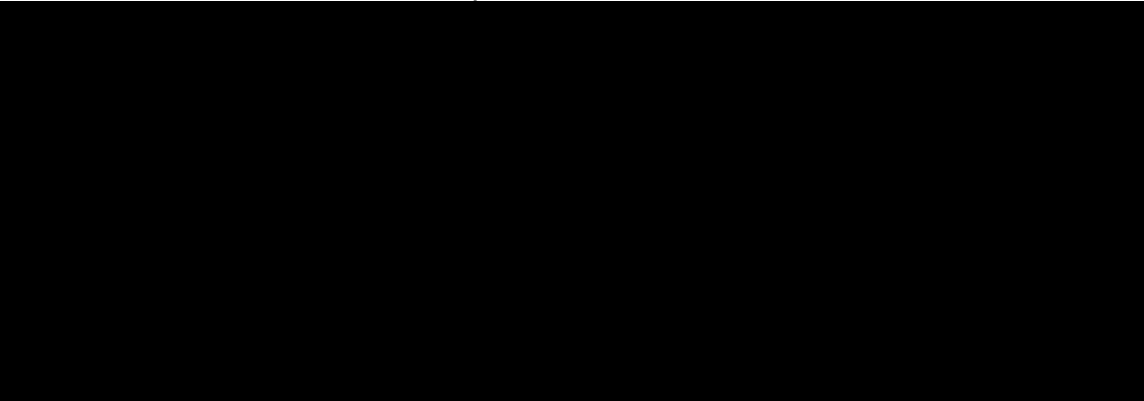

Part B – Please use a separate sheet for each representation

Name or Organisation: Whitley Residents & Neighbourhood Watch Association
Focus Group

The Focus Group is a subset of Whitley Residents & Neighbourhood Watch Association (WRNWA) and is tasked with representing the Association.

The members of the Focus Group are:



Keith Whitehead Chair WRNWA Focus Group

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

Paragraph Policy Other policies

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4 (3) Complies with the
Duty to co-operate Yes No

Please tick as appropriate.

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

See representation on separate sheet below

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

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

See representation on separate sheet below

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

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

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

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

☐

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

☒

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

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

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

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

Paragraph

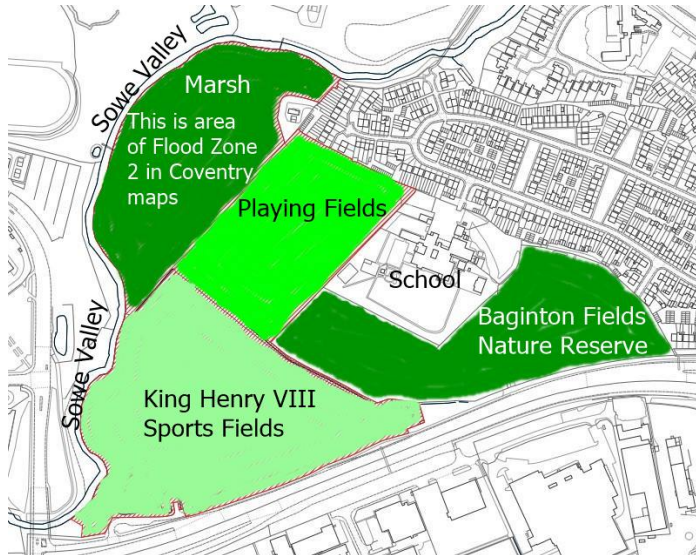
Please add any further comments relating to the SA report in the box below.

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

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

We do not consider that Land at Baginton Fields will enable the delivery of a sustainable development and therefore is not consistent with National Policy

Strategic Policy JE2:4 Land at Baginton Fields allocated for Employment Development comprises of marshland/scrubland (Local Wildlife Site), Baginton Fields Playing Fields, the site of Baginton Fields School, Baginton Fields Local Nature Reserve (Local Wildlife Site), and King Henry VIII Sports Fields. The site area is 25 hectares.



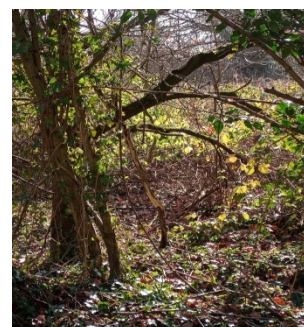
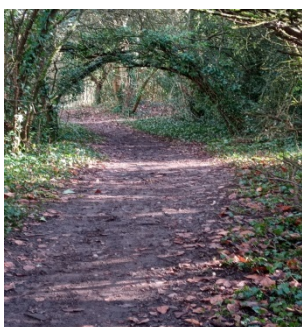
Land at Baginton Fields (Whitley East) is part of the West Midlands Investment Zone, (designated with effect from 8 April 2024, GOV.UK). However, not all of the allocation of Land at Baginton Fields, (Policy JE2:4) is included. Baginton Fields Local Nature Reserve and the site of Baginton Fields School are not included. We believe that the Local Plan Review proposed map and the policies map should be amended to reflect the West Midlands Investment Zone, Whitley East, which does not include the Baginton Fields Local Nature Reserve and site of Baginton Fields School. This would provide clarity and certainty to the extent of the allocation boundary of Land at Baginton Fields, Strategic Policy JE2:4, intended for employment development.

The National Planning Policy Framework (December 2023) paragraph 105 states: *Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.*

We believe that there is an opportunity through the Local Plan Review to designate specific areas of Land at Baginton Fields as Local Green Space.

We consider that the designation of Local Green Space of Baginton Fields Local Nature Reserve, would give stronger protection to this area, similar to that of policy protection of Greenbelt. We also consider that Baginton Fields Local Nature Reserve should be outlined as a Local Nature Reserve on the policies map in keeping with the Stonebridge Meadows Local Nature Reserve.

Baginton Fields Local Nature Reserve



Strategic Policy GB3: Local Green Space (1) states *The city's Local Green Space boundaries are identified on the Policies Map*. The Sowe Valley was formally designated Local Green Space through the 2017 Local Plan and is shown on the Policies Map.

The Baginton Fields area of natural scrubland/marshland (Local Wildlife Site) that is part of the Sowe Valley corridor has not been included in the Local Green Space designation and is not shown on the Policies Map. In our view, to protect the natural scrubland/marshland area, wildlife and biodiversity of this part of the Sowe Valley corridor, it should also be included in the designation of Local Green Space and shown on the policies map as such. This would give consistency with other areas of the Sowe Valley designated Local Green Space and support the aspirations and goals in the Coventry Climate Change Strategy 2024-2030 particularly related to nature and green and blue spaces. This increased protection would help to ensure that the river corridor's wildlife and biodiversity will not be disturbed by development, and would help to sustain ongoing natural flood defenses against the challenges of our changing weather patterns.

The Baginton Fields area of natural scrubland/marshland (Local Wildlife Site) is identified by the Council as Flood Zone 2 (medium risk of flooding). We consider that given all the other developments that are being built along the Sowe Valley which could increase flood risk, any potential development on such land would not be sustainable. For this reason, we also consider that Baginton Fields marshland should not be included in the allocation for employment development (Policy JE2:4) and the Local Plan Review proposed map and the policies map should be amended accordingly.

Climate Change Strategy 6.0 Nature Goal: Support nature recovery and create better access to green and blue space for wildlife to thrive and communities to enjoy.

Baginton Fields Marshland (Local Wildlife Site)



We believe knowledge and understanding of the impact of climate change and the importance that nature plays has grown over the years and we now have strategies such as the West Midlands Local Nature Recovery Strategy being developed, (Coventry is a supporting authority), Coventry City Council (CCC) Green Space Strategy (2019 -2024), CCC Open Space SPD (2022), One Coventry Plan (2022-2030) and of course policies in the Local Plan.

However, despite the ambitions in these documents, there are policies in the Local Plan intended to protect such areas as Local Wildlife Sites and Local Nature Reserves that conflict with each other.

Policy GE3: Biodiversity, Geological, and Landscape Conservation 1. States: *Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced.*

Policy GE2: Green Space 1. States: *Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation ...*

Land at Baginton Fields is informal green space as defined in CCC Green Space Strategy and is very much of value for amenity, recreational, and community use.

Notwithstanding that Land at Baginton Fields is informal green space, Land at Baginton Fields is a strategic land allocation for employment development and as such will not necessarily be afforded protection from development if the whole site remains part of the allocation.

Last year a petition (193 people signed this ePetition) was presented to the Council requesting that Land at Baginton Fields be designated Local Green Space. This was due to local residents' concerns that Land at Baginton Fields had been allocated for employment development. It would appear that the very policies intended to protect such sites as Local Wildlife Sites and Local Nature Reserves are not effective if the land is a strategic allocation for development (Policy GE2). The community has already lost a large amount of informal green space that included Local Wildlife Sites to both commercial and housing developments; we don't want to lose more.

Policy GE3: Biodiversity, Geological, and Landscape Conservation sets out the requirements for development proposals to lead to a minimum 10% Biodiversity Net Gain (BNG) either on site or where this is not possible, off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased.

This gives three routes for a developer to achieve the minimum 10% BNG. To ensure Land at Baginton Fields is truly a sustainable development it must show a minimum 10% BNG which ideally should be delivered on site for continuing benefit to the local community. This could be achieved if areas such as the marshland (Local Wildlife Site), Local Nature Reserve and Baginton Playing Fields were effectively protected through policy, and designated Local Green Space.

National Planning Policy Framework (NPPF), December 2023, paragraph 8

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective; b) a social objective; and c) an environmental objective

In our view, without effectively protecting Baginton Fields Playing Fields, the Local Nature Reserve and marshland, Land at Baginton Fields (Policy JE2:4) will not be able to deliver a sustainable development and will not accord with the NPPF's environmental objective, 'to protect and enhance our natural, built and historic environment; ...'.

Strategic Policy DS4 (Part A) – General Masterplan Principles ix *Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1).* If a proposal is a strategic land allocation for development, it is unlikely that it will accord with Policy GE3.

Strategic Policy DS4 (Part B) Whitley Specific Masterplan Principles, vii - *An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road*, but does not specify the size or extent of the buffer, which could be open to interpretation, and therefore lacks clarity.

Strategic Policy DS4 (Part B) Whitley Specific Masterplan Principles ix – *Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2.*

Policy GE2 Green Space (3) has allocated two sites to support the provision of new sports pitches for the proposed allocations at Policy H2:19 and Policy JE2:4. This would make provision for King Henry VIII sports fields, but does not appear to make provision for Baginton Playing Fields.

Yet Baginton Fields Playing Fields is an important recreational amenity for the local community and valued publicly accessible green space that is within walking distance of local residents, supporting active living. Baginton Fields Playing Fields also provides important connectivity between Whitley Grove Woods and Baginton Fields Local Nature Reserve.

We consider that Baginton Playing Fields should be designated Local Green Space because of its recreational value to the community, in accordance with National Planning Policy Framework (December 2023), paragraph 106. We also consider that Baginton Playing Fields should not be included in the allocation for employment development (Policy JE2:4) and the Local Plan Review proposed map and the policies map should be amended accordingly.

Baginton Fields Playing Fields



Strategic Policy DS3: Sustainable Development Policy states '*... to secure development that improves the economic, social and environmental conditions in the area...*' Allocating Land at Baginton Fields for employment development does not appear to accord with improving the environmental conditions in the area.

The value of the Baginton Fields Playing Fields, Local Nature Reserve and the marshland area along the Sowe Valley corridor cannot be over-estimated in terms of its amenity value for local residents as a means of encouraging walking and improving mental health, along with the natural habitats it offers to local wildlife.

There is much made of creating wildlife corridors that enable animals and birds to move between green spaces and this area along with Stonebridge Meadows and the Sherbourne valley offers a natural corridor that can enhance and support increased biodiversity as the surrounding area is inevitably developed as part of the West Midlands Investment Zone.

Once green space is lost it can never be regained and with increasing temperature, the potential to flood and the urban heat island effect, the value of green space as a mitigating factor has to be taken into consideration in terms of its own economic, social and environmental value going forward.

Preserving the areas of Land at Baginton Fields mentioned, will also demonstrate the Council's commitment to its Climate Change Strategy and the growing importance of green and blue infrastructure in the city.

As stated in the National Planning Policy Framework (December 2023, paragraph 7)

At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs

(Resolution 42/187 of the United Nations General Assembly)

Modifications considered necessary to make the Local Plan Review sound

Policy JE2:4 Land at Baginton Fields To provide clarity and certainty to the extent of the allocation boundary intended for employment development we believe that the Local Plan Review proposed map and the policies map should be amended as follows:

To reflect the West Midlands Investment Zone, Whitley East (Land at Baginton Fields), Baginton Fields Local Nature Reserve and school should be removed from JE2:4.

To reflect the unsuitability of potential development on the marshland, identified by the Council as Flood Zone 2 (medium risk of flooding), this area should be removed from JE2:4.

To reflect the recreational value to the community of Baginton Fields Playing Fields this area should be removed from JE2:4.

National Planning Policy Framework (December 2023) paragraph 105 states:

Local Green Spaces should only be designated when a plan is prepared or updated; and be capable of enduring beyond the end of the plan period.

To give stronger protection similar to that of policy protection of Greenbelt, we request that the following areas in Policy JE2:4 Land at Baginton Fields, be designated Local Green Space.

Local Nature Reserve; Baginton Fields Playing Fields; and marshland