



Land at Gibbet Hill Road

Response to Coventry Local Plan Review Regulation 19 (Proposed Submission) Consultation

March 2025

Representation made on behalf of **Catesby Estates**

Catesby Estates
part of Urban&Civic

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Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU
Office Address: 10th Floor, Bank House, 8 Cherry Street, Birmingham, B2 5AL T: +44 (0) 121 633 2900
E: birmingham.uk@stantec.com

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	Name	Position	Signature	Date
Prepared by:	Ben Cook	Planning Director	Associate	February 2025
For and on behalf of Stantec UK Limited				

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1 Introduction

1.1.1 Stantec is instructed by Catesby Estates PLC ('Catesby Estates') to submit a representation to the Coventry City Council Local Plan Regulation 19 (Proposed Submission) Consultation (hereafter referred to as 'the Proposed Submission Plan') in respect of its land interest at Land at Gibbet Hill Road ('the Site')¹.

1.1.2 This Site lies cross-boundary with Warwick District, with approximately 2.3 hectares being located within Coventry City and 21.4 hectares within Warwick (see Site Location Plan at **Appendix 1**). Catesby Estates is working with the landowners to bring forward the Site and has promoted the Site through both the Coventry Local Plan Review and the South Warwickshire Local Plan. Stantec also submitted a response to the University of Warwick Draft Campus Framework Masterplan Supplementary Planning Document consultation held by Warwick District Council in June 2024.

1.1.3 For reference, the Site in its entirety has capacity for around 500 dwellings, set within a framework of open spaces and is identified within a wider "Strategic Growth Location" (SG01 South of Coventry Group) within the Regulation 18 Part 2 version of the South Warwickshire Local Plan that is currently undergoing consultation until 7th March 2025 (see extract at **Appendix 2**).

1.1.4 The Vision Document included at **Appendix 3** sets out more information relating to the site, in conjunction with the Concept Masterplan at **Appendix 4**. The main vision seeks to create a community based upon the principles established by the 20-minute neighbourhood to help address the challenges of climate change and seek to improve the health and wellbeing of all who live in Coventry and South Warwickshire. The Site can make an important contribution to meeting housing requirements and can be built out relatively quickly given it is not reliant on significant infrastructure.

1.1.5 This representation comments on the relevant policies of the Proposed Submission Plan as well as relevant documents within the evidence base as follows:

- Overall Levels of Growth Background Paper (November 2024)
- Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (November 2022)
- Review of Coventry's Local Housing Need (June 2024)
- Housing Background Paper (November 2024)
- Housing and Economic Land Availability Assessment (November 2024)
- Green Belt and Green Environment Background Paper (November 2024)

¹ Land at Gibett Hill Road has previously been promoted by L&Q Estates. However, Urban&Civic Plc, which includes Catesby Estates, acquired L&Q Estates from L&Q Group as of 6th August 2024. The Site is accordingly now being brought forward by Catesby Estates in partnership with the landowner.

- Green Belt Technical Update Study (July 2024)
- Sustainability Appraisal and Strategic Environmental Assessment Report (October 2024)

1.1.6 This representation will have the underlying aim of ensuring that all policies are legally compliant and align with the 'tests of soundness' as outlined at Paragraph 36 of the National Planning Policy Framework ('NPPF'). These include the following:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.1.7 As drafted, Catesby Estates believes that the Proposed Submission Plan is not sound as:

- The plan period of 2021-2041 is unlikely to cover a minimum period of 15 years from the date the Local Plan Review will be adopted (likely to be 2026). This is not consistent with National Policy.
- The proposed overall level of housing growth fails to meet Coventry's Local Housing Need and fails to take into account reasonable alternatives, including meeting the Council's own affordable housing need or unmet need arising from elsewhere. It is therefore not positively prepared or justified. The overall level of growth is also not consistent with national policy in its approach to quantifying an overarching housing requirement.
- There is a distinct lack of evidence to suggest that the Council has complied with the duty-to-cooperate, such as statements of common ground with any stakeholders, including neighbouring authorities.
- The Council's approach to local green space is unsound as it is not Justified or Effective, as it is not based upon accurate evidence.

1.1.8 As such, Catesby Estates wishes to attend the Local Plan Examination Hearing Sessions in order to further explain the modifications that are considered necessary in order for the Plan to be found sound.

2 National Planning Policy Framework (December 2024)

- 2.1.1 The Government published and updated version of the National Planning Policy Framework ('NPPF') in December 2024, with a further correction update in February 2025.
- 2.1.2 This was accompanied by changes to the Standard Method for calculating housing need, which resulted in revised Local Housing Need figures for the majority of local planning authorities within England.

2.2 Transitional Arrangements

- 2.2.1 The updated NPPF contains transitional arrangements for the purposes of plan-making which are set out at Paragraph 234 onwards.
- 2.2.2 Paragraphs 234 to 237 state:

234. For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:

- a. the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need;*
- b. the plan has been submitted for examination under Regulation 22 on or before 12 March 2025;*
- c. the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020;*
- d. the local plan is for an area where there is an operative Spatial Development Strategy and the local plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025; or*
- e. the plan deals only with minerals and/or waste matters and has reached Regulation 19 on or before 12 March 2025; or has been submitted for examination under Regulation 22 on or before 12 March 2025.*

235. Where paragraph 234a, b, c, d or e apply, the plan will be examined under the relevant previous version of the Framework.

236. Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the

relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.

237. Those local plans that reach Regulation 19 (pre-submission stage) on or before 12 March 2025 and whose draft housing requirement meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the plan has to return to the Regulation 18 stage.

2.2.3 In relation to the above, Coventry City Council is progressing its Local Plan Review under Paragraph 234a.

2.2.4 In this regard, the revised Local Housing Need figure for Coventry City derived from the new Standard Method is 1,388 dwellings per annum. The housing requirement figure contained within the Regulation 19 Proposed Submission Plan is 1,455 dwellings per annum and the draft Plan accordingly complies with the provision of Paragraph 234a.

2.2.5 The Proposed Submission Plan will accordingly be examined under the relevant previous version of the Framework (the 2023 version of the NPPF).

2.3 National Planning Policy Framework (2023)

Plan-Making and Soundness

2.3.1 Paragraph 16 of the NPPF confirms that Plans should:

- a) *be prepared with the objective of contributing to the achievement of sustainable development;*
- b) *be prepared positively, in a way that is aspirational but deliverable;*
- c) *be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) *contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) *be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) *serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.3.2 Paragraph 35 sets out the tests which Local Plans are assessed against at examination. Plans are 'sound' if they are:

“a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other

authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

Duty to Cooperate

2.3.3 The NPPF also reaffirms the duty of local planning authorities to cooperate with each other on strategic matters that cross administrative boundaries and it sets out that effective strategic planning across local authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience

2.3.4 Paragraph 27 goes on to confirm that, in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan-making process to provide transparency.

2.4 Provision of Homes

2.4.1 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance, unless exceptional circumstances justify an alternative approach. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.5 Green Belt

2.5.1 Paragraph 146 confirms that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified.

2.6 Planning Practice Guidance

2.6.1 Planning Practice Guidance (PPG) provides further advice on Plan making and how these tests can be met. Throughout these representations, we set out whether we consider specific policies comply with the tests of soundness as set out above.

3 General Comments

3.1 Plan Period

3.1.1 The Local Plan Review relates to a period 2021-2041 (the Local Plan Review itself refers to a period 'up to' 2041 i.e ending 31st December 2040). In this regard, Paragraph 22 of the NPPF confirms that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

3.1.2 The Council's latest Local Development Scheme (December 2024) indicates that the Local Plan Review is expected to follow the below timetable:

- Regulation 19 Consultation – January to March 2025 (Now)
- Submission to the Secretary of State for Examination – April to June 2025
- Examination in Public – July to September 2025
- Adoption – October to December 2025

3.1.3 Whilst it is appreciated that the Regulation 19 consultation is currently taking place in accordance with the anticipated timetable, it is considered that the assumption that the Plan will be submitted, examined and adopted by the end of 2025 is optimistic (particularly given the content of the representation which documents that the Plan is currently unsound).

3.1.4 It is more likely that, if the Plan is found sound at examination, it would be following a series of modifications that would require further consultation, meaning the adoption date would be pushed back into 2026.

3.1.5 As such, the plan-period would only cover a period of 14 years; 2026 to 2040 inclusive, which is not consistent with National Policy.

Required Changes

3.1.6 The plan-period should accordingly be extended by a year to cover this eventuality, including the resulting implications such as planning for an additional years' worth of development requirements (housing and employment).

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

4.1 Key evidence:

- Housing and Economic Development Needs Assessment ('HEDNA') (2022)
- Review of Coventry's Local Housing Need (2024)
- Employment Land Review and Office Market Addendum (2024)
- West Midlands Strategic Employment Sites Study (2024) and Coventry and
- Warwickshire Alignment Paper (2024)
- Growth and Duty to Co-operate Background papers (2024)

4.2 Policy DS1: Overall Development Needs

Housing Need

- 4.2.1 In terms of housing, the NPPF (December 2023) sets out in Paragraph 61 that strategic policies should be informed by a local housing need assessment, conducted using the standard method which is an 'advisory starting point'. However, it goes on to explain that there may be exceptional circumstances which justify using an alternative approach.
- 4.2.2 In Coventry's case, the Coventry and Warwickshire HEDNA (2022) concluded that the population estimates derived from the 2021 Census data had been significantly over-estimated. Coventry City Council has accordingly concluded that exceptional circumstances exist to deviate from the Standard Method because the data upon which the Standard Method was based utilised erroneous data.
- 4.2.3 Given that new data had emerged since the production of the HEDNA in 2022, Coventry City Council commissioned an update in relation to its own housing need (Review of Coventry's Local Housing Need June 2024) which concluded that the HEDNA remained a reliable basis for plan-making.
- 4.2.4 The Local Housing Need for Coventry contained within the Proposed Submission Plan is therefore 29,100 (1,455 per annum) and this is reflected in Policy DS1 (as a minimum requirement).
- 4.2.5 Further commentary regarding the detailed composition of this figure is discussed below in relation to Policy H1: Housing Land Requirements.
- 4.2.6 It should nonetheless be stressed that that local housing need is not the same as the housing requirement to be set out in the Local Plan. The Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67. This includes

consideration of unmet housing needs from neighbouring authorities and delivering additional development to meet prevailing affordable housing need. These are discussed in turn below.

Unmet Housing Need from Neighbouring Authorities

- 4.2.7 There is a catalogue of evidence to document the fact that there are strong functional relations between the Coventry and Warwickshire Housing Market Area ('CWHMA') and the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA'). A number of position statements have been published historically which detail significant unmet housing needs arising from those areas which need addressing in this Plan.
- 4.2.8 The most recent GBBCHMA Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings with total contributions of only 18,181 dwellings committed. These figures are now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. However, it is understood that work is underway to update the Position Statement to 2025, and we still expect this work to still identify a significant deficit in supply across the GBBCHMA.
- 4.2.9 This shortfall should be taken into account in the preparation of the Coventry Local Plan Review.

Affordable Housing Need Within Coventry

- 4.2.10 The Coventry and Warwickshire HEDNA (November 2022) concludes that the analysis identifies a “*notable*” need for affordable housing, and “*it is clear that provision of new affordable housing is an important and pressing issue in the area*”. Whilst it does stress that the HEDNA findings do not provide an affordable housing target, the evidence does suggest that affordable “*housing delivery should be maximised where opportunities arise*”.
- 4.2.11 Nonetheless, Table 8.45 of the HEDNA indicates a total annual need of 2,035 affordable homes within Coventry.
- 4.2.12 Whilst it is accepted that this does not directly translate into an affordable housing target to be planned for within the Local Plan Review, it remains self-evident that the Local Plan Review will not deliver anywhere near the level of affordable housing identified as being needed within the City. As a high-level example (and notwithstanding comments elsewhere within this Representation) the Council is seeking to deliver 1,455 dwellings per annum. Policy H6 (Affordable Housing) will require 25% of developments on sites of 10 or more dwellings to be affordable. Assuming that all developments will take place on sites of 10 dwellings or more (which they will not), the Local Plan Review would deliver approximately 364 affordable dwellings per year. This represents only a quarter of the need identified within the HEDNA and is realistically an overly optimistic estimate of delivery.

Growth Options Tested by the Council

- 4.2.13 Table 4.2a of the Sustainability Appraisal (October 2024) makes clear that the Council tested five growth options as follows:
 - Standard Method (2014) – 63,760 dwellings
 - Standard Method (2022) – 39,280 dwellings

- Standard Method (2022) less 35% - 29,100 dwellings
- Capacity Led Quantum – 31,500 dwellings
- Proposed Standard Method (2024) – 30,540 dwellings

4.2.14 The Growth Needs Background Paper (November 2024), however, makes clear that the Council has only ever realistically considered three options as follows:

- Standard Method (2014) – 3,188 dwellings per annum
- HEDNA – 1,964 dwellings per annum
- HEDNA less 35% – 1,455 dwellings per annum

4.2.15 It is therefore evident that the Council has not fully engaged with the requirement of Paragraph 61 of the NPPF in determining the minimum number of homes needed in order to establish an overall housing requirement.

Deviation from the Standard Method

4.2.16 As set out in our previous representation, Catesby Estates recognises the Council's argument that exceptional circumstances potentially exist to justify using an alternate approach to calculating housing need than the Standard Method (those circumstances being those relating to the population growth for Coventry appears to be systematically over-estimated, which leads to trend-based projections that are demonstrably too high). This is a locally specific issue that is unique to Coventry.

Removal of the Urban Cities Uplift

4.2.17 However, the Local Housing Need figure of 1,455 per annum also serves to remove the 35% Urban Cities uplift that is contained within the Standard Method. With this uplift added, the Local Housing figure would be 1,964 dwellings per annum (39,280 dwellings over the Plan period).

4.2.18 Both the Growth Needs Background Paper (November 2024) and the HEDNA (November 2022) recognise that the Uplift is separate to the Local Housing Need calculation and is a figure which had been applied to the 'top 20' cities by the Government with the intention of increasing housing delivery in those cities considered to be the most sustainable.

4.2.19 Notwithstanding this, the Council has sought to remove the Urban Cities uplift from its overall housing requirement, arguing:

“...the NPPF (either 2021 or 2023 iterations) makes no mention of an uplift when applied to a justified alternative approach, but states that any alternative approach must reflect ‘current and future demographic trends and market signals’ (NPPF 2021 and 2023, para.61), which the HEDNA has done.”

“...as set out in the PPG, any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method. Therefore, whilst the HEDNA

included a 35% uplift this was a separate figure unrelated to local need, and the Council retains its stance that the imposition of the uplift (to the national Standard Method) does not mean that it is fair, evidenced, reasonable or justifiable. The 35% uplift figure was included in the HEDNA which followed the calculation steps of the Standard Method, but notwithstanding this the HEDNA methodology is a separate, and alternative approach which is justified in its own right in terms of identifying local need.”

4.2.20 It is submitted that the Council's approach to calculating its overall requirement is incorrect, principally due to a conflation between housing need and a housing requirement.

4.2.21 The Council themselves recognise that, whilst the 35% uplift does form part of the Standard Method calculation, it is nonetheless separate to the initial calculation of Local Housing Need. The Council has nonetheless used the same justification (that there are issues with the data for determining initial local housing need) for not applying the uplift which ultimately results in the overall housing requirement.

4.2.22 In this vein, whilst Paragraph 61 of the NPPF does allow for exceptional circumstances which justify an alternative approach to assessing housing need, including local demographics, Paragraph 61 does not allow for a complete deviation away from the Standard Method when considering the overall housing requirement. This is evident from the final sentence of Paragraph 61, which states:

“In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.

4.2.23 Whilst this Paragraph is predominantly discussing unmet needs from neighbouring areas, the phrase *“in addition to the local housing need figure”* is clear that all of the proceeding text only applies to the calculation of housing need, whereas the Urban Cities uplift is applied on top of the local housing need figure to provide the overall housing requirement.

4.2.24 This is also established by Paragraph 62 of the NPPF which goes on to state:

“The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework.”

4.2.25 The fact that Paragraph 62 is separate from the preceding paragraph again emphasises the fact that the urban cities uplift is entirely separate and should be applied in addition to the local housing need figure, which in this case is derived from the HEDNA.

4.2.26 Put simply, the HEDNA potentially provides justification for utilising an alternate approach in respect of calculating need at the local level. It does not provide justification for deviating away from the 35% uplift, which is an uplift applied nationally as part of a growth agenda i.e it is not unique to Coventry. If it was sufficient to not provide the 35% uplift because it was felt that it

was not “*fair, evidenced, reasonable or justifiable*”, then none of the top 20 cities subject to the uplift would have provided it.

4.2.27 It is therefore clear that the Council has erroneously calculated its overall housing requirement, which should instead be 1,964 dwellings per annum (39,280 for the plan period 2021 – 2041) as a minimum, exclusive of any additional buffer or allowance for economic growth or market competition.

Soundness

4.2.28 It is therefore evident that Policy DS1 is not sound, as it is not:

- Positively prepared – the overall levels of growth fail to meet Coventry’s local housing need in a number of aspects.
- Justified – the overall levels of growth are not sufficient and do not take into account or consider reasonable alternatives.
- Consistent with National Policy – the overall level of growth is not consistent with national policy in its approach to quantifying an overarching housing requirement.

Required Changes

4.2.29 In order for Policy DS1 to be considered sound the Council needs to:

- Revisit its proposed housing requirement. From our analysis, we believe the housing requirement should be around 3,301 dwellings per annum, or 66,020 dwellings over the Plan period as a minimum, comprised of:
 - 1,964 dwellings per annum (HENDA plus 35% urban centres uplift)
 - Uplift to support affordable housing delivery within Coventry (uplift to be determined by the Council but for this exercise assumed to be a 20% uplift above local housing need i.e an additional 590 dwellings per annum)
 - Uplift to support meeting unmet housing need from the GBBCHMA and the CWHMA (uplift to be determined by engagement with neighbouring authorities but for this exercise assumed to be a 20% uplift above local housing need i.e an additional 590 dwellings per annum)
 - 5% additional allowance for flexibility (5% of 3,144 dwellings per annum [1964 + 590 + 590] = 157 dwellings per annum)

4.3 Policy DS2: The Duty to Co-operate and Partnership Working

4.3.1 The Duty to Co-operate (DtC) is a legal test that requires co-operation between local planning authorities and other public bodies to maximise effectiveness of policies for strategic matters in Local Plans. The Proposed Submission Local Plan suggests that further details in respect of the DtC are set out in the Duty to Co-operate Paper (which is considered below).

Local Plan Review Duty to Co-operate Statement – Regulation 19 Proposed Submission Stage

4.3.2 As described earlier within this representation, Paragraph 27 of the NPPF requires strategic policy-making authorities to prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan-making process to provide transparency.

4.3.3 Put simply, the Council has not done this; there are no statements of common ground available as part of the Proposed Submission Plan evidence base.

4.3.4 In this regard, the Duty to Co-operate Statement states:

“This Duty to Co-operate paper sets out how the Duty is actively being applied in relation to the development of the Coventry Local Plan Review, and will be updated post Regulation 19 as Statements of Common Ground are prepared.”

4.3.5 The Council has accordingly failed to meet the duty in respect of preparing and making statements of common ground publicly available.

4.3.6 Furthermore, whilst the Council has produced a Duty to Co-operate Statement which describes a number of strategic issues relevant to Coventry and Warwickshire, it provides nothing in terms of what has been discussed or agreed with stakeholders in relation to any of these matters. Instead, the Statement describes only how a very limited number of the identified stakeholders responded to the Issues and Options consultation undertaken by the Council.

4.3.7 Regarding overall levels of housing growth, the Statement sets out that:

“Through Issues and Options and subsequent discussions at CSWAPO [Coventry, Solihull and Warwickshire Association of Planning Officers], Coventry has always been clear that it would be proceeding with a housing need number from the HEDNA which reflected local need but did not include the 35% Cities Uplift (a figure set by the previous Government as part of the Standard Method). Through CSWAPO discussion Coventry has always been clear that it did not expect any partners to deliver the cities uplift either as it would be arguing against this through the Local Plan process.”

4.3.8 This does not indicate any level of cooperation or indeed agreement from any members of the CSWAPO. It strongly indicates that Coventry City Council has simply determined its own approach to housing growth and afforded others the opportunity to agree with them.

Policy DS2: The Duty to Co-operate and Partnership Working

4.3.9 Policy DS2 describes a number of ways in which Coventry City Council will approach the DtC, including how it intends to work with neighbouring authorities within its Housing Market Area.

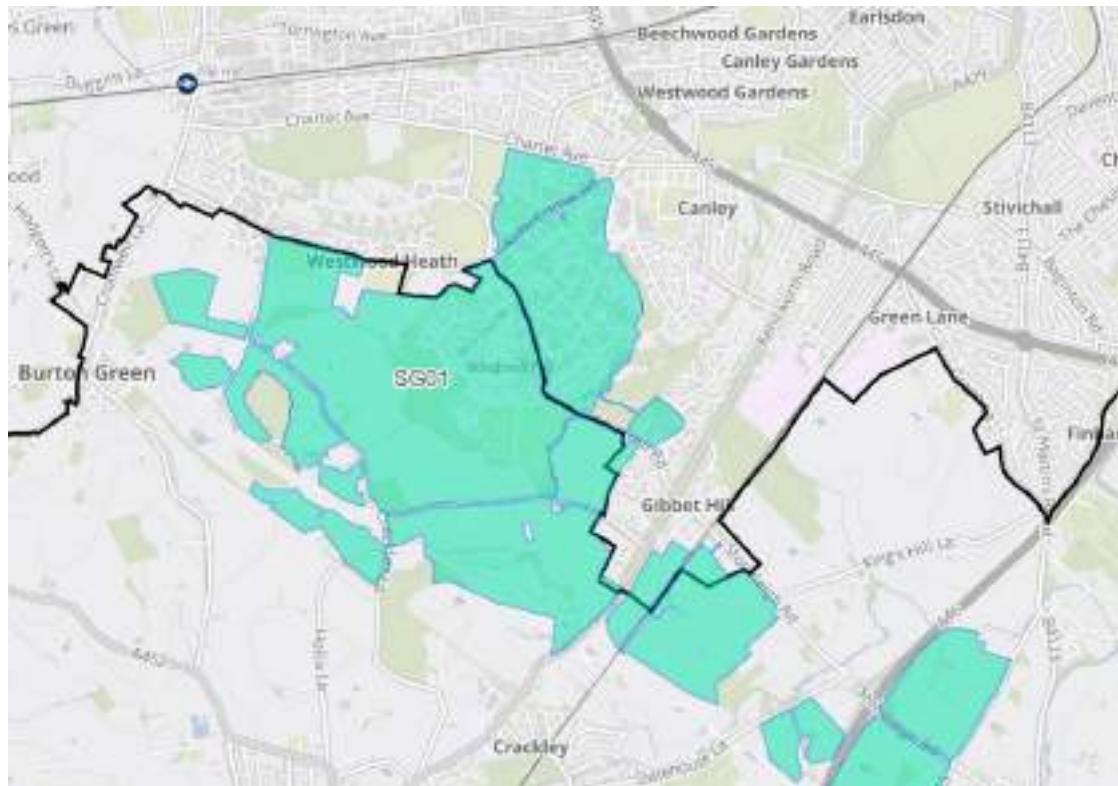
4.3.10 Part 5 of the Policy states:

“Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.”

- 4.3.11 Part 6f then goes on to clarify that this includes proposed residential developments to the south of the city's administrative boundary.
- 4.3.12 Whilst this is supported by Catesby Estates, it is submitted that the Plan does little in reality to support any proposed development to the south of the City boundary.
- 4.3.13 In this regard, Policy GB2 (Safeguarded Land in the Green Belt) identifies four areas of land which were removed from the Green Belt and safeguarded for long term development in the 2017 Coventry Local Plan.
- 4.3.14 In respect of this site, the Proposed Submission Plan states:

“At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.”

- 4.3.15 The above statement is concerning in that a Regulation 18 (Part 2) version of the SWLP is currently undergoing consultation concurrently with the Coventry Local Plan (the SWLP consultation closes four days later on 7th March). The consultation version of the SWLP includes a number of 'Strategic Growth Locations' which represent potential locations for development within the final SWLP. The Strategic Growth Locations include SG01 'South of Coventry' which, as the name suggests, is located around the southern edge of the Coventry City boundary (see SWLP map extract below).



4.3.16 Whilst Land at Gibbet Hill does not fall within the land safeguarded by Policy GB2, the fact that Coventry City Council appear to be unaware of the SWLP consultation or the content therein heavily suggests that the two authorities are not engaging with or co-operating with one another, which represents a failing of the DtC and therefore the Plan.

Soundness

4.3.17 It is therefore evident from the above that the Council has failed the DtC. It has not engaged with relevant stakeholders in any meaningful way (particularly neighbouring planning authorities) and has failed to produce and maintain publicly available statements of common ground as required by the NPPF.

4.3.18 The Local Plan Review is therefore not effective.

Required Changes

4.3.19 A failure to meet the DtC cannot be rectified and constitutes a failing of the Proposed Submission Local Plan. The Plan is therefore not sound.

4.3.20 Notwithstanding, should the Inspectors determine otherwise, land to the south of Coventry within the City boundary, including Land at Gibbet Hill Road, should be safeguarded as a minimum to come forward at such a time when the SWLP progresses to adoption, should it continue to allocate land within Strategic Growth Area SG01 for development.

5 Delivering Coventry's Housing Needs

5.1 Key Evidence

- Housing and Economic Development Needs Assessment (2022)
- Review of Coventry's Local Housing Need (2024)
- Housing and Economic Land Availability Assessment (2024)
- Gypsy and Traveller Accommodation Assessment (2023)
- Viability Assessment (2024)
- Density Study (2024)
- Purpose Built Student Accommodation Market Study (2024)
- Authorities Monitoring Reports
- Coventry City Council Housing and Homelessness Strategy 2019 - 2024
- Coventry City Council Homefinder data
- Housing Background Paper

5.2 Policy H1: Housing Land Requirements

5.2.1 The preamble to Policy H1: Housing Land Requirements describes how the HEDNA identifies a local housing need of 1,455 dwellings per annum, which equates to 29,100 dwellings over the Plan period 2021-2041.

5.2.2 It goes on to describe how, following an assessment of land options through the Call for Sites, the HELAA and a Density Study, a capacity of around 31,954 homes has been identified within the City, which is stated to provide "*a degree of flexibility above the local need figure of 29,100.*"

5.2.3 This capacity / supply is set out within Table 6.1 below within the Proposed Submission Local Plan² (reproduced below).

² Table 6.1 itself appears to be based upon Table 5 within the HELAA, which breaks down the committed supply into a number of component parts including; Sites under construction, Sites with Detailed Planning Permission (not commenced), Sites with Outline Planning Permission and Permitted Development.

Housing Land Supply Components (data to 30/09/2024)	Number of Homes
Past net completions	7,666
Committed supply	13,975
Remaining allocations (2017 Local Plan)	2,733
Proposed new site allocations (local plan review)	3,503
Other identified sites (HELAA)	816
Windfall allowance	2,800
Total	31,493

5.2.4 However, Policy H1 then reiterates that “*Provisions will be made for a minimum of 29,100 additional dwellings between 2021 and 2041.*”

5.2.5 There are a number of interwoven issues here as follows.

Housing Need Versus Housing Requirement

5.2.6 As described previously within this Representation the Council appears to be conflating housing need and housing requirement. The Council is presenting its housing need figure of 1,455 dpa (29,100 over the Plan period) as its requirement.

5.2.7 Table 6.1 presents a ‘capacity’ led figure of 31,493 dwellings, but this is not the figure that is enshrined within the Policy H1.

Buffer or Allowance for Flexibility

5.2.8 The Housing Background Paper (November 2024) reiterates the Council’s position that the housing need figure for Plan is 1,455 per annum or 29,100 over the plan period.

5.2.9 It goes on to state that this “*...has been assessed that this should be a minimum starting point and that this could be met with at least a 5% buffer*”.

5.2.10 The above strongly suggests that the 29,100 dwellings figure is exclusive of any buffer.

5.2.11 A 5% buffer to 29,100 dwellings would be 30,555 dwellings, yet the figure of 31,493 dwellings equates to a buffer of 8.22%.

5.2.12 If the Council intends to deliver its housing need with the addition of a buffer, then the figure inclusive of buffer should be that which is contained within Policy H1 as an overarching requirement figure.

Committed Supply, Windfalls and Lapse Rates

5.2.13 It is not evident from the Council’s evidence, including the HELAA (November 2024), whether a lapse rate has been applied to the dwellings included within the committed supply (13,975).

5.2.14 Regarding windfalls, the HELAA suggests that a windfall allowance of 2,800 dwellings is based on an anticipated supply of 200 dwellings per year (total 4,000 dwellings), with a deduction of 1,200 to avoid double counting of (a) the three monitoring years that have passed (2021/22 to 2023/24), and (b) the upcoming three monitoring years (2024/25 to 2026/27), which are considered to have already been accounted for by extant windfall planning permissions.

5.2.15 Although the Council's windfall allowance has been set at 200 dwellings per year, it suggests that the actual figure is much higher. Table 4 shows that, across 2021-2024, a total of 1,072 dwellings on windfall sites were consented, whilst 859 dwellings were completed; this equates to a lapse rate of 8% and includes both residential and purpose built student accommodation.

5.2.16 The Council suggest this represents a "*conservative approach to the windfall projection*" which "*provides significant leeway to allow for planning permissions that lapse before implementation or are implemented but take much longer than projected to construct*".

5.2.17 Whilst this may be the case as a far as windfall developments are concerned, but it is not apparent whether this is also true for housing allocations or the committed supply (which will include both windfall and allocated sites) or indeed whether the 8% lapse rate is considered to apply to both windfall and consented sites within the overall housing land supply composition.

Remaining allocations (2017 Local Plan)

5.2.18 The Council is proposing to roll forward a number of previous allocations from the 2017 Local Plan, totalling 2,733 dwellings which do not benefit from planning permission.

5.2.19 Whilst the appendices to the HELAA include consideration of sites included within the Plan, the analysis of the appropriateness of the existing housing allocations is scant, with the allocations unanimously being carried forward purely based on the fact that they are allocated within the adopted Local Plan. There is no consideration of why these sites have not come forward in nearly ten years or whether it remains appropriate for them to continue to be allocated in the future.

Other Identified Sites (HELAA)

5.2.20 Housing Land Supply Components contained within Table 6.1 includes 816 dwellings which are identified as "Other identified sites (HELAA)".

5.2.21 It is not clear how these sites have been derived (although presumably through the HELAA).

5.2.22 Nonetheless, it is not clear what status these sites have. They do not appear to be allocations, given they are listed separately. It may be concluded then that they are windfalls, except a separate windfall allowance has also been included in the identified supply.

5.2.23 Catesby Estates is therefore concerned that there appears to be no evidence of the deliverability of these sites. For example, despite 816 being a very specific number, a schedule of these sites has not been provided in any of the evidence base documents. Furthermore, given they are not allocations, it appears as though the Council is attempting to accommodate two separate windfall sources in its overall supply.

5.2.24 Until further evidence and justification is provided for the inclusion of these sites within the identified supply, it is considered that they should be excluded, resulting in the removing of 816 dwellings from the identified supply.

Soundness

5.2.25 Policy H1 is unsound for the same reasons DS1 is unsound as described previously. In addition, it is also not:

- Effective – a number of elements of the Council's identified housing supply are not deliverable over the plan-period.

Required Changes

5.2.26 In order for Policy H1 to be considered sound, the Council needs to revisit its proposed housing requirement as described above. In addition, the Council must reevaluate its identified supply, including identifying additional sites for development in order to fully meet its housing requirement over the plan-period.

5.3 Policy H2: Housing Allocations

Quantum

5.3.1 Policy H2: Housing Allocations relates to a number of housing allocations which are listed in Table 6.2 of the Proposed Submission Plan.

5.3.2 Whilst these allocations are not reproduced in this Representation for brevity, the total number of dwellings within Table 6.2 sum to 15,934. It is not clear how these allocations relate to the figures included in Table 6.1 (reproduced above), given that none of the competent figures within that table individually or collectively sum to 15,934 dwellings. Similarly, the total number of homes (31,493) minus the committed supply and/or net completions still does not equal 15,934 dwellings.

5.3.3 The allocations in Table 6.2 appear to include both existing allocations from the 2017 Local Plan, in addition to new allocations, but it is not clear how these allocations relate to the overall housing requirement described above.

5.3.4 Given the lack of clarity in respect of the allocations in Table 6.2, there is a real and genuine concern that the Proposed Submission Plan does not include enough allocations to meet the identified housing requirement.

Reliance on Brownfield Land

5.3.5 Whilst the NPPF is clear that brownfield land should be prioritised for development, it is also true that an overreliance on brownfield sites has a detrimental impact in other areas.

5.3.6 This includes, for example, deliverability and viability due to complications in arising from issues such as land contamination and remediation. As a result, it is well documented that brownfield sites typically deliver less affordable housing than greenfield sites. In the context of Coventry, this potential reduced affordable housing delivery sits against a backdrop of acute affordable housing need.

5.3.7 The Council should accordingly reconsider balancing its supply with the inclusion of additional greenfield sites, such as Land at Gibbet Hill Road.

Soundness

5.3.8 As such, until clarity is provided in respect of the above, it is submitted that Policy H2 is unsound as it is not clear or effective. Catesby Estates must therefore object to this Policy in its current form.

Required Changes

5.3.9 As with Policy H1, in order for Policy H2 to be considered sound, the Council needs to reevaluate its identified supply, including identifying additional sites for development in order to fully meet its housing requirement over the plan-period.

6 Green Belt and the Environment

6.1 Key Evidence

- Coventry and Warwickshire Joint Green Belt Review (2015)
- Coventry Green Belt Technical Update (2024)
- Strategic Green Infrastructure Study (Coventry, Solihull & Warwickshire) (updated 2024)
- Coventry Green Space Strategy (2010)
- Coventry Urban Fringe Landscape Assessment & Guidance March 2007
- Agricultural Land Classification (2024)
- Green Belt and Green Environment Background Paper

6.2 Policy GB2: Safeguarded Land in the Green Belt

6.2.1 Commentary in respect of this Policy has already been provided in this Representation in relation to Policy DS2: The Duty to Co-operate and Partnership Working and is therefore not repeated again. However, for the avoidance of doubt, it is considered that this Policy is unsound for the reasons set out above.

6.3 Policy GB3: Local Green Space

6.3.1 Policy GB3 concerns Local Green Spaces. The preamble to the Policy confirms that the designation of land as Local Green Space is to protect green areas that are of particular importance to local communities, although no further explanation is provided as to the nature of the importance or what this means in practice.

6.3.2 It goes on to describe how Local Green Spaces were formally designated through the 2017 Local Plan and are shown on the Policies Map.

6.3.3 It concludes that Policies for managing development within a Local Green Space should be consistent with those for Green Belts, as described within the NPPF.

6.3.4 Catesby Estates does not object to the wording of the Policy itself (that Local Green spaces should be considered consistently with Green Belt Policy within the NPPF). However, Catesby Estates objects to the designation of an area of Local Green Space shown on the Policy Map itself. This area of land is located to the south of Gibbet Hill Road and is within the control of Catesby Estates.

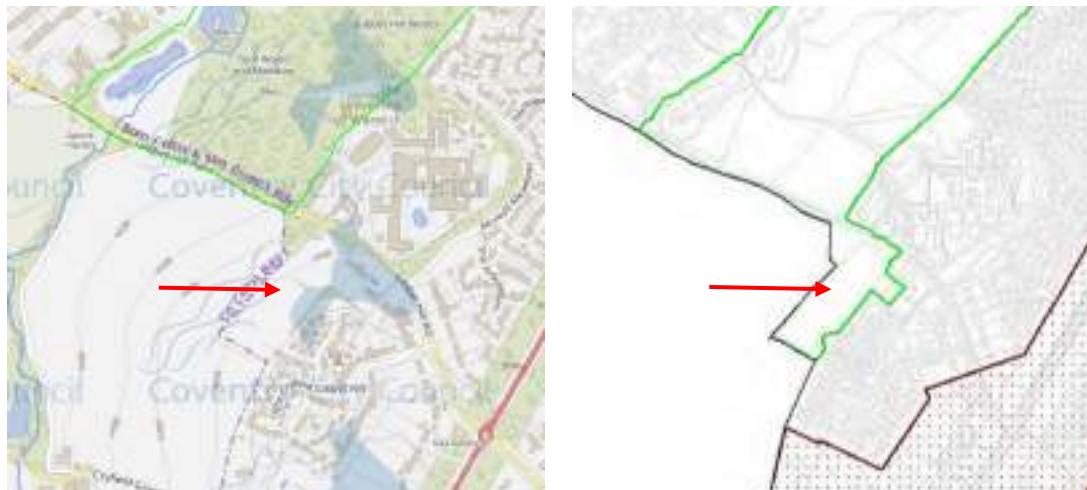
6.3.5 As above, the preamble identifies two elements to Local Green Spaces:

1. They were formally designated through the 2017 Local Plan; and
2. They are of particular importance to local communities.

6.3.6 These two matters are discussed in turn below.

2017 Local Plan

6.3.7 A comparison of the Policies Map from the adopted 2017 Local Plan and the Proposed Submission Local Plan is included below.



Extract from the adopted 2017 Local Plan Policies Map, with Local Green Space Designation outlined **green**. The land in question south of Gibbet Hill Road is shown by **red arrow** (added by Stantec) and is not covered by the Local Green Space designation.

Extract from the Proposed Submission Plan Policies Map, with Local Green Space Designation outlined **green**. The land in question south of Gibbet Hill Road is shown by **red arrow** (added by Stantec) and is covered by the Local Green Space designation.

6.3.8 It is evident from the above that, despite the assertions of Policy GB3, the Local Green Space designation has been expanded and altered within the Proposed Submission Plan. This is not supported and has been done without justification, as described below.

Importance to the Local Community

6.3.9 Paragraph 106 of the 2023 NPPF states:

The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.*

6.3.10 In respect of the above, the land in question is in private ownership and is not traversed by any public rights of way or bridleways. There is no public access of any sort to the site.

- 6.3.11 Similarly, the land is heavily screened by vegetation on all four sides and there is therefore no visual connection or interaction between the site and its surroundings. The land has no historical significance nor is it ecologically rich (it is in agricultural use).
- 6.3.12 It accordingly cannot be said that the land is of any importance to the local community and therefore it follows that the land does not meet the criteria for local green space designation.

Soundness

- 6.3.13 As such, Policy GB3 is unsound as it is not Justified or Effective, as it is not based upon accurate evidence.

Required Changes

- 6.3.14 In order for Policy GB3 to be found sound, Land at Gibbet Hill Road should be excluded from the Local Green Space designation on the Local Plan Review Policies Map.

7 Land at Gibbet Hill Road

Site Description

7.1.1 The Site is located approximately 5km to the southwest of Coventry City Centre and directly south of Warwick University campus. The Site in total comprises approximately 23.7ha land, with approximately 2.3 hectares being located within Coventry City and 21.4 hectares within Warwick District. The entirety of the site is currently in agricultural use (arable farming).

7.1.2 The main access point into the Site is off Gibbet Hill Road, with a secondary access track running from the southwest corner of the Site (Cryfield Grange Road) along and up to the northwest corner (Gibbet Hill Road).

7.1.3 The Site is located within the Green Belt but is immediately adjacent to the built-up area of Coventry which is to the north-east.

Context

7.1.4 The Site is surrounded by built form comprising of residential development in the form of detached properties with large independent drives. In addition to this there is also the presence of education facilities which are currently owned and occupied by the University of Warwick.

7.1.5 The Site is well located in relation to the surrounding strategic highway network. Gibbet Hill Road provides access directly to the University of Warwick along with the associated halls of residence for students. The Site is also in an accessible location to the A429 (Kenilworth Road) offers a direct link into Coventry City Centre (to the north) and Kenilworth (to the south).

7.1.6 The Site has access to a sustainable transport network, which is surrounded by a number of bus stops, with the closest bus stop located on the northern boundary of the Site along Gibbet Hill Road; bus services 11 Platinum, 12X Platinum, U1, U1 V, U1A and U1AV all operate from this bus stop. Below is a schedule for the bus services:

- Bus service 11 Platinum operates from Leamington Spa to Coventry (via University of Warwick and Kenilworth) and vice versa; this service runs frequently every 20 minutes.
- Bus service 12X Platinum operates from Canley to University of Coventry and vice versa; this service runs frequently every 30 minutes.
- Bus services U1, U1A, U1 V and U1A V all operate from Warwick Gates to University of Warwick and vice versa; these services run frequently every 30 minutes.
- Bus service X17 operates from Warwick to Coventry and vice versa; this service runs frequently every 30 minutes. Combined, the bus services offer a sub-5 minute frequency.

7.1.7 Canley Station is located approximately 3km northeast of the Site, whilst Tile Hill is located approximately 3.5km northwest, both of which provide connections to key local and national destinations.

- 7.1.8 There are a number of facilities and services in close proximity to the Site (as further detailed within the submitted Vision Document), but there are various uses such as the University of Warwick, café, sports facility, shop and primary school within a 15-minute walk.
- 7.1.9 A public right of way is present beyond the site to the west which is known as Connect2 Kenilworth; this path is also commonly used by cyclists. There may be the opportunity to enhance the existing PRoW and improve pedestrian and cycle connectivity in the area by creating new linkages and recreational routes as part of the proposals. There is a stream which runs along the complete western boundary of the Site which also provides an opportunity to enhance the marine biodiversity.

Planning Policy Designations

- 7.1.10 The Site falls predominantly within Warwick District Council which is currently governed by the Warwick District Local Plan 2011-2029 (adopted September 2017). However, as described above, Warwick District Council is currently preparing a new local plan in conjunction with Stratford on Avon Council, known as the South Warwickshire Local Plan ('SWLP'). The SWLP identifies the site as falling within Strategic Growth Area SG01 (South of Coventry Group), which comprises a potential large strategic urban extension to be refined through the forthcoming Regulation 19 version of the SWLP.

Landscape and Visual Impact

- 7.1.11 As set out above, the technical evidence submitted alongside these representations confirm that the Site can be accommodated in both landscape and Green Belt terms with suitable landscape-led design (see Landscape and Visual Appraisal at **Appendix 5**).

Highways and Access

- 7.1.12 The submitted Transport and Highway Technical Note (**Appendix 6**) and Vision Document shows that the Site enjoys various opportunities and sustainable travel options for future residents. There are also a number of employers and facilities within the local area. An access off Gibbet Hill Road is also feasible. A review of opportunities for vehicular access has been undertaken and demonstrates that two points of access to the Site, which are technically compliant, are deliverable off Gibbet Hill Road within land forming part of the Site or the adopted Highway.

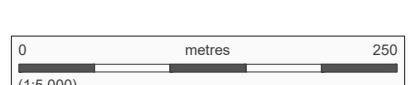
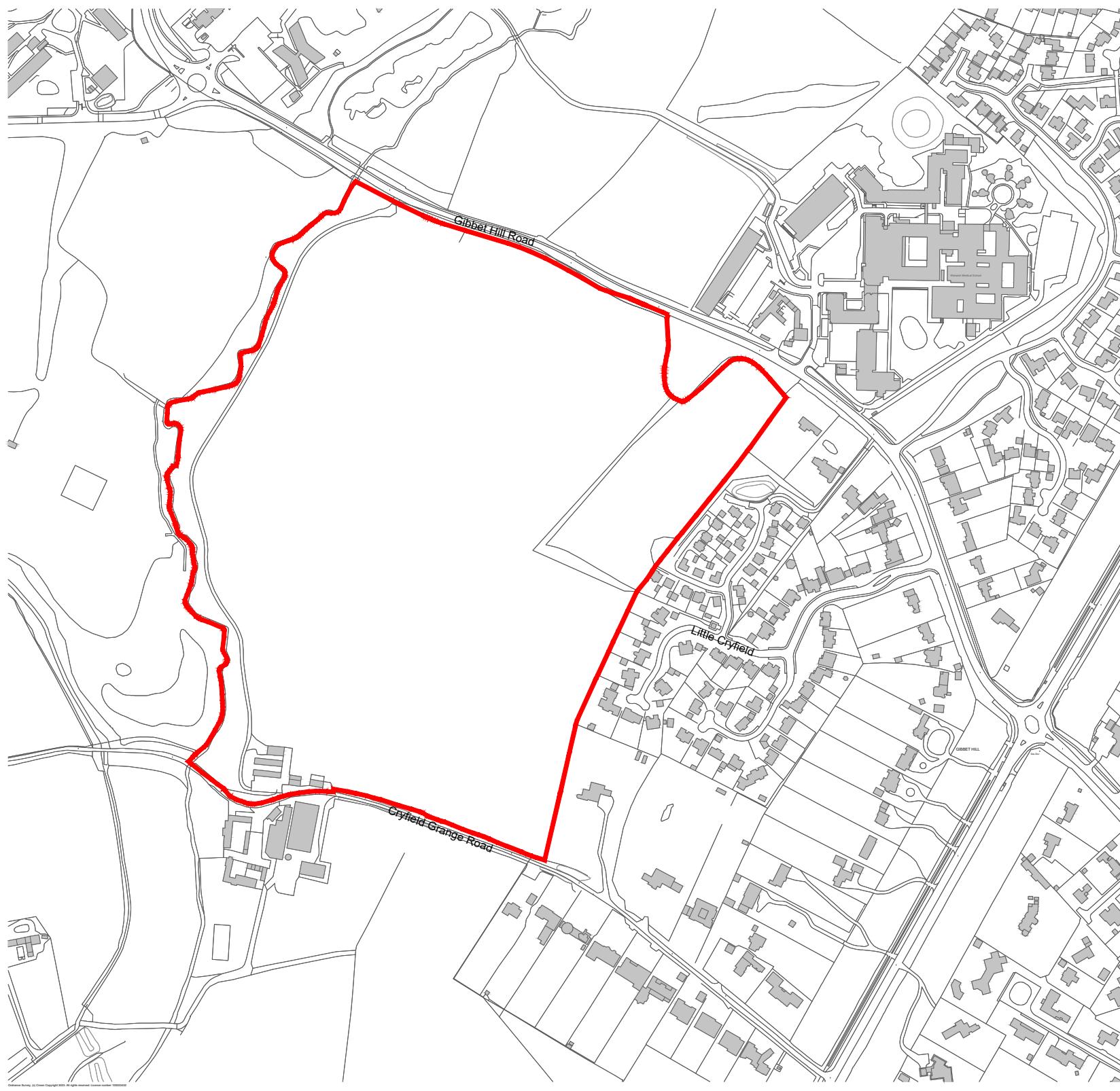
Ecology

- 7.1.13 The submitted Ecological Constraints and Biodiversity Net Gain Feasibility Report (**Appendix 7**) confirms that the proposed development can meet the Biodiversity Net Gain Good Practice Principles for Development

Concept Plan

- 7.1.14 The submitted concept plan shows a landscape-led approach which utilises the existing topography of the Site to provide approximately 500 new high quality and sustainable homes. The concept masterplan focuses on health and wellbeing with a range of features being proposed alongside a network of healthy green streets to promote active travel.

Appendix 1 Site Location Plan



Project
Land at Gibbet Hill, Coventry

Drawing Title
Site Plan

Date 02/03/2023 Scale 1:5,000 at A3 Drawn by
MR Check by
SR
Drawing No 001
Project No 1388

Appendix 2 SWLP Emerging Spatial Growth Strategy Options

South Warwickshire Local Plan

Emerging Spatial Growth Strategy Options

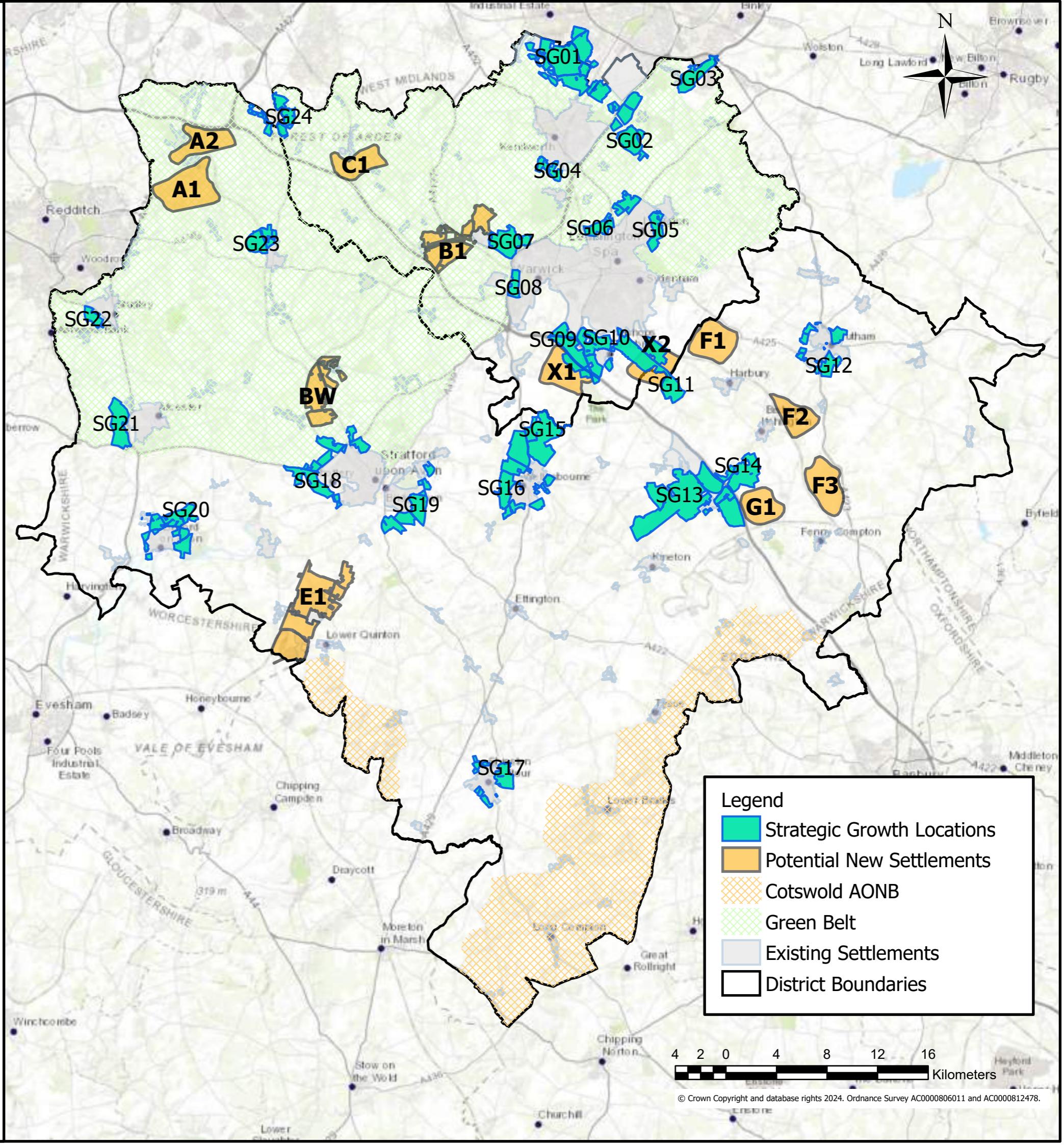


Strategic Growth Locations:

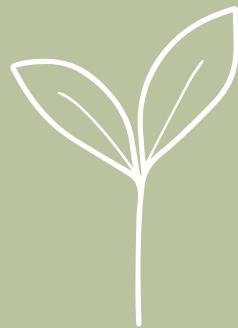
- SG01 - South of Coventry Group
- SG02 - Stoneleigh Park Employment Group
- SG03 - Coventry Airport Group
- SG04 - South of Kenilworth Group
- SG05 - East of Lillington Group
- SG06 - North of Leamington Group
- SG07 - Wedgnock Park Farm Employment Group
- SG08 - West of Warwick Group
- SG09 - South of Europa Way Group
- SG10 - Bishops Tachbrook Group
- SG11 - South East of Whitnash Group
- SG12 - Southam Group
- SG13 - Gaydon Lighthorne Heath Group
- SG14 - East of Gaydon Group
- SG15 - North of Wellesbourne Group
- SG16 - South of Wellesbourne Group
- SG17 - Shipston-on-Stour Group
- SG18 - West of Stratford-Upon-Avon Group
- SG19 - East of Stratford-Upon-Avon Group
- SG20 - Bidford-on-Avon Group
- SG21 - Alcester Group
- SG22 - West of Studley Group
- SG23 - North of Henley-in-Arden Group
- SG24 - Hockley Heath Group

Potential New Settlements:

- A1 - Land south of Tanworth-in-Arden
- A2 - Land east of Wood End
- B1 - Land at Hatton
- C1 - Land south of Kingswood
- E1 - Long Marston Airfield
- F1 - Land to the west of Ufton
- F2 - Lands south of Deppers Bridge
- F3 - Land north-east of Knightcote
- G1 - Land west of Knightcote
- X1 - Land south of Leamington/north of Wellesbourne/east of Barford
- X2 - Land south of Leamington Spa/Whitnash and west of B4455 Fosse Way
- BW - Land at Bearley and Wilmcote



Appendix 3 Vision Document



LAND AT GIBBET HILL ROAD

VISION DOCUMENT

MARCH 2023

**MASTERPLANNING, DESK TOP PUBLISHING AND
GRAPHIC DESIGN BY MOSAIC.**



Masterplanning and graphic design

Spaces

83 Baker Street

London

W1U 6AG

United Kingdom

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Checked by	SR



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01

INTRODUCTION



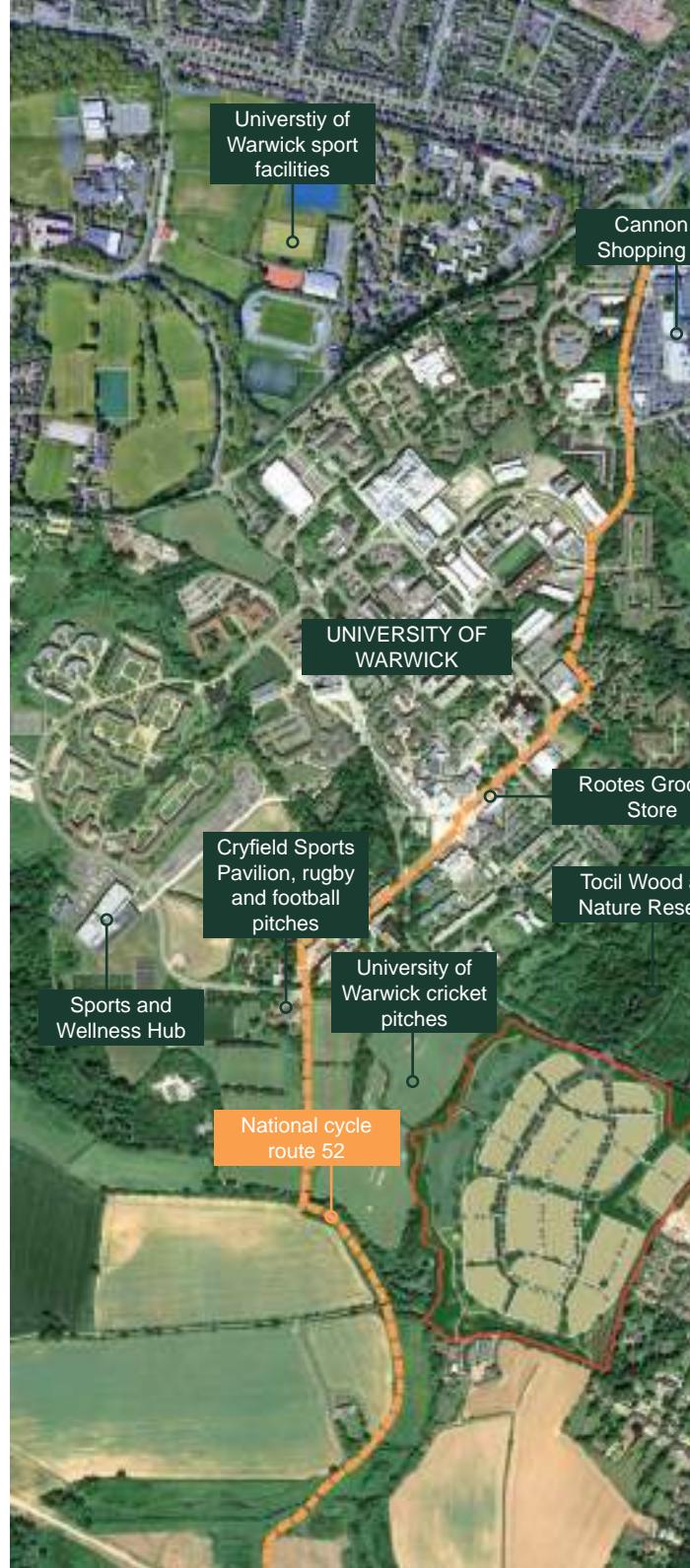
INTRODUCTION

This Vision Document has been prepared by Mosaic on behalf of L&Q Estates Ltd to support the promotion at Land at Gibbet Hill Road, Coventry (the “site”) to deliver much-needed new family and affordable homes as part of the sustainable and comprehensively planned growth of South Warwickshire.

THE VISION

The site presents a fantastic opportunity to sustainably support South Warwickshire’s future growth. In particular, the site can help to achieve its overall vision for the district and five overarching principles set out in South Warwickshire’s Issues and Options Consultation document by creating a community based upon the principles established by the 20-minute neighbourhood. This will help address the challenges of climate change and seek to improve the health and wellbeing of all who live in South Warwickshire and Coventry.

This Vision Document demonstrates that the Land at Gibbet Hill Road is deliverable, technically unconstrained and a sustainable location for new development. This document also sets out a placemaking led vision that delivers up to 500 new homes.







THE TEAM

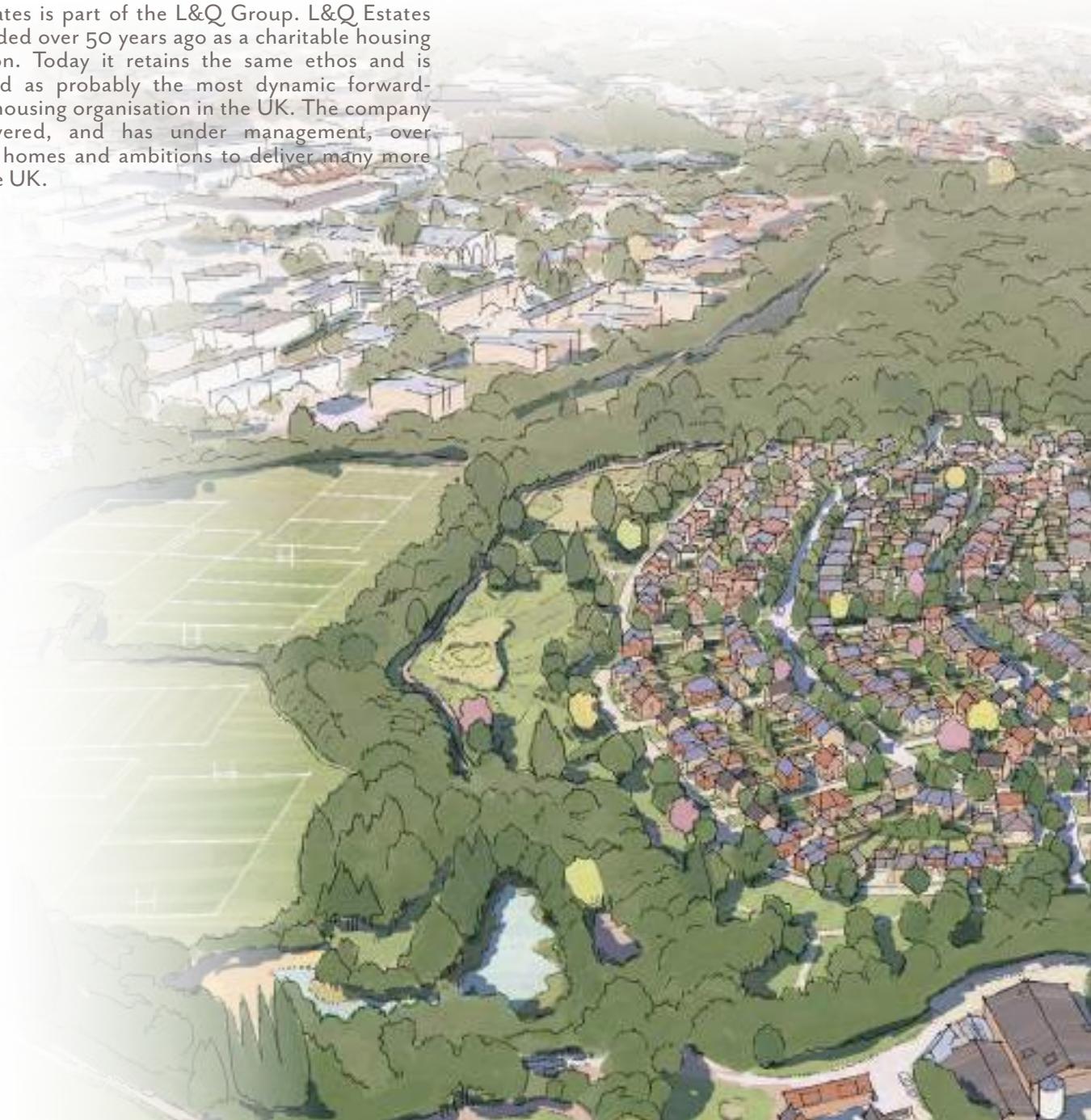
L&Q ESTATES LTD

L&Q Estates Limited (L&Q Estates) is a major strategic land promotion company operating across the UK with a track record for successfully delivering new development for over 60 years. The company has a specific focus on the residential sector and often acts as a 'Master Developer' by retaining responsibility through all stages of the development process. The company facilitates development through the provision of infrastructure and community facilities to enable serviced land parcels to be offered for sale to the house building industry.

L&Q Estates is part of the L&Q Group. L&Q Estates was founded over 50 years ago as a charitable housing association. Today it retains the same ethos and is recognised as probably the most dynamic forward-thinking housing organisation in the UK. The company has delivered, and has under management, over 105,000 homes and ambitions to deliver many more across the UK.

THE DESIGN TEAM

L&Q Estates has assembled an experienced team of consultants to demonstrate the site is technically unconstrained, deliverable and capable of delivering up to 500 new homes at a density of 36 dwellings per hectare

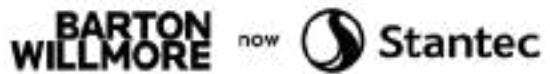




Developer



Masterplanning and graphic design



Town Planning and Landscape



Drainage & Flood Risk



Heritage and ecology



Highways and transportation



Ground Conditions





PLANNING POLICY CONTEXT

NATIONAL POLICY

The National Planning Policy Framework (NPPF) was updated in July 2021, replacing previous versions. It is a material consideration in the determination of planning applications and gives guidance on how Local Planning Authority's should prepare Development Plans. The NPPF sets out the three overarching objectives which, pursued in mutually supportive ways can achieve sustainable development:

- An Economic objective – building a strong, responsive and competitive economy;
- A Social objective – supporting strong, vibrant and healthy communities; and
- An Environmental objective –protecting and enhancing our natural, built and historic environment

Key paragraphs within the NPPF which relate to the promotion of this site include:

- the importance of sufficient and varied land coming forward where needed, to support Government's objective of significantly boosting housing supply (para. 60);
- the need for major residential development to provide at least 10% total number of homes as 'affordable' (para. 65);
- the need for strategic policy-making authorities to identify a housing requirement figure for authority's whole area, including unmet need in neighbouring areas (para. 66) and identification of sufficient supply and mix of sites accounting for availability, suitability, and economic viability (para. 68);
- strategic policy-making authorities should identify suitable locations for large scale development, which can achieve delivery of a large number of new homes, provided they are well located, designed and supported by necessary infrastructure and facilities (para. 73a-e);
- the need to achieve healthy, inclusive and safe places which, *inter alia*, enable and support healthy lifestyles and wellbeing through provision of neighbourhood centres, street layouts/connectivity that encourage walking/cycling, green infrastructure and sports facilities (para. 92 and 93).

Chapter 11 brings the above issues together, requiring planning decisions make effective use of land, ensuring the need for homes and other uses is achieved, while safeguarding and improving the environment and ensuring safe, healthy living conditions. Chapter 12 states that creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

Developments must function well, add to the quality of the area over the development lifetime and visually attractive (through good architecture, layout and appropriate/effective landscaping (para. 130a and 130b). Developments should incorporate trees (paragraph 131).

The site is within the Green Belt. Green Belt policy seeks to prevent urban sprawl by keeping land permanently open (Para. 137); the essential characteristics of Green Belts are their openness and permanence (Para. 138). Green Belts should only be altered where exceptional circumstances are fully evidenced and justified, through preparation or updating of plans. Changes should have regard to the permanence of boundaries, so the Green Belt can endure beyond the plan period (Paragraph 140). Before concluding that exceptional circumstances exist, all other reasonable options for meeting development need should be assessed (Paragraph 141). The need to promote sustainable patterns of development should be considered. Previously developed land or land well-served by public transport should be given first consideration, if Green Belt is to be released (Paragraph 142). Furthermore, review of Green Belt boundaries should demonstrate how the impact of removing land from the Green Belt can be offset through compensatory improvements to environmental quality and accessibility of remaining Green Belt.

Further guidance is provided within the Planning Practice Guidance (PPG); a web-based resource to reflect and support the NPPF which was published in March 2014.

CHANGES TO THE NPPF AND LURB

The Government published the latest proposed revisions to the NPPF on 22nd December 2022. These revisions include ‘immediate’ changes around, *inter alia*, housing need, Standard Method, development density, green belt review. Following the closure of the consultation in early March 2023, an updated version of the NPPF is due to be published.

Beyond this, further changes to the NPPF are proposed including a ‘fuller review’ of the NPPF, which are scheduled to follow passage of the Levelling Up and Regeneration Bill (LURB) through parliament (currently due for completion by Spring 2023). Although the extent of changes to the NPPF (immediate and long-term) are not yet finalised, revisions may have significant implications for forthcoming planning and development, particularly regarding Local Plan progress, site allocations and Local Authority housing targets.

WARWICK LOCAL PLAN (2011-2029) (ADOPTED SEPTEMBER 2017)

The Warwick Local Plan seeks to “make Warwick District a great place to live, work and visit” by focusing on three strategic priorities:

- supporting prosperity
- providing the homes, the district needs
- supporting sustainable communities

The Plan’s spatial strategy focuses on providing growth within and adjacent to built-up/urban areas (including the southern edge of Coventry). The plan seeks to provide 17,139 new homes between 2011 and 2029 (Policy DS7), including 2,245 homes within allocated sites on the edge of Coventry (Policy DS10). An area to the south of Coventry has been safeguarded to meet longer-term strategic development needs beyond the plan period, if needed.

Policy DS19 sets out that the plan will be reviewed (wholly or partially) prior to the end of the plan period if one (or more) of five circumstances are met. This includes development and growth pressures arising in the area to the south of Coventry (as in Policy DS20) and the plan commits to a partial review of this area within 5 years of adoption. Notwithstanding this, given the emerging South Warwickshire Local Plan (Issues and options and Call for Sites consultation on-going to 6th March 2023), this partial review is no longer being pursued.

EMERGING SOUTH WARWICKSHIRE LOCAL PLAN

In October 2020 Stratford-upon-Avon and Warwick District Councils began to produce a new South Warwickshire Local Plan which will replace strategic policies in the existing Stratford-on-Avon Core Strategy and Warwick Local Plan. A second stage Issues and Options Consultation, initially scheduled for November 2022 (subject to a short delay due to availability of an updated HEDNA), received joint committee approval on 7th December 2022 and an eight-week consultation period is now underway (9th January 2023 to 6th March 2023).

It is envisaged that the new Local Plan (Part 1) 'will affect the way we live, work, visit and play in South Warwickshire to 2050' by proposing an overall strategy for the pattern, scale and design quality of places within South Warwickshire. The Plan would ensure provision for, *inter alia*, housing, supporting infrastructure and facilities, conservation and addressing climate change. Five key principles sets out in the current draft document underpin strategic objectives:

- achieving climate resilience and net zero carbon
- achieving well designed and 'beautiful' development
- achieving healthy, safe and inclusive communities
- ensuring South Warwickshire is well connected
- ensuring South Warwickshire is biodiverse and environmentally resilient

Views are being sought on the scope/scale of the Plan, the plan period, and proposed options for growth/spatial strategy. Consultation responses received from the first scoping exercise (completed 5th January 2022) have been considered alongside emerging evidence and five spatial growth options are proposed:

- Option 1: Rail Corridors - focusing growth in rail corridors (existing and re-opening)
- Option 2: Sustainable Travel – focusing on development at 'rail corridors' and 'main bus corridors'
- Option 3: Economy – locating homes close to existing jobs and potential new job locations
- Option 4: Sustainable Travel and Economy - selection of the most suitable locations and avoiding second choice locations in constrained growth option
- Option 5: Dispersed – dispersing growth to a wider range of locations, reducing growth in individual settlements, increasing number of settlements taking some growth

As part of the emerging Local Plan, an area south of Coventry is being tested and is included as a potential area for new housing growth. Land at Gibbet Hill Road sits adjacent to this area, and within the wider masterplanned area.

CLIMATE CHANGE AGENDA:

WARWICK DISTRICT COUNCIL CLIMATE EMERGENCY ACTION PLAN

In June 2019, Warwick District Council declared a climate change emergency. The Council have developed the 'Climate Emergency Action Programme' which seeks to achieve a carbon-neutral district by 2030. The Action Programme recognises the influence of planning in tackling climate change, outlining areas for action:

- Ensure that the planning system sets development and land use standards which reduce carbon emissions and build sustainable communities
- Ensuring the Local Plan minimises the impact of emissions resulting from transport and housing
- A spatial strategy that ensures accessibility by sustainable modes and minimises need to travel
- Policies that will deliver improved net zero carbon building standards
- Integration of open spaces and greenways within development
- Ensure carbon reduction features and BREEAM standards are included in major development schemes

WARWICK DISTRICT COUNCIL NET ZERO CARBON DEVELOPMENT PLAN (EMERGING DPD):

Warwick District Council is preparing a Net Zero Carbon Development Plan Document which will build on existing policy relating to climate change and sustainable buildings and seeks to impose standards to meet the Council's net zero carbon target. Hearing sessions for this are due to commence in March 2023.

The first version of the DPD (August 2022) outlines overarching aim of the document which is to 'minimise carbon emissions from new buildings within the district to support the achievement of national and local carbon reduction targets. The DPD will ensure that new development does not add to the district's carbon deficit and ensure that the significant cost of retrofitting buildings to achieve net zero carbon does not increase'. It is expected that four main objectives will facilitate this (each supported by Policies):

- OBJ1: a clear policy framework enabling developers to understand requirements for planning proposals to ensure new buildings are planned and constructed to be net zero carbon in operation
- OBJ2: practical and viable low carbon building standards that can be applied to new buildings
- OBJ3: support the consideration of low carbon energy sources as part of development proposals
- OBJ4: provide the policy framework for addressing residual carbon from new buildings through a robust carbon offsetting policy

It is pertinent to add that this DPD will likely be superseded by the emerging South Warwickshire Local Plan, however the policies and requirements will remain a consideration.



DESIGN POLICY CONTEXT

The following policies and guidance are relevant in shaping the information contained in this Vision Document.

BUILDING BETTER, BUILDING BEAUTIFUL COMMISSION

The Building Better, Building Beautiful Commission (BBBBC) is an independent body that advises government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods.

The Commission recommends practical measures to help ensure new housing developments meet the needs and expectations of communities, making them more likely to be welcomed, rather than resisted, by existing communities.

The Commission published its final report, 'Living with Beauty', on 30 January 2020.

This report proposes a new development and planning framework that will:

- Ask for Beauty
- Refuse Ugliness
- Promote Stewardship

Those three aims must be embedded in the planning system and in the culture of development in such a way as to incentivise beauty and deter ugliness at every point where the choice arises.

In particular, the BBBBC promotes the following two principles that are particularly relevant to the place making principles of **Land at Gibbet Hill Road**

1. **Neighbourhoods:** Create places not just houses. Develop homes within mixed-use real places at 'gentle density' thereby creating streets, squares and blocks with clear backs and fronts.
2. **Nature:** Re-green our towns and cities. Urban development should be part of the wider ecology. Green spaces, waterways and wildlife habitats should be seen as integral to the urban fabric. Create new community orchards. This is both right and aligned with the Government's aim to eradicate the UK's net carbon contribution by 2050. Green spaces should be enclosed and either safely private or clearly public.

THE GOVERNMENT'S RESPONSE TO BBBBC

Beauty, design quality and placemaking are a strategic theme in proposed revisions to the National Planning Policy.

Several other aspects of the NPPF have also been updated to reflect the Commission's recommendations.

Street trees are a core part of the vision for enhancing the quality of urban development, making our urban environments **greener, healthier and more sustainable**.

Regarding street trees specifically, revisions to the NPPF make clear that new streets should be tree lined unless there are very clear, justifiable and compelling reasons not to.

The Department for Levelling Up, Housing, and Communities commenced consultation on its reforms to national planning policy on 22 December 2022. This maintains a focus on 'asking for beauty', building on the recommendations of the Building Better, Building Beautiful Commission and making changes to the Framework to emphasise the role of beauty and placemaking in strategic policies.

NATIONAL DESIGN GUIDE

The National Design Guide (NDG) sets out the Government's priorities for well-designed places in the form of 10 characteristics. The 10 characteristics are based upon Chapter 12: Achieving well-designed places of the NPPF. They are as follows: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

Well-designed places have individual characteristics that work together to create their physical character. The 10 characteristics help to nurture and sustain a sense of community. They work to positively address environmental issues affecting climate. They all contribute towards the cross-cutting themes for good design set out in the NPPF.

The principles of the NDG have been embedded in the vision for the Land at Gibbet Hill Road site.

NATIONAL MODEL DESIGN CODE

The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the 10 characteristics of good design set out in the NDG which reflects the Government's priorities and provides a common overarching framework for design.

WARWICK'S RESIDENTIAL DESIGN GUIDE

Adopted as an SPD in May 2018, the Warwick District Council's Residential Design Guide identifies local design considerations which provide a design framework for all new residential development. It seeks to promote high quality and innovative design, sensitive to and in keeping with the area it is located.

Land at Gibbet Hill Road will look to adhere where possible to both the Warwick's Residential Design Guide as they develop.

The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.



- Context** – enhances the surroundings.
- Identity** – attractive and distinctive.
- Movement** – a coherent pattern of development.
- Movement** – accessible and easy to move around.
- Nature** – enhanced and optimised.
- Public spaces** – safe, social and inclusive.
- Use** – mixed and integrated.
- Urban and buildings** – functional, healthy and sustainable.
- Resources** – efficient and resilient.
- Lifespan** – made to last.





SITE INTRODUCTION

Land at Gibbet Hill Road is unconstrained and suitable for new homes. The site is available and deliverable being within a single land ownership

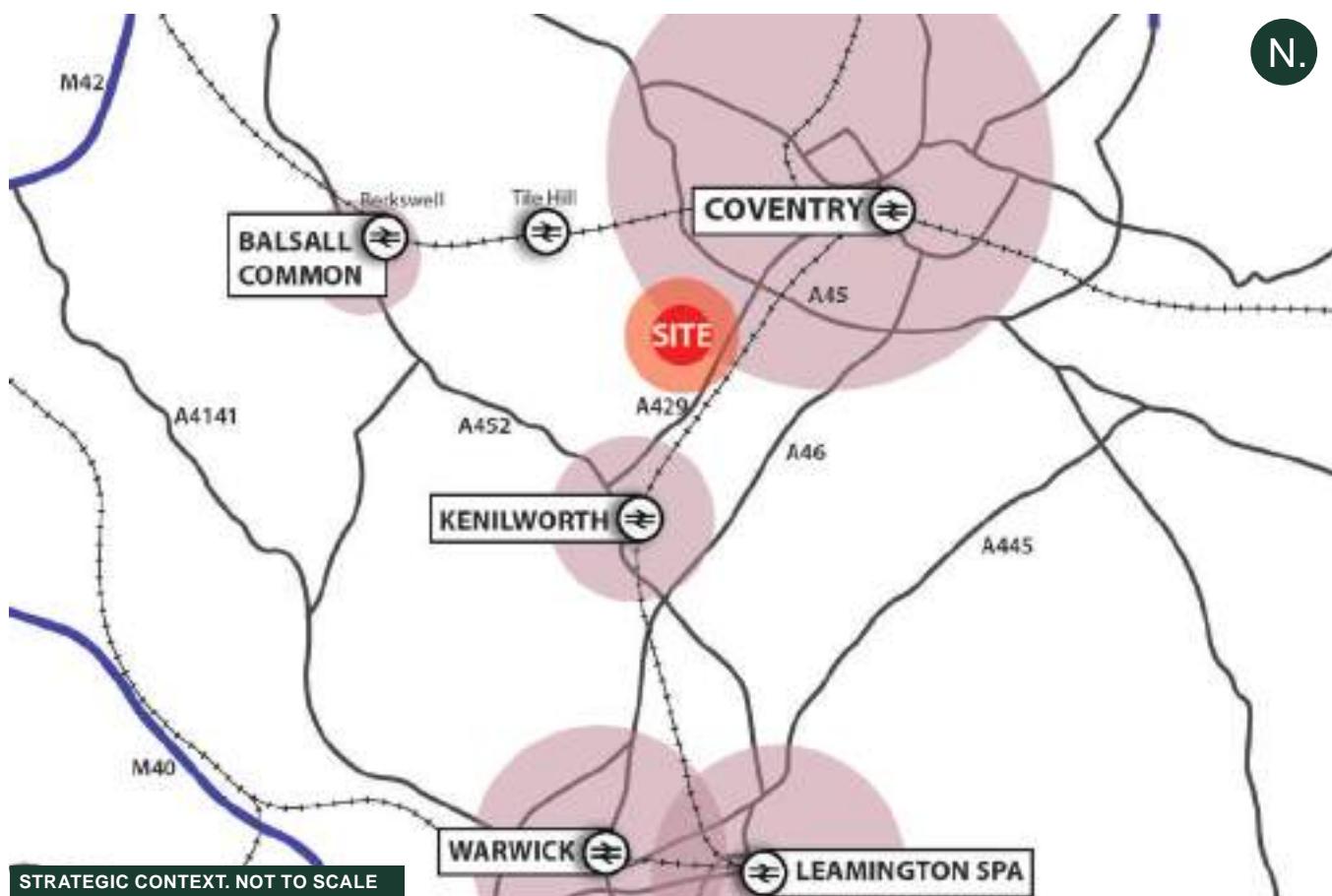
CONTEXT

Located 1.8 miles north of Kenilworth, on the south-western edge of Coventry and to the south-east of The University of Warwick, the site benefits from access to a range of facilities, amenities, employment and leisure and recreation opportunities to sustainably support a new neighbourhood.

THE SITE

Land at Gibbet Hill Road extends to 23.89ha and comprises two arable fields within a single land ownership. The site is bound to the:

- south by hedgerow and scattered tree planting along Cryfield Grange Road, Cryfield Grange Farm and farmland
- east by existing residential housing including planning permission for 22 homes at Land at Cryfield Heights (FUL/2020/1010)
- north by hedgerow, tree planting and Gibbet Hill Road
- west by a watercourse and woodland planting with The University of Warwick's cricket pitches beyond









02

A LOGICAL LOCATION FOR
NEW DEVELOPMENT



A LOGICAL LOCATION FOR NEW DEVELOPMENT

Land at Gibbet Hill Road is strategically positioned as a logical location for new homes.

The site is sustainably located and benefits from excellent access to a wide range of facilities locally within Coventry, all within a 20 minute walk, cycle or bus ride.

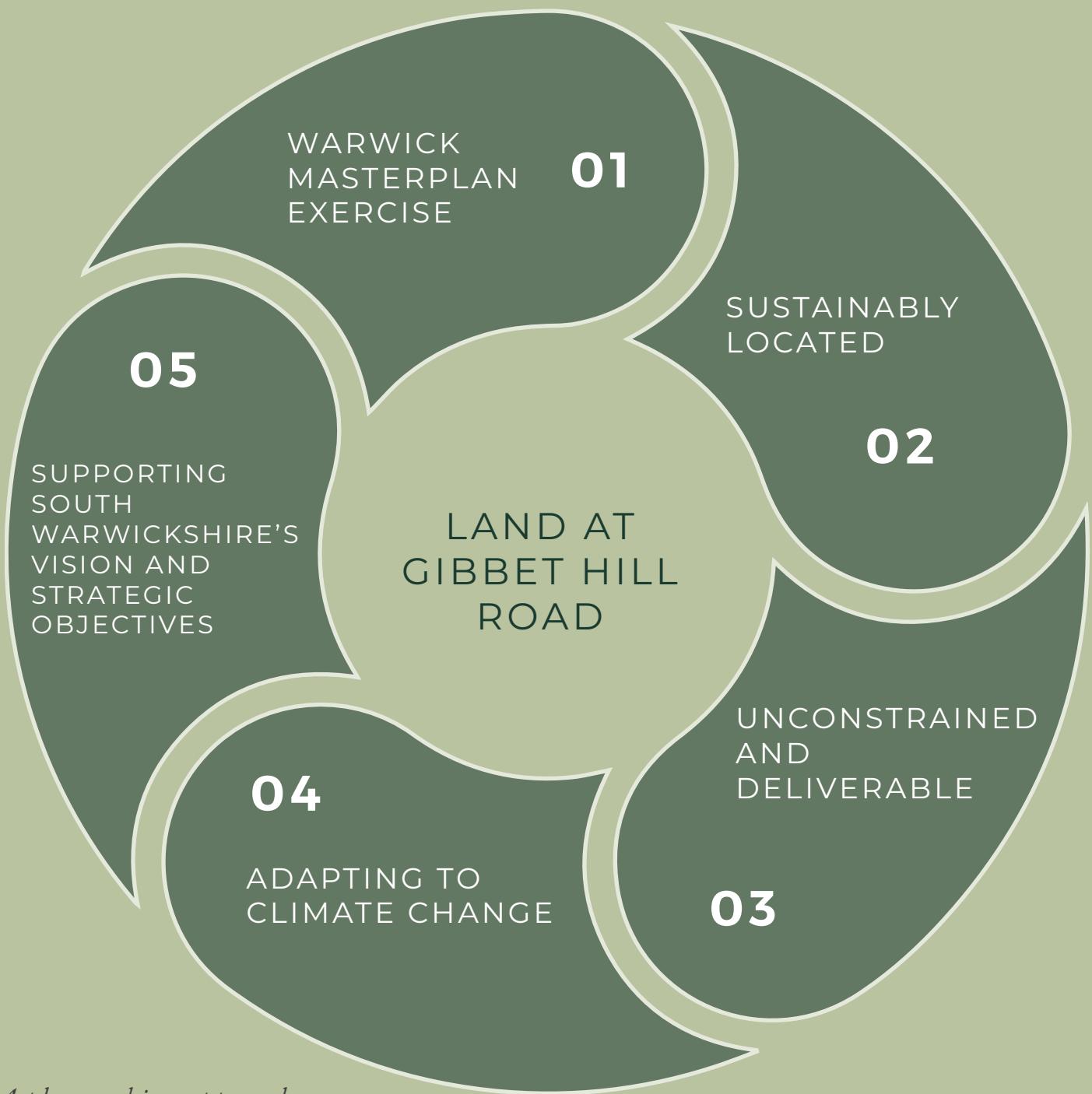
Land at Gibbet Hill Road has few constraints, is deliverable and provides the opportunity for adapting to climate change, thereby helping the Council to achieve its carbon reduction targets.

Five key themes are set out on the right for siting development at this location. Each theme is explored in greater detail throughout this section of the document.

In the following section, the Vision, the document weaves together these five themes to present a well-considered, placemaking-led, and deliverable design proposal that aligns with South Warwickshire's vision and strategic objectives.

The site complements the growth of Coventry and the emerging Warwick masterplan exercise by providing new homes at a sustainable location

The majority of daily needs can be met within a 20 minute walk, cycle or bus ride



A placemaking approach that supports South Warwickshire's vision and strategic objectives

An opportunity to adapt to climate change

There are no insurmountable constraints to development



01 WARWICK MASTERPLAN EXERCISE

Whilst the site has the ability to be delivered independently and within the early stages of the plan period, consideration has been given to the emerging Warwick Master Planning Exercise, the research approach and spatial extent of which is subject to on-going discussion. This is to ensure a flexible approach can be taken.

Warwick District Council are seeking to work collaboratively with three key partner organisations (Coventry City Council, Warwickshire County Council and University of Warwick) and relevant landowners/promoters, to develop a Masterplanning Framework for the area to the south of Coventry.

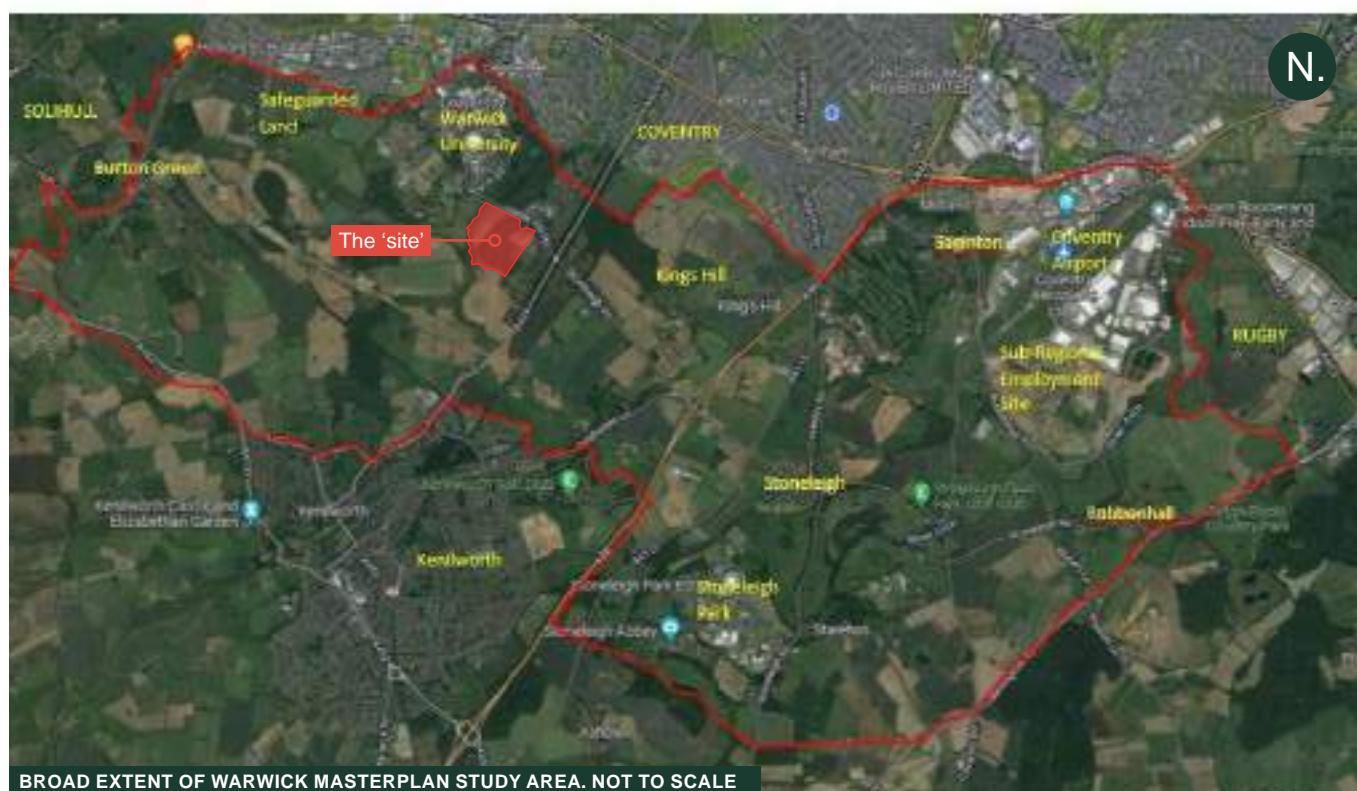
Expressions of support have been received from all organisations and discussions regarding scope of the exercise are progressing. The Framework was presented at the Warwick District Council Cabinet meeting on 20th April 2022.

A Project Board would be created within the aim to understand opportunities and challenges in the defined area and use this to inform development of a masterplan framework.

The intention of the framework is as follows:

- map and understand planned and emerging development in the area
- explore community benefit of improvement to blue/green infrastructure and connectivity
- assist partner organisations in preparing masterplans for specific sites, ensuring these complement planning aspirations for identified area
- understand how declared climate should inform future planning of identified area
- how best to engage with HS2 to maximise benefits it can bring to the identified area
- consideration for travel and transport improvements in the identified area, prioritising active modes
- providing a framework/rationale for future business cases/bids to deliver transport infrastructure

Enable consideration of whether, where and how the area identified may be suitable for further growth as part of the Local Plan





02 SUSTAINABLY LOCATED

Land at Gibbet Hill Road is sustainably located near to Cannon Park, Westwood Business Park and Coventry City Centre and enjoys access to a wide range of facilities.

SUSTAINABILITY AUDIT

The Sustainability Audit is a comprehensive analysis of the site and the wider area encompassing assessment of the site's access to local facilities, landscape and open space and connectivity.

Access to local facilities is fundamental to the concept of locating sustainable development. New development needs a range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over reliance on a private car.



BUILDING FOR A HEALTHY LIFE

Building for a Healthy Life (BHL) is a tool to assess and compare the quality of proposed neighbourhoods. It has been written by Design for Homes in partnership with Homes England, NHS England and NHS Improvement. Whilst BHL is usually awarded to completed schemes, the site selection criteria have been applied to the Land at Gibbet Hill Road to demonstrate the sustainability of the design proposals.

Building for a Healthy Life principles advise places should '**offer social, leisure and recreational opportunities a short walk or cycle from their homes**' and that developments should provide or be near to '**community facilities, such as shops, schools, workplaces, health facilities, co-working spaces, parks, play spaces, cafés and other meeting places that respond to local community needs**'.

The facilities audit on the following pages demonstrates that the Land at Gibbet Hill Road is a sustainable location and fully meets the Building for a Healthy Life principles through existing local facilities and the opportunity to provide facilities missing in the area. Shaping Neighbourhoods, a best practice neighbourhood design guide, also suggests the site scores highly as a sustainable location for neighbourhood extensions.

FACILITIES AUDIT

Figures one, two and three assess the Land at Gibbet Hill Road against the accessibility criteria benchmark for new neighbourhoods established by Shaping Neighbourhoods. **Figure one** demonstrates the ideal distances of local facilities for a sustainable neighbourhood. **Figure two** illustrates how accessible local facilities are from the site today and **Figure three** illustrates the accessibility of local facilities when the site is built out.

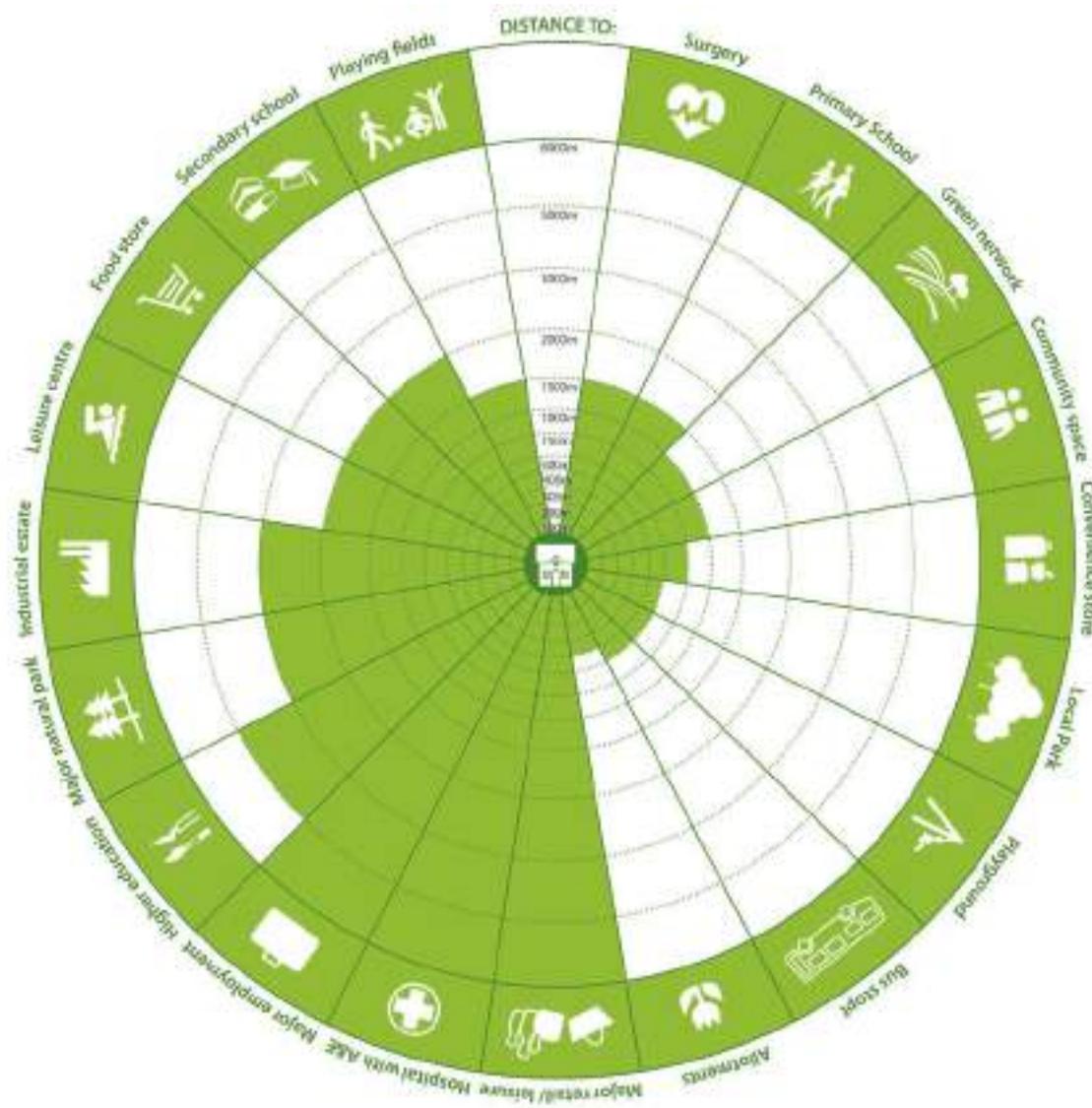


FIGURE ONE: DESIRED

Illustrative ideal accessibility criteria, adapted from
 'Shaping Neighbourhoods, for Local Health and
 Global Sustainability'.

■ Ideal Accessibility



The **'Actual'** (Figure two) facilities audit has highlighted mostly 'ideal' access to the majority of facilities from the Land at Gibbet Hill Road. Access to allotment facilities, playground and local park could be improved through the provision of open space, play and allotment provision provided as part of the proposed scheme.

Figure two demonstrates the site is already a highly sustainable location prior to any development with mostly 'ideal' and some 'good' access to a range of facilities.

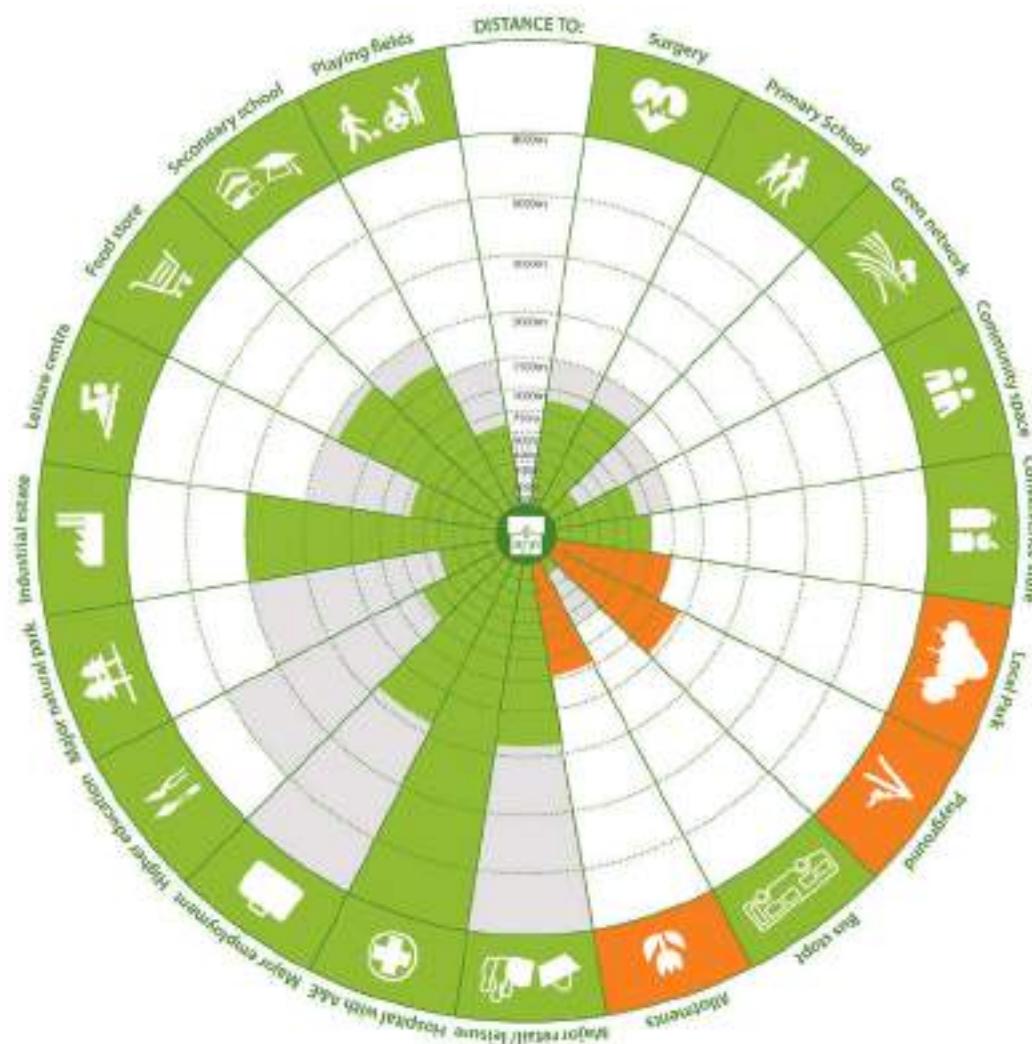


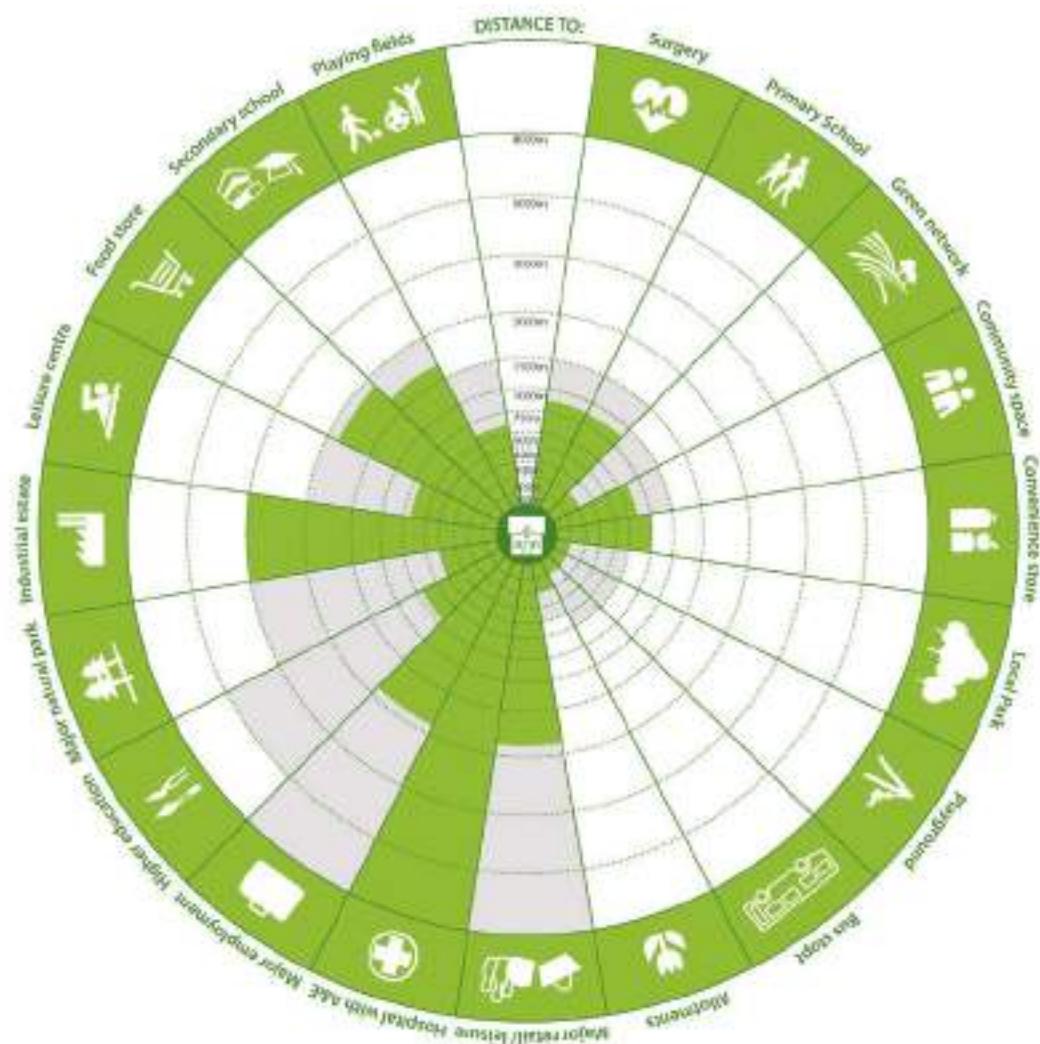
FIGURE TWO: ACTUAL

Illustrative actual accessibility criteria to relevant local facilities from the Land at Gibbet Hill Road, based on walking isochrones

- Ideal Accessibility
- Good Accessibility
- Weak Accessibility

However, **Figure three** illustrates that, once Land at Gibbet Hill Road is built and provides allotments, open space and play access to facilities is even better.

In summary, the Land at Gibbet Hill Road is a sustainable choice for new development and exceeds expectations of access to facilities as identified by 'Shaping Neighbourhoods': a best practice design guide for new neighbourhoods' when fully built out.





FACILITIES

Land at Gibbet Hill Road shares many characteristics of a 20-minute neighbourhood site.

20-minute neighbourhoods are designed to be complete, compact, and connected neighbourhoods where residents can access their daily needs within a short walk, cycle, or ride on public transport. The facilities plan provided opposite demonstrates that the site is located in a sustainable location. It has a strong connection with the University of Warwick and the Cannon Park area of Coventry, which offer a wide range of facilities such as employment, healthcare, and recreational opportunities, all accessible within a 20-minute walk or a short bike or bus ride. Additionally, Coventry City Centre is reachable within a 20 minute cycle ride.

Land at Gibbet Hill Road therefore fully meets the BHL principles identified and the criteria for creating 20-minute neighbourhoods.

FACILITIES WITHIN A 20 MINUTE WALK OR CYCLE:



- Warwick Medical School (2 minutes)
- Tocil Wood and Nature Reserve (2 minutes)
- Cryfield Sports Pavilion (8 minutes)
- University of Warwick (10 minutes)
- Local Convenience Store (10 minutes)
- University of Warwick Health Centre (11 minutes)
- Woodfield Primary School (17 minutes)
- Warwick Campus allotments (12 minutes)
- Sports Hub and Wellness Hub (14 minutes)



- Cannon Park Shopping Centre (6 minutes)
- Cannon Park Primary School (6 minutes)
- Tetbury Park Open Space (6 minutes)
- The Burnt Post Pub (10 minutes)
- Westwood Business Park (10 minutes)
- Canley Ford Nature Reserve (10 minutes)
- Stivichall Primary School (12 minutes)
- Green Lane Medical Centre (12 minutes)
- Bishop Ullathorne Catholic School (13 minutes)







CONNECTIVITY AUDIT

Pedestrian and cycle network

The site is situated near a network of pedestrian and cycle routes, providing good connectivity to various parts of Coventry and the University of Warwick campus. Coventry City Centre is reachable within a 20 minute cycle ride from the site.

Public transport

Coventry Railway Station is located 3.1 miles (a 16-minute cycle) north of the site, providing frequent trains to London Euston in 56 minutes and Birmingham in 21 minutes.

The site is immediately adjacent to a high-frequency bus corridor and so will enjoy an excellent level of public transport provision. Bus route number 12X runs along Gibbet Hill Road, less than 100m from the site, providing access to local facilities and the city centre every 10 minutes. The 11 Platinum runs every 20 minutes from Gibbet Hill Road, offering connections to Kenilworth. Coventry Bus Station, located in the city centre, provides buses to all local areas of the city, as well as Birmingham, Kenilworth, Rugby, and Nuneaton, run by various operators. Links to Warwick can be reached closer to the site from the University Campus using the number X17 and U1.

Road network

The site enjoys excellent access to the local and strategic road network. Gibbet Hill Road connects to the A429, leading directly to Coventry City Centre in the north and Kenilworth to the south. The A429 also connects the site to the A45, providing links to the major retail and employment centre Birmingham. The Warwick Bypass (A46) is a five-minute drive away, connecting to Warwick and Royal Leamington Spa.

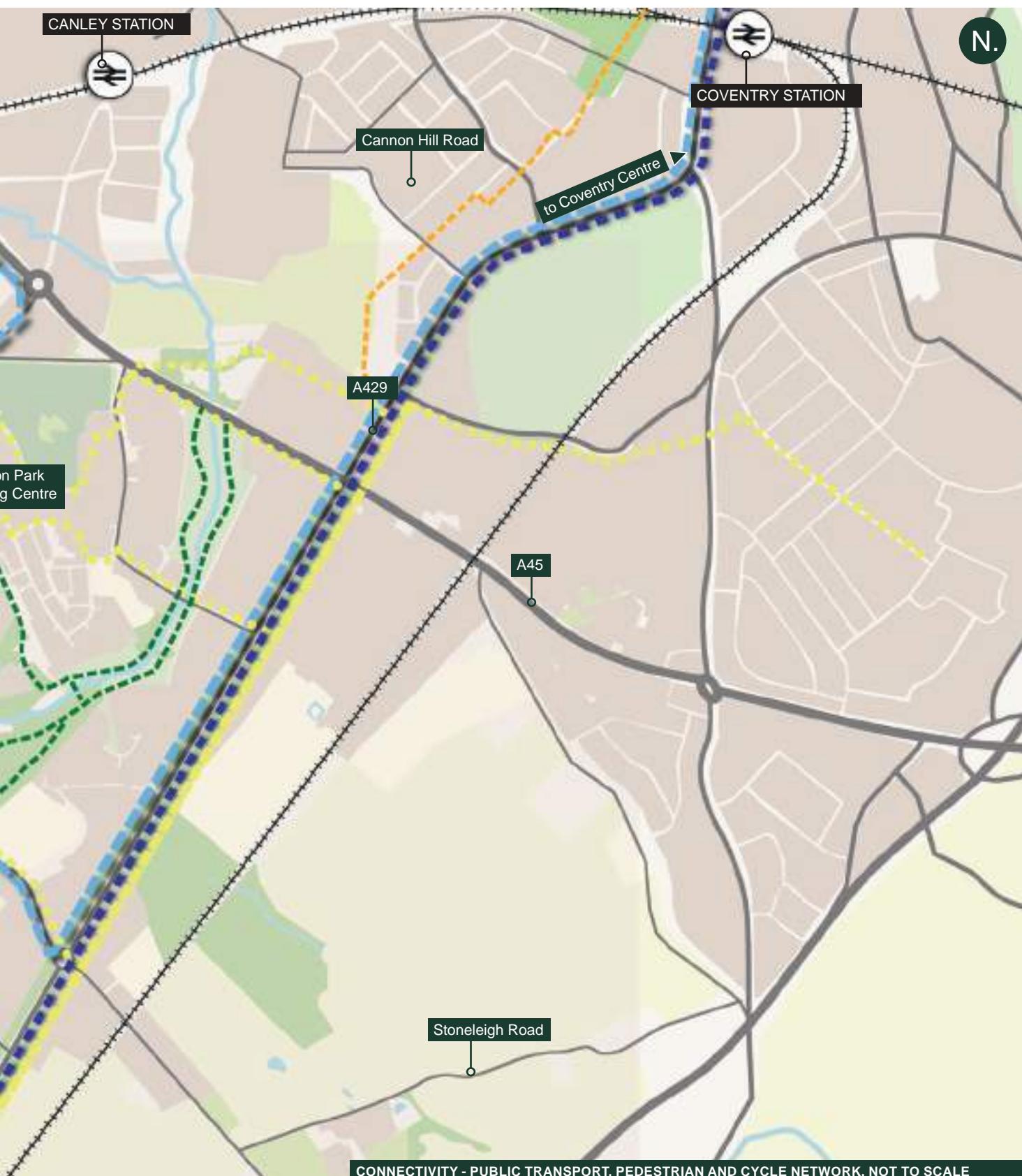


Public rights of way

National cycle route 52

Cycle Coventry route traffic-free

Linking cycle routes



Railway



Railways Station



Bus stop nearest to the site



X17 Bus route, Coventry - Warwick



12X Bus route, Wainbody - St. Michael's



Informal footpath adjacent to site



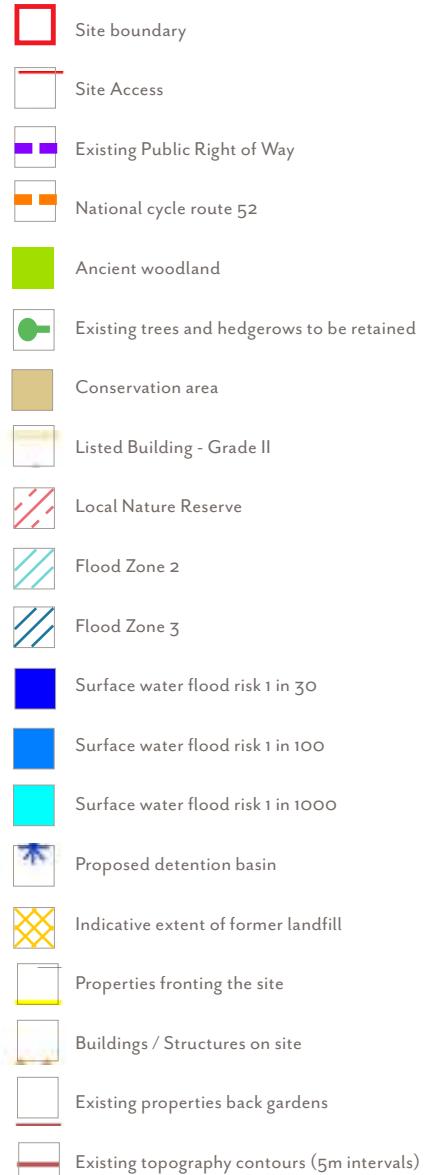
03 UNCONSTRAINED AND DELIVERABLE

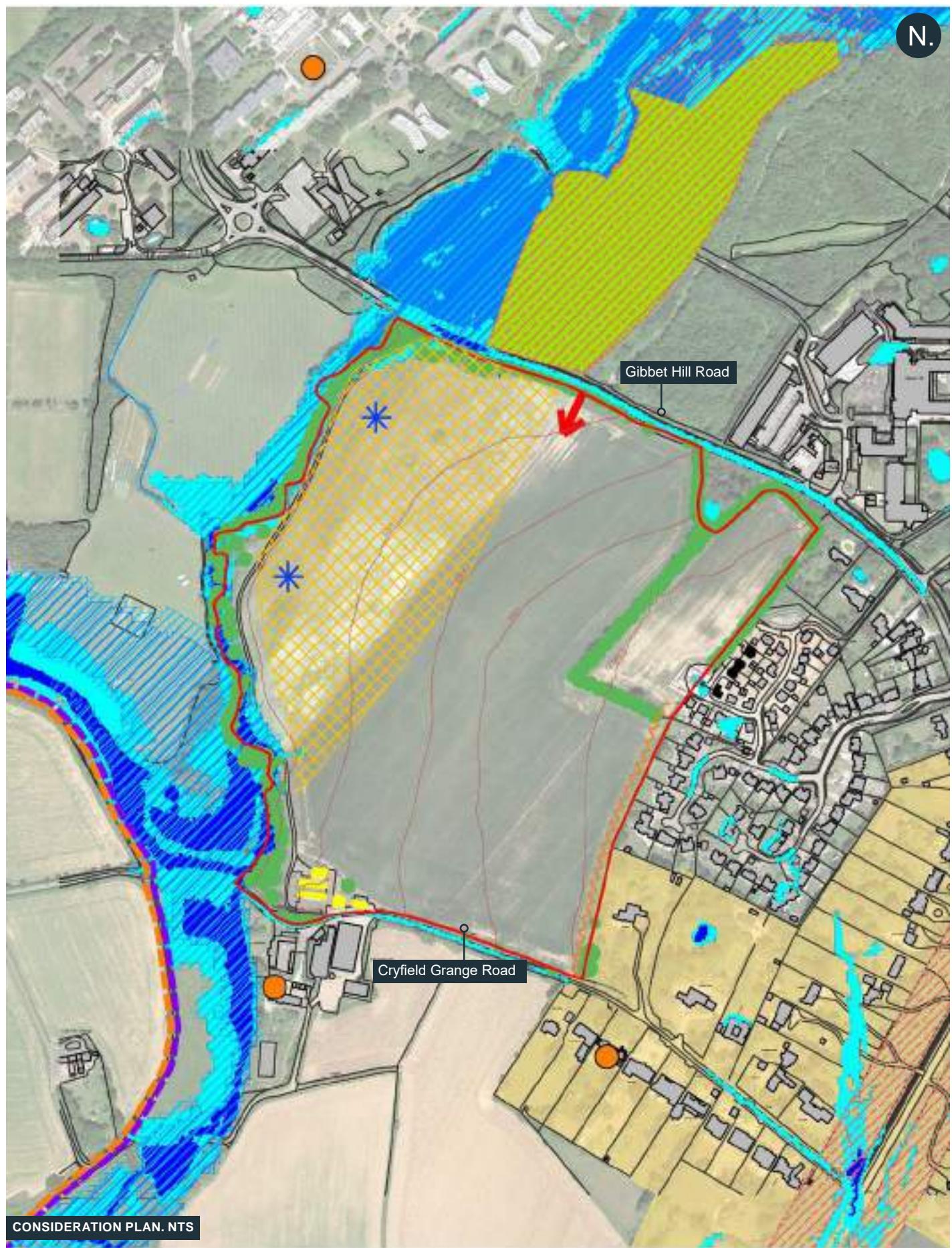
Technical assessments have been undertaken on the Land at Gibbet Hill Road, Coventry, to help shape a positive vision for the site.

The vision involves responding to opportunities and constraints in an informed and considered manner to contribute positively to the local area and create a unique and distinctive addition to Coventry. The plan to the right summarises the findings, and the following pages outline the technical work and reports undertaken to inform this document.

Key considerations include:

- Potential for site access from Gibbet Hill Road.
- Mitigation of existing surface water flood risk through the masterplan layout and proposed sustainable drainage system (SuDS). SuDS basins should generally be situated at the lowest part of the site.
- Retention of existing mature hedgerows and trees with supplementary planting. Development should be set back from these edges outside of any root protection areas.
- Response to the existing settlement pattern of Coventry to create a ‘well rounded’ comprehensively planned and green interface with the countryside.
- Development should respond to existing properties that bound the site, whether they will be fronting or backing on.
- Connection of existing key green infrastructure assets for the benefit of flora and fauna. Creation of linked wildlife corridors connecting with the mature tree belt currently running through the site and creating links with the nature reserves beyond the site boundary.
- Creation of a continuous green route along the western boundary of the site to provide an ecological corridor, maintaining the existing watercourse and creating a ‘naturalistic’ parkland edge.
- Siting of development to work with the prevailing topography.
- Appropriate setting of the Grade II listed buildings adjacent to the site and the existing conservation area.







LANDSCAPE AND VISUAL ASSESSMENT

The Warwickshire Landscape Character Assessment (1993) identifies the majority of the site as being within 'Arden' A broad landscape region, within this there are seven distinct types, the site lies within the 'Arden Parklands' Landscape Character Type. This landscape type defines a relatively large central portion of the overall Arden region, specifically the landscape to the south of Coventry and around Kenilworth. As such the site itself forms a very small section of the wider landscape type, adjacent to the existing southern settlement edge of Coventry. Therefore, reducing the contribution and relevance to the site is considered limited. However, notable 'Key Characteristics' that are considered relevant to the site, the immediate setting and local landscape include:

- Middle Distance Views enclosed by woodland edge.
- Belts of mature trees associated with estate lands.
- Many ancient woodlands, often with irregular outlines.
- Large country houses set in mature parkland.
- Remnant deer parks with ancient pollard oaks.
- Thick roadside hedgerows, often with bracken.

The existing landscape character and visual amenity and the interrelationship with the surrounding area is strongly influenced by the existing landform, vegetation cover and settlement edge location. The higher ground, settlement edge set within a wooded setting to the east are the most visible within the local landscape, with views out from the site taking in Warwick University to the north and the gently undulating wooded landscape to the west. At the time of the site visit the landscape to the south was currently undergoing substantial change as a result of HS2 that will run on a north west / south east axis within the local landscape, sitting between Coventry and Kenilworth. The landform within the site falls to the west, where it forms part of a shallow valley, with a watercourse defining the western site boundary, and associated waterbody forming a local wildlife area.

Site Landscape & Visual Evaluation

The landform within the site slopes east to west, from a high point at approximately 97m Above Ordnance Datum (AOD) midway along the eastern boundary, which is defined by the rear of existing residential development. The site falls to a low point at approximately 74m AOD along the western boundary which is defined by an existing watercourse. The surrounding landform is undulating with a series of small hills and ridges with the site forming the eastern slopes of a shallow localised valley within which are numerous streams. There are also a number of notable waterbodies within proximity to the site to include those to the north west within the Tocil Nature Reserve, north of Gibbet Hill Road. The water course which defines the western boundary of the site runs south from Tocil nature reserve, past the site, where north of Crackley, a suburb of Kenilworth, it heads south east and connects to Finham brook and then into the River Avon which lies further to the east.

The topography and hydrology have in part dictated the settlement pattern and land use in this area. Development has expanded south from Coventry, along the A429 / Kenilworth Road, with historic mapping illustrating the wooded character of the route that remains today. Existing residential development, formed for the majority of large, detached properties, is located in and around the wooded setting of Kenilworth Road. Vegetation defines the settlement edge to Coventry, with the settlement edge extending further south than the site itself. Warwick university campus lies to the north with the views over the main campus visible from the higher ground within the site. The existing railway line between Kenilworth and Coventry runs on a north east / south west axis to the east of the A429. At the time of the site visit work has begun on the section of HS2 which runs through the immediate setting to the south, where it cuts through the arable and wooded landscape.

Land use in the local and wider context towards the southeast and southwest is generally agricultural fields, within which are a number of notable woodland blocks some of which are local nature reserve. These features are divided by the local road network, including major A roads such as the Warwick Bypass. There are typical land uses associated with the edge of settlement recreational activities with a number of golf courses breaking up the pattern of agricultural fields and woodlands.

The site itself is formed of two agricultural fields, a small linear field forming the north eastern part of the site, this is separated from the wider site by an L shaped mature hedgerow with hedgerow trees, that provides a good level of enclosure to this elevated part of the site the adjacent existing settlement edge. The wider site is a large arable field with only a single internal mature tree located within the north western corner. Mature vegetation aligns the watercourse that defines the western boundary, the tree cover / woodland extends further east, forming part of a local wildlife area, within which lies a small pond.

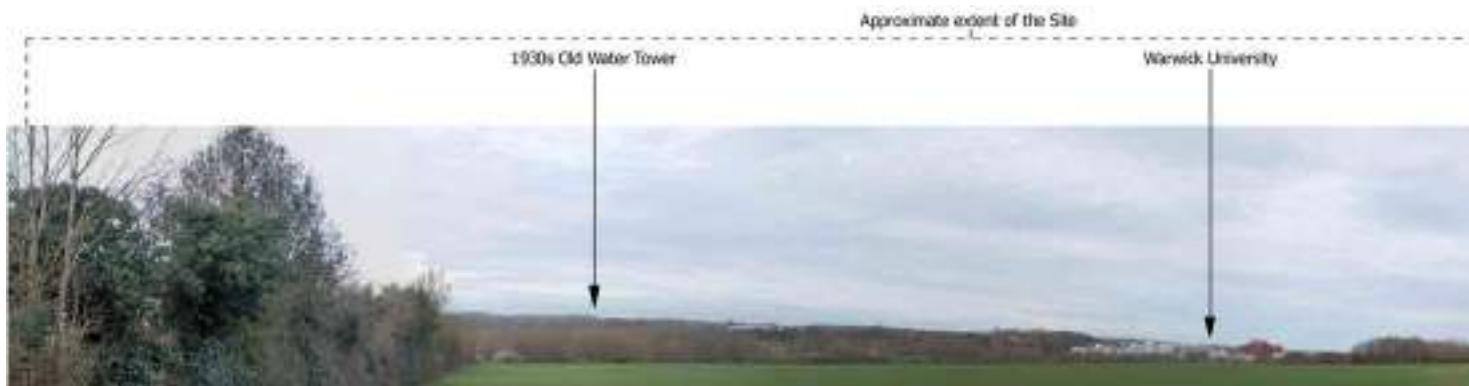
In the immediate vicinity of the site, the vegetation pattern comprises small to large irregular shaped agricultural fields bound by mature hedgerow with hedgerow trees to the south east and west of the site. Within the locality there are a number of notable

woodland blocks, to the north lies Tocil Wood, that is ancient woodland, part of Tocil Wood Nature Reserve. There are linear tree belts along the A429 to the east of the site that constitute part of the Wainbody Wood and Stivichall Common Kenilworth Road Spinney Nature Reserve, which includes a further area of ancient woodland to the East.

There are no Public Rights of Way (PRoW) within the site. However, within the local area to the west and south west there are a number of PRoW, which includes Coventry Way long distance route. The closest of which being PRoW 273/W164/1 that stretches 2.7km from the university of Warwick southbound to the town of Crackley.



Site boundary	Listed buildings	Potential green links through the site
Existing woodlands, coppices, tree belts	Green belt	Existing sensitive settlement edge
Contours / spot heights	Flood Zone 2	Blue / green enhancement zones
Public rights of way	Flood Zone 3	Green buffer
Cycle route	Key long/medium distance views	



NORTH EAST CORNER OF THE SITE, LOOKING SOUTH WEST



NORTH OF THE SITE AT THE L SHAPED TREE BELT, LOOKING SOUTH



GIBBET HILL ROAD LOOKING SOUTH ACROSS THE SITE.



PROW 273/W164/1 LOOKING NORTH EAST ACROSS THE SITE.



ent of the Site





FLOOD RISK AND DRAINAGE

Flood Risk

The site has been appraised for sources of flood risk including fluvial, surface water, groundwater, sewers and man-made structures. The key sources of flood risk to the proposed development have been narrowed down to surface water and fluvial flood risk.

Canley Brook passes under Gibbet Hill Road before flowing alongside the western boundary of the site. Canley Brook flows in a north to south direction to its confluence with Finham Brook approximately 1.8km south of the site.

EA flood mapping indicates the site to be mostly in Flood Zone 1 (low risk). However, areas along the western boundary along Canley Brook are in Flood Zone 2 (medium risk) and Flood Zone 3 (high risk). In accordance with The NPPF's guidance on Flood Risk Vulnerability and Flood Zone Compatibility, areas located in Flood Zone 1 are considered to be appropriate for locating all types of land use. Development in Flood Zones 2 and 3 should be avoided.

Long term flood risk from surface water at the site indicate the site to be at very low risk of surface water flooding. However, the area along the western boundary near the Canley Brook shows areas of low to high risk of surface water flooding.

All other sources of flooding have been assessed and are considered to present low risk.

It is anticipated that the development will employ a range of sustainable drainage techniques within the layout to delay, convey and treat surface water runoff whilst managing flows to ensure no increase in flood risk post-development. The use of SuDs techniques aims to promote the four pillars of benefits comprising water quality, water quantity, amenity and biodiversity.

Surface Water Drainage

Site topography shows ground levels falling steadily from east to west towards the Canley Brook.

BGS geology mapping indicate bedrock geology of the site to be clays of the Tile Hill Formation with occasional sand and sandstone of the Kenilworth Sandstone Formation. It is anticipated the clays of Tile Hill Formation has limited permeability with the possibility of some infiltration potential within the Kenilworth Sandstone Formation.

A historic landfill is located in the west of the site. Preliminary site investigations indicate the made ground here is inert non-hazardous material.

From the topography of the site, existing natural surface water runoff is expected to flow overland to Canley Brook in the west.

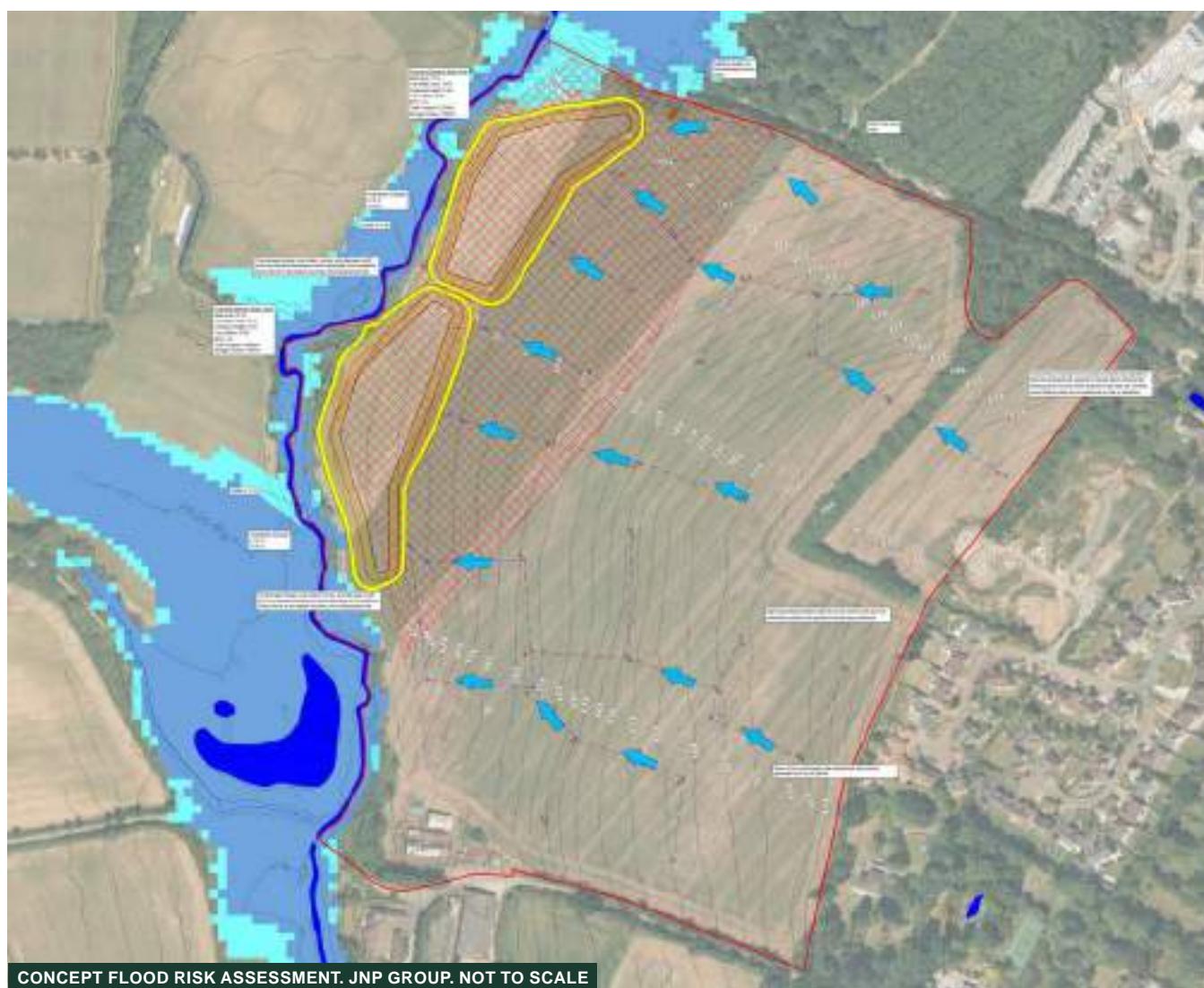
In accordance with the Non-Statutory Technical Standards For Sustainable Drainage, surface water for new developments will be managed by control of peak flow and volume runoff. Surface water runoff will be limited to pre-development Greenfield runoff rates with onsite attenuation to include allowances for climate change. Detention basins will be incorporated into the site layout in the low-lying western area of the site. Given that these basins will be located within the area of the historic land fill, excavation will be minimised and the basins will be lined to prevent ingress or egress of water into / out of the land fill.

A source control SuDs management train is also to be considered in upstream areas of the detention basins to create green / blue corridors and on-plot SuDs, typically comprising swales and permeable pavements. Should detailed ground investigation confirm the suitability of the underlying soils to accept surface water runoff, infiltration systems will be considered.

Foul Water Drainage

The nearest public foul sewer is located along Gibbet Hill/Morreal Meadows approximately 125m northeast of the site. Given the low-lying nature of the site relative to this sewer, a pumped solution will be required for connection.

Severn Trent Water has advised through initial consultations that due to surcharge levels and expected additional flows, additional investigation and modelling will be required to understand the impact on the network. Any necessary sewer upgrade works will be undertaken by STW through Infrastructure Charges.



	Indicative site boundary		Existing ground contours
	Flood Zone 2		Existing watercourse/river/waterbody
	Flood Zone 3		Proposed surface water sewer
	Overland flow direction routed within site roads		Proposed foul water sewer
	Detention Basin (Indicative Layout) (0.2m Intervals)		Proposed rising main
			Existing landfill extents



GROUND CONDITIONS

Wardell Armstrong attended site in October 2022 to supervise a trial pitting investigation to establish the shallow ground conditions and material types in the historic landfill area across the west of the site. Subsequent laboratory testing was undertaken on a number of samples retrieved from the site within the natural strata and landfill made ground materials which was assessed for any contamination.

Based on the site visit, aerial photography and street level photography available online, the site appears to generally fall from east to west/southwest. The site forms a large agricultural field currently used for arable farming.

The assessment of the geology of the site is based on the British Geological Survey (BGS) GeolIndex mapping data and from the intrusive ground investigation. The published mapping indicates that a small area in the west of the site is overlain by superficial deposits comprising Alluvium, associated with the stream to the west of the site. These deposits are recorded to consist of clay, silt, sand and gravel. There are no superficial deposits recorded over the remainder of the site. The site is underlain by the Kenilworth Sandstone Formation, the Gibbet Hill Conglomerate Bed and the Tile Hill Mudstone Formation.

The 2022 site investigation within the historical landfill area, recorded the material to comprise generally of topsoil underlain by made ground overlying natural clay strata of the Tile Hill Formation and occasionally sand and sandstone of the Kenilworth Sandstone Formation. The made ground is considered to be the material deposited in the landfill and was recorded as inert, non-hazardous material associated with construction/building sites.

No Environmental Permits of concern have been identified on site or in proximity to the property. No entries on the Local Authority's Contaminated Land Register have been identified within 250m of the site.

Historic Landfill Assessment

A historic landfill is recorded in the west of the site. Searches and requests for information have been undertaken. The Environment Agency (EA) outlines the landfill to have been operated under two separate references throughout its life: EAHL28553 and EAHL35547 and was recorded as Cryfield Grange. The license information that is available records the waste type allowed was inert and a license was given to Urbangrand Limited. It is likely that inert waste from construction sites in the local area was deposited in the licensed landfill at the site.

The site investigation comprised a series of trial pits within the area suspected to form the former landfill, which according to Environment Agency records was operational in the western part of the site between 1987 and 1993. The site investigation considered the type of material and contamination risk of the made ground in this former landfill.

Based on this site investigation the historic landfill accepted inert, non-hazardous material such as construction site rubble and brick. Observations during the investigation, and subsequent testing of the recovered samples did not record any widespread elevated contaminant concentrations; a single sample contained a slightly elevated concentration of lead, however this was recorded several metres below ground level and it is considered that there are no potential associated exposure pathways. Testing of samples deeper than this also indicated no levels of contamination showing that this is not impacting on the natural materials below.

No evidence of harmful or combustible gases was found during the investigation, and the non-hazardous, inert nature of the materials strongly indicates that gassing will not be a constraint.

Moving forward further site investigation will be undertaken, for example to inform foundation design should the former landfill remain in situ, along with further gas monitoring. Whilst indications at this stage are that the landfill can remain in situ, the material could be excavated and disposed of off-site if required.

Based on the information reviewed and the site investigation the current and historical use of the site is not considered to represent a significant risk to the environment and the site is suitable for the proposed end use of residential or commercial development.



- Trial Pit Locations
- Red Line Boundary
- ☒ Landfill Boundary



ECOLOGICAL ASSESSMENT

BWB Consulting undertook a Preliminary Ecological Appraisal at the site in February 2023, comprising a site survey and a desk study.

Habitats

The site was found to be of low ecological value overall, given the dominance of arable crop and the minimal margins and the loss of these habitats to facilitate development would not be a significant ecological constraint.

Although the site-wide hedgerows and the tree planting towards the north-east of the site represent habitats of higher ecological value the site offers opportunity for these habitats to be retained within the layout to provide green space within the scheme and overall significant impacts to habitats at the site as a consequence of development would be unlikely. Similarly, off-site habitats of high ecological value, including Tocil Woods to the north, will not be directly affected and connectivity of habitats along the western and northern boundaries can be designed into the scheme. A well-designed landscaping scheme would offer opportunities to achieve a net gain on the site, through the use of native species, wildflower grassland, waterbodies and tree/scrub planting. Early collaboration between the landscape architect and the ecologist would ensure the opportunities for net gain on the site were maximised, whilst also ensuring compliance with other policy/guidance, such as Green Infrastructure and Public Open Space.

Protected Species

The site offered potential for badger, bats, nesting birds, great crested newts and riparian mammals and some further survey work for protected/notable species would be required to inform any specific mitigation. However, given the prevalence of arable crop, significant populations of such species were considered extremely unlikely and significant ecological constraints were not anticipated.

Mitigation for any species potentially present could include provision of green infrastructure, such as grassland, trees, hedges and scrub, a sensitive lighting scheme following good practice guidelines, presence of an Ecological Clerk of Works and sensitive clearance of certain habitats (depending on further survey findings).

Designated Sites

The site lies adjacent to Tocil Wood Local Nature Reserve/Local Wildlife Site and within the SSSI Risk Zone for Tilehill Wood SSSI. General good practice guidance will need to be adhered to in order to ensure these sites are not adversely affected by the proposals. However, retention of habitat connectivity and the retention of boundary habitats will serve to buffer the impacts from any future development of this site.



	Site boundary (237,688m ²)
	e1 - Arable and horticulture (211,988m ²)
	g4 - Modified grassland (9,281m ²)
	h3 - Dense scrub (255m ²)
	h3d - Bramble scrub (1,082m ²)
	q1b5 - Buildings (826m ²)
	w1g7 - Other broadleaved woodland types (14,144m ²)

	19 - Ponds (Priority Habitat) (51m ²)
	73 - Bare ground (219m ²)
	w1g6 - Line of trees (40m)
	h2a - Hedgerow (priority) (1,177m)
	q1b6 - Fence (205m)
	11 - Scattered trees



TRANSPORT STRATEGY

Pedestrian / Cycle Access

Within the scheme, pedestrian and cycle routes will be integral to the overall access layout and will include off-line recreational routes to optimise site permeability and accessibility.

In terms of wider access, the site is situated within proximity of a well-established and comprehensive footway/cycleway and Public Right of Way network. To integrate the site with the surrounding provision, footways would be introduced along the southern side of Gibbet Hill Road, within the site frontage. These would connect the principal points of access with the existing westbound bus stop and the existing signal-controlled crossing, which in turn would afford access onto the existing footway network. Dropped kerb crossings with tactile paving would also be afforded on all arms of the site access junction and at all junctions within the site to promote accessibility.

There is also an opportunity to provide a pedestrian / cycle connection onto the 'Connect2 Kenilworth' route to the west, and a pedestrian / cycle connection from the southern boundary onto Cryfield Grange Road. These connections would afford onward travel towards Coventry, Kenilworth, local services and facilities, including nearby schools, and through the University of Warwick campus.

Public Transport Access

There are two bus stops on Gibbet Hill Road, which benefit from well established, comprehensive bus services, affording access to key local destinations including Coventry (17-minute journey time), Leamington Spa (20-minute journey time), Kenilworth (9-minute journey time) and Warwick (47-minute journey time).

As part of the development proposals, the westbound bus stop on Gibbet Hill Road could be upgraded to align with the existing eastbound bus stop, by affording a shelter, timetable and seating.

As well bus services, the site is situated within proximity of frequent and reliable rail services, which provide access to a number of local and national destinations via Kenilworth, Canley and Coventry railway stations. Destinations include Leamington Spa, Birmingham, Manchester and London. The nearby railway stations can be accessed by bicycle or by one of the local connecting bus services.

Vehicular Access

A review of the opportunities to provide vehicular access to the site from Gibbet Hill Road has been undertaken, which demonstrates that there are a number of options to provide two points of access to the site that are technically compliant and deliverable within land forming the site or the adopted highway. Options including two priority junctions, or a four-arm roundabout providing two points of access to the site, have been explored, with the preferred option at this stage discussed further below. The strategy may evolve as proposals for the site develop further.

Gibbet Hill Road is a wide all-purpose carriageway, which is contiguous with the site's northern boundary. There is sufficient frontage available to accommodate a roundabout access to serve a development of this scale in a safe and effective manner to meet the required design criteria, and as such this has been selected as the preferred option.

Given that Gibbet Hill Road is subject to a 40mph speed limit, the design accords with the criteria outlined within the DMRB CD 116 guidance document. The junction would afford two arms into the site to ensure Warwickshire County Council's guidance on access requirements for developments exceeding a quantum of 200 dwellings is achieved. A preliminary design in support of the proposed site has been prepared to demonstrate deliverability within the confines of the public highway and the site.

Summary

The site can be integrated with the existing pedestrian and cycle infrastructure, which affords a high quality, comprehensive network that links the site with several local services, facilities, recreational areas and local centres.

The site is situated within a 5-minute walk of existing bus services, which serve the immediate and wider area. The close proximity and well-connected bus services would allow for future site occupiers to commute efficiently and more sustainably towards Coventry, Kenilworth and Leamington Spa, as well Birmingham.

Access to three well-connected rail stations within 5km would afford future site occupants with onwards travel to several key local and regional destinations, including Leamington Spa, Birmingham, Manchester and London.

A compliant site access junction can be achieved within the confines of the highway boundary and the site, which accords with DMRB and WCC highway design guidance.



INDICATIVE ACCESS ARRANGEMENT. TTC. NOT TO SCALE



HERITAGE

Designated Heritage Assets

Situated within the study area are a number of designated heritage assets including various grade II listed buildings. Located on the southern boundary of the site is Cryfield Grange (1035614) whose origins date back the mid-16th century, with accounts referring it being the demense farm of Henry II. The asset is in partly shielded by intervening buildings on its north side dense vegetation including a small linear plantation of leylandii. Despite this there are partial views to it from the site.

Located immediately to the south of the site is the Kenilworth Road, Conservation Area which was laid out after the first World War. The boundary runs along part of the south eastern edge of the site. Views to and from the Conservation are in part restricted by tree cover with only fleeting views of the buildings contained within it. It is also noted that there is modern infill along part of its northern edge which will affect significance within setting. The other designated heritage assets in the landscape are set within an urban/ semi urban environment whose setting has already been affected by modern built form.

To limit any harm to the setting of the Grade II listed Cryfield Grange and the Kenilworth Conservation Area, it is recommended that both the southern boundary and a small part of the eastern boundary are strengthened with planting to reduce any impact on setting. Other measures to limit any harm could include the provision of low density housing in the sensitive area or a landscape buffer.

Non-designated Heritage Assets

The Historic Environments Record (HER) has recorded a number of non-designated heritage assets within the site and the study area which range in date from the early lower Palaeolithic to the modern period, with the majority of these recorded to the south and south west of the site.

It is purported that a Bronze Age Axe was found in the site, although descriptive records place this in Green Lane some distance to the east (MCT135). Prehistoric activity is also recorded on the southern edge of the site with the recovery of a Neolithic/ Bronze Age hammerstone (MWA2890). Further artefacts dating to the Neolithic/ Bronze Age were found to the southwest and southeast of this respectively (MCT127, MWA8353). Recorded to the northwest of these artefacts are several enclosures (MWA2926) of unknown date which are visible as cropmarks on aerial photographs. Recorded on the edge of the site is the possible site of a Medieval grange (MWA2852); an outlying farm, which belonged to Stoneleigh Abbey.

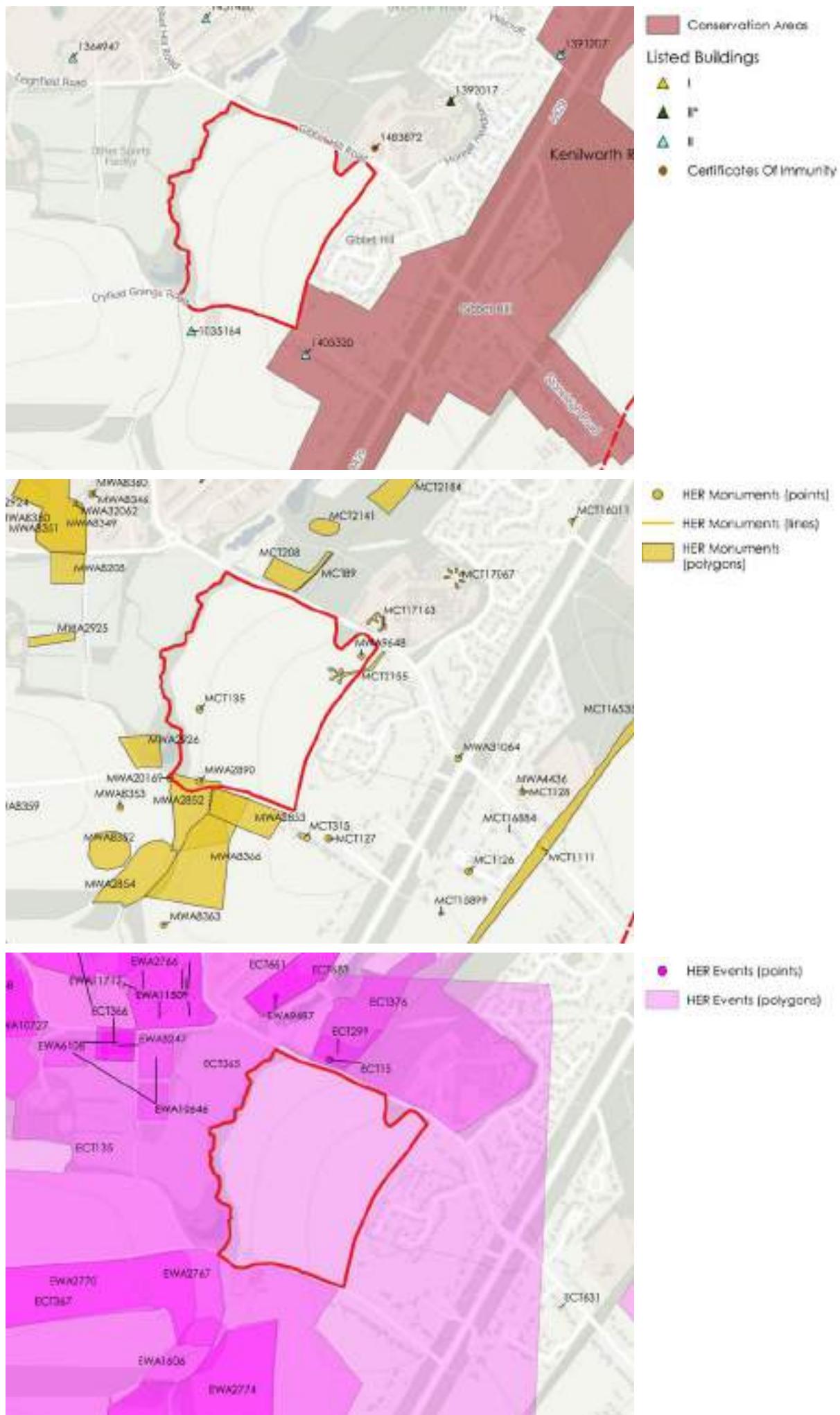
Later activity in this locality is also evident with the record of a building possibly dating to the Post Medieval period (MWA8352). On the edge of the medieval/ post-medieval complex is a watermill (2854) which is referred to as a fulling mill in 1535. Adjacent to this is the site of a former brick works (MWA8366) which dates to the 19th / 20th century.

Recorded immediately to the north of the site are wood banks (MWA89) which run along three edges of Tocil Wood. The wood is depicted on a 1597 estate map and the banks may, therefore, date back to the 16th century. To the east of this is Gibbet Hill Farmhouse which has its origins in the 17th century (MCT17163), with some fabric from this date surviving. The farmhouse was altered in the 18th and 19th centuries.

Evident within the northeastern corner of the site is the possible site of a Second World War ammunition stand (MCT2155) which is visible as a cropmark on aerial photographs. Adjacent to this is the site of a World War II heavy anti aircraft installation (MWA9648).

Based on the evidence recorded there is potential for archaeological remains of a Prehistoric date to extend into the western part of the site from the west. Similarly, it is considered likely that features associated with the Medieval settlement will extend into the site given the evidence recorded on the southern boundary.

Placement of any open space or area for biodiversity net gain along the site's southern boundary area would mitigate against the risk of encountering of archaeological remains and / or deposits in this area.





04 ADAPTING TO CLIMATE CHANGE

Land at Gibbet Hill Road should strive for best practice, innovation, and sustainability standards to adapt to climate change.

CLIMATE EMERGENCY

Warwick District Council has, along with many other councils in the UK, declared that there is a current and future climate change emergency that requires urgent planning and action. Warwick District Council seeks to achieve a carbon-neutral district by 2030.

THE PROPOSALS

Sustainability responsibilities will be put at the forefront of the proposals. A variety of measures can be taken to address sustainability.

Firstly, the site has embedded holistic **Social and Economic** site-wide strategies that embrace sustainable lifestyles such as walking, cycling and greening the public realm into the proposals.

Secondly, the design includes site-wide **Environmental Protection and Enhancement** solutions to mitigate the effects of climate change – such as sustainable urban drainage systems, woodland planting and habitat creation.

Thirdly, the approach to sustainable energy production, **Mitigating and Adapting to Climate Change**, is reflected in individual plots and homes through energy reduction technologies.



Energy and Carbon Management

The energy strategy for the proposals will follow the Energy Hierarchy; that is to reduce energy demands, provide energy efficiently and incorporate renewable and low carbon technologies.

Energy demand reduction measures currently available that could be incorporated subject to further design, technical and cost implications include:

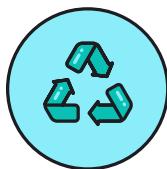
- Passive solar design measures that optimise heat losses and gains and maximise natural light penetration.
- Natural ventilation, solar shading, living walls and green/brown roofs to prevent overheating and reduce cooling demand.
- New and emerging technology, including heat recovery from waste heat and façade design as well as using insulation, heat recovery and low energy systems.
- Winter gardens can be used to provide thermal buffering for fabric, allow daylight penetration and allow the use of natural ventilation strategies.
- Construction details to be carefully considered to ensure thermal bridging and air permeability is minimised in line with future building standards.



Water resources and flood risk

The proposals would protect the quality and quantity of water resources and minimise water consumption. Options we would explore include:

- Developing a sustainable water strategy for the site which includes both rainwater and greywater recycling.
- Residential dwellings to include water saving devices.
- Introduction of Sustainable Urban Drainage Systems.
- The most appropriate way to manage surface water runoff is through the use of Sustainable Drainage Systems which aim to mimic the drainage of green field sites by:
- Reducing the quantity of runoff from the site (source control techniques).
- Slowing the velocity of runoff to allow settlement, filtering and infiltration (permeable conveyance), and
- Providing passive treatment to collect surface water before discharge into land or to a watercourse (end of pipe system).

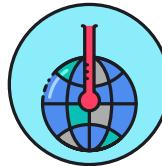


Materials and resources

We would explore the options for using sustainable materials and aim to minimise resource use.

The selection of materials and components should also consider performance over their design life and their environmental impact, with reference to the BRE's Green Guide to specification. For example, timber products could be obtained from sustainable sources (FSC or equivalent accredited sources). The use of locally and ethically sourced materials would be investigated and utilised where possible.

We would explore earthworks on-site and aim for a cut and fill balance. All materials excavated will be reused on-site or locally where possible.



Climate change adaption

The proposals will be designed to adapt to future climate change including hotter dryer summers, wetter warmer winters as well as more extreme cycles of flooding and drought.

The masterplan design shall have consideration to the following, subject to further design, technical and cost implications:

- Orientation of buildings and streets to reduce excessive solar gain and catch breezes.
- The use of green infrastructure, greenspace and bluespace, developed as part of a masterplan and landscape framework, to minimise the urban heat island effect, provide shading and places of refuge and promote evaporative cooling.
- The use of shading to reduce excessive solar gain (e.g., through narrow streets, canopies of street trees, façade design and advanced glazing systems). Efforts to maximise shade in summer will need to take account of the need for light and warmth in winter.
- Passive ventilation through orientation and morphology of buildings and streets.
- Efforts to catch breezes and increase canyon ventilation paths must also consider the need for winter warmth.
- Flood risk management measures and drainage strategies shall take into account increased rainfall events and flooding as a result of climate change.
- Designing drainage systems and water consumption for buildings and landscape with consideration to increased drought conditions and water restrictions.



05 SUPPORTING SOUTH WARWICKSHIRE'S VISION AND OVERARCHING PRINCIPLES

South Warwickshire's Issues and Options Consultation document sets out an overall vision for the district area alongside five overarching principles. Sustainability and climate change mitigation is a key theme throughout.

The following pages explore how Land at Gibbet Hill Road helps to deliver and add value to the five overarching principles of South Warwickshire's vision. Our proposals will also look to incorporate these to help to achieve a proposal South Warwickshire can be proud of.



A CLIMATE RESILIENT AND NET ZERO CARBON SOUTH WARWICKSHIRE

Adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development

Response: A variety of measures can be taken to address sustainability. As mentioned on pages 48-49 the site will undertake a three step approach that will ensure sustainability is at the forefront of the proposals. This includes holistic social and economic site-wide strategies, site-wide environmental protection and enhancement solutions and sustainable energy production through energy reduction technologies.



A WELL-DESIGNED AND BEAUTIFUL SOUTH WARWICKSHIRE

Creating spaces where people want to be, which respect and reflect the existing beauty and heritage of the area

Response: Land at Gibbet Hill Road would seek to create a distinctive neighbourhood of note with high-quality, innovative and beautifully designed homes. The site will create a place that belongs to South Warwickshire by creating a seamless character that sustains the unique character of the district.

Land at Gibbet Hill Road believes housing is the single most important building type in terms of influencing the quality of people's day to day lives. High-quality design and architecture will be key to the project's success, as good design matters to the people of South Warwickshire and provides social and economic value. To create places that delight, the site's collaborative placemaking strategy involves a participatory process that sees the local community at the forefront of the design process through a series of 'hands-on' design events and exhibitions. To ensure high-quality design, the site would also:

- collaborate with the Councils on a vision for the site
- engage with local stakeholders
- explore a design review process with a recognised panel

Land at Gibbet Hill Road could also develop a set of design codes, or rules, in partnership with the local authority, the public and other key stakeholders to ensure an enduring legacy that South Warwickshire can be proud of.



A BIODIVERSE AND ENVIRONMENTALLY RESILIENT SOUTH WARWICKSHIRE

Strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire.

Response: We would protect and enhance the natural environment by embedding green infrastructure and biodiversity gains in designs and layouts, as informed by existing local provision and any identified deficiencies/opportunities. This includes the creation of a significantly sized new green corridor for the benefit of all who live in South Warwickshire. Our proposals also create a network of green corridors and spaces to help mitigate the effect of climate change, link existing green infrastructure on-site and connect with surrounding neighbourhoods and green spaces. The green corridors serve as 'active travel' pedestrian and cycle arteries, wildlife habitat creation and movement routes and space for sustainable drainage systems.

Land at Gibbet Hill Road will reconnect residents to nature by weaving a sustainable urban drainage system through the site to enhance biodiversity and create an attractive outlook for new homes whilst enjoying 'doorstep' nature.



A WELL-CONNECTED SOUTH WARWICKSHIRE

Ensuring that development is physically and digitally connected, provided in accessible locations, and promotes active travel

Response: The site provides new homes near to the principal employment area, The University of Warwick with excellent walking/cycling connections. The proposals aim to reduce commuting distances by supporting growth in locations close to existing business areas and transport connections.

Land at Gibbet Hill Road discourages the use of the private car and promotes active travel to encourage sustainable journeys to meet daily needs by locating homes within a 20 minute cycle to Coventry's City Centre. The proposals seek to make walking and cycling an attractive and viable choice for residents by providing a network of foot and cycle paths set within interconnected green corridors which will be able to connect to the existing infrastructure such as National cycle route 52 to the west.

Designing roads and pavements in such a way that prioritises walking and cycling is key to our proposals, making active travel appealing from the outset. The site also has excellent public transport provision due to its location on a high-frequency bus corridor.

Finally, Land at Gibbet Hill Road offers the potential for remote working to reflect the new working patterns of a post-pandemic world. A survey from the British Council for Offices predicts white-collar workers will adopt a mixed approach, combining remote working with several days a week in the office. Our proposal for the Land at Gibbet Hill Road recognises this as an opportunity to reduce carbon emissions and enhance the wellbeing of residents by providing the opportunity to live and work nearby.



A HEALTHY, SAFE AND INCLUSIVE SOUTH WARWICKSHIRE

Enabling everyone to enjoy safe and healthy lifestyles with a good quality of life

Response: Placemaking is more than just housebuilding, it is about creating great places where people are proud to live. As part of our 20-minute neighbourhood approach, we propose a strong focus on health and wellbeing and sociable spaces to improve the quality of life for all who live in South Warwickshire.

There is evidence associating the quality of the built and natural environments with the health and wellbeing of both individuals and wider populations. There is also evidence that the incorporation of health-promoting elements into developments can help to improve development values – including input from consumer surveys indicating demand for improved access to local amenities such as public open spaces. We believe Land at Gibbet Hill Road should provide a range of high-quality designed landscapes to promote health and wellbeing and encourage social interaction.

Landscapes could include:

- door-step food production, including community orchards and gardens
- children's play areas
- opportunities for social interaction
- re-wilding areas, including the creation of species rich meadow and wetland landscapes, allowing habitats to develop naturally over time

03

THE VISION



LAND AT GIBBET HILL ROAD: THE 20-MINUTE NEIGHBOURHOOD

The vision for the site follows the principles of the 20-minute neighbourhood, a model for sustainable placemaking developed by the Town and Country Planning Association.

As demonstrated on pages 22-31, the Land at Gibbet Hill Road is situated at an inherently sustainable location with a range of facilities, employment and education opportunities accessible within a 20 minute walk, cycle or bus ride.

WHAT IS A 20-MINUTE NEIGHBOURHOOD?

Societies around the world are facing a number of urgent, interconnected problems, including how to reduce carbon emissions, how to help people become more active to improve health and wellbeing, how to reduce loneliness and how to improve high streets and neighbourhoods that have declined.

The idea of the 20-minute neighbourhood (also known as 15-minute cities) supports the vision of the draft South Warwickshire's Local Plan and has grown with interest around the world, especially since the COVID-19 pandemic put a spotlight on the importance of the liveability of where we live. As stated in Wiltshire Council's Emerging Spatial Strategy, the COVID-19 pandemic is **“changing the way we look at our surroundings, changing our behaviour and, longer term, how we manage our environment.”**



Sources:

<https://www.tcpa.org.uk/garden-city-principles>

20-minute neighbourhoods are complete, compact and connected places where people can meet their everyday needs within a short walk or cycle. The idea of the 20-minute neighbourhood presents multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities and tackling climate change.

Every community has its own context and aspirations for the future. Any plans to create a 20-minute neighbourhood should be based on what the local community wants. However, the following characteristics, or ‘ingredients’, are likely to be part of the mix:

- Diverse and affordable homes
- Well-connected paths, streets and spaces
- Schools at the heart of communities (already present within Coventry)
- Good green spaces in the right places
- Local food production
- Keeping jobs and money local
- Community health and wellbeing landscapes and facilities
- A place for all ages

The 20-minute neighbourhood is also closely aligned with the Active Design principles developed by Sport England in partnership with Public Health England. Active Design is focused on enabling people to incorporate physical activity into their daily routine through a built environment designed and laid out to support healthier and more active lifestyles. Active Design is a key guidance document intended to help unify health, design and planning by promoting the right conditions and environments for individuals and communities to be active and healthy.

Although national planning policy does not refer directly to 20-minute neighbourhoods, the National Design Guide (updated January 2021) and the draft National Model Design Code (issued in January 2021) contain useful guidance on topics such as masterplanning, street layout, connectivity, density and active travel, all of which can contribute to the creation of 20-minute neighbourhoods.

Based upon the principles of 20-minute neighbourhoods, the Land at Gibbet Hill Road is a sustainable location for new development and benefits from a wide range of nearby facilities in the city centre and wider area whilst also being able to deliver significant new publicly accessible open space.

NEW HOMES FOR EVERYONE

The development offers a large variety of house types and tenures to suit a wide range of households looking to get on the housing ladder, buy a family home or downsize. Accessible and adaptable homes enable people to stay in their homes as their needs change. This approach encourages social cohesion by providing the opportunity for residents to stay in the local area and maintain all-important friend and family networks throughout their lifetime. Homes will also be designed to facilitate comfortable home working and be future-proofed for flexible working arrangements.



A HEALTHY AND ATTRACTIVE PLACE

There is evidence associating the quality of the built and natural environments with the health and wellbeing of communities. The Land at Gibbet Hill Road will provide a range of high-quality landscapes to promote health and wellbeing.

There is an opportunity for the development to provide a positive contribution to the green infrastructure and public open space of south Coventry. The landscape is currently used for agricultural purposes and is inaccessible to the public. The site's allocation would open it up to the public through the provision of strategic open space which would encompass play, landscaping, parklands, as well as significant biodiversity improvements, to allow both people and nature to live alongside each other.

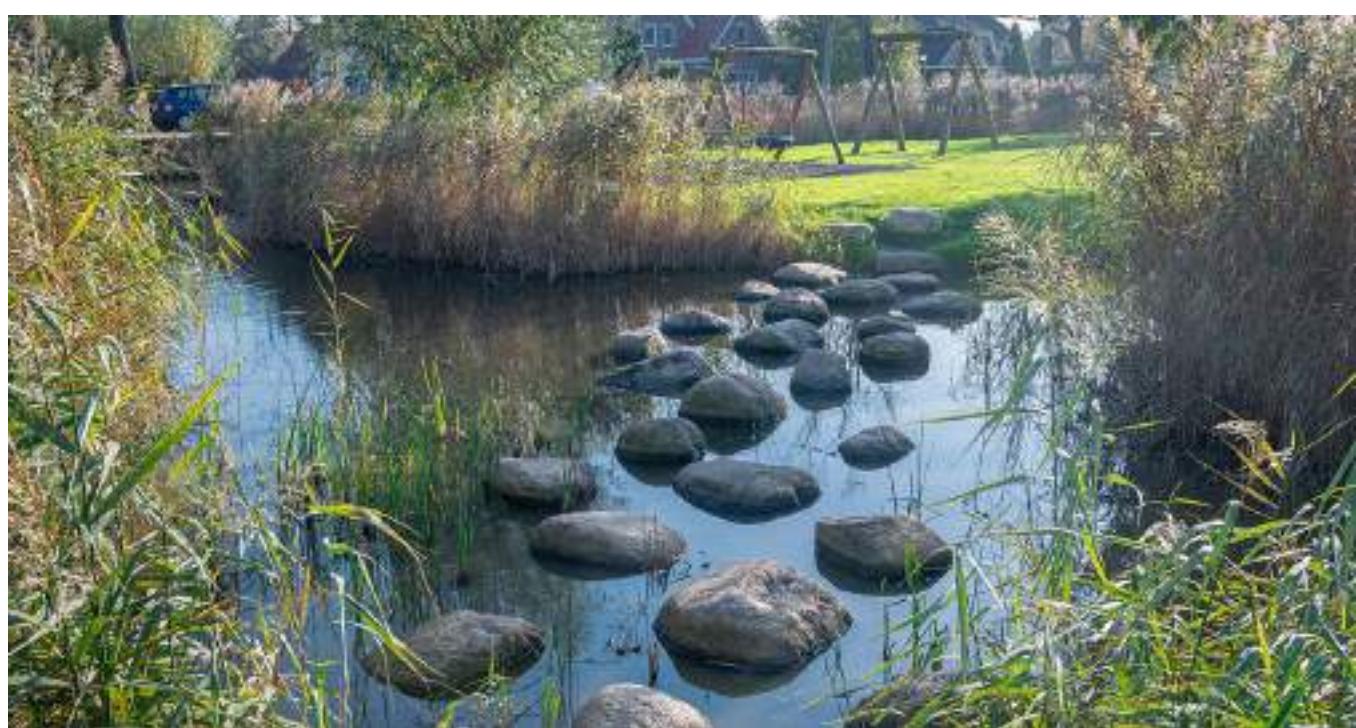
High quality communal green spaces would be connected with green corridors that facilitate active travel and encourage walking and cycling, especially to onward sustainable transport connections and existing public rights of way. This approach combined with the creation of safe, attractive routes serves to reduce reliance on the car, reduce carbon emissions and help to promote the health and wellbeing for all.

Wildflower meadow grassland planted within open space and verges would provide new habitats for invertebrates, and thus foraging habitats for both bats and birds. This would improve the character of the landscape, peoples' contact with nature and their general wellbeing.

Where possible, existing hedgerows would be retained and enhanced with gaps filled to ensure a greater diversity of species would occur, including with many more trees.

SuDS would be incorporated to treat and hold surface water prior to discharge. Features could include swales, rain gardens, pervious surfaces, filter trenches, and infiltration basins/ponds. These would predominantly be placed within the western parkland area as part of a network of green corridors to add diversity.

Community allotments and orchards could provide opportunities for on-site food growing.





DEVELOPMENT PRINCIPLES

The following pages set out a sequence of diagrams to show the key organising principles for the proposed development at Land at Gibbet Hill Road, Coventry.

The design rationale is based upon South Warwickshire's vision and strategic objectives and the 20 minute neighbourhood and has been developed in response to contextual analysis and technical constraints work set out earlier in this document.



1. CREATE A RIVER PARKLAND TO ENHANCE, LINK AND EXPAND SOUTH WARWICKSHIRE'S GREEN AND BLUE SPACES.

Create a new river parkland along the western edge to provide a continuous soft green edge between Tocil wood and nature reserve and the countryside to the south, promoting health and wellbeing and to enhance biodiversity.

The river parkland will:

- promote walking and cycle links with Coventry and the countryside
- create a naturalistic and tree planted soft edge between the site and open countryside to mitigate for external views
- promote health and wellbeing through the provision of a variety of active and leisure landscapes
- provide an opportunity to create a range of 'growing landscapes', including allotments, community orchards and gardens to promote wellbeing
- incorporate areas of formal and natural play including sports pitches to promote health and wellbeing
- create an attractive outlook for new homes to create a truly distinctive place

The existing topography and proposed



parkland provides an opportunity to create a sustainable urban drainage system (SuDS) of swales and ponds to manage surface water. The creation of a SuDS network provides the opportunity for semi-wetland habitats to enhance biodiversity. Swales and ponds also provide a place for people to enjoy nature and relax.



From top left, clockwise: opportunity for a network of growing landscapes, including community orchards and community gardens, sustainable urban drainage, biodiversity enhancements, wetland and educational landscape, opportunity for cycle connections, natural play features,.



2. OPPORTUNITY TO PROVIDE LANDSCAPE SETTING TO CRYFIELD GRANGE AND KENILWORTH ROAD CONSERVATION AREA

Create a sensitive landscaped setting along the southern boundary. The landscaping will be specifically designed to prevent negative impact on the setting of the Kenilworth Road Conservation Area and Cryfield Grange Grade II listed building.



3. CREATE GREEN CORRIDORS FOLLOWING EXISTING AND HISTORIC HEDGEROW PATTERN

Provide a central green corridor through the site, aligned with historic field boundaries. This will also help to break up the potential massing of the proposed development.





4. PROVIDE A NETWORK OF LANDSCAPED CORRIDORS AND SPACES CONNECTING THE PROPOSED PUBLIC OPEN SPACES.

Landscaped corridors will connect existing and proposed green and blue infrastructure assets to enhance biodiversity as well as break up the massing of the development along the contours of the site.

The development would include street trees to reflect the most recent changes to the NPPF and offer a large variety of house types and tenures to suit a wide range of households looking to get on the housing ladder, buy a family home or downsize. This approach encourages social cohesion by providing the opportunity for residents to stay in South Warwickshire and maintain all-important friend and family networks.



4. CREATE A NETWORK OF SAFE AND ATTRACTIVE WALKING AND CYCLING ROUTES TO PROMOTE ACTIVE TRAVEL, REDUCE CARBON EMISSIONS AND PROMOTE HEALTH AND WELLBEING

The promotion of healthy active travel choices to reduce car dependency is an important feature of the proposals. The proposals seek to make walking and cycling an attractive and viable choice for residents by providing a network of foot and cycle paths set within a spectacular new river parkland and interconnected network of green corridors.

A key pedestrian and cycle route also provides safe and attractive routes across the site towards the National cycle route 52.



3. CREATE A NETWORK OF GREEN AND HEALTHY STREETS

Create a primary street network that follows the natural contours of the Site. The primary street should not exceed a maximum gradient of 1 in 20, where possible, to allow ease of use for groups with limited mobility. The layout of blocks will be designed to minimise the need for excavation or fill. Housing will be interspersed with strategic planting to soften the roofscape of the proposed neighbourhood.

Land at Gibbet Hill Road discourages the use of the private car and promotes active travel to encourage sustainable journeys to meet daily needs. Designing roads and pavements in such a way that prioritises walking and cycling is key to our proposals, and serves to reduce carbon emissions and encourage active travel.



5. CREATE NEW, HIGH QUALITY HOMES THAT SOUTH WARWICKSHIRE CAN BE PROUD OF

High quality, sustainable design and architecture that is distinctive and complimentary to South Warwickshire will be at the heart of the design approach to Land at Gibbet Hill Road. A variety of housing densities will be established to reflect local character and respond to our landscape led approach.

Lower density areas (●) respond to parts of the site at the interface with the countryside that require a lesser intensity of development. Medium/higher density areas (●) respond to parts of the site that are less visually sensitive and that are set in the context of existing development.



MASTERPLAN FRAMEWORK

The Land at Gibbet Hill Road supports the overall vision for the district and five overarching principles set out in South Warwickshire's Issues and Options Consultation document by creating a community based upon the principles established by the 20-minute neighbourhood.

The Land at Gibbet Hill Road has the potential to deliver up to 500 new homes and a new river parkland near to significant local facilities and employment opportunities with an emphasis on design, sustainability and addressing the climate crisis. The development is provided in a generous landscape setting that enhances biodiversity and wellbeing.

Our proposals include:

- up to 500 new high quality and sustainable homes that are distinctive and complimentary to the local context
- a range of landscapes focused on health and wellbeing including a river parkland, edible landscapes, play spaces and landscape corridors
- a network of healthy green streets to promote active travel

- 01 Proposed vehicular access point (most likely in the form of a roundabout)
- 02 Potential pedestrian and cycle connection points
- 03 Retained/enhanced boundary hedgerows
- 04 Green corridor routes throughout development
- 05 Proposed public open space which could include community gardens/allotments, orchard planting, naturalistic young children's play spaces and meadow planting
- 06 Central green corridor, reinstating historic hedgerow alignment
- 07 Development pulled back from countryside edge
- 08 Pedestrian, cycle and emergency access
- 09 Indicative pumping station location
- 10 Village green
- 11 Primary access road
- 12 Sustainable drainage system (SuDS)
- 13 Orchard planting
- Proposed footpath/cycle connections
- Children's play spaces







ARTIST'S AERIAL IMPRESSION





04

CONCLUSION



CONCLUSION

This document has demonstrated the site is deliverable, technically unconstrained and is an inherently sustainable location for new development.

This document sets out our overall vision for the site and development capacity options.

Land at Gibbet Hill Road provides an excellent opportunity to deliver new housing. In addition to providing much needed new housing in a suitable location, the site offers the opportunity to create a western parkland while increasing biodiversity and the health and wellbeing of its residents.

Land at Gibbet Hill Road is a small to medium sized site which the NPPF clarifies, at paragraph 68, can make an “important contribution” to meeting housing requirements, as it can be built out relatively quickly and is not reliant on significant infrastructure delivery. The current consultation on national planning policy reform emphasises the importance of small sites to speeding up housing delivery and diversifying the market, whilst supporting Small and medium-sized enterprises (SME) builders. In addition, the land is controlled by one landowner and is capable of delivering new homes in the early-mid part of the Plan period.





Appendix 4 Concept Masterplan



- 01 Proposed vehicular access point (most likely in the form of a roundabout)
- 02 Potential pedestrian and cycle connection points
- 03 Retained/enhanced boundary hedgerows
- 04 Green corridor routes throughout development
- 05 Proposed public open space which could include community gardens/allotments, orchard planting, naturalistic young children's play spaces and meadow planting
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- 13 Orchard planting

■ Proposed footpath/cycle connections

★ Children's play spaces

CLIENT: _____
L&Q Estates

PROJECT: _____
Land at Gibbet Hill Road

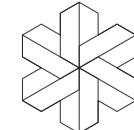
DRAWING: _____
Illustrative Masterplan

PROJECT NUMBER: _____
1388

DRAWING NUMBER: _____
002 CHECKED BY: _____
SR

REVISION: _____
V1 STATUS: _____
Issue

DATE: _____
02/03/2023 SCALE: _____
NTS



MOSAIC
Urban Design & Masterplanning

Appendix 5 Landscape and Visual Appraisal

Land at Gibbet Hill Road: Initial Landscape and Visual Appraisal

Prepared on behalf of L&Q Estates Ltd

March 2023

Land at Gibbet Hill Road: Initial Landscape and Visual Appraisal

Prepared on behalf of L&Q Estates Ltd

Project Ref:	32961
Status:	FINAL
Issue/ Rev:	1
Date:	March 2023
Prepared by:	RL
Checked by:	MF
Authorised by:	MDC

Barton Willmore, now Stantec
7 Soho Square
London
W1D 3QB

Ref: 32961
Date: March 2023
Status: Final

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3.0	Review of Contribution of the site to the Functions of the Green Belt.....	10
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ILLUSTRATIVE MATERIAL

Figure 1: ZTV

Figure 2: Site Photos

Figure 3: Landscape and Visual Opportunities and Constraints Plan

Figure 4: Landscape Strategy Plan

1.0 INTRODUCTION

- 1.1 Barton Willmore, now Stantec (BWnS) Landscape Planning and Design team were instructed by L&Q Estates in February 2023 to provide initial landscape and visual advice on the potential for residential development ('the Proposed Development') of land at Gibbet Hill Road, Coventry ('the Site').
- 1.2 This document represents a summary of BWnS initial Landscape and Visual Appraisal with Green Belt Review (LVAGBR) to support the potential development of the Site and forms part of the documents which will provide representations as part of the South Warwickshire Call for Sites. This LVAGBR should be read in combination with the figures and photographic material. A site visit was undertaken 10th February 2023 during which a series of panoramic photographs were captured, these are included in the representative Site Photographs pack -they are not intended as a comprehensive site or visual appraisal record but, at this initial stage, provide an overview illustration of the character of the Site and its vicinity, as well as the nature of key representative views towards the Site from the surrounding area.
- 1.3 The LVAGBR considers in brief the Site's physical context; relevant character assessments and policies; the features and character of the Site and view towards it; and landscape and visual opportunities and constraints to built development.

2.0 SUMMARY LANDSCAPE AND VISUAL APPRAISAL

Site Location

2.1 The Site is located on the south western edge of Coventry - approximately 5.6km from Coventry City Centre, immediately south of Gibbet Hill Road and approximately 1.14 kilometres (Km) north of Kenilworth. The Site straddles the administrative boundary of Warwickshire County Council (WCC) and Coventry County Council (CCC) and is located within the West Midlands Green Belt.

Topography

2.2 The landform within the Site slopes east to west, from a high point midway along the eastern boundary at approximately 97m Above Ordnance Datum (AOD), which is defined by the rear of existing residential development. The Site falls to a low point at approximately 74m AOD along the western boundary which is defined by an existing watercourse. The surrounding landform is undulating with a series of small hills and ridges with the Site forming the eastern slopes of a shallow localised valley.

2.3 Within the immediate and local setting there are numerous streams running through the localised valleys. There are also a number of notable waterbodies within proximity to the Site to include a waterbody within a wildlife area to the immediate south east of the Site and to the north west within the Tocil Nature Reserve, north of Gibbet Hill Road. The water course which defines the western boundary of the Site runs south from Tocil Nature Reserve, past the Site, where north of Crackley, a suburb that forms the northern most extent of Kenilworth, it heads south east and connects to Finham Brook and then into the River Avon which lies further to the east.

Land Use and Settlement

2.4 The topography and hydrology have in part dictated the settlement pattern and land use in this area. With the university of Warwick and the majority of the surrounding residential development located on the lower lying landform. Agricultural fields (which includes the Site itself) and woodland cover define the local character to the south east and south west with notable areas of woodland on high ground, such as Roughknowles Wood to the west and The Common on the northern edge of Kenilworth.

2.5 Development has expanded south from Coventry, along the A429 / Kenilworth Road, with historic mapping illustrating the existing wooded character of the route that although development has expanded remains today. The existing residential development, formed for the majority of large detached properties, is located in and around this wooded setting. Mature

woodland / trees define the local settlement edge to Coventry, with the settlement edge extending further south than the Site itself. There are a number of notable existing and emerging features within the local landscape. The University of Warwick campus lies to the north / north west with the views over the main campus visible from the higher ground within the Site. The existing railway line between Kenilworth and Coventry runs on a north east / south west axis to the east of the A429. At the time of the Site visit work has begun on the section of HS2 which runs through the immediate setting to the south, where is cuts through the arable and wooded landscape.

2.6 Land use in the local wider context towards the southeast and southwest is generally agricultural fields, which gives way to numerous notable woodland blocks some of which are local nature reserves. These features are divided by the local road network, including major A roads such as the Warwick Bypass and the emerging HS2 railway line. These are typical land uses associated with the edge of settlement with further change as a result of recreational activities there are a number golf courses that interrupt the agricultural field pattern and woodlands.

Vegetation

2.7 The Site itself is formed of two agricultural fields, a small linear field forming the north eastern part of the Site, this is separated from the wider Site by an L shaped mature hedgerow with hedgerow trees. This mature vegetation provides a good level of enclosure to this elevated part of the Site and the adjacent existing settlement edge. The wider Site is a large arable field with only a single internal mature tree located within the north western corner, a review of historic maps indicates this could be a historic field boundary tree. Mature vegetation aligns the watercourse that defines the western boundary, the tree cover / woodland extends further east, forming part of a local wildlife area, within which lies a small pond.

2.8 In the immediate vicinity of the Site, the vegetation pattern comprises small to large irregular shaped agricultural fields bound by mature hedgerow with hedgerow trees to the south east and west of the Site. Within the locality there are a number of notable woodland blocks, to the north lies Tocil Wood, this ancient woodland forms part of Tocil Wood Nature Reserve. There are linear tree belts along the A429 to the east of the Site that constitute part of the Wainbody Wood and Stivichall Common Kenilworth Road Spinney Nature Reserve, which includes a further area of ancient woodland to the East.

Designations

2.9 The Site lies within the vicinity of two local nature reserves, Tocil Wood and Meadow Nature Reserve to the north and the Wainbody Wood and Stivichall Common Kenilworth Road Spinney

Nature Reserve to the East. There are also The Crackley Wood, Kenilworth Common, Knowle Hill and Parliament Piece Nature Reserves located approximately 1.2km to the south.

2.10 There are no heritage assets within the Site; with a number of listed buildings within the immediate setting, Cryfield Grange Farmhouse (Grade II) and South Winds residential property - both Grade II located to the south of Cryfield Grange Road. Within the local area, Houses for visiting Mathematicians University of Warwick – Grade I, 3B Series 1 Sculpture – Grade II, and Cryfield House Farmhouse – Grade II, are located north east, north west and west of the Site, respectively. However, it is considered that there is a strong degree of separation between these features and the Site as a result of intervening landform, mature vegetation and built form.

2.11 There are no Public Rights of Way (PRoW) within the Site. However, within the local area to the west and south west there are a number of PRoW, which includes Coventry Way long distance route. The closest route being PRoW 273/W164/1 that stretches 2.7km from the university of Warwick southbound to the town of Crackley.

Landscape Character

2.12 The Site, immediate setting and local area have been subject to published assessment at national, county and settlement level. In this initial Landscape and Visual Appraisal, focus has been given to the more localised assessments at county and settlement level.

National Character Area 97. Arden

2.13 Natural England published the National Character Area Profile and assessments. This provides an up to date set of general Landscape character assessments and outlines guidelines and objectives. The Site is located within the Eastern part of NCA 97 and forms part of the Arden Parklands.

Key characteristics of the NCA include:

- *Well-wooded farmland landscape with rolling landform.*
- *Strongly Geologically diverse with rocks ranging from the Precambrian to the Jurassic and overlain by superficial Quaternary deposits.*
- *Mature oaks, mostly found within hedgerows, together with ancient woodlands, and plantation woodlands that often date from the time of enclosure. Woodlands include historic coppice bounded by woodbanks.*
- *Narrow, meandering clay river valleys with long river meadows; the River Blythe SSSI lying between the cities of Coventry and Birmingham is a good example of this.*
- *Numerous areas of former wood-pasture with large, old, oak trees often associated with isolated remnants of more extensive heathlands. Village greens/commons have a*

strong association with remnant lowland heath. Fragmented heathland persists on poorer soils in central and northern areas.

- *Diverse field patterns, ranging from well hedged, irregular fields and small woodlands that contrast with larger semi regular fields on former deer park estates, such as, Packington Hall and Stoneleigh Park.*
- *Complex and contrasting settlement pattern with some densely populated where traditional settlements have amalgamated to form the major West Midlands conurbation while some settlements remain distinct and relatively well dispersed.*
- *North-eastern industrial area based around former Warwickshire coalfield, with distinctive colliery settlements. North-western area dominated by urban development and associated urban edge landscapes such as managed greenspace, for example allotments, gardens, parks, golf courses (rough areas) and public open spaces; playing fields, churchyards, cemeteries and institutional grounds (schools, hospitals).*
- *Transport infrastructure, the M42, M40, M6 and M5 are major transport corridors that sit within the landscape of this NCA.*
- *Shakespeare's 'Forest of Arden', featured in 'As You Like It', is still reflected through the woodland cover, mature oaks, small ancient woodlands and former wood pasture.*

2.14 The assessment sets out a number of Statements of Environmental Opportunity, those relevant to the Site and the potential development of the Site are the following:

SEO 1: Manage and enhance the valuable woodlands, hedgerows, heathlands, distinctive field boundaries and enclosure patterns throughout the NCA, retaining the historic contrast between different areas while balancing the needs for timber, biomass production, climate regulation, biodiversity and recreation.

SEO 2: Create new networks of woodlands, heathlands and green infrastructure, linking urban areas like Birmingham and Coventry with the wider countryside to increase biodiversity, recreation and the potential for biomass and the regulation of climate.

SEO 4: Enhance the value of Arden's aquatic features such as the characteristic river valleys, meadows and standing water areas like Bittell Reservoirs to increase resource protection, such as regulating soil erosion, soil quality and water quality.

County Landscape Character – Warwickshire Landscape Guidelines

LCA 97 – Arden Parklands

2.15 Key characteristics of the LCA include:

"Overall Character and Qualities

- *An enclosed, gently rolling landscape defined by woodland edges, parkland and belts of trees*

Character Features

- *Middle Distance Views enclosed by woodland edge.*
- *Belts of mature trees associated with estate lands.*
- *Many ancient woodlands, often with irregular outlines.*
- *Large country houses set in mature parkland.*
- *Remnant deer parks with ancient pollard oaks.*
- *Thick roadside hedgerows, often with bracken.*

"Topography, geology and drainage

2.16 The assessment provides the following description of the landscape character:

"Arden parklands is a planned estate landscape closely associated with an area of former wood pasture and historic deer parks. This landscape is especially characteristic of the gently rolling countryside of central Arden between Wroxall and Stoneleigh and in the lower Blythe valley. The landscape pattern is medium to large in scale and defined by woodland edges, belts of trees and wooded streamlines. The impression of enclosure is enhanced by the almost flat topography, which emphasises woodland edges and makes the shape and composition of woodland blocks relatively unimportant. Well wooded streamlines and mature hedgerow oaks reinforce this impression which is repeated throughout the landscape creating a sequence of linked wooded spaces. Where the pattern of medium to large sized fields has become fragmented these spaces can appear rather open and featureless, but middle distance views are typically enclosed by the surrounding wooded skylines. This heavily wooded appearance maintains a sense of unity in a landscape that is both intensively farmed and under pressure from suburbanisation and urban development. These pressures are most apparent around Curdworth and in the area between Birmingham and Coventry.

Woodlands are of varied composition, but are typically large in size. A significant number are irregularly shaped ancient woodlands, some of which have remained largely semi-natural, such as Crackley Wood near Kenilworth. Other ancient woodlands such as Hay Wood to the south of Baddesley Clinton have been replanted with conifers or other non-native species, but retain valuable semi-natural vegetation along rides and edges. Hay Wood is a particularly good example of 'assarting', the piecemeal conversion of former woodland into, private farms which has left characteristic ragged edges.

Geometrically shaped plantations, usually consisting of mixed, non-native species, complement the pattern of ancient woodlands. These were mostly established in the 18th and 19th centuries when many of the large estates were created and land was enclosed from waste. Another feature particularly

characteristic of this landscape are the parklands established at the same time, which formed the centrepiece around the estate house or hall. One or two, such as Arbury Berkswell and Umberslade, still retain the classic parkland structure of mature specimen trees within a pastoral setting. Others such as Chadwick Park have been converted to arable, but can be identified by the isolated mature trees which remain as testament to their former splendour. Golf courses are a more recent feature of Arden Parklands and in places have been sited within former parks.”..

2.17 The Warwickshire Landscape Guidelines provides a series of general development guidelines, those relevant to the Site and the type of development proposed include:

- *Conserve all sites of archaeological and historical importance.*
- *Conserve the character of rural settlements by retaining existing features and local patterns in all development schemes*
- *Soften hard built edges through increased tree planting within and around new development*
- *Protect and conserve the irregular pattern and characteristic features of roads and lanes*

2.18 The assessment provides an overall management strategy for the Arden Parklands as '**Retain and enhance the effect if wooded enclosure**' and provides the following landscape guidelines:

- *Species selection along woodland edges should favour native trees and shrubs*
- *Enhance tree cover through the planting of new woodlands and belts of trees*
- *Conserve and strengthen primary hedgerows and manage these more positively as landscape features*

Landscape Planning Policy

2.19 Warwickshire District Council (WDC) Local Plan (Adopted September 2017) includes the following policies relating to the Site and type of development proposed.

2.20 **Policy DS18: Green Belt** - The extent of the green belt is defined on the Policies Map. The Council will apply national planning policy to proposals within the green belt.

2.21 **Policy BE1: Layout and design** - New development will be permitted where it positively contributes to the character and quality of its environment through good layout and design. Development proposals will be expected to demonstrate that they harmonise with or enhance the existing settlement. Relating well in terms of topography and landscape features, with the latter enhanced and incorporated within the development.

2.22 **Policy BE3: Amenity** - Development will not be permitted that has an unacceptable adverse impact on the amenity of nearby uses and residents and / or does not provide acceptable standards of amenity for future users and occupiers of the development.

2.23 **Policy NE1: Green Infrastructure** – the districts green infrastructure (GI) assets will be protected, enhanced, and restored with the aim to provide a healthy integrated network for the benefit of nature, people and the economy. GI will be planned at a landscape scale to protect and enhance existing habitats and restore fragmented areas, ensuring access to natural green space and improve the overall landscape character.

2.24 **Policy NE4: Landscape** – New development will be permitted that positively contributes to landscape character.

2.25 Development proposals will be required to demonstrate that they:

- a) "integrate landscape planning into the design of development at an early stage;
- b) consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity;
- c) relate well to local topography and built form and enhance key landscape features, ensuring their long term management and maintenance;
- d) identify likely visual impacts on the local landscape and townscape and its immediate setting and undertakes appropriate landscaping to reduce these impacts;
- e) aim to either conserve, enhance or restore important landscape features in accordance with the latest local and national guidance;
- f) avoid detrimental effects on features which make a significant contribution to the character, history and setting of an asset, settlement, or area;
- g) address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing these features through means such as buffering and reconnecting fragmented areas;
- h) maintain the existence of viable agricultural units, and;
- i) are sensitive to an area's capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements.."

Site Appraisal

2.26 To illustrate the visibility of the Site a Zone of Theoretical Visibility (ZTV) was produced, see **Figure 1**, from this a selection of views have been chosen - Site Photographs 1-6 are used to illustrate the character and visibility of the Site, see **Figure 2**, which are taken from the Site and surrounding area. A

2.27 The Site comprises of agricultural land situated south of Gibbet Hill Road. There is a notable change in topography within the Site, **Site Photograph 1**; the Site gently falls east to west with the north eastern part of the Site forming the highest point. The eastern boundary of the Site is formed by residential boundaries – defined by mature hedgerow or closed board fencing - **Site Photograph 2**. There is a degree of existing development within the Site, a small farm complex consisting of a farmhouse and outbuildings is located centrally along Cryfield Grange Road that runs on a south border of the Site.

Visual Appraisal

2.28 Filtered views over the Site are possible from the roads that bound the Site - Gibbet Hill Road to the north and Cryfield Grange Road to the south - **Site Photograph 3**. Views from the existing settlement that bounds the east over the Site are limited due to the orientation of built form, existing topography, and intervening vegetation - **Site Photograph 1 and 2**. The existing PRoW that pass over more elevated landform to the west / south west of the Site have views towards the Site, with the higher ground within the east of the Site being the most suitable - **Site Photograph 5**.

2.29 The nature of the topography in and around the Site plays a key role in varying visibility into and over Site. As the landform rises within the wider landscape, the Site and wider settlements become more evident. Views from the wider landscape / higher ground are limited by the combination of landform and mature vegetation which heavily restrict views to no more than glimpse - **Site Photograph 6 and 7**. Views towards the Site from the northern settlement edge of Kenilworth look over the falling landform, the construction activities associated with HS2 and the existing development along Kenilworth Road to the west of the Site with the University of Warwick Buildings glimpsed in the distance. The nature of the intervening landform and the existing vegetation is such that the Site itself is not visible in the views - **Site Photograph 8 and 9**.

2.30 The Site appraisal and field work has informed the development of the Landscape and Visual Opportunities and Constraints Plan – see **Figure 3**. This informed the development of the proposals, to include location of development and nature and character of the proposed GI.

3.0 REVIEW OF CONTRIBUTION OF THE SITE TO THE FUNCTIONS OF THE GREEN BELT

Criteria	Discussion	Contribution to Green Belt Purpose
Check the unrestricted sprawl of large built-up areas	<p>The Site is bound by roads to the north and south, these provide robust boundaries between the Site and the immediate countryside. Whilst the development would result in an extension to the southern settlement edge of Coventry, the development would relate well to this existing residential area. The proposals look to set development within a comprehensive landscape framework, that establishes a robust green infrastructure network to include green corridors through the Site and retaining the existing mature vegetation, these alongside the Site's topography that helps limit the extent of development within the Site.</p>	Limited
Prevent nearby towns from merging into one another	<p>The existing settlement edge of Coventry extends south along the A429, extending beyond the Site. Crackley, a suburb of Kenilworth defines the northern extent of development to the south, with the Green Belt approximately 565m in width between these settlements.</p> <p>The Site and any potential development is located to the north west of this gap and would not result in reducing this gap or the merging of the settlements.</p>	None
Assist in safeguarding the countryside from encroachment	<p>Development within the Site would result in a small loss of countryside due to it being located outside of the defined urban area. However, there is limited existing development within the Site, with the Site bound by Cryfield Grange Road to the south and a watercourse to the west, these provide strong and defined boundaries between the Site and more open rural countryside beyond.</p> <p>Potential development of the Site provides an opportunity to improve the overall quality of the landscape and character of the Site. Potential development of the Site should include restoration and enhancement of key landscape features, to include tree and hedgerow cover with additional blue infrastructure and native scrub planting. These should form the main features of any proposed green infrastructure that will include a series of footpath and cycle ways, improving public access to the Site and connecting to the existing network of routes.</p>	Moderate
Preserve the setting and special character of historic towns	<p>The Site does not lie within or in close proximity to any designation for landscape value or contain any listed buildings. There are no features of historic significance in or visible from the Site. Although the Site is located on rising landform, it is lower lying than the surrounding local landform.</p> <p>The hedgerow / woodland that defines the Site boundaries, with a notable area of woodland</p>	None

Criteria	Discussion	Contribution to Green Belt Purpose
	immediately bordering the western Site boundary, does contribute to the vegetated character of the local area. These features would be conserved, as part of any development proposals.	

3.1 Overall, the existing contribution that the Site makes to the wider function of the Green Belt is limited due to the nature of its immediate and local setting. The Site is, for the most part, separated from the local and wider landscape by the adjacent road network, intervening landform and mature vegetation. The combination of these features form defined boundaries that would ensure development would not result in unrestricted sprawl.

3.2 The existing gap between Coventry and Kenilworth is approximately 565m, the Site does not form part of this gap, which itself will be compromised by the construction of HS2 railway line. There is currently a visual link between the two settlement edges with development within the Site not reducing the perceived gap.

3.3 The Site itself is within the countryside and any development within the Site would result in the loss of an area of countryside. However, the potential development of the Site provides an opportunity to improve the overall quality of the landscape and character of the Site and restore a number of historic features.

3.4 The extent of development proposed within the Site is limited by the on-site constraints that include topography, hydrology, road networks and vegetation. Built form would be set within the central and eastern part of the Site and adjacent to the existing settlement edge improving the relationship between the settlement edge and countryside. Proposed built form should be set within an existing and enhanced vegetation structure that consists of mature trees and vegetation, this aims to provide a framework in which to accommodate the proposals and aid the assimilation of the built form into the Site and the receiving landscape. Therefore, it is considered that the Site can be successfully developed within the context of the Green Belt

4.0 CONCLUSION: LANDSCAPE AND VISURAL OPPORTUNITIES AND CONSTRAINTS

4.1 On the basis of this analysis of the landscape and visual baseline, it is concluded that there is potential for sensitive residential of the Site, subject to a number of opportunities and constraints and strategic design principles. These are illustrated on **Figure 3** and set out below.

4.2 The existing settlement edge of Coventry and Kenilworth is located on falling landform with the intervening landform and notable areas of woodland within the local and wider area providing a degree of enclosure to the existing built form and the Site. Existing development is mainly located within the A45 ring road around Coventry with GI set around the existing streams, rivers, and hills. This pattern in relation to topography forms part of the distinct identity and character of settlement. There is potential within the Site to provide a rational extension of the settlement pattern on and around land south of Gibbet Hill Road.

4.3 Development within the Site would form a logical extension to the existing neighbouring development along the A429, with the potential to provide a more sensitive settlement edge with development facing the landscape set back beyond an area of open space. This would replace the existing side elevations or rear garden boundaries that currently provide a poor transition between the built form and local countryside. Development within the Site also looks to significantly increase and enhance hedgerow, tree and woodland cover within the Site, notably along historical field boundary lines through the centre of the Site and to the Site boundaries, in accordance with published character guidance and best practice.

4.4 There is substantial potential for multi-functional and locally distinctive GI to provide a positive and accessible settlement edge landscape. Beyond the open green slopes, there would be enhanced areas of wetland on the lower lying parts of the Site to the west, including sustainable drainage (SuDS) basins, enhancing the legibility of the topography and providing increased biodiversity opportunity – as illustrated on **Figure 4: Landscape Strategy Plan**.

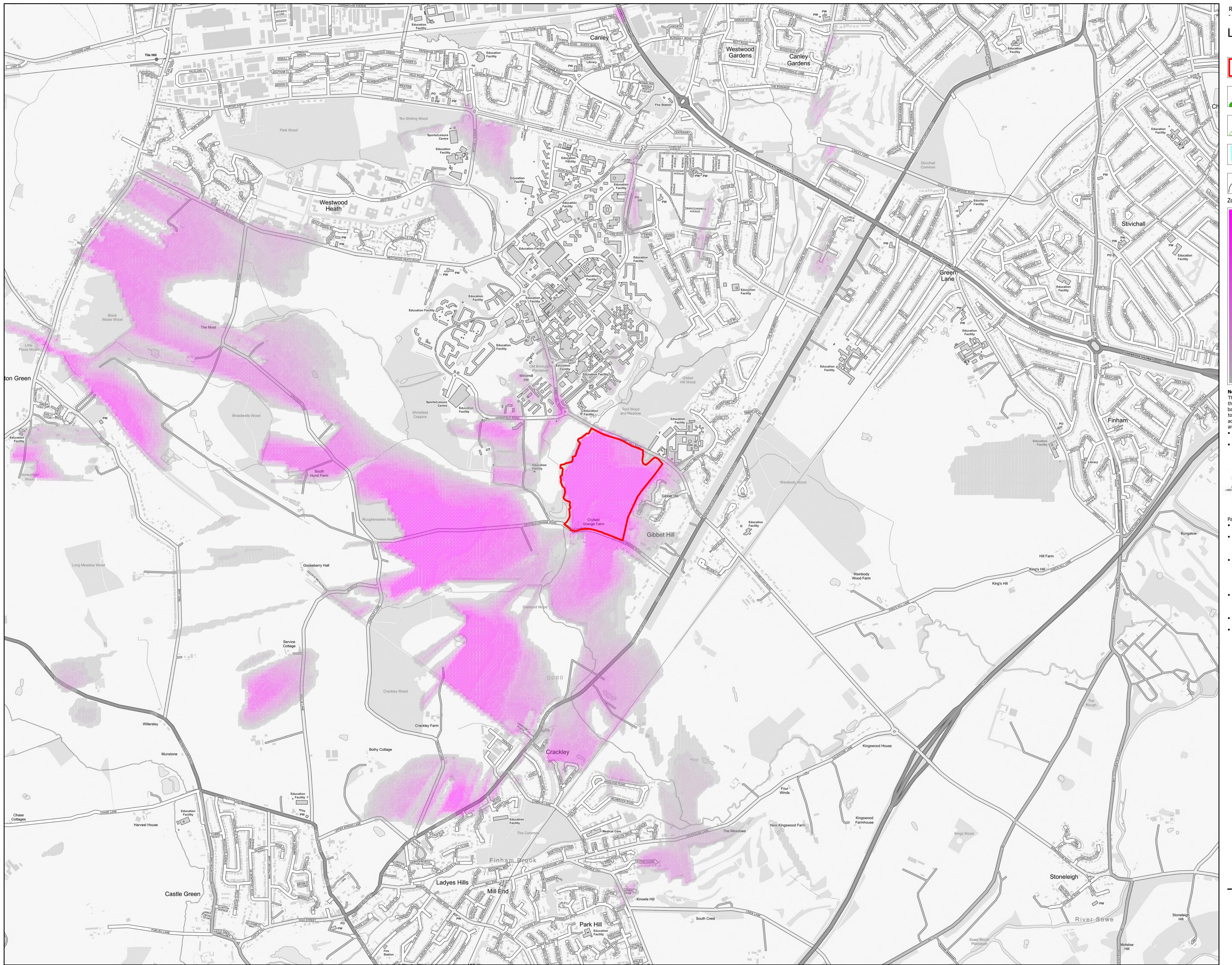
4.5 In relation to Planning Policy BE1 and BE3 the development of the Site would be high quality, with a careful design approach adopted which has resulted in the proposals clearly responding to the onsite topographical and hydrological constraints. The existing mature vegetation framework within the Site would be retained and enhanced with development set within a characteristic landscape setting that will reflect the local character. Aside from the locally distinctive strategic landscape design approaches proposed, there is also potential for the built form to respond to the local vernacular which would provide reinforcement of sense of place and local identity.

4.6 In relation to Policy DS18, it is considered that the contribution the Site makes to the Green Belt is reduced by the adjacent road network, intervening landform, mature vegetation and built form. The extent of proposed development within the Site is limited by the onsite constraints, that include topography, hydrology and vegetation. Built form would be set within the Site adjacent to the existing development located on higher ground to the east. The existing defined boundaries of the Site would ensure that development of the Site would not result in urban sprawl. The existing gap between Coventry and Kenilworth would not be effected by development within the as the Site does not form part of this gap where there is currently a visual link between the two settlement edges. The Site itself is within the countryside and as such development would result in the loss of an area of countryside. However, the potential development of the Site provides an opportunity to improve the overall quality of the landscape and character of the Site and restore a number of historic features.

4.7 In relation to Policy NE1 and NE4 the development of the Site will retain the existing mature vegetation where possible. Within the proposed open space there will be a series of permissive footpaths and cycle routes, promoting a healthy life style and providing connections to the local area. Development would maintain and enhance functionality of the GI, including a sensitive and logical response to the character of the settlement edge and topography in this vicinity; provide enhanced drainage and biodiversity opportunities throughout the proposed Site wide GI network.

4.8 It is therefore considered that in landscape and visual terms there is potential for a sensitive development of the Site, that would be a logical extension of the existing settlement in relation to its distinctive topographic setting; would minimise harm to landscape character and views; and would provide potential for extensive locally characteristic and important multi-functional GI.

FIGURE 1:
ZTV



The scaling of this drawing cannot be assured

Revision Date Drn Ckd

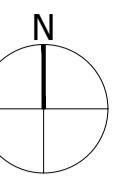


FIGURE 01

Land at Gibbet Hill

Drawing Title
Zone of Theoretical Visibility (ZTV)
2 Storey Development with Barriers

Date 08.02.2023 Scale 1:10 @ A1 Drawn by ML Check by MF
 Project No 32961 Drawing No LN-LP-01 Revision

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FIGURE 2:
SITE PHOTOS



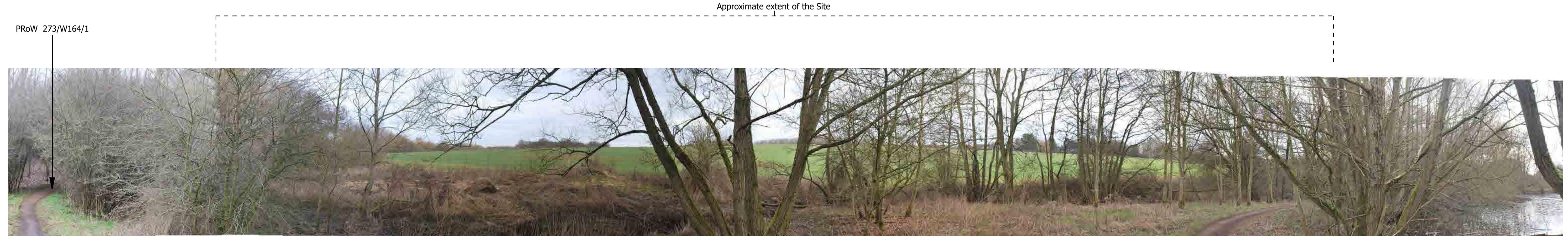
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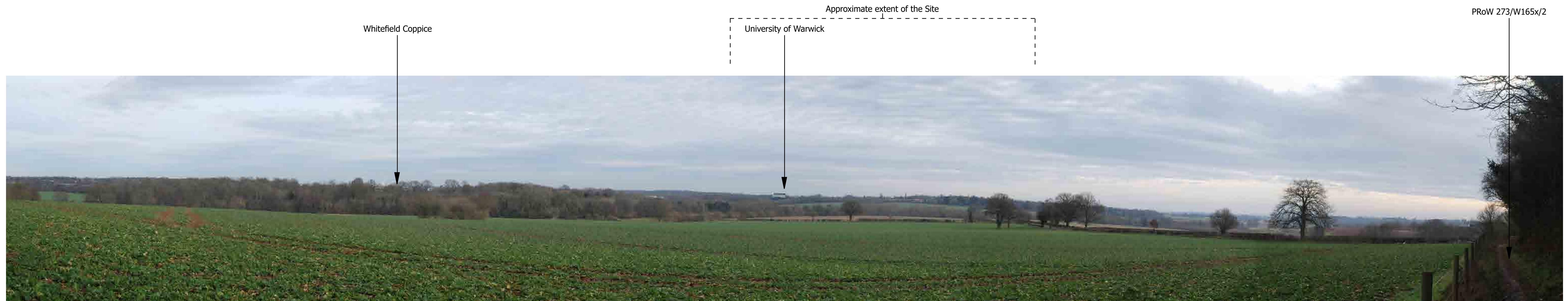
Site Appraisal Photograph 2:



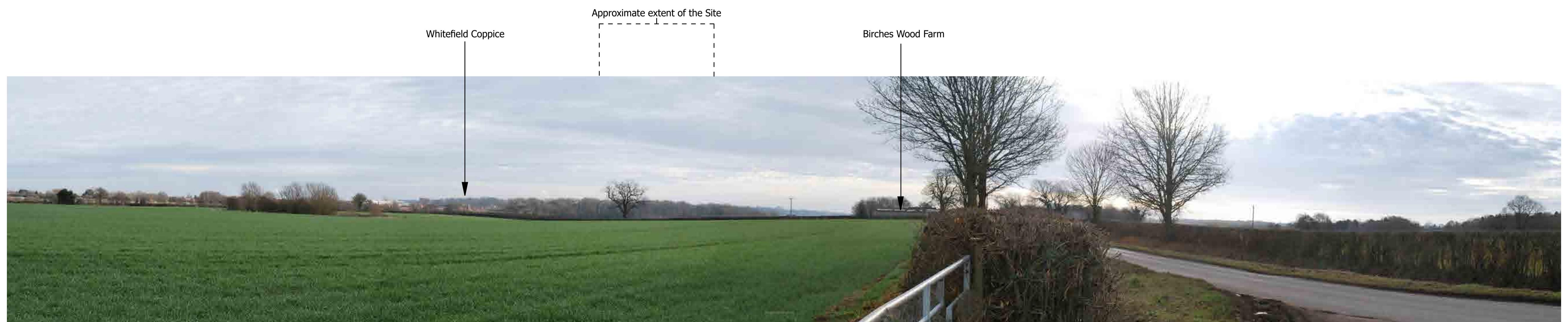
Site Appraisal Photograph 3:



Site Appraisal Photograph 4:



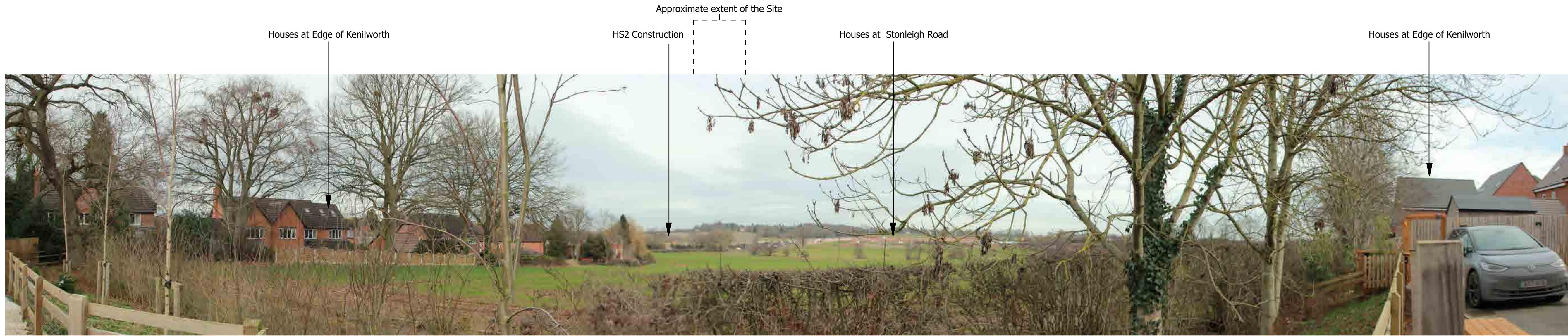
Site Appraisal Photograph 5:



Site Appraisal Photograph 6:



Site Appraisal Photograph 7:



Site Appraisal Photograph 8:



Site Appraisal Photograph 9:

Site Appraisal Photograph C:

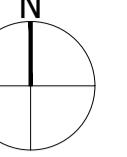
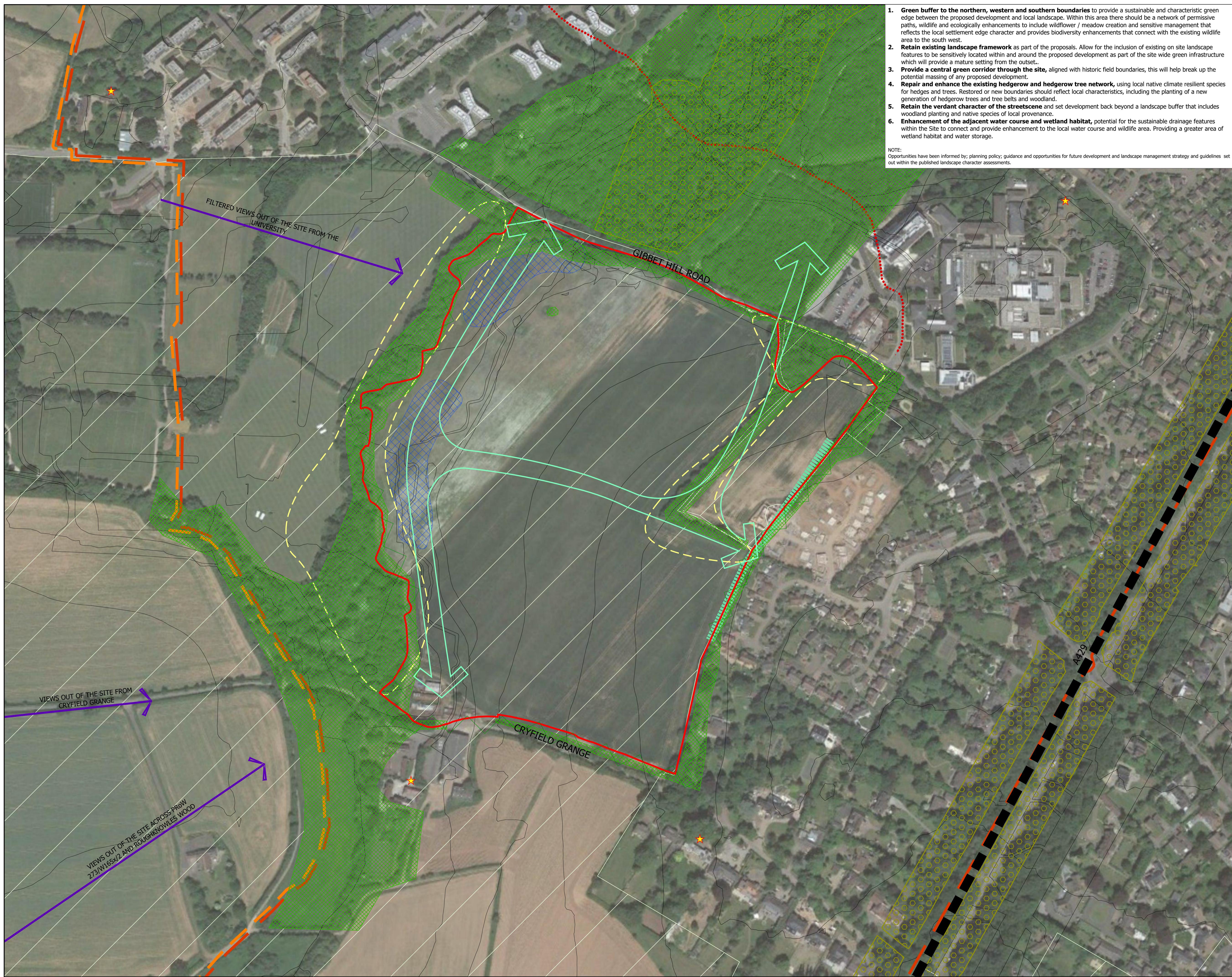
Project number: 32961
 Project Name: Gibbet Hill Road

Site Appraisal Photographs
 Photograph A - C

Date Taken:
 Visualisation Type:

11.02.2023
 Baseline

FIGURE 3:
LANDSCAPE AND VISUAL OPPORTUNITIES AND CONSTRAINTS PLAN



LEGEND

- Site Boundary
- Existing Woodlands, Copses and Tree Belts ^
- Contours/Spot Heights (Metres AOD) ^
- No. —
- Cycle Route ++
- Listed Buildings ~
- Green Belt ^^
- Flood Zone 2
- Flood Zone 3
- Key Long/Medium Distance Views
- Potential Green Links through the Site
- Major Road - B6225
- Existing Sensitive Settlement Edge
- Blue/Green Enhancement Zones
- Indicative Location of Proposed Ponds

FIGURE 4:
ILLUSTRATIVE LANDSCAPE STRATEGY PLAN



LANDSCAPE STRATEGY

The overarching landscape strategy is to create a strong sense of place based on the retention of existing landscape features, including mature hedgerows and hedgerow trees. These existing, valuable landscape features will be reinforced and complemented by new landscape features, guided by a considered landscape design rationale and informed by the landscape and visual characteristics of the site and its context, resulting in a robust, appealing and rich environment to the benefit of habitats and people.

A strong green infrastructure framework of publicly accessible open space to reflect the existing settlement edge. They would be managed positively for biodiversity and water attenuation and planted with a rich palette of native and ornamental species, including wildflower meadow.

Soft Landscape Strategy

The majority of existing onsite vegetation would be retained as part of the proposed development, this will be strengthened by the introduction of a considerable number of new native shrub, hedgerow, tree and woodland. The new native planting will provide a landscape strategy that will be rich and appealing to new and future residents and users of the public open space. Species selection for new planting is based upon the particular conditions and design aims of different types of spaces and their associated uses. The soft landscape palette would thereby respond positively to new built form, while also providing a range of ecosystem services and improving air quality.

Suggested Native Tree and Understorey Palette

- Acer campestre
- Alnus glutinosa
- Betula pendula (air quality)
- Betula pubescens
- Carpinus betulus
- Malus sylvestris
- Sambucus nigra (air quality)
- Prunus spinosa
- Quercus robur
- Taxus baccata (air quality)



Suggested Street/Ornamental Tree Palette

- Acer campestre 'William Caldwell'
- Amelanchier lamarckii 'Robin Hill'
- Betula papyrifera var. kenaica - Multi-stem
- Fagus sylvatica 'Dawyck Purple'
- Prunus 'Sunset Boulevard'
- Pyrus calleryana 'Chanticleer'
- Tilia cordata 'Greenspire'



Suggested Wet Woodland Planting Palette

- Salix alba
- Salix caprea
- Alnus glutinosa
- Populus nigra
- Populus tremula



Habitat Strategy

Biodiverse planting will include species-diverse amenity grassland, native wildflower wetland planting and native aquatic planting in key areas of the proposed development to provide new habitat and foraging opportunities for local wildlife. These areas would sit within the wider framework of Green Infrastructure within the site, drawing together existing areas of planting, and responding to and implementing the recommendations from ecologists.



Play Strategy

The proposed development would include exciting and imaginatively designed playgrounds, providing a key benefit to future residents and the wider public. The play areas will be robustly detailed and be in accordance with the general requirements as set out in Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard produced by Fields in Trust. The play spaces would be designed to create enjoyable, interactive and safe environment for families, with a range of diverse and challenging equipment and natural play features.



Circulation Strategy

Vehicular and pedestrian circulation within the proposed development has been designed to connect and integrate with the surrounding urban and rural landscape. These arterial routes facilitate a connection to the surrounding neighbourhood as well as to the open spaces and informal pathways along the perimeter of the site, helping establish a permeable network of streets and spaces that add to the existing infrastructure.

Rain Water Gardens

The proposed development would include a series of interconnected drainage features such as rain water gardens as part of the site wide drainage strategy. The SuDS are designed to manage surface water runoff, flooding and pollution risks from the proposed development. SuDS offer range of functions and benefits, through slowing the infiltration and run off rate and where possible providing attenuation. The integration of these blue infrastructure components within the wider green infrastructure framework will provide points of interest, create habitat and increase the overall biodiversity value of the site.

Maintenance Strategy

The maintenance strategy would be based on the following principles:

- Creating a high level of public amenity with good quality, well maintained landscape spaces
- Ensuring the long-term successful establishment of proposed planting
- Conserving and enhancing existing landscape features through improved management
- Maintaining a safe, clean and tidy new neighbourhood for residents and wider public
- Providing visually appealing landscape elements to complement and assimilate the built form
- Species rich lawn mix (eg Germinal WFG20 Eco-species Rich Lawn) to be maintained as lawn to all general amenity areas. On the edges of native hedgerows and woodland, allow an unmown edge to provide a natural transition and pockets of wildflowers for visual and biodiversity interest.
- Enhancing the biodiversity of landscape areas through best practice management frameworks

Figure 04

Project

Land at Gibbet Hill Road

Drawing Title

Landscape Strategy Plan

Date 02.03.2023 Scale 1:1,250 @A1 Drawn by MF

Project No 32961 Drawing No LN-LP-03

Revision RL

6 12 20 30 40 50m 100m

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Appendix 6 Transport and Highway Technical Note



the
transportation
consultancy

EXCEED RESPECT VALUE INNOVATE

Land at Gibbet Hill Road Coventry

Site Promotion

Date: March 2023
Client: L&Q Estates

L&Q
ESTATES

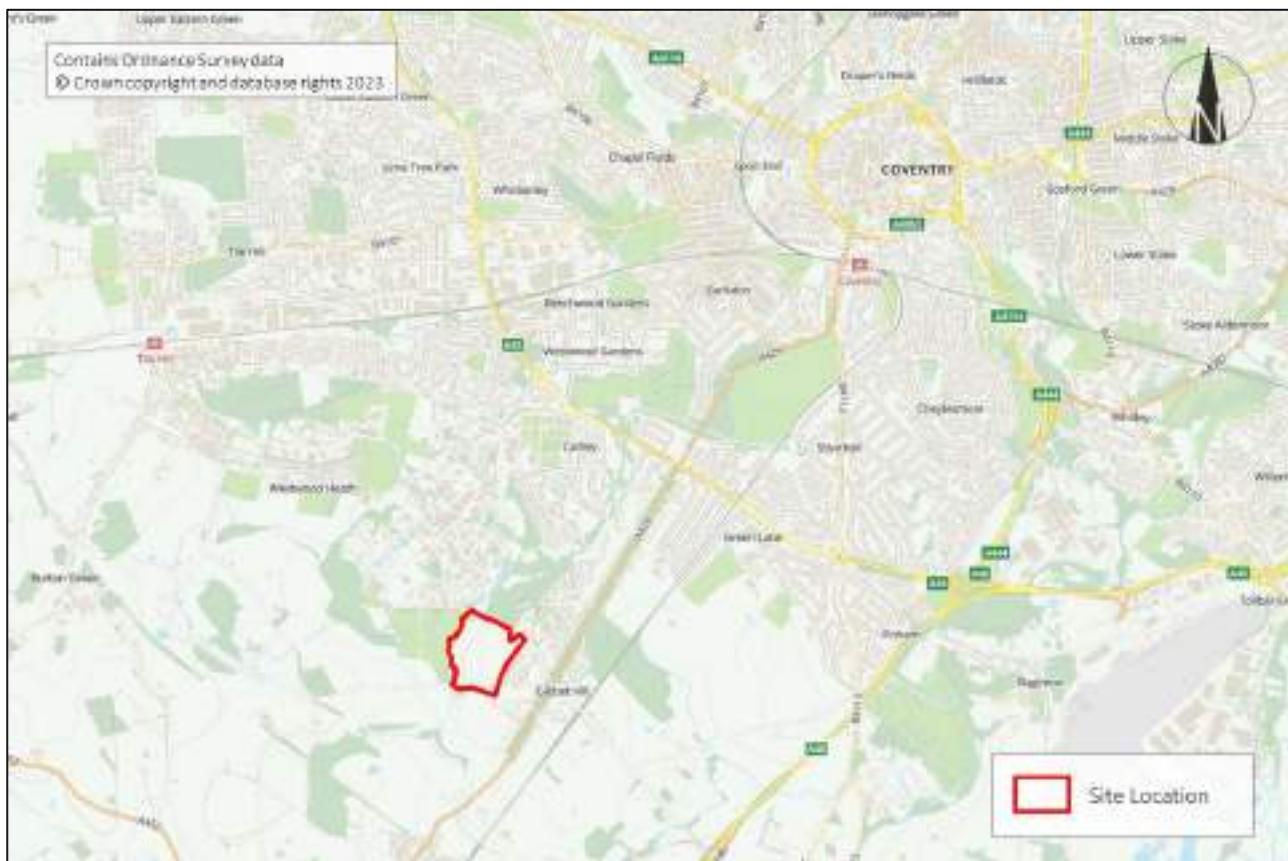
1. Introduction

1.1 Introduction

The Transportation Consultancy Ltd (ttc) have been appointed by L&Q Estates (the client) to prepare a Transport and Highways Technical Note to examine the potential for development on a parcel of land to the south of Gibbet Hill Road, Coventry, Warwickshire.

The location of the proposed development site is provided in **Figure 1.1** below.

Figure 1.1 Site Location



The site is currently vacant and in use for agricultural purposes. It is bound by Gibbet Hill Road to the north, predominantly residential properties to the east, Cryfield Grange Road to the south, and a mix of recreational grounds to the west.

1.2 Purpose of this Report

The Local Planning Authorities of Warwick District Council (WDC) and Stratford-upon-Avon District Council (SDC) are working together to prepare a new 'South Warwickshire Local Plan (SWLP)' to cover the combined geographical area. As part of this process, the combined councils are running a 'Call for Sites' exercise inviting suggestions for potential sites that could be allocated for a variety of land uses. This process will determine developable land availability in the area in order to meet future development requirements.

The SWLP will set out a strategy for how WDC and SDC will meet housing, employment, educational, leisure, and other infrastructure needs in a sustainable way up to the year 2050 and beyond.

This report sets out the feasibility of the site from a Traffic and Transport perspective, and outlines the likely implications relating to access, sustainability, anticipated traffic generation, and the impact on the local road network.

Notwithstanding the above, it has also been acknowledged that the site is situated on the periphery of Coventry and as a result, due consideration has been given to relevant design guidance / policies / initiatives being promoted/pursued by Coventry City Council.

1.3 Report Structure

The remainder of the report is structured as follows:

- **Chapter 2:** Examines the local highway network in relation to the site and reviews local highway safety.
- **Chapter 3:** Examines the site's sustainability and determines access to public transport networks and local services and facilities.
- **Chapter 4:** Sets out the likely access arrangements to support the proposed site for walking, cycling and vehicular access.
- **Chapter 5:** Sets out the anticipated traffic generation from the proposed site and determines the preliminary high-level impact on the local highway network.
- **Chapter 6:** Provides a summary and conclusions to the report.

2. Existing Highway Conditions

2.1 Introduction

This section of the report examines the surrounding local highway conditions, including a review of the existing highway safety record. The site in a local context is illustrated within **Figure 2.1**.

Figure 2.1 Local Highway Network



2.2 Highway Network

The local highway network is managed and maintained by the Local Highway Authority (LHA), Coventry City Council (CCC), though the site itself is within Warwickshire. The local highway comprises of the following:

Strategic Highway Network

The site benefits from easy access to the wider strategic highway network. The A45 can be accessed at a point circa. 1.9km to the north of the site via the A429 Kenilworth Road. The A45 provides onward travel towards Birmingham in the west, and Rugby / M45 / M1 in the east. In addition, the A46 can be accessed via Stoneleigh Road, which affords onwards travel towards the M40 to the south and the M6 to the north.

Local Highway Network

Gibbet Hill Road

Gibbet Hill Road is a single carriageway two-way road (circa. 7m wide) which runs on a northwest to southeast alignment along the northern boundary of the site.

Within the vicinity of the site, the road is subject to a 40mph speed limit (transitioning to 30mph at a point circa. 90m from the north-western corner of the site boundary), features a continuous footway (circa. 1.5-2m wide) along the northern side of the carriageway, with street lighting provided at regular intervals. In addition, a signalised pedestrian crossing is afforded to access the bus stop on the southern side of the carriageway (location shown in **Figure 2.1**).

A429 Kenilworth Road

The A429 Kenilworth Road is a two-way single carriageway road (circa. 7.3m wide) which runs on a northeast to southwest alignment circa. 400m to the east of the proposed site, connecting with Gibbet Hill Road at a four-arm roundabout with Stoneleigh Road.

At the roundabout the A429 is subject to a 40mph speed limit, however this transitions to 50mph at a point circa. 75m to the north and 55m to the south. Northbound from this point, footways are provided on both sides of the carriageway, segregated from the carriageway by grass verge, with street lighting provided at intermittent intervals. To the south a footway is provided along the western side of the carriageway, segregated by grass verge, with street lighting at regular intervals (before terminating at a point circa. 250m south of the roundabout).

The A429 operates as a main connector road between Coventry in the northeast and Kenilworth to the southwest, affording easy access to the University of Warwick (via Gibbet Hill Road).

Cryfield Grange Road

Cryfield Grange Road is a narrow two-way single carriageway road (circa. 3.5m wide) which runs on a northwest to southeast alignment along the southern boundary of the site.

The road is subject to the national speed limit (60mph) with no provision for pedestrians and does not feature any street lighting.

2.3 Highway Safety (Personal Injury Accident Data)

Personal Injury Accident (PIA) data has been extracted from Crashmap (www.crashmap.com) for the most recent 7-year period (July 2015-June 2021), to ensure the 5-year period prior to the COVID-19 Pandemic is duly considered. Crashmap data is collected by the police and is approved by the National Statistics Authority and audited by the Department for Transport each year.

The purpose of assessing recorded PIAs is to determine whether there is a history of accidents in proximity to the site and to investigate whether there are any patterns or contributing factors to the accidents recorded. Clusters of accidents could indicate that improvements are required to enable development on the site to come forward.

The impact of casualties differs according to the severity of the injuries sustained. Three groups are usually differentiated as follows:

- **Fatal:** any death that occurs within 30 days from causes arising out of the accident.

- **Serious:** records casualties who require hospital treatment and have lasting injuries, but who do not die within the recording period for a fatality.
- **Slight:** where casualties have injuries that do not require hospital treatment, or, if they do, the effects of the injuries quickly subside.

To determine the significance of the recorded personal injury accident data, only links or junctions exhibiting more than one accident per annum are typically taken forward for detailed analysis.

The study area for this assessment is illustrated below in **Figure 2.2**, and comprises the following junction and links:

- Junctions:
 - ▶ Junction 1 - Gibbet Hill Road / A429 Kenilworth Road / Stoneleigh Road roundabout; and
 - ▶ Junction 2 – Gibbet Hill Road / Leighfield Road roundabout.
- Links:
 - ▶ Link 1 - Gibbet Hill Road.

Figure 2.2 Recorded PIA's (2015 – 2021)



As can be gauged from **Figure 2.2**, a total of seven accidents have been recorded within the search area in the latest 7-year period. These are split between the junctions and links as follows:

- Junction 1 – three slight accidents (rate of 0.4 per annum).
- Junction 2 – one slight accident (rate of 0.1 per annum); and

- Link 1 – two slight and one serious accident (0.4 per annum).

In light of the above and given that none of the junctions or links exceed a rate of one per annum, it is considered that there are no pre-existing highway safety issues within the vicinity of the site that any future development proposals are likely to exacerbate.

2.4 Conclusions

This section of the report demonstrates that the site is well connected to both the local and strategic highway network. A review of highway safety within the vicinity of the site shows there are no pre-existing safety issues that any future proposals are likely to exacerbate.

3. Sustainability Assessment

3.1 Introduction

This section of the report examines the sustainability of the site by highlighting the surrounding walking, cycling and public transport infrastructure, whilst identifying how these sustainable modes of transport connect to the surrounding key services and facilities.

3.2 Walking and Cycling Accessibility

Walking and cycling form sustainable modes of transport which not only provide benefits to residents but help to reduce the amount of congestion and pollution within the area.

It is generally considered that a 2km walking catchment (25-minute journey) is an acceptable distance to travel to work or nearby facilities and amenities. It is acknowledged that this distance is subjective and will vary based on an individual's personal mobility and fitness, and will be influenced by their perception and prejudices on factors such as local topography and attitude towards travel modes.

The Department for Transport's (DfT's) Manual for Streets (MfS) guidance document notes that whilst "*walkable neighbourhoods*" should have a range of facilities within 800m (a 10-minute walk), this is not regarded as the upper limit for walking journeys and that walking offers the greatest potential to replace short car trips, particularly those under 2km.

Cycling also provides the opportunity as a substitute for a short car journey, with the CIHT document, *Planning for Cycling*, stating:

'The majority of cycling trips are for short distances, with 80% being less than five miles (8km) and with 40% being less than two miles. However, many trips by all modes are also short distances (67% are less than five miles, and 38% are less than two miles); therefore, the bicycle is a potential mode for many of these trips (DfT, 2014a).'

With regards to walking, Gibbet Hill Road affords a footway along the northern side of the carriageway within the vicinity of the site. This footway is of a suitable standard and provides direct connections to the University of Warwick (circa 650m north-west) and Woodfield Primary School (circa 1.0km south-east). In addition, the site benefits from access to the wider Public Right of Way (PRoW) network to the west and south of the site, affording traffic free access towards Kenilworth, and is situated within proximity of several recreational routes through Tocil Wood and Nature Reserve situated immediately north of the site.

As such, the site is considered to be highly accessible, with well-connected pedestrian infrastructure that links to local services, facilities and the PRoW network. A 25-minute walking catchment and the available PRoW's within the vicinity of the site is illustrated within **Figure 3.1** below.

Figure 3.1 2km, 25-Minute Walking Isochrone

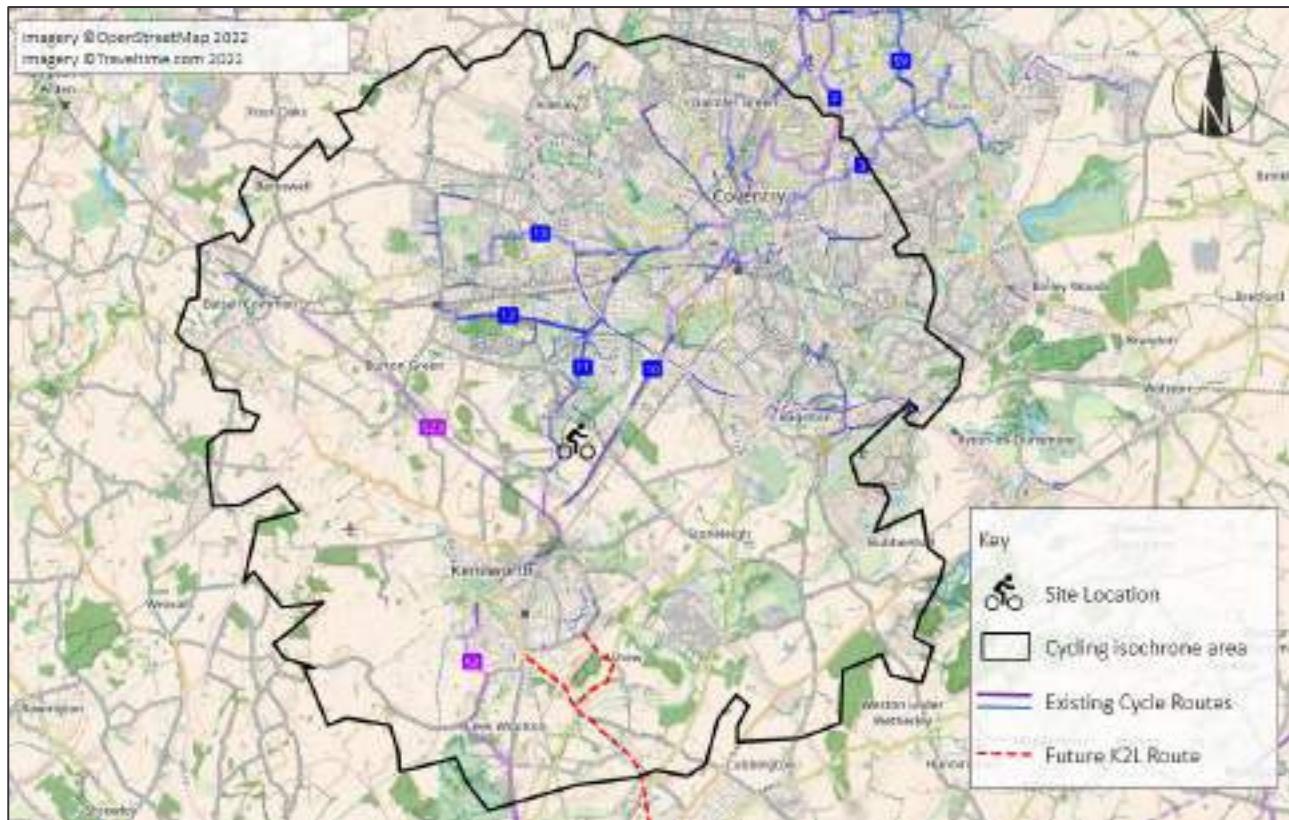


With regard to cycling, it is generally considered that an 8km isochrone is an acceptable (30-minute journey) distance to travel to work or nearby facilities and amenities by bicycle.

National Cycling Network route (route 52) routes immediately west of the site into Coventry City Centre (via NCR 11) to the north (circa. 20 minutes / 5.5km) and Kenilworth to the south (circa. 12 minutes / 3.7km). Such cycle routes provide accessible, sustainable and efficient transport links into and around Coventry City as well as towns and villages in Warwickshire such as Kenilworth.

All cycling links, along with a 30-minute cycling isochrone radius are illustrated in **Figure 3.2** below.

Figure 3.2 Cycling isochrone of 30-minute Cycling Isochrone, including cycling network routes



As can be gauged from **Figure 3.2**, the site is situated within close proximity of several comprehensive cycle corridors, which route north through the University of Warwick campus, as well as the A429 towards Coventry City Centre, and south into Kenilworth, where access to the future K2L route will be afforded, which will provide an enhanced cycle connection between Kenilworth and Leamington Spa.

3.3 Local Services and Facilities

The site is well situated to benefit from access to a number of local services and facilities which can be undertaken by sustainable modes of transport. The proposed site's accessibility has been judged against the institute of Highways and Transportation (IHT) '*Guidelines for providing for Journeys on Foot*' (2000) in relation to acceptable walking distances to services and facilities.

Table 3.1 provides a summary of the desirable, acceptable, and preferred maximum walking distance to local community facilities and services.

Table 3.1 Recommended Accessibility Thresholds

	Town Centre	Commuting/School	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1,000m	800m
Preferred Maximum	800m	2,000m	1,200m

Source: IHT (2000), *Guidelines for Providing Journeys on Foot*, IHT, London

Given the site is situated within close proximity to the University of Warwick and Cannon Park Employment Area, there are a number of services and facilities available to any future occupiers of the site.

Table 3.2 provides a summary of the accessible services and facilities available.

Table 3.2 Walkable Services and Amenities from Proposed Site

Service/Amenity	Distance	Walking Time	Threshold Classification
Tocil Wood and Nature Reserve	400m	5-minute	Acceptable
University of Warwick	650m	8-minute	Acceptable
Pret A Manger	650m	9-minute	Acceptable
Cryfield Sports Pavilion	650m	9-minute	Acceptable
Rootes Grocery Store	800m	10-minute	Acceptable
Woodfield Primary School	1.0km	14-minute	Acceptable
Sports and Wellness Hub	1.1km	14-minute	Acceptable
Cannon Park Employment Area (Tesco Superstore, Boots Pharmacy, Subway, Sports Direct, etc)	1.7km	21-minute	Preferred Maximum
Cannon Park Shopping Centre	1.7km	21-minute	Preferred Maximum
Bishop Ullathorne Catholic School	2.8km	35-minute	Preferred Maximum

It can be seen from **Table 3.2** that the site is well located to benefit from a number of services and facilities which are within a desirable and acceptable walking distance. This will reduce future residents' dependence on car journeys and helps to promote sustainable transportation.

In addition to those services and facilities deemed to be with an acceptable walking distance, there is an additional facility, which is situated just outside of these thresholds but is considered to be within a reasonable walking distance, namely Bishop Ullathorne Catholic School. The location of the aforementioned and the services and facilities outlined in **Table 3.2** are illustrated within **Figure 3.3**.

Figure 3.3 Local Services and Facilities



3.4 Public Transport

Bus Services

There are several bus services within proximity of the site, with the closest located on Gibbet Hill Road less than 100m from the site. The westbound bus stop is marked with a flagpole, timetable, a raised kerb and clear way markings and the eastbound bus stop is marked with a flagpole, shelter with seating, timetable and a raised kerb.

Table 3.3 provides a summary of the bus stops within the vicinity of the site, along with routes and frequency.

Table 3.3 Summary of Local Bus Services

Bus stop	Service	Route	Peak Frequency	First Bus	Last Bus
Gibbet Hill Campus	11	Coventry – Leamington Spa	20 minutes	06:15	00:15
		University of Warwick – Coventry	8 minutes	06:47	22:57
Gibbet Hill Campus	512	Hampton-in-Arden – Stratford Girl's Grammar Schl	School service	-	-
	U1	Warwick Gates – University of Warwick	30 minutes	00:06	23:40

Bus stop	Service	Route	Peak Frequency	First Bus	Last Bus
	U1V	Warwick Gates – University of Warwick	30 minutes	18:04	23:10
	U1A	Warwick Gates – University of Warwick	30 minutes	06:39	19:45
	U1AV	Warwick Gates – University of Warwick	30 minutes	06:39	19:34
	12X	University of Warwick – Coventry	8 minutes	06:49	22:58
Gibbet Hill/Stoneleigh Rd (Kenilworth Road)	17	Coventry – Warwick	School service	-	-
	X17	Warwick – Coventry	30 minutes	05:43	21:00
	11	Leamington Spa - Coventry	20 minutes	05:55	01:12
	14	Eastern Green – Coventry	20 minutes	06:20	23:22
University Interchange Bus stop	14A	Coventry – University of Warwick	20 minutes	06:18	09:38
	60	Arena Retail Park – Warwick University	Hourly	07:08	21:07

Source <https://bustimes.org/services/60-arena-retail-park-warwick-university>

As can be gauged from **Table 3.3** the local bus stops provide access to well established, comprehensive bus services, which afford access to key local destinations including Coventry (17-minute journey time), Leamington Spa (20-minute journey time), Kenilworth (9-minute journey time) and Warwick (47-minute journey time).

Train Services

The closest train station to the site is Canley (circa. 3.8km to the north). The station provides 94 car parking spaces, which are free of charge, and 28 cycle storage spaces covered by CCTV. The station also has direct bus links with waiting rooms and seating areas available. Canley station runs approximately two trains per hour each way towards Birmingham New Street northbound and London Euston via Northampton southbound.

Kenilworth station is located circa. 4.8km to the south of the site. The station provides 65-70 car parking spaces, a waiting room, and cycle storage. An hourly service runs southbound to Leamington Spa and northbound to Nuneaton via Coventry.

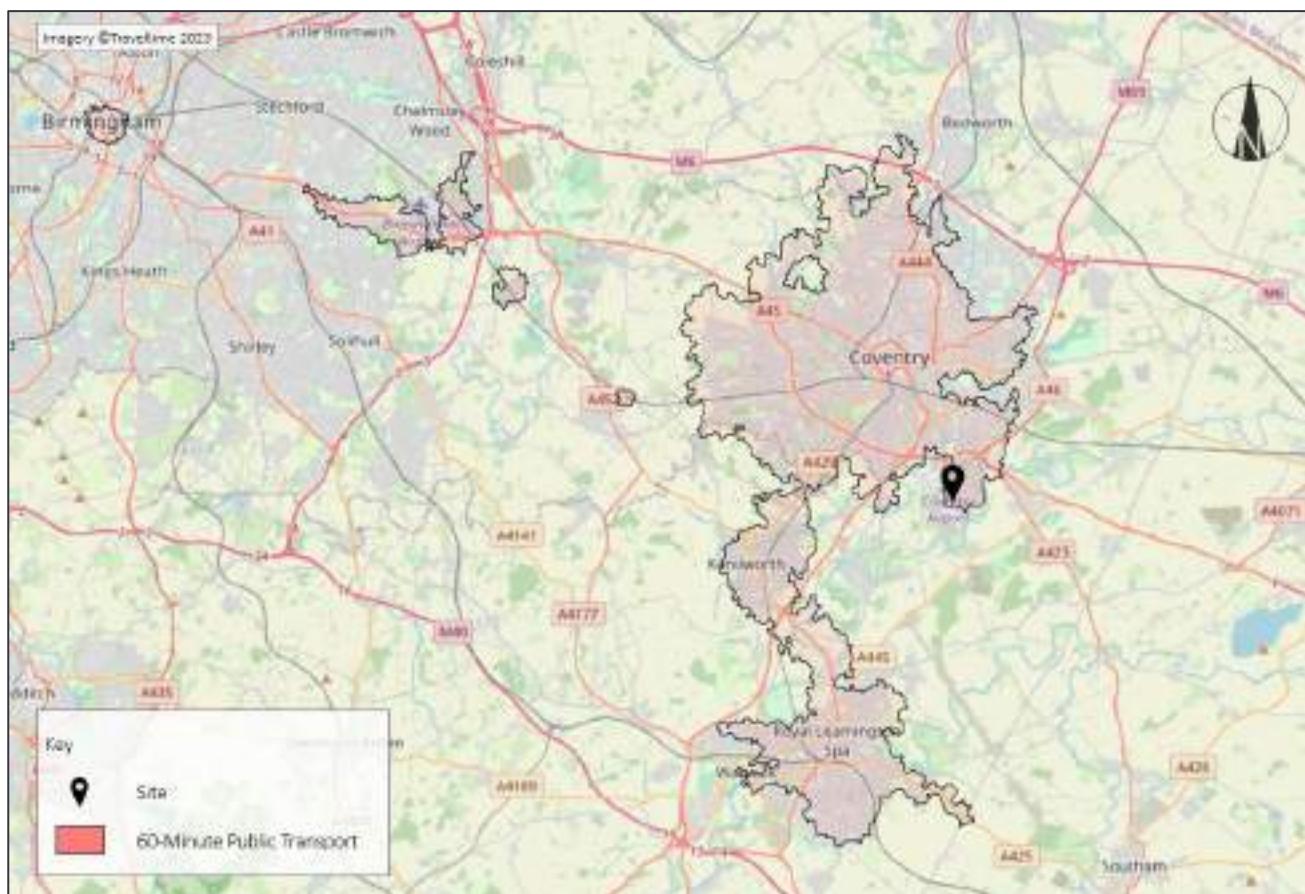
Coventry station is located circa. 5km northeast of the site. The station provides two parking facilities totalling 470 car spaces combined, and 120 cycle storage spaces, all of which are under CCTV surveillance. The station runs several services across the country which follow as:

- Six trains per hour to London Euston
- Seven trains per hour to Birmingham New Street
- One train per hour to Bournemouth

- One train per hour to Manchester Piccadilly
- One train per hour to Liverpool
- One train per hour to Rugeley Town
- One train per hour to Blackpool North or Edinburgh Waverly
- One train per hour to Nuneaton
- One train per hour to Leamington Spa

As can be gauged from information above, the site is situated within proximity of frequent and reliable rail services, which provide access to a number of local and national destinations. As a result, it can be concluded that the site would have excellent access to rail services via Kenilworth, Canley and Coventry station. **Figure 3.4** illustrates the public transport connectivity from the site for a 1-hour travel time (inclusive of connecting bus services to nearby stations such as the 12x to Coventry and the 11 to Canley Kenilworth).

Figure 3.4 60-minute Public Transport Isochrone



- The site is situated within a 5-minute walk of existing bus services, which serve the immediate and wider area. The close proximity and well-connected bus services would allow for future site occupiers to commute efficiently and more sustainably towards Coventry, Kenilworth and Leamington Spa, as well Birmingham.
- Access to three well-connected rail stations within 5km would afford future site occupants with onwards travel to several key local and regional destinations.

4. Development Proposals

4.1 Introduction

This chapter of the report describes the development proposals, including indicative details of internal road layout, access, parking, and servicing arrangements.

4.2 Development Description

It is anticipated that the site could deliver up to 500 residential dwellings. In order to accommodate a development of this scale, the following design aspects have been considered:

- A new four arm roundabout junction, which accords with WCC's Design Guide and the Design Manual for Roads and Bridges (DMRB) '*CD 116: Geometric design of roundabouts*';
- New footway links along the southern edge of Gibbet Hill Road to tie in with existing signalised crossing;
- Cycle connections to NCR 52, via a separate dedicated access to the south-west of the site.
- Cycle connections onto Cryfield Grange Road towards local cycle routes on Kenilworth Road; and
- Tactile paved dropped kerb crossings at pedestrian desire lines along the new access road junctions.

It is acknowledged that the highway network to the north of the site is management and maintained by CCC and it will therefore be appropriate to refine the main access design in consultation with CCC. However, since the site itself is within Warwickshire, it is assumed that the WCC Design Guide is applicable.

A plan illustrating a concept layout of the site is provided in [Appendix A](#).

4.3 Access to the Development

Vehicular Access Options

Access into the site could be taken from either Gibbet Hill Road or Cryfield Grange Road. However, as noted in [Section 2.2](#), Cryfield Grange Road is a narrow two-way carriageway with a width of circa. 3.5m in places. Any access granted via this road would require significant carriageway widening in order to accommodate two-way movements to / from the site, which is not deemed feasible given the proximity to neighbouring residential properties and lack of available highway land.

Gibbet Hill Road is a wide all-purpose carriageway, which bounds the site along its northern frontage. It is considered that there is sufficient frontage available to accommodate the proposed roundabout junction to serve a development of this scale in a safe and effective manner to meet the required design criteria, and as such this has been selected as the preferred option.

Vehicular Access Design

Given that Gibbet Hill Road is subject to a 40mph speed limit, the design of any access junction along this carriageway will be subject to the design criteria outlined within DMRB's CD 116 guidance document (as referenced in [Section 4.2](#) above).

The following design criteria from CD 116 have been selected:

- ICD of 45m,
- Entry widths of 4.5m on site access arms and 7.0m on Gibbet Hill Road arms.
- Exit widths of 6.0m on site access arms and 7.0m on Gibbet Hill Road arms.
- Forward visibility of 120m for junction entries.
- Entry radii between 10m and 20m.
- Exit radii between 20m and 40m.

It should be noted that whilst the access design is considered to be fully DMRB complaint, the final junction form will need to be scoped and agreed with WCC and CCC as the respective highway authorities. A copy of the design is included within **Appendix B**.

Internal Road Design

In line with the WCC Design Guide (Part 3), a development quantum of up to 500 dwellings would require provision of a 'Type 4a: Link Road / Tertiary Road (Type 1)', and subject to the following design standards:

- Two connected points of vehicular access.
- Road width of 5.5m (localised widening may be required subject to swept path analysis).
- 20mph speed limit (TRO required).
- Junction visibility splays of 2.4m x 25m.
- Minimum footway widths of 2m on both sides of the road.
- Verge / service margin widths of 2m.

As previously acknowledged, the site is situated on the Warwickshire / Coventry boundary and as such, the access junctions will need to be agreed by CCC, with due consideration of their highway design guide. However, for the site internals, it is expected that WCC will require the application of their highway design guide, alongside appropriate references to Manual for Streets and the forthcoming Manual for Streets 3.

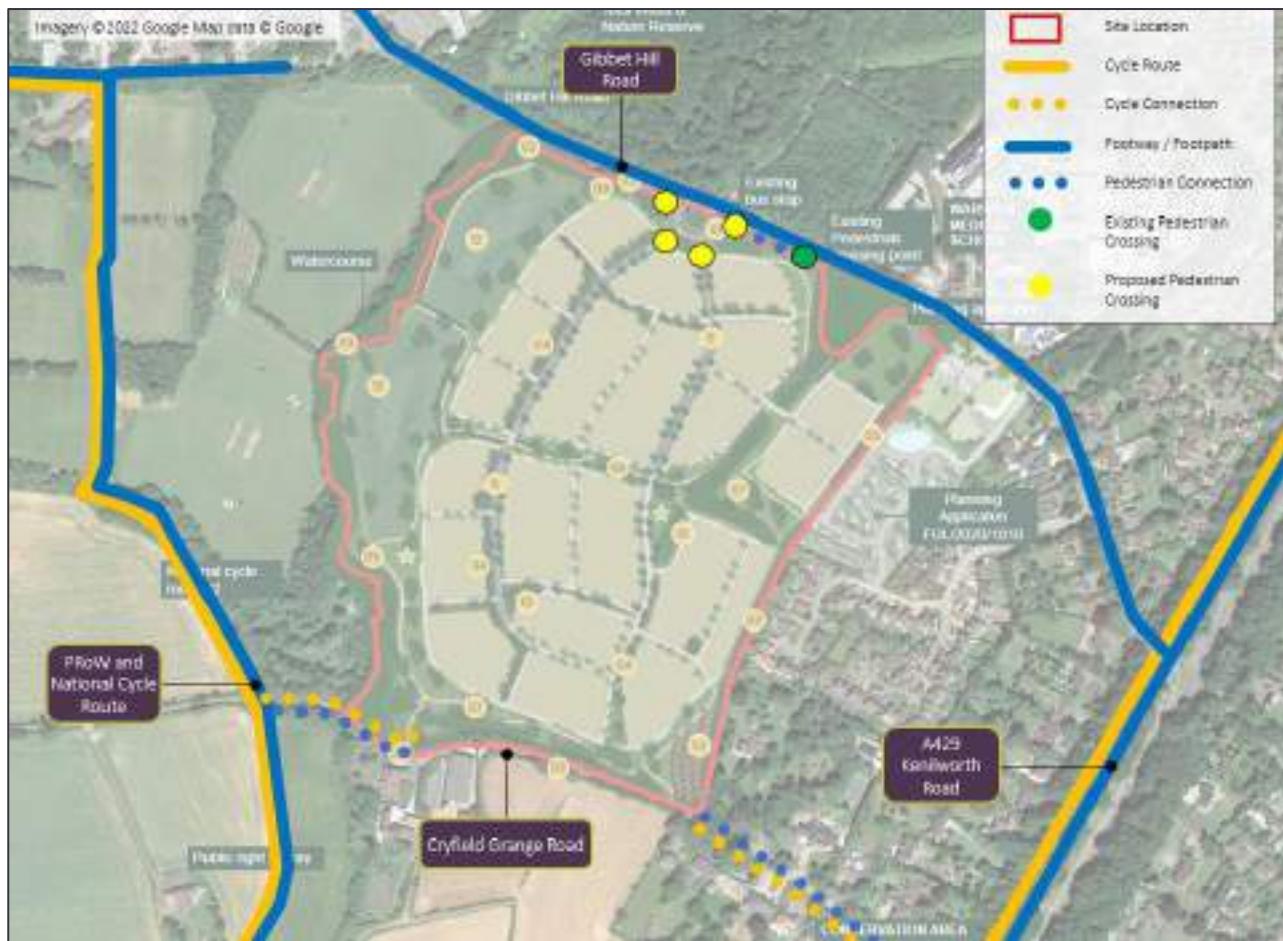
Pedestrian / Cycle Access

To support the proposed allocation, footways would be introduced along the southern side of Gibbet Hill Road, within the site frontage. These would connect the principal points of access with the existing westbound bus stop and the existing signal-controlled crossing, which in turn would afford access onto the existing footway network.

The provision of roundabout junction affords an opportunity to introduce pedestrian crossings on all junction arms and ensure nearby desire lines are well catered for.

There is also an opportunity to provide a pedestrian connection with the Connect2 Kenilworth walking/cycling route to the west, and a pedestrian / cycle connection on the southern boundary with Cryfield Grange Road, to enable convenient access to the footway/cycleway on Kenilworth Road to the east. These options are illustrated in **Figure 4.1** below.

Figure 4.1 Potential Pedestrian / Cycle Access



Public Transport Access

Regarding public transport access, there are two bus stops on Gibbet Hill Road which benefit from frequent existing bus services, as is identified in **Table 3.3**.

There are opportunities to upgrade existing bus service facilities, particularly the westbound stop on Gibbet Hill Road, which is currently only in the form of a flagged pole with service timetable.

4.4 Parking Provision

Parking standards for new development are outlined in Warwick District Council Guidance (2011-2029) for vehicle and cycle parking. There guidance states the following requirements:

- ▶ 1 bed – 1 vehicle and 1 cycling parking space.
- ▶ 2 bed – 2 vehicles and 2 cycling parking spaces.
- ▶ 3 bed – 2 vehicles and 3 cycling parking spaces.
- ▶ 4+ bed – 3 vehicle spaces and 1 cycling space per bedroom.

The mix of the development is unknown at this stage and the prescribed standards will be adhered to within the development.

4.5 Conclusion

It has been demonstrated that a safe and suitable vehicular access can be achieved in line with applicable local and national design standards.

The development proposal can be seamlessly integrated with existing walking, cycling and public transport infrastructure, which is comprehensive, extensive and high quality. The proposed integration will ensure future residents are afforded a real opportunity to travel sustainably for work, education and leisure purposes.

5. Traffic Impact

5.1 Traffic Generation

To gauge the level of traffic movements that could be generated by the proposed development quantum, a trip rate assessment has been undertaken using the industry standard TRICS (Trip Rate Information Computer System) database. TRICS is a nationally recognised database of traffic surveys covering a multitude of different development types.

Trip rate data has been extracted from the latest version of the TRICS database for 03 'Residential' – A 'Houses Privately Owned' to determine the likely traffic generation for the proposed development site. It is noted that there will be affordable housing provided on the site, however in order to present a robust and therefore worst-case assessment, this traffic impact assessment only takes into account private dwellings as these will present a higher trip rate, and therefore greater traffic generation.

The following survey selection parameters were utilised:

- The regions of Greater London, Scotland, Wales, Northern Ireland, Republic of Ireland removed.
- Population within a mile (actual – 36,336), range used 1,000 – 50,000;
- Population within 5 miles (actual – 296,033), range used 5,000 – 500,000;
- Surveys conducted for sites between 100-750 Dwellings.
- Surveys conducted in 'Suburban Area', 'Edge of Town' and 'Residential Zone' locations.
- Surveys conducted between Monday-Friday.
- Surveys conducted from 2015-2020.

Full and detailed TRICS outputs are provided in **Appendix C** with a summary of the trip rates and likely traffic generation that could be generated by the existing site outlined in **Table 5.1** below.

Table 5.1 Trip Rates and Traffic Generation for Proposed Site

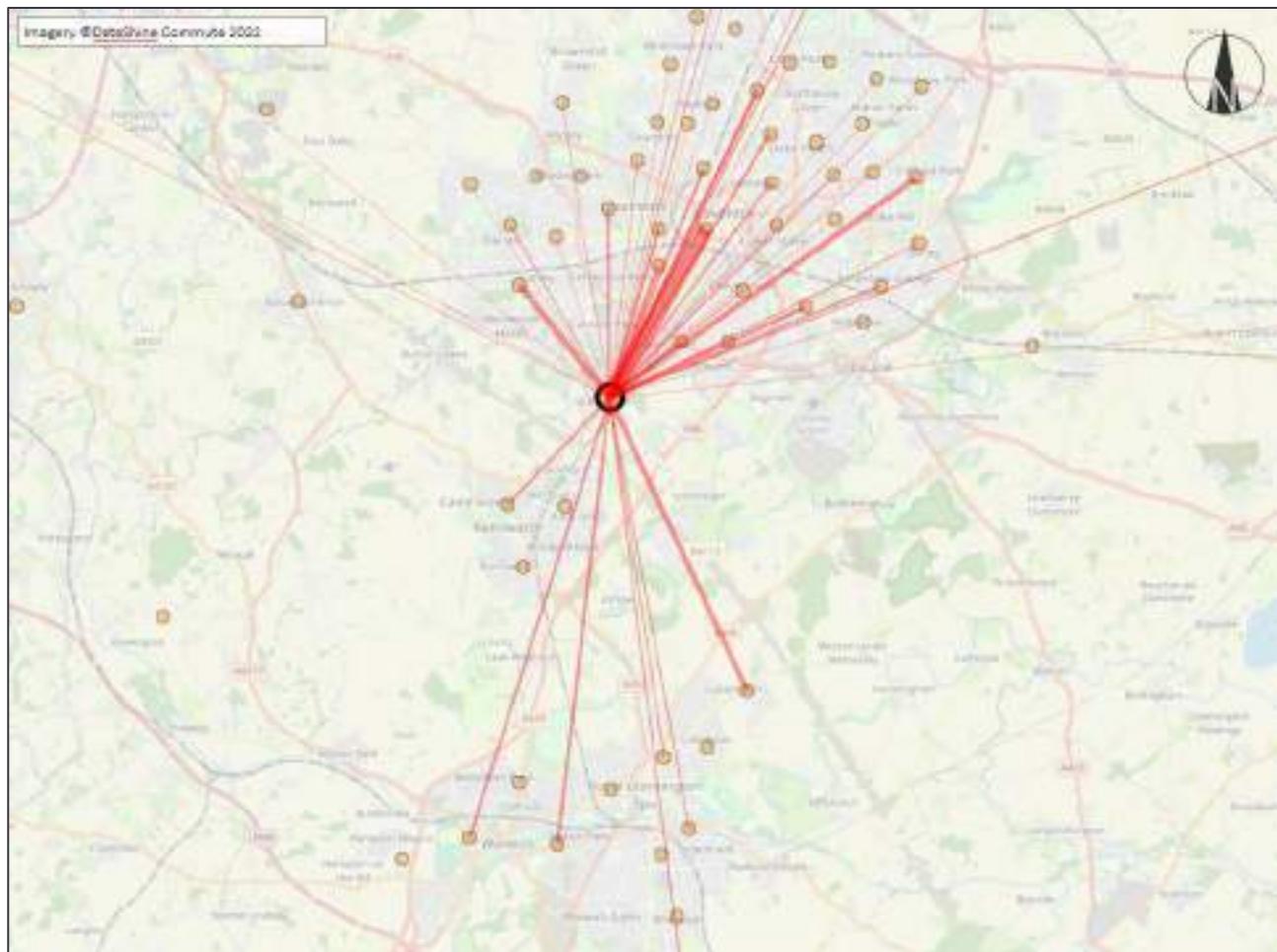
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
	Trip Rate			Proposed Trip Generation (500 dwellings)		
AM Peak (08:00 – 09:00)	0.127	0.384	0.511	64	192	256
PM Peak (17:00 – 18:00)	0.363	0.152	0.515	182	76	258
Daily	2.325	2.322	4.647	1,163	1,161	2,324

As outlined in **Table 5.1** the site could result in 256 and 258 two-way movements in the respective AM and PM peak hours, and 2,324 daily two-way trips.

5.2 Traffic Distribution

A traffic distribution assessment has been undertaken to assess existing commuter trends for the area surrounding the site. 'Datashine: Census', a mapping platform for the key 2011 Census variables in England and Wales, has been utilised to show the distribution of car drivers travelling to work. This exercise is illustrated in **Figure 5.1** below.

Figure 5.1 Car Journeys to Work



Based on the above, it is evident that Coventry is the main draw for commuters, with other destinations being Kenilworth and the wider Leamington Spa area.

Taking the above into account, it is considered that the main commuter route for vehicles travelling to / from the site will be via the A429 Kenilworth Road and the A46, both of which route on a northeast to southwest alignment to the east of the site.

Notwithstanding the above, it should be acknowledged that the commuting patterns and mode of travel from the site location are representative of the past census and given the quality of the sustainable and active travel network, which serves the site, the key destinations can all be accessed via several alternate means of travel.

5.3 Existing Highway Conditions

In order to understand the existing congestion on the local road network, specifically the A429 Kenilworth Road, typical traffic data has been extracted from Google Maps for the AM and PM peak hour periods. **Figures 5.2 and 5.3** below illustrate these congestion levels, with the colours representing the following:

- **Green** - no congestion.
- **Amber** - light congestion.
- **Red** – slow moving traffic.
- **Heavy Red** – heavy congestion.

Figure 5.2 Local Highway Conditions – AM Peak Hour

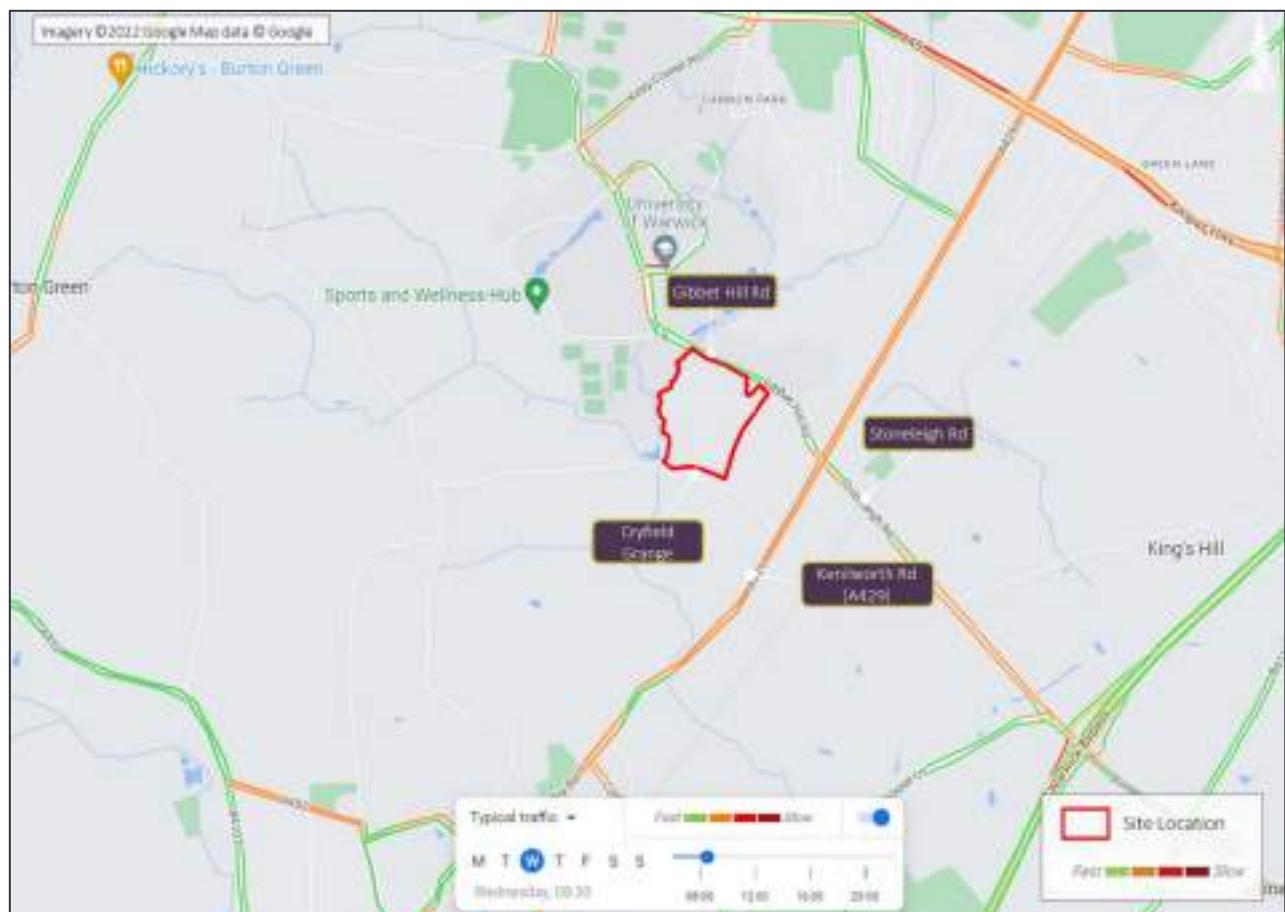
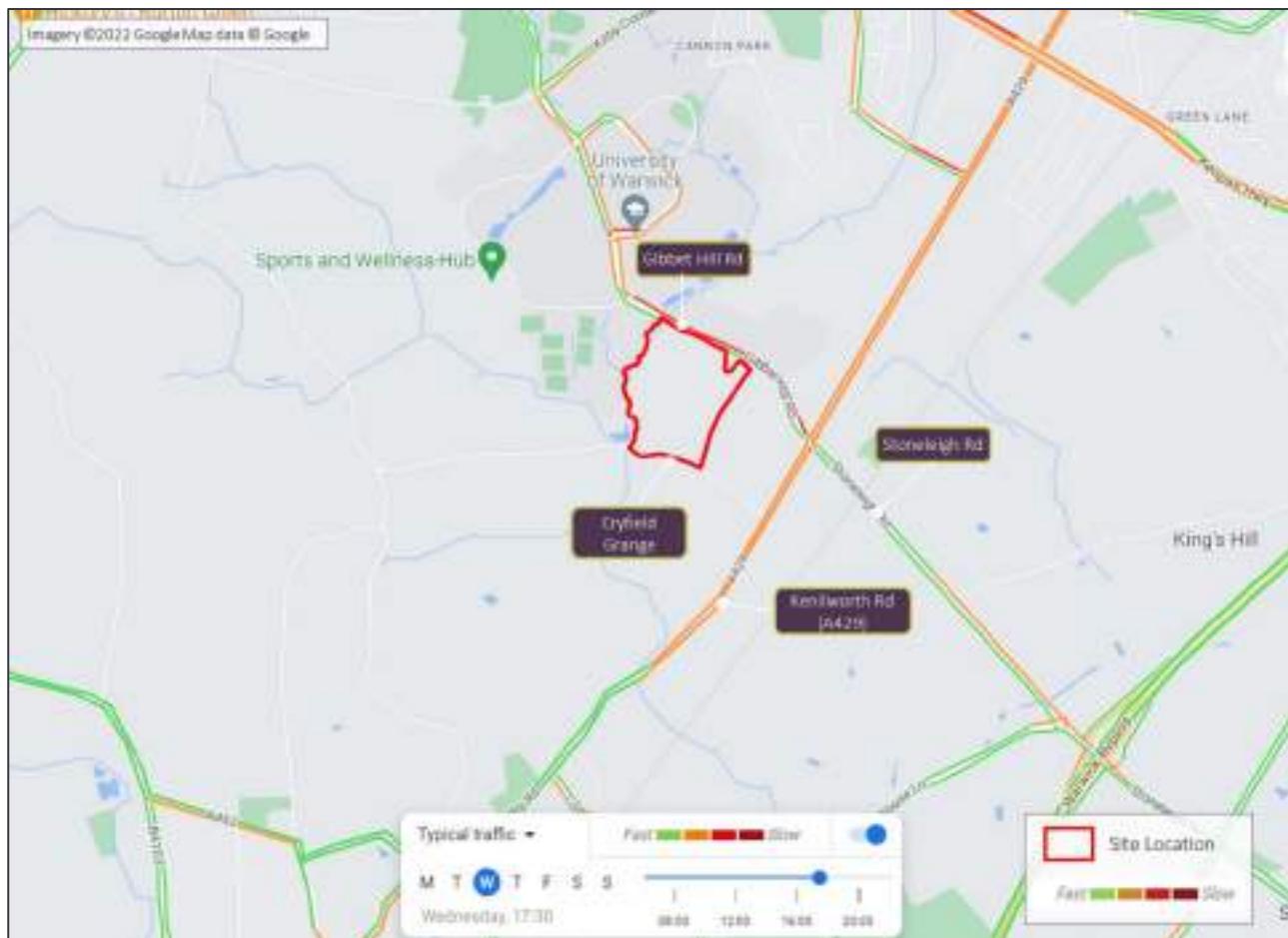


Figure 5.3 shows that there is evidence of light congestion along the A429 on the approach to the roundabout with Gibbet Hill Road / Stoneleigh Road during the AM peak hour.

The A429 is an important local distributor and in keeping with its primary function, traffic flows, whilst significant, are well catered for as evidenced by the lack of any heavy congestion. The site would also benefit from alternate routes toward the Coventry to the west, which shows none, or light congestion, and towards the east via the A46, which shows no congestion during the morning peak period.

Figure 5.3 Local Highway Conditions – PM Peak Hour



In keeping with the AM peak, **Figure 5.4** shows similar levels of light traffic congestion along the A429, and some slow-moving traffic along Gibbet Hill Road eastbound, most likely associated with the University. However, the site itself would mostly attract arrivals returning home and travelling westbound along Gibbet Hill Road and therefore unlikely to result in any significant capacity issues.

Notwithstanding the above, there may be opportunities to stagger traffic flows along Gibbet Hill Road as part of the access strategy, should junction modelling demonstrate a requirement for such measures.

5.4 Major Infrastructure Upgrades and Future Travel Initiatives

Whilst the impacts on the local highway are unlikely to be categorised as being ‘severe’, it should be noted that an improvement scheme at A46 / Stoneleigh Road junction is currently being constructed. This scheme has been designed to accommodate future growth within the area, and it is forecast that this will result in a 41% and 47% reduction in delay during the AM and PM peak hours respectfully between 2013 and 2034. **Figure 5.4** below illustrates the proposed mitigation.

Figure 5.4 Proposed A46 / Stoneleigh Road Junction Mitigation



Source (<https://api.warwickshire.gov.uk/documents/WCCC-1068-788>)

In addition to the above, Coventry City Council are currently investigating methods to improve access to sustainable transport in a bid to assist in achieving the West Midlands target of net-zero carbon emissions by 2030.

A pilot e-scooter scheme, implemented by Voi Technology, is being trialled at the University of Warwick, with aspirations to grow the scheme further and serve the wider Coventry area. There is an opportunity for the proposed development to tie in with this scheme, potentially providing on-site e-scooter storage, contributing to the future growth.

In addition, the Council is also introducing 'Coventry Very Light Rail (CVLR)', which aims to connect the city centre to major local employment areas, of which could be beneficial to future residents.

It will be necessary to fully consider how the site could integrate with forthcoming initiatives at the application stage and ensure appropriate connectivity is afforded that would reduce reliance on private car ownership. This approach and the types of initiatives being promoted, align with the 'decide and provide' method that is being widely adopted by local authorities as a means to minimise the level of highway improvement required to support development in favour of supporting sustainable alternatives.

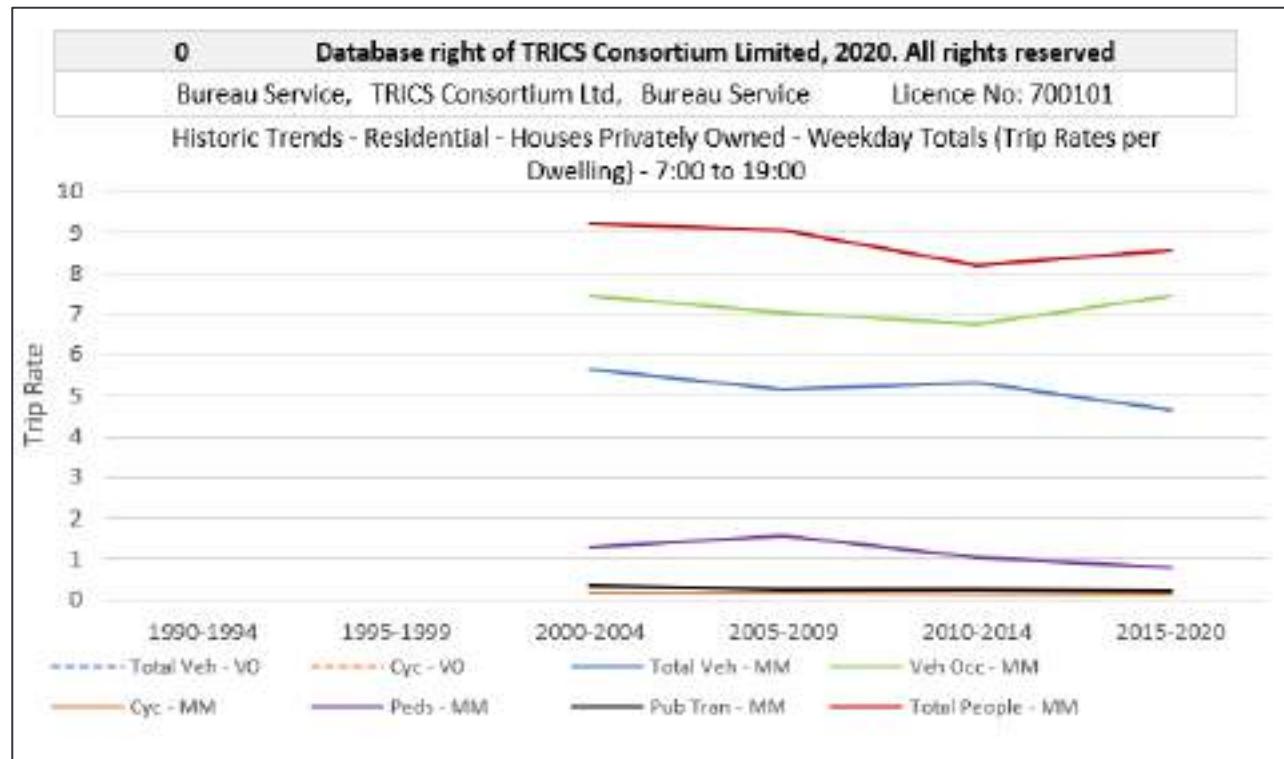
The impacts of 'decide and provide' has been examined by the TRICS consortium and consideration of existing and future trends is provided within **Section 5.5**.

5.5 Decide and Provide Guidance

The TRICS Consortium Limited (TRICS) has conducted research into evolving travel behaviour and trends as a result of the significant change in relation to social, technological, economic and environmental drivers which, in turn, is creating new dynamics in travel behaviour and challenges for transport planning.

An exercise has been conducted using the TRICS Historic Trends tool to identify likely changes in travel behaviour based on observations over the last 20 years. The results are displayed in **Figure 5.5** below.

Figure 5.5 Daily Trip Rate for Multi-modal Transport – between 2000-2020



The above demonstrates that over the last 20 years the total people trip rate has decreased by approximately 6%, and the total vehicle trip rate has decreased by 18%. This trend has been sparked by a rise in home working, lifestyle choices, online shopping and improvements in travel behaviour awareness, which has been heavily promoted over this period.

Given the push for sustainable transport and the need to meet climate change goals nationwide, there is justification to suggest that the trip rate per household over the next twenty-year period is likely to continue on this downward trajectory. As a result, the application of 'decide and provide' will have a significant bearing on a future planning application.

5.6 Traffic Impact

Based on the evidence presented, it is considered that the proposed allocation site is unlikely to result in a significant impact on the local highway network. Existing commuter trends and traffic data suggest that there is sufficient capacity to accommodate an increase in traffic movements during the peak hours, and local mitigation schemes are being implemented to benefit further. The excellent location of the site means that future residents would have access to well-connected sustainable transport links that can be utilised on a daily basis. Also, data extracted from TRICS suggests that vehicle trip rates are reducing year-on-year, and there is no reason to suggest this trend will not continue given the sites proximity to a comprehensive footway, footpath, cycle way and public transport network.

Notwithstanding the above, it will be appropriate to consider traffic generation and distribution in further detail at the application stage in consultation with the local authorities.

6. Summary and Conclusions

6.1 Summary

This Transport and Highways Technical Note has been prepared to support the promotion of a residential development of up to 500 dwellings on land to the south of Gibbet Hill Lane, Coventry.

In summary:

- A review of the local highway network has revealed that there were no outstanding highway safety issues.
- There are sufficient pedestrian footways surrounding the proposed site for residents to access local services and facilities, PRoW's, and cycling routes for recreational purposes and sustainable modes of transport.
- A number of local services and facilities are located within walking distance of the site, which could be utilised by future residents.
- Bus stops are situated within close proximity and provide access to frequent services towards Coventry, Kenilworth, and Leamington Spa.
- Three train stations are within a 5km radius of the site and afford onwards travel towards Birmingham, Nuneaton, Leamington Spa, and London.
- A 'safe and suitable' access arrangement has been designed to comply with design guidance identified within DMRB CD 116 and the WCC Design Guide.
- Appropriate connections to the existing footway and cycleway network can be provided to ensure future residents would have excellent opportunities to travel sustainably.
- The anticipated traffic generation has been established using the industry standard TRICS database to create a robust estimate of the vehicle trip rate and generation from the site. It has also been evidenced that there is a general decline in vehicle trip generation from residential developments and with the advent of forthcoming sustainable initiatives being promoted by the Council, it is likely the traffic generation potential of the site and the resultant impact on the local highway network would not be significant nor severe.

6.2 Conclusions

As a result of the evidence presented throughout this document, it is considered that the site and local highways network could accommodate the scale of the proposed development quantum and should be considered for inclusion within the new Local Plan for WDC and SDC.

Appendix A

Illustrative Layout



- 01 Proposed vehicular access point (most likely in the form of a roundabout)
- 02 Potential pedestrian and cycle connection points
- 03 Retained/enhanced boundary hedgerows
- 04 Green corridor routes throughout development
- 05 Proposed public open space which could include community gardens/allotments, orchard planting, naturalistic young children's play spaces and meadow planting
- 06 Central green corridor, reinstating historic hedgerow alignment
- 07 Development pulled back from countryside edge
- 08 Pedestrian, cycle and emergency access
- 09 Indicative pumping station location
- 10 Village green
- 11 Primary access road
- 12 Sustainable drainage system (SuDS)
- 13 Orchard planting

■ Proposed footpath/cycle connections

★ Children's play spaces

CLIENT: _____
L&Q Estates

PROJECT: _____
Land at Gibbet Hill Road

DRAWING: _____
Illustrative Masterplan

PROJECT NUMBER: _____
1388

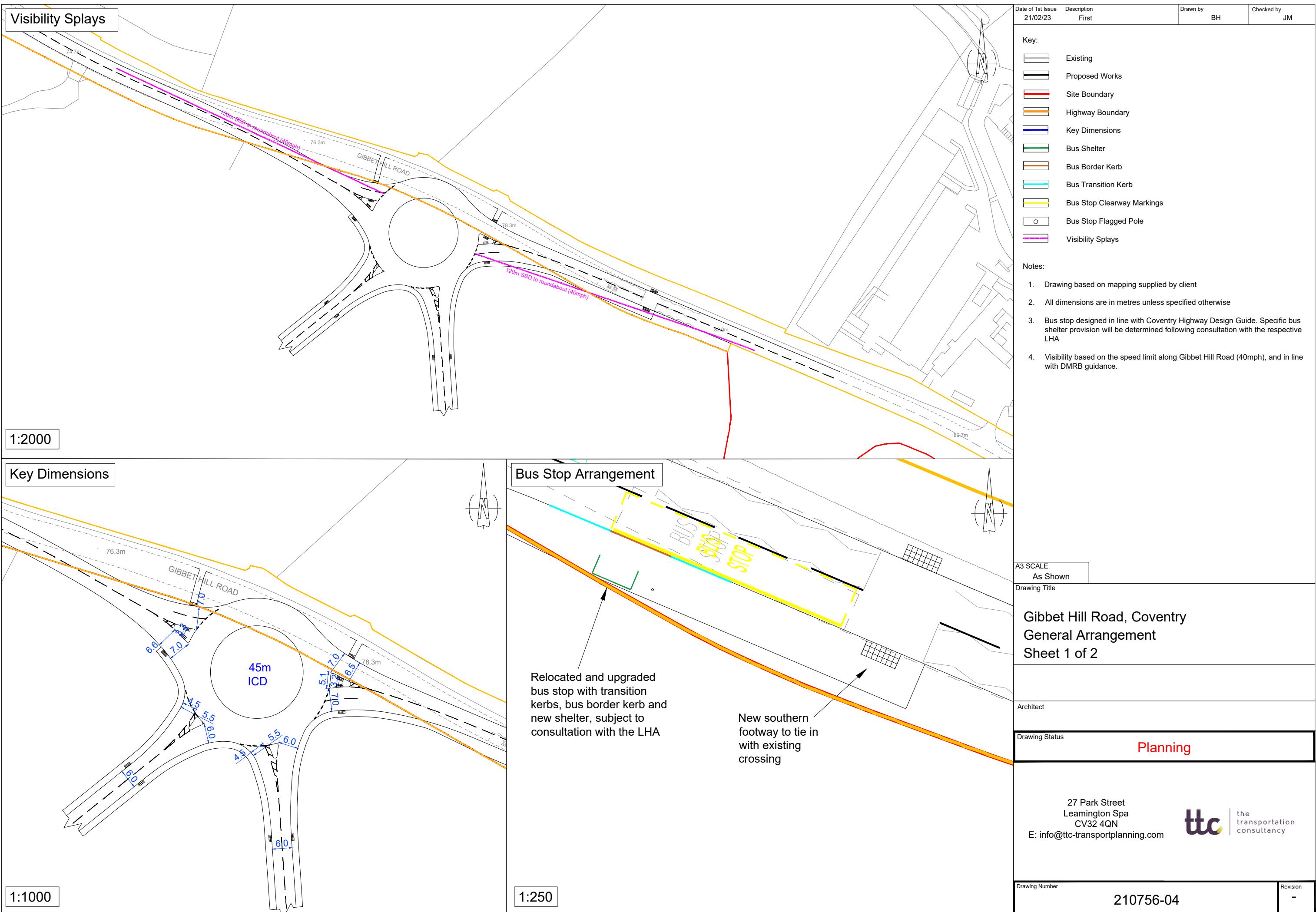
DRAWING NUMBER: _____
002 CHECKED BY: _____
SR

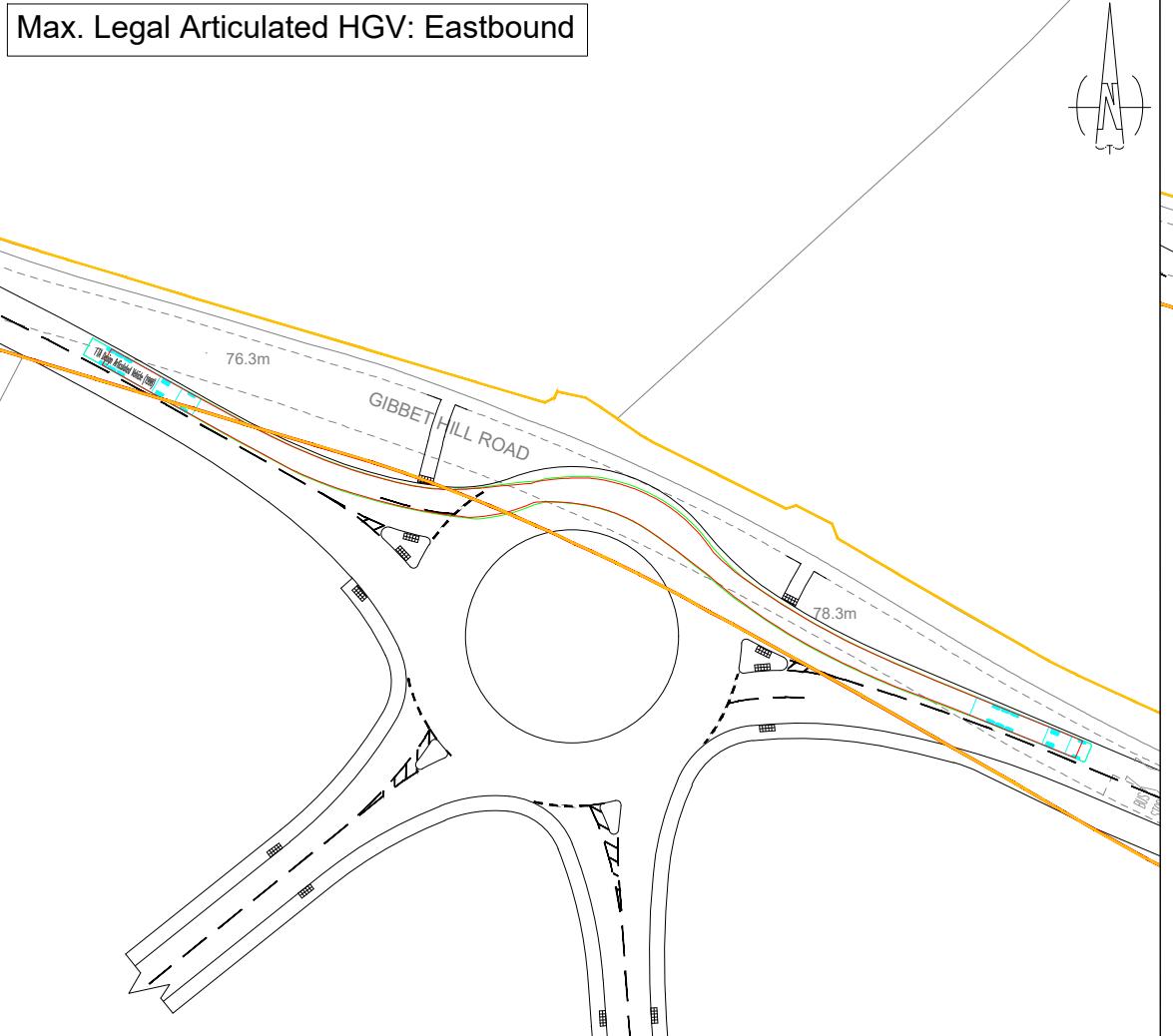
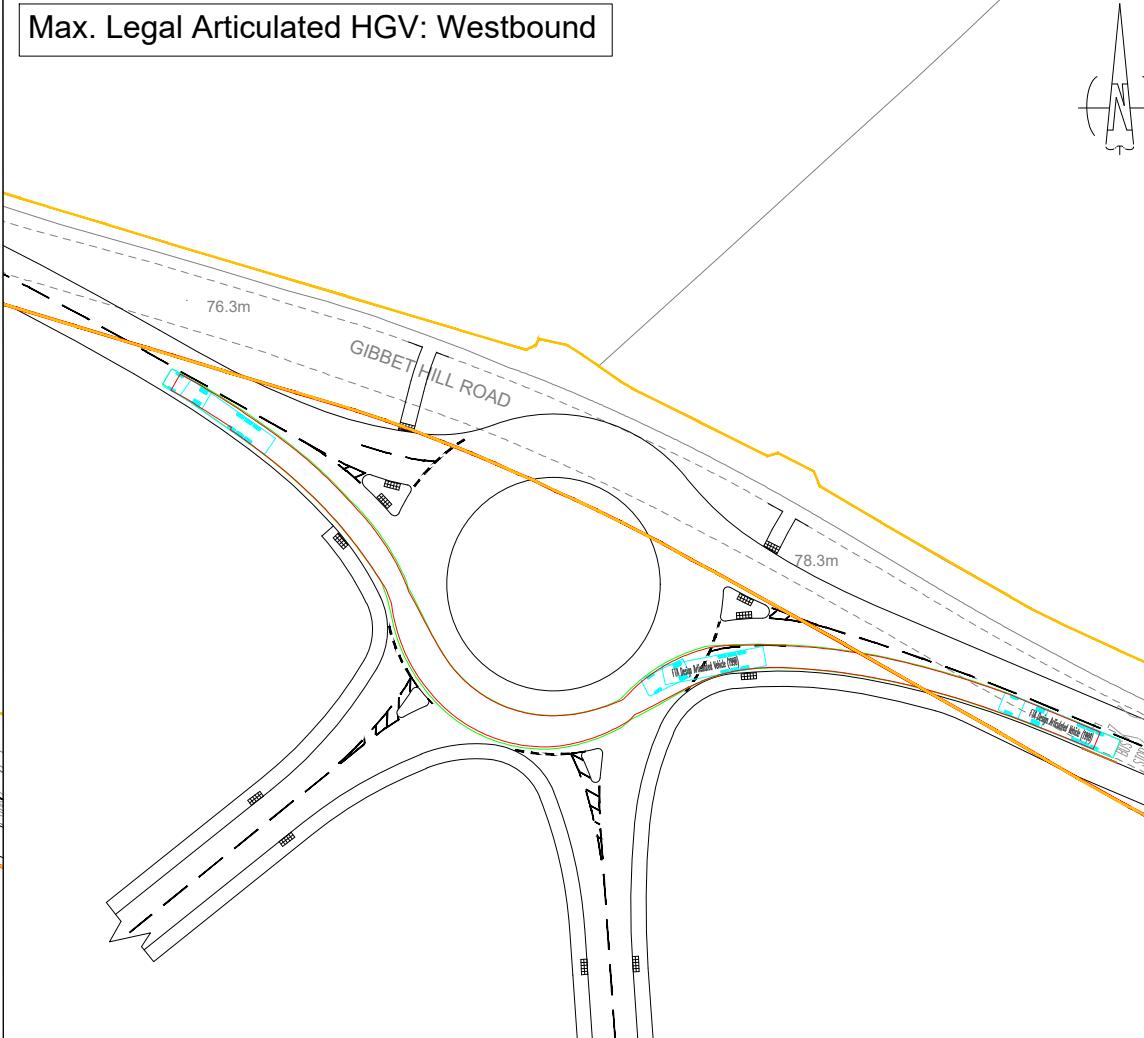
REVISION: _____
V1 STATUS: _____
Issue

DATE: _____
02/03/2023 SCALE: _____
NTS

Appendix B

Access Design



Max. Legal Articulated HGV: Eastbound

Max. Legal Articulated HGV: Westbound


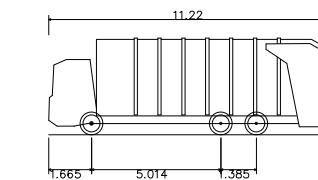
Date of 1st Issue 21/02/23 Description First Drawn by BH Checked by JM

Key:

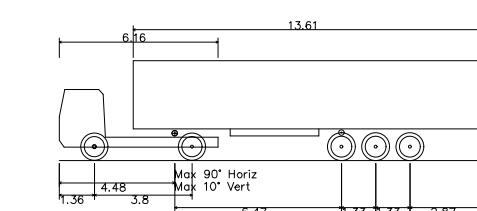
- Existing
- Proposed Works
- Site Boundary
- Highway Boundary
- Vehicle Wheels
- Vehicle Body

Notes:

1. Drawing based on mapping supplied by client
2. All dimensions are in metres unless specified otherwise



Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis)
 Overall Length 11.220m
 Overall Width 2.530m
 Overall Body Height 3.756m
 Min Body Ground Clearance 0.309m
 Track Width 2.530m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 11.550m



FTA Design Articulated Vehicle (1998)
 Overall Length 16.480m
 Overall Width 2.550m
 Overall Body Height 3.870m
 Min Body Ground Clearance 0.515m
 Max Track Width 2.470m
 Lock to lock time 3.00s
 Kerb to Kerb Turning Radius 6.550m

A3 SCALE
1:1000

Drawing Title

Gibbet Hill Road, Coventry
 Swept Path Analysis
 Sheet 2 of 2

Architect

Drawing Status

Planning

27 Park Street
 Leamington Spa
 CV32 4QN
 E: info@ttc-transportplanning.com

ttc the
transportation
consultancy

Drawing Number

210756-04

Revision

-

Appendix C

TRICS Output

Calculation Reference: AUDIT-154301-230216-0255

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	2 days
	HF HERTFORDSHIRE	1 days
	KC KENT	3 days
	SC SURREY	1 days
	WS WEST SUSSEX	2 days
03	SOUTH WEST	
	DV DEVON	1 days
04	EAST ANGLIA	
	NF NORFOLK	1 days
05	EAST MIDLANDS	
	DY DERBY	1 days
06	WEST MIDLANDS	
	ST STAFFORDSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 110 to 371 (units:)
 Range Selected by User: 100 to 750 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 31/12/20

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	4 days
Tuesday	1 days
Wednesday	3 days
Thursday	2 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	13 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	2
Edge of Town	11

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	11 days - Selected
Servicing vehicles Excluded	2 days - Selected

Secondary Filtering selection:

Use Class:

C3	13 days
----	---------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,000 or Less	1 days
5,001 to 10,000	3 days
10,001 to 15,000	5 days
15,001 to 20,000	2 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	3 days
50,001 to 75,000	2 days
75,001 to 100,000	2 days
125,001 to 250,000	6 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	8 days
1.6 to 2.0	2 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	5 days
No	8 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	13 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	DV-03-A-02 MILLHEAD ROAD HONITON	HOUSES & BUNGALOWS	DEVON
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	116	
	Survey date: FRIDAY	25/09/15	Survey Type: MANUAL
2	DY-03-A-01 RADBOURNE LANE DERBY	MIXED HOUSES	DERBY
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	371	
	Survey date: TUESDAY	10/07/18	Survey Type: MANUAL
3	ES-03-A-03 SHEPHAM LANE POLEGATE	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	212	
	Survey date: MONDAY	11/07/16	Survey Type: MANUAL
4	ES-03-A-04 NEW LYDD ROAD CAMBER	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	134	
	Survey date: FRIDAY	15/07/16	Survey Type: MANUAL
5	HF-03-A-03 HARE STREET ROAD BUNTINGFORD	MIXED HOUSES	HERTFORDSHIRE
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	160	
	Survey date: MONDAY	08/07/19	Survey Type: MANUAL
6	KC-03-A-04 KILN BARN ROAD AYLESFORD DITTON	SEMI-DETACHED & TERRACED	KENT
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	110	
	Survey date: FRIDAY	22/09/17	Survey Type: MANUAL
7	KC-03-A-06 MARGATE ROAD HERNE BAY	MIXED HOUSES & FLATS	KENT
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	363	
	Survey date: WEDNESDAY	27/09/17	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

8	KC-03-A-07 RECULVER ROAD HERNE BAY	MIXED HOUSES	KENT
	Edge of Town Residential Zone		
	Total No of Dwellings:	288	
	Survey date: WEDNESDAY	27/09/17	Survey Type: MANUAL
9	NF-03-A-06 BEAUFORT WAY GREAT YARMOUTH BRADWELL	MIXED HOUSES	NORFOLK
	Edge of Town Residential Zone		
	Total No of Dwellings:	275	
	Survey date: MONDAY	23/09/19	Survey Type: MANUAL
10	SC-03-A-05 REIGATE ROAD HORLEY	MIXED HOUSES	SURREY
	Edge of Town Residential Zone		
	Total No of Dwellings:	207	
	Survey date: MONDAY	01/04/19	Survey Type: MANUAL
11	ST-03-A-07 BEACONSIDE STAFFORD MARSTON GATE	DETACHED & SEMI-DETACHED	STAFFORDSHIRE
	Edge of Town Residential Zone		
	Total No of Dwellings:	248	
	Survey date: WEDNESDAY	22/11/17	Survey Type: MANUAL
12	WS-03-A-08 ROUNDSTONE LANE ANGMERING	MIXED HOUSES	WEST SUSSEX
	Edge of Town Residential Zone		
	Total No of Dwellings:	180	
	Survey date: THURSDAY	19/04/18	Survey Type: MANUAL
13	WS-03-A-09 LITTLEHAMPTON ROAD WORTHING WEST DURRINGTON	MIXED HOUSES & FLATS	WEST SUSSEX
	Edge of Town Residential Zone		
	Total No of Dwellings:	195	
	Survey date: THURSDAY	05/07/18	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

The Transportation Consultancy 397 Birmingham Road Redditch

Licence No: 154301

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Total People to Total Vehicles ratio (all time periods and directions): 1.85

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	220	0.081	13	220	0.325	13	220	0.406
08:00 - 09:00	13	220	0.127	13	220	0.384	13	220	0.511
09:00 - 10:00	13	220	0.142	13	220	0.175	13	220	0.317
10:00 - 11:00	13	220	0.126	13	220	0.156	13	220	0.282
11:00 - 12:00	13	220	0.129	13	220	0.143	13	220	0.272
12:00 - 13:00	13	220	0.159	13	220	0.150	13	220	0.309
13:00 - 14:00	13	220	0.163	13	220	0.149	13	220	0.312
14:00 - 15:00	13	220	0.173	13	220	0.185	13	220	0.358
15:00 - 16:00	13	220	0.260	13	220	0.164	13	220	0.424
16:00 - 17:00	13	220	0.281	13	220	0.163	13	220	0.444
17:00 - 18:00	13	220	0.363	13	220	0.152	13	220	0.515
18:00 - 19:00	13	220	0.321	13	220	0.176	13	220	0.497
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		2.325			2.322				4.647

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter summary

Trip rate parameter range selected:	110 - 371 (units:)
Survey date date range:	01/01/15 - 31/12/20
Number of weekdays (Monday-Friday):	13
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL CYCLISTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	220	0.005	13	220	0.007	13	220	0.012
08:00 - 09:00	13	220	0.009	13	220	0.014	13	220	0.023
09:00 - 10:00	13	220	0.000	13	220	0.002	13	220	0.002
10:00 - 11:00	13	220	0.002	13	220	0.003	13	220	0.005
11:00 - 12:00	13	220	0.003	13	220	0.005	13	220	0.008
12:00 - 13:00	13	220	0.004	13	220	0.005	13	220	0.009
13:00 - 14:00	13	220	0.002	13	220	0.001	13	220	0.003
14:00 - 15:00	13	220	0.003	13	220	0.003	13	220	0.006
15:00 - 16:00	13	220	0.006	13	220	0.005	13	220	0.011
16:00 - 17:00	13	220	0.013	13	220	0.009	13	220	0.022
17:00 - 18:00	13	220	0.013	13	220	0.008	13	220	0.021
18:00 - 19:00	13	220	0.008	13	220	0.009	13	220	0.017
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		0.068			0.071				0.139

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLE OCCUPANTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	220	0.102	13	220	0.513	13	220	0.615
08:00 - 09:00	13	220	0.168	13	220	0.718	13	220	0.886
09:00 - 10:00	13	220	0.194	13	220	0.274	13	220	0.468
10:00 - 11:00	13	220	0.172	13	220	0.240	13	220	0.412
11:00 - 12:00	13	220	0.182	13	220	0.231	13	220	0.413
12:00 - 13:00	13	220	0.239	13	220	0.225	13	220	0.464
13:00 - 14:00	13	220	0.250	13	220	0.228	13	220	0.478
14:00 - 15:00	13	220	0.251	13	220	0.277	13	220	0.528
15:00 - 16:00	13	220	0.478	13	220	0.260	13	220	0.738
16:00 - 17:00	13	220	0.512	13	220	0.264	13	220	0.776
17:00 - 18:00	13	220	0.619	13	220	0.233	13	220	0.852
18:00 - 19:00	13	220	0.535	13	220	0.291	13	220	0.826
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		3.702			3.754				7.456

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PEDESTRIANS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	220	0.011	13	220	0.022	13	220	0.033
08:00 - 09:00	13	220	0.029	13	220	0.068	13	220	0.097
09:00 - 10:00	13	220	0.030	13	220	0.033	13	220	0.063
10:00 - 11:00	13	220	0.025	13	220	0.033	13	220	0.058
11:00 - 12:00	13	220	0.023	13	220	0.030	13	220	0.053
12:00 - 13:00	13	220	0.032	13	220	0.024	13	220	0.056
13:00 - 14:00	13	220	0.024	13	220	0.022	13	220	0.046
14:00 - 15:00	13	220	0.019	13	220	0.030	13	220	0.049
15:00 - 16:00	13	220	0.064	13	220	0.039	13	220	0.103
16:00 - 17:00	13	220	0.052	13	220	0.031	13	220	0.083
17:00 - 18:00	13	220	0.042	13	220	0.019	13	220	0.061
18:00 - 19:00	13	220	0.036	13	220	0.042	13	220	0.078
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		0.387			0.393				0.780

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP* FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL PUBLIC TRANSPORT USERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	220	0.002	13	220	0.019	13	220	0.021
08:00 - 09:00	13	220	0.001	13	220	0.032	13	220	0.033
09:00 - 10:00	13	220	0.002	13	220	0.012	13	220	0.014
10:00 - 11:00	13	220	0.003	13	220	0.005	13	220	0.008
11:00 - 12:00	13	220	0.003	13	220	0.006	13	220	0.009
12:00 - 13:00	13	220	0.003	13	220	0.005	13	220	0.008
13:00 - 14:00	13	220	0.004	13	220	0.005	13	220	0.009
14:00 - 15:00	13	220	0.004	13	220	0.003	13	220	0.007
15:00 - 16:00	13	220	0.023	13	220	0.009	13	220	0.032
16:00 - 17:00	13	220	0.019	13	220	0.007	13	220	0.026
17:00 - 18:00	13	220	0.016	13	220	0.005	13	220	0.021
18:00 - 19:00	13	220	0.020	13	220	0.006	13	220	0.026
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		0.100			0.114			0.214	

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/ TRP* FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Total People to Total Vehicles ratio (all time periods and directions): 1.85

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	220	0.120	13	220	0.561	13	220	0.681
08:00 - 09:00	13	220	0.207	13	220	0.832	13	220	1.039
09:00 - 10:00	13	220	0.227	13	220	0.321	13	220	0.548
10:00 - 11:00	13	220	0.203	13	220	0.281	13	220	0.484
11:00 - 12:00	13	220	0.211	13	220	0.271	13	220	0.482
12:00 - 13:00	13	220	0.277	13	220	0.259	13	220	0.536
13:00 - 14:00	13	220	0.280	13	220	0.256	13	220	0.536
14:00 - 15:00	13	220	0.278	13	220	0.314	13	220	0.592
15:00 - 16:00	13	220	0.571	13	220	0.312	13	220	0.883
16:00 - 17:00	13	220	0.596	13	220	0.311	13	220	0.907
17:00 - 18:00	13	220	0.690	13	220	0.265	13	220	0.955
18:00 - 19:00	13	220	0.599	13	220	0.347	13	220	0.946
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		4.259			4.330				8.589

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Appendix 7 Ecological Constraints and Biodiversity Net Gain Feasibility Report



ENVIRONMENT

L and Q Estates Ltd
Land at Gibbet Hill Road
Coventry
Ecological Constraints and Biodiversity
Net Gain Feasibility Report

ENVIRONMENT

L and Q Estates Ltd
Land at Gibbet Hill Road
Coventry
Ecological Constraints and Biodiversity
Net Gain Feasibility Report

Birmingham
Livery Place, 35 Livery Street, Colmore Business District, Birmingham, B3 2PB
T: 0121 233 3322

Leeds
Whitehall Waterfront, 2 Riverside Way, Leeds
LS1 4EH
T: 0113 233 8000

London
11 Borough High Street
London, SE1 9SE
T: 0207 407 3879

Manchester
11 Portland Street, Manchester, M1 3HU
0161 233 4260

Nottingham
Waterfront House, Station Street, Nottingham NG2 3DQ
T: 0115 924 1100

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P02	March 2023	S2	Minor amendments made by Sarah Stone MSc BSc (Hons) MCIEEM		

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EXECUTIVE SUMMARY

This Ecological Constraints and Biodiversity Net Gain Feasibility Report has been undertaken on behalf of Land Q Estates Ltd in respect of the Site at Gibbet Hill Road, Coventry. It has been produced to inform the Client of any ecological constraints present on the Site and to provide the feasibility of providing Biodiversity Net Gain at the Site and outline details of the baseline Biodiversity Net Gain score.

The habitat within the Site was dominated by arable crop with minimal grass margins ranging from 1 - 5m in width and hedgerows around the perimeter of the Site. Woodland adjacent to the Site's western boundary and the hedgerow along the northern boundary provided direct connectivity with the LNR/LWS to the north, as did the watercourse along the western boundary. Hedgerows around the Site would qualify as Priority Habitats and these habitats should ideally be retained within the masterplan.

One designated site, a SSSI, was located within 2km of the Site boundary. As the development type (residential) is included within a risk category, further consultation with Natural England regarding potential impacts and mitigation is required.

The Site is considered suitable to have potential to support great crested newts, roosting bats, foraging and commuting bats, badgers, riparian mammals and hedgehogs, as well as the occasional passage of reptiles. Further surveys for bats, great crested newts, riparian mammals and badgers were recommended. Good working practices should be enforced to protect the surrounding habitats and species and there are options for ecological enhancement through installation of bird and bat boxes and hedgehog connectivity.

The Site was assessed against the Natural England Biodiversity Metric 3.1. No irreplaceable habitats were found and the Site's baseline habitat score of 64.43 was primarily accrued from the arable field, due to its large size. A baseline hedgerow score of 7.38 units was present. Retention of woodland, hedgerows and scrub, as well creation of wildflower grassland, ponds, scrub and scattered trees would minimise any biodiversity loss on the Site and would be appropriate for this location.

Overall, no significant impacts are anticipated as a consequence of development. Furthermore, it is anticipated that a net gain will be achievable at the Site, subject to detailed design and a suitable landscaping scheme.

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APPENDICES

- Appendix 1: Relevant Legislation
- Appendix 2: UK Habitat Classification Site Plan
- Appendix 3: Photographs

1. INTRODUCTION

Instruction

1.1 This Ecological Constraints and Biodiversity Net Gain Feasibility Report has been undertaken on behalf of L and Q Estates Ltd in respect of the Site at Gibbet Hill Road, Coventry. It has been produced to inform the Client of any ecological constraints present on the Site and to provide the feasibility of providing Biodiversity Net Gain at the Site and outline details of the baseline Biodiversity Net Gain score.

Site Description

1.2 The Site is located on the south-western outer edge of the city of Coventry in the West Midlands. The Site itself comprises an arable field with mature hedgerows and trees. The Site is approximately 23.77 hectares (ha) in extent and is centred on grid reference SP 30136 75109. The land is flat with a gentle slope down towards the western boundary.

1.3 The location of the Site is shown below in **Figure 1.1**.



Figure 1.1: Site Location Plan

The Project

2.1 The current proposals for the Site are for a residential development. However, at present the Site is at feasibility stage, with a view to exploring the option of gaining allocation through the South Warwickshire Plan.

Objectives

- 1.4 The purpose of this report is to identify any potential ecological constraints relating to any future development proposals at the Site and will include recommendations for further ecological surveys, if required.
- 1.5 The report will also provide a feasibility assessment of achieving biodiversity net gain at the Site, as well as provide the results of the biodiversity net gain condition assessments and baseline habitat score for the Site.

Scope of Works

- 1.6 The ecological appraisal was informed by a Site survey. The approach to this report follows best practice published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2019; 2021) and the British Standards Institution (BSI, 2013). Further details are provided later in this report.

Legislation and Planning Policy

- 1.7 The following legislation relates to species and habitats that could potentially occur in association with the Site:
 - The Environment Act (2021);
 - The Conservation of Habitats and Species Regulations 2017 (as amended);
 - The Wildlife and Countryside Act 1981 (as amended);
 - The Countryside and Rights of Way (CROW) Act 2000;
 - Natural Environment and Rural Communities (NERC) Act 2006;
 - The Protection of Badgers Act 1992;
 - Wild Mammals (Protection) Act 1996; and
 - The Hedgerow Regulations 1997.
- 1.8 Further information on the legislation relevant to this Site is provided in **Appendix 1**.
- 1.9 Consideration has also been given in this report to relevant National and Local Planning Policy as summarised below.
- 1.10 The National Planning Policy Framework (NPPF) guides Local Planning Authorities (LPAs) when developing their planning policies and considering planning applications affecting protected habitats, sites and species.
- 1.11 In respect of the natural environment, the NPPF states under Paragraph 170 that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

1.12 The NPPF also states under Paragraph 174 that:

"To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

1.13 Through the NPPF and Section 40 of the Natural Environment and Rural Communities (NERC) Act, LPAs have a duty to consider habitats and species listed as being of principal importance for nature conservation in England on Section 41 (S41) of the Act when considering a planning application. In addition, the biodiversity duty of local planning authorities also covers species and habitats listed in local biodiversity action plans.

1.14 Additionally, the Site lies within the jurisdiction of Warwick District Council and falls under the provisions of the Warwick District Local Plan (2011-2029). It is our understanding that this will be updated and replaced by the South Warwickshire Plan and it is likely that any future application for this Site would be made under the new plan. However, until that

time, it is useful to gain an understanding of existing policy with regards to ecology and biodiversity. The following provides a brief summary of existing policy:

"NE1 Green Infrastructure The Council will protect, enhance and restore the district's green infrastructure assets and strive for a healthy and integrated network for the benefit of nature, people and the economy.

NE2 Protecting Designated Biodiversity and Geodiversity Assets The Council will protect designated areas and species of national and local importance for biodiversity and geodiversity.

NE3 Biodiversity New development will be permitted provided that it protects, enhances and / or restores habitat biodiversity."

1.15 Currently, Biodiversity Net Gain is covered under Policy NE3, which states "*Development proposals will be expected to ensure that they lead to no net loss of biodiversity, and where possible a net gain, by means of an approved ecological assessment of existing site features and development impacts.*" However, given that the Environment Act 2021 will make a 10% gain compulsory for all planning applications determined after November 2023, it is likely that this scheme will need to deliver 10% and this will be reflected in any updated Local Plan.

2. METHODS

Consultation

2.1 Warwickshire Biological Records Centre was contacted to request records of any locally designated sites and/or protected species from the Site and land within a 2km radius. Records more than ten years old have been largely disregarded.

2.2 Information in the public domain was reviewed (Coventry City Council Planning Portal February 2023), relating to other planning applications in the area particularly relating to two dwellings on the north-eastern boundary of the Site. In addition, the data sources listed below were also searched to gather additional ecological data of relevance to the project, including the identification of non-designated ecologically sensitive habitats such as vegetation corridors, woodlands, watercourses and standing water.

- Multi-Agency Geographic Information for the Countryside (MAGIC);
- Ordnance Survey 1:25,000 mapping; and
- Aerial imagery (Google Earth– imagery dated 2023).

Site Survey

2.3 A Site survey was undertaken on 15th February 2023 by Sarah Stone MCIEEM and Adele Gorton. Sarah Stone has extensive experience in survey and site assessment for protected species and is appropriately qualified for the surveys based on the CIEEM competencies for species surveys (CIEEM, 2017). Sarah is registered to use Natural England (NE) class licences to survey for Great Crested Newts (GCN), barn owl *Tyto alba* and bats.

2.4 The visit was completed using UK Habitat Classification Survey techniques (Butcher et al; 2020).

2.5 During the survey data was collected on the habitat's conditions using the Natural England habitat condition assessment criteria (Natural England Joint Publication, 2022). The condition assessment criteria are dependent on the habitats present on-Site, with each assessment containing sets of criteria which are either passed or failed. Criteria include things such as species composition, presence of undesirable species and percentage cover.

2.6 This approach is considered to be standard practice to calculate the biodiversity value of the Site.

2.7 In addition, the methodology was extended to include an assessment of the Site habitats to support protected/notable fauna and search for incidental evidence any protected/notable fauna. Specific consideration was given to the following species:

- Birds;
- Bats;
- Amphibians, including great crested newts (GCN);

- Reptiles;
- Badgers *Meles meles*;
- Riparian mammals; and
- Priority Species, such as hedgehog *Erinaceus europaeus*.

2.8 Standard methodologies were used where applicable.

2.9 Habitats adjacent to the Site were viewed, where possible, from the Site boundaries in order to assess their potential to support protected species that could be utilising the survey Site.

2.10 The aim of the survey was to gather sufficient baseline information on the habitats within the Site in order to allow an interpretation of the ecological value of the land and to inform of any potential constraints to any future development relating to protected species.

Survey Comments

2.11 This report is not considered sufficient for submission with a planning application with its purpose solely to inform the Client of the ecological baseline of the Site and requirement for further protected species surveys. The survey methodology highlights habitats and features with potential for protected/notable species but is not designed to provide a comprehensive presence/absence survey.

2.12 In addition, a full biodiversity net gain assessment should also be undertaken utilising the latest version of the Natural England Biodiversity Metric. This can only be undertaken when full and final landscape details are known for the Site.

2.13 The survey was carried out in February which is outside of the recognised botanical growing season (May to September). A survey at this time of year is sufficient for an experienced surveyor to categorise the habitats and assess the potential for protected species to be present, in line with the aims of the survey.

2.14 In line with standard guidance, the results and recommendations within this report are valid for up to two years from the date of survey, assuming there are no significant changes to the survey Site or its immediate surroundings.

3. RESULTS

Designated Sites

- 3.1 There are seven statutory designated sites present within 5km of the Site boundary. The closest is Tilehill Wood SSSI, located approximately 4.4 km north-west of the Site. The Site falls into the SSSI risk zone for Tilehill Wood. The development type (residential) is within a risk category.
- 3.2 There are six Local Nature Reserves (LNR) within 5km of the Site. The closest location is Tocil Wood and Brookstray LNR, located adjacent to the mid-northern boundary of the Site.

Non- Statutory Sites

- 3.3 There are nine Local Wildlife Sites (LWS) within 2km of the Site and three Part LWS's (Part Local Wildlife Sites are sites where a particular area or 'part' of the Site has been given the designation, as it has been found to contain notable/protected species or habitats). Tocil Wood and Meadow is the closest LWS to the Site, located adjacent to the mid-northern boundary, encompassing areas of ancient woodland.
- 3.4 The southern boundary of this LWS is adjacent to the mid- northern boundary of the Site for approximately 133m.
- 3.5 Approximately a third of the Site on its northern extent falls under the National Habitat Network All Habitats Combined Network Enhancement Scheme 1.
- 3.6 One Woodland Trust site is located 50m to the north of the Site. This site is also part of the Woodland Grant Scheme 3.
- 3.7 There are eight Ancient and Natural Woodland Areas within 2km of the Site. The closest location to the Site is approximately 50m north within Tocil Wood and Meadow LNR/LWR. This area also falls under the National Habitat Network All Habitats Combined Ancient Woodland.
- 3.8 There are five Ancient and Replanted Woodlands within 2km of the Site. The closest location is approximately 0.8km west.
- 3.9 Located approximately 50m north of the Site is Priority Habitat Inventory- Deciduous Woodland.

Habitats and Botanical Species

Overview

- 3.10 The UK Habitat Classification Survey Results Map with Target Notes (TNs) is provided in **Appendix 2** with accompanying habitat descriptions below. Relevant photographs are shown in **Appendix 3**. Botanical species nomenclature follows Stace (2019).

3.11 The following habitats were present within the Site and along the Site boundaries.

Arable

3.12 The majority of the Site comprised an area dominated by agricultural, arable cropland, which was intensively managed.

Modified Grassland

3.13 Narrow field margins, up to a maximum of 5m in width, were present around the arable crop. These areas were overall species poor and <5cm in height. Species comprised predominantly perennial rye grass *Lolium perenne*, cock's-foot *Dactylis glomerata*, cleavers *Galium aparine*, common nettle *Urtica dioica* and cow parsley *Anthriscus sylvestris*, with occasional red dead nettle *Lamium purpureum*, germander speedwell *Veronica chamaedrys* and common chickweed *Stellaria media*.

3.14 The Biodiversity Metric 3.1 Condition Sheet Grassland Habitat Type (low distinctiveness) was used to assess the condition of the on-Site grassland. This condition sheet was used as on average there was only 4-5 species per m².

3.15 The grassland passed criteria 3, 4, 5, 6 and 7 and failed criteria 1 and 2. The grassland scored as poor condition as it failed essential criteria 1 which must be passed to achieve moderate or high condition.

Woodland

3.16 A small area of semi-mature woodland, 6- 8m in height, was located towards the north-east of the Site. This formed an L shape within the Site, segregating an area of the field in the north-eastern corner. The woodland was less than 10m in width with a relatively uniform age structure.

3.17 The woodland was directly connected to another block of woodland located outside the northern Site boundary.

3.18 **Table 3.1** provides a summary of the woodland including the BNG condition assessment scores.

Table 3.1: Woodland Descriptions and BNG Condition Assessment Scores

Hedgerow	Description	Condition Criteria	Condition Score
W1 – Native woodland	Intact woodland located along the north- east of the Site with silver birch <i>Betula pendula</i> , oak <i>Quercus robur</i> , hazel <i>Corylus avellana</i> , willow <i>Salix</i> sp., lime <i>Tilia cordata</i> , ash <i>Fraxinus excelsior</i> , holly <i>Ilex aquifolium</i> and common hawthorn <i>Crataegus monogyna</i> .	1. 1pt 2. 3pts 3. 3pts 4. 3pts 5. 3pts 6. 3pts 7. 1pt 8. 3pts 9. 1 pt 10. 2pts 11. 1pt	Moderate

Hedgerow	Description	Condition Criteria	Condition Score
		12. 1pt 13. 1pt Total score: 26	

Scrub

3.19 The Scrub identified on the Site was predominantly bramble *Rubus fruticosus*, located along the northern boundary, with a large dense area towards the north-western corner of the Site. Mixed scrub was also present between the buildings towards the south of the Site.

Pond

3.20 A pond was present at the time of the survey. This was located around a tree within the arable crop. The water was shallow, with limited aquatic vegetation. The banks were dominated by grassland species and low-level scrub.

3.21 The pond was assessed using the Habitat Suitability Index (HSI, Oldham *et. al.* 2000) and returned a score of 0.41 Poor Suitability for GCN.

Scattered Trees

3.22 Scattered trees were present on the northern, eastern and southern sections of the Site. One mature oak was identified on the west of hedgerow C on the woodland edge. One was identified growing within the pond near the north-west boundary and a third tree located north of the buildings. These trees were of various species. As these were isolated trees they do not fit the descriptions of either Line of Trees or Urban Trees. Given their rarity within the Site and the difficulties of classification, it was considered appropriate to discount them from any BNG measurements.

Bare Ground

3.23 A small area of bare ground was located along the Site's eastern boundary. From aerial photos it could be seen that this had previously been the site of a compound for the adjacent recent development scheme. At the time of this survey there was no vegetation within this area and it had a score of Poor Condition when assessed against the condition assessment criteria.

Hedgerows

3.24 A total of five hedgerows were present within the Site (labelled A-E on the Habitats Plan in **Appendix 2**) and a line of mature Leyland cypress trees *Cupressus x leylandii*. The hedgerows all had a broadly similar composition, being generally species-poor and dominated by either hawthorn or blackthorn *Prunus spinosa* with abundant bramble. The hedgerows would not qualify as Important under the Hedgerow Regulations.

3.25 Other species present included elder *Sambucus nigra*, field maple *Acer campestre*, elm *Ulmus* sp., ivy *Hedera helix*, dog rose *Rosa canina*, crab apple, *Malus sylvestris*, ash *Fraxinus excelsior* and holly *Ilex aquifolium*. No typical ground flora species were present, with the adjacent grassland field margins growing to the base of the hedgerows.

3.26 **Table 3.2** provides a summary of the hedgerows including the BNG condition assessment scores.

Table 3.2: Hedgerow Descriptions and Summary of BNG Condition Assessment Scores

Hedgerow	Description	Condition Criteria	Condition Score
HA- Native hedgerow with trees	Hedgerow along the northern-eastern boundary with hawthorn holly, oak, bramble, willow.	Pass: A1, C1, C2, D1, D2 Fail: A2, B1, B2 Total score: 5	Moderate
HB)- Native hedgerow	Hedgerow along the eastern boundary with hawthorn, bramble, ivy, dog rose, holly and elder.	Pass: A1, B1, B2, C1, C2, D1, D2 Fail: A2 Total score: 6	Good
HC- Native hedgerow with trees	Continuation of HA, growing around the woodland within the Site. Contained hawthorn, holly, oak, bramble, willow.	Pass: A1, C1, C2, D1, D2 Fail: A2, B1, B2 Total score: 5	Moderate
HD – Native hedgerow	Intact hedgerow along the north-western boundary with hawthorn, blackthorn <i>Prunus spinosa</i> and ivy, as well as occasional alder <i>Alnus glutinosa</i> and willow.	Pass: A1, B2, C1, C2, D1, D2, Fail: A2, B1 Total score: 6	Good
HE – Native hedgerow	Intact hedgerow located along the southern boundary with hawthorn, elder <i>Sambucus nigra</i> , bramble, ivy, dog rose <i>Rosa canina</i> , ash, holly and crab apple <i>Malus sylvestris</i> .	Pass: A1, B1, B2, C1, C2, D1, D2 Fail: A2, Total score: 6	Good

Buildings

There were five buildings located on the southern boundary. The location of the buildings in the south-western corner of the Site is shown in **Figure 3.1** below.



Figure 3.1: Building Location Plan

3.27 The buildings are described in more detail in relation to their potential to support protected species in the section below.

3.28 All buildings were old agricultural type buildings, with B1, B2 and B3 comprising large barns, with corrugated metal sheeting. B4 and B5 were garage type buildings with stone and brick work. B1, B2 and B3 were not accessed internally. B4 and B5 had open elevations so an internal view was taken, although full access was not made due to concerns over health and safety, with the buildings in poor condition with collapsing sections of roof.

Watercourse

3.29 A small tributary of the Canley Brook formed the western boundary of the Site. This was a flowing watercourse, less than 3m in width, with shallow water. It had earth banks (where these were visible) and flowed through an area of woodland.

Target Notes

3.30 The Target Notes identified onsite and shown in **Appendix 2** are detailed below:

- TN1- Single mammal hole of a size and shape consistent with use by badger but not appearing to be in regular use. Other snuffle holes and signs of digging were present in the vicinity of this hole.
- TN2- Two mammal holes were present, with a fresh badger latrine, indicating a likely badger sett.

- TN3- Main sett found within the woodland off-site and along the Site boundary. Multiple holes, fresh latrines and badger hair were located in this area. The majority of the sett was just outside of the Site boundary but did, in places, extend into the Site.
- TN4- Mammal hole identified along the woodland edge, considered likely to have been created by badger.
- TN5- Mammal hole of a size and shape consistent with badger found within the arable land, to the west of the woodland. Fresh digging identified.
- TN6- A mammal hole with bedding identified along the hedgerow on the northern boundary.
- TN7- Fresh badger latrine identified along the hedgerow on the eastern boundary,
- TN8- Badger latrine identified on the northern corner of the woodland.

Protected / Notable Species

Amphibians

3.31 There was one pond present on-Site and five ponds within 500m of the Site. A tributary of Canley Brook also ran adjacent to the western boundary of the Site. This would likely form a barrier to dispersal for any GCN beyond this watercourse, as flowing water is not typically suitable for GCN to cross. **Figure 3.2** below shows the approximate location of the waterbodies.

3.32 The terrestrial habitat within the Site offered some suitability for amphibians, including GCN, particularly within the hedgerows and woodland areas. The arable field and its modified grassland margins, which made up the majority of the Site, were sub-optimal for amphibians, due to the high levels of management and disturbance.



Figure 3.2: Waterbody Locations

- 3.33 The desk study returned 49 records of great crested newt, 31 records of smooth newt *Lissotriton vulgaris*, 10 records of common toad *Bufo bufo* and 21 records of common frog *Rana temporaria*. The closest record of each of these species were all recorded approximately 0.27km south-east of the Site. The most recent record was in 2019 of one great crested newt, one smooth newt and one common frog.
- 3.34 The desk study search returned 13 records of Great Crested Newt Class Survey Licence Returns. Two records were returned within approximately 0.5km west of the Site.
- 3.35 The desk study returned 10 Granted European Protected Species Applications for amphibians (GCN). The closest location was approximately 0.3km east of the Site.

Badgers

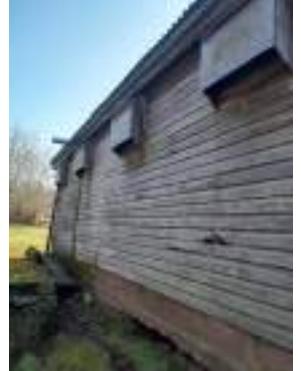
- 3.36 The Site was considered suitable for badger sett building and badger foraging, with soft earth, woodland and scrub areas and grassland margins all providing potential opportunities for this species.
- 3.37 The desk study returned no records of badger within 2km of the Site, during the last 10 years.

Bats

- 3.38 Potential roosting features were recorded on-Site including man-made structures and one mature oak tree.

3.39 **Table 3.3** below provides a description and assessment of the buildings onsite.

Table 3.3 Building Descriptions and Daytime Bat Assessments

Building ID	Description	Roosting Potential	Photograph
B1	<p>Constructed with a breeze block base extending to three quarters up the building. The remaining frontage was timber, with a metal, corrugated entrance and roof.</p> <p>The sides of the building were constructed from breeze blocks and timber.</p> <p>The outbuilding had several gaps between the wooden planks on the front of the building which could provide opportunities for roosting bats to enter roosting inside.</p>	Low	
B2	Outbuilding / animal shed constructed from timber with a corrugated metal roof. There were several gaps in the timber and spaces under the roof overhang, which could provide opportunities for day roosting bats.	Low	
B3	As with B2 the building was again constructed with timber and a corrugated metal roof. It was considered to have low potential for roosting bats.	Low	
B4	<p>Stone built building with a tiled roof. Gaps were identified in the walls and between roof tiles that could provide roosting potential.</p> <p>The building was open on one side, where wooden beams and a Queen truss structure was identified.</p>	Moderate	

B5	Open fronted building constructed from brick with a corrugated metal roof. Open and draughty in nature, however, some of the internal sections had timber boarding which could provide opportunities for day roosting bats.	Low	
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3.40 One mature oak, found near the north-eastern boundary along the edge of the woodland, was considered to have moderate potential tree roosting opportunities due to the presence of cracks and fissures in the upper limbs, a hollow in the trunk and a woodpecker hole on its northern aspect. **Table 3.4** below provides and description and assessment of the mature oak.

Table 3.4: Tree Description and Daytime Bat Assessment

Description	Roosting Potential	Photograph
The mature oak was located along Hedgerow C in the north-eastern section of the Site. Cracks and fissures in the bark of one upper limb were identified. A large hollow towards the top of the trunk and a woodpecker hole, both on its northern aspect were identified. This could provide opportunities for roosting bats.	Moderate	

3.41 The arable field itself was cultivated at the time of the survey and would likely offer a low invertebrate yield, rendering it sub-optimal for foraging bats. However, the hedgerows and woodland at the boundaries offered some opportunities for foraging and commuting bats and had connectivity with habitats in the wider landscape. In particular, the northern and western boundaries provided a connected flight line to woodland habitat to the north and along the watercourse to the west, rendering these features of higher potential for use by bats.

3.42 Overall the Site was considered to be of moderate potential for foraging bats

3.43 There were a total of 88 desk study records of bats returned during the last 10 years, within 2km of the Site. **Table 3.3** below shows the species, the number of records, distance from the Site and year recorded.

Table 3.3 Bat Species Records

Species Name	Number of Records	Location of Closest Record	Most Recent Record
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Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	14	0.46km south-west	2020
Brown long-eared <i>Plecotus auritus</i>	11	0.46km south-west	2019
Noctule <i>Nyctalus noctula</i>	10	0.46km south-west	2019
Pipistrelle species <i>Pipistrellus</i> sp.	14	0.46km south-west	2019
Daubenton's <i>Myotis daubentonii</i>	2	0.46km south-west	2017
Unidentified bat species	10	0.46km south-west	2017
Common pipistrelle <i>Pipistrellus pipistrellus</i>	11	0.47km south-east	2022
Myotis species	3	0.76km south-west	2019
Nyctalus species	1	0.81km south-east	2017
Natterer's <i>Myotis nattereri</i>	5	1.34km south-west	2019
Whiskered <i>Myotis mystacinus</i>	1	1.39km south-west	2019
Nathusius's pipistrelle <i>Pipistrellus nathusii</i>	2	1.48km north-west	2018

3.44 The data search returned three Granted European Protected Species Applications within 2km of the Site. The closest was approximately 0.5km north-east of the Site.

Birds

3.45 The Site offered some opportunities for nesting birds, both within the buildings, woodland and hedgerows and for ground nesting birds within the arable field itself (depending on the cropping regime). The woodland, scrub and hedgerow habitats also offered opportunities for foraging.

3.46 There were a total of 111 desk study records of birds recorded during the last 10 years within 2km. These birds are protected under the Wildlife and Countryside Act 1981 Schedule 1/BTO Red and Amber list bird species identified within the Local Records Centre search, within 2 km of the Site. **Table 3.4** below shows the species, the number of records, distance from the Site and year recorded.

Table 3.4 Bird Species Records.

Species Name	Number of Records	Location of Closest Record	Most Recent Record	Conservation Status
Marsh Tit <i>Poecile palustris</i>	2	0.38km north-east	2018	UK conservation status: Red.

Song Thrush <i>Turdus philomelos</i>	13	0.38km north-east	2018	UK conservation status: Amber.
House Sparrow <i>Passer domesticus</i>	6	0.59km north-west	2018	UK conservation status: Red
Skylark <i>Alauda arvensis</i>	4	0.77km north-west	2018	UK conservation status: Red.
Stock Dove <i>Columba oenas</i>	9	0.38km north-east	2018	UK conservation status: Amber.
Redwing <i>Turdus iliacus</i>	3	0.59km north-west	2018	Sch. 1 Pt. 1. UK conservation status: Amber.
Mistle Thrush <i>Turdus viscivorus</i>	4	0.73km south-east	2018	UK conservation status: Red.
Red Kite <i>Milvus milvus</i>	1	0.66km north-east	2018	Sch. 1 Pt. 1. UK conservation status: Green.
Swallow <i>Hirundo rustica</i>	7	0.71km north-west	2018	UK conservation status: Green.
House Martin <i>Delichon urbicum</i>	4	0.71km north-west	2018	UK conservation status: Red.
Grey Wagtail <i>Motacilla cinerea</i>	1	0.80km north-west	2016	UK conservation status: Amber.
Black-headed Gull <i>Chroicocephalus ridibundus</i>	3	1.08km north	2018	UK conservation status: Amber.
Dunnock <i>Prunella modularis</i>	6	1.08km north	2018	UK conservation status: Amber.
Mallard <i>Anas platyrhynchos</i>	4	1.55km south-west	2018	Sch. 2. Pt. 1. UK conservation status: Amber.
Starling <i>Sturnus vulgaris</i>	5	1.58km south-west	2018	UK conservation status: Red.
Kingfisher <i>Alcedo atthis</i>	1	1.60km south-west	2018	Sch. 1 Pt 1. UK conservation status: Green.
Greylag goose <i>Anser anser</i>	1	1.60km south-west	2018	Sch. 1. Pt 2. UK conservation status: Amber.
Swift <i>Apus apus</i>	1	1.60km south-west	2018	UK conservation status: Red.
Cuckoo <i>Cuculus canorus</i>	1	1.60km south-west	2018	UK conservation status: Red.,
Yellowhammer <i>Emberiza citronella</i>	3	1.60km south-west	2018	UK conservation status: Red.
Reed Bunting <i>Emberiza schoeniclus</i>	1	1.60km south-west	2018	UK conservation status: Amber.

Kestrel <i>Falco tinnunculus</i>	4	1.60km south-west	2018	UK conservation status: Amber.
Herring Gull <i>Larus argentatus</i>	1	1.60km south-west	2016	UK conservation status: Amber.
Lesser black backed gull <i>Larus fuscus</i>	4	1.60km south-west	2018	UK conservation status: Amber
Linnet <i>Linaria cannabina</i>	2	1.60km south-west	2018	UK conservation status: Red.
Bullfinch <i>Pyrrhula pyrrhula</i>	2	1.60km south-west	2018	UK conservation status: Amber.
Common (Mealy) Redpoll <i>Acanthis flammea</i>	12	1.82km south-west	2015	UK conservation status: Amber.
Lesser Spotted Woodpecker <i>Dendrocopos minor</i>	1	1.82km south-west	2013	UK conservation status: Red.
Redstart <i>Phoenicurus phoenicurus</i>	1	1.82km south-west	2016	UK conservation status: Amber.
Willow Warbler <i>Phylloscopus trochilus</i>	1	1.82km south-west	2015	UK conservation status: Amber.
Woodcock <i>Scolopax rusticola</i>	2	1.82km south-west	2018	UK conservation status: Red.
Fieldfare	1	1.82km south-west	2015	Sch. 1 Pt. 1. UK conservation status: Red.

3.47 Six species were recorded during the Site visit, including great tit *Parus major*, blue tit *Cyanistes caeruleus*, robin *Erythacus rubecula*, blackbird *Turdus merula*, song thrush *Turdus philomelos*, skylark *Alauda arvensis* and greenfinch *Carduelis chloris*. Of these species, greenfinch and skylark are listed as red and song thrush as amber on the latest list of Birds of Conservation Concern.

3.48 Based on the size of the Site, the distance of existing records and the habitats present, an important assemblage of birds was considered unlikely.

3.49 Two records of barn owl *Tyto alba* were returned as part of the desk study. The closest record was located approximately 0.76km south-west in 2018. B4 had large wooden trusses providing a suitable nesting platform for barn owl, although no evidence of this species was seen.

Reptiles

3.50 The habitats on the Site were considered unlikely to support common reptile species, as the intensively managed arable land and the short, highly disturbed grassland margins would not provide sufficient opportunities for basking and protection from predators. However, the areas of scrub, woodland and hedgerows around the

boundaries and the adjacent watercourse could provide limited opportunities for these species. It therefore cannot be entirely discounted that individual reptiles may periodically access the Site, but significant numbers were considered highly unlikely, and the Site would be highly unlikely to be a significant resource for reptiles.

3.51 There were five desk study records of reptiles within 2km of the Site. Three records of grass snake *Natrix helvetica* were returned. The closest located to the Site was approximately 0.32km south-east and the most recent record in 2016. Two records of slow worm *Anguis fragilis* were returned. The closest record approximately 1.11km north-west and the most recent record in 2019.

Flora

3.52 The desk study returned five records of notable or protected flora. Two records of corn spurrey *Spergula arvensis*, located approximately 0.73km south-east of the Site in 2013, two records of wild strawberry *Fragaria vesca*, located approximately 0.90km east of the Site in 2014 and one record of wood-sorrel *Oxalis acetosella* located approximately 1.05km east of the Site in 2014.

3.53 No notable flora was found to be present during the survey and was considered unlikely due to the arable dominance and the low botanical diversity.

Riparian Mammals

3.54 Two records of European otter *Lutra lutra* were returned as part of the desk study. The closest location approximately 1.32km south of the Site in 2015.

3.55 No records of water vole *Arvicola amphibius* were returned as part of the desk study.

3.56 The Site itself did not contain any waterbodies considered to be of optimal habitat for riparian mammal species. However, the tributary of Finham Brook adjacent to the Site boundary could offer some potential for otter or water vole.

Hedgehogs

3.57 Twenty- five records of west European hedgehog (*Erinaceus europaeus*) were returned as part of the desk study. The closest recorded location to the Site was approximately 0.24km north in 2019.

3.58 The Site was considered suitable to support this species as the habitats present including the grassland, woodland and hedgerows offer opportunities for foraging, refuge and hibernation.

Other Species

3.59 One record was returned of a polecat *Mustela putorius* located approximately 1.45km south-west of the Site in 2015 but this species was considered unlikely to be affected.

Biodiversity Net Gain Baseline

3.60 A baseline Biodiversity Net Gain Assessment has been undertaken using Natural England's Biodiversity Metric 3.1. The headline baseline results are summarised as below.

Area Habitats

- Total Site area: 23.77ha
- Total Baseline Units: 64.43

Linear Habitats

- Total Site Hedgerow lengths: 1.22km
- Total Hedgerow Units: 7.38

Condition Assessment Survey Results

3.61 **Table 3.4** below provides a breakdown of the Biodiversity Metric 3.1 assessment for the baseline habitat areas on-Site including the areas of habitats, results of the condition assessment survey and baseline habitat units.

3.62 Woodland and hedgerows were given the strategic significance 'formally identified in local strategy' due to their inclusion on the Warwickshire Local BAP. Other habitats were categorised as 'area/compensation not in local strategy.'

Table 3.4: Habitat Condition Assessment On-Site Summary of Areas

UK Habitat Type	Area (hectare)	Condition Assessment Result	Habitat Units
Cereal crop	21.2	N/A	42.4
Mixed scrub	0.03	Poor	0.12
Bramble scrub	0.11	N/A	0.48
Developed land; sealed surface	0.06	N/A	0.00
Other woodland; broadleaved	1.41	Good	19.46
Ponds (non-priority)	0.008	Moderate	0.06
Vacant/derelict land/bareground	0.02	Poor	0.04
TOTAL	23.77	-	64.43

3.63 **Table 3.5** below provides a breakdown of the Biodiversity Metric 3.1 assessment for the baseline hedgerows on-Site including the lengths of hedgerows, results of the condition assessment survey and baseline habitat units.

Table 3.5: Habitat Condition Assessment On-Site Summary of Lengths

Hedgerow Type	Length (km)	Condition Assessment Result	Hedgerow Units
Line of Trees	0.05	Moderate	0.20
Native Hedgerow	0.13	Moderate	0.60

Native Hedgerow	0.29	Good	2.00
Native Hedgerow	0.26	Moderate	1.2
Native Hedgerow	0.28	Good	1.93
Native Hedgerow	0.21	Good	1.45
Total:	1.21	-	7.38

4. DISCUSSION AND RECOMMENDATIONS

General

- 4.1 Current industry guidelines by CIEEM (2019) recommend that an Ecological Impact Assessment (EcIA) report is produced to accompany planning applications. This report should assess the associated impacts relating to the development proposals and include all mitigation and enhancement measures as appropriate as well as the results of any further surveys as recommended below.
- 4.2 A detailed and specific Biodiversity Enhancement and Management Plan (BEMP) should be produced for any development at the Site. This should be produced once any further surveys have been completed at the Site to inform of all mitigation and compensation measures and after the EcIA has been produced outlining these measures.

Designated Sites

- 4.3 The Site falls into the SSSI risk zone for Tilehill Wood. The development type (residential) is within the risk categories. The Local Planning Authority is therefore obliged to consult with Natural England as to the impacts of the development on the SSSI and potential mitigation measures required. Given the distance from the Site, the nature of the intervening habitats and the residential nature of the locality, significant impacts are considered unlikely.
- 4.4 Tocil Wood and Meadow LNR and LWS were located adjacent to the northern boundary. Construction phase pollution such as dust or vehicle fuel may have significant effects on these designations. It is therefore recommended that a Construction Phase Environmental Plan (CEMP) be produced to limit any potential impacts.

Habitats

- 4.5 The habitats of most value are considered to be the hedgerows, woodland and trees.
- 4.6 All hedgerows comprising at least 80% native species are considered Priority Habitats and all hedgerows within the Site would qualify under this criteria.
- 4.7 The woodland along the western boundary and the hedgerow along the northern boundary provide direct connectivity with the adjacent LNR/LWS and as such, should be retained and appropriately protected within the development masterplan.
- 4.8 Other hedgerows, woodland and trees should be retained and protected where possible, with alternative planting considered if retention is not possible.
- 4.9 The watercourse along the western boundary, although outside of the Site boundary, was also considered to be of higher value due to its connectivity with habitats in the wider landscape and its potential for use as a commuting route by a number of species. It is recommended that a buffer zone of at least 5m from the bank top is retained at all

times and delineated with temporary fencing to prevent any transgression of materials or machinery into this area. Measures to reduce any pollution of the watercourse must also be included within the CEMP.

4.10 The Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy suggests the following recommendations in terms of strategic landscape improvements: having regard to the selective evaluation of the Warwickshire Landscape Guidelines in 2006 – 2007 (accessed 24.02/2023)

Hedgerows and Field Boundaries

- Enhance the structure of the landscape through replanting and regeneration of primary hedgerow boundaries.
- Reintroduce mixed native species hedgerows along primary boundaries.
- Enhance the age structure of hedgerow tree cover, particularly hedgerow oaks.

Woodlands

- Conserve and enhance the biodiversity of Ancient Woodlands and veteran trees, through sensitive woodland Identify opportunities for new tree planting, to strengthen the sense of landscape cohesion and connectivity.

Grasslands

- Conserve neutral grasslands and enhance species diversity.
- Maintain and restore areas of older permanent pasture, including ridge and furrow meadows.
- Conserve the ecological character of wet grasslands.
- Identify opportunities for sensitive grassland management, to strengthen the sense of landscape cohesion and connectivity. The loss of the arable land and grassland margins was not considered significant. However, the incorporation of grassland into any future scheme would be suitable for the local area and would be an enhancement on the existing habitats.

4.11 Given the location of the Site and the prevalence of woodland in the local area, this should be considered a key habitat for this area and woodland enhancement and woodland creation should be encouraged where possible.

Protected and Notable Species

4.12 The habitats were considered suitable to support roosting bats, foraging and commuting bats, badger, nesting birds and hedgehogs. Furthermore, the presence of GCN and reptiles could not be ruled out.

Bats

- 4.13 The mature oak tree along hedgerow C was considered to provide moderate bat roosting potential. It is recommended that further tree climbing assessments of this tree are undertaken to further assess the suitability of the potential bat roosting features in line with current best practice guidelines (Colins, 2016). These surveys will determine if further nocturnal bat surveys are required on the tree. Such nocturnal surveys, if required, must be spread between May and August.
- 4.14 The buildings located in the south-western corner of the Site were considered to have low to moderate potential for roosting bats and it is recommended that further surveys are undertaken between May and August. Further internal inspections of the buildings are recommended in addition to this which may result in an amendment to the current level of roosting potential assigned to each building. Buildings categorised as having low or moderate potential to support roosting bats should be subjected to at least one or two nocturnal surveys, respectively, between May and August. If bat roosts are identified, a total of three surveys would likely be required. Any removal of the roost could only be done under a licence from Natural England with compensatory roosting provision included within the design.
- 4.15 It is recommended that hedgerows and woodland are retained within the development and dark corridors maintained along boundaries. As a priority, this must include the western and northern boundary. If dark corridors cannot be provided then it may be necessary to undertake bat activity surveys in line with current best practice guidelines (Colins, 2016). This would comprise bat activity transects monthly between April and October, coupled with static monitoring.
- 4.16 Bat boxes should be incorporated into at least 10% of any new dwellings to enhance the roosting provision in the local area.

Great Crested Newts

- 4.17 It is recommended that all ponds on site and within 500m of the Site (on the eastern side of the flowing watercourse) are subject to further survey.
- 4.18 Ponds which are assessed as being suitable for GCN should be subjected to eDNA testing in the first instance. This involves a single daytime visit to each pond to collect water samples which are then analysed in a third-party laboratory to detect the presence of GCN DNA. This survey can be conducted between mid-April and end-June. If the result is negative, no further survey work for that pond is required. Any ponds which have a positive result will require a full six-visit trapping survey, as described below, to obtain a population estimate.
- 2.2 GCN trapping surveys comprise of six additional survey visits. Half of the survey visits must be carried out between mid -April and mid-May, but all visits must be completed during the survey season (mid-March to mid-June) on evenings where the overnight temperature does not drop below 5°C. During each population survey, a minimum of three accepted survey methodologies are employed, usually bottle trapping, torching and egg searching.

4.19 Impacts to GCN, should they be present, would likely to be low due to the prevalence of largely arable terrestrial habitat which is sub-optimal for GCN. However, construction phase precautions would likely still be required which could include working under a method statement or translocation under licence. Should the onsite pond support GCN this would need to be retained or drained down under licence with compensatory ponds provided.

Badgers

4.20 A detailed badger survey should be undertaken at the Site to confirm the presence or absence of this species. Any setts would need to be monitored to confirm activity levels and enable classification of the setts.

4.21 The badger survey can be conducted at any time but surveys over winter can be favourable when badger setts are more visible as most vegetation has died back over the winter months.

4.22 If badger setts are found, ideally, these would be retained with a suitable buffer zone and appropriate connectivity. However, if this is not possible, a sett closure, under licence from Natural England, may be required. Sett closure can only be undertaken between July and November.

4.23 As a matter of good practice, any trenches dug as part of construction work should be covered over at night, or left with a ramp or sloping end, to prevent mammals from falling in and becoming trapped. Similarly, any pipes over 200mm in diameter should be capped off at night.

Nesting birds

4.24 As all species receive legal protection during nesting, it is advised to conduct vegetation clearance outside of the breeding bird season of March to August (inclusive). Work outside of this period should still be preceded by a nesting bird survey carried out by contractors, as some species can nest all year round. If it is necessary to conduct Site clearance within this period, it should be preceded by a nesting bird check conducted by an ecologist. Active nests found at any time will remain unaffected until all chicks have fledged.

4.25 Opportunities for nesting birds should be incorporated into the final masterplan. These should be integrated into at least 10% of the new buildings. Bird boxes should be installed two to four metres above ground on the buildings and should offer unobstructed fly-in access. The boxes should face between north and east, thus avoiding full sun and prevailing wind.

4.26 Specific boxes focussing on those species whose populations are declining and are most likely to be associated with the built environment, as well as a number of general purposes boxes should be installed.

Hedgehogs

- 4.27 The hedgerows and grassland are considered to provide opportunities for foraging, breeding and hibernating hedgehogs. Contractors must remain vigilant for this species during Site clearance and clear any particularly dense areas of ground level vegetation by hand. An ecologist should be contacted if a hedgehog is found.
- 4.28 The recommended enhancement of boundary habitats and creation of wildflower areas will also benefit hedgehogs by providing opportunities for refuge and foraging. In addition, permanent log and brash piles can be created within the areas of retained habitats to provide opportunities for refuge.
- 4.29 Connectivity for hedgehogs should be retained across any future development proposals. Gaps for hedgehogs should be provided to form a 'hedgehog highway' across the new residential gardens. These gaps should measure 13 x 13cm within fences, or underneath gates where possible. Hedgerows and rail fences can also be used instead of traditional wooden fences which allow hedgehogs to move through.

Reptiles

- 4.30 As occasional passage of reptiles through the Site cannot be ruled out, contractors must remain vigilant for reptile species during Site clearance. In the unlikely even that any reptiles are found, an ecologist should be contacted.
- 4.31 As a matter of good practice, building materials should not be allowed to accumulate on the ground (they should be placed on pallets or skips) to prevent the creation of habitat.

Riparian Mammals

- 4.32 It cannot be ruled out that water vole and otter may use the adjacent brook. Water vole surveys should be complete between April and September with one survey visit between April and June and a second and final survey visit between July and September. The survey visits should be 2 months apart. Whilst otter surveys can be completed at any time of the year, it is recommended that they are surveyed for concurrently with the water vole survey. Should such species be present, it would be recommended that a buffer of up to 30m be left from the brook.

Biodiversity Net Gain

General

- 4.33 The NPPF (2021) advises that all development should be seeking biodiversity net gain, with the Environment Act 2021 outlining a mandatory required 10% net gain for all developments from November 2023. As such, it is recommended that any development proposals take this into account and aim to deliver a minimum 10% net gain for the Site.
- 4.34 Once detailed development plans have been finalised it is recommended that a full Biodiversity Net Gain Assessment of the Site is completed. This will be used to calculate

the overall net gain/loss of the development and a report detailing the results in full of how net gain will be achieved should be produced and submitted with any future planning application

Biodiversity Net Gain Feasibility Assessment

4.35 In order to maximise the chance of achieving a net gain on the Site, it is important to ensure that habitats of highest ecological value are retained and enhanced (where feasible) within the final masterplan.

4.36 Reviewing the baseline BNG metric, the habitat contributing the highest number of biodiversity units is the arable land. This is purely based on the size of this habitat rather than the habitat being of a high quality. The next highest contributing habitat in terms of biodiversity units is the woodland, which occurs along the Site's western boundary. Ideally this habitat will be retained.

4.37 Habitats that are likely to provide higher numbers of biodiversity units at this site would be wildflower grassland, individual urban trees, scrub and/or ponds. Habitats connected to the northern and western boundaries would also score a higher number of units due to their proximity to the existing ecosite/LWS.

4.38 It is considered feasible that a net gain can be achieved on this Site, subject to the detailed design and detailed landscaping.

4.39 If it is not possible to achieve an on-Site net gain, then off-site compensation or a financial contribution will be required to achieve the deficit in biodiversity units. .

Biodiversity Enhancement and Management Plan

4.40 In line with the Environment Act 2021, any land identified for BNG will need to be managed for at least 30 years. A management plan will therefore be required, highlighting how the required condition criteria will be achieved, how the habitat condition will be monitored and any remedial actions.

Biodiversity Net Gain: Good Practice Principles for Development

4.41 **Table 4.1** below provides an overview of the Biodiversity Net Gain Good Practice Principles and a discussion to if the development proposal is likely to feasibly meet each one.

Table 4.1: Overview of the Biodiversity Net Gain Good Practice Principles

Principal	Discussion
1. Apply the mitigation hierarchy	In line with the mitigation hierarchy the habitats of most value should be retained and enhanced as part of the development proposals. No irreplaceable habitats were identified within the Site and only habitats of medium or low distinctiveness were identified within the Site. Therefore, these habitats can be replaced with better quality habitats if required.

2. Avoid losing biodiversity that cannot be offset elsewhere	There was no irreplaceable biodiversity within the Site.
3. Be inclusive and equitable	An Ecological Impact Assessment (EIA) should be produced for the Site which will outline the potential impacts of the development proposals which will be submitted to the Local Planning Authority and will be publicly available on the online Public Access planning portal to any interested parties.
4. Address risk	An EIA should be produced which should identify any risks and outline the required mitigation to eliminate risk.
5. Make a measurable net gain contribution	The recently ratified Environment Act requires a 10% net gain for all developments but remains in a period of transition pending secondary legislation and regulation. Once final landscaping proposals are confirmed a full BNG assessment will be undertaken and land highlighted for BNG on-Site will be subject to a 30-year management plan.
6. Achieve the best outcomes for biodiversity	The development proposals should aim to retain as much woodland and hedgerows within the Site and along the Site boundaries as possible, as these were considered to be the habitats of highest biodiversity value for species. They also provided good connectivity with habitats in the wider landscape, allowing dispersal corridors to be retained around the Site. Any future landscaping design for the Site should consider the best outcomes for biodiversity and aim to provide a range of native habitats within the Site of better quality and of more ecological value.
7. Be additional	Any new created and enhanced habitats should comprise native species and should aim to provide more diverse habitat than currently present. In addition, the proposed development should also include a scheme of other biodiversity enhancements including bat and bird boxes as well as a hedgehog highway to provide opportunities for species within the area.
8. Create a net gain legacy	Once a full biodiversity net gain assessment has been undertaken at the Site, an Ecological Management Plan is recommended to be produced for the Site to ensure that the proposed landscaping is managed and maintained for 30 years to benefit biodiversity.
9. Optimise sustainability	The development should optimise sustainability through a number of measures including an energy efficient design, use of sustainable materials and consideration for the environment and carbon footprint.
10. Be transparent	A separate report should be produced to outline all limitations, methodology and results in relation to the biodiversity metric. In addition, an EIA should outline any other ecological impacts and mitigation in relation to both species, habitats and designated sites. These documents should be submitted to the Local Planning Authority and will be publicly available on the online Public Access planning portal to any interested parties.

4.42 It is considered that the development proposals can feasibly meet with the Biodiversity Net Gain Good Practice Principles for Development.

5. CONCLUSIONS

5.1 The findings of this report are summarised in **Table 5.1** below.

Table 5.1: Summary

Ecological Receptor	Results & Discussion	Recommendations
General	The results of this assessment have identified some ecological constraints with any future development proposals and further survey work will be required to detail appropriate mitigation.	A comprehensive Biodiversity Net Gain Assessment, Ecological Impact Assessment and Biodiversity Enhancement and Management Plan should be produced for any future development proposals and should accompany any future planning application.
Designated Sites	Two designated sites are located within 2km of the Site boundary.	A CEMP should be produced to reduce the scale of any potential impacts to the adjacent LNR and LWS.
Habitats	The habitats within the Site were considered to be of relatively low value to biodiversity with the woodland, hedgerows and mature trees providing the most value.	The woodland, mature trees and hedgerows should be retained within the Site wherever possible. Any future development proposals are recommended to replace any hedgerows and trees to be lost to facilitate the development. A buffer zone should be maintained from the watercourse and pollution prevention measures included within the cemp.
Protected and notable species	The Site is considered suitable to support roosting bats, foraging and commuting bats, badger, hedgehogs and other species.	Further surveys for roosting bats, foraging bats, GCN, riparian mammals and badger may be required. A dark corridor along the site boundaries is recommended to be maintained to provide habitat for commuting bats across the Site. Good practice measures during construction should be followed to protect mammals and other species from harm. Connectivity for species such as hedgehogs and opportunities for bats and birds are recommended to be incorporated into the development.
Biodiversity net gain	The Site has a baseline habitat value of 64.43 units and a baseline hedgerow value of 7.38 units	There were no irreplaceable habitats within the Site and any landscaping scheme should maximise green space with the use of ponds, wildflower grassland, scrub, hedgerows and trees all considered appropriate for this location. A net gain onsite is considered feasible.

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APPENDICES

Appendix 1: Relevant Legislation

The following text provides information on the key legislation, which is applicable to this survey.

The main wildlife legislation relevant in the UK is as follows:

European Legislation

The relevant sections of the EC Directives and international conventions are summarised below:

- EC Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitat Directive 1992) as amended (92/43/EEC)

The Directive requires Member States to introduce a range of measures including the protection of species listed in the Annexes. The 189 habitats listed in Annex I of the Directive and the 788 species listed in Annex II, are to be protected by means of a network of sites. Once adopted, these are designated by Member States as Special Areas of Conservation (SACs), and along with Special Protection Areas (SPAs) classified under the EC Birds Directive. The Habitats Directive introduces the precautionary principle; that disturbance to the designated sites can only be permitted having ascertained no adverse effect on the integrity of the Site.

- EC Directive on the Conservation of Wild Birds (Birds Directive 1979) as amended (79/409/EEC)

The main provisions of the Directive includes; the maintenance of the favorable conservation status of all wild bird species across their distributional range.

- Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)

The Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1000 wild animal species.

UK Legislation

The sections of UK legislation considered to be of relevance include:

- The Conservation (Natural Habitats, and c.) Regulations (Amendment) (EU Exit) 2019 (as amended)

This transposes the Habitats Directive into national law. The Regulations provide for the designation and protection of 'European sites', and the protection of 'European protected species'.

- The Wildlife and Countryside Act 1981 (as amended) (WCA)

This consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive) in Great Britain.

- The Countryside and Rights of Way Act 2000 (CRoW)

This act strengthens wildlife enforcement legislation.

- The Protection of Badgers Act 1992

This act affords protection to badgers and their setts including the destruction or obstructing access to a sett.

- Wild Mammals Protection Act 1996

This act provides protection to all wild species of mammal in the UK and is more related to mammal welfare but is directly applicable during any site clearance or other works to a site which could harm mammals.

- Natural Environment and Rural Communities Act 2006 (NERC Act)

This act formed Natural England which places a duty on all public authorities, including local planning authorities to consider biodiversity. This Act also requires a list of species of habitats composed by the Secretary of State to help provide specific conservation targets. These species are known as Priority Species or Species of Principal Importance (SPI). These habitats are known as Priority habitats or Habitats of Principal Importance (HPI). Both SPI and HPI are listed under Section 41 of this Act. The NPPF also affords protection to these HPI's and SPI's.

- UK Post-2010 Biodiversity Framework

In addition, species and habitats listed on the UK Post-2010 Biodiversity Framework (formally the UK BAP) are also considered. Details on these species and habitats can be found at: <http://jncc.defra.gov.uk/page-5705>.

Species-Specific Legislation

Species specific legislation is provided in the Table below:

Species-Specific Wildlife Legislation

Plants	Sch. 8 Wildlife and Countryside Act 1981 (as amended) Some species are SPI - Section 41 NERC Act.	<ul style="list-style-type: none">• Pick;• Uproot;• Trade;• Possess (for trade) any wild plant listed.
Breeding birds	Wildlife and Countryside Act 1981 (as amended).	<ul style="list-style-type: none">• Kill;• Injure;• Take; any wild bird, their eggs or nest (with the exception of those on Sch. 2).
Specially protected birds	Sch. 1 Wildlife and Countryside Act 1981 (as amended).	As above but includes: <ul style="list-style-type: none">• Disturbing birds at their nest, or their dependent young.

Badgers	The Protection of Badgers Act 1992.	<ul style="list-style-type: none"> Wilfully kill, injure, take, or cruelly ill-treat a badger, or attempt to do so; Possess any dead badger or any part of, or anything derived from, a dead badger; Intentionally or recklessly interfere with a sett by disturbing badgers whilst they are occupying a sett, damaging or destroying a sett, causing a dog to enter a sett, or obstructing access to it. <p>A badger sett is defined in the legislation as "any structure or place, which displays signs indicating current use by a badger".</p>
Bats	<p>Sch. 5 Wildlife and Countryside Act 1981 (as amended).</p> <p>Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 (as amended).</p>	<ul style="list-style-type: none"> Intentionally or deliberately kill, injure or capture (or take) bats; Deliberately disturb bats (whether in a roost or not); Recklessly disturb roosting bats or obstruct access to their roosts; Damage or destroy bat roosts.
Common reptiles	<p>Sch. 5 Wildlife and Countryside Act 1981 (as amended).</p> <p>Countryside and Rights of Way Act 2000.</p>	Deliberate or reckless: <ul style="list-style-type: none"> Killing; Injuring Sale.
Common amphibians	<p>Sch. 5 and Sch. 9 Wildlife and Countryside Act 1981 (as amended).</p> <p>Countryside and Rights of Way Act 2000.</p>	<ul style="list-style-type: none"> Sell; Transport; and Advertise for sale.
Great crested newt	<p>Sch. 5 Wildlife and Countryside Act 1981 (as amended).</p> <p>Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 (as amended).</p>	<ul style="list-style-type: none"> Kill; Injure; Disturb Destroy or obstruct access to any place used for rest or shelter.
Hedgehogs	SPI – Section 41 NERC Act Wild Mammals Protection Act 1996.	Protection from harm, injury Intent to harm.
Other mammals	Wild Mammals Protection Act 1996.	Protection from harm, injury Intent to harm.
Invasive species (animal and plant)	Sch. 9 Wildlife and Countryside Act 1981 (as amended).	Release of any animal, plant or microorganism not native to the UK. Sale. Cause or allow to spread.

Protected Sites

A network of protected sites, at varying levels, have been put in place across the UK. Further details are provided below;

International Importance

- Natura 2000

Natura 2000 is the name of the European Union-wide network of nature conservation-sites established under the EC Habitats and Birds Directives. This network will comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

- Special Areas of Conservation (SAC)

SACs are designated under the EC Habitats Directive. The Directive applies to the UK and the overseas territory of Gibraltar. SACs are areas which have been identified as best representing the range and variety within the European Union of habitats and (non-bird) species listed on Annexes I and II to the Directive. SACs in terrestrial areas and territorial marine waters out to 12 nautical miles are designated under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended). New and/or amended Habitats Regulations are shortly to be introduced to provide a mechanism for the designation of SACs and SPAs in UK offshore waters (from 12-200 nm).

National Importance

- Sites of Special Scientific Interest (SSSI)

The SSSI series has developed since 1949 as the national suite of sites providing statutory protection for the best examples of the UK's flora, fauna, or geological or physiographical features. Most SSISIs are privately-owned or managed; others are owned or managed by public bodies or non-government organisations. The SSISIs designation may extend into intertidal areas out to the jurisdictional limit of local authorities, generally Mean Low Water in England and Northern Ireland; Mean Low Water of Spring tides in Scotland. In Wales, the limit is Mean Low Water for SSISIs notified before 2002, and, for more recent notifications, the limit of Lowest Astronomical Tides, where the features of interest extend down to LAT. There is no provision for marine SSISIs beyond low water mark. Originally notified under the National Parks and Access to the Countryside Act 1949, SSISIs have been renotified under the Wildlife and Countryside Act 1981. Improved provisions for the protection and management of SSISIs were introduced by the Countryside and Rights of Way Act 2000 (in England and Wales) and the Nature Conservation (Scotland) Act 2004.

Regional/Local Importance

- Wildlife Sites

Local authorities for any given area may designate certain areas as being of local conservation interest. The criteria for inclusion, and the level of protection provided, if any, may vary between areas. Most individual counties have a similar scheme, although they do vary.

These sites, which may be given various titles such as 'Listed Wildlife Sites' (LWS), 'County Wildlife Sites' (CWS), 'Local Nature Conservation-sites' (LNCS), 'Sites of Importance for Nature Conservation' (SINCs), or 'Sites of Nature Conservation Importance' (SNCIs), together with statutory designations, are defined in local and structure plans under the Town and Country Planning system and are a material consideration when planning applications are being determined.

Appendix 2: UK Habitat Classification Site Plan



Appendix 3: Photographs

<p>Overview – arable field – looking north-west from southern boundary</p>	
<p>Modified grassland adjacent to typical hedgerow boundary</p>	

Pond onsite	
Woodland along western boundary	
Adjacent watercourse	



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