;
3. The plan identifies 31,493 but this should be increased by 4200 (see Gerald Kell's conclusions on Purpose Built Student Accommodation (PBSA) and Windfall). This gives a figure of 35,693 which gives an excess supply of 7,933 (35,693 - 27,600);
4. Whether considered as part of windfall or otherwise, the NPPF 2024 policies on green belt must be considered now and an upward adjustment applied;
5. Whilst not normally strictly relevant to the consultation, the 5 year housing land supply is 5.6 years and as such there should be no further grants of permission on former green belt land.

THE DUTY TO COOPERATE WITH NEIGHBOURING AUTHORITIES

This is acknowledged as being an important part of the planning process.

However, any acceptance by Coventry in future of housing requirements placed on other areas should be confined to the existing built up area within Coventry and not on land which is former green belt . In short , there is no case to transfer a housing requirement from one green field outside Coventry to a green field within Coventry.

Taking a focus purely on the Keresley SUE, there are areas which are not subject to planning permission , and as Mark Sullivan notes , these areas should be returned to the green belt and should not be used for any housing which Coventry accepts in future under the duty to co operate . There is one parcel which does not have permission to the west of Fivefield Road which I do not include in this comment as it is a case worthy of specific attention.

The case for exception circumstances is made below in respect of land in the northern part of the Keresley SUE

RETURN OF LAND TO THE GREEN BELT WITHIN THE KERESLEY SUE

There are exception circumstances warranting the return of land to the green belt at Keresley . This relates to the following land;

1. The Alders ancient woodland;
2. Pikethorne Wood ancient woodland;
3. Hall Yard Wood ancient woodland at the northern most bend in Fivefield Road ;
4. Bunsen's Wood ;
5. Keresley Mere (adjacent to Pikethorne Wood and the Alders) plus adjacent fields;
6. Hounds Hill (one of the highest points in Coventry (and possibly the highest) with the exception of any part of the nearby Burrough Hill which lies on Coventry) .
7. Thompson's Lane (the medieval lane where adjacent to Hounds Hill) leading from Fivefield Road ;
8. Any land to the north between these areas and the Coventry border with North Warwickshire not currently having permission.

These areas meet the test for inclusion in the green belt as set out in the current NPPF (in the same way that they did prior to being removed) and the nearby permitted housing strengthens (not weakens) the case for inclusion .

EXCEPTIONAL CIRCUMSTANCES

The following in my view amounts to exceptional circumstances;

1. **Subsequent evidence in the census and recent government reduction in housing requirements for Coventry bears out what objectors to the local plan stated , namely that the local plan was flawed in removing so much land from the green belt . This in itself calls for a review of green belt boundaries and return of land which still meets the NPPF tests in para 134.**
2. **Coventry City Council's (CCC) attitude to its own local plan and its failure to comply with its own stated policies as detailed in the next paragraphs.**
3. **Eastern Green SUE clearly states a total of 2250 (which on any reading of the word can only mean a maximum) . Yet CCC has approved 3250 . This is a total failure of CCC in applying it's own local plan. The same approach should not be allowed to take place at Keresley . The plan should be transparent and fairly applied .**

4. The Keresley SUE figure is 3100 . At the time of writing around 2950 dwellings have already received permission . Please see appendix A for the details. Land is still available within the SUE other than the land at Hounds Hill and to the north up to the Coventry boundary , particularly on land to the west of Fivefield Road (please see later on this).
5. The antithesis of good planning by CCC in not requiring a coordinated masterplan for the Keresley SUE . Representations were made prior to the adoption of the Coventry plan for the need for a phased approach so that members of the public and interested bodies could see what was happening and comment on it .
6. The antithesis of good planning by CCC in approving several uncoordinated parcels of land for residential permission . As such , it is unclear how, where and when the required infrastructure (which was a fundamental part of CCC's argument that the Keresley SUE would be " sustainable") .
7. The antithesis of good planning by Coventry in not requiring a coordinated access system so that all adjacent parts of the SUE would be able to link into a common road network . This brings me onto the issues relating to land to the west (or southwest in some cases) of numbers 15 to 47 Fivefield Road which seemingly does not have a point of access into other approved areas.
8. Several approaches have been made to homeowners of that stretch so that sufficient houses can be demolished to create an access point onto Fivefield Road . This suggests that there is a ransom situation going on . Had there been a coordinated plan as there should have been , this parlous situation would not have arisen.
9. This issue is exacerbated by the possibility that access will be taken through the site of demolished houses and where will that access be ? The only answer (and this is not supported) would be onto the south-eastern part of Fivefield Road (its south-eastern end) which Coventry has stipulated on existing permissions that only a limited number of houses should have access too.
10. This land will inevitably come forward during the plan period and is capable on its own of accommodating the remaining dwellings (approx. 150) in the SUE which does not have permission (3100 TOTAL minus approx. 2950 dwellings already approved) .
11. There are additional flaws in CCC's approach to its plan , namely not requiring provisions on granted permissions at Keresley to the requirement in HS1 of its plan to achieve enhanced connectivity between ancient woodlands . This is evident in relation to the two permissions granted next to ancient woodland ; adjacent to The Alders and adjacent to Bunsen's Wood . There has been no realistic attempt to achieve this in either permission.
12. In fact regarding the permission granted to Richborough Estates adjacent to Bunsen's Wood , this is exacerbated by approving a layout which is consistent with a road link to Hounds Hill . This is not so much enhancing connectivity between ancient woodlands as actually undermining it .
13. The next series of points are related to Coventry's failure either to impose enforceable conditions or to actually enforce or be able to enforce those that it has . This is again the antithesis of good planning.
14. Enforcement of traffic routes in and around Fivefield Road proved impossible necessitating a consultation to vary it informally .
15. Failure to properly enforce the condition requiring no development within a buffer next to the Alders ; development includes all forms of development , not just buildings , and the condition should have been enforced to prevent any development of any sort (including drainage systems to deal with surface water run off) .

16. Failure to consider the flooding impacts of granting permission to Richborough Estates for land running from Bunsen's Wood downwards to the lowest point in the area next to Ravenswood and Bennet's Road . An inadequate drainage system has been approved and CCC has reportedly purported to decline to take any action itself . Further development will only make worse an already dire situation.

In short CCC has totally failed the residents of Keresley in its actions to date.

THE CASE FOR RETURN OF LAND TO THE GREEN BELT (HOUNDS HILL AND LAND REFERRED TO ABOVE INCLUDING KERESLEY MERE AND ADJACENT FIELDS , THE FOUR ANCIENT WOODLANDS. THOMPSONS LANE).

Matters relating to exceptional circumstances are set out above .

The land met the tests for inclusion in the green belt from its inception decades ago . The land still does meet those tests without exception . In fact the granting of permissions in the area to the south strengthens the need to maintain the openness of these areas right up to the Coventry northern boundary.

The Hounds Hill land itself is especially important in this respect , is very visible , provides a perfect buffer in conjunction with the other land referred to , lying as it does on the high ground between the four ancient woodlands, Hall Yard, Bunsens, Pikethorne Wood and the Alders , and linking with open land to the north right up to the Coventry boundary.

OTHER IMPORTANT MATTERS

Hounds Hill also and has for many years (certainly going back to the 1960s) been the nesting places for the skylark, which is on the red list .

Also attached is Appendix B which comprises extracts from Warwickshire Biodiversity which emphasises the richness of bioversity in the area .

Finally the historic interest in the area ; Fivefield Road and Thompsons Lane are medieval . The area has long been inhabited (note the nearby Burrough Hill) providing good defensive location with easy access to fresh water (the spring which now feeds Keresley Mere , long since culverted) and even the location of a medieval moated manor house (again fed by the nearby spring)

CONCLUSIONS

In conclusion;

1. The CPRE submission is supported .
2. The plan is unsound in retaining the whole of land within the Keresley SUE outside the green belt .
3. Land referred to above should be returned to the green belt . The same might apply to other areas too elsewhere in Coventry .
4. It should be made absolutely crystal clear that when the plan refers to a " total " of 3100 dwellings in the Keresley SUE , that " total " does indeed mean what the vast majority would mean as being a " maximum "

