## Coventry Local Plan Review Regulation 19

Proposed Submission (Publication) Stage Representation Form (guidance note below)

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(For official use only)

Name of the Plan to which this representation relates:

Coventry Local Plan Review – Regulation 19 Proposed Submission (Publication)

Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025 email to <a href="mailto:planningpolicy@coventry.gov.uk">planningpolicy@coventry.gov.uk</a>, via our consultation portal <a href="https://coventrycitycouncil.inconsult.uk/system/home">https://coventrycitycouncil.inconsult.uk/system/home</a> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice: www.coventry.gov.uk/planningpolicyprivacynotice

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

**Part B** – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

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## 1. Personal Details\*

## 2. Agent's Details (if applicable)

\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.

Title	Ms	Mr
First Name	Sally	Gary
Last Name	Miller	Stephens
Job Title	Senior Land and Planning Manager	Partner
(where relevant) Organisation (where relevant)	Hallam Land	Marrons
Address Line 1	10 Duncan Close	Bridgeway House
Line 2	Red House Square	Bridgeway
Line 3	Moulton Park	Stratford-upon-Avon
Line 4	Northampton	
Post Code	NN3 6WL	CV37 6YX
Telephone Number		
E-mail Address		
Part B – Please us	se a separate sheet for each re	presentation
Name or Organisat	tion:	
3 To which pa	rt of the Local Plan Review does	this representation relate?

Paragraph Policy GB2

4. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	No	
(2) Sound	Yes	No	Х
(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.

Policy GB2: Safeguarded Land in the Green Belt

## Not sound

- 105. Policy GB2 is not justified or consistent with national policy as it fails to reflect and appropriate strategy for South Coventry. The Policy identifies areas of safeguarded land in the Green Belt. These areas were identified in the 2017 Local Plan due to the potential longer term development options in Warwick District that required flexibility in being able to respond to emerging circumstances. The Council were keen to avoid Green Belt 'islands' which would not meet the purposes of the Green Belt (paragraph 9.4 to 9.8 of the Plan).
- 106. Land south of Stoneleigh Road (Site Ref: WAI-002-24) should be added to the list of sites within the Policy. It too is a potential Green Belt 'island' between the urban area and land which is a 'preferred option' for release from the Green Belt within Warwick District within the South Warwickshire Local Plan (SWLP).
- 107. Hallam Land have put forward land south of Stoneleigh Road as a comprehensive mixed use residential-led development through the Local Plan Review and South Warwickshire Plan (SWLP) processes. The land put forward crosses the administrative boundary between Coventry and Warwick.
- 108. It is important to note that whilst the land within Coventry's administrative boundary in isolation is not deliverable, it forms an important component of the wider proposal being promoted which would deliver significant economic and environmental benefits for the City through planned infrastructure as evidenced in these representations and within the submitted Vision Document, Illustrative Masterplan and Transport Representations. HL are therefore requesting its removal from the Green Belt and safeguarding for development consistent with the other sites within Policy GB2.

- 109. The land south of Stoneleigh Road comprises 11.87ha. The land is within the Green Belt but immediately adjoins the urban area of the City. The land is contained on 3 sides by housing development and contains buildings and is in part previously developed.
- 110. The wider site within Warwickshire is bounded to the south by the ongoing development of HS2, which will form a cutting and create an enduring physical boundary for the development area. The Coventry Road forms a strong physical barrier on the western boundary of the site comprising mature blocks of trees and existing housing. An existing railway line runs through the middle of the site, between Coventry and Kenilworth.
- 111. To the north and north-east of the site, a large area of land is designated in the Warwick Local Plan for residential-led mixed use development through allocation H43 Kings Hill, which will form a compact urban extension that directly adjoins Coventry. Kings Hill in part already has planning permission. To the east lies the Finham Brook and its tributaries which is a defined boundary.
- 112. The nature of this wider site provides a unique opportunity for cross-boundary co-operation (as already evident in the joint work already undertaken between the authorities) and allows for Coventry City Council to form a strategic partnership with the respective South Warwickshire Councils to deliver a significant uplift in sustainable transport infrastructure within South Coventry and also meet their identified housing needs in a sustainable manner.
- 113. The benefits of removing land south of Stoneleigh Road from the Green Belt and its safeguarding for development are set out within the Vision Document, but in summary:
- Facilitate and assist with the delivery of planned investment in sustainable transport measures; namely public transport interchange and park and ride, the provision of EV charging at the interchange and in the longer term Coventry South Rail Station and Very Light Rail (see image within Vision Document)
- Facilitate and assist with the delivery of a Transport Corridor in order to assist with delivery of Kings Hill to the north and improve connectivity to the University and beyond;
- Improve the setting and character of the Kenilworth Road Conservation Area through the removal of through traffic;
- Make best use of planned infrastructure as part of the Kings Hill SUE, and provide a seamless extension of this planned area; and,
- As illustrated within the Vision Document, there is a real opportunity to deliver a development that is designed to be net zero carbon, climate resilient, well connected, healthy, safe and inclusive, biodiverse, well designed and beautiful.
- 114. The wider site is situated within Coventry's Green Belt, however as identified in the Green Belt Appraisal, February 2023, undertaken by FPCR on behalf of HLM and submitted as part of previous representations, it was concluded development on this site can be a compact addition to Coventry in an

area that will be contained by significant infrastructure such as HS2 and the proposed Transport Corridor. The Coventry Green Belt Technical Update Study (July 2024) considered release of the land south of Stoneleigh Road within Coventry would represent a clear encroachment into a sensitive open countryside gap amounting to urban sprawl. However, the South Warwickshire Green Belt Assessment (September 2024) of the wider land within Warwickshire concluded the land made a moderate contribution to Green Belt purposes. (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 noncompliance 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. 1. Policy GB2 should be amended to safeguard land south of Stoneleigh Road within Coventry to ensure proposals within the South Warwickshire Local Plan are not frustrated by Green Belt 'islands' consistent with the approach adopted in Policy GB2 with other former Green Belt land south of Coventry.

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

necessary to participate in examination he	aring sessi	on(s)?
No, I do not wish to participate in hearing session(s)	Х	Yes, I wish to participate in hearing session(s)
<b>Please note</b> that while this will provide an init in hearing session(s), you may be asked at a participate.		• • •
<ol><li>If you wish to participate in the hearing sess this to be necessary:</li></ol>	ion(s), plea	ise outline why you consider
To respond to the Inspector's questions, elaborate to any further information the Council submits		points raised, and respond
(Continue on a separate sheet /expand box if neo	essary)	
Please note the Inspector will determine the		

8. If your representation is seeking a modification to the plan, do you consider it

**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.