

Coventry Local Plan Review

Regulation 19

Proposed Submission (Publication) Stage Representation Form

(guidance note below)

This is a submission from Keep Our Green Belt Green. We also adopt: the submissions of CPRE Warwickshire and of S. McNaught on behalf of his parents which are found in the appendices and the report of Gerald Kells, prepared for KOGG, which is attached to this submission email.

Ref:

(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 planningpolicy@coventry.gov.uk, via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> 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 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.

Part A

**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

Mr

First Name

Merle

Last Name

Gering

Job Title

Chair

(where relevant)

Keep Our Green Belt Green

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

4. Do you consider the Local Plan Review is:

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

Not sound

(3) Complies with the
to co-operate

Yes

No

No. Has been secretive,

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.

Summary: The local plan is not sound because

- It grossly overestimates real deliverable housing need – When you take out PBSA student housing, delivery of family homes has been 671 dwellings/year for the last 10 years – far from either the Hedna or the NSM. Even if the NSM is adopted, it can only be an aspirational maximum . DS1 and Overall Need DS3
- De facto, Coventry Council discounts environmental and social needs, despite fine words. The council does follow its own policy -
- Land without planning permission in former green belt areas should be

returned to green belt – for green belt reasons, and for a wealth of local policy reasons – concerning biodiversity, heritage, flooding, landscape, transport, amenities [surgeries, schools, retail], climate change. DS3, GE1,

Our recommendations:

Housing Need (paras 3.6-3.9) should be replaced with a maximum housing need of 1388 dpain line with the New Standard Methodology and that this is generally consistent with the evidence set out under the HELAA and similarly Para 6.9 and 6.10).

Policy DS1 (1a) should consequentially refer to a total maximum of 27,760 additional homes as should Policy H1 as a maximum to be set out in a gently rising housing trajectory from present real levels, net of PBSA, to allow for review of delivery before committing to unneeded development. –Excluding PBSA ,real delivery 671 dpa, has been less than half the N S M figure of 1366

Policy DS (4a) should also refer to unmet employment and housing need.

The windfall allowance in Table 6.1 should be adjusted to 5,600 and an additional line put in for windfall PBSA development amounting to 1,400. This would change the total to 35,263. 5.6 given the excess, allocations should be removed which fail other tests in the NPPF and Local Policy that would reduce the overall figure

.
The updated density policy H9 is supported particularly H9 (1) which puts the onus on developers to make efficient land, something not included in all plans.

The Policy H10 is supported where it can be shown there is genuine demand for PBSA. Recently, owners have applied for permission to rent to non students because demand has been very weak.

There is no basis for policy GB2 . The role of Policy GB2 is to safeguard some greenbelt land for housing where it would be marooned by development in neighbouring authorities. Given the new evidence, there is no numerical justification for safeguarding that land.

1.1 Not Sound — not positively prepared] – the revealing slip of the tongue

Policy DS1 Overall Development Needs

In its own webpage, " About the Local Plan Review" the council talks only about housing and employment. Screenshot below

During the Examination of the Local Plan the Planning Inspector is only able to assess whether the revised Local Plan has been prepared in accordance with legal and procedural requirements, and whether it is 'sound'. Therefore, all representations on the draft Local Plan must relate to a matter of legal compliance or a matter of soundness as follows:

Legal compliance: Does the Local Plan comply with the legal and procedural requirements for its preparation?

Soundness: Is the Local Plan sound? Has it been positively prepared, justified, effective and aligned with national policy? Does it meet the following four tests? It must be:

- Positively prepared – the Plan has attempted to meet all of Coventry's housing and employment land needs and discussions have taken place with neighbouring councils to help meet any shortfalls.
- Justified – the Plan sets out a development strategy that has been informed by up-to-date evidence and consideration has been given to alternative strategies.
- Effective – the Plan is deliverable, and efforts have been made to address any issues impacting on the broader region.
- Consistent with national policy.

While Para 1.1 of the draft plan states the council will balance housing, economic, social, and environmental needs, in practice, the council restricts its 'positively prepared' obligation to the "housing and employment needs" of the city only. See [About the Local Plan Review – Coventry City Council the 4 soundness tests.pdf](#).. [screenshot above]

The NPPF makes no such restriction. While environment and social needs are mentioned elsewhere, in the draft Coventry local plan, in practice the city has subordinated these routinely and regularly since 2017.

- EG. Traffic on the A45 being at 150% in the plan period was disregarded in considering major applications at Eastern Green.
- Air Quality concerns were swept aside at Kings Hill, even though Coventry has poor air quality, in the worst 30 in the country,, by making absurd assumptions about modal shift, [20% drivers leaving their cars] -which have never been seen anywhere in the country
- The NHS begs for more surgeries in major local developments, but they are not included. The local hospitals are at 100% of capacity, but still thousands more homes are added to the area
- Schools are promised, at the Marconi site, and Banner Lane, but not delivered. At the time of writing, 6 years after major planning permission was first granted in Keresley, there is no agreement for a primary school.

- 1000s Planning permissions have been granted even though water assessments show Coventry having a shortage by 2026.
- Planning consent at Bunsons Wood required a CEMP and flood prevention measures before the start of construction, but there was no CEMP and local people have been flooded 4 times in recent months.

The evidence is clear. De facto, Coventry operates a policy of greatly prioritising housing and employment, to the cost of substantial environmental damage and lack of health and education provision.

Not Justified- not sound policy DS1 Overall Provision DS1B

This plan is not underpinned by proportionate reliable evidence. For the 2017 plan, absurd ONS population projections, of well known unreliability especially for Coventry, were relied upon. The leader of the Council said in public they were “stupid” Now the council seeks to rely on a bespoke population forecast of the future, the HEDNA, which could be just as unreliable as the previous SNPP2014 forecast. Two factors make this a particular risk. 1) The population of the city is volatile - very sensitive to the number of students at the 2 universities, which fluctuate. This year, the number of university students went down by 7500 [data from online and FOI].

2) We live in a time of population volatility. The New Standard Method, announced in Dec2024, provides a better basis for calculating housing need – which contains up to date evidence – the number of homes and average house prices instead of speculative guesses about future trends in population. We are seeing extraordinary changes in fertility, longevity, and migration at the present time – who could have predicted hundreds of thousands of Ukrainians arriving and natural increase collapsing to below replacement levels? – Which makes any population forecast or projection particularly treacherous.

Not deliverable – not sound DS3 section 3

3. Overall Levels of Growth and the Duty to Co operate

Policy DS1 b,c,and d - all call for review if there is new evidence

There is clearly new evidence – the complete failure of SNPP2014, and the lack of any of the exceptional circumstances which the 2017 inspector relied upon, and new government policy, the New Standard method, all demand a fresh evaluation of overall housing need.

New Evidence

Even if the New standard Method is adopted, the numbers do not stack up. It will be nearly impossible to deliver 1366 homes per year. In the last 10 years **PBSA has made up nearly half of all completions**, (which have totalled 1259/yr for dwellings of all kinds)

Since 2014, approx 14,700 pbsa beds have been added to market – see the Council PBSA study, Purpose_Built_Student_Accommodation_Market_Study_2024.

At 2.5 beds/dwelling this has accounted for 5880 completions [conversion ratio of 2.5 beds/completion comes from the Housing delivery test and Coventry AMR].

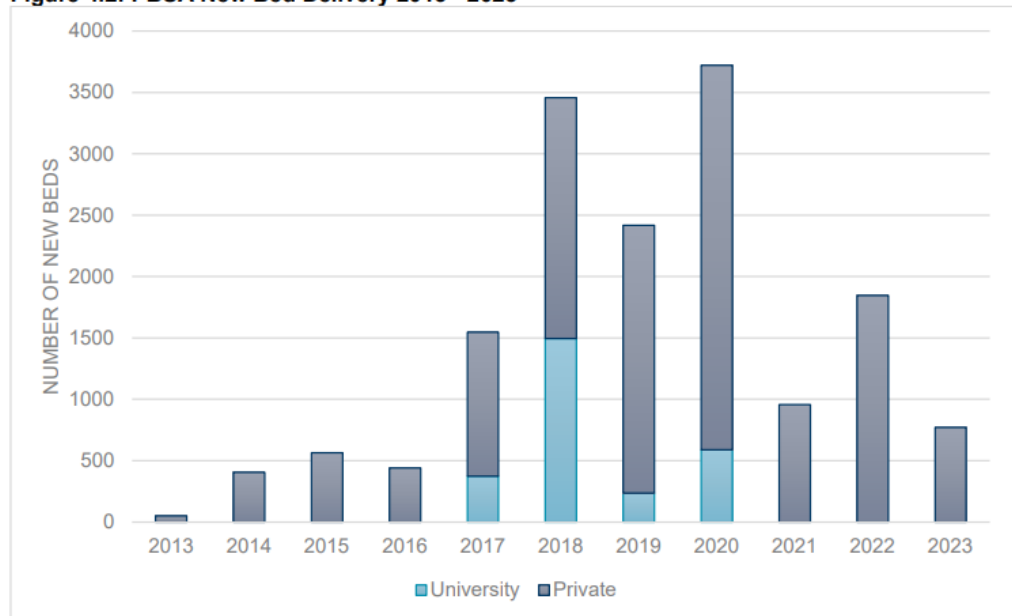
Therefore in this 10 year period, the market has only delivered 671 dwellings/year for the family/non student residential market. Even at this much lower delivery rate, builders have struggled to sell their homes. In Keresley, Taylor Wimpey have reduced their starter price from £375,000 at opening, to £275,000 currently, with lots of sweeteners. Even accepting the New Standard Method, the homes are not deliverable in the current market.

The government may wish for 1366 homes/year, but you cannot defy the laws of gravity. The market will not deliver 1366 homes/year in Coventry. Only a massive government intervention, which no one envisages, could do this.

As student numbers are declining, and landlords have been struggling to fill pbsa – see the local press – they are applying to allow non students to use them – there is no reason to think that the bonanza of pbsa construction will continue. Numbers, which can be counted on, are the normal residential market, much lower than the Hedna or even the NSM.

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

Figure 4.2: PBSA New Bed Delivery 2013 - 2023



Source: Cushman & Wakefield Student Accommodation Tracker 2023/24

Policy recommendations

Land without planning permission formerly in the green belt until 2017 shall be returned to greenbelt


DS1 The NSM shall be reflected in a housing trajectory which is gradually stepped upwards from present levels of real family delivery and will be evaluated every 5 years for market deliverability. Over ambition will be avoided because it damages the environment and causes urban sprawl.

Further reasons why land at Keresley should be de-allocated as supported by local plan policy

Reason	Policy ref
Biodiversity – The HBA, The habitat biodiversity Audit recognised The area around Hounds Hill, including the mere and the alders, as one of the most biodiverse sites in Coventry – see	DX4 .xi Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensatory provisions where appropriate (having regard to Policies GE1-4)

the extracts from their reports in Appendix 3	The indicative masterplan identifies hounds hill as a “strategic viewpoint”. The 1995 Arden Design Guidance, identified this part of Keresley as “especially significant as the
Biodiversity: Hounds Hill is very important for biodiversity HS2.1 – policy recommendation: No development on Hounds Hill, or land to the north of Thompson’s lane, or adjacent to the mere.	<p>GE1.6 Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced</p> <p>a. Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal); e. Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity; f. I</p> <p>Pg 82 The use of land in Coventry’s Green Belt also has a positive role to play in fulfilling the following objectives, through active countryside management: • Retaining land in agriculture, forestry, and related open uses; • Providing access to the open countryside and green corridors for the urban population, linked to the surrounding countryside of Warwickshire and Solihull; • Providing opportunities for outdoor sport and recreation near urban areas; • Protecting and enhancing attractive landscapes, including the Ancient Arden landscape, green corridors, and landscapes near to where people live; • Securing biodiversity and nature conservation interests; and • Improving damaged and despoiled land.</p>
Biodiversity	The Council have also considered the ecology and biodiversity value of sites, the agricultural land classification, infrastructure constraints and opportunities, and Historic Landscape Character. This information has also been brought together through Sustainability Appraisal to consider the most appropriate locations for sustainable development.
Biodiversity	<p>GE!</p> <p>2. New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation.</p>
Further evidence of biodiversity	<p>Policy GE1</p> <p>The following BTO Red list birds live[and many breed] in the</p>

	<p>vicinity of Hounds Hill – evidence: 10 yrs field notes of Mark Whittle all Within the 2im radius recognised by Natural England as relevant</p> <p>Skylark Grey Wagtail marsh tit willow tit – extremely endangered, less than 1000 pair in all of Britain mistle thrush Woodcock Yellow hammer – Tree sparrows Linnets Fieldfare Lapwing Lesser spotted woodpecker Lesser spotted woodpecker– extremely endangered, less than 1000 pair in all of Britain</p>
Flooding	<p>GE1.6.g Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by: g. Flood risk management and improving surface water quality.</p>
	<p>Flooding is already a serious problem in Keresley – Bennetts road has flooded 4 times in the last 5 months. The drainage network is inadequate and Severn Trent has no announced plan for when it will be remedied. The picture below shows flooding in Jan 25, along the boundary wall of Ravenswood in Bennetts Rd,- at the bottom of the hounds hill drainage.</p> <p>20</p>

	 <p>Flooding once again recurred on 3 March as I write.</p>
Heritage	<p>The Keresley Hall Brook valley, running downhill from the Scheduled Ancient Monument at Corley Rocks, was recognised by the 1995 CCC Arden Design Guidance, still in effect, as “especially significant” as the best remaining example of the Arden Forest Landscape. In Warwickshire Coventry Conservation Officers confirmed it was the only area still containing a complete stone age economy i.e. living, cultivation, and hunting/gathering sites</p> <p>The Masterplan recognised the Scheduled ancient Monument [of both stone age and Roman occupation} as a strategic viewpoint, - which would be ruined by development at hounds hill and north of Thompsons lane.</p> <p>Policy: DS4.x, GE1.6</p> <p>x. Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;</p> <p>6. Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:</p> <p>Tourism</p> <p>“The overarching vision is that: “By 2024 Coventry will be</p>

	internationally recognised as a compelling tourism destination of distinction; renowned for the quality and depth of its visitor experience across its diverse cultural, heritage , sports and events offer
Masterplan	<p>Pg 18 of the local plan “Masterplan Principles In order to support the delivery of sustainable development the importance of embedding a strong master planning framework within the Local Plan cannot be underestimated.”</p> <p>DS4 The indicative masterplan identified Hounds Hill and Corley Rocks SAM as “strategic viewpoints” Development on Hounds Hill would severely damage the remaining heritage view, of Keresley as stone age people may have seen it.</p>
Masterplan	<p>DS4, partc.vi iv. Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and</p> <p>Development at Hounds Hill would fatally disrupt the green and blue corridor required by this policy.</p>
Transport	<p>DS4 part C Keresley, The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.</p> <p>Traffic is forecast to be over 100% at Penny Park Lane and Exhall Rd – there is no transport capacity for further development in Keresley</p> <p>The CASM Transport assessments did not include Major additions to cumulative traffic from traffic coming from Birmingham Airport, nor the new international rail station near the airport at Arden Cross – for3cast to have thousands of parking spaces, 5000 new homes, and 75,000 new jobs. Airport traffic is forecast to grow forecast from 11m passengers/year to 27 m/yr by 2031 with 70-% of them arriving by car. –</p>

(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.

D

6. 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)

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)

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

Under the Aarhus Convention, the public has a right to participate in environmental decision making at an early stage before decisions are reached. I wish to speak under that right.

(Continue on a separate sheet /expand box if 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.

Appendix 1 – The Submission of CPRE Warwickshire COVENTRY LOCAL PLAN REG.19

OBJECTIONS AND COMMENTS BY C P R E WARWICKSHIRE
3 March 2025

Section 3 Overall Levels of Growth and the Duty to Co operate Housing Need Paras 3.6-3.9

The Plan applies the output from the HEDNA (2022) and proposes Local Housing Need for Coventry for the period 2021-2041 as 29,100 houses (1,455 per annum). The HEDNA covers Coventry and the five Districts of Warwickshire. However, for the Warwickshire Districts notably Warwick and Stratford-upon-Avon, which are at Reg.18 stage, new (Dec 2024) NPPF policy requires the use of annual housing numbers using the new standard methodology ('NSM') which are on a different basis.

This is all the more justified because the differences between old Standard Method (SM) and the NSM balance Coventry against the 5 Districts closely:

Dwellings per annum (DPA)

Coventry old SM: 3082 NSM: 1388 - 1694

Warwickshire (all 5 Districts) old SM: 2315 NSM: 3907 +1592

The HEDNA and the supplementary Review of Coventry's Housing Need (June 2024) conclude that the annual housing requirement for Coventry is 1455 houses (Para 3.9). This is very similar to the NSM's target (1388). There is joint working on housing requirements between Coventry and the Warwickshire Districts and the Duty to Cooperate requires this. Using two different methodologies for the one Housing Market Area and sub-region is not justified.

The housing need for Coventry should be 1,388 dpa; for the Plan Period 27,760 dwellings (not 29,100). This should not be described as a minimum.

Policy DS1(1)(a) should be amended to state

Policy DS1: Overall Development Needs

1. Over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental enhancements:-

a. 27,760 additional homes....

Policy DS2 Duty to Co-operate and partnership working

Policy DS2(1) states:

Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.

There is a surplus of supply of housing land in the City. Table 6.1 *Components of Housing Supply 2021-2041* states that supply is 31,493. This is a surplus of 3,730 against the Housing Need that the NSM projects for Coventry (27,760).

Detailed assessment for Keep Our Green Belt Green (KOGG) shows that supply is significantly underestimated. Densities are likely to be higher, windfalls are underestimated by 50%, and the supply of student accommodation (PBSA) is underestimated. The windfall allowance in Table 6.1 should be adjusted from 2,800 to 5,600 and windfall from PBSA development of 1,400 should be added.

The total supply should be given as 35,693 in the Plan Period (2021-2041).

Coventry's Local Plan has a potential surplus of 7,933 homes. The Plan will have capacity for 35,693 homes and a need under the NSM of 27,760.

Some sites in the Plan which are damaging and do not have any planning permission should be de-allocated, in Keresley Parish (Proposal H2.1 Keresley SUE). This could reduce the surplus by @1,000.

The Warwickshire Districts have a housing requirement which is above their supply (notably the South Warwickshire Plan, and Rugby). Coventry can provide for some of the housing numbers specified for them in the NSM.

Policy DS2 should be amended to state that

Coventry City Council will work with neighbouring authorities within its Housing Market Area to provide for some of the housing needs of those authorities where they have a requirement higher than their land supply while Coventry has housing land supply in excess of the requirement set by both the HEDNA and the Dec 2024 NSM.

The report 'Coventry Plan: Housing' (February 2025) by Gerald Kells is attached.

Section 6 Delivering Coventry's Housing Needs

Housing requirement

The Plan applies the output from the HEDNA (2022) and proposes Local Housing Need for Coventry for the period 2021-2041 as 29,100 houses (1,455 per annum). The HEDNA covers Coventry and the five Districts of Warwickshire. However, for the Warwickshire Districts notably Warwick and Stratford-upon-Avon, which are at Reg.18 stage, new (Dec 2024) NPPF policy requires the use of annual housing numbers using the new standard methodology ('NSM') which are on a different basis.

This is all the more justified because the differences between old Standard Method (SM) and the NSM balance Coventry against the 5 Districts closely:

Dwellings per annum (DPA)

Coventry old SM: 3082 NSM: 1388 - 1694

Warwickshire (all 5 Districts) old SM: 2315 NSM: 3907

Appendix 2 The submission of S McNaught on behalf of Sylvia and James McNaught

COVENTRY PLAN : HOUSING

REGULATION 19 CONSULTATION

3RD MARCH 2025

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

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

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

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

COVENTRY LOCAL PLAN REMOVAL OF LAND FROM THE GREEN BELT

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

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

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

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

APPROACH TO HOUSING NUMBERS FOR THE REGULATION 19 CONSULTATION

Adopting the approach taken by Gerald Kells to housing numbers ;

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

THE DUTY TO COOPERATE WITH NEIGHBOURING AUTHORITIES

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

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

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

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

RETURN OF LAND TO THE GREEN BELT WITHIN THE KERESLEY SUE

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

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

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

EXCEPTIONAL CIRCUMSTANCES

The following in my view amounts to exceptional circumstances;

1. **Subsequent evidence in the census and recent government reduction in housing requirements for Coventry bears out what objectors to the local plan stated , namely that the local plan was flawed in removing so much land from the green belt . This in itself calls for a review of green belt boundaries and return of land which still meets the NPPF tests in Para 134.**
2. **Coventry City Council's (CCC) attitude to its own local plan and its failure to comply with its own stated policies as detailed in the next paragraphs.**

3. Eastern Green SUE clearly states a total of 2250 (which on any reading of the word can only mean a maximum) . Yet CCC has approved 3250 . This is a total failure of CCC in applying its own local plan. The same approach should not be allowed to take place at Keresley . The plan should be transparent and fairly applied .
4. The Keresley SUE figure is 3100 . At the time of writing around 2950 dwellings have already received permission . Please see appendix A for the details. Land is still available within the SUE other than the land at Hounds Hill and to the north up to the Coventry boundary , particularly on land to the west of Fivefield Road (please see later on this).
5. The antithesis of good planning by CCC in not requiring a coordinated masterplan for the Keresley SUE .Representations were made prior to the adoption of the Coventry plan for the need for a phased approach so that members of the public and interested bodies could see what was happening and comment on it .
6. The antithesis of good planning by CCC in approving several uncoordinated parcels of land for residential permission . As such , it is unclear how, where and when the required infrastructure (which was a fundamental part of CCC's argument that the Keresley SUE would be " sustainable") .
7. The antithesis of good planning by Coventry in not requiring a coordinated access system so that all adjacent parts of the SUE would be able to link into a common road network . This brings me onto the issues relating to land to the west (or southwest in some cases) of numbers 15 to 47 Fivefield Road which seemingly does not have a point of access into other approved areas.
8. Several approaches have been made to homeowners of that stretch so that sufficient houses can be demolished to create an access point onto Fivefield Road . This suggests that there is a ransom situation going on . Had there been a coordinated plan as there should have been , this parlous situation would not have arisen.
9. This issue is exacerbated by the possibility that access will be taken through the site of demolished houses and where will that access be ? The only answer (and this is not supported) would be onto the south-eastern part of Fivefield Road (its south-eastern end) which Coventry has stipulated on existing permissions that only a limited number of houses should have access too.
10. This land will inevitably come forward during the plan period and is capable on its own of accommodating the remaining dwellings (approx. 150) in the SUE which does not have permission (3100 TOTAL minus approx. 2950 dwellings already approved) .
11. There are additional flaws in CCC's approach to its plan , namely not requiring provisions on granted permissions at Keresley to the requirement in HS1 of its plan to achieve enhanced connectivity between ancient woodlands . This is evident in relation to the two permissions granted next to ancient woodland ; adjacent to The Alders and adjacent to Bunsen's Wood . There has been no realistic attempt to achieve this in either permission.
12. In fact regarding the permission granted to Richborough Estates adjacent to Bunsen's Wood , this is exacerbated by approving a layout which is consistent with a road link to Hounds Hill . This is not so much enhancing connectivity between ancient woodlands as actually undermining it .

13. The next series of points are related to Coventry's failure either to impose enforceable conditions or to actually enforce or be able to enforce those that it has . This is again the antithesis of good planning.
14. Enforcement of traffic routes in and around Fivefield Road proved impossible necessitating a consultation to vary it informally .
15. Failure to properly enforce the condition requiring no development within a buffer next to the Alders ; development includes all forms of development , not just buildings , and the condition should have been enforced to prevent any development of any sort (including drainage systems to deal with surface water runoff).
16. Failure to consider the flooding impacts of granting permission to Richborough Estates for land running from Bunsen's Wood downwards to the lowest point in the area next to Ravenswood and Bennett's Road . An inadequate drainage system has been approved and CCC has reportedly purported to decline to take any action itself . Further development will only make worse an already dire situation.

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

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

Matters relating to exceptional circumstances are set out above .

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

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

OTHER IMPORTANT MATTERS

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

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

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

CONCLUSIONS

In conclusion;

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

Appendix 3

quotations from the Ecologists reports about The Alders, the Mere, and adjoining areas.

Warwickshire Biodiversity have conducted surveys for the Arden countryside since 2008 when Coventry and Solihull agreed to protect the Forest of Arden.

Keresley Mere “This type of pool was once widespread in Warwickshire but is now increasingly rare. The Keresley Mere is probably one of the least degraded water bodies in the City and is one of the few in the County which still has a semi-fluctuating water level which many rare plants and insects are adapted to.”

The Alders “This is the most species-diverse component, rare migrant birds observed all rare for Coventry. The Alders is the richest site in the city for aquatic invertebrates, and important site for breeding amphibians. The Alders has an above average list of plant species.....(list) which is characteristic of ancient woodland. The Alders is a very good example at County level of species rich wet woodland.”

Pikehorn Wood “Appears to have been woodland for many centuries which explains the presence of a number of ancient woodland indicators.

Bunsons Wood “Is one of the best fragments of semi-natural woodland surviving within the City boundary. In light of recent abuse its best future would be as a managed nature reserve, otherwise it could become seriously degraded.” (this refers to abuse by local people)

Recommendation. “This SINC remains one of the most biodiverse and attractive pockets of land within Coventry with the wet woodland among the best in Warwickshire (Alders). The habitats have changed very little in recent years and therefore its SINC status should be upheld. The

landowner is sympathetic to conservation (Queens College) and it would be hoped that the future would be as a nature reserve.”

I hope this information will help.

[REDACTED]

[REDACTED]

Appendix 4

Gerald Kells’s report for KOGG – attached separately to this email.