

Schedule 1

Statutory Consultee

Representor number **REP-0026**

Representor : **Mr K Bromley**

Company: **Keresley Parish Council**

Representation number: **1969** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

The overall scale of growth proposed for Coventry is over three and a half times average house building rates between 2001-2006, which was a favourable period for the house building industry. Given the current recession and slump in house building generally it is most unlikely to be achieved.

Officer Recommendation No change.

Representation number: **2176** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

Petition signed by over 3000 people. We the undersigned are in strong opposition of any intrusion by development within green belt in the Keresley area.

Officer Recommendation No change

Representation number: **2178** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

With regard to the Core Strategy document Keresley Parish Council would like to raise the following objections in line with the response deadline of 7th May 2009.

As the main thrust within this strategy would have a massive effect on our community and existing green belt areas we do not believe that the scale of housing being proposed for Coventry is appropriate. The figures being quoted are three and a half times greater than recent house building rates of Coventry City Council have made 2001 - 2006 it quite clear that their prime objective within the strategy is to use up/utilise all brown field sites before they commence or consider the use of green belt land. We at Keresley Parish Council have no confidence in Coventry City Council's ability or desire to follow this line. In fact we are very concerned with an apparent agenda which suggests green belt is an option to be considered now and not in the future as brown field sites decrease. As a Parish Council we have consulted with our electorate and find no support for this development which is totally within the Parish council boundary. We feel the green belt land in question, sites to the north and east of Tamworth Road, is of far more benefit to the people of Coventry for recreational activities and also to provide the last area of open countryside between Coventry and the boroughs of North Warwickshire, Nuneaton and Bedworth. This area of land should remain as it is - a benefit to everyone who wishes to use it. Currently there are under 300 houses in Keresley Parish to increase this to over 3000 is excessive to say the least. This will put another 6000 cars on local roads approximately 12,000 extra people, this added to plans of the neighbouring authorities is to great a burden for this area and will as you must be aware that the core strategy will create a massive urban development stretching from Nuneaton in the North to Stratford-upon-Avon, South Warwickshire. Why does the City Council believe this massive development sustainable and how long will it be before it is unsustainable because at the moment their efforts to sustain what they have is proving impossible.

There are 5000 empty properties in Coventry - why are they not being occupied.

Officer Recommendation No change

Statutory Consultee

Representor number **REP-1002**

Representor : **Mr G D Symes**

Company: **Kenilworth Town Council**

Representation number: **1715** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

LOCAL DEVELOPMENT FRAMEWORK - SUBMISSION CORE STRATEGY CONSULTATION

1. Thank you for sight of the documentation covering the above, which has been considered by the same working party which is covering the Regional Spatial Strategy. Several Members are dual-hatted and also serve on Warwick District Council (WDC) so they are familiar with the joint Green Belt document and other similar aspects, plus the material drawn-up by WDC.

2. With the RSS examination in public ongoing and further revisions to policies foreseen, Members have not drawn up a formal response but have commented that their views concerning the current Coventry Core Strategy are, at this stage, essentially the same as those expressed in relation to the RSS. Accordingly, they have asked me to forward the relevant RSS response sheets covering sub matters 8Ei and 8Eii.

3. The various proposals being suggested will, if implemented in full or part, have a significant impact on the whole sub-region and Members therefore particularly request they be kept informed on the progression of the Coventry Local Development Framework.

Matter 8Ei -

The questions in this part of the Enquiry relate in the main to our neighbours but most of the conclusions thereon will have an effect on Kenilworth as it is situated so close to the Coventry border. In those circumstances we have commented on some of the matters raised but will deal more fully with these when we respond to the Queries in 8E [ii].

For ease of reference we have paraphrased the queries raised by the Enquiry that we wish to comment on.

Q1. Are there obstacles to the achievement of the Coventry housing provision proposed?

We believe that there are considerable obstacles to Coventry achieving the housing provision required by the preferred option. Firstly it is evident, and we believe accepted, that there is insufficient land within the city limits for this to be self contained.

Further the rate at which development has taken place within the City has been in the main at a slower rate than that which has been achieved within Warwick District. The figures for the period 2002 to 2008 suggest that this was almost level pegging until the moratorium took effect in Warwick District in 2005. This was imposed as the District was attracting development way in excess of that planned for and in order to keep that development within the sustainable limits suggested by its Local Plan.

Kenilworth population and housing stock has more than doubled in size over the last 30/40 years and this has resulted in its envelope being completely full, with little land or no land for it to contribute without extension into the Green Belt. Its population has grown 132% since 1950 as against that of Coventry 22%, Leamington Spa 30% and Warwick 85%. The City has not had the attraction for developers that the Warwick District has suffered from and this has resulted in the District and Kenilworth having developed faster than provided for and resulted in the need for a moratorium being imposed until recently.

Further, it is difficult to see how Coventry, which has suffered from a serious loss of industry over the last few years in particular, could provide employment for such a large increase in housing and presumably the population following it.

Despite this it is evident that if these figures are imposed then there will be overspill into the surrounding area and this will endanger the Green Belt around Kenilworth as there is hardly any, if any, land left for development within the town which is corseted and protected by its Green Belt .

Officer Recommendation

No change

Statutory Consultee

Representor number **REP-1002**

Representor : **Mr G D Symes**

Company: **Kenilworth Town Council**

Representation number: **2355** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

Matter 8Ei cont....

Q2. The strategy indicates that Green Belt alterations would be required.

The Town Council does not feel that any further development could be accommodated within its boundaries or for that matter on the edge of its boundaries without considerable danger of creating an urban sprawl that would eventually stretch from the north of Nuneaton to the south side of Kenilworth and as such destroy the Towns integrity and character.

That position becomes much worse if one considers the Nathaniel Litchfield proposals which in the view of the Council are impractical, unnecessary, and completely unacceptable. The Green Belt around Kenilworth is effectively its boundary and this has resulted in the Town being developed to sit within it. This together with pressure for development has led to the Town losing much of the industry and employment that it had, and as a result it has insufficient provision for the employment of the people who actually live there. In the past this has meant that it was largely a dormitory for Coventry, but this has changed and the emphasis has moved more towards Leamington and Warwick in recent years.

Any development in and around the town would impose strains on all of the services and infrastructure that would be required for the servicing of those developments and would be contrary to the accepted need to build self sustaining communities with less need to commute.

Q3. Overspill resulting from the City.

To nominate overspill sites in any areas before the redevelopment of the sites identified within the City would be counter productive in that there would be a temptation to develop those sites in advance of those within the City. We believe that the problem has already been demonstrated quite clearly as the county area has been shown to be more attractive to developers.

This would be counter productive to a policy which as we understand it provides that the overspill from the City would be as a last resort when the provision available to the City has been used up.

Further since we do not know when that requirement will arise it need not and should not be identified at this stage but at a time in the future, when and if it becomes necessary. This has the advantage of not trying to see too far into the future but allowing decisions to be made at a time when account can be taken of the situation then existing.

Officer Recommendation

No change

Statutory Consultee

Representor number **REP-1002**

Representor : **Mr G D Symes**

Company: **Kenilworth Town Council**

Representation number: **2356** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

Matter 8Eii -

We believe that the proposals contained in the preferred option will damage the character of the Warwick District as a whole and those contained in the Nathaniel Litchfield Report are completely unsustainable and would ruin the District.

We will comment specifically on the proposals as they relate to Kenilworth but we are also mindful of the effects on our neighbours in the Warwick District and will also comment on these as they affect us all as a community which has now been joined together for 35 years and has become a close knit community.

For ease of reference we have paraphrased the queries we wish to comment on.

Q1. Are there obstacles to the provision of the housing proposed?

There are considerable obstacles to the provision of the amount of housing proposed in the preferred option within the District.

There is insufficient space to meet the requirement placed on the District within its Green Belt boundaries, and there will therefore be a considerable intrusion into the Green Belt area which has only been approved and finalised within the last few months on the completion of the Local Plan. Many years work on this latest edition of the Local Plan will therefore be undone and the areas which were thought to be safe from development will be opened up and the reasons for those areas being set aside and the dangers they were to protect will be disregarded

Q2. Is local specificity required?

The Town Council supported by the District has for many years endeavoured to keep an area of Green Belt between itself and the city of Coventry so as to prevent the creation of the urban sprawl that its loss would create. This area is extremely slim in parts and in places only the width of a field.

The location of the Green Belt in relation to Kenilworth is therefore an essential element in the protection of the Town from that danger. We believe it is also in the interests of the City to contain its development as far as possible within its boundaries.

When and if any overspill from the City becomes necessary it should be sited in locations where it is still possible to keep a separation from its neighbours.

Any intrusion into the areas around the Town will endanger that separation and will lead, we believe, to pressure to fill in the gap as the Town has proved extremely attractive to developers over the last 40 years. This has led to the Town being completely developed within its boundaries with little or no space left.

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Q3. The housing provision is significantly below that projected.

We do not believe that the figures suggested by Nathaniel Litchfield are possible without building another town the size of Leamington Spa within the District.

Their figures appear to be demand based more on attraction than on need. This is because the District and Kenilworth have developed at a greater rate in the main than has Coventry due to its attraction to developers. This proposal does not in our view therefore serve the real need which exists within the County.

This proposal would also be counter productive as the need is to see that development is directed to Coventry in the first instance to insure it does not overspill into the county until the City has been fully developed.

The danger of the Litchfield proposals is that the possibility of an urban sprawl from Nuneaton to Leamington Spa becomes a distinct probability. It would lead to the destruction of a part of Warwickshire which is increasingly becoming a tourist attraction with the Castle in Kenilworth becoming a very busy and visited attraction.

We believe that there is no economic justification for this type of development as far as Kenilworth is concerned as it would make it even more of a dormitory Town.

Officer Recommendation

Statutory Consultee

Representor number **REP-1002**

Representor : **Mr G D Symes**

Company: **Kenilworth Town Council**

Representation number: **2358** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

Matter 8Eii cont...

Q4. Employment provision in the area.

Our Town has little or no employment opportunities. In fact it has lost employment land to housing development. Currently there are some 5,000 jobs and an employment population of 15,000. These figures, if anything, overstate the position considerably as many of those jobs, particularly the lower paid ones, are taken by people from outside the Town who commute in every morning e.g. shop assistants and care home workers etc.

Little additional employment is available or foreseen in Coventry, which is not only suffering the current downturn, but has previously suffered the considerable loss of large employers such as Peugeot and Jaguar. There appears to us to be little requirement for larger numbers of houses within the City.

Additional housing of the sort proposed by the preferred option would create a large increase in population without any additional employment and lead to a large increase in traffic in and out of the town on roads which are frequently blocked at this time.

It would also be contrary to trying to develop communities which are self reliant in this respect and if the places of employment were outside the town they would impose additional stress on neighbouring communities.

The larger proposals would further exacerbate this problem to an unacceptable level.

Q5. Are there infrastructure problems?

As far as infrastructure is concerned the type of additional development that may affect Kenilworth would produce considerable infrastructure problems as what is suggested is an increase in the size of the Town approaching 20%.

The Town has recently undergone a renewal of its Sewerage System, which had become necessary because of its age and the lack of capacity as a result of the large amount of development within its boundaries over the last 30 years.

This was however only sufficient to meet its current needs and as such a very large new sewerage system would be needed together with roads to service the area.

The Town, because of its history and development over the years, has narrow roads through out which would not lend them themselves to further large connections. Without such connections to the town centre, where nearly all shops and service are situated for the same historical reasons, there would be a real danger of the area concerned being isolated from the town and lead to residents finding it easier to use facilities in adjoining areas and thus defeating the idea of reducing commuting of all types.

The road system could not cope with further connections to the town centre and any traffic generated would be forced into the existing narrow roads, which are already overburdened with little or no opportunity any where for widening or alternative connections.

The Town has the benefit of the close proximity of the University of Warwick but this has a considerable effect on the local infrastructure. In particular the effect of traffic travelling to and from the campus is considerable and already requires remedying.

It should also be borne in mind that a considerable amount of accommodation is already planned for the University and for this not to be taken into account in respect of the totals required from our area seems completely illogical.

Further, because of its location on major routes, the Town already suffers as a thoroughfare for workers traversing the District and to Coventry and as far afield as Birmingham, as well as local residents travelling to those destinations.

Officer Recommendation

Statutory Consultee

Representor number **REP-1002**

Representor : **Mr G D Symes**

Company: **Kenilworth Town Council**

Representation number: **2360** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

Matter 8Eii cont...

The provision of schools and medical services is only adequate for the existing population and these, together with all other relevant services, would need to be provided and the land found to accommodate them.

The proposals would also lead to the loss of a very important recreational area which provides rugby, cricket and other sports facilities which are heavily used and important to the youth of the Town. Again there would be a need to replace these facilities and that would require further land to be provided.

The current development has lead to areas of flooding within the town and again we would be concerned that further development would exacerbate this existing problem.

Q6. Local specific issues that require addressing.

All of the issues raised show we believe the absolute importance of the retention of the Green Belt around Kenilworth and the avoidance of any further substantial development.

Officer Recommendation

Representor number **REP-1003**

Representor : **Meriden Parish Council**

Company: **Meriden Parish Council**

Representation number: **1716** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

Comment from Councillor M Lee -

As I stated at the last PC meeting, I think we should support the views of the CPRE (document recently on circulation). I believe they stated the proposed 33,500 dwellings was a 54% increase on the original strategy. Only 22,760 dwellings are planned for urban/brown belt areas. A further 3,750 are identified from green belt. So where will the remaining 6,990 dwellings be situated? Green belt no doubt, which would mean 32% would be allocated to green belt sites. But if you look at the wordings from the document the intended green belt expectations are actually for 14,450 dwellings (39%):

The Strategic Housing Land Availability Assessment (SHLAA) has indicated that the existing built-up area of the City can accommodate a net increase of approximately 22 800 dwellings on brownfield and greenfieldsites. New housing developments will first and foremost be directed to sustainable locations within the built-up area to assist regeneration and utilise existing infrastructure. This means that further land will need to be identified to accommodate approximately 10 700 dwellings within the plan period and will necessitate green belt release. The City Council has very carefully considered the capacity within the City to make provision for development in its Green Belt areas. A Sub-Regional Joint Green Belt Study and a Coventry Green Belt study have informed proposals. The City Council has accepted the recommendations of the Joint Green Belt study in considering further areas for release. Based on further analysis of those areas, allocations to provide for a further 3 750 dwellings are proposed at an Eco-suburb at Keresley, with further Green Belt allocations around Tile Hill station (Duggins Lane and Cromwell Lane), around Lentons Lane (at Hawkesbury and sutton Stop) and at Gibbet Hill. They want to encourage people to live and work in the city, so they should concentrate on the rejuvenation of the city and its dwellings in and around the city centre. If businesses move to Coventry, I would imagine employees with families would prefer to live in the green belt sites, defeating the aim of the core strategy.

Comment from Councillor B Kipling -

The proposal is over ambitious and is unlikely to be successful. Where would the extra people work?

Comment from Councillor R Weaver -

We must protect the green belt at all costs especially between Cov and Balsall Common and between Cov and Meriden. Transport links must improve so 900 bus needs to be more frequent! Need to ensure that extra traffic does not use Meriden as a through route instead of A45.

Officer Recommendation

No change.

Statutory Consultee

Representor number **REP-1017**

Representor : **Miss Rachel Bust**

Company: **The Coal Authority**

Representation number: **1789** Representation in regard to : **Policy EQ 1 - Ensuring High Quality Design**

Verbatim Submission

The Coal Authority would like to see the addition of a criteria regarding ground stability to respond to the advice in PPG14. We would suggest the following:
"consider any former land uses, contamination and any ground stability issues that may arise and ensure that these are properly remediated to facilitate new development."
Reason - To meet the policy requirements of PPG14 on ground stability

Officer Recommendation

SG1 new bullet "ground stability and contamination issues will be appropriately remediated".

Representation number: **1790** Representation in regard to : **7: Protecting and Improving Environmental Quality**

Verbatim Submission

This section should include PPG14 in the list of relevant national planning guidance.

Officer Recommendation

Recommend inclusion of PPG14 in the list of relevant planning guidance

Representation number: **1791** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

The Coal Authority has no particular comment to make on specific proposals, except to indicate that the Regeneration Area in the north-east of the City and the Keresley Eco-Suburb lie in areas where previous mining activity have taken place, therefore mining legacy issues may be present. However we are aware that the City Council have obtained a number of mining reports for sites being advocated within the LDF and therefore The Coal Authority considers that the City Council has taken account of a relevant evidence base in devising its proposals and as such The Coal Authority is confident that that the Council are proposing a sound development strategy. It should be remembered that the use of land for green infrastructure must also be considered with regard to the public safety issues that mining legacy can present in the same way as sites proposed for actual built development.

Officer Recommendation

No change.

Representation number: **1793** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

The Coal Authority has no particular comment to make on specific proposals, except to indicate that the Regeneration Area in the north-east of the City and the Keresley Eco-Suburb lie in areas where previous mining activity have taken place, therefore mining legacy issues may be present. However we are aware that the City Council have obtained a number of mining reports for sites being advocated within the LDF and therefore The Coal Authority considers that the City Council has taken account of a relevant evidence base in devising its proposals and as such The Coal Authority is confident that that the Council are proposing a sound development strategy.

Officer Recommendation

No change.

Representation number: **1794** Representation in regard to : **POLICY SG1 - DEVELOPMENT**

Verbatim Submission

The Coal Authority supports the wording of this policy and the approach it takes to ensuring public safety, it is considered an effective policy framework through 'which to address mining legacy issues within the City.

Officer Recommendation

No change.

Statutory Consultee

Representor number **REP-1017**

Representor : **Miss Rachel Bust**

Company: **The Coal Authority**

Representation number: **1795** Representation in regard to : **Objectives of Core Strategy**

Verbatim Submission

Whilst most past mining is generally benign in nature potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area where coal exists near to the surface, including existing residential areas. The new Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur. The Coal Authority has records of over 178,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. It is estimated that as many as 2 million properties of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas needs to take account of the coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.

Officer Recommendation

SG1 new bullet "ground stability and contamination issues will be appropriately remediated".

Representation number: **1797** Representation in regard to : **Policy SG5 - Safeguarding Mineral Resources**

Verbatim Submission

As you will be aware from our previous response in December 2008, the Coventry area has previously been subjected to deep coal workings (particularly in the northern and western part of the plan area) this means that there are likely to be mine entries within the plan area, the location of which are important to ensure public safety. The eastern side of the plan area contains outcropping coal seams which means coal rises up to the surface although it has not been worked, it may be considered in the future if the economic circumstances mean this coal is viable for extraction. This eastern area also contains many mine entries in addition to the shallow coal resources. There is also the presence of the Warwickshire thick coal which is a coal seam which is prone to spontaneous combustion. Therefore the environment of Coventry has mining legacy which can give rise to public safety risks from shallow coal collapses, mine entries, spontaneous combustion and potentially rising minewater and gases.

The Coal Authority is keen to ensure that there is an awareness of the mining legacy matters and their location, identified through the Core Strategy as this is a spatial issue which is locally distinctive to the Coventry plan area.

The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In cases where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.

As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.

Officer Recommendation

Noted.

Statutory Consultee

Representor number **REP-1019**
Representor : **Mr Andrew Collinson**

Company: **Nuneaton and Bedworth Borough Council**

Representation number: **1800** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

The overall strategy is generally in accordance with national guidance, the Regional Spatial Strategy and CSW Sub regional strategy. We do have the following concerns in terms of policies on sustainable growth. The phasing of greenfield sites should be in accordance with the policy as set out in the RSS preferred option para 3.43, 3.45 and policy CF4 of the plan. Regard must be made in respect of this element of the regional document in respect of the policy wording. It is therefore likely bearing in mind the current economic climate that brownfield sites are likely to be more difficult to develop and therefore there will be severe pressure to develop greenfield sites especially those within the urban area allocations totalling some 1,120 dwellings and also the safeguarded land totalling some 3,750 dwellings. Without robust phasing policy there is no clear mechanism for the release of safeguarded sites included in the draft Core Strategy. PPS3 para 55 also states that LPA's should identify developable sites for years 6-10 and where possible for years 11-15 it is not clear in the document how these are identified within the document. Without a robust phasing policy it is likely to have an impact on the urban renaissance of urban areas within Coventry and adjacent Borough's. We have a concern that the strategy is insufficiently prescriptive in terms of phasing and identifying sites. It is understood that housing land will be required within adjoining areas to meet the level of housing as identified within the emerging RSS. It will be important therefore for your authority to demonstrate through the examination process that the Core Strategy has maximised the potential for new housing development within the conurbation in accordance with the regional and sub-regional policy approach

Officer Recommendation No change

Representation number: **1802** Representation in regard to : **Policy SG 15 : Provision of Employment Land and Premises**

Verbatim Submission

In respect of employment land, the draft RSS (Policy PA6) requires metropolitan districts to provide and maintain a minimum 5 year reservoir of readily available employment land and sets out indicative long-term, employment land requirements (employment land is defined as land allocated for business classes B1, B2 and B8). Coventry's, reservoir requirement is 82 ha and the longer-term requirement is 246 ha. The draft Core Strategy is committed to maintaining the reservoir amount but not the entire longer-term amount. There is no indication about strategic allocations of the longer-term requirement. The draft Core Strategy should clarify how sites will be brought forward to maintain the minimum reservoir in accordance with draft RSS requirements. The strategy should also clarify what the requirements are until 2026 and how and when sites will be brought forward to maintain the minimum reservoir in accordance with the RSS. Again it is understood that employment land within adjoining areas (Nuneaton and Bedworth, Warwick District and Rugby Borough Council) will be required to meet the level of employment as identified within the emerging RSS and evidence should be provided to indicate the likely quantum of this development. The emerging RSS indicates that there may be a requirement for a Regional Investment Site (RIS) (PA7 para F) within or close to the Coventry and Nuneaton Regeneration Zone. No evidence has been provided to indicate that this can not be provided within the Coventry area. If the Core Strategy is based around economic growth, then there should be evidence and commitment to provide a RIS backed up by policy framework.

The emerging RSS indicates that there may be a requirement for a Regional Investment Site (RIS) (PA7 para F) within or close to the Coventry and Nuneaton Regeneration Zone. No evidence has been provided to indicate that this can not be provided within the Coventry's area. If the Core Strategy is based around economic growth, then there should be evidence and commitment to provide a RIS backed up by policy framework.

Officer Recommendation

Insert new sentences to end of paragraph to read: "The Ansty Regional Investment Site (RIS) is not included within the 'minimum reservoir'. It adjoins the north-eastern boundary of the city, and with Ericsson now in occupation, it is becoming increasingly likely that additional RIS to serve the Regeneration Zone (RZ) will be required during the Plan period. RSS identifies the key characteristics of RIS. The Core Strategy has not identified a site that satisfies the criteria and provision should be considered beyond the city boundary."

Statutory Consultee

Representor number **REP-1026**

Representor : **Mr Gary Stephens**

Company: **Warwick District Council**

Representation number: **1825** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

In relation to the release of housing land, the District Council considers Policy SG 8 and supporting paragraph 6.37 to be sound. Prioritising land within the urban area, including as a first priority previously developed land, for housing is consistent with PPS3 (paragraphs 36 and 38) and conforms to the general approach of the Spatial Strategy of the adopted Regional Spatial Strategy (RSS) and its emphasis on an urban renaissance of the MUAs, such as Coventry, within policies UR1, CF1, CF3, CF4 and CF6. Notwithstanding the above, it is recognised that some greenfield land adjoining the urban area will be required during the plan period in order to meet the level of housing provision within the emerging RSS. As a first priority, any greenfield land required should be within the local authority area in accordance with Policy CF1 and the sub-regional strategy as set out in the emerging RSS Phase Two Revision Draft. It will be important therefore for your authority to demonstrate through the examination process that the Core Strategy has maximised the potential for new housing development within the conurbation in accordance with the regional and sub-regional policy approach. However, subject to the above testing, this Council accepts that it may have to release land for housing later in the plan period from the Green Belt within Warwick District in the event that the potential for new housing development in Coventry cannot meet its level of housing provision within the emerging RSS. We would look to undertake this through our own emerging Core Strategy. In order for us to meet the policy requirements of PPS3 and the adopted and emerging RSS, this Council would therefore look to your authority to provide greater clarity in due course on how many houses will be required outside of your administrative area and when they will be required during the plan period in order to meet your level of housing provision within the emerging RSS.

Officer Recommendation

Support welcomed.

Representation number: **1826** Representation in regard to : **Policy SG 15 : Provision of Employment Land and Premises**

Verbatim Submission

In relation to the provision of employment land, we consider your Policy SG 15 is sound in ensuring locations are available for development to meet the emerging RSS requirements for readily-available employment land. This approach is consistent with PPS1 in terms of sustainable economic development and conforms with Policy PA6 of the adopted RSS. It is noted in paragraph 6.72 that additional land may need to be allocated or safeguarded to maintain this supply through the course of the plan period and, in due course, help meet longer term needs once the emerging RSS is adopted. This includes land not only within Coventry, but also potentially within Warwick District in accordance with the sub-regional strategy of the emerging RSS. This Council are keen to understand how your Council propose to identify additional land through your Local Development Framework process and clearly we will need to engage in that process with you. As with housing, therefore, this Council would look to your authority to provide greater clarity in due course on how much employment land will be required outside of your administrative area and when it may be required during the plan period in order to meet your longer term requirements within the RSS.

Officer Recommendation

Insert new paragraph 6.74A following 6.74 to read: "On 31st March 2008, the supply of employment land with planning permission (including those under construction) in Coventry was 36.26 hectares. In accordance with Footnote d to Draft RSS Policy PA6A - Employment Land Provision - 39.28 hectares at former Peugeot Ryton should also be included within Coventry's 'readily available' land supply because it has planning permission that is currently under construction.

The requirements of the 82 hectare 'minimum reservoir' have therefore been met. As these sites are developed out, allocated sites set out in Table 4: Employment and Mixed-Use Allocations can move into the minimum reservoir. The allocated sites may be treated as readily available, but the reserve sites within the Keresley Eco-Suburb are not readily available until such time as planning permission has been granted for their development."

Statutory Consultee

Representor number **REP-1035**

Representor : **Ms Allison Crofts**

Company: **Natural England**

Representation number: **1845** Representation in regard to : **Policy EQ 1 - Ensuring High Quality Design**

Verbatim Submission Natural England welcomes the inclusion of these policies

Officer Recommendation Support welcomed

Representation number: **1846** Representation in regard to : **Policy EQ 3 - Green Infrastructure**

Verbatim Submission Natural England welcomes the inclusion of these policies

Officer Recommendation Support welcomed

Representation number: **1847** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission Natural England welcomes the inclusion of these policies

Officer Recommendation Support welcomed

Representation number: **1848** Representation in regard to : **TABLE 6 INDICATORS AND TARGETS**

Verbatim Submission Natural England believes that the monitoring target for Policy EQ5 should aim not only to increase LBAP species but also area of LBAP habitat and area of LBAP habitat in positive conservation management.

Officer Recommendation Insert indicator under Policy EQ 5 to read: % change in land area (hectares) of sites identified in the LBAP" Target to read "No net loss"

Representation number: **1849** Representation in regard to : **4.5**

Verbatim Submission Natural England believes that core strategy objective 10 is unsound as it will not be sufficiently effective in improving Coventry's environment and tackling climate change.

Officer Recommendation Add new bullet point to Theme 10 to read: "To create a sustainable city that respects its heritage and with a green infrastructure network of resilient, multifunctional and bio-diverse natural green spaces, parks, wildlife habitats and open spaces, that provides benefits for the economy, environment and the people."

Representor number **REP-1044**

Representor : **Leslie Morris**

Company: **National Grid**

Representation number: **1874** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission Concern with Local Wildlife Site designation close to Sub-station at Hawkesbury

Officer Recommendation Amend para 7.63 to acknowledge National Grid's concerns, but no change to designation.

Statutory Consultee

Representor number **REP-1057**

Representor : **Mr Bob Sharples**

Company: **Sport England**

Representation number: **1926** Representation in regard to : **3.15**

Verbatim Submission

The current Green Spaces Strategy is not currently robust enough. And therefore to rely on it as it stands will make the core strategy unsound

Officer Recommendation

page 43, Policy SG 7 : Provision of New Housing
amend second paragraph to read Development will normally be:

Amend to read: "Development will normally be:

- within 1km radius of a primary schools;
- within 2 km radius of local medical services;
- within 2 km of a district centres;
- within 400m of a bus [route] stop with a reasonably frequent service; and
- accessible to indoor and outdoor sports facilities and green space in accordance with the Council's Green Environment Policies".

page 84 para 7.41 add line 4 after spaces, indoor and

page 84 para 7.43 add The same Green Space can sometimes contribute to more than one category in the Standards.

pages 85 - 89, move from policy boxes commentary about existing deficiencies and edit. Delete

The recommended minimum standards are: and insert into Policy box

Coventry Green Space Minimum Standards

page 88 delete in quality policy box "This needsof and ...Sports grounds need to adhere to the above so as

to leave the statement changing and showering facilities should be provided page 107 para 9.20

end of fourth line add indoor sports facilities and para 9.21 fourth line after communities. add SPD

will consider further provision of indoor and

outdoor sport.

Policy SC3 second para line 2 add after premises and or facilities

Statutory Consultee

Representor number **REP-1057**

Representor : **Mr Bob Sharples**

Company: **Sport England**

Representation number: **1927** Representation in regard to : **Policy SC 1: The Network of Centres**

Verbatim Submission

Coventry does not yet have robust facilities strategy. Therefore difficult to determine where any new sports facilities should be located if they are need. Whilst Sport England supports a sequential approach to locating sports facilities within a network of centres it should not be the overriding policy issue. It should be based on a facilities strategy

Officer Recommendation

page 43, Policy SG 7 : Provision of New Housing
amend second paragraph to read Development will normally be:

Amend to read: "Development will normally be:

- within 1km radius of a primary schools;
- within 2 km radius of local medical services;
- within 2 km of a district centres;
- within 400m of a bus [route] stop with a reasonably frequent service; and
- accessible to indoor and outdoor sports facilities and green space in accordance with the Council's Green Environment Policies".

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page 84 para 7.43 add The same Green Space can sometimes contribute to more that one category in the Standards.

pages 85 - 89, move from policy boxes commentary about existing deficiencies and edit. Delete

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Coventry Green Space Minimum Standards

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to leave the statement changing and showering facilities should be provided page 107 para 9.20

end of fourth line add indoor sports facilities and para 9.21 fourth line after communities. add SPD

will consider further provision of indoor and

outdoor sport.

Policy SC3 second para line 2 add after premises and or facilities

Representation number: **1928** Representation in regard to : **7.47**

Verbatim Submission

The work around the playing fields element which is contained within the Green Spaces Strategy is not robust enough. Therefore the minimum standards which have been set out are difficult to fully justify

Officer Recommendation

Insert new sentences at end of paragraph to read: "School playing fields can also contribute to this provision. Policy EQ4 provides a basis for consideration of any proposals involving loss of green space. Based on the quantitative standards for sports grounds, the main deficiency is in the North West Neighbourhood Area. There is a good distribution of sports pitches across the city and the level of community use needs to be established to enable accurate supply and demand calculations to be established." Delete from "Based on the quantitative;" box from table.

Statutory Consultee

Representor number **REP-1057**

Representor : **Mr Bob Sharples**

Company: **Sport England**

Representation number: **1929** Representation in regard to : **Policy EQ 4 - Parks, Open Space, Outdoor Sports and Recreation Facilities**

Verbatim Submission

The current green Spaces Strategy is not currently robust enough. Both the indoor and outdoor sports facilities are at risk as the supply and demand elements with the strategy are not sufficiently robust. Also regarding sports facilities there is robust baseline information that the current facilities are in the right location. The issue of quality for both indoor and outdoor facilities has not been adequately addressed

Officer Recommendation

page 43, Policy SG 7 : Provision of New Housing
amend second paragraph to read Development will normally be:

Amend to read: "Development will normally be:

- within 1km radius of a primary schools;
- within 2 km radius of local medical services;
- within 2 km of a district centres;
- within 400m of a bus [route] stop with a reasonably frequent service; and
- accessible to indoor and outdoor sports facilities and green space in accordance with the Council's Green Environment Policies".

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pages 85 - 89, move from policy boxes commentary about existing deficiencies and edit. Delete

The recommended minimum standards are: and insert into Policy box

Coventry Green Space Minimum Standards

page 88 delete in quality policy box "This needsof and ...Sports grounds need to adhere to the above so as

to leave the statement changing and showering facilities should be provided page 107 para 9.20

end of fourth line add indoor sports facilities and para 9.21 fourth line after communities. add SPD

will consider further provision of indoor and

outdoor sport.

Policy SC3 second para line 2 add after premises and or facilities

Statutory Consultee

Representor number **REP-1066**

Representor : **Rohan Torkildsen**

Company: **English Heritage**

Representation number: **1953** Representation in regard to : **POLICY SG1 - DEVELOPMENT**

Verbatim Submission

You may wish to clarify the emphasis on Green Infrastructure over other matters for example the historic environment.

Officer Recommendation

Amend bullet point to read: "green infrastructure and the historic environment are not prejudiced;"

Representation number: **1954** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

We obviously acknowledge that without action to mitigate and respond to its impacts climate change will cause severe disruption to society and inflict serious impacts on the environment, including the historic environment. Today's built environment will need to be adapted to become more resilient to change over the coming years and different technological solutions may require new developments.

In this context, however, poorly considered policies for adaptation and mitigation can have a damaging effect on historic buildings, sites and landscapes. Such impacts can diminish quality of life and the important contribution our cultural heritage makes to society. These impacts should always be taken into account when policy is being formulated and English Heritage is committed to working to avoid or minimise any adverse impacts, while delivering the necessary changes.

We therefore recommend this section of the Core Strategy considers how the historic environment will be affected by climate change and provide an integrated policy response and refer in policy SG2 to the above considerations.

Officer Recommendation

Amend second sentence to read: "Unless it can be demonstrated on technical, conservation and/or economic viability grounds to be unachievable, then the following will be required:". Amend first bullet point to read: "All development will demonstrate" Amend third bullet point to read: "more than 50 dwellings to explore" Amend fourth bullet point to read " more than 100 units will adopt" Amend sixth bullet point to read: "All developments to be carbon"

Representation number: **1955** Representation in regard to : **Policy SG 3 Waste Management**

Verbatim Submission

We welcome the requirement to integrate in the design of new buildings facilities for the storage, reuse, recycling and composting of waste.

Officer Recommendation

Amend third bullet point of policy to read: "Proposed new or expanded facilities will consider the Best Practicable Environmental Option (BPEO) for each waste stream. The BPEO is the option that provides the most benefits for the least environmental damage at acceptable cost. [be assessed against the following c] Criteria will also include:

- accessibility to the source of waste arisings;
- the type and volume of waste;
- the extent to which the re-use and recycling of any waste is facilitated;
- the use of raw materials;
- the pollution potential of unavoidable waste;
- the proposals for disposal of unavoidable waste in an environmentally acceptable manner; and
- the implementation of transport connections including the use of rail and water where possible, and lorry routes"

Amend final section of policy to read: "Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management. This can include the reuse and recycling of construction and demolition waste, the treatment of hazardous wastes and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting."

Statutory Consultee

Representor number **REP-1066**

Representor : **Rohan Torkildsen**

Company: **English Heritage**

Representation number: **1956** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

English Heritage is concerned by the intention to designate a variety and number of individual sites across the city in this DPD. Can they all be considered to be strategic sites?

Has the community been adequately engaged in their suggested allocation? Where is the transparent assessment of their suitability in respect of the historic environment, for example?

It appears a number of sites have only just come forward at the submission stage and via, perhaps, the SHLAA process although the SHLAA as you rightly point out is only intended to suggest potential development sites. The methodology to identify and consider such sites is therefore rather broad and limited unlike the more detailed and considered evaluations that would be expected for a Site Allocations DPD. An example of our concern is the suggested allocation for 390 new homes in the greenbelt off Cromwell Lane, an area with a number of listed buildings. Whilst the presence of such assets need not necessarily prejudice the principle of such change, the Core Strategy does not indicate how this important issue has been considered. There is no indication how the significance of the historic environment is affected; has informed preferences nor how the

community and stakeholders have been engaged to inform the allocation. What evidence has been gathered and applied is unclear. There is no confidence any suggested allocated site preserves or enhances the historic environment as it appears not to have been a consideration. The Core Strategy can only therefore be considered to be unsound as it has not been founded on robust and credible evidence or demonstrably consistent with national policy.

The Sustainability Appraisal has not considered the relative impact of individual allocations but of numerous sites collectively. The impression is therefore misleading and the exercise appears inconsistent with guidance on their preparation.

The Core Strategy should be a strategic framework that indicates the broad environmental capacity of Coventry to accommodate growth. Individual sites should be identified, considered and proposed for designation through a separate and more focussed DPD.

Officer Recommendation

Table 2 amended to refer to sites over 100. Appendix 3 includes description of sites that reports need to sensitively design to have regard to listed buildings at Cromwell Lane. Add (HER) map of designated heritage sites to evidence base.

Representation number: **1957** Representation in regard to : **Policy SG 18 : Warehousing (B8)**

Verbatim Submission

The landscape impact of voluminous warehousing can be extreme. This policy should therefore emphasize the need for design policy compliance.

Officer Recommendation

No change

Representation number: **1958** Representation in regard to : **Policy SG 19: City Centre Strategy**

Verbatim Submission

We note many positive features within this section and in particular support the preparation of an AAP to understand and inform positive change.

Officer Recommendation

Support welcomed

Representation number: **1959** Representation in regard to : **6.31**

Verbatim Submission

A caveat should be included within sections 6.31 and 6.34 to ensure consideration is given to the retention and reuse, rather than demolition and redevelopment, of existing buildings of significance and value to the character and heritage of the city whether or not they are formally designated as historic assets.

Officer Recommendation

6.31 Insert new bullet point following first bullet point to read: "retention and reuse, rather than demolition and redevelopment, of existing buildings of significance and value to the character and heritage of the city;"

6.34 Insert new sentence at front of paragraph to read: "Consideration will be given to the retention and reuse, rather than demolition and redevelopment, of existing buildings of significance and value to the character and heritage of the city."

Statutory Consultee

Representor number **REP-1066**

Representor : **Rohan Torkildsen**

Company: **English Heritage**

Representation number: **1960** Representation in regard to : **Policy EQ 1 - Ensuring High Quality Design**

Verbatim Submission

We welcome and support the commitment of Coventry to a high quality and improved environment and particularly the emphasis at 7.13 Protecting our Heritage and policy EQ1.

Consideration of the historic environment however goes beyond matters purely of design. Might a separate section and policy be considered with a specific indicator? The Core Strategy could include a locally distinctive policy for the historic environment to ensure the effective delivery of the vision, objective and the local authority's strategy for the historic environment.

A core policy could set out;

- How those aspects of the historic environment considered to contribute to the distinct identity of the area will be safeguarded or enhanced;
- How the threats to historic assets in the area will be managed; and
- How the historic environment will be used to assist in the delivery of other spatial objectives.
- How the evidence base for the historic environment links to the Core Strategy policy e.g. Conservation Area Appraisals

Officer Recommendation

Penultimate bullet point: Amend to read "conserve, restore and/or enhance biodiversity; and"

Representor number **REP-1074**

Representor : **Binley Woods Parish Council**

Company: **Binley Woods Parish Council**

Representation number: **1995** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

The Parish Council have no objections to their proposals as currently set out.

Officer Recommendation

Noted

Statutory Consultee

Representor number **REP-1087**

Representor : **Christine Hemming**

Company: **British Waterways**

Representation number: **2020** Representation in regard to : **Policy EQ 3 - Green Infrastructure**

Verbatim Submission

BW supports this policy
British Waterways support the role the canal corridor can play in the creation, protection and enhancement of the natural environment, ecology and biodiversity. We would however, add that this "green" role of the Canal Corridor as part of any green network is only one of a number of roles as detailed earlier in this response and should be consistent with the proposed canal corridor
dpd.
The Coventry Canal and Oxford Canal can act as a catalysts to urban and rural regeneration in the
area, through a corridor wide approach. British Waterways would support the institution of a Canal Corridor Study/Area Action Plan around the canal corridor and therefore objects to purely protecting the green infrastructure. This will emphasise the multifunctional nature of the waterways
and assist in reconciling the ecological and other environmental objectives of the Core Strategy, whilst ensuring that this does not prejudice the potential for the regeneration and development of the land adjacent to the canals themselves, nor sterilise or limit activity along their corridors. This is wider than the policy as proposed which is to "not permit development which compromises the integrity of the overall green infrastructure framework."
Realising the potential of inland waterways is dependent upon achieving appropriate waterside uses; appropriate high quality of design; access; and, provision of good quality, secure mooring bases and boating facilities. This Spatial Strategy is therefore of critical importance to the inland waterway network, in order to encourage appropriate regeneration and uses along the canal corridors and to determine suitable locations for mooring bases and boating facilities. British Waterways would welcome as a first stage the illustration of the canal on the plans within the core strategy.

Officer Recommendation

Minor change: proposals map - amend legend to read "canal and provisional wildlife sites"

Representation number: **2021** Representation in regard to : **Policy IM 1: Developer Contributions for Infrastructure**

Verbatim Submission

British Waterways supports the use of Cil and 106 payments for support and integration of the canal corridor.
British Waterways suggests that the submission document is unsound on the following grounds.
1. Sustainability pg 37 on the grounds it may not be the most appropriate strategy when considered against the reasonable alternatives.
British Waterways fully supports all the points on sustainability but would further add that the role of the waterway as a source of heating and cooling for water based heat pump technology and micro hydroelectric power generation should be acknowledged.

Officer Recommendation

Minor change: Add to 6.9 "the canal that meanders from the city centre to north of the city could provide a valuable source of heating and cooling, using water based technology and micro hydroelectric power generation.
Minor change: Para 7.38 "..... network. The green corridors should not preclude appropriate development opportunities but rather such developments should not harm the integrity of the corridor..."

Statutory Consultee

Representor number **REP-1089**

Representor : **Mark Pearce**

Company: **Advantage West Midlands**

Representation number: **2025** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

Thank you for consulting Advantage West Midlands (the Agency) on the Submission Core Strategy for the City of Coventry.

The Agency's key role is to set the agenda and provide leadership for delivering sustainable economic development and growth in the region. The principal way it does this is through the preparation and delivery of 'Connecting to Success' the West Midlands Regional Economic Strategy (hereafter referred to as the WMES). It is understood that at this stage in the development of the Core Strategy the Council require representations on matters of soundness. This letter will use the WMES as its starting point for this determination.

Policy SG14 is of particular relevance for the delivery of the WMES as it sets out the overall economic and employment strategy for the Submission Core Strategy. This policy concentrates economic development on the City Centre, where 50% of jobs are expected to be created from office development. Whilst these targets are ambitious, the City Centre is the logical spatial location for sustainable growth to support the growth agenda for the City. Coventry needs a viable business - oriented city centre to support its aspirations as a growth point. Coventry is also identified in the Regional Funding Advice submission as an Investment Impact Location, as well as being part of the Metropolitan Urban Area and the centre of the North- South corridor running through the Coventry and Warwickshire Sub Region.

Coventry's City Centre will have to expand to perform this sub-regional role and to ensure accessibility to those within the City most in need (within the North of Coventry Regeneration Area).

The office growth will also be balanced with housing and retail growth proposed for the City Centre to meet Regional Spatial Strategy targets. The Agency is committed to helping the City Council and its stakeholder groups help deliver its longer-term aspirations and ambitions. The development of a City Centre Action Plan will also be a key planning document in the delivery of the Core Strategy aims. Both the University of Warwick and Coventry University are acknowledged centres of educational excellence, producing high calibre graduates and business spin-off opportunities that link into the High Technology Corridor and Science City agendas. Both Universities have ambitious growth plans. Against this background the proposed 30% of jobs to be created over the Core Strategy period in conjunction with the Universities and the University Hospital appears both justified and deliverable.

Officer Recommendation Support welcomed

Statutory Consultee

Representor number **REP-1089**

Representor : **Mark Pearce**

Company: **Advantage West Midlands**

Representation number: **2315** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

cont...

The fact that the Submission Core Strategy recognises that locations beyond the City centre are important for the City's employment growth is welcomed. Development at more traditional and peripheral locations such as Browns Lane and Ansty will be important for the City's wider economy over the Core Strategy period.

The identification of strategic employment locations within the Submission Core Strategy is important if its economic growth goals are to be achieved. Coventry has significant housing development proposed within the Submission Core Strategy, and this has to be balanced against the need for the City to provide a substantial and varied employment land portfolio if their Core Strategy is to be 'jobs led'.

The Submission Core Strategy promotes accessibility within the City. The proposals for an expanded bus network will be key to this and linkages into the most deprived communities will be essential to achieve economic growth and prosperity for all. Improving infrastructure, transport and communications to increase accessibility, efficiency and competitiveness are key WMES Place objectives. Coventry's attractiveness as a business location also depends on its strategic motorway and road links. The Agency has committed circa £10 million to help deliver highway safety and capacity improvements on the A46 and at junction 2 of the M6, in conjunction with funding from the Highways Agency. This will facilitate the development of Ansty Park and bring about capacity improvements for the wider network. The Agency is also funding work through the Coventry, Solihull and Warwickshire Partnership to bring about the most innovative solutions to wider infrastructure improvements for Coventry and the wider Sub-region.

Locating jobs and services where they will be easily accessible to new and existing households will be key to the delivery of the Core Strategy, with the challenge being to ensure that high quality of life aspirations are achieved and the goals of achieving sustainable communities and creating a sense of place are realised. These aspirations tie into the Sustainable Communities agenda within the Place objective of the WMES. The Agency considers the promotion of design standards within the Submission Core Strategy (such as clear guidance for green infrastructure) and for policies to proactively plan for waste (including a replacement waste facility at Bar Road) are essential elements of the Core Strategy.

A key WMES Place goal is to regenerate our most deprived communities. Policy SG4, sets out key locations where public and private agencies can work together over the first half of the Core Strategy period to bring about sustainable neighbourhood regeneration. Clearly this policy will form part of a far wider policy framework, but its inclusion within the Submission Core Strategy is welcomed as a means of focusing regeneration activity within the City.

The Agency welcomes the opportunity to continue to be involved in the development of the Core Strategy and trusts that these comments are of use in this key stage in the Local Development Framework process.

Officer Recommendation

Support welcomed.

Statutory Consultee

Representor number **REP-1091**

Representor : **West Midlands Police**

Company: **West Midlands Police**

Agent Details Company: **Tyler Parks Partnership**

Contact: Mr J Sammon

Representation number: **2027** Representation in regard to : **Policy IM 1: Developer Contributions for Infrastructure**

Verbatim Submission

Policy 1M 1: Developer Contributions for Infrastructure

1. We welcome the inclusion in policy IM1 of 'emergency and essential services' in the list of services and facilities where planning obligations may require contributions towards provision. Paragraphs 9.4 and 10.3
2. We believe it is entirely appropriate for the police to be included in the Council's 'checklist' of facilities and services necessary to provide sustainable neighbourhoods and communities to support the proposed expansion and growth of the City (paragraphs 9.4 and 10.3). Paragraph 10.21
3. The Authority welcome the references made in paragraph 10.21 to the potential requirement for a further police presence in the west of the City and the consequent requirement for contributions to be sought from developers through policy IM1 to help ensure the core strategy aim of achieving a sustainable community is achieved.
4. The council's stated intention to continue to consult with the Police Authority to identify specific sites and areas for service expansion is welcomed (paragraph 10.21).

Officer Recommendation

Support welcomed

Statutory Consultee

Representor number **REP-1099**

Representor : **Mrs Tracey Black**

Company: **The Highways Agency**

Representation number: **2235** Representation in regard to : **8.16**

Verbatim Submission

PPS12 advises that in order to be 'sound' a Core Strategy must be justified, effective and consistent with national policy. In order to meet these requirements, the document must be founded on a robust and credible evidence base, be the most appropriate strategy when considered against the reasonable alternatives and be deliverable, flexible and be capable of being monitored. Insofar as infrastructure is concerned, PPS12 states that the Core Strategy should be supported by evidence of what physical infrastructure is needed to enable the amount of development proposed for the area, taking into account its type and distribution. Evidence should also be provided that demonstrates who will provide that infrastructure and when it will be provided. PPS12 goes on to advise that the infrastructure planning process should identify, as far as possible:

- " Infrastructure needs and costs;
- " Phasing of development;
- " Funding sources; and,
- " Responsibilities for delivery

PPS12 does, however, recognise that the budgeting processes of different agencies may mean that less information may be available when the Core Strategy is being prepared than would be ideal. In order to address this, PPS12 states that the Core Strategy must make proper provision for such uncertainty and should not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision.

As articulated through Circular 02/2007, it is Government transport Policy, wherever possible to look for alternatives to building new roads, by reducing the impact of road users on each other and the environment improving road performance through better network management and making smarter journey choices easier. There is no evidence to suggest that this has been done ahead of the proposals identified. The Highways Agency has not been consulted on any of these schemes, they are not committed Highways Agency's schemes and there is no evidence to support the need for them.

The Agency recognises that there are capacity/operational issues at Stoneleigh Road junction and while proposals for improvements to this junction have been developed to accommodate traffic generated by the RASE development at Stoneleigh, the works that may be necessary to accommodate additional development in this location (that will perhaps come forward through Warwick District's LDF) have not yet been assessed, in terms of the need for them, alternatives or design.

For the reasons outlined above the Highways Agency considers that the references to road schemes on the M6 and A46 at paragraph 8.16 should be removed from the Core Strategy.

Statutory Consultee

Representor number **REP-1099**

Representor : **Mrs Tracey Black**

Company: **The Highways Agency**

Officer Recommendation

Minor change.

8.2 - Remove final sentence

8.3 Amend paragraph to read: "Sub-regionally the City sits at the centre of important north-south (Nuneaton-Leamington/Warwick) and east-west (Rugby-Birmingham) movement corridors. The north-south road network is based around the A444 to the north of the City and the A46 to the south whilst the east-west road network is based around the A45. The Highways Agency is promoting improvements to the Toll Bar End junction on the A45/A46, shown on the Proposals Map. The east-west rail corridor has already been improved, including platform lengthening and car park extensions at Tile Hill station but the north-south rail corridor needs significant service improvements. Ensuring that there are efficient public transport links to meet aspirations is an important part of the Core Strategy."

8.9 Amend final sentence to read: "¿ with the A45 west of the Stivichall/Cheylessmore junction so that the long-distance through-route role of this part of the A45 is given less priority.

8.16 Amend paragraph to read: "Some road improvements outside the City boundary may be needed to develop the north-south corridor and aid regeneration. To the north, further improvements to M6 Junction 3 would enhance the north-south link along the A444. To the south, a replacement access to the Westwood Business Park, bypassing the University of Warwick, would both improve access to the Business Park and reduce traffic impacts on the University site."

Representation number: **2236** Representation in regard to : **8.9**

Verbatim Submission

PPS12 advises that in order to be 'sound' a Core Strategy must be justified, effective and consistent with national policy. In order to meet these requirements, the document must be founded on a robust and credible evidence base, be the most appropriate strategy when considered against the reasonable alternatives and be deliverable, flexible and be capable of being monitored. Insofar as infrastructure is concerned, PPS12 states that the Core Strategy should be supported by evidence of what physical infrastructure is needed to enable the amount of development proposed for the area, taking into account its type and distribution. Evidence should also be provided that demonstrates who will provide that infrastructure and when it will be provided. PPS12 goes on to advise that the infrastructure planning process should identify, as far as possible:

- " Infrastructure needs and costs;
- " Phasing of development;
- " Funding sources; and,
- " Responsibilities for delivery

PPS12 does, however, recognise that the budgeting processed of different agencies may mean that less information may be available when the Core Strategy is being prepared than would be ideal. In order to address this, PPS12 states that the Core Strategy must make proper provision for such uncertainty and should not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision.

The Red Route is not part of the LTP, nor is it supported by credible evidence to suggest that it is deliverable or necessary.

The Highways Agency is however particularly concerned about the Core Strategy proposal to reduce the priority of the A45 through key junctions. The Highways Agency has not been consulted on these proposals and there is no evidence to support the need for them. The purpose and function of the SRN is to facilitate the long distance transport of people and goods and one of the key aims of the Agency is to ensure that the free flow of the network is maintained so that this can be done effectively and efficiently with minimal congestion and delay. The Highways Agency is therefore concerned about any ideas that the Council may have about reducing the priority of the A45.

Officer Recommendation

Update.

Statutory Consultee

Representor number **REP-1099**

Representor : **Mrs Tracey Black**

Company: **The Highways Agency**

Representation number: **2237** Representation in regard to : **6.75**

Verbatim Submission

PPS 12 states that in order to be 'sound' a Core Strategy must be justified, effective and consistent with national policy. In order to meet these requirements, the document must be founded on a robust and credible evidence base, be the most appropriate strategy when considered against the reasonable alternatives and be deliverable, flexible and capable of being monitored.

Where a Core Strategy allocates land to meet its development requirements, in order for the core strategy to be sound, these allocations must be deliverable. In this instance, the Agency is concerned that proposed employment site 2 'Land at Willenhall Triangle' may not be deliverable due to access issues.

Circular 02/2007 and PPG13 set out a general presumption that there will be no additional accesses to motorways and other routes of strategic national importance, other than the provision of service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges.

In respect of other routes on the SRN, the Agency adopts a graduated and less restrictive approach, but there will still be a presumption in favour of using existing accesses and junctions.

PPG13 states that this approach should particularly help in the development of urban brownfield sites. Accordingly, where the development of a site may deliver significant local and/or regional benefits it may be appropriate that access from the trunk road is provided. The Highways Agency acknowledges that planning permission has previously been granted for a roadside service area on the site, with access from the A46, however, such a use is directly related to the purpose and function of the SRN, serving the needs of the travelling public thereby providing benefits to the route in terms of its operation and safety.

An alternative use however would not generate such benefits for the SRN and it is the Agency's view that given the current traffic conditions on the A46 and the nature and strategic function of the road in this location, the provision of direct access from the A46 for an employment development of this size is unlikely to be acceptable.

Officer Recommendation

Representation number: **2238** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

The Highways Agency has carried out a modeling exercise of the implications of the proposed eco-suburb on M6 Junction 3. This has suggested that if the eco-suburb is developed in accordance with the principles set out in paragraph 6.40 of the Core Strategy, then traffic impact should not lead to significant capacity issues at M6 Junction 3.

The Highways Agency would expect the transport infrastructure that accompanies the proposals to be deliverable and appropriately phased to support the development of the settlement as it grows. In order to ensure this, the Agency considers that the policy needs to refer back to the principles outlined in paragraph 6.40.

The Highways Agency will assess the traffic implications arising from each phase of the proposed eco-town in accordance with the guidance and approach contained within Circular 02/2007.

Officer Recommendation

Noted

Statutory Consultee

Representor number **REP-1104**

Representor : **John Sidebottom**

Company: **CENTRO**

Representation number: **2066** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

- 1 - Centro should be referred to as the Integrated Transport Authority (ITA)
- 2 - policy context should refer to DfT and Centro documents
- 3 - Centro would like to be involved in negotiations of public transport infrastructure
- 4 - Centro would like to discuss the wording of Policy SG 7 to ensure that it reflects ITA standards (also policies SG 12 and SG 18?)
- 5 - could be reference to "safe and secure" pedestrian routes in Chapter 7
- 6 - Centro should be referenced as a key partner in para 8.8
- 7 - request the addition of the Park and Ride site at Tile Hill station

Officer Recommendation

- Minor change: SG7 substitute "bus stop" for "bus route"
- Minor change: New sentence end of 7.44 "it is important that parks and open spaces should be connected to public transport. Corridors and schemes through development of safe and secure routes"
- Minor change: Para 8.8 to read "... Highways Agency, CENTRO (the Integrated Transport Authority) and service providers"
- Minor change: Add P&R at Tile Hill South on proposals map.

Statutory Consultee

Representor number **REP-1105**

Representor : **Mr Martin Ross**

Company: **The Environment Agency**

Representation number: **2068** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

Regarding your Water Cycle Study, you should ensure that this has been updated in line with your revised housing targets in order to give a better chance of your Core Strategy being made sound.

With reference to Section 6 Policy SG2, the surface water generated by developments can itself cause flooding problems on the site and downstream, increasingly so with climate change. Bearing this in mind, the surface water drainage of any major development must be designed so as to retain rainfall within the development area and discharge it to downstream systems in a controlled fashion. These are the principles of Sustainable Drainage and every major development must use a Sustainable Drainage solution in its surface water system. We are therefore of the opinion that a chance has been lost to incorporate a policy for decreasing surface water run off into the Core Strategy and using SuDS to help to adapt the increased intensity of rainfall due to climate change in the future. This is particularly important in such a heavily urbanised area.

It is disappointing that there are no policies or objectives regarding opening up culverted watercourses or protecting the integrity of the culvert by not developing over or near them, particularly as there are plans to redevelop and regenerate the city centre. The River Sherbourne, the Springfield Brook, the Radford Brook and other watercourses were culverted under the City Centre in the past for the convenience of development.

The Environment Agency has a national Culverting Policy that resists all future culverting of watercourses (except for access purposes) and will seek to reinstate all culverted watercourses as open watercourses where they are affected by, or directly adjacent to, developments. This will improve access for maintenance, reduce the chance of blockage, potentially reduce flood risk and also extend natural river corridors into the city centre for the benefit of the public, biodiversity and the environment in general. Obviously there are instances where this may be found to be impractical, such as very deep culverts requiring a huge land take and prohibitive costs, but such schemes are being carried out for great social and environmental benefits. (See Longbridge for example, where the River Rea is being opened up as part of the redevelopment of this disused industrial area of Birmingham).

The Swanswell Initiative might be an ideal opportunity to explore this option in the near future. Wherever possible, new development should seek to incorporate and celebrate any streams/watercourses within their site. These features should be used as a focal point within any public open space and the developer must leave a reasonable working corridor for future maintenance or repair. You may wish to include this in any City Centre AAP's or similar that you plan to produce.

Overall, your Core Strategy suggests that the policies EM4 and EM5 are to be replaced by SG2 and SG1. However, we feel that they do not fully cover our concerns. Although these points are mentioned within the document, we feel they should have been included as specific policies and there is an opportunity for the council to suggest stronger policies in support of climate change adaptation.

Officer Recommendation

No change.

Statutory Consultee

Representor number **REP-1109**

Representor : **Pam Neal**

Company: **Warwickshire County Council**

Representation number: **2078** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

The County Council is supportive of the Spatial Strategy as set out in Section 5 of the Submission, as it is in line with the Coventry, Solihull and Warwickshire sub-regional framework, recognising that the north south corridor is the focus for development. Further it is acknowledged that in the longer term, some of Coventry's growth would need to be accommodated on Green Belt within and beyond the city's boundaries (within Nuneaton and Bedworth and Warwick), an approach which is supported by the CSW sub-regional partners.

Officer Recommendation

Support welcomed.

Statutory Consultee

Representor number REP-1109

Representor : Pam Neal

Company: Warwickshire County Council

Representation number: 2079 Representation in regard to : 6: Delivering Sustainable Growth

Verbatim Submission

In the section on Waste Management it is acknowledged that the County Council, the City Council and Solihull Metropolitan Council are working in partnership to develop waste management infrastructure across the sub-region to address the treatment gap identified in the RSS. However, the County Council is unclear as to what is meant by the necessity of 'sharing waste facilities across boundaries' in paragraph 6.18. Does this relate to existing sites, or the requirement for new sites?

Further, in paragraph 6.20, it is not clear what is required to deal with the final disposal of materials not suitable for recycling, composting or energy recovery. Will the City Council be making provision for facilities or is it expected there will be a reliance on capacity outside of Coventry?

At the Emerging Spatial Strategy stage, the County Council made comments about Mineral Safeguarding Areas, and we are pleased to see the inclusion of Policy SG5 : Safeguarding Minerals Resources. However, it is considered that the issue of prior extraction still needs to be addressed.

Officer Recommendation

Insert new paragraphs to read:

"6.20a The recovery of waste takes place through recycling, composting, and energy recovery. Re-use mainly involves using re-usable products whereas recycling involves the processing of waste materials to produce a usable raw material or product. Facilities for the collection of materials suitable for recycling such as glass, paper, metals, batteries, textiles, and oil are provided at a variety of locations in the City. A flexible approach will be maintained to accommodate new disposal pressures as they arise, based around maintaining a range of facilities ranging from public waste disposal sites, material recovery facilities and composting, to more local facilities at supermarkets and bus stops. Container banks will need to be located in places which are convenient for the public, either close to their homes and accessible by cycle or on foot, or else by car in a location designed to encourage a journey combined with other purposes.

6.20b Materials recovery facilities sort mixed household waste or mixed recyclable materials and usually require high numbers of deliveries and collections and involve mechanical or hand sorting, preferably in a closed building. They have similar requirements to the criteria for the location of industrial employment sites. The scale of lorry movements resulting may have highways implications.

6.20c Composting is the breakdown of plant matter by the action of micro-organisms into usable end products. The City Council recognises the importance of separating out suitable wastes like green wastes and food wastes, and for providing for their bio-degradation rather than incineration. All of this should help to concentrate composting at source except where large quantities are involved and therefore reduce the need to travel and the need to provide additional composting sites."

Following new paragraph 6.20c, insert new policy SG4A to read:

"Policy SG4A: Provision for Recycling and Composting Facilities for the re-use and recovery of waste materials will be promoted and encouraged provided that they are:

- located so as to be accessible for people by a choice of means of transport;
- designed to a high standard within the context of the local setting; and
- compatible with nearby uses.
- Sites for materials recovery facilities should be located within areas used or allocated for industrial purposes.

Proposals for the composting of suitable waste will be required to meet the following criteria:

- site size of at least 2.5 hectares;
- no composting taking place within 250 metres from the curtilage of a dwelling; and
- compatibility with other Plan policies."

Statutory Consultee

Representor number **REP-1109**

Representor : **Pam Neal**

Company: **Warwickshire County Council**

Representation number: **2080** Representation in regard to : **7: Protecting and Improving Environmental Quality**

Verbatim Submission

The County Council is supportive of the proposal to replace the existing Energy from Waste plant at Whitely.

Officer Recommendation

Support welcomed.

Representation number: **2081** Representation in regard to : **8: Creating an Accessible City**

Verbatim Submission

We have no observations to make in relation to Section 8 - Transport and Accessibility, other than to confirm that the County Council are supportive of the transport measures and proposals that are being put forward.

Officer Recommendation

Support welcomed

Statutory Consultee

Representor number **REP-1110**

Representor : **Mr David Simpson**

Company: **Solihul Council**

Representation number: **2082** Representation in regard to : **6.78**

Verbatim Submission

1. 3.S The draft RSS (Policy PA13B) sets out criteria for dealing with proposals for large-scale out-of-centre office developments. The submission Core Strategy advises that small-scale proposals will be dealt with in accordance with Policy PA13B but, to accord with the draft RSS, it should also say how large-scale proposals will be assessed.

Officer Recommendation

Amend title to read: "Promote the City Centre as a major office, retail and culture and leisure destination." Insert new sentence after first sentence of paragraph to read: "Large scale office development outside the City Centre will only be permitted if it has been demonstrated that there are no sequentially preferable sites available, and that the proposed development would not undermine the vitality or viability of the City Centre and/or Major District Centres." Amend third sentence to read: "Large scale office development is defined as 5,000 square metres gross floorspace." Delete final sentence.

Insert new Policy following paragraph 6.78 to read:

"Policy SG17A: Small Scale Office Developments

Unless directly associated with and ancillary to an employment land use, smaller scale offices should normally be located in or at the edge of defined centres"

Representation number: **2083** Representation in regard to : **6.72**

Verbatim Submission

The draft RSS (Policy PA6) requires metropolitan districts to provide and maintain a minimum five year reservoir of readily available employment land and sets out 'indicative long-term' employment land requirements (employment land is defined as land allocated for business classes BI, B2 and B8). Coventry's, reservoir requirement is 82 ha and the longer-term requirement is 246 ha. The submission Core Strategy is committed to maintaining the reservoir amount but not the entire longer term amount. The draft Core Strategy should clarify how sites will be brought forward to maintain the minimum reservoir in accordance with draft RSS requirements.

Officer Recommendation

Insert new paragraph 6.74A following 6.74 to read: "On 31st March 2008, the supply of employment land with planning permission (including those under construction) in Coventry was 36.26 hectares. In accordance with Footnote d to Draft RSS Policy PA6A - Employment Land Provision - 39.28 hectares at former Peugeot Ryton should also be included within Coventry's 'readily available' land supply because it has planning permission that is currently under construction. The requirements of the 82 hectare 'minimum reservoir' have therefore been met. As these sites are developed out, allocated sites set out in Table 4: Employment and Mixed-Use Allocations can move into the minimum reservoir. The allocated sites may be treated as readily available, but the reserve sites within the Keresley Eco-Suburb are not readily available until such time as planning permission has been granted for their development."

Representation number: **2084** Representation in regard to : **6.36**

Verbatim Submission

Green field sites appear to be proposed for immediate release, including the release of a substantial green field allocation on the east of the city. These sites do not appear to be required to meet the current five year housing land supply requirement. Such sites could be more attractive to developers and residents than sites within the regeneration zone than previously developed land within the city and particularly sites within the regeneration zones, contrary to the submission Core Strategy's aims to focus on regeneration and the recycling of land. Policy SG6 states that the release of land will be phased, but this appears to relate to the release of the safeguarded sites only. No clear mechanism for the release of safeguarded sites is included in the draft Core Strategy. If all safeguarded land is released once Coventry City Council can no longer identify five years housing land supply, investment would be diverted away from the MUA.

Officer Recommendation

Insert new Policy following paragraph 6.78 to read:

"Policy SG17A: Small Scale Office Developments

Unless directly associated with and ancillary to an employment land use, smaller scale offices should normally be located in or at the edge of defined centres"

Statutory Consultee

Representor number **REP-1161**

Representor : **Karen Rose**

Company: **Government Office West Midlands**

Representation number: **2321** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

Our main concern is the way in which the proposed housing and employment development outside of the City Council's boundaries in Warwickshire is to be handled and in particular how the cross border working involved led to the outcome. It is acknowledged that there is considerable difficulty for you in proceeding, not only before WMRSS Phase 2 review is complete but also in advance of the Core Strategies of the neighbouring authorities who are considerably less developed with their Core Strategies than yourselves. This will be a significant problem , however, it seems reasonably likely that you could present sufficient evidence to justify the choices made in the DPD although, some aspects may need re-presenting in order to clarify the approach intended by the Core Strategy at Submission. In particular the document lacks an avenue for a future DPD to allocate the remaining requirements. Therefore you may wish to consider phasing, with the development outside the boundaries to be included in the later phases. You will also need evidence of support from neighbouring authorities. I know this has proved problematic but if you could provide a clear statement of support from the Local Authorities involved, based on the work you have been undertaking within the CSW partnership, this may assist in providing evidence that the issue has been discussed and of the outcome of those discussions.

The document does not highlight or identify areas of flexibility or contingency arrangements in the event of difficulties with the preferred strategy. What plan would you have in place to fall back on if the Preferred Options were not available? Regarding the waste element of the plan it is noted there is a lack of reference, information or policy about the management of waste other than municipal waste in the document. There also appears to be a lack of a criteria based policy for the location of waste management facilities and the scale that may be required. The document should be able to demonstrate how capacity could be provided, identifying the type or types of waste management facility. The policies outlined at SG3 could be strengthened to include a pattern of waste management facilities and waste flow areas.

I hope that you find the comments above and those in the attached appendix to be helpful to you. I would like to take the opportunity for my colleague Mike Price and myself to discuss these, the response from stakeholders and the general public to the publication of the Core Strategy with you at an early opportunity. I would be grateful if you could advise me of a suitable date and time, Mike and I would be willing to come over to Coventry if that is easier.

Statutory Consultee

Representor number REP-1161

Representor : Karen Rose

Company: Government Office West Midlands

Officer Recommendation

Add footnotes at bottom of table to read: " "Strategic Housing Allocations" are those with a capacity of over 100 dwellings" and "SHLAA Sites" are identified in the City Council's Strategic Housing Land Availability Assessment 2009"

Amend Walsgrave Hill Farm number of dwellings to 800

Delete sites 15-22

Amend fourth title to read: "[Safeguarded] Reserved Land"

Add a new column to table, containing indicative phasing

Delete from "15 Mount Pleasant" to "22 Windmill Road Depot" and renumber Ref column accordingly.

Amend number of dwellings at Central City Industrial Estate as follows: [69] 70

Delete Land at Lentons Lane

Add to end of table:

Additional Urban Area Allocations - With Existing Planning Permission

28 - Land west of Banner Lane and south of Broad Lane (remainder of existing planning permission) PDL 495

29 - Former Dunlop Warehouse, Beake Avenue PDL 130

30 -Midland Sports Centre PDL 115

Insert new paragraphs to read:

6.20a The recovery of waste takes place through recycling, composting, and energy recovery. Re-use mainly involves using re-usable products whereas recycling involves the processing of waste materials to produce a usable raw material or product. Facilities for the collection of materials suitable for recycling such as glass, paper, metals, batteries, textiles, and oil are provided at a variety of locations in the City. A flexible approach will be maintained to accommodate new disposal pressures as they arise, based around maintaining a range of facilities ranging from public waste disposal sites, material recovery facilities and composting, to more local facilities at supermarkets and bus stops. Container banks will need to be located in places which are convenient for the public, either close to their homes and accessible by cycle or on foot, or else by car in a location designed to encourage a journey combined with other purposes.

6.20b Materials recovery facilities sort mixed household waste or mixed recyclable materials and usually require high numbers of deliveries and collections and involve mechanical or hand sorting, preferably in a closed building. They have similar requirements to the criteria for the location of industrial employment sites. The scale of lorry movements resulting may have highways implications.

6.20c Composting is the breakdown of plant matter by the action of micro-organisms into usable end products. The City Council recognises the importance of separating out suitable wastes like green wastes and food wastes, and for providing for their bio-degradation rather than incineration. All of this should help to concentrate composting at source except where large quantities are involved and therefore reduce the need to travel and the need to provide additional composting sites."

Following new paragraph 6.20c, insert new policy SG4A to read:

"Policy SG4A: Provision for Recycling and Composting Facilities for the re-use and recovery of waste materials will be promoted and encouraged provided that they are:

- located so as to be accessible for people by a choice of means of transport;
- designed to a high standard within the context of the local setting; and
- compatible with nearby uses.
- Sites for materials recovery facilities should be located within areas used or allocated for industrial purposes.

Proposals for the composting of suitable waste will be required to meet the following criteria:

- site size of at least 2.5 hectares;
- no composting taking place within 250 metres from the curtilage of a dwelling; and
- compatibility with other Plan policies."

Statutory Consultee

Representor number **REP-1161**

Representor : **Karen Rose**

Company: **Government Office West Midlands**

Representation number: **2322** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

We have previously discussed the issue regarding the lack of a locality distinctive vision and objectives based on important local issues. You advised in February that you shared our concern and as a result you made links to the sustainable Community Strategy to strengthen the local distinctiveness of the vision. However, these links lack clarity and should be strengthened to show clear linkages to the policies that follow. The allocation of numerous small sites (as opposed to only strategic locations) in the Core Strategy may cause a potential problem in that the rest of the Core Strategy may not adequately support these. You would need to ensure that adequate evidence to support the site allocations is available. This could be provided by the SHLAA and possibly the Green Belt Study, although the latter does not appear to give clear details on the sites, especially capacity that will enable sites to be developed in the later plan period. Without this clarity the document would need to outline details, including a timeframe, of a proposed Site Allocations DPD.

At paragraph 5.21 it is outlined that the additional population growth likely to be experienced in Coventry will have some implications for the different centres, but what are the implications? Policies may be required in the Core Strategy to address these issues.

Maps & Key Diagram - these could be strengthened by including additional information such as district village place names to give local distinction to the maps as they currently stand they are not very descriptive and difficult to visualise.

It has been noted that there is little included in the document regarding the current economic climate, a mention is made in paragraph 3.21, however this is surprising considering that the Coventry Solihull and Warwickshire partnership are leading on the economic recovery taskforce. We would have expected more to have been made on the strong local partnership and the broad recognition of a driver for economic opportunities in the region making linkages and opportunities of the major urban area of Birmingham.

As previously mentioned in my letter of 19th December 2008, the current system places an emphasis on delivery for emerging plans, this is usually evidenced by an implementation framework. This framework is vital in setting out how the Core

Strategy will be delivered, by whom and show that the plan is sufficiently flexible regarding economic circumstances. I note that you have included an Implementation and Monitoring Framework. However, this could be strengthened by the inclusion of the expected timeframe.

Officer Recommendation

Minor change: new sentence at the end of paragraph 5.25 "The current economy situation presents a challenge to the delivery of the Core Strategy".

Statutory Consultee

Representor number REP-1163

Representor : Andy Donnelly

Company: West Midlands Regional Assembly

Representation number: 2336 Representation in regard to : Core Strategy Proposed Document

Verbatim Submission

The Coventry Core Strategy 'Proposed Submission' was published in March 2009; the formal closing date for comments is 1st May. This reflects the revised processes in the preparation of Development Plan Documents as provided for in the new 2008 Planning Policy Statement (PPS) 12 and associated regulations whereby Local Authorities now 'publish' their submission in draft in order that any issues raised can be considered prior to the formal submission stage. It is at this juncture that the Regional Assembly is required to provide an opinion of General Conformity in relation to the Regional Spatial Strategy (RSS).

The extant RSS for the West Midlands was published in January 2008 and incorporates changes to the original RSS of 2004 as a result of the Phase 1 Revision in respect of the Black Country. As part of the phased revision to the original RSS of 2004 the Regional Assembly has submitted to the Secretary of State their Phase Two Revision Preferred Option document. In this assessment this will be referred to as the 'RSS Preferred Option' on the basis that this is what the document is called throughout the Coventry Core Strategy Proposed Submission. In developing the RSS Preferred Option, Coventry, Solihull and Warwickshire prepared a subregional framework to accommodate the higher levels of growth that need to be accommodated within it. This recommended that growth be redirected to Coventry, which would expand primarily along a north - south public transport axis. This would enable a focussed rather than dispersed pattern of development and would assist Coventry in realising the critical mass to become a sub-regional service centre through the expansion of its City Centre and to exploit the opportunities offered by the expansion of the University of Warwick. In the longer term, some of Coventry's growth would need to be accommodated on Green Belt within and beyond the City's boundaries (within Nuneaton and

Bedworth and Warwick Districts). It is understood that this approach is supported by all sub-regional partners and that LDFs being prepared in adjoining authorities will reflect this sub regional framework.

Relevant Planning History

The City Council has previously consulted on the following documents leading up to the publication of this document:

- Issues and Options May 2006
- Reissued Issues and Options July 2007
- Emerging Core Strategy November 2008

Informal comments have previously been provided to the City Council by the Regional Assembly on these documents.

The description of the Development Plan Document or Regionally Significant Planning application should be a clear concise accurate and precise account. Consider in Development Plan Documents for example the status of the document; its relationship to previous plans any related planning history considered under the new planning system or is it in transitional stages was there a first deposit draft). Consider in the case of Regionally Significant Planning applications for example, the type, scale, size and nature of the proposed development and its planning history.

Regional Spatial Strategy Objectives (Para 3.14 a-j)

(a) to make the MUAs of the West Midlands increasingly attractive as places where people want to live work and invest Coventry is a compact and separate MUA and has been designated by Government as a New Growth Point. The extant 2008 RSS cites Coventry as 'a forward looking city which along with

Solihull and Warwickshire, can help create an important growth engine for the Region'.

This is built upon in the RSS Preferred Option whereby a bespoke framework for the Coventry, Solihull and Warwickshire Sub-Region is introduced to direct a higher proportion of growth to within the City's boundaries and to sustainable urban extensions immediately adjacent to it along a north - south public transport axis.

Officer Recommendation No change

Statutory Consultee

Representor number REP-1163

Representor : Andy Donnelly

Company: West Midlands Regional Assembly

Representation number: 2337 Representation in regard to : Core Strategy Proposed Document

Verbatim Submission

...cont

This will enable Coventry to retain population and create the critical mass to expand the City Centre. Coventry's City Centre 'offer' is not at present befitting of a city with its population and catchment.

Clearly this approach is consistent with making the MUAs an increasingly attractive place to live, work and invest.

(b) to secure the regeneration of the rural areas of the Region

Not directly applicable.

(c) to create a joined up multi centred Regional structure where all areas/centres have distinct roles to play Growth of Coventry City Centre is advocated in accordance with the RSS Phase Two Preferred Option.

(d) to retain the Green Belt but to allow an adjustment of boundaries where this is necessary to support urban renaissance

The extant 2008 RSS policy CF3: Levels and Distribution of Housing Development clause C specifies that 'Locations which extend the boundaries of the MUA will not be acceptable as they would run counter to the approach taken throughout the Spatial Strategy and the policies set out within this document'.

The Proposed Submission Core Strategy does propose amendments to Green Belt boundaries and safeguards sites for development in the longer terms should they be required. This is to ensure that brownfield opportunities are exploited first and urban renaissance principles maintained. It is understood that the Green Belt sites that have been safeguarded have been identified in accordance with guidelines set out in PPG2 Green Belts. This, is consistent with the RSS Preferred Option as discussed in response to (a) above and it is considered appropriate that Coventry plans in accordance with the RSS Preferred Option given that is at an advanced stage and also in order to demonstrate the requisite 'flexibility' to accommodate changing circumstances as is sought by PPS12 (para 4.46).

(e) to support the cities and towns of the Region to meet their local and sub regional development needs

The strategy seeks to meet sub-regional needs in a more sustainable manner than previous policies of dispersal.

The proposals in the Proposed Submission Core Strategy will assist Coventry in fulfilling its potential as a sub-regional centre, for example, by providing the critical mass of development for the City Centre to expand to meet the needs of its population and catchment.

(f) to support the diversification and the modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion

Although significant housing growth is advocated through the Proposed Submission Core Strategy, it is employment led in order that the City can diversify following the loss of jobs in manufacturing over the last few decades.

Strong policies are included to protect high quality employment land and significant growth opportunities are identified through the growth of the City Centre / University of Warwick.

(g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region

The Core Strategy includes policies on green infrastructure, urban open space, biodiversity and urban design which reflect RSS QE policies.

(h) to improve significantly the Region's transport system

The Core Strategy includes proposals to significantly improve Coventry's public transport system along the north / south growth axis. (i) to promote the development of a network of strategic centres across the Region Growth of Coventry City Centre is advocated in accordance with the RSS Preferred Option.

Officer Recommendation

No change

Statutory Consultee

Representor number **REP-1163**

Representor : **Andy Donnelly**

Company: **West Midlands Regional Assembly**

Representation number: **2338** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

(j) to promote Birmingham as a world city

It is considered that the proposals will complement Birmingham as part of a wider regional 'offer'.

RSS Spatial Strategy Policies: Topic Chapters

Urban renaissance (Policy checklist: UR1 UR2 UR3 UR4)

Extant RSS Policy UR1: Implementing the Urban Renaissance promotes centres as the focus for regeneration, encourages the reuse of land and premises, improved accessibility and focussing on areas of need. These matters are covered through the Proposed Submission Core Strategy. Any Green Belt releases are proposed towards the end of the plan period. Extant RSS Policy UR3: Enhancing the Role of City, Town and District Centres identifies a role for lower level centres also; again this is reflected in the Proposed Submission Core Strategy. Rural renaissance (Policy checklist: RR1 RR2 RR3 RR4) Not directly applicable.

Communities for the Future (Policy checklist: CF1 CF2 CF3 CF4 CF5 CF6)

Housing policies are set out in the 'Delivering Sustainable Growth' policies.

The RSS Preferred Option (CF 3) states that Coventry's requirement is 33,500 net additional dwellings up to 2026. It acknowledges, however, that some of these will need to be accommodated beyond the City's boundaries dependent upon the outcome of further studies. Further studies have indicated that 26,510 dwellings can be accommodated in the City; 22,760 within the existing built up area and 3, 750 requiring Green Belt release. This leaves a balance of 6,990 to be accommodated in adjoining authorities of Warwick and Nuneaton and Bedworth along the north south axis. Policies SG6 and SGBof the Core Strategy makes it explicitly clear that in the first part of the plan period residential development will be focused on previously developed land within the built up area with safeguarded Green Belt land only being released once monitoring suggests that the 5

year supply that is required through PPS3 cannot be provided. This is consistent with RSS Revision Policies CF4: Phasing of New Development and CF5: The re-use of land and buildings for housing. Policy SG6 also identifies the need to improve and renovate existing stock with table two estimating that 2,160 empty dwellings will be brought back into use. This is specifically encouraged by para. 6.29 of the RSS Preferred Option and is consistent with the overarching RSS policy CF1: Housing within the Major Urban Areas (both extant and RSS Preferred Option). Policy SG10 Housing Needs and Mix also specifies a target requirement of 25% affordable housing units in Coventry, this is consistent with the level sought for the Central Housing Market Area as specified in RSS policy CF7: Delivering Affordable Housing in the RSS Preferred Option. Policy SG10 also specifies requirements for executive housing, it is understood that this is to improve Coventry's 'offer' to those who may otherwise be inclined to settle in adjoining Warwickshire. This is clearly consistent with urban renaissance principles which seek to make the MUAs more attractive places to live and also coincides with RSS Revision policy CF8: Delivering Mixed Communities.

Prosperity for All (Policy checklist: PA1 PA2 PA3 PA4 PA5 PA6 PA7 PAS PA9 PA10 PA11 PA12 PA13 PA14 PA15)

Employment Land

The Proposed Submission's employment policies are framed against the backdrop of RSS policies PA2 and PA3, Urban Regeneration Zones and High Technology Corridors. The Coventry and Nuneaton RZ covers much of the north and east of the City with the HTC embracing the two universities within the City. There are no regionally significant employment sites in Coventry although the Ansty Regional Investment Site is to the north east of the City in adjoining Rugby District.

Officer Recommendation

Statutory Consultee

Representor number **REP-1163**

Representor : **Andy Donnelly**

Company: **West Midlands Regional Assembly**

Representation number: **2339** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

Policies PA6 (Portfolio of Employment Land) and PA6A (Employment Land Provision) of the RSS Preferred Option specify that a minimum five year reservoir (82 ha) of employment land is identified through the Proposed Submission Core Strategy with an indicative longer term requirement of 246 ha. Employment sites should be categorised as sub-regional, good quality and other.

The Core Strategy identifies 113 ha of employment and mixed use allocations, a minimum of 75 ha will be developed for B1, B2 and B8 uses; this is broadly in line with the requirement set out in the RSS Preferred Option. It would, however, be useful if these sites were categorised in accordance with RSS policy PA6a definitions in order to enable regionally consistent monitoring.

This is supported by the Prosperity for All Policy Lead.

The Core Strategy does not make longer term allocations but acknowledges that monitoring will lead to the need for additional sites to be identified. These may be within the Green Belt and / or adjoining Districts; such an approach is supported by the RSS Preferred Option. The Core Strategy also suggests that land at nearby Ryton in Rugby District (former Peugeot site), will meet some of Coventry's requirements. This is supported by the Prosperity for All Policy Lead.

There is strong policy protection of best quality employment land in the Core Strategy Proposed Submission (Policy SG16) and this accords with RSS policy PA6b: Protection of Employment Land and Premises within the RSS Preferred Option.

Centres

The Core Strategy refers to the RSS Preferred Option gross comparison retail figures (95,000 sqm between 2006 and 2021 and 55,000 sqm gross between 2021 and 2026) and augments these with locally derived figures which include further development at the Cannon Park and Brandon Road centres. As a consequence these city wide figures are higher than those in the RSS Preferred Option which only identifies strategic centre requirements.

Ten distinct quarters are identified in the City Centre to accommodate this growth and sites to accommodate longer term growth (between 2021 - 2026) are identified within the Precinct Quarter and it is suggested, subject to criteria, that these may be brought forward earlier. The RSS Preferred Option (Policy PA 12A) states that these longer term requirements should not be granted consent before 2016.

The 250,000 sqm gross additional office floorspace figure referred to in the Proposed Submission Core Strategy (para 6.84) and large scale offices are directed to the City Centre (para 6.78); proposals for smaller developments will be determined in accordance with RSS Preferred Option policy 13B: Large Scale Office Developments outside the Strategic Centres.

The Centres Policy Lead supports growth and expansion of the City Centre and the identification of quarters within it and states that the Proposed Submission appears to be in line with the RSS Preferred Option Policy PA12A. However, the supporting text or policies SG19 and SG20 do not provide a clear statement of the level of city centre comparison retail growth proposed to 2021 or of any indicative requirement beyond that date, and it would be helpful if this could be clarified. Similar para 6.84 also reflects and seems to endorse the office floor space figures identified in policy PA13A; again it would be useful if there were a clear statement that this is the figure that will be planned for in the City Centre.

Para 6.78 states that proposals for smaller scale office development will be considered in accordance with RSS Preferred Option policy PA13B. This is somewhat confusing as Policy PA13B is concerned with large scale office developments outside of the strategic centres. For clarity, it would be useful if this paragraph made it clear that policy PA13B applies to all office developments beyond the strategic centres.

Statutory Consultee

Representor number **REP-1163**

Representor : **Andy Donnelly**

Company: **West Midlands Regional Assembly**

Officer Recommendation

Minor change. Table 4 -

Following the Sub-Total relating to Mixed-Use Allocations, insert to read:

"Reserve Sites

13. Keresley Eco-suburb	Sub-Regional	11.0	11.0"
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Amend Grand Total figures to read 124.04 and 84.50

Insert new column before "Area (Hectares)" to be entitled "RELS Classification*" and insert "Good Quality" in this column for all sites except for site 7 (Jaguar Brown's Lane) for which "Sub-Regional" should be inserted. Insert at the foot of the table: "**Good Quality sites are those between 0.4 and 10.0 hectares. Sub-Regional sites are those of more than 10.0 hectares. The classification relates to the B1/B2/B8 element of the total sites area."

Minor change. Insert new Policy following paragraph 6.78 to read:

"Policy SG17A: Small Scale Office Developments

Unless directly associated with and ancillary to an employment land use, smaller scale offices should normally be located in or at the edge of defined centres"

Statutory Consultee

Representor number **REP-1163**

Representor : **Andy Donnelly**

Company: **West Midlands Regional Assembly**

Representation number: **2340** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

Quality of the Environment (Policy Checklist: QE1, QE2, QE3, QE4, QE5, QE6, QE7, QE8, QE9, EN1, EN2, M1, M2, M3, M4, WD1, WD2)

The Core Strategy includes policies on green infrastructure, urban open space, biodiversity and urban design which reflect RSS QE policies.

It also includes sustainability policies promoting sustainable building techniques, renewable energy and climate change mitigation measures in accordance with the SR policies introduced through the RSS Preferred Option. It will also be linked with job opportunities particularly at the nearby Prologis park.

The largest proposed incursion into the Green Belt will accommodate the Keresley Eco Suburb, which will be an exemplar development based on the principles set out in the draft Eco Towns PPS. It will be accompanied by a new country park and will have regard to the Design Guidelines for Development in Coventry's Ancient Arden. In terms of Waste policies, the Warwickshire Regional Conformity Advisor has commented that under the extant RSS Waste Policies (WD1 & WD2) it may be worth referring to the proposal to build a new waste management facility at Bar Road, which would be a sub-regional facility for Coventry, Solihull and Warwickshire, to address the capacity gap. It is, however, understood that Policy SG4 expressly allocates this site. Transport & Accessibility (Policy checklist: T1 T2 T3 T4 T5 T6 T7 T8 T9 T10 T11 T12) Policy AC1: Transport prioritises developing public transport along the north south axis to support the growth strategy; particular proposals include rail improvements between Coventry / Nuneaton and Coventry / Leamington and a £77 million north south express bus service.

The Implementation and Monitoring Framework does not appear to mention the improvements to the A45/A46 Toll Bar End which it is understood is an already committed Highways Agency scheme although it is included on the Proposals Map..

Consider how the proposal relates to the key RSS objectives (refer to Chapter 3 para. 3.14 of the RSS) which provide the context for the RSS policies. Ensure that the case is considered against the RSS Objectives and are referred to in this section. Consider the case against all the RSS topic chapters: Urban renaissance; Rural renaissance; Communities for all; Prosperity for all; Quality of the Environment; Transport & Accessibility. The relevant policies to the case should be referred to in this section and how they will be considered in the overall assessment.

Comments Received

Comments have been received from the Prosperity for All and Centres Policy Leads and also from the Regional Conformity Advisor for Warwickshire. These are incorporated above.

All Comments received for example from the RSS Policy Leads; The RA's Strategic Advisors and the Other Stakeholder Groups and the Business Council to be recorded in this section.

Emerging RSS Policy (RSS Phase 2 Revision Preferred Options Policy checklist: SR1, SR2 and SR3, CF1 to CF10, PA1, PA4, PA6, PA6A, PA6B, PA7, PA8, PA9, PA11, PA12B, PA13, PA13A, PA13B, W1 to W12, T6, T7, T8, T9, T10, T1 and T12)

Incorporated into the text on individual Topic Chapters above.

In the context of a OPO or SPO is the plan sufficiently flexible to any relevant emerging RSS Policies. In respect of planning applications consider whether any emerging RSS Policies are relevant material considerations that should be taken into account by the LPA.

The Assessment/Evaluation

(i)Key relevant issues

As the Core Strategy has been prepared in tandem with the RSS Preferred Option, this assessment has been undertaken largely on this basis and as such considers proposals for sustainable urban extensions to Coventry.

Officer Recommendation

Statutory Consultee

Representor number REP-1163

Representor : Andy Donnelly

Company: West Midlands Regional Assembly

Representation number: 2341 Representation in regard to : Core Strategy Proposed Document

Verbatim Submission

...cont

This approach has been developed at the sub-regional level and commands support from the relevant authorities. It is considered that such an approach is more sustainable than a pattern of sub-regional trend based dispersal of development and it will also enable Coventry to develop critical mass and fulfil its role as a sub-regional centre.

Whilst the extant 2008 RSS does not permit extensions of MUA boundaries to accommodate additional housing development, such amendments are encouraged through the RSS Preferred Option in the longer term for Coventry and its hinterland as this is recognised to be the most sustainable means of meeting sub-regional growth requirements. This approach is supported by Sub-Regional partners and WMRA. It is, therefore, entirely appropriate that Coventry plans on this basis as it demonstrates the requisite flexibility as sought by PPS 12. Indeed, if Coventry were not to take account of the RSS Preferred Option it would potentially run the risk of being deemed unsound on the basis of showing insufficient flexibility.

(ii) Relevant RSS Objectives

- to make the MUAs of the West Midlands increasingly attractive as places where people want to live work and invest
- to create a joined up multi centred Regional structure where all areas/centres have distinct roles to play
- to retain the Green Belt but to allow an adjustment of boundaries where this is necessary to support urban renaissance
- to support the cities and towns of the Region to meet their local and sub regional development needs
- to support the diversification and the modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion
- to ensure the quality of the environment is conserved and enhanced across all parts of the Region

- to improve significantly the Region's transport system

(iii) Comments Received

Comments received have been incorporated through the main body of this assessment.

(iv) Emerging RSS Policy (Phase 2 Revision)

See (i) above

(v) Summary and Assessment

The Coventry Core Strategy Proposed Submission has been prepared in tandem with the RSS Preferred Option and this assessment has been undertaken largely on that basis. Whilst the extant 2008 RSS does not encourage extension of the MUA boundaries, which coincide with the built up area of Coventry, it is considered appropriate that Coventry plans in accordance with this the RSS Preferred Option for the reasons set out throughout this assessment. Indeed, a failure to do so runs the risk that the strategy may not be suitably flexible in terms of changing circumstances and as such would run the risk of being deemed 'unsound' on these grounds.

The Core Strategy sits within a sub-regional framework endorsed by the Coventry, Solihull and Warwickshire Forum of local authorities. This framework seeks to direct growth to within and adjoining Coventry rather than dispersing growth to smaller settlements. This approach is consistent with urban renaissance principles in that it will enable Coventry to retain population, create critical mass thus enabling Coventry to fulfil its potential as a sub-regional centre for employment, shopping, leisure and education. Proposed longer term urban extensions are along a north / south public transport axis thus improving accessibility. Green Belt releases will be focussed towards the end of the plan period when brownfield opportunities have been fully exploited. This approach is enshrined in the RSS Preferred Option.

The RSS Preferred Option allocates 33,500 dwellings to Coventry, the Proposed Submission Core Strategy identifies capacity for 26,510 dwellings within the City's administrative boundaries, implying that the balance will need to be met in adjoining Warwick and Nuneaton and Bedworth Districts. Again this accords with the RSS Preferred Option.

Officer Recommendation

Statutory Consultee

Representor number **REP-1163**

Representor : **Andy Donnelly**

Company: **West Midlands Regional Assembly**

Representation number: **2343** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

More specifically, the Core Strategy reflects the affordable housing requirements for the Central Housing Market Area set out in the RSS Preferred Option and also seeks to improve the range and mix of market housing to retain people who previously may have chosen to move out of the City. Employment land allocations are broadly consistent with the approach set out in the RSS Preferred Option although it would be beneficial especially for regional monitoring purposes if they could be categorised in accordance with the guidance in policy PA6 of the extant RSS .

Similarly, the requisite amount of retail development appears to be identified in accordance with the requirements of the RSS Preferred Option requirements but further clarity as suggested above would be beneficial.

Major public transport investment is focussed along a north / south axis to support the growth strategy.

An overall assessment and evaluation should (i) highlight the key relevant issues of the development plan document or regionally significant planning application with the RSS; (ii) relate them against the relevant RSS objectives and the RSS policies; (iii) consider all the comments received from for example the Policy Leads etc. (iv) summarise all the issues and comments received and weigh up the critical factors in reaching a 'balanced view' of the circumstances and (v) provide a clear logical 'step by step' assessment of the particular case.

Conclusion and Opinion of General Conformity

Although the extant RSS does not countenance amendments to the MUA boundaries to accommodate housing growth, there is explicit support for Coventry to review its MUA boundaries in the RSS Preferred Option which is currently being subjected to Examination in Public. This approach commands support of all sub-regional partners and WMRA as it is considered to be the most sustainable means of accommodating additional sub-regional development requirements and is considered to be in accordance with underlying urban renaissance principles.

PPS 12 requires that DPDs demonstrate the requisite 'flexibility' to deal with potentially changing circumstances; in the light of this requirement Coventry's approach is clearly vindicated and a failure to proceed on this basis would potentially delay adoption of the Core Strategy and potentially lead to the Core Strategy being deemed unsound on 'flexibility' grounds.

There are also safeguards in that the Green Belt incursions to extend the MUA comprise 'safeguarded' rather than allocated sites and that they will not be brought forward until brownfield capacity has been exploited and monitoring indicates a requirement.

On balance, therefore, the Proposed Submission Core Strategy takes a pragmatic line and provides the relevant flexibility to accommodate RSS Preferred Option requirements (as required by PPS12) and is therefore considered to be in General Conformity with the RSS for the West Midlands.

With regard to the more detailed matters on retail and employment policies agreed with Policy Leads, it is for the City Council to consider whether they wish to address these largely presentational points prior to formally submitting the Core Strategy to Public Examination.

The opinion of general conformity should be based on the overall assessment and sound judgement and provide a clear and unambiguous opinion of whether the case is in general conformity with the RSS. In respect of Development Plan Documents or Supplementary Planning Documents this should be considered against the definition of general conformity i.e. whether an inconsistency or omission would significantly harm the implementation of the RSS.

With regionally significant planning applications (as defined by the RPBs criteria) the opinion should consider whether the proposed development would prejudice the policies and objectives of the WMRSS i.e. as the 'general conformity' test.

Officer Recommendation

Other Organisations

Representor number **REP-1031**

Representor : **Coventry University**

Company: **Coventry University**

Agent Details Company: **Turnberry Consulting Ltd**

Contact: Miss Suzanne White

Representation number: **1833** Representation in regard to : **HOW THE CORE STRATEGY DELIVERS THE THEMES OF THE SUSTAINABLE COMMUNITY STRATEGY**

Verbatim Submission

One of the objectives of the Sustainable Community Strategy is the realisation of 'a creative, active and vibrant Coventry', creating a Coventry where people want to visit, live, work, learn and do business. The core strategy objectives aim to deliver these goals. However, the text set out in Table 1 of section 4 does not state how all of these objectives will be met and the important role that the University can play in delivering on these issues, and is therefore considered to be unsound as it will not be effective.

Officer Recommendation

Minor change. Add new bullet point to Theme 1 to read: "To build on the contribution of the two universities"

Representation number: **1835** Representation in regard to : **Policy Area SG 13: Student Housing**

Verbatim Submission

The University objects to the statement in paragraph 6.62 that there is now sufficient supply of student accommodation. The issue of supply of student accommodation is a matter that must be kept under constant review and with close liaison between the City Council and the University.

Officer Recommendation

Minor change. Add to end of second sentence: "however this will be monitored and reviewed where necessary."

Representation number: **1836** Representation in regard to : **Policy SG 20: City Centre Quarters**

Verbatim Submission

The supporting text to this policy identifies a need to extend the City Centre boundary to take account of development pressures. Ten distinct areas of the city centre have been identified, some of which reflect masterplans and frameworks which have been developed for particular areas. The Whitefriars area is identified as being dominated by Coventry University, and an area for future expansion of the campus. Similarly, Parkside is identified for further University expansion, particularly in research and development.

The policy and supporting text on the city areas do not refer to the University Masterplan. As the key document guiding development of the campus, it is considered that for the policy to be fully justified and effective, reference should be made to the Masterplan.

Officer Recommendation

No change.

Representation number: **1837** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

Recognition of Coventry University as a major employer in the City is welcomed and it is noted that 30% of new jobs in the city are expected to be provided by the two Universities and the University Hospital. Also, the protection of Parkside as a strategic site is welcomed. However, the deliverability of the policy is questioned. Although the policy identifies the University as a key source of employment growth, it is not translated into support for education-related development. As such, the policy is deemed unsound as it cannot be effective without providing the development required to support the growth expectations.

Officer Recommendation

Minor change amend Parkside strategic employment site boundary

Representation number: **1838** Representation in regard to : **Policy IM 1: Developer Contributions for Infrastructure**

Verbatim Submission

The text of the policy identifies a need for developers to fund community infrastructure where demand arises from a proposed development. Coventry University provides higher education services for the residents of the City and independently provides services such as healthcare and leisure facilities for staff and students. For these reasons it is considered that to require contributions from the University towards community infrastructure would be unjustified.

Officer Recommendation

No change

Other Organisations

Representor number **REP-1031**

Representor : **Coventry University**

Company: **Coventry University**

Agent Details Company: **Turnberry Consulting Ltd**

Contact: Miss Suzanne White

Representation number: **1839** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

The policy requires all development to be carbon neutral in terms of eliminating predicted carbon emissions and relates to all redevelopment schemes, including refurbishment of existing building stock. Achieving carbon neutrality in new development, and especially in refurbishment schemes, will add significantly to the cost of development and could jeopardise viability. On this basis the policy requirement is considered unnecessarily onerous and not justified.

Officer Recommendation No change.

Other Organisations

Representor number **REP-1107**

Representor : **Uni of Warwick**

Agent Details Company: **Turley Associates**

Contact: Michael Best

Representation number: **2075** Representation in regard to : **8: Creating an Accessible City**

Verbatim Submission

The University of Warwick broadly welcomes the Strategic Vision and Objectives set out in the draft Core Strategy and wishes to express support for various elements of the Core Strategy Submission Draft. However, the University questions the effectiveness of some parts of the document (Paras.4.4 and 4.5, Draft Policies SG13and SG14,and the Strategic Employment allocation for the University of Warwick Science Park) in the context of PPS12: Local Spatial Planning. Pleaseseen the accompanying letter for further information.

Officer Recommendation

Support welcomed.

Representation number: **2076** Representation in regard to : **9: Achieving sustainable Communities and a Better Sense of Place**

Verbatim Submission

The University of Warwick broadly welcomes the Strategic Vision and Objectives set out in the draft Core Strategy and wishes to express support for various elements of the Core Strategy Submission Draft. However, the University questions the effectiveness of some parts of the document (Paras.4.4 and 4.5, Draft Policies SG13and SG14,and the Strategic Employment allocation for the University of Warwick Science Park) in the context of PPS12: Local Spatial Planning. Pleaseseen the accompanying letter for further information.

Officer Recommendation

Support welcomed.

*Add RSS2 definition of employment land to glossary.

Representor number **REP-1148**

Representor : **Mr Keith Waller**

Company: **University Hospitals Coventry and Warwickshire**

Representation number: **2224** Representation in regard to : **7.26**

Verbatim Submission

The principle of adjustments to the Green Belt boundary to accommodate essential development is supported. In order to render Policy EQ 2 sound it is considered that hospitals should be treated in the same way as schools (see paras 7.26 and 7.31).

Officer Recommendation

No change

Representation number: **2225** Representation in regard to : **7.31**

Verbatim Submission

The principle of adjustments to the Green Belt boundary to accommodate essential development is supported. In order to render Policy EQ 2 sound it is considered that hospitals should be treated in the same way as schools (see paras 7.26 and 7.31).

Officer Recommendation

No change.

Representation number: **2226** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

The principle of adjustments to the Green Belt boundary to accommodate essential development is supported. In order to render Policy EO 2 sound it is considered that hospitals should be treated in the same way asschools (see paras 7.26 and 7.31).

Officer Recommendation

No change.

Other Organisations

Representor number **REP-1033**

Representor : **Mr Richard Wheat**

Company: **Warwickshire Wildlife Trust**

Representation number: **1842** Representation in regard to : **Policy EQ 3 - Green Infrastructure**

Verbatim Submission

Warwickshire Wildlife Trust welcomes the establishment of a Policy to highlight the importance of green infrastructure and the significant multifunctional benefits it can provide within the built and rural environment. The strategy is informed by a comprehensive Green Infrastructure study that encompasses the majority of potential infrastructure features and identifies areas for its further enhancement and creation in future development plans. The Trust is therefore satisfied that the Strategy has recognized how a well-connected framework of green spaces is integral to providing a more sustainable development plan and has made sufficient provisions for its subsequent protection and enhancement in Policy EQ.3

Officer Recommendation Support welcomed

Representation number: **1843** Representation in regard to : **Policy EQ 1 - Ensuring High Quality Design**

Verbatim Submission

Planning Policy Statement 9 (PPS9) asserts that developments should take into consideration, the role biodiversity plays, in supporting a high quality environment. To do this, plan policies on the form and location of a development must not only take account of conserving and enhancing biodiversity but also to restore it wherever possible. With the production of the associated Green Infrastructure study, information from the Habitat Biodiversity Audit (HBA), and with recognized Local (Warwickshire, Coventry and Solihull) Biodiversity Action Plan (LBAP) targets, there is sufficient information to inform, where and how, restoration of biodiversity can be integrated into new development proposals. Policy EQ.1 should therefore reflect this and enable opportunities to deliver the restoration of biodiversity through new development proposals, in addition to its conservation and enhancement, to support the production of a high quality environment.

Officer Recommendation Agree minor change. "conserve, restore and/or enhance" penultimate bullet.

Representation number: **1844** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission

1) The strategy refers to all locally designated sites as Local Wildlife Sites (LWS). Whilst this term is technically correct by the time this strategy is in use, Warwickshire Wildlife Trust would like to express concern over the use of alternative terms to describe these sites in the Green Infrastructure Study (G.I study). Site of Importance for Nature Conservation (SINC) is the term defined for locally designated sites in appendix 3 of the G.I study, however no reference to SINC's has been made in policy EQ.5 or the appendix 2 definitions of the Strategy. Clarification of this terminology is essential to ensure the compatibility of the G.I study with the proposed Strategy. 2) Whilst the strategy acknowledges the importance of landscape and archaeological features in the wider landscape there does not appear to be the strong emphasis on the protection of ancient woodlands, veteran trees and trees with Tree Preservation Orders (T.P.O). Furthermore, Planning Policy Statement 9 (PPS9) recognizes the irreplaceable value of these features and under the Countryside Rights of Way Act 2000 (CroW Act) asserts that plan policies should aim to protect and enhance these resources. However, policy EQ.5 makes no reference to the aforementioned features and therefore fails to accommodate how they can be enhanced. 3) Policy EQ.5 provides an unambitious approach to how the strategy can contribute to the aims and objectives of the Local (Warwickshire, Coventry and Solihull) Biodiversity Action Plan (LBAP). Whilst the Trust are in agreement that LBAP species and habitats should afford protection under the policy, it should also incorporate how development offers opportunities to create and restore LBAP habitats and create features and areas for LBAP species.

Officer Recommendation

1 - agree to make minor change. insert "including SINC's to 1st para after "geological sites"
2 - agree to make minor changes. Insert in final para after "assets", "trees protected by preservation orders, ancient woodland, historic environmental assets". "damage and in the case of archeological remains all practical...". Also final bullet EQ1 "quality incl existing hedges and trees of value".

3 - No change. Policy does make clear that proposals will be sought to enhance and create habitats.

ADD SINC INTO GLOSSARY

Other Organisations

Representor number **REP-1040**

Representor : **Mr Mark Sullivan**

Company: **CPRE Warwickshire branch**

Representation number: **1854** Representation in regard to : **3: Policy Context**

Verbatim Submission

Section 3 gives a one-sided presentation of the Sub-Regional Planning Policy (section 3.11 et seq). It sets out in the table high housing figures for Coventry, claiming that these are set by the RSS without explaining that they result from the City Council's own advocacy of major housing growth. The demand projections show that actual household growth in Coventry will be much lower. The basic aim of the policy to deliver a very large number of new dwellings is not sound.

Officer Recommendation

Minor change. Insert new paragraph 3.12b to read: "The RSS recognises that, given the proximity of these areas of significant economic potential so close to the Major Urban Area of Coventry, there is a real opportunity to focus development and realise the growth potential of the sub-region both within the City and also within the wider North-South Corridor. Development will be planned and controlled to ensure that it:

a) maintains the WMRSS 'step change' in the Coventry, Solihull and Warwickshire area i.e. minimum 50% growth to Coventry and Solihull;

b) focuses growth on the North-South Corridor and Rugby; with the necessary supporting infrastructure; but that growth in North Warwickshire and Stratford-on-Avon be limited to local needs;

c) phases housing land releases to encourage regeneration in the MUA's by giving priority to:
- sustainable locations first and foremost and, within those locations brownfield land before Greenfield land

- then, if necessary, urban extensions within Local Authority areas

- only as a last resort, cross-boundary urban extensions in the North-South Corridor (later in the plan period), if no more suitable alternative capacity is available

d) enables specific local Greenbelt boundary adjustment for sustainable urban extensions to be made through LDF's when and where essential to meet long term needs

e) proposes releases of land for housing geared to maintain a constant average annual supply across the sub-region."

Representation number: **1856** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

Para 5.12 describes the Sub-Regional Planning Policy. It sets out in the table high housing figures for Coventry, claiming that these are set by the RSS without explaining that they result from the City Council's own advocacy of major housing growth. The demand projections show that actual household growth in Coventry will be much lower. The basic aim of the policy to deliver a very large number of new dwellings is not sound. The Policy is also unsound because the City Council has advocated inclusion in the RSS Preferred Option of a figure of 33,500 dwellings (2006-2026) and now admits in the Core Strategy that the total figure cannot be accommodated within the City boundary. 7,000 dwellings are instead proposed to be located in Warwick or Nuneaton & Bedworth Borough areas (para 5.13). Such as re-allocation could only be done by a Joint Core Strategy incorporating those two local planning authorities' areas. That has not been done; this is an additional reason why the Policy is unsound.

Officer Recommendation

No change.

Representation number: **1857** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

Policy SG6 proposes to promote housing development on allocated sites and safeguarded land. While the policy is to use previously-developed land and sites within the built-up area first, it is not clear that policy will be sufficiently clear or firm to prevent 'cherry-picking' by developers who will find greenfield sites easier to develop and more profitable. The mechanism to prevent developers undermining the aim of the Policy is not clear from the document.

Officer Recommendation

No change.

Other Organisations

Representor number **REP-1040**

Representor : **Mr Mark Sullivan**

Company: **CPRE Warwickshire branch**

Representation number: **1858** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

(a) The Core Strategy allocates in Table 3 housing locations that should not be proposed. The locations no 32 Cromwell Lane (Burton Green) and 36 Duggins Lane are Green Belt and exceptional circumstances have not been shown (under the PPG2 test) for altering the Green Belt boundary and developing them.
(b) The Keresley eco-suburb, location no 31, is not a soundly based housing proposal; exceptional circumstances have not been shown (under the PPG2 test) for altering the Green Belt boundary to allow it on greenfield land. See representation on Policy SG9.
(c) The housing proposal no 24, Jaguar Browns Lane, is not soundly based. The whole Browns Lane site should be used for housing (at medium or low density) and the employment use reduced greatly.

Officer Recommendation No change.

Representation number: **1859** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

The proposed 'eco-suburb' is in an unsustainable location, with poor access and no prospect of high-quality public transport. Exceptional circumstances have not been shown to justify altering the Green Belt boundary to allow development of the eco-suburb. There is no realistic prospect of 3,750 dwellings being built at Keresley in the period to 2026, the area having a record of low demand and building only with public-sector funding (eg Prologis Park which benefited from extensive grants). So it is not an effective part of the Core Strategy.

Officer Recommendation No change.

Representation number: **1860** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

Para 6.69 supporting Policy SG14 states that 75,000 new jobs will need to be provided between 2006 and 2026 to serve Coventry, and that this will require 226 ha (662 acres) of land. A 'minimum reservoir' of 82 ha (203 acres) of 'readily-available' land is supposed to be required by the RSS.
This level of new employment is not realistic. Such a level of new job creation has never been achieved in Coventry in modern times. The City will be competing with other locations for (private sector) jobs and has in the past proved unable to attract businesses, when Northampton and Milton Keynes in the same M1-M6 motorway corridor offer superior conditions and a more attractive environment.
The overall employment policy SG14 is thus not sound.

Officer Recommendation No change.

Representation number: **1861** Representation in regard to : **Policy SG 15 : Provision of Employment Land and Premises**

Verbatim Submission

The 'minimum supply of new employment land' of 82 ha is excessive. It would lead to much land being allocated without being developed, and a loss of Green Belt. Para 6.69 supporting Policy SG14 states that 75,000 new jobs will need to be provided between 2006 and 2026 to serve Coventry. Such a level of job creation has never been achieved in Coventry in modern times and the City is competing with other major urban areas which can offer better conditions for incoming employers.
The Jaguar Browns Lane site (location no 7 on Map 4, no 27 on Map 5) should be reduced greatly as an employment location because of its poor location relative to public transport and major road links. It would be better used for low and medium density housing for up to 300 dwellings (rather than just 150 dwellings on part of the site only, which is the proposal in Table 3 (location 24) under Policy SG7.

Officer Recommendation No change.

Other Organisations

Representor number **REP-1040**

Representor : **Mr Mark Sullivan**

Company: **CPRE Warwickshire branch**

Representation number: **1862** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

The proposal to reduce the area of Green Belt and to introduce the concept of 'safeguarded land' is not sound. It undermines the PPG2 Policy which requires exceptional circumstances to be demonstrated to alter Green Belt boundaries in any Forward Planning process. The removal of Green Belt status from the Cromwell Lane (Burton Green) and Duggins Lane (Tile Hill) is not justified. The Duggins Lane location was proposed in the Coventry UDP in 2001 but the proposal was deleted by the Inspector in the UDP Inquiry. Para 7.33 is not sound as it does not make clear that it means additions to Green Belt (amending the Green Belt boundary). The proposal to allow amendments to the Green Belt for re-building or extension of schools is not justified. Para 7.31 sets out a complicated process, which appears to allow removal of parts of school campuses to allow school rebuilding or extension. This would undermine confidence in the role of the Green Belt and is not necessary. Very special circumstances can be argued for school buildings where the school site is washed-over Green Belt.

Officer Recommendation No change.

Representation number: **1863** Representation in regard to : **Policy AC 1 : Transport**

Verbatim Submission

(1) The Policy does not consider the future of the Coundon Wedge Road. The Jaguar Browns Lane location should cease to be a significant employment location and the land used instead for housing (300 dwellings - see Representation on Policy SG15 and Table 4). The Wedge Road was justified and approved in 1987 as needed to allow Jaguar to expand production to 100,000 cars per year. This was never achieved. Instead car production at Browns Lane has ceased. The justification for the Coundon Wedge Road, which is very harmful to the landscape and the character of Allesley and the Wedge, should be removed. The failure to propose this makes the Core Strategy unsound.

(2) The policy proposes a new railway station at the Ricoh Area (on the Coventry Nuneaton line) but has no provision for High-Speed Rail to serve Coventry. Government policy (2009) is to examine a new High-Speed line, HS2, between London and the West Midlands. In order that such a service or route serves Coventry the Core Strategy should include a policy to provide for study of this, including widening and upgrading the main line through the city as one option. This would include significant changes at and around Coventry Railway Station.

Officer Recommendation No change.

Other Organisations

Representor number **REP-1054**

Representor : **Mr Robert Jays**

Company: **William Davis Ltd**

Representation number: **1916** Representation in regard to : **5.12**

Verbatim Submission

William Davis Ltd do not consider the approach adopted (and discussed at paragraphs 5.12 and 5.13 of the Core Strategy) to represent the most appropriate strategy when considered against reasonable alternatives and should therefore be considered unsound as it is not in our opinion justified. We consider that additional Green Belt allocations around Coventry can be made within the Core Strategy to help accommodate the housing numbers for the City. A number of sustainable development locations in the city's Greenbelt are still available that have not been allocated in the Strategy and that could make significant contributions to meeting housing requirements in the city.

One such sustainable Greenbelt site is located to the north of Duggins Lane at Tile Hill as identified on the attached plan. This site was identified by William Davis in reps upon the Core Strategy 'Options' document in September 2007 and the 'Emerging Core Strategy' in December 2008. The land is in a highly sustainable location in close proximity to key services and also in close proximity to excellent public transport links including Tile Hill train station. The Tile Hill area of the city is already recognised as a sustainable location in the Core Strategy with another site on Duggins Lane and land directly to the south on Cromwell Lane having already been proposed as safeguarded housing land under policy SG 7. The land North of Duggins lane is identified in the Joint Greenbelt Review as 1 of 26 'least constrained' sections of Greenbelt around the city which should be considered for future development.

William Davis also note that paragraph 5.12 should be considered unsound as it is not based on a robust and credible evidence base and therefore should not be considered justified. The SHLAA on which paragraph 5.12 and policy SG 7 is based did not consider the land north of Duggins Lane and consequently does not represent a complete consideration of all available housing land in the city. We therefore do not consider the SHLAA to represent a credible and robust evidence base on which to base Green Belt housing allocations in the strategy.

Officer Recommendation

No change. It was rejected because the westernmost of the two fields is visually part of the open countryside and its development would be an unnatural extension into the Meriden Gap. It is also constrained by overhead power lines.

Representation number: **1917** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

William Davis Ltd are of the opinion that a further site should be added to the safeguarded land identified in Policy EQ2 and therefore removed from the Green Belt. As acknowledged in our objection to paragraphs 5.12 and 5.13 of the Core Strategy we consider Land to the North of Duggins Lane to be a highly sustainable development option which we have promoted in earlier stages of the LDF. The site was recognised as having little constraint and warranting future consideration for development in the Joint Green Belt Review (Jan 2009). We have completed a Sustainability Matrix for the site to help illustrate its sustainable nature and have attached the matrix to this representation. We consider that with the site not being allocated as Safeguarded Land the policy is not justified and therefore sound as it does not represent the most appropriate strategy when considered against reasonable alternatives.

Officer Recommendation

Minor change. Amend EQ2, second bullet to read "SOUTH of Duggins Lane"

Other Organisations

Representor number **REP-1054**

Representor : **Mr Robert Jays**

Company: **William Davis Ltd**

Representation number: **1921** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

William Davis Ltd do not consider the approach adopted regarding the provision of new housing in Policy SG7 to represent the most appropriate strategy when considered against reasonable alternatives and should therefore be considered unsound as it is not in our opinion justified. We consider that additional Green Belt allocations around Coventry can be made within the Core Strategy to help accommodate the housing numbers for the City. A number of sustainable development locations in the city's Greenbelt are still available that have not been allocated in the Strategy and that could make significant contributions to meeting housing requirements in the city.

One such sustainable Greenbelt site is located to the north of Duggins Lane at Tile Hill as identified on the attached plan. This site was identified by William Davis in reps upon the Core Strategy 'Options' document in September 2007 and the 'Emerging Core Strategy' in December 2008. The land is in a highly sustainable location in close proximity to key services and also in close proximity to excellent public transport links including Tile Hill train station. The Tile Hill area of the city is already recognised as a sustainable location in the Core Strategy with another site on Duggins Lane and land directly to the south on Cromwell Lane having already been proposed as safeguarded housing land under policy SG 7. The land North of Duggins lane is identified in the Joint Greenbelt Review as 1 of 26 'least constrained' sections of Greenbelt around the city which should be considered for future development. William Davis have completed a Sustainability Matrix for the land North of Duggins Lane to help illustrate the highly sustainable nature of the site , we have attached the matrix to this representation as further supporting evidence.

William Davis also note that Policy SG7 should be considered unsound as it is not based on a robust and credible evidence base and therefore should not be considered justified. The SHLAA on which Policy SG 7 is based did not consider the land north of Duggins Lane and consequently does not represent a complete consideration of all available housing land in the city. We therefore do not consider the SHLAA to represent a credible and robust evidence base on which to base new housing provision allocations in the strategy.

Officer Recommendation No change.

Representor number **REP-1056**

Representor : **Derbyshire Gypsy Liasion**

Company: **Derbyshire Gypsy Liasion Group**

Agent Details Company: **Ernest Bailey Community Centre**

Contact: A.R. Yarwood

Representation number: **1925** Representation in regard to : **Policy SG 11: Gypsy and Traveller Accommodation**

Verbatim Submission

Thank you for your letter of 19 March 2009, addressed to Alice De La Rue. I have recently been appointed to provide planning advice to the Derbyshire Gypsy Liasion Group following the resignation of Alice De La Rue. Our comments on the above consultation document are set out below;

As we have previously stated, it is government policy that the issue of Gypsy and Traveller site provision should be addressed as a matter of urgency, and we consider that a strong and proactive approach is vital to ensuring adequate site provision. Increased numbers of authorised sites will help to address the health inequalities and social cohesion of the Gypsy and Traveller communities.

We welcome the fact that Paragraph 6.55 acknowledges that the core strategy should set out criteria for the location of Gypsy and Traveller sited, which will be used to guide the allocation of sites. These criteria are shown in Policy SG 11. However Policy SG 11 states that "Proposals for Gypsy and Traveller caravan sited will be assessed against the following criteria". This implies that Policy SG 11 is designed to give guidance in dealing with planning applications, rather than to guide the allocation of sites in the LDF. The role of the criteria needs to be clarified.

Officer Recommendation Minor change: SG11 (d) delete "mains"

Other Organisations

Representor number **REP-1073**

Representor : **Mr John Verdult**

Company: **Friends of the Earth**

Representation number: **1974** Representation in regard to : **2.8**

Verbatim Submission

2.8 - This section talks of the need to expand the built up area in the city in order to satisfy the requirements of the RSS Phase 2 revision draft. The Strategy doesn't state how this can be achieved while adhering to the principle of 'sustainability'.

Officer Recommendation No change

Representation number: **1975** Representation in regard to : **3.19**

Verbatim Submission

3.19 - The Emerging Strategy (2008) presents an employment led approach to development but this is at variance with the Regional Spatial Strategy which advocates expansion led exclusively by house-building.

Officer Recommendation No change.

Representation number: **1976** Representation in regard to : **5.12**

Verbatim Submission

5.12 - States that 10,700 housing units will have to be built on Greenfield sites. This directly contravenes government policy, which is to safeguard Green Belt. The Prime Minister stated in July 2007 that the Green Belt would be robustly protected in the face of housing proposals.

Officer Recommendation No change.

Other Organisations

Representor number **REP-1073**

Representor : **Mr John Verdult**

Company: **Friends of the Earth**

Representation number: **1977** Representation in regard to : **6: Delivering Sustainable Growth**

Verbatim Submission

Paragraph 6.4 states that an objective of the Council is to reduce dependence on fossil fuel supplies. However if a new 'Energy from Waste' facility goes ahead this would still be reliant on waste with a high calorific content such as plastics which are generally produced from fossil fuel-based sources. If anaerobic digestion were to be used for the organic content of the waste stream, energy can be produced without burning fossil-fuel derived products.

Proposed Policy SG2:

We strongly support this policy.

Paragraphs 4 and 5 encourage or expect the use of community heat and power systems. We suggest that the use of superinsulation could be an alternative, as it is always better to reduce the need for energy use rather than solely concentrating on how it is produced:

6.14 - 6.20 and proposed policy SG4- Waste Management:

We strongly object to the proposals for constructing a new Energy from Waste facility on green belt land adjacent to the existing facility. We do not agree that very special circumstances exist to warrant the allocation.

If the proposals go ahead, during the construction, commissioning and handover period of the new facility, which is likely to last several years, the Green Belt in this location would cease to exist completely.

We disagree that the search to analyse alternative sites has been 'extensive' and believe that if a new facility is needed there are more appropriate sites for it. Only 40% of the waste input proposed for the new facility is from Coventry itself.

A suitable use for the heat and power from any Energy from Waste facility has not yet been identified.

There is an implicit assumption in the proposals that Energy from Waste is the only feasible method of waste treatment and an assumption that the replacement of the current plant will go ahead. We believe that the Council should give more consideration to alternative methods of waste minimisation and treatment.

We suggest that Policy SG6, paragraph 5, line 5 should read '...in predominantly residential areas, conversion of small non-residential properties to residential use will be supported.'

The current wording suggests that permission will be given for conversion of all non residential properties, which we believe is not the intention.

6.73 - There is a suggestion here that the council would be prepared to allocate greenfield sites for employment developments, with no detail as to the criteria used to make such decisions and the mechanisms in place to protect green belt.

Officer Recommendation

Minor change. Insert new sentences at end of paragraph to read: " In line with the Memorandum of Understanding signed by Coventry, Solihull and Warwickshire Councils in December 2007, the City Council acknowledges that it will have to provide land for the future development of waste infrastructure to serve the wider sub-region, including but not limited to: energy recovery, recycling and waste transfer. The City Council is keen, wherever possible, to support and promote sub-regional waste management facilities that will bring economies of scale to all end-users. It is also keen to promote the use of local facilities for the treatment of waste materials. Policy SG4 expressly reserves the site at Bar Road. New landfill is not expected in the city."

Amend third bullet point of policy to read: "[p] Proposed new or expanded facilities will consider the Best Practicable Environmental Option (BPEO) for each waste stream. The BPEO is the option that provides the most benefits for the least environmental damage at acceptable cost. [be assessed against the following c] Criteria will also include:

- accessibility to the source of waste arisings;
- the type and volume of waste;
- the extent to which the re?use and recycling of any waste is facilitated;
- the use of raw materials;
- the pollution potential of unavoidable waste;
- the proposals for disposal of unavoidable waste in an environmentally acceptable manner; and
- the implementation of transport connections including the use of rail and water where possible, and lorry routes"

Other Organisations

Representor number **REP-1073**

Representor : **Mr John Verdult**

Company: **Friends of the Earth**

Representation number: **1978** Representation in regard to : **7: Protecting and Improving Environmental Quality**

Verbatim Submission

Policy EQ1 (p74) -We support this policy but suggest that the following wording is added:
Provide ways of accessing the development by sustainable means of transport.

7.19 - The Green Belt is seriously threatened by the Regional Spatial Strategy proposals which would endanger the rural gap between Coventry/Nuneaton and Bedworth and Coventry/Keniworth.

7.26 - 7.28 and relevant part of policy EQ2-

We object to the proposals for changes to the Green Belt to accommodate a new 'Energy from Waste' facility. We disagree that 'very special circumstances' exist to justify this. If the proposals go ahead, we request that at least the area of the existing waste facility is transferred to the Green Belt in part compensation. This has been proposed by the Council in detailed discussions about the site. The proposals map should show this.

7.33 and relevant part of policy EQ2 - additional Green Belt proposals We support this policy.

7.37, 7.48 and relevant part of policies EQ3 and EQ4 - Allotments -

Evidence suggests that the demand for allotments is rising rapidly and there are currently waiting lists at several sites. We request that the council allocates land for additional allotment sites.

7.58 - Biodiversity - The Service Level Agreement with Warwickshire's Ecology Unit is laudable but the service would be much better provided by a council-employed dedicated Ecology Officer, as is the case in the overwhelming majority of local authorities.

Officer Recommendation

Minor change. Add new sentences at end to read: "However there is some indication that waiting lists are increasing and allotments are becoming more popular. However there is some indication that waiting lists are increasing and allotments are becoming more popular. Based on the quantitative standard for allotments there are deficiencies in the North West and South Neighbourhood Areas. This needs to be considered with caution as from the audit a number of sites have vacant plots, that need to be brought back into use before new sites are established." Delete from "Based on the quantitative standard," from text box in table.

Representation number: **1979** Representation in regard to : **8: Creating an Accessible City**

Verbatim Submission

This section lacks more detail on how the council proposes to encourage greater use of cycling and walking e.g. cycle lanes and parking facilities, safe pedestrian crossings etc.

Section 10: Implementation and Monitoring Framework

Policy SG2 (Sustainability) - the 10% target seems very modest.

Officer Recommendation

No change

Other Organisations

Representor number **REP-1080**

Representor : **JS Bloor**

Company: **JS Bloor (Tamworth) Ltd**

Agent Details Company: **JS Bloor (Services) Ltd**

Contact: Mr Max Whitehead

Representation number: **2005** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

1. Policy SG7 and Table 3 allocates a number of urban sites and safeguards six sites currently in the Green Belt for residential and mixed use development. The Council's recognition that the exceptional circumstances¹ exist to warrant the review of the current Green Belt boundaries is welcomed.
2. Consequentially we also support the principle of allocating strategic sites and identifying land to be removed from the Green Belt and safeguarded for future development in the Core Strategy.
3. However we have serious concerns as to the nature of the Council's approach to this exercise.
4. Firstly we would also question the allocation of a number of sites identified in the Core Strategy. It is considered that the allocation of a large proportion of the sites should be deferred to a 'Site Allocations' type DPD or Area Action Plans given their non-strategic nature.
5. PPS12 provides clear guidance as to the identification of strategic sites in Core Strategies at paragraphs 4.6 and 4.7. In particular, it states that the adoption of Core Strategies should not be held up by the inclusion of non-strategic sites. Whilst no guidance is provided as to what a 'strategic' site is, we do not consider that an allocation of 20 dwellings² can be considered "central to the achievement of the strategy" (PPS12 paragraph 4.6).
6. Moreover, it is not apparent from the submission document how the sites proposed for allocation and safeguarding have been selected, what alternative sites were assessed, and Why the alternative sites have been discounted. It is therefore difficult to have confidence that the Core Strategy, by proposing the allocation of certain sites, is justified in accordance with paragraph 4.36 of PPS12.
7. In terms of the six sites proposed by the Council for removal from the Green Belt, it would appear that the Council have restricted their search to the 'least constrained parcels' of Green Belt land identified in the Coventry Joint Green Belt Study (SSR Planning, January 2009).
8. We are of the view that this approach fails the tests of soundness for the reasons set out below.
9. According to the Council's figures the shortfall between the capacity of available urban land (22, 760) and the emerging housing requirement (33, 500) is 10, 740 dwellings. Given the extent of the shortfall and the anticipated availability of Green Belt land in Coventry it is surprising that only capacity for 3750 dwellings has been identified, with 7000 to be found in Nuneaton and Bedworth and Warwick Districts.
The actual level of available Green Belt land is not known because the Council's SHLAA also restricts itself geographically in line with the 'least constrained parcels' identified in the Joint Green Belt Study - the Core Strategy inspector will need to draw his or her own conclusions as to the adequacy of this approach.

Officer Recommendation No change.

Other Organisations

Representor number **REP-1084**

Representor : **JS Bloor**

Agent Details Company: **JS Bloor**

Company: **JS Bloor (Tamworth) LTD**

Contact: Mr Max Whitehead

Representation number: **2017** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

10. As a consequence there is a significant reliance on sites beyond the administrative boundary of Coventry. There does not appear to be any provision or commitment in the Core Strategy (or in other local development documents scheduled in the Council's local development scheme) for joint working with Nuneaton and Bedworth and Warwick Districts in order to facilitate the delivery of these 7000 dwellings.

11. In order to ensure that as far as is possible the Council have greater control over the delivery of its housing requirement we would have expected the Council to seek to maximise the provision of housing within its own administrative boundary.

12. In doing so the Council would need to have undertaken a more sophisticated assessment of the Green Belt boundaries and all of the available land within the administrative boundary of Coventry rather than limiting the search to the 'least constrained parcels' identified in the Joint Green Belt Study.

13. PPG2 sets out national policy with regard to Green Belts and offers guidance to local authorities who are reviewing Green Belt boundaries. As indicated above the exceptional circumstances required by PPG2 to necessitate Green Belt review are in place. PPG2 goes on to state at paragraph 2.8 that revised Green Belt boundaries:

"should be carefully drawn so as not to include land which is unnecessary to keep permanently open"

Effectively what is required in these circumstances is a detailed review of Green Belt boundaries to assess whether all of the land currently in the Green Belt is required to remain so. This does not appear to have occurred.

14. The parcels of land set out in the Joint Green Belt Study are of significant scale. This results in constraints being associated with particular sites within the broad parcels, which in reality do not effect them. This somewhat broad-brush approach has unjustifiably excluded certain smaller sites from consideration. Such sites can make a valuable contribution to the pool of land available to the Council to meet its housing requirements.

15. For example, the Chestnut Nurseries site off Brown's Lane, Allesley (SHLAA reference 303) is located adjacent to the urban edge and is approximately 2.77ha.

This site is located within parcel C17D which is over 13, 000ha in size. Parcel C17D was taken forward for 'further detailed study' in the Joint Green Belt Study (along with other parcels which "do not contribute as significantly" as other parcels to the Green Belt) although it was not identified as a 'least constrained parcel' largely due it being of high landscape value.

16. However the Chestnut Nurseries site cannot be considered of high landscape value given that it is largely covered in structures and hard standing, is physically well contained by strong boundary features. The site is well suited to residential development being small scale, previously developed and in a sustainable location. It is not necessary to keep this land permanently open in a Green Belt context because it is not open in the first place.

Officer Recommendation

Add new sentences at end to read: "There is no clear definition of strategic sites, however we rely on a number of relatively small sites that together are strategic in the context of the Core Strategy. Brief descriptions of the sites are included in Appendix 3."

Other Organisations

Representor number **REP-1084**

Representor : **JS Bloor**

Agent Details Company: **JS Bloor**

Company: **JS Bloor (Tamworth) LTD**

Contact: Mr Max Whitehead

Representation number: **2309** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

17. The overlooking of this site and potentially other such suitable sites by the Council is unjustified and raises serious questions as to the robustness of Policy SG7 and Table 3.

18. Another reason for our concern with the broad-brush approach the Council has taken to identifying potential housing land currently in the Green Belt is the over-reliance on large scale urban allocations and the proposed 'eco-suburb' at Keresley, which may prove difficult and slow to deliver. If the Council had completed a more detailed review of the Green Belt boundaries it is likely that a number of smaller, easily deliverable sites would have been identified which the Council could have fallen back on should delivery elsewhere fall short (including the Chestnut Nurseries site).

19. In conclusion we are of the view that Policy SG7 and Table 3 (and by association the Core Strategy) are not justified as a result of the failure to undertake a thorough assessment of land available for residential development.

To remedy this situation the Council should either:

- Amend Policy SG7 and Table 3 to allocate only genuinely 'strategic' sites (we would suggest those capable of delivering 1000+ dwellings), deferring the identification of non-strategic sites to a 'Site Allocations' type OPO;
 - Include a new parent policy within the Core Strategy providing for a detailed review of Green Belt boundaries;
 - Carry out a detailed review of Green Belt boundaries;
 - Schedule a 'Site Allocations' type OPO in their LOS to define the revised Green Belt boundaries and to allocate the non-strategic sites currently in Table 3 and those sites emerging from the detailed Green Belt review.
- or;
- Withdraw the current Core Strategy;
 - Carry out a detailed review of Green Belt boundaries;
 - Define the revised Green Belt boundaries and identify genuinely 'strategic' sites within a revised submission version of the Core Strategy
 - Allocate non-strategic sites via Area Action Plans specific to particular areas of the City.

Officer Recommendation No change

Representor number **REP-1097**

Representor : **Mr Nigel Wain**

Company: **Coventry Partnership**

Representation number: **2058** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

The Coventry Partnership has been involved with and consulted on at all stages of the development of the Core Strategy. The Core Strategy supports the delivery of the Coventry Partnership Sustainable Community Strategy and Local Area Agreement

Officer Recommendation Support Welcomed

Other Organisations

Representor number **REP-1102**

Representor : **Mr Steven Watkins**

Company: **Swift Property Consultants**

Representation number: **2063** Representation in regard to : **TABLE 2: COMPONENTS OF HOUSING SUPPLY 2006 TO 2026**

Verbatim Submission It is not considering the opportunity to allocate all undeveloped urban land with a white land notation prior
~to considering Green Belt releases.

Officer Recommendation No change.

Representation number: **2064** Representation in regard to : **5.12**

Verbatim Submission The additional 10,700 dwellings should first be considered on undeveloped urban land with a white land allocation of which several sites are available and shown in the proposals map. Green Belt release should only occur after all white land opportunities have been exhausted.

Officer Recommendation No change.

Representation number: **2065** Representation in regard to : **3.5**

Verbatim Submission (Dept. for Communities and Local Govt. expressed concern asto the numbers of additional households in the region as set out in the RSS. The likely increase to between 417,100-445,600 is welcomed providing Coventry is allocated a reasonable proportion of the additional housing numbers, particularly as it is a New Growth Point and is well placed to accommodate additional growth over and above the current proposed allocation.

Officer Recommendation no change.

Other Organisations

Representor number **REP-1107**

Representor : **Uni of Warwick**

Agent Details Company: **Turley Associates**

Contact: Michael Best

Representation number: **2071** Representation in regard to : **4.4**

Verbatim Submission

The University of Warwick broadly welcomes the Strategic Vision and Objectives set out in the draft Core Strategy and wishes to express support for various elements of the Core Strategy Submission Draft.

However, the University questions the effectiveness of some parts of the document (Paras.4.4 and 4.5, Draft Policies SG13and SG14,and the Strategic Employment allocation for the University of Warwick Science Park) in the context of PPS12: Local Spatial Planning. Please see the accompanying letter for further information.

Officer Recommendation

Minor change. Insert additional bullet point to objectibes under theme 1. To build on the contribution of the two universties.

Representation number: **2072** Representation in regard to : **4.5**

Verbatim Submission

The University of Warwick broadly welcomes the Strategic Vision and Objectives set out in the draft Core Strategy and wishes to express support for various elements of the Core Strategy Submission Draft.

However, the University questions the effectiveness of some parts of the document (Paras.4.4 and 4.5, Draft Policies SG13and SG14,and the Strategic Employment allocation for the University of Warwick Science

Park) in the context of PPS12: Local Spatial Planning. Please see the accompanying letter for further information.

Officer Recommendation

Minor change. Insert new paragraph 3.12a to read: "Advantage West Midlands has identified three geographical areas in the region where the mix of business activity, academic expertise, research capability, infrastructure and development opportunities exist to encourage the growth of high technology businesses. These represent key delivery vehicles for the West Midlands Economic Strategy. One of these areas is the Coventry, Solihull and Warwickshire High Technology Corridor, which includes both Coventry University and the University of Warwick."

Representation number: **2073** Representation in regard to : **Policy Area SG 13: Student Housing**

Verbatim Submission

The University of Warwick broadly welcomes the Strategic Vision and Objectives set out in the draft Core Strategy and wishes to express support for various elements of the Core Strategy Submission Draft.

However, the University questions the effectiveness of some parts of the document (Paras.4.4 and 4.5, Draft Policies SG13and SG14,and the Strategic Employment allocation for the University of Warwick Science Park) in the context of PPS12: Local Spatial Planning. Pleaseseen the accompanying letter for further information.

Officer Recommendation

Minor change: amend policy SG13 to read "purpose build student accomodation will be encouraged particularly on campus and in areas..."

Representation number: **2074** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

The University of Warwick broadly welcomes the Strategic Vision and Objectives set out in the draft Core Strategy and wishes to express support for various elements of the Core Strategy Submission Draft.

However, the University questions the effectiveness of some parts of the document (Paras.4.4 and 4.5, Draft Policies SG13and SG14,and the Strategic Employment allocation for the University of Warwick Science

Park) in the context of PPS12: Local Spatial Planning. Pleaseseen the accompanying letter for further information.

Officer Recommendation

Minor change. Amend site boundary to be corrected on proposals map, which does not show boundary of university campus.

Representor number **REP-1160**Representor : **Acetate**Company: **Acetate Products Limited**Agent Details Company: **CB Richard Ellis**

Contact: Laurie Lane

Representation number: **2316** Representation in regard to : **Policy SG 7: Provision of New Housing****Verbatim Submission**

5.1 Section 20(5) (b) of the 2004 Act requires the Inspector to determine whether or not the plan is 'sound'. The starting point for any examination is the assumption that the Local Authority has submitted what it considers to be a 'sound plan'. To be found 'sound' a Core Strategy should be:

5.2 Justified. This means it must be:

- Founded on a robust and credible evidence base. The Council has worked with a number of external consultants and statutory consultees to help produce policies, which are both appropriate and relevant to the City and people of Coventry. This evidence base covers a wide variety of issues including: flooding, biodiversity and student housing.

- The most appropriate strategy when considered against the reasonable alternatives. Prior to this version of the Core Strategy the Council have consulted on 3 prior documents aimed at considering appropriate and realistic options for developing Coventry in the future. Alongside the SA process and relevant evidence documents this version of the Core Strategy has been deemed the most appropriate having been considered against various other options earlier in the process.

5.3 Effective. This means it should be:

- Deliverable. The Core Strategy should show how the vision, objectives and strategy for the area will be delivered. It also ensures that the Strategy can deliver housing, employment and infrastructure at the points it envisages and therefore provide a viable platform from which to grow and expand the City.

- Flexible. The Core strategy should look over a long time frame, usually 15 years, but should be suitable to deal with changing circumstances such as economic fluctuations and changing national and regional planning requirements.

- Able to be monitored. This is essential for an effective strategy and allows the document to be checked and maintained on a regular basis. The Annual

Monitoring Report (AMR) will provide the mechanism by which the strategy will be monitored. This will then highlight to the public and civic leaders any apparent failings or problems with the strategy and any possible requirements to combat these failings.

5.4 Consistent with national policy. Under the 2004 Act Section 20(5) (a) an

Inspector is charged with checking that the Core Strategy has complied with legislation. This includes checking that the plan has regard to national planning policy. 5.5 The Core Strategy submitted by the City Council is expected to conform to policy guidance within these national documents. PPS12 does allow for inconformity with these documents: however it must be based on special and locally specific evidence, which fully justifies a departure from national guidance.

5.6 Also under Section 20 (5)(a), the Core Strategy is required to have regard to other relevant legislation including the Local Development Scheme, the Sustainable Community Strategy, Regional Planning Guidance and the Statement of Community Involvement. The Core Strategy must also have been subject to Sustainability Appraisal. Allocation of the 'Acordis' Mixed Use Site

5.7 It is considered that the principle of allocating the 'Acordis' site for mixed-use development to comprise employment uses and some residential development is sound. The reason for this is it consistent with national policy, embodied in PPG4, which asserts that plan policies should not seek unreasonably to restrict commercial and industrial activities of an appropriate scale - particularly in existing buildings - which would not adversely affect residential amenity. 5.8; however, the following policies that support this allocation which underpin this allocation are deemed unsound:

- SG15 'Provision of Employment Land and Premises';
- SG17 'Mixed Use Redevelopment on Employment Land';
- SG7 'Provision of New Housing';

Officer Recommendation

No change

Representor number **REP-1160**

Representor : **Acetate**

Company: **Acetate Products Limited**

Agent Details Company: **CB Richard Ellis**

Contact: Laurie Lane

Representation number: **2317** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

5.9 The main reason why the policies are considered unsound is that they are not considered to be justified. The reason for this is that the proposed mix of employment and residential development was not consulted on at earlier stages of the Core Strategy development. It would appear that the mix of 80% employment and 20% residential use has been calculated in order to meet the requirements of Policy SG15 (i.e. the maintenance of the 'minimum reservoir' of employment land) and the principles defined in Policy SG17 regarding mixed use redevelopment on employment land. Since reasonable alternatives to the appropriate mix of uses was not consulted on previously, the Proposed Core Strategy Policies regarding Mixed Use Sites can not be regarded as the most appropriate. 5.10 Further to this, we do not consider the Proposed Core Strategy Policies (comprising Policies SG7, SG17 and SG15) regarding Mixed Use Sites to be effective. In order to bring forward the allocated 'Acordis' (Acetate Products) site, approximately 50% (i.e. 4.67 hectares or 11.674 acres) of the site would be required to deliver a viable scheme. This is because in order to have a viable scheme that would cross subsidise the redevelopment of the wider site, it would have to be based on family dwellings, not apartments and therefore would need to provide for at least 150 family dwellings (at 30 dwellings per hectare).

5.11 Presently, Policy SG7 and Table 3 state the Acordis site could accommodate 90 dwellings. Going on the areas for development identified in Table 4 of the Proposed Submission document, these would have to be provided on approximate 20% of the site or 1.87 hectares. The density of development would therefore be 48 dwellings per hectare, which clearly could not be accommodated through developing the site for family dwellings. This level of density would also not accord the Proposed Submission Policy SG12, which requires developments take account of the local context and existing density and building characteristics, since the surrounding residential uses are family dwellings at a much lower density.

5.12 Policy SG7 notes that developer contributions via Community Infrastructure Levy and/or Planning Obligations may be required to address any deficiency. In this current economic climate a flexible approach to securing contributions should be pursued taking account of viability considerations. It is recommended that this section of the policy should be revised as follows:

'Developer contributions via Community Infrastructure Levy and / or Planning

Obligations may be required to address and deficiency. Reductions from contributions may be considered if it can be demonstrated that the level of contribution required makes the development financially unviable.'

5.13 This approach is promoted by Circular 5/05 which states 'it may not be feasible for the proposed development to meet all the requirements set out in local, regional and national planning policies and still be economically viable.' The Circular goes onto state that 'in such cases, decisions on the level of contribution should be based on negotiations with developers over the level of contribution that can be demonstrated as reasonable to be made whilst still allowing the development to take place.'

5.14 Furthermore, although not formally defined in the Core Strategy, it would appear that at least 10% of the identified 90 dwellings would need to be 'executive homes' as identified in Policy SG10. This would suggest larger family dwellings at a lower density and if the policy framework were to remain in its current form, this would further increase the required density of development, further adding to an unfeasible site.

Officer Recommendation No change

Accordis

Representor number **REP-1160**

Representor : **Acetate**

Company: **Acetate Products Limited**

Agent Details Company: **CB Richard Ellis**

Contact: Laurie Lane

Representation number: **2318** Representation in regard to : **Policy SG 15 : Provision of Employment Land and Premises**

Verbatim Submission

5.15 Therefore, it is not considered that the policy framework of policies SG7, SG10 and SG12 supporting the Mixed Use Site allocations are deliverable. Furthermore, the inflexibility of the policy framework is clearly biased towards the provision of apartments and will consequently undermine the future delivery of the site and would be unable to deal with changing circumstances, particularly were there a further downturn in the economy.

5.16 Finally, Part B of Policy PA1 of the Regional Spatial Strategy requires local authorities developing policies and programmes should ensure conditions in `areas or need, are addressed so they become `areas of opportunity, with particular emphasis in the Regeneration Zones. The current approach taken by the Core Strategy for Mixed Use allocations and the related policies would appear to undermine this key objective, primarily because the mix of employment and residential uses are too prescriptive. Consequently, the policies relating to Mixed Use Site are not considered to have regard to the Regional Spatial Strategy and therefore not in accordance with Section 20 (5) (a) of the 2004 Act.

5.17 In order to make the policies sound, the Mixed Use Policies and supporting Tables 3 and 4, should not stipulate a proportion of development. Instead, each mixed use site should be considered on demonstrated viability and on their individual merits.

Allocation of the `Little Heath Industrial Estate, Strategic Employment Site

5.18 Having reviewed previous submissions made regarding the land held by Acetate Products Limited (also referred to as Acordis in the Proposed Submission Document), we consider the allocation of part of the site east of the canal (Part of Area B) as a `Strategic Employment Site, to be sound.

5.19 As highlighted in the Sustainability Appraisal for Policy SG14 `Overall Economy and Employment Strategy, the, policy cannot ensure employment to the local community, but will promote access to employment and training opportunities from which the whole community can benefit. We therefore consider the continued use of the site for employment purposes to be the most appropriate strategy and therefore it is Justified.

5.20 Furthermore, we consider that since the site is already in employment uses, it is deliverable. Policy SG17 `Mixed Use Redevelopment on Employment Land, provides some future flexibility should the redevelopment of the site solely for employment use become untenable and consequently, we consider the allocation to be effective.

Officer Recommendation No change

Representation number: **2319** Representation in regard to : **Policy SG 17: Mixed use redevelopment of employment land**

Verbatim Submission

Officer Recommendation

Representation number: **2320** Representation in regard to : **Proposals Map**

Verbatim Submission

Officer Recommendation

Affordable Housing

Representor number **REP-1054**

Representor : **Mr Robert Jays**

Company: **William Davis Ltd**

Representation number: **1918** Representation in regard to : **6.47**

Verbatim Submission

William Davis Ltd object to the target percentage requirement for affordable housing established in paragraph 6.47 of the Core Strategy and set out in Policy SG10. Although we welcome the council's production of a 'Preliminary Affordable Housing Viability Assessment' we question the methodology of the assessment and disagree with the reports findings. Consequently we do not believe the affordable housing policy has been justified by a credible and robust evidence base and therefore should not be considered sound.

One of our key concerns with the viability assessment is the fact that it has been calculated using site examples, costs and revenues based on "stable market conditions". The current and emerging market is far from "stable" and the figures used and results obtained in no way represent likely future economic conditions in the housing market for the plan period. We consider that the assessment should be based upon current sales values and costs with reasonable assumed uplift in these over the plan period, but with the figures then discounted to present values by means of a standard discounted cashflow.

We have further specific concerns regarding the overall approach and detailed assumptions as follows:

" The overall approach is too conceptual and not sufficiently transparent. Assumed sales values are not made explicit in the assessment, but by calculation of the figures shown it can be seen that average sales values for the medium scheme equate to £161,000. For the large scheme they average £164,000, and for the small scheme they average £127,000. All of these average values appear far too high. There should be a consistent and transparent approach towards assumed sales receipts.

" Details of site areas and assumed densities should also be set out to allow further scrutiny of the robustness of the assumptions.

" The assumed provision of 25% of apartments is considered excessive. The over provision of flats in the market is such that private developers will not risk this level of provision.

" It is not clear what build costs have been assumed. We would advocate using BCIS with a 10% uplift for private housing.

" It is noted in the Viability Assessment that "No account has been made for Stamp duty Land Tax when considering residual land value". However with Stamp Duty equating to 4% it is a significant cost and should be brought into the calculation.

" Banks are requesting at least 20% return on lending for development. Developer profit should not therefore be assumed at anything less than 20%.

" Increased build costs should be assumed to take account of future change in building regulations in line with higher levels of the Code for Sustainable Homes and the Governments drive towards zero carbon. Significant increases in costs are anticipated beyond Code level 3 in the CLG's own cost estimates (Cost Analysis of the Code for Sustainable Homes - CLG July 2008). These cost estimates show a additional cost of £2030,000 for a code level 5 house and £30-47,000 for a code level 6 house.

" The assumed Section 106 costs are very light. They appear to include education and play provision contributions, but not other likely contributions towards highway improvements, health or other infrastructure provision.

Appropriate adjustment of all of the above factors is likely to significantly reduce the viability of the assessed schemes.

We therefore do not consider the 25% affordable housing requirement to be robustly justified.

Officer Recommendation

No change.

Banner Lane

Representor number **REP-0061**

Representor : **Bestway Holdings Limited**

Agent Details Company: **DPP**

Company: **Bestway Holdings Limited**

Contact: Justin Mills

Representation number: **1722** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

Conclusion = It is inappropriate to allocate the site for housing and the current use of the site is the most appropriate, as evident by the recent successful appeal. Based on the reasons outlined above, we request that the Council remove the proposed allocation for housing in the draft Submission document of the Core Strategy. Furthermore, the draft Core Strategy document is not legally compliant with national policy with respect to allocation of housing sites and is contrary to the employment requirements set out in the WMRSS. A robust and credible evidence base has not been used to justify the housing allocation and therefore, should be found 'unsound'. Finally, we wish to point out that during the course of pre-application discussions between Bestway's agents GL Hearn and the LPA regarding development on the site (June/July 2008), as well as during the course of the application to extend the warehouse unit, no indication was given that the Council were considering allocating the site for housing. Indeed, at the 2008 appeal, the Council suggested that the site would be more appropriate to "accommodate more and possibly large scale intensive employment" (Paragraph 30 of the Inspectorates appeal decision).

Officer Recommendation No change.

Representation number: **1723** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Conclusion

It is inappropriate to allocate the site for housing and the current use of the site is the most appropriate, as evident by the recent successful appeal. Based on the reasons outlined above, we request that the Council remove the proposed allocation for housing in the draft Submission document of the Core Strategy. Furthermore, the draft Core Strategy document is not legally compliant with national policy with respect to allocation of housing sites and is contrary to the employment requirements set out in the WMRSS. A robust and credible evidence base has not been used to justify the housing allocation and therefore, should be found 'unsound'. Finally, we wish to point out that during the course of pre-application discussions between Bestway's agents GL Hearn and the LPA regarding development on the site (June/July 2008), as well as during the course of the application to extend the warehouse unit, no indication was given that the Council were considering allocating the site for housing. Indeed, at the 2008 appeal, the Council suggested that the site would be more appropriate to "accommodate more and possibly large scale intensive employment" (Paragraph 30 of the Inspectorates appeal decision).

Officer Recommendation No change

Representation number: **1724** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

It is inappropriate to allocate the site for housing and the current use of the site is the most appropriate, as evident by the recent successful appeal. Based on the reasons outlined above, we request that the Council remove the proposed allocation for housing in the draft Submission document of the Core Strategy. Furthermore, the draft Core Strategy document is not legally compliant with national policy with respect to allocation of housing sites and is contrary to the employment requirements set out in the WMRSS. A robust and credible evidence base has not been used to justify the housing allocation and therefore, should be found 'unsound'. Finally, we wish to point out that during the course of pre-application discussions between Bestway's agents GL Hearn and the LPA regarding development on the site (June/July 2008), as well as during the course of the application to extend the warehouse unit, no indication was given that the Council were considering allocating the site for housing. Indeed, at the 2008 appeal, the Council suggested that the site would be more appropriate to "accommodate more and possibly large scale intensive employment" (Paragraph 30 of the Inspectorates appeal decision).

Officer Recommendation No change.

Banner Lane

Representor number **REP-1009**

Representor : **Enodis Group Ltd**

Agent Details Company: **CB Richard Ellis**

Company: **Enodis Group Ltd**

Contact: Rachel Hassett

Representation number: **1744** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Policy SG7 and accompanying Table 3 lists all of the sites that will be allocated for residential development and notes the criteria that will be considered when determining applications for residential development. Plot 11 at Banner Park has planning permission for 41 residential units which was secured on the 16th August 2007 (appeal reference APP/U461 0/A/06/2027015). Therefore, the site should have been considered within the Strategic Housing Land Availability Assessment (SHLAA) as an 'unimplemented site'. It has not been confirmed if the site was considered in the assessment and therefore, a SHLAA representation has been prepared to accompany this representation.

The SHLAA highlights that those sites considered deliverable and which have a potential capacity of 50 dwellings or more should be recommended to be allocated as housing sites and included in the Core Strategy Proposed Submission document. Although the planning permission for Plot 11 only comprises 41 dwellings, the site should be allocated for residential use as it already has planning permission. It is also deliverable and developable, in accordance with Planning Policy Statement 3 'Housing' (PPS 3).

PPS 3 sets out the criteria that should be used to assess whether a site is deliverable. Plot 11 accords with this policy criteria as the site is:

- Available - The site is available now;
- Suitable - Residential development is compatible with the surrounding land uses as residential development is located to the north and south of the site; and
- Achievable - As planning permission has been secured there is a reasonable prospect that housing would be delivered on the site within 5 years (Paragraph 54).

PPS 3 goes on to note that for sites to be considered developable, they should be in a suitable location for housing development and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged (Paragraph 56). By virtue of the site satisfying PPS 3 deliverable criteria the site is also considered to be developable. Policy SG7 notes that developer contributions via Community Infrastructure Levy and/or Planning Obligations may be required to address any deficiency. In this current economic climate a flexible approach to securing contributions should be pursued taking account of viability considerations. It is recommended that this section of the policy should be revised as follows:

'Developer contributions via Community Infrastructure Levy and / or Planning Obligations may be required to address and deficiency. Reductions from contributions may be considered if it can be demonstrated that the level of contribution required makes the development financially unviable.' This approach is promoted by Circular 5/05 which states 'it may not be feasible for the proposed development to meet all the requirements set out in local, regional and national planning policies and still be economically viable.' The Circular goes onto state that 'in such cases, decisions on the level of contribution should be based on negotiations with developers over the level of contribution that can be demonstrated as reasonable to be made whilst still allowing the development to take place.' We therefore find that policy SG7 and Proposals Map in respect of Plot 11 are unsound. This is because it is not considered to be justified as the evidence base (the SHLAA document) has not fully accounted for all potential housing land allocations. In order to address this, it is considered that Plot 11 should be allocated for residential use. Furthermore, policy SG7 has not fully accounted for national planning guidance when considering making reference to developer contributions.

Officer Recommendation

Minor change. Plot 10 and 12 in SHLAA.

Banner Lane

Representor number **REP-1009**

Representor : **Enodis Group Ltd**

Agent Details Company: **CB Richard Ellis**

Company: **Enodis Group Ltd**

Contact: Rachel Hassett

Representation number: **1745** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

Policy SG 14 specifies the approach that will be taken to ensure a good range of employment sites and premises are available. The policy promotes:

'Office, retail and leisure employment generating developments within the City Centre to provide 50% of new jobs in Coventry'.

It is recommended that the policy SG14 is supplemented to ensure the delivery of a range and choice of employment sites. It is suggested that the following text should be inserted:

'An evidenced based approach will be adopted when considering employment development on non allocated sites. This should consider market and economic data along with social and environmental factors. '

PPS 6 'Planning for Town Centres' notes that local authorities should work in conjunction with stakeholders and the community to set out criteria based policies, in accordance with this policy statement, for assessing and locating new development proposals, including development on sites not allocated in development plans (paragraph 2.26).

The recommended policy approach would also accord with the draft PPS 4 'Planning for Prosperous Economies' (May 2009). Local Planning Authorities are encouraged to adopt a positive and constructive approach to applications for economic development. Applications in accordance with the development plan should normally be approved. For applications other than the main town centre uses authorities should consider proposals favourably unless there is a good reason to consider costs outweigh the benefits. Authorities should take a constructive approach to changes of use unless there is demonstrable harm. An evidence based approach should be adopted to applications not in accordance with the development plan, weighing market and other economic data alongside environmental and social and taking full account of long term benefits and the wider objectives of the LDF. Policy SG14 is considered unsound as it does not fully reflect national planning policy. Furthermore, in its current state the policy is not effective as it does not provide the flexibility to deliver the aspirations of the Core Strategy as set out at paragraph 6.68 which states:

'In order that a balanced economy is maintained, with a diverse employment base, the priorities of Coventry are to.... ensure a range and choice of employment premises are available at all times.'

Officer Recommendation No change.

Representation number: **1746** Representation in regard to : **Proposals Map**

Verbatim Submission

In accordance with the proposals map plots 10 and 12 are 'white land', which is considered to be sound. This approach is effective as it provides the flexibility for development to come forward that is receptive to local market requirements, the needs and character of the local area and objectives of the Core Strategy. Both sites present valuable development opportunities as they are sustainable brownfield sites located within in the urban area. Plots 10 and 12 are well served by local amenities with numerous schools, shops and services in the surrounding area. Both sites are also well served by public transport including a number of bus services operating along Banner Lane and train services at Tile Hill Station. There are no physical constraints that would impede redevelopment.

Officer Recommendation Insert plots 10 and 10 into SHLAA

Browns Lane

Representor number **REP-1006**

Representor : **Mr John Willis**

Company: **Allesley and Coundon Wedge
Conservation Society**

Representation number: **1732** Representation in regard to : **Policy SG 12: Residential Density**

Verbatim Submission

We welcome the provisions of Policy SG12 on residential density, especially the requirement to take account of local context, existing density and building characteristics and the impact of the amenities of occupiers of nearby properties. We also welcome the provisions Policy EQ 1, Ensuring High Quality Design and the statement that all developments must respect and enhance their surroundings and positively contribute towards the local identity and character of an area. These provisions are especially relevant to intensive infill projects in existing residential areas, for example developments in back gardens. We believe the potential threat to areas with a high level of distinctiveness, but not enjoying the protection afforded by Conservation Area status (for example Butt Lane in Allesley) is a specific problem and demands to be dealt with in its own right. A paragraph should be inserted within Section 7.

Officer Recommendation

Minor change: para 6.57 "a balance needs to be at end of struck between making best use of land in the urban area and maintaining local character and choice of housing.

Representation number: **1733** Representation in regard to : **7: Protecting and Improving Environmental Quality**

Verbatim Submission

We welcome the Council's commitment to the Green Belt and related open areas, in particular we would make the following comments relative to Coundon Wedge and neighbouring open spaces.

School sites 7.31

We accept the arguments for removing Coundon Court School from the Green Belt as long as the associated provisions are strictly adhered to, in particular:

ensuring that the visual amenity of the remaining Green Belt is not significantly damaged, or the continuity and integrity of green wedges compromised
maintaining the overall amenity in the surrounding area, particularly in relation to existing housing Areas where Green Belt is proposed, paragraph 7.33

The return of the land north of the former Jaguar factory off Browns Lane to the Green Belt and its consideration as integral to Coundon Wedge is both logical and positive.

Officer Recommendation

Support welcomed

Representation number: **1734** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

The section on Industrial or Commercial Buildings offers guidelines only for developments within the Green Belt. There is a need for similar guidelines for 'developments overlooking the Green Belt (e.g the former Jaguar site overlooking Coundon Wedge), in the same way as is proposed for schools (see paragraph 7.31 above).

Officer Recommendation

No change.

Representation number: **1735** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission

The proposal of the stretch of land along the banks of the River Sherbourne, as it runs through the south-western part of Coundon Wedge and then out into the fields beyond Browns Lane, as a provisional Local Wildlife Site is a positive addition towards safeguarding and enhancing the biodiversity of the area.

Officer Recommendation

Support welcomed.

Banner Lane Wickmans

Representor number **REP-1008**

Representor : **Enodis**

Company: **Enodis**

Agent Details Company: **CB Richard Ellis**

Contact: Laurie Lane

Representation number: **1739** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Banner Park was previously part of Wickmans industrial works, which closed in 1992. In 1999, it formed part of a wider site that was the subject of a planning permission for mixed employment and residential development (application reference: 99/45698Aj and appeal reference APP/U4610/N98/296794/P7). Since securing planning permission for a mixed use scheme in 1999 plots 10, 11 and 12 have remained vacant and the initial outline permission has expired for the submission of reserved matters.

Banner Park is located approximately 4 miles to the west of Coventry City Centre. All three plots are accessed via Banner Lane leading onto Wickman's Drive, with access to the wider road network via the Coventry Highway (A45) to the east. The former AGCO works site is located immediately to the north of Banner Park. This site has historically been in manufacturing use but Persimmon Homes secured planning permission for the comprehensive redevelopment of this site for a mix of uses including a substantial element of residential (LPA ref. 52000). As part of the mixed use scheme at the AGCO site, residential properties as are located immediately to the north of plots 10 and 11. Further residential development is located to the south of Plots 10, 11 and 12, which has been brought forward as part of the mixed use scheme approved at Wickmans industrial works. Banner Lane and Tile Hill Woods form the eastern boundary of Banner Park with Green Belt to the west. Tile Hill Railway Station is within close proximity, approximately 0.8 miles (1.3km) to the south of Banner Park, with direct and regular services to Birmingham New Street (30 minutes) and Coventry (7 minutes). There are existing bus stops located approximately 400m to the south of Banner Park on Banner Lane. Services operating along Banner Lane are the 32C and the 34. The 32C provides bus services every 30 minutes during the day and every 30/60 minutes in the evening on week days to locations including Tile Hill and Coventry City Centre. The number 34 provides a link every 20 minutes to Walsgrave Hospital, Coventry City Centre and the Tile Hill railway station. Banner Park is well served by local amenities with numerous schools, shops and services in the surrounding area. A schedule of local services is attached for reference.

The general topography of the sites is as follows:

Plot 10 (0.67 hal is flat;

Plot 11 (approx 2.00 hal gently undulates; and

Plot 12 (approx 0.72 hal includes a drainage pond, which lies at a lower level to that of main site, which gently undulates. As far as constraints are concerned, the sites can be easily accessed off Wickmans Drive and there are no requirements for additional infrastructure to deliver them. There are no legal issues, known hazardous risks or flood risk issues as the sites are located in Flood Zone 1 (low risk). There are two trees on Plot 12, which are subject to Tree Preservation Orders (TPO's) and a balancing pond. Inclusion of plots 10, 11 and 12 within the SHLM as housing land for future development would correspond with the provisions outlined in Planning Policy Statement 3 (PPS3, 2007). PPS3 seeks a flexible supply of land and states that LDF's must enable continuous delivery of housing for at least 15 years from date of adoption, taking into account the housing requirements in the Regional Spatial Strategy. A new requirement is for LDF's to maintain a rolling five year supply of deliverable housing sites. Furthermore, LDF's must also identify a supply of specific developable sites for six to ten years and where possible eleven to fifteen years, as well as strategic sites.

Officer Recommendation

Minor change. Add plots 10 and 12 to SHLAA

Banner Lane Wickmans

Representor number **REP-1008**

Representor : **Enodis**

Company: **Enodis**

Agent Details Company: **CB Richard Ellis**

Contact: Laurie Lane

Representation number: **1740** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

Coventry City Council, in determining the suitability of sites for residential development, applied the deliverable and developable criteria as promoted by PPS 3. Paragraph 54 of PPS3 states that sites are deemed to be 'deliverable' if they are available, suitable (in terms of location and contribution to the creation of sustainable, mixed communities) and achievable (i.e there is a reasonable prospect that housing will be delivered on the site within five years). In accordance with paragraph 56 of PPS3, to be considered 'developable' sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available for development, and that the site could be developed at the point envisaged.

In context with paragraph 54, 'deliverability' criteria, Plots 10, 11 and 12 are available now as they are currently vacant with no existing structures on site. Residential development is considered appropriate as residential properties are located to the north and south of the plots. In particular the suitability of Plot 11 is highlighted by the fact that planning permission was secured for 41 residential units on 16th August 2007 (appeal reference APP/U4610/N06/2027015)). All three plots are sustainably located within close proximity to public transport services as well as a variety of local services and amenities, which further the suitability of the sites for residential development. Furthermore, as the City Council is proposing 100+ dwellings as an allocation on the former AGCO site, we assume that the Council is satisfied at the general appropriateness of this area for housing within proposed Policy SG7 of the Core Strategy Submission. In terms of achievability it is considered that all three sites could come forward within the next 5 years. There are no legal or physical constraints that would prevent development. The sites meet the criteria set out in PPS3 for the identification of 'developable' sites.

In accordance with the 'deliverability' criteria of PPS 3 the sites are considered to be in a suitable location to support residential development. They are all available to be delivered within the next 5 years and Enodis would welcome the opportunity to work with the Council in order to facilitate delivery. The sites meet the criteria set out in PPS3 for the identification of 'deliverable' sites.

Conclusions

Inclusion of Plots 10, 11 and 12 within the SHLAA document for future residential development would correspond with the provisions outlined in national guidance. I trust that this representation will be duly considered during the revision of the document. I would be grateful if you could provide confirmation that our comments have been received.

Officer Recommendation

Minor change. Add plots 10 and 12 to SHLAA

City Centre

Representor number **REP-1005**

Representor : **Corovest Modus**

Company: **Corovest Modus**

Agent Details Company: **Drivers Jonas**

Contact: Julie Chowings

Representation number: **1726** Representation in regard to : **4: Vision and Objectives**

Verbatim Submission

Our client supports the key vision for Coventry which seeks to ensure that Coventry is a 'growing, accessible city where people choose to live, work and be educated and businesses choose to invest' (p.20). The Core Strategy also outlines how it will seek to achieve the objectives set out in the Council's Sustainable Communities. A key theme of the Sustainable Communities Strategy is to create a 'a prosperous Coventry with a good choice of jobs and business opportunities for all city's residents' (p.20). Our client supports this objective and considers that the Core Strategy's objective of promoting the role of Coventry City as a subregional centre will be a important factor in achieving this aim.

Officer Recommendation Support welcomed

Representation number: **1727** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

This section sets out a Spatial Strategy to guide growth in Coventry. Paragraph 5.7 states that Coventry City Centre is currently the focus of jobs, shops, civic functions, business, transport connections, many social and cultural facilities, education opportunities and residential accommodation. It also states that the key theme of the Core Strategy is to enhance the role of the city centre and 'make the City Centre better placed to serve as the focus of Coventry and Warwickshire subregion ' (p.28). The Spatial Strategy objective of achieving an accessible city (paragraph 5.19) states that development should be located close to existing infrastructure to reduce the need to travel by car. Our client supports this stance and considers that development should be focussed in the city centre to support sustainable development.

Officer Recommendation Support welcomed

Representation number: **1728** Representation in regard to : **6: Delivering Sustainable Growth**

Verbatim Submission

This section sets out the City Council's strategy for delivering sustainable growth. It considers the important elements of this spatial growth including housing, jobs and the City Centre. The City Centre section of the Submission Core Strategy sets out a broad framework 'for the transformational change to achieve a mixed-use City Centre that includes shopping, offices, housing, leisure, education and cultural uses' (p.62). It also states that the adopted Core Strategy will provide a framework for a future Coventry City Centre Area Action Plan (MP). The supporting text to the Core Strategy states that the Regional Spatial Strategy Preferred Option Policy PA12A (December 2007) sets out a requirement to create 95,000sqm gross comparison shopping floorspace for the City Centre between 2006 and 2021 (which will be reduced to 60,000sqm taking into account new developments by Primark and Ikea) and a further 55,000sqm gross between 2021 and 2026. However, the Core Strategy also states that a further study as part of the Sustainable Communities Strategy has indicated that there will be a need for additional comparison floorspace producing a capacity figure of 90,400sqm up to 2021 across the whole of the city. Our client considers that the majority of the additional retail provision should be concentrated in the retail core of city centre to enhance the viability and vitality of the centre.

Officer Recommendation Support welcomed

City Centre

Representor number **REP-1005**

Representor : **Corovest Modus**

Company: **Corovest Modus**

Agent Details Company: **Drivers Jonas**

Contact: Julie Chowings

Representation number: **1729** Representation in regard to : **6: The City Centre**

Verbatim Submission

This sections outlines the key messages from the City Centre consultation and sets out a City Centre Strategy Policy. The consultation responses stated that there is a need to build on the existing strengths and character of Coventry, and enable the city to accommodate radical changes demanded from its retail, employment and residential markets. Responses also stated that Coventry needs to become a hub for the whole sub-region. Policy SG19 (City Centre Strategy) states that the City Centre should be developed to 'make it a more attractive place for the City-wide community and the wider Sub-region' (p.64). As well as supporting a high quality environment the policy states that 'vital, viable and growing shops, services and leisure attractions' should be encouraged that operate 'around the clock' (p.64). Our client supports this policy and considers that this will be achieved by focussing retail and leisure developments within the existing retail core of the City Centre.

The City Centre Boundary, Quarter and Links (p.66)

The Core Strategy goes on to outline a framework of ten quarters in the city centre which it is considered will provide a major focus in land use terms. Our client considers that connectivity and pedestrian links within, and between, the identified areas will be crucial in ensuring that the city centre provides a cohesive focus for development. The Submission Core Strategy refers to the appointment of the international architects Jerde Partnership to create a masterplan for a new city centre (paragraph 6.91). The masterplan, which was adopted at Cabinet on 10 March 2009, was developed in partnership with city centre investors, including our client. The masterplan outlines plans for a substantial increase in the city's retail offer and sets out an objective to significantly improve the city centre environment for both shoppers and visitors. Our client supports the Jerde Masterplan for Coventry City Centre and considers that it provides an example of concerted and coordinated efforts by city centre stakeholders to improve the retail offer of the city centre and meet the required growth agenda. In addition, our client considers that it is essential that retail growth is focussed within the existing centre to promote the city centre's vitality and viability. The Precinct, as the traditional retail core of the city centre which includes the defined primary retail area, is identified as the focus for new shopping development. Our client strongly supports this and wishes to ensure that the majority of retail growth continues to be focussed within the existing retail area of the city centre. More specifically, they encourage such growth within the northern sector of the city centre as this will ensure that future retail development builds upon the strengths of the existing city centre and its Vitality and Viability is enhanced. The Core Strategy proposes that the existing primary shopping area is extended to the north to include Upper Well Street and Bishop Street and to the east to include High Street and New Union Street (known as Shopping Expansion Areas). Our client considers that the existing shopping area should continue to be the main focus for retail development to ensure that the role of the city centre is strengthened and enhanced. When the Core Strategy is reviewed in 2021, if it is necessary to extend the primary shopping area, our client considers that the boundary should be extended to include the area to the west of the retail core. An extension of the primary retail frontage to this location would strengthen the retail core as it is adjacent to the Precinct area where there is the potential to enhance linkages.

Officer Recommendation No change

Representation number: **1730** Representation in regard to : **9: Achieving sustainable Communities and a Better Sense of Place**

Verbatim Submission

The Submission Core Strategy sets out a network of centres in which a sequential approach will be adopted to ensure that major comparison shops are located within the city centre. Policy SCi outlines the network of centres and objectives for each. Our client wishes to ensure that any proposals for retail growth in lower hierarchy centres should not undermine the vitality and viability of, or compete with, Coventry City Centre. In addition, our client consider that any out-of-centre retail development should be resisted to ensure that the city centre is the primary focus for retail development.

Officer Recommendation No change

City Centre

Representor number **REP-1059**

Representor : **Ms L Millett**

Company: **CV ONE**

Representation number: **1931** Representation in regard to : **6.109**

Verbatim Submission

As Coventry's city centre management company, CV One has considered the city council's core strategy for future development and is fully supportive of the policies outlined therein. The company applauds the scale and ambition of regeneration proposed for the city, and looks forward to working as a close partner to achieve the aims set out.

The only minor cautionary note CV One wishes to sound concerns the identification of the Greyfriars quarter (formerly Friargate) as the principal focus for the new office development in the city centre. If this is to become policy, it is vital that the links to the rest of the city centre within the ring road encourage pedestrian flow.

Officer Recommendation

Minor change to para 6.109 delete "the principal" insert "a significant"

Cromwell Lane

Representor number **REP-1011**

Representor : **Miss Susan Keyte**

Representation number: **1756** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

In response the news that there are going to be so many new houses built on green belt land behind Cromwell Lane, I felt I must let you know my real concerns which are,

- 1) So many new houses are going to increase the amount of cars on Cromwell Lane which is already struggling to cope.
- 2) Building on green belt surely must be a bad thing as there must be brown land in Coventry which would be more sensible.
- 3) Is there a real need for so many new swellings in a city which has less and less employment available.

Officer Recommendation No change.

Representor number **REP-1015**

Representor : **Mr Peter Hutchinson**

Representation number: **1779** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

The Coventry City Development Plan Document is unsound because it is based on the unproven Nathaniel Lichfield Report which should be carefully analysed and assessed for accuracy and announced for public scrutiny before the Core Strategy is created or accepted. The pledge by the Prime Minister that 3m new homes would be built across the UK cannot be taken seriously and without question as it is such a 'rounded off' figure that it could have been withdrawn from a hat.

Officer Recommendation No change.

Representor number **REP-1016**

Representor : **Dr Jane Martin**

Representation number: **1788** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

The failure to consult residents demonstrates that there has been a failure of due process.

Officer Recommendation No change

Representor number **REP-1020**

Representor : **Mr John Levett**

Representation number: **1803** Representation in regard to : **5.12**

Verbatim Submission

Re Legality, I am not sure how you expect a normal member of the public to be able to assess the legality of the document. Re Soundness, The potential requirement for additional housing appears to have been exaggerated, not helped by the inflated proposals contained within the Nathaniel Lichfield report. I am not qualified to comment about most of the content the document, but I am interested in its impact on the area closest to my home. I am pleased to see that the areas including Cromwell Lane and Duggins Lane are considered as "Safeguarded Land", but concerned that they are described as being able to be developed within existing and planned infrastructure. Previous developments in this part of Coventry have ignored the effect on the existing infrastructure in the immediately adjacent areas which happen to fall in different Local Authority areas, namely Warwickshire and Solihull. I sincerely hope that, should these areas need to be developed in the future, that the impact on all local infrastructure be assessed and any appropriate changes be funded as part of Coventry's project

Officer Recommendation No change.

Cromwell Lane

Representor number **REP-1027**

Representor : **Mr Robert Booth**

Representation number: **1827** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission Unsound because the housing said to be required is derived from a projection of new jobs to 2026 that is too high and cannot be sustained

Officer Recommendation No change

Representor number **REP-1036**

Representor : **Professor Stewart Ranson**

Representation number: **1850** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission The failure to consult residents demonstrates that there has been a failure of due process.

Officer Recommendation No change

Representor number **REP-1039**

Representor : **Mr Dean Taylor**

Representation number: **1855** Representation in regard to : **Policy EQ 1 - Ensuring High Quality Design**

Verbatim Submission I appreciate that Coventry is required to identify land for new homes to meet the housing target in the Coventry core strategy. However I have grave concerns regarding green field extensions to Coventry in the Cromwell Lane, Duggins Lane area.

Regarding paragraph 7.13 and policy EQ1

There are 3 listed buildings on Cromwell Lane that will have their rural environment directly affected, and 2 on Duggins Lane. I am the owner of one of them, 'Cromwell Cottage' or historically 'The Stonehouse' (a grade 2 listed building) on Cromwell Lane, It is a significant historical building which would have its environment severely impacted by the proposed development. Westwood Farm, a grade 2 listed building with its barns/cottages also within the curtilage listing will be the most affected building. This farm would completely lose its rural setting, with any development surrounding it. There are also ancient footpaths running between these buildings, which were there before the roads were built. These would also be lost. I have spoken to English Heritage about this issue. They were alarmed at the extent of impact development would have on so many listed buildings. They commented that because these buildings were built as rural buildings they need to retain that environment. They need more space than town buildings which are at home in a built up setting. George Demidowicz in the conservation department should also have been consulted about this aspect. I would also like to comment on the overall volume of new housing proposed. The balance of new development would enormously outweigh existing properties in the area, resulting in extensive urban sprawl. Whilst it may be necessary to look at green field development, I think the above issues show that this specific site is inappropriate for potential development.

Officer Recommendation Minor change.

Insert to new appendix 3 - Land at Cromwell Lane

Area of Green Belt land and existing ribbon development on the west of Cromwell Lane which includes a listed building, an ancient footpath and hedgerow and some known archaeological remains. Release of land for development will be considered if the housing land supply were to fall below a 5 year reservoir, in which event the Local Authority expects innovative development which takes advantage of the site's accessibility to Tile Hill railway station and has regard to the setting of a listed building. Appropriate archaeological surveys and/or other studies will be required before development can commence

Representor number **REP-1045**

Representor : **Mrs Jennifer Coleman**

Representation number: **1877** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission I have not been given an opportunity to comment on the proposal (as regulation 25 requires) as I believe is my right to do so, as my property could be adversely affected by a development

Officer Recommendation No Change.

Cromwell Lane

Representor number **REP-1050**

Representor : **Mr Peter Spiers**

Representation number: **1907** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

- 1) Is it the intention of the planning dept to make Solihull and Coventry into one continuous built up area, (ie Birmingham/Solihull) with no green belt separation?
- 2). Cromwell Lane traffic has increased enourmously since the construction of the Tile Hill railway bridge.
- 3). The area's roads are not suitable for the 40 ton trucks presently using them, further vehicle use due to over 500 new houses would be chaotic.

Officer Recommendation No change

Representor number **REP-1051**

Representor : **Mrs Norma Bramwell**

Representation number: **1910** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

As a resident council tax payer, I think I should have been informed of any planning to the rear of my property

Officer Recommendation No change.

Cromwell Lane

Representor number **REP-1052**

Representor : **Mr Paul Carrington**

Representation number: **1911** Representation in regard to : **7.24**

Verbatim Submission

1. How can land be re-classified from "Green belt" to "Protected" without prior consultation with the residents directly affected by the decision?
2. What justification is there to convert economically viable arable farm land to housing?
3. Which UK law or statute permits the re-classification of "green belt" to "protected" land?
4. Coventry's local economy no longer produces manufactured goods or at least, any such goods in quantities sufficient to sustain large numbers of employees - it now produces goods and services that is sustained by low paid employees. The engineering skill base that used to predominate Coventry's economy is significantly lower than previously. How can people on low incomes afford the price of a typical new house?
5. What economic forecast justifies the need for additional housing in this area of Coventry?
6. The Council acted unlawfully - in my opinion - by reclassifying the land in question. In a democracy, such things must be done openly, and allow the people the opportunity to comment, debate or consult on such matters. We are only now at this point, but the position from which we are having to make our views is significantly weakened by the Council's unilateral decision. A fair and just process would've been evident had the Council not taken the decision to re-classify the land in question in the first place.
7. What area of un-used, ex industrial land exists in the Coventry area? How much of that has been considered in the strategic housing plan?
8. Building houses for the sake of achieving a Government statistic is not justification for building houses. The local economy must drive the need for it. What is the economic justification?
9. The West Midlands region has been badly affected by the recession. Demand for Council owned housing probably out strips demand for private housing - as repossessions increase. Are the Council planning to make the designated area a new Council owned estate?
10. What consideration has been made for the significant impact of the additional housing will have on the local road infrastructure? The expected increase in pollution from noise and carbon monoxide will transform this semi-rural district. We residents should be given rights for compensation, as the impact on the value of our houses will likely see their value decrease.
11. The new bridge on Cromwell Lane has significantly increased road traffic to the extent where exiting my drive each morning can take more than 5 minutes. The road is far more dangerous a thoroughfare than it was prior to the bridge going in. The additional (proposed) housing will only exacerbate the situation. I believe the road infrastructure will not cope with the increased demand from the proposed new housing residents.

Officer Recommendation

No change

Cromwell Lane

Representor number **REP-1052**

Representor : **Mr Paul Carrington**

Representation number: **1912** Representation in regard to : **7.33**

Verbatim Submission

1. How can land be re-classified from "Green belt" to "Protected" without prior consultation with the residents directly affected by the decision?
2. What justification is there to convert economically viable arable farm land to housing?
3. Which UK law or statute permits the re-classification of "green belt" to "protected" land?
4. Coventry's local economy no longer produces manufactured goods or at least, any such goods in quantities sufficient to sustain large numbers of employees - it now produces goods and services that is sustained by low paid employees. The engineering skill base that used to predominate Coventry's economy is significantly lower than previously. How can people on low incomes afford the price of a typical new house?
5. What economic forecast justifies the need for additional housing in this area of Coventry?
6. The Council acted unlawfully - in my opinion - by reclassifying the land in question. In a democracy, such things must be done openly, and allow the people the opportunity to comment, debate or consult on such matters. We are only now at this point, but the position from which we are having to make our views is significantly weakened by the Council's unilateral decision. A fair and just process would've been evident had the Council not taken the decision to re-classify the land in question in the first place.
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10. What consideration has been made for the significant impact of the additional housing will have on the local road infrastructure? The expected increase in pollution from noise and carbon monoxide will transform this semi-rural district. We residents should be given rights for compensation, as the impact on the value of our houses will likely see their value decrease.
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Officer Recommendation

No change

Cromwell Lane

Representor number **REP-1053**

Representor : **Mr Colin Davenport**

Representation number: **1913** Representation in regard to : **6.3**

Verbatim Submission

HANDS OF OUR GREENBELT - C14c & C13b In common with the Meriden Gap, the above parcels of Warwickshire Green Belt land (Joint Green Belt Study) between Coventry and Kenilworth are a vital buffer, to prevent a creeping erosion of the remaining Green Belt and consequent development of an urban sprawl encompassing the whole of the region. Therefore, Coventry should be obliged to forever focus upon evermore efficient use of all the land and brown field sites within it's existing boundaries, which are more than capable of satisfying current and future housing growth for the foreseeable future Remember, there are adults and children living in London today, who never get to see and observe the countryside and live non-domestic animals - we don't want our descendants to be lumbered with a similar environment resulting from the decisions of today

Officer Recommendation No change.

Representation number: **1914** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

HANDS OF OUR GREENBELT - C14c & C13b In common with the Meriden Gap, the above parcels of Warwickshire Green Belt land (Joint Green Belt Study) between Coventry and Kenilworth are a vital buffer, to prevent a creeping erosion of the remaining Green Belt and consequent development of an urban sprawl encompassing the whole of the region. Therefore, Coventry should be obliged to forever focus upon evermore efficient use of all the land and brown field sites within it's existing boundaries, which are more than capable of satisfying current and future housing growth for the foreseeable future Remember, there are adults and children living in London today, who never get to see and observe the countryside and live non-domestic animals - we don't want our descendants to be lumbered with a similar environment resulting from the decisions of today

Officer Recommendation No change

Representor number **REP-1055**

Representor : **Mr Colin Perkins**

Representation number: **1924** Representation in regard to : **TABLE 2: COMPONENTS OF HOUSING SUPPLY 2006 TO 2026**

Verbatim Submission

Paragraph 6.29 Table 2
Components of housing supply 2006-2026
Objection to the proposed housing development at Cromwell Lane.
The proposed building of 390 houses together with the already authorised building of over 100 dwellings on the Disabled Sports Centre site would have a major impact on this semi rural area.
Present levels of traffic, both private and commercial, are at present causing major problems to residents, both with accessibility and road safety issues.
Paragraph 6.58 SG12 Residential Density Guidance notes state the following:
Residential development will be expected to make the most efficient use of land whilst taking account of;
The local context
Existing building characteristics
The highway network and access arrangements
Requirements for open space
Accessibility to local centres and public transport routes
The impact of the amenities of occupiers of nearby properties.
If the proposed development went ahead all the above points could not possibly have been afforded the consideration they require.
Paragraph 7.13 of the Core Strategy.
"Protecting our Heritage" states development affecting conservation and listed buildings will only be permitted if it Preserves or Enhances their Character, Appearance or setting.
This development would obviously fail on all accounts.
This proposal seems to be an easy option to comply with central government directives with scant regard to the residents and environmental issues that are already under extreme pressure.

Officer Recommendation no change.

Cromwell Lane

Representor number **REP-1058**

Representor : **Mr & Mrs Cramp & Miss Robinson**

Company: **Miss Barbara Robinson et al**

Representation number: **1930** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

CROMWELL LANE - EROSION OF GREEN BELT

The majority of Cromwell Lane residents will have chosen to live there because of the adjacent Green Belt, affording a peaceful and pollution free environment. The Building of a housing estate would ruin their outlook and cause much extra noise and pollution. There would also be extra traffic on Cromwell Lane - already very busy at peak times - and in the already congested Tile Hill village.

Therefore, we consider this part of the DPD unsound.

Furthermore, the expansion of the City will lessen the green belt which now effectively separated Coventry from Birmingham.

Officer Recommendation

No change.

Cromwell Lane

Representor number **REP-1075**
Representor : **Mr Charles McDonald**

Representation number: **1996** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Paragraph 6.29 Table 2. Objection to the proposed housing development at Cromwell Lane/Duggins Lane indicated in Table 2 paragraph 6.29.

Cromwell Lane is a semi-rural area in Coventry's Western boundary. There are approximately 150 houses on Cromwell Lane from Duggins Lane to the city boundary just above Westwood Heath Road. The proposed housing development specifies 390 houses to the west of Cromwell Lane. When added to the Bellway(Disabled Centre site) development of over 100 houses, this means a net increase of more than 500 homes. The existing homes are mainly detached with many having their own drives and set back from the road. The proposed developments will completely change the character and context of the area with more than twice the number of new homes being built compared to existing properties. It will also destroy the outlook from Cromwell Lane across the green belt thus having a serious impact on the amenities of those living on the Western side of the lane. Cromwell Lane is a "c" classification road which is already blighted by excessive commuter traffic and large goods vehicles subjecting it to volumes of traffic for which it was never designed. The addition of 500 homes with the associated increase in local traffic (modern trends of 2 cars per family) will result in another 1000 cars accessing this already congested road.

Paragraph 6.58 SC12 Residential Density guidance notes states the following;

'Residential development will be expected to make the most efficient use of land whilst taking account of:-

The local context

Existing building characteristics

The highway network and access arrangements

Requirements for open space

Accessibility to local centres and public transport routes

The impact of the amenities of occupiers of nearby properties'

Cromwell Lane also has a number of listed buildings which will be affected by these proposals.

Cromwell Cottage has already suffered from inappropriate building adjacent to it with the old Disabled Centre. This thankfully has now been demolished. However, the already approved Bellway site will also encroach on this historical building and the proposed new development will completely envelop it.

Westwood Farmhouse 118 Cromwell Lane is a grade 2 listed building with two adjacent houses all standing in their own lane remote from Cromwell Lane with their own drive. As far as I can see, if these proposals are carried out, the farm and houses will be completely surrounded by a housing site.

Thatched Cottage at 143 Cromwell Lane is another listed building which will be on the edge of the proposed housing estate.

Paragraph 7.13 of the Core Strategy 'Protecting our Heritage' states:- Developments affecting conservation and listed buildings will only be permitted if it preserves or enhances their character, appearance or setting.

Policy EQ1 'Ensuring high quality Design' states:- All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area. Statutory conservation areas and buildings and sites of national architecture, archaeological or historic interest will be protected.

This proposed development is totally inappropriate in an area which has already suffered at the hands of the city planners in terms of traffic, pollution and noise. This latest proposal will totally change the area and seems to ignore the guidelines and instructions contained in the core strategy itself. It will have a serious effect on the setting and appearance of the listed buildings around and within the proposed development area. It will also have a significant effect on the people of Burton Green on the other side of the city boundary who will also suffer additional traffic pollution and noise,

Officer Recommendation No change.

Cromwell Lane

Representor number **REP-1078**

Representor : **Mr Graham Johnson**

Company: **Johnson Brothers (Coventry)**

Representation number: **2003** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

We object to removal of land from the Arden Green Belt- particularly "Cromwell Lane", which represents a piece of land set high on the heath, visible to many visitors, and the local community. It has historical links and listed buildings, also archaeology, rural Rights of Way over and bordering, environmental-wildlife factors, and therefore an amenity for many people.

SECTION 6 We do not agree with proposed "required" housing figures (6.29) and related jobs regardless, there are many other options within the Coventry boundary, but the time scale i.e. the consultation period has prevented a fuller submission. The policy set out in SECTION 7 should be followed but there are also many missing considerations, reinforcing the view that Cromwell L Green Belt should not even be considered for removal. 7.24 refers to "valuable landscape and wildlife features", "out door recreation". The Arden ("old Warwickshire") countryside is unique in a national context, and this area has particular features. N.B. The Green Belt Study, recognised the value and proposed this be retained.

AMENITY(6.58 SG 12 Residential Density) As we have a valuable 'resource' in the region-the Westwood heath in Arden Countryside, cannot recreated elsewhere, and it is linked to quality of life, and to various communities within the area. The land represents an isolated piece of land at the Coventry boundary extremity.

ACCESS There is no access to the land. Bordered by railway line/ Bellways brown field development, and this has little area for no more than one road between Grade 2 Listed building and rail flyover. Bellways 140/ +390 houses=530-circa1060 CARS dangerously exiting the end of the bridge, plus 50 from Duggins Lane proposal's" boundary is historic Arden Belt behind Nailcote Hall up to Berkswell. The 4t h is private properties.

AVAILABLE LAND-Calculation of land available for actually building is questionable. The CS map/plan obscures present properties on west side Cromwel L, including Listed buildings e.g. Westwood farm and equally on the main plan, unmatched colouring under which are our properties-confirmed now by CCC as "erroneous". Therefore the total area has been over stated, together with extensive network of sterilisation easements.

ENERGY EASEMENTS A/ National BPAHigh Pressure Fuel/oil pipeline, B/ 1966/7 High Voltage regional cable across middle-unducted. High cost excavation required to duct. C/ High voltage unducted cable D/ Pylons and at North end. The above energy pipelines converge on this field, and with sterilisation easements.

PROPOSAL We propose the following development. This is a way forward to safeguard the special features of this site. In 1960/s the housing bordering the proposed development, and land bordering CROMWELL lane was NOTin the Green Belt. Subsequently it was incorporated into the Green Belt but at a previous review. Coventry City Council recommended that it be removed. I suggest that this earlier proposal by Coventry Council, i.e. removal of the strip of land bordering CROMWELL Lane be removed from The Green Belt. The CS main map/plan has an error. This strip is coloured "erroneously" (as agreed by CCC Planning) as dark green, and this is the land to which we refer. This would enable suitable, sensible in-keeping development, albeit limited and enable sympathetic infill, (as there are existing houses, and the brown field site already has Planning Permission). Building would need to reflect the red brick and styles of the area, whilst protecting hedges and sites.

Officer Recommendation

No change.

Cromwell Lane

Representor number **REP-1078**

Representor : **Mr Graham Johnson**

Company: **Johnson Brothers (Coventry)**

Representation number: **2044** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

We object to removal of land from the Arden Green Belt- particularly "Cromwell Lane", which represents a piece of land set high on the heath, visible to many visitors, and the local community. It has historical links and listed buildings, also archaeology, rural Rights of Way over and bordering, environmental-wildlife factors, and therefore an amenity for many people.

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AMENITY(6.58 SG 12 Residential Density) As we have a valuable 'resource' in the region-the Westwood heath in Arden Countryside, cannot recreated elsewhere, and it is linked to quality of life, and to various communities within the area. The land represents an isolated piece of land at the Coventry boundary extremity.

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main map/plan has an error. This strip is coloured "erroneously" (as agreed by CCC Planning) as dark green, and this is the land to which we refer. This would enable suitable, sensible in-keeping development, albeit

limited and enable sympathetic infill, (as there are existing houses, and the brown field site already has Planning Permission). Building would need to reflect the red brick and styles of the area, whilst protecting hedges and sites.

Officer Recommendation

No change

Cromwell Lane

Representor number **REP-1116**

Representor : **Mr David Birch**

Representation number: **2090** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

6. The Council has not carried out due process to consult all residents - until an article appeared in the Coventry Evening Telegraph (inside pages) recently, no resident in Cromwell Lane from the Tile Hill Station to Westwood Heath Road (the City Boundary) knew of the proposal to build 390 houses on Green belt. Regulation 25 "all residents were given the opportunity to comment on the 2006 issues and options document" is patently not sound.

Officer Recommendation No change

Representor number **REP-1126**

Representor : **Mrs Margaret Cole**

Representation number: **2123** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

Green belt areas should be kept as such and not down-graded or re-classed. No need for more housing when many new-builds in the city are still not sold and several cleared or available sites are still empty. Large volumes of commuter traffic and heavy goods vehicles use Cromwell Lane and the junction with Westwood Heath Road is already particularly dangerous with many accidents, without the addition of many more vehicles should building go ahead.

Officer Recommendation No change

Representation number: **2124** Representation in regard to : **10A: Implementing and Monitoring**

Verbatim Submission

Green belt areas should be kept as such and not down-graded or re-classed. No need for more housing when many new-builds in the city are still not sold and several cleared or available sites are still empty. Large volumes of commuter traffic and heavy goods vehicles use Cromwell Lane and the junction with Westwood Heath Road is already particularly dangerous with many accidents, without the addition of many more vehicles should building go ahead.

Officer Recommendation No change

Representor number **REP-1134**

Representor : **Mr A Taylor**

Representation number: **2136** Representation in regard to : **5.12**

Verbatim Submission

I would like to express my concern of the proposed development of the greent belt between coventry and kenilworth.

I understand pressures on the council to meet government targets but it would be irresponsible to use this area for housing growth.

It is as important for future generations to protect the environment and the countryside for our nation as it is to reduce our carbon footprint. Any encroachment of the green belt between coventry and warwickshire would almost certainly lead in time to its complete absorption. This would be an absolute tragedy and make a mockery of the greenway between coventry and berkswell.

I hope that the council follows the direction of the joint green belt study which recommended that C14 and C13 should be retained as green belt and not succumb to political pressures to develop this area.

Such a decision would destroy the character of the whole area and have significant consequences on its infrastructure.

Officer Recommendation No change.

Representation number: **2137** Representation in regard to : **5.13**

Verbatim Submission

I would like to express my concern of the proposed development of the greent belt between coventry and kenilworth.

I understand pressures on the council to meet government targets but it would be irresponsible to use this area for housing growth.

It is as important for future generations to protect the environment and the countryside for our nation as it is to reduce our carbon footprint. Any encroachment of the green belt between coventry and warwickshire would almost certainly lead in time to its complete absorption. This would be an absolute tragedy and make a mockery of the greenway between coventry and berkswell.

I hope that the council follows the direction of the joint green belt study which recommended that C14 and C13 should be retained as green belt and not succumb to political pressures to develop this area.

Such a decision would destroy the character of the whole area and have significant consequences on its infrastructure.

Officer Recommendation No change

Representation number: **2138** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission

I would like to express my concern of the proposed development of the greent belt between coventry and kenilworth.

I understand pressures on the council to meet government targets but it would be irresponsible to use this area for housing growth.

It is as important for future generations to protect the environment and the countryside for our nation as it is to reduce our carbon footprint. Any encroachment of the green belt between coventry and warwickshire would almost certainly lead in time to its complete absorption. This would be an absolute tragedy and make a mockery of the greenway between coventry and berkswell.

I hope that the council follows the direction of the joint green belt study which recommended that C14 and C13 should be retained as green belt and not succumb to political pressures to develop this area.

Such a decision would destroy the character of the whole area and have significant consequences on its infrastructure.

Officer Recommendation No change

Cromwell Lane

Representor number **REP-1134**

Representor : **Mr A Taylor**

Representation number: **2139** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

I would like to express my concern of the proposed development of the green belt between coventry and kenilworth.

I understand pressures on the council to meet government targets but it would be irresponsible to use this area for housing growth.

It is as important for future generations to protect the environment and the countryside for our nation as it is to reduce our carbon footprint. Any encroachment of the green belt between coventry and warwickshire would almost certainly lead in time to its complete absorption. This would be an absolute tragedy and make a mockery of the greenway between coventry and berkswell.

I hope that the council follows the direction of the joint green belt study which recommended that C14 and C13 should be retained as green belt and not succumb to political pressures to develop this area.

Such a decision would destroy the character of the whole area and have significant consequences on its infrastructure.

Officer Recommendation No change

Representor number **REP-1139**

Representor : **C B Langton**

Company: **Burton Green Resident's Association**

Representation number: **2149** Representation in regard to : **6.28**

Verbatim Submission

Paragraph 6.28 - We believe that the RSS Preferred Option is fundamentally flawed in respect to the 33,500 new dwellings proposed by 2026. This would represent a build rate some three and a half times higher than previous free market rates. This plan does not take adequate account of the state of the economy, consumer confidence, mortgage availability, or demographic and migration trends. Any proposal to annex Green Belt land from adjoining authorities would create permanent damage to Green Belt separation between Coventry and Kenilworth with resultant obliteration of existing semi rural communities such as Burton Green, and is in contravention of declared Government Policy.

Officer Recommendation No change

Representation number: **2150** Representation in regard to : **6.29**

Verbatim Submission

Paragraph 6.29 | 6.30 - Reclassification of Green Belt land at Cromwell Lane and Duggins Lane is stated as being a sustainable urban extension in terms of infrastructure. This takes no account of the impact on the contiguous semi rural area of Burton Green which already suffers an adverse impact on its C classification roads from traffic generated by Coventry's growth.

Officer Recommendation No change

Representation number: **2151** Representation in regard to : **6.66**

Verbatim Submission

Paragraph 6.66 - Employment opportunities in support of proposed housing levels are grossly overstated - for example 22,000 new jobs from the University Hospital Walsgrave and the University of Warwick. Existing growth of the University of Warwick and associated areas has already heavily impacted on traffic volumes in Burton Green.

Officer Recommendation No change

Cromwell Lane

Representor number **REP-1143**

Representor : **AP Martin**

Representation number: **2165** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

We object to removal of any land from the heart of (Arden) Green Belt, in particular "Cromwell Lane", which represents an exceptional piece of land/field, in many respects, and therefore an "asset" and amenity for both the local, and particularly wider Coventry & Warwickshire Community. We do not agree with proposed "required" housing figures (6.29) and related jobs regardless, there are many less destructive options. The policy set out in SECTION 7 acknowledges some of the factors and features, but with additional information, Cromwell LGreen Belt should not even be considered for removal. 7.24 refers to "valuable landscape and wildlife features", "out door recreation". There are a number of major factors, (detailed herewith) omitted by CS and 'body of evidence'. These factors, also supporting the retention of Cromwell Green Belt. (The plan has "errors", re available land area, now acknowledged by CCC). The Arden ("old Warwickshire") countryside is unique in a national context, and this area has particular features. N.B. The Green Belt Study, recognised the value and proposed this be retained. CCC have acknowledged support for Protection of Green Belt. It is of concern therefore that this land has been proposed and for destruction breaking into the Green Belt. DEFRA -Announcement 21 April 2009 (Environmental Secretary Hilary Benn) £10 million to fund initiative to identify main threats to bees and insect pollinator decline, including loss of habitat, and management strategies for limiting loss. This announcement is important in the context of omissions in environmental reports, and land concerned. Honey bees have not been covered in CS, nor included in any of the "body of evidence", e.g. Biodiversity audits, reports etc, as they are not yet recorded as endangered and on the list of National protected species, regardless of the dire situation of honey bee losses in UK, Europe, and the World, and National Government concern. CS will now need to consider this. CS 7.52 says Biodiversity ensures our survival. N.B. European Directive on Strategic Environmental Assessment (SEA). Related to this, the native black honey bee (in Britain since the Ice Age) is also omitted but may be a candidate for protected species listing. It is wild and not domesticated despite now being hived. There appears to be no information relating to this site from an environmental or biodiversity point of view. Honey bees are also not included in the AGRICULTURAL surveyor rural economy as part of the body of evidence of the CS. Ref to Bee Improvement and Bee Breeders Association (BIBBA). Apiaries adjoining the land-e.g. SITE A, can range from 2-20 small nucleus 'rearing' boxes to full hives -an average colony in summer has worker (pollinating) bees 50,000 -a typical summer month 6x50,000=300,000 bees pollinating hedgerows, trees, plants, local fruit crops etc. (There is a possibility of Community Orchards in this "semi-rural area" .) A housing estate a few yards away could, on safety issues (i.e. swarms/ collection, hive vandalism and poisoning) be destroyed, or force removal to an inappropriate site resulting in their demise. The bees have been sited there for 50 years. Site B, hives a few yards away from proposed development may also have similar problems. 6-12 beekeepers would be affected by this development. (12 apiaries average 6 hives, x 50,000 bees each amounts to huge pollinating force). Honey bees are now proven native to Britain, although importation of other 'strains' increases the 'pollinator force' for crop pollination contracts etc, food and wax production. EU Black honey bee project is taking genetic material from Black honey bees, the British native species.

Officer Recommendation No change

Cromwell Lane

Representor number **REP-1143**

Representor : **AP Martin**

Representation number: **2166** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission

...cont

Morphometry for bees associated with this site shows them to be within parameters of Apis Mellifera Mellifera, our native Black Bee. The countryside of Arden has a "network "of dozens of apiaries and this alone (drone zone/mating zones over the fields in question) is vital in the survival of this strain. These bees can be traced back-4 generations, surviving on this site within the (non imported bees) network. The ancient hedgerows, woodlands (Parkwood) are major nectar sources-native plants. Whilst honey bees do well in urban areas, and can be moved to crops, heather etc, this is not relevant in context of maintaining continuity being sited in an appropriate drone congregation zones.Drone flying zones can be seen over this field.

With both Solitary bees and honey bees pollination, there is some overlap of flowers visited, but the sheer force of numbers in honey bees plays a significant role in production of berries, seeds etc of wild plants, as well as fruits. They are a key player in the biodiversity of the area. A 3 mile (+) average flying radius from the hive, ensures they play a role in pollination e.g. (Parkwood, Tile Hill woods), thus affecting mammals and birds. Analysis of pollen in honey testifies foraging range, and sheer number of native tree/plant types visited. The evidence of interaction between woodland surrounded by urban development, and the rural/semi rural community, where hives are cited needs consideration. Removal of hives within in flying distance of such sites, for safety reasons, may impact on pollination-therefore birds, mammals etc Environmental awareness of this interaction between semi-rural ways of life and preservation of related inner urban landscape woodland is not

practically acknowledged, in CS. LDF EQ5 says "biodiversity will be promoted as a core component", p51. An adding and taking away policy (CS LDF Sustainability Appraisal EQ2 refers to "adding and taking" away) is not viable with particular environments-Ancient Arden and its components. Green spaces, playing field land is different, but landscape/land area with rich diversity and particular features such as that described should not be preserved.

Consideration needs to be given to "semi-rural" ways of life, including local food production, (not just honey) , particularly with the future in mind. The policy of use of terms-either rural or urban, needs closer analysis. To allocate an area to become urban i.e. with dense housing because it is "semi -rural" i.e. existence of some housing, is not a justification for quick fix urbanisation, resulting in immense destruction of the environment .

Rural/environmental protection can take place without housing estate swamping, which is destructive, density not being relevant. Environmental impact is not being acknowledged in practical terms despite stated support by Ccc. It does not mutually exclude social and economic factors.

Replanting appropriate (Native or non native) nectar bearing plants (if in reality it takes place, following conditions of planning) is not a solution for replacing main nectar sources, i.e, trees. It takes too long to be established for forage (pollen & nectar). In some cases Councils seem unable to source correctly, e.g, the loss of apprx 12 good nectar yielding lime trees, and other mature trees in this area has already impacted on these

honey bees and survival. Additionally, planting of trees-e.g. limes of different type which are poisonous nectar sources is damaging too. Replanting of Native species which are nectar bearing has been proven to be difficult, and replacement of diversity of (plants alone), is impossible.

Officer Recommendation

No change

Cromwell Lane

Representor number **REP-1143**

Representor : **AP Martin**

Representation number: **2167** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

...cont

AMENITY (6.58 SG 12 Residential Density) As we have a valuable 'resource' in the region-the Westwood heath in Arden Countryside, which cannot be recreated elsewhere, and it is linked to ways of life, (quality) and to various communities within the area. The land represents an isolated field in the 'ring' around Coventry. Why therefore, destroy this area by breaking into the Green Belt-the loss cannot be recreated. With omissions in the body of evidence, lack of consultation with local people and time scale allowed the total sum of characteristics of this land/field has been overlooked.

HERITAGE (7.13 and EQ1)The site is historically interesting in its relationship with old Coventry and Kenilworth. The discovery of a Bronze Age Axe at rear of Cromwell Lane, and an Archeological Dig in the region acknowledged by Planners, plus 5 Listed buildings for which ENGLISH HERITAGE has funded research into technical analysis, 2 of which are to be engulfed within a modern housing estate is destructive, 2 others bordering. (Duggins has 5th listed building with related historic buildings. There are others in the locality. All

these buildings featured in English Heritage's Images of England PROJECT. Heritage and Environment are important for those in region, and outside. (Duggins L Listed building would be engulfed, and this small piece of land next to a fast flowing stream, has a great diversity of wild life-it also floods its banks onto the building land concerned.

QUALITY OF LIFE This distinctive countryside, surrounding Coventry, with views from the high points of "the heath", is important for both those living close by or, commuting to employers in the area-Warwick University, and attracting people to the area. It enhances a distinct sense of place. There is historic interest for schools and children, and older people and disabled who can't travel far, benefit from this place. Additionally, it is of

interest to the many overseas visitors at WU. It adds to the "Quality of Life", as described in a Warwickshire. County Council study which relates "Warwickshire landscape" albeit managed by a neighbouring city. RIGHTS The 2 Rights of Way are special rural walks, one along the stream and the hedgerows of the field concerned, where there is a wide variety of wildlife and birds (Larks, Pippets, Warblers),many bats J hedgehogs, moles, field mice, dormice, harvest mice, range of solitary bees. GCNewts in ponds in the area

were officially identified, and Westwood pond(?) to be entirely engulfed. The walks are away from the increasing traffic, including an historically older walk way at the backs (once the fronts) of the Listed buildings prior to present Cromwell Lane. The Stone House, (later Cromwell Cottage) maps 1740, 1660 show these. British Rail have built a footpath bridge over the railway enabling one rural walk to link into other ancient Arden walks (around Meriden Gap). Ancient hedgerows line footpaths-e.g. Parkwood Lane leading to an ancient walkways with the woods. These are linked not isolated amenities. Dr Mike Christie for Ramblers

Association produced report on economic and social value of walking. The footpaths on this site and close by enable local rural walking, without driving to distant destinations. The Council might consider identification and enhancing assets rather than attempts to replace/recreate such features.

Officer Recommendation

No change

Cromwell Lane

Representor number **REP-1143**

Representor : **AP Martin**

Representation number: **2291** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

ACCESS There is no access to the land. Bordered by railway line / Bellways brown field development, and this has little area for no more than one road between Grade 2 Listed building and rail flyover. Bellways 140, +390

houses=530-circa1060 CARS dangerously exiting the end of the bridge, plus 50 from Duggins proposal. 3rd boundary is historic Arden Belt behind Nailcote Hall up to Berkswell. The 4th are our own properties.

AVAILABLE LAND-Calculation of land available for actually building is questionable for Cromwell L. The CS map/plan obscures present properties on west side Cromwell L, including Listed buildings and Westwood farm complex/pond, drives -and equally on the main plan, unmatched colouring under which are our properties confirmed now by CCC as "erroneous". Therefore the total area has been over stated, together with extensive network of sterilisation easements. Assessment of Land is not covered for this area by body of evidence. " Sand plugs" , see Tithe Maps 1840 and "Sand on heath" etc, may limit building area or raise costs. NB Evidence of deep foundations for bungalows on this land area. Is this suitable building land? Flooding on the Duggins L over 51 years.

"ENERGY CROSS ROADS" A/ National BPA High Pressure Fuel pipeline, oil pipeline, with legalities-sterilisation metre easements, roads can't follow pipeline's direction, verges/pavements/footpaths can't go over it, services restrictions. B/ 1966/7 High Voltage regional cable across middle-unducted. High cost excavation required to duct even if under roads and paths. Easements-and restrictions on building, roads.paths, people

etc C/ 1989/90's High voltage unducted cable horizontally across field, further easements and restrictions on building, roads, paths, people. D/ Pylons and related junction cabling at North end. The above energy pipelines converge on this field, and with sterilisation easements should reduce number of houses, at proposed density.

If the units are thereby reduced, what is the justification for obvious resulting destruction? If the unit numbers stay the same, density increases and height of buildings would result in damage to landscape, which is in itself an asset.

FAILURE TO CONSULT local people and a short consultation period, over 2 Bank holidays given accessibility to Council offices, libraries has limited alternative, positive suggestions. No mention was made of release of CS about to be released days later, at Westwood Area Forum Meeting 11/3/09 where local people affected attended. Coventry City Council say the meetings" includes people who care about their neighbourhoods", attended by " ..local councillors, council staff, community...and most importantly local people" CCC Agenda 11/3/09

PROPOSAL We propose gentle "absorption" both in time scale and policy, as follows. Whilst this is more difficult for developers and planners, this is a way forward to safeguard the special features of this site. In 1960's the housing, bordering the proposed development, including the War Depot/brown fields site, and land

bordering CROMWELL lane was NOT in the Green Belt. Subsequently it was incorporated into the Green Belt but at a previous review Coventry City Council had recommended that it be removed. We would suggest that this earlier proposal, taking the strip of partially built on land be removed. This would create suitable development albeit limited but could start earlier, and enable sympathetic infill, reflecting the redbrick and styles of the area, whilst protecting hedges and sites above described. Any buildings could tie in with recent

Planning approved styles, at the northern end of the Lane, which was supported by local people.

Officer Recommendation

No change

Cromwell Lane

Representor number **REP-1146**

Representor : **Mr R and Dr P Little**

Representation number: **2212** Representation in regard to : **3.4**

Verbatim Submission

We write to voice our concerns with regard to proposed plans outlined within the Regional Spatial Strategy Phase Two Revision and the Nathaniel Lichfield and Partners Study to increase new housing within Coventry and Warwickshire over the next 25 years, particularly with regard to the plans to develop the Green Belt currently separating Coventry from Kenilworth. The targets set within the above strategies appear unrealistic and inappropriate given the current economical climate especially given the poor employment prospects within the area and the limited facilities for education and medical support for such expansion Development of the Green Belt will have significant implications for the environment and would seem to conflict with the Prime Ministers policy on protection of the Green Belt.
We urge careful and full consideration of the above issues raised

Officer Recommendation No change

Representation number: **2213** Representation in regard to : **6.28**

Verbatim Submission

We write to voice our concerns with regard to proposed plans outlined within the Regional Spatial Strategy Phase Two Revision and the Nathaniel Lichfield and Partners Study to increase new housing within Coventry and Warwickshire over the next 25 years, particularly with regard to the plans to develop the Green Belt currently separating Coventry from Kenilworth. The targets set within the above strategies appear unrealistic and inappropriate given the current economical climate especially given the poor employment prospects within the area and the limited facilities for education and medical support for such expansion Development of the Green Belt will have significant implications for the environment and would seem to conflict with the Prime Ministers policy on protection of the Green Belt.
We urge careful and full consideration of the above issues raised

Officer Recommendation No change

Cromwell Lane & Duggins Lane

Representor number **REP-1061**

Representor : **Philip Maud**

Company: **Nailcote and Conway Residents Association**

Representation number: **1934** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

The following email was received from Cllr. Skinner regarding the alleged consultation performed by CCC Core Strategy impacting the change of Green belt designation to Brown field status. Our residents association (Nailcote & Conway Residents Association) which is well known to the planning office and planning directorate as well as many individual residents who live in close proximity to Cromwell Lane and Duggins Lane were are generally unaware of this proposal This begs the serious question as to why residents who live in these areas have not been consulted directly by the CCC and why the residents association has not been contacted for their opinions as part of this consultation.

If the planning authority is serious about Consultation it should be about 'direct' active engagement of those who live in the communities affected, not just 'lip service' by proxy via the media. We would be interested to know when these consultation notices and radio interviews took place.

The Nailcote & Conway Residents Association wish to register their objection to the loss of Green Belt status, the main reason being that the Govmt. policy is mis-guided and particularly with:Cromwell Lane and Duggins Lane. The strategy is not leaving any Green belt buffer space between the Solihull and Coventry boundaries which will be a disaster for both the human populace and wildlife, particularly if Solihull chose to do the same.

Officer Recommendation No change

Duggins Lane North

Representor number **REP-1114**

Representor : **Mr Clive Benfield**

Company: **KB Benfield Group Holdings Limited**

Agent Details Company: **Martyn Bramich Associates**

Contact: Mr Neal Kennedy

Representation number: **2088** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

The land subject of this objection adjoins the Samuel Smith's Charity site on Duggins Lane Tile Hill. The site owned by Samuel Smith is allocated as safeguarded land for future housing requirements. Our clients land is allocated as Green Belt yet it has the same benefits in terms of its proximity to the main urban area. The site also is adjacent to Tile Hill Railway Station. The site is therefore in a sustainable and suitable location for future housing development. The site also has clear defensible boundaries formed by roads and adjoining development which ensure that the allocation of the land will not compromise Green Belt policy.

Our clients land should be treated the same as the adjoining Samuel Smiths Charity site and allocated as safeguarded land to meet future housing requirements. The site is adjoined by roads to the front and side. Existing development is located to the other side boundary and the Samuel Smith site runs along the rear boundary of the site. The site has clear defensible boundaries that enable its removal from the Green Belt without harming the interests of the Green Belt as a whole.

The site would be better represented as an area of safeguarded land under policy SG 6 Location and Scale of Housing Development as a site to meet future housing requirements. The Inspector may require further clarification of the issues surrounding the site.

Officer Recommendation No change.

Dunlop

Representor number **REP-1046**

Representor : **Maggitt PLC**

Company: **Meggitt PLC**

Agent Details Company: **King Sturge LLP**

Contact: Ms Elle Cass

Representation number: **1878** Representation in regard to : **Policy SG 17: Mixed use redevelopment of employment land**

Verbatim Submission

Other than strategic sites, redevelopment of existing employment sites to a mix of uses will require the applicant to demonstrate that an element of other use or uses of the land is necessary in order that the redevelopment as a whole is viable. In the event that employment sites come forward for redevelopment normally no more than 20% of the site area shall be for residential use. Planning Obligations will require the jobs to remain within the Coventry Travel To Work Area (TTWA). Again Policy SG17 does not deal with strategic sites.

Officer Recommendation No change

Representation number: **1881** Representation in regard to : **Proposals Map**

Verbatim Submission

The November 2008 Core Strategy identified 16 Strategic Employment Sites across Coventry and provided no detailed policy on the protection afforded these or other identified sites. There was no indication within this document that there was an intention to identify further Strategic Employment Sites and no specific consultation exercise has been undertaken on this issue, nor have our clients' been notified of the intention to identify their site.

The inclusion of our clients' site at this late stage is therefore considered to be contrary to the provisions relating to the 'sound' preparation of Development Plan Documents. We consider that your Authority have failed to follow the principles/requirements for frontloading as detailed in PPS12 and the companion guide 'Creating local Development Frameworks.

This stage of the Core Strategy plan making process represents the last opportunity for consultation prior to the Examination in Public later in 2009. Given the late stage in the consultation process we consider that it is unsound to now identify a further 42 sites as 'Strategic Employment Allocation Sites (SEA)' with no proper consultation on these revisions.

Having considered/reviewed the early consultation exercise responses we note that there have been no requests for these sites to be identified and this essentially represents an allocation exercise without due consideration. If this approach is carried forward to the Examination the Plan should be found to be unsound.

On this basis we object to the following paragraphs and policies, as well as Map 5 and the Proposals Map.

Officer Recommendation No change. Site was identified in emerging core strategy.

Representation number: **1882** Representation in regard to : **MAP 5 Strategic Employment Allocations**

Verbatim Submission

The November 2008 Core Strategy identified 16 Strategic Employment Sites across Coventry and provided no detailed policy on the protection afforded these or other identified sites. There was no indication within this document that there was an intention to identify further Strategic Employment Sites and no specific consultation exercise has been undertaken on this issue, nor have our clients' been notified of the intention to identify their site.

The inclusion of our clients' site at this late stage is therefore considered to be contrary to the provisions relating to the 'sound' preparation of Development Plan Documents. We consider that your Authority have failed to follow the principles/requirements for frontloading as detailed in PPS12 and the companion guide 'Creating local Development Frameworks.

This stage of the Core Strategy plan making process represents the last opportunity for consultation prior to the Examination in Public later in 2009. Given the late stage in the consultation process we consider that it is unsound to now identify a further 42 sites as 'Strategic Employment Allocation Sites (SEA)' with no proper consultation on these revisions.

Having considered/reviewed the early consultation exercise responses we note that there have been no requests for these sites to be identified and this essentially represents an allocation exercise without due consideration. If this approach is carried forward to the Examination the Plan should be found to be unsound.

On this basis we object to the following paragraphs and policies, as well as Map 5 and the Proposals Map.

Officer Recommendation No change

Dunlop

Representor number **REP-1046**

Representor : **Maggitt PLC**

Company: **Meggitt PLC**

Agent Details Company: **King Sturge LLP**

Contact: Ms Elle Cass

Representation number: **1883** Representation in regard to : **5.11**

Verbatim Submission

Paragraph 5.11 essentially precludes redevelopment of the SEA sites. Previously our clients' site could have been considered under the provisions for other facilities where it is recognised some mixed use development might be needed to stimulate redevelopment. This redesignation therefore represents a significant policy shift.

Officer Recommendation No change.

Representation number: **1884** Representation in regard to : **6.63**

Verbatim Submission

Paragraph 6.63 recognises the shifting employment structure of the City. However, the policy shift in the Core Strategy Proposed Submission Document will have the effect of mothballing sites such as our clients; which would require a mixed use development in order to achieve a viable redevelopment. It will therefore not lead to qualitative improvement in employment offers.

Officer Recommendation No change

Representation number: **1885** Representation in regard to : **6.72**

Verbatim Submission

It is not intended that land will be allocated or safeguarded by the Core Strategy to meet the entire indicative longer term requirement for employment land to 2026. This is to avoid large areas of allocated or safeguarded land remaining undeveloped for substantial periods. Policies will allocate sufficient land to meet the City's 'minimum reservoir', and monitor the take up of readily available sites. As 'minimum reservoir' sites are developed, it may be necessary to allocate and/or safeguard additional land to maintain the reservoir of readily available sites in the City or to request to tile districts of Rugby, Nuneion and Bedworth and/or Warwick to consider making further provision on the edge of Coventry in their Core Strategies. Paragraph 6.72 appears to recognise that safeguarding large areas of land can mean that they remain undeveloped, however the updated policy and significantly expanded level of allocations does not reflect this. We consider that pursuing this strategy, at least in the case of our clients' site, will mean that the site remains in its current outdated state, with any potential for a qualitative improvement being lost.

Officer Recommendation No change

Representation number: **1886** Representation in regard to : **6.76**

Verbatim Submission

Strategic sites are those employing 50 or more, are required to be retained in employment use for the overall growth strategy of Coventry to succeed. The strategic sites are shown on Map 5 below:

Paragraph 6.76 defines strategic employment uses as those employing over 50 people. There is however no justification for why employing 50 or more people makes the sites strategically significant. Further, does this mean that where a site closes and no longer meets this criteria that the site is no longer strategic. This definition was not included in previous drafts and therefore we would again question the soundness of this new addition. In relation to our clients' site, due to operational requirements they are seeking to relocate their operation into a reduced area and relet surplus areas. Would employees from different firms be counted together in this case? If this is the case, a site might end up with a multitude of small employers and vacant units, but still qualify as strategic, leading to the site being protected with a poor level of site usage etc.

Officer Recommendation No change.

Dunlop

Representor number **REP-1046**

Representor : **Maggitt PLC**

Agent Details Company: **King Sturge LLP**

Company: **Meggitt PLC**

Contact: Ms Elle Cass

Representation number: **1887** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

In order to maintain a balanced local economy, maximise employment opportunities and skill levels, and ensure that businesses have a range and choice of sites and premises, the Core Strategy:

- Allocates land for employment and mixed use development; and
- Focuses office, retail and leisure employment generating developments within the City Centre to provide 50% of new jobs in Coventry; and
- Supports the expansion of University of Warwick, Coventry University and University Hospital Walsgrave to provide 30% of new jobs in Coventry; and
- Maintains an 82 hectare 'minimum reservoir' of sites; and
- Protects strategic employment sites from redevelopment to other uses; and
- Directs large scale warehousing development to Regional Logistics Sites, in order that efficient use is made of employment land within the City.

Policy SG14 now provides a policy presumption against redevelopment of the SEA sites. This was not specifically identified previously and coupled with the significant increase in the number of proposed protected SEA sites, this change should require further consultation or preferably should be deleted from the Document. Paragraph 6.63 Coventry's economic base has been shifting away from manufacturing (55% of jobs in the early 1970s, now 14%) and towards services and distribution. This trend has driven changing needs for employment land and premises. The City has already experienced considerable recycling of large former factories, notably car plants, and some of these have continued in employment use whilst others have been released in whole or part for housing. The City's employment base now has a strong reliance on local government, the university hospital and the two universities. However, new employment resulting from new technology offers an opportunity to increase and diversify the City's economic base in the future. A balanced, mixed economy will require the retention and expansion of a range and choice of sites and premises.

Officer Recommendation No change.

Representation number: **1888** Representation in regard to : **Policy SG 16 : Protection of best quality Employment land**

Verbatim Submission

With the exception of the Mixed Use Allocations set out in Table 4 and Strategic sites, as shown on the Proposals Map, and headquarters, proposals for redevelopment to other uses of other employment sites will be assessed using the criteria enshrined in RSS Policy PA68. The loss of entire strategic sites or headquarters to other uses will not be permitted. In the event that a headquarters operation closes, or the business is subject to a takeover or amalgamation, the site will not be permitted to transfer to non employment (B1/B2/B8) use or uses.

Officer Recommendation minor change remove the word "entire" from the policy SG16.

Eastern Green

Representor number **REP-1062**

Representor : **Mr V Spencer**

Company: **Allesley/Eastern Green Residents Association**

Representation number: **1935** Representation in regard to : **Proposals Map**

Verbatim Submission

Support the retention of the Eastern Green site in Green Belt in accordance with the joint green belt studies findings. We, the residents of Allesley/Eastern Green Residents Association believe the Council have carried out their duties with respect to the Core Strategy in a professional manner. Furthermore, we believe this to be legally compliant.

Following on from our presentation to the planning office in January 08, our re-submission to the Emerging Core Strategy and subsequent meetings and discussions, we wish to state, we are appreciative of the City Council taking on board the issues raised by the residents of the Allesley/Eastern Green, That is, confirming the area for search originally identified in the Core Strategy is now established as green belt and therefore will not be subject to further developments within the foreseeable future.

Officer Recommendation Support welcomed.

Eastern Green/Keresley

Representor number **REP-1043**

Representor : **Parkridge**

Agent Details Company: **Holmes-Antill**

Company: **Parkridge**

Contact: Liz Banks

Representation number: **1870** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

The Core Strategy is not sound. Its evidence base is neither robust nor credible, such that the plan will not be effective. It will not be deliverable or flexible.

1. Coventry is identified as a New Growth Point where large scale and sustainable growth will be pursued. The City can contribute to widespread economic growth and prosperity, with an emphasis on transforming the quality of the City as a place to live, work and visit. The challenge to the City Council is how to capture the benefits of growth within the constraints which exist. The Core Strategy rightly puts the emphasis on quality of job offers and in the range of housing to be provided. This manifests itself in a Sustainability Strategy which identifies the importance of Green Spaces, Public Transport and a full range of housing types, tenures and locations.

2. As a sub-regional imperative, the principle of concentration on the northsouth corridor is correctly endorsed in the Core Strategy with an enlarged City Centre as the focus of a wide hinterland, but to which good, speedy access is essential.

3. The SHLAA estimates that 22,800 dwellings can be accommodated within the City outside the Green Belt, which leaves a shortfall from the RSS requirement of 10,700 dwellings. The SHLAA estimate is optimistic. For example, it predicts 1,730 dwellings at Peugeot/Stoke and 950 dwellings at Paragon Park. In both instances, these totals have relied on the delivery of a large number of flats but we now know that the dwelling production at Peugeot Stoke is likely to be less than 1400 and at Paragon Park it will be only 650, as flats are replaced by family houses. This represents a 23% reduction on the sites, but a 24% reduction in the SHLAA estimate, for these sites alone. The same issues will apply to other identified sites and if the Peugeot and Paragon reductions were repeated, then the impact across the City would be a reduction in estimated capacity from 22,800 to 17,328 resulting in a shortfall increase from 10,700 to 16,172.

4. Part of the answer is to release land from the Green Belt, which the Core Strategy does propose at Keresley and which we wholeheartedly support. This release is based on the findings of two studies examining the potential for new development in the Green Belt.

Firstly the Coventry Green Belt Review of December 2007 provided an evidence base for the emerging Core Strategy which identified two "areas of search": Keresley and Eastern Green.

With regard to Eastern Green, the Review said:

"The LDF Core Strategy Options report identifies a search area to the north of the Eastern Green built-up area. This assessment looks at the broader area from Eastern Green housing area to the A45 (the main road passing through the area) and bounded in the east by Park Hill housing area and to the west by Pickford Green Lane - an area known as Slipperslide Valley. This is mainly an area of sloping farmland with a golf course at the north-eastern end. It comprises two stream valleys with the eastward flowing streams joining to form Pickford Brook just before the Park Hill estate is reached. The resulting landform means that there is a broad plateau to the immediate north of Eastern Green which then slopes down to the first of the two streams. High voltage overhead power cables cross the north-western section of the area". (para 4.2.1) For completeness, the area assessed also includes the Green Belt land to the west of Pickford Green Lane south of the A45 up to the boundary

with Solihull. This area is rolling farmland with some farms and other residential buildings at Pickford Grange, plus the various industrial and office buildings between the A45 and Meriden Road". (para 4.2.2)

Officer Recommendation

No change.

Eastern Green/Keresley

Representor number **REP-1043**

Representor : **Parkridge**

Company: **Parkridge**

Agent Details Company: **Holmes-Antill**

Contact: Liz Banks

Representation number: **1871** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

....cont

"In assessing potential urban sprawl, the strategic views of the land between Eastern Green and the A45 are looking south!southeast! south-west from the A45, and also looking east from the open countryside around Millison's Wood area. A substantial part of the plateau north of Eastern Green is effectively hidden from these views by the landform, although the further north across the valley the more intrusive would development become. If careful boundaries were drawn to the plateau area the visual impact of its development from the north and west would be relatively minimal. However, by extending beyond the indicative line northward on Map 3 the impact becomes progressively greater to the extent that it would give the appearance of significantly reducing the Meriden Gap". (para 4.2.3)

"This area contains no views of the City Centre or other nearby historic towns". (para 4.2.4)

"Development of the area identified would not damage a green wedge or a designated nature conservation area. In fact the green wedge which was created with the development of the Park Hill housing area could be extended westwards as part of the development and the highly attractive stream, trees and fields should be protected and enhanced. In accordance with para . 2.19, an integral aspect of enabling growth in this vicinity should be the enhancement of the remaining Green Belt area in that vicinity through compensatory investment. Such enhancements would clearly need to have regard to the Ancient Arden Design Guidelines". (para.4.2.5)

"Map 3 shows the extent of floodplain within this area of land, relating directly to the two streams. The impact of development on this floodplain will need to be assessed in detail, and particularly in regard to changing the character of the valley environment and the extension of the green wedge". (para 4.2.6)

"The potential development area identified should be capable of being integrated with existing areas at Eastern Green and Park Hill via pedestrian and cycle links. Road access will be an issue requiring investigation of the potential to relieve congestion in the Eastern Green/Tile Hill areas by the provision of a new road from the A45. Education, social and community facilities will need to be assessed in relation to what is already present with the need to provide additional facilities identified as an integral part of any development brief". (para 4.2.7) "In looking at the area to the west of Pickford Green Lane it is apparent that any built development here would be isolated from the city's built-up area and would represent a significant visual intrusion into the sensitive Meriden Gap. As such it would not

meet the Green Belt criteria relating to urban sprawl, reducing important gaps between urban areas and encroachment of the countryside". (para.4.2.8)

5. Land at Eastern Green was identified as a 'Potential Development Area' as shown on Map 3 (above) from the review documentation.

6. Secondly a Coventry Joint Green Belt Review (or Study as it is alternatively referred to) was subsequently commissioned in 2008. This Review (Study) similarly recommended the release of land at Keresley from the Green Belt.

But at Eastern Green, a potential development was rejected because of its potential impact on the "Meriden Gap".

The 'Meriden Gap' is rather mythical. It doesn't seem to be defined anywhere; certainly not on the Proposals Map or in the Joint Green Belt Review/Study, even though it is the sole reason for the rejection of the prospect of development at Eastern Green, and this, in spite of Eastern Green having "a low landscape value [which] has been significantly degraded and makes a less valuable contribution to the Green Belt than other sites".

Officer Recommendation

No change

Eastern Green/Keresley

Representor number **REP-1043**

Representor : **Parkridge**

Company: **Parkridge**

Agent Details Company: **Holmes-Antill**

Contact: Liz Banks

Representation number: **1872** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

...cont

7. The SSR Coventry Joint Green Belt Review, we believe, is seriously flawed with regard to its consideration of the Eastern Green area. We make this comment on the following basis:

- The report finds that the site "... has been significantly degraded and might be considered for removal from the Green Belt. We recommend further detailed study".

- The site has a "low landscape value" where "These parcels are considered to make a less valuable contribution to the Green Belt in comparison to other parcels. Further studies should be undertaken to examine whether there are opportunities for urban expansion in these areas".

- The illustrations in the Appendices to the report (photomontage sheet 2) explain that the area "...has been degraded by urban fringe land use. There are (sic) a variety of historical landscape features in the locality - but a detailed study may reveal opportunities for future development". There are no constraints to development on the site, save one public footpath which can be protected and a small area of land liable to flood which can be avoided, managed and enhanced.

- The site is connected to the urban area.

8. On the scoring system applied to sites in the report, Eastern Green would score 4.5, better than any other site in Coventry. This confirms that the emerging Core Strategy has been pursuing the correct policy and that the Coventry Green Belt Review of December 2007 was correct in its conclusions.

9. However in the SSR report, the site was not taken forward for the "further detailed study" as recommended in the initial assessment of sites. This may "simply" be an oversight because at Table 3 on page 38 of the final report, it notes that 48 "parcels" are "taken forward" for further analysis, although in the relevant schedule in Appendix 12, only 47 sites are recorded. There is clearly confusion which seriously undermines the validity of the report.

10. Notwithstanding these specific concerns, the Eastern Green site is reported by the consultants (SSR) to fail the five purposes of Green Belt set by PPG2. We take fundamental issue with the assessment of Eastern Green in this regard, notably that it: "Contributes to preserving the setting and character of the Meriden Gap".

There are four points:

1. PPG2 seeks "To preserve the setting and special character of historic towns" which this site does not do, and

2. The function of preserving the setting or character of the Meriden Gap is one of landscape and the proposal' analysis of the landscape at Eastern Green, carried out by sub-consultants to SSR, shows it to have low value.

3. If impact on the Meriden Gap had been an insurmountable issue, then the City Council would not have consistently shown Eastern Green as an area of search for development in its emerging Core Strategy.

IV. The Coventry Green Belt Review of December 2007 concluded that land at Eastern Green could be developed without harm.

11. In this regard a masterplanning exercise at Eastern Green has demonstrated how up to 3,000 dwellings could be provided in conjunction with a mixed use local centre, primary school, parkland and other green infrastructure, in addition to highway improvements and public transport routes and linkages including a new Park and Ride facility. Even if further assessment were to reduce this figure to about 1,750 dwellings, sustainable urban extensions at Keresley and Eastern Green should be encouraged to help deliver the housing numbers required as part of wider mixed use developments.

Officer Recommendation

No change

Eastern Green/Keresley

Representor number **REP-1043**

Representor : **Parkridge**

Company: **Parkridge**

Agent Details Company: **Holmes-Antill**

Contact: Liz Banks

Representation number: **2308** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

12. The response given by the Council to our criticisms of the SSR Study was:

"The Joint Green Belt Study analysed all parcels across the study area against the fine (sic) principles of green belt in national guidance. The study concluded that assumed (sic) against the criteria the land should be retained in the green belt".

This statement is not true. There is no evidence of analysis or assessment. The site was rejected summarily because it "contributes to preserving the setting and character of the Meriden Gap".

This is not one of the five principles of Green Belt. Neither is the Meriden Gap identified, defined or justified in the Core Strategy.

13. Consequently, the evidence base of the Core Strategy is flawed; it is neither robust or credible. It is, in fact, contradictory.

14. The Core Strategy has over-estimated the capacity of sites within the City; potentially by a very considerable margin. The assessments must be revised, a new dwelling shortfall identified and a more appropriate recognition given of the need to release land from the Green Belt both within and adjoining the City's administrative area.

15. In addition, the Core Strategy should recognise the importance of a ready supply of new land for housing in being able to deliver a broad mix of type, tenure and quality. In this regard, to delay the release of 'new' sites until some future date when 'existing' sites have been developed will undermine the overall regeneration of the City by redirecting investment - not from Green Belt sites to urban sites, but from Coventry to, for example, Warwick or Solihull. This will not serve the City well and, consequently, the approach

to the release of land (from the Green Belt) for housing should be encouraged in order to assist in the delivery of innovative, high quality schemes which can contribute significantly to the "step-change" in the 'image' and perception of the City to the outside world and thereby assist in its economic advancement.

16. The Core Strategy's Sustainability Strategy emphasises the key components which are essential to the efforts to transform the City; these are:

- quality of job offers
- public transport
- a range of housing types
- green spaces.

These cannot be delivered on previously developed land alone; there must be an understanding that all types of land will be brought forward, to serve different objectives and different (housing) markets.

Consequently, the phasing of land release in policies SG6 and SGB needs to be revised to facilitate a more 'even' approach to delivery of the Core Strategy's objectives.

Officer Recommendation

No change

Keresley

Representor number **REP-1014**

Representor : **JGGray**

Company: **JG Gray LTD**

Agent Details Company: **Stoneleigh Planning Partnership**

Contact: Mr R Dunnett

Representation number: **1777** Representation in regard to : **5.6**

Verbatim Submission

Para 5.6 states that priority will be given to the development of previously developed land. Whilst provision is to be made for the release of greenfield sites, these will only come forward when the supply of land is below 5 years. Whilst, in principle, we would agree with this strategy, we are concerned that it may;

i) not deliver the most sustainable form of development.

ii) mean that the City Council does not have sufficient flexibility to respond to any shortages of housing land supply which might emerge. The Core Strategy, in line with national planning guidance, is seeking to ensure that future development in the City is sustainable. However, the previously developed sites will not necessarily be the most sustainable as they may be poorly related to services and facilities and may, by their nature, be difficult and more expensive to be made sustainable. Conversely, some greenfield and Green Belt sites are very sustainable. We are, therefore, of the view that the Spatial Strategy should treat sites individually and allow their release on a sequential basis in order to maximise sustainability. In principle, a sequential approach requires the 'consideration' of previously developed sites within the urban area as a first priority, followed by Greenfield sites within the urban area and then greenfield sites adjacent to the urban area. This 'consideration' may conclude that a site higher up the sequential order is less sustainable due to reasons of accessibility, transport links etc. It may, therefore, be more sustainable to release a lower order site. For this reason, application of the sequential test should be on a site by site basis. We will demonstrate later in this representation that our client's site is, indeed, highly sustainable and that it should therefore be released early in the plan period.

We are also concerned that the proposed spatial strategy would not give the City

Council sufficient flexibility to ensure a continuous five year supply of housing land across the City.

We particularly note, for example, that Table 2 shows that the strategic sites and City Centre sites taken together total 52% of the total housing land supply. A large number of houses (13,765) are tied up in a limited number of very large sites, raising the prospect of demolition, contamination, infrastructure provision, coordination etc causing implementation and, hence, housing land supply difficulties. We are also concerned that Coventry's housing need is proposed to be met by three local authorities.

Officer Recommendation No change.

Representation number: **1778** Representation in regard to : **5.12**

Verbatim Submission

Para 5.12 identifies the need to accommodate 10,700 dwellings in Green Belt releases, but that only 3,750 are proposed to be allocated within the City. As proposed, 7,000 plots would need to be found from Green Belt releases in Warwick District and Nuneaton and Bedworth Borough to serve Coventry's needs. The Core Strategy states that this is in line with the Sub-Regional Strategy agreed by the Coventry Solihull Warwickshire Forum (CSWF). No evidence is provided of this agreement and we understand that these figures have not, in fact, been agreed. Coventry's RSS housing requirement is for 33,500 dwellings, 2006 - 2026. We are concerned that if the supply is split between three authorities, there may be an attempt to split the requirement and the five years supply three ways also. We remain of the view that the City Council should remain in control of its own total housing requirement and that the five year supply must reflect the Coventry requirement of 33,500 dwellings 2006 - 2026. This has significant implications for the supply of housing land in the City. We support the comments made in para 5.19 that the best use will be made of existing network capacity by locating development close to existing infrastructure so as to reduce the need to travel by car. In line with this concept, we believe that there are Green Belt sites which would meet these objectives and should be brought forward earlier in the plan period than currently proposed. We note that our client's site at Penny Park Lane/Bennetts Road, Holbrooks could be such a candidate for early release. Para 5.21 refers to the existing hierarchy of local centres and how future development should strengthen the role of these centres. Development of our client's site would achieve just that as demonstrated by the attached Sustainability Plan and Schedule (see Appendices 3 and 4). Just as sustainable sites exist within Coventry City, we are concerned that Green Belt releases in Warwick and Nuneaton and Bedworth Districts may be less so, as they are likely to be further from the City Centre.

Officer Recommendation No change

Keresley

Representor number **REP-1014**

Representor : **JGGray**

Company: **JG Gray LTD**

Agent Details Company: **Stoneleigh Planning Partnership**

Contact: Mr R Dunnett

Representation number: **1780** Representation in regard to : **6.29**

Verbatim Submission

Section 6 of the Core Strategy sets out the manner in which sustainable growth would be delivered.

Policy SG1 'Development' sets out the criteria which development proposals will be expected to meet. We support those criteria.

Para 6.28 and 6.29 refer to the components of the proposed housing land supply 2006 - 2026.

We have already made known our concerns regarding;

1) The dependence on a limited number of strategic sites for over 50% of the supply.

2) The limited number of small, deliverable sites.

3) The limited Green Belt releases within the City and the implied large number of housing plots to be found from Green Belt releases required by Warwick and Nuneaton and Bedworth in, potentially, less sustainable locations than within the City boundaries.

In addition to these concerns, we note in Para 6.29 that the Green Belt sites will be subject to further investigation before release. This suggests that there is the possibility that some of these sites may be sifted out. The Core Strategy, however, gives the impression that they are;

1) required future housing sites if the City Housing Requirement 2006 - 2026 is to be met. and that

2) without these sites, the pressure on neighbouring districts would be greater still.

Are these sites appropriate or not? Where is the evidence to suggest that they need further investigation? We do not believe that this contradictory situation is acceptable and suggest that the last sentence to para 6.29 be removed.

Table 2 (pg 41) refers (at line 9) to the reuse of empty homes contributing 2,160 dwellings to the housing land supply 2006 - 2026. We have found nowhere in the

Core Strategy where this figure is explained or justified. No evidence would appear to be provided to support the figure. Without such evidence, we are concerned that this element of the housing land supply may not be forthcoming and, therefore, further greenfield releases may be required and should be provide for. We also note that the figures contained in Table 2 do not correspond with the figures contained in the City Council's SHLAA (November 2008).

Officer Recommendation No change

Representation number: **1781** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

Policy SG6 refers to the location and scale of Housing Development. We note that it is intended that monitoring will ensure that only when there is not a five year supply of housing land will safeguarded land be released. As stated earlier, it is essential that the five year supply relates to the Coventry Housing Requirement of 33,500 (2006 - 2026) and not the figure of 26,510 referred to in Table 2 (pg 41) i.e. 8,375 dwellings over 5 years and not 6,627 dwellings. We note that the 7,000 dwellings proposed to be provided on greenfield releases in Warwick District and Nuneaton and Bedworth Borough will, inevitably, be all or nearly all within the Green Belt. On ground of sustainability, it is essential that, when the overall supply of housing land dips below five years, the safeguarded sites brought forward first are those in Coventry City and that the Warwick District and Nuneaton and Bedworth Borough sites follow on later in sequence.

Officer Recommendation No change

Representation number: **1782** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

With reference to Policy SG7, we note that our client's land meets all these criteria from the outset without the need for additional infrastructure. There is no deficiency and a developer contribution via community Infrastructure levy and/or Planning Obligation is therefore, according to the policy, not needed. This confirms, in our view, that the site should be considered for development early in the life of the plan (see Appendices 3 and 4). Table 3 sets out the Allocated Housing Sites. We support the identification of Site 31 'Keresley Eco-Suburb' for 3,000 dwellings and support its notation on the Proposals Map.

Officer Recommendation No change

Keresley

Representor number **REP-1014**

Representor : **JGGray**

Company: **JG Gray LTD**

Agent Details Company: **Stoneleigh Planning Partnership**

Contact: Mr R Dunnett

Representation number: **1783** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

Policy SG8 again refers to phasing and the release of, firstly, previously developed land, followed by the safeguarded sites. Whilst we support the principle of this approach, as it is in line with National Planning Guidance (PPS1 and 3), we remain concerned as to how the five year land supply is to be expressed. It needs to relate to the Coventry Housing Requirement of 33,500 dwellings (2006 - 2026) and not to the proposed 'City only' supply of 26,510.

Officer Recommendation No change

Representation number: **1784** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

In respect of paras 6.38 - 6.40 and Policy SG9, we support the identification, location and scale of the proposed Keresley Eco-Suburb. Para 6.40 refers to the CLG Draft Planning Policy Statement for Eco-Towns (November 2008). In describing the locational principles, para 3.2 of this Statement sets out criteria which should be considered. These would be met by the Keresley Eco-Suburb. We note that the proposed Keresley Eco-Suburb is on the edge of a higher order centre (Coventry), is close to existing major employment sites (Pro-Logis Park, Whitmore Park) and the eco-suburb would help deliver not only 3,000 dwellings, but also a Country Park and various infrastructure improvements. In respect of transport, the Statement, at para 4.12, states that homes should be within 10 minutes walks of frequent public transport and neighbourhood services. Para 4.16 refers to the need to be within 800m of primary and junior schools. We note that our client's site benefits from all these requirements already, without the provision of further infrastructure.

Officer Recommendation No change

Representation number: **1785** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

Para 7.24 and Policy EQ2 in referring to 'safeguarded land', is confusing as it would appear to be in contradiction with Table 3 'Allocated Housing Sites'.
Table 3 and Map 3 both refer to Housing Allocations. Both show Keresley Eco-Suburb as one of those allocations, albeit under the subheading of 'safeguarded land'.
Para 7.24 and Policy EQ2 make it clear that these are not allocations, but merely land taken out of the Green Belt for consideration for possible longer term development needs. The headings to Table 3 and Map 3 need to be amended to draw this distinction between these two categories of site if the Council is to continue to pursue this policy.
However, the safeguarded sites should be allocated in our view, as long term housing sites subject to a phasing policy. This phasing policy could identify the following;
1st Phase
2nd Phase
3rd Phase
4th Phase
Phase current allocations greenfield sites in City not currently in Green Belt
Safeguarded sites in Coventry Safeguarded sites in Warwick and Nuneaton and Bedworth to serve Coventry's needs.

Officer Recommendation Minor change. Table 3 ammend 4th title to read "reserved land"

Representation number: **1786** Representation in regard to : **8.6**

Verbatim Submission

Section 8 of the Core Strategy refers to creating an Accessible City. Para 8.6 sets out the intended approach, the intention being to locate development alongside existing transport networks and infrastructure as a first priority, with sites requiring new infrastructure as a second priority (paras 8.7 and 8.8). Our client's site would meet this approach from the outset without the need for any additional infrastructure provision. In respect of the Keresley Eco-Suburb, our client's site would be a first priority site and much of the remainder, a second priority.

Officer Recommendation No change

Keresley

Representor number **REP-1014**

Representor : **JGGray**

Company: **JG Gray LTD**

Agent Details Company: **Stoneleigh Planning Partnership**

Contact: Mr R Dunnett

Representation number: **1787** Representation in regard to : **Proposals Map**

Verbatim Submission

Table 3 sets out the Allocated Housing Sites. We support the identification of Site 'Keresley Eco-Suburb' for 3,000 dwellings and support its notation on the Proposals Map.

Officer Recommendation

Representor number **REP-1018**
Representor : **Miss Pamela Statham**

Representation number: **1798** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Please forgive the novice nature of this letter as I have never encountered green belt being changed into housing development and am not familiar with planning and legal jargon. In addition, having only lived in Coventry for 12 months, I was not aware that the legal designation of land in my area was being changed from green belt to development land for 3000 homes (plus more in the bordering parishes). I also apologise if it is somewhat emotional and rambling- but this does come from the heart, and I do hope that as a Council you listen to what people feel and believe in. I hope you do not mind but I have copied in several organisations and people who I see as being 'guardians of the countryside' - I have either had direct contact with them or have admired them from afar. No doubt they are besieged with letters such as mine as Government plans put immense pressure on councils such as yourselves to meet the 'Core Strategy' of providing sufficient housing for our burgeoning population by 2026. However, I simply wished to bring this to their attention as fellow appreciators of the countryside and its benefits.

The background of this issue, as far as I understand- and please do correct me if I am wrong- is that Coventry City Council have now 'safeguarded' land for development, that was once legally 'safeguarded' as greenbelt. The term 'safeguarded' is in my opinion then somewhat of a misnomer here; the council has broken its promise of preserving the green integrity and limiting urban sprawl by reversing this green belt designation. Then conjures up cosy images of protection and guardianship by using the term to bizarrely 'safeguard' a highly lucrative, socially irresponsible, capricious decision to go back on its word and give carte blanche to large scale housing development in a beautiful rural area of ancient Arden.

I know, I come across as some grumpy ranting person who likes things as they have always been, hates change, 'not in my backyard' attitude, and has no thought for accommodating future society. As a planning department, you must endure much hostility and I do not want to add to such negativity- you have a role to fulfil, government targets to meet, and a city to be responsible for- all in all a lot of hard work, often for thankless parties. You know a lot more about town planning and society than I ever could and are privy to plans and information I would never have even considered. You are surely trying to do the best you can, with what you have, now- and I admire that.

However, let me tell you a bit more about myself (hopefully to prove I am not a grumpy person stuck in their ways!). I am a twenty five year old full-time professional female who moved from the countryside 12 months ago (where there was no jobs for my degree in biochemistry) to enjoy a fantastic career based at the University Warwick Science Park, which is in Coventry. To be honest, I was reluctant to come here as I was a country girl and hadn't heard rave reviews about the city, and all Coventry appeared to be when I visited was decaying industry, empty shops, and lots and lots of concrete. I hoped I would be proved wrong, and with a positive attitude was fortunate enough to find a brand new house (built on an old disused bus depot) overlooking lush green fields. Jackpot! Great job, amenities and perfect dog walking and my addiction to green surroundings fulfilled! Coventry was looking good. My solicitors performed in-depth checks to ensure all the surrounding area had no planning applications- nothing came up. All I got was a legal designation of 'green belt' which gave me the confidence and reassurance to go ahead and purchase the property and start my new life in Coventry.

Officer Recommendation No change

Representor number **REP-1018**
Representor : **Miss Pamela Statham**

Representation number: **1799** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

This is what is most striking, the fact this reversal of greenbelt (or 'safeguarding' as it is termed), did not show up on land registry searches. This huge plan for 3000 homes, apparently under discussion by yourselves since 2005, was not disclosed during searches in April 2008. To me, this comes across as withholding information at best, deceit at worst. It also appears nondemocratic- any planning ideas that the public have go through a lengthy process and lots of publicity; this however, seems to have been ushered through at great speed and even greater secrecy. Personally, I have not been made aware of any of the associated deadlines. The lack of communication of this, considering I would be overlooking these houses immediately on my doorstep, has been dismaying and alarming.

However, let us move on from my purely personal and selfish reasons of liking a good view and bemoaning self-pity of lost confidence in my new City Council. I am sure many people react like this and as genuine response as it is, it will not get us anywhere constructively. I just wanted to let you know how this does affect your people, their trust in you, and their perception of you as a council. If we approach this logically and rationally, there are many concerns I have about this reversal of green belt that I would like to formally register as objections:

Integrity:

What is the point of protecting land as green belt only to remove it later? Please, if you have not done so already, or if only to explain to me, revisit your reasons for making this green belt in the first place- what were your motives? Was it stop urban sprawl from Nuneaton through Bedworth, Coventry, Warwick, Leamington to Stratford? Was it to preserve the ancient hedgerows and mighty oaks of Ancient Arden heritage? Was it to give biodiversity a chance, or enjoyment and good health to citizens of the city? Was it to allow agriculture to continue and keep producing our food? Was it to give impetus and focus to working on the city from the inside out- urban renaissance, starting with making the inner city thrive?

Communication:

As you are aware I am a new resident of Coventry having moved here 12 months ago. The first I was made aware of the proposals was around the 28th April 2009 when I received a tiny invite to the parish meeting through my letter box. This meeting was on the evening of Friday 15th May the next 3 days being weekend and bank holiday- leaving 3 days to the deadline of the 7th May.

This is shocking and would not be encountered in any other organization or company. To compound this, apparently all information is in the Library and the Coventry Council website. I am a visitor of the Library, but would consider myself paranoid if I were to obsessively check planning every week on land I knew to be green belt; the website is a joke- it is not user friendly, and emails are very slow to be responded to. Conveniently it appears there are no reference numbers for objecting. And I am not computer illiterate.

Why could I not have been informed via the land registry checks performed before I moved to Coventry, a leaflet through my door, or a postcard with my council tax bill?

Apparently I would have been informed if I had asked specifically and outright, but why would I have reason to not believe in the sanctity of green belt or mistrust the results of legal searches?

Another (mis)communication issue I have is how this is referred to as 'safeguarding of green belt'. This sounds great- protecting our wildlife, heritage, precious rural areas and keeping towns unique and individual- not a mass amalgamation. But upon deeper inspection it appears to be quango spiel for land banking and profit, in that you are "safeguarding" (i.e. sacrificing) green belt for housing.

Officer Recommendation No change

Keresley

Representor number **REP-1018**

Representor : **Miss Pamela Statham**

Representation number: **2299** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

....cont

more buses. Regrettably most of these go into the town centre at the moment. For me to get to work by bus takes 2 hours and 2 buses- in the car on a good day it takes 15 minutes. Therefore I do not perceive more buses to be the answer, they are unpopular, inefficient, non-cost effective fume splutterers.

Food and agriculture:

Foodmiles have recently become a lot higher in the public consciousness. How can we keep our foodmiles down if we build on our agricultural land, particularly close to the cities? More importantly, now the City Farm has closed due to the Council not being able to fund it (along with Allesley walled garden too I believe), how can the City ever have contact with and appreciation of the industry that provides what we eat every day?

Eco-Town:

Unfortunately, I believe 'eco' here must indicate 'economical' not 'ecology'. It is with regret that this phrase is liberally peppered around to coerce people into agreeing to it and green-light it for planning, yet there does not seem to be anything particularly 'eco' to me about tarmac, concrete, and more commuters all built on the lungs of our city. The most 'eco' thing I can think of is precious Green Belt.

Pollution:

It is at the edges of our city where we seek refuge from noise, chemical, fume and light pollution.

A new development will create this pollution in the current safe haven of the green belt. I

beseech you to make the most of the derelict areas you already have closer to the city centre.

Landowners:

I understand from the meeting that the Landowners of the Green belt are positively pushing for it to be turned into Development. One cannot blame them- the money they get will no doubt be very desirable compared to the hard slog of farming. I also sympathise with them for all they must have endured over the years; I notice the farm near my home shows evidence of a proud Friesian herd- now all I see is dilapidated water troughs and cattle road safety signs spray painted 'BSE'. I can only assume they were afflicted with that terrible prion and endured alienation from those unfamiliar with farming. On my walks, I sometimes see people letting their children or dogs trample or soil crops, scare livestock, evidence of crops being set alight, and always the omnipotent litter. For all these signals I feel deep sympathy for the landowners and can see their light at the end of the tunnel- selling their land and its burdens of bordering the city, must be liberating for them.

However, there are a lot more people who enjoy the land, respect it and follow the Country code. It keeps them sane from their stuffy office/factory jobs in sick buildings, bestowing them beauty, fresh air and exercise.

Housing is the obvious easy option- make a difference instead!

Could the handful who disrespect the green belt be doing so out of ignorance? After all, the City farm has been shut down. Maybe this could be the golden opportunity for Coventry Council to do something innovative to enhance community cohesion and education from our more rural surroundings. The creative options are exciting and endless. The existing landowners could sell the green belt if they can't handle the responsibility and need the cash, but not for development.

A co-operative based on 'Community Supported Agriculture' could be set up for example (see Soil Association website- don't worry, its much more user friendly than www.coventry.gov.uk).

This could set up different sectors of exciting grass-roots business, providing local employment, community cohesion, education and local food and products.

Officer Recommendation

No change

Keresley

Representor number **REP-1018**

Representor : **Miss Pamela Statham**

Representation number: **2301** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

These could include:

A rare breed native beef herd (I'm sure the local pubs and restaurants would relish the opportunity to showcase local meat) A rare breed dairy herd (yes the implications of setting up milking facilities, obtaining milk quotas etc are a bit of a barrier, but it could focus on quality not quantity, and education and heritage breeding programme) A veg box scheme- there are fantastic examples of this around the country and we have access to one from 'Down to Earth' in Earlsdon but why not add to it this side of town Coppicing- for wood products and/or agroforestry; celebrating the ancient Arden history Riding for the Disabled group could be set up- the land is beautiful and the therapeutic benefits for those with disabilities are profound Apiaries- recent media coverage has shown the bee population decline to be alarming. Lets do something good for crop pollination, whilst maybe getting honey, beeswax and mead all from helping the bees. Crazy/innovative high value products to get the most out of green belt: cashmere, mozzarella, ostrich eggs, wine, manuka honey?! !!

I agree the ideas above maybe mad and rushed in the 2 days I've had to write this letter, however I prefer to term them creative and 'thinking outside the box'. By showing 'extreme' fun options I want it to open your eyes that there are other things to do with land than just inanely build. These might also bring a quality of life that may be lacking and may also make Coventry an exceptionally desirable welcoming place to live, thus filling the houses you may already build on brown fields, when I suspect otherwise they may stay fairly empty.

Officer Recommendation No change

Keresley

Representor number **REP-1018**

Representor : **Miss Pamela Statham**

Representation number: **2304** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

Conclusion

I believe your proposal to release green belt in the Keresley strategy is Unsound because:

-it is not justified: releasing precious greenbelt to quickly and easily meet Government targets is the uncreative, thoughtless way out. The 'robust' and 'credible' evidence base that appears to have been consulted by yourselves does not seem to correlate with anecdotal evidence absorbed in my short time in Coventry. On the brand new estate I live in, over a year since houses were available, there are still several vacant properties that have not been sold. Therefore I think the need for new housing in this area may not necessarily be justified at this time. Even considering the long time frame of your plan, and therefore developing Coventry for the future, would it not be more prudent to focus on the decaying heart of the city and preserving what precious green areas we have (traditional ancient green, not quickly cheating with sterile country parks)? In this respect I believe your approach is unsound and not justified because this is not the most appropriate strategy when considered against the reasonable alternatives.

The most profound thing I noticed when I moved to Coventry was the plethora of limping dying hideously ugly industrial sites. These are perfect for brownfields development. They will enable new home residents to live in accessible convenient locations with amenities and transport links, whilst simultaneously brightening up Coventry with desirable aesthetically appealing areas (assuming well-thought out planning and architecture). They would be more sustainable given their closer proximity to the city and/or Science Park! business park! university and their associated facilities, employment, and infinitely better transport links and existing wider 'A' roads. They would be more ecologically sound as they would not be destroying ancient greenbelt biodiversity, whilst hopefully people would have to commute less than if they lived out in an uber-suburb satellite town (the 3000 on Keresley, plus their amalgamation with the anticipated building on neighbouring greenbelt in Nuneaton and Bedworth.) I cannot comprehend why existing, ugly, currently useless brownfields sites are not being optimised as part of a creative, inspirational urban renaissance. This to me would be the most logical first step of nurturing Coventry into a thriving admired city.

- it is not Effective.

I agree that building a job lot of housing, employment and infrastructure on swathes of greenbelt North of the City is alluringly Deliverable; one patch of land for all construction deliveries with the added bonus of being relatively close to the M6. This does make sense for certain elements of the 'deliverable' perspective. However, the easy option is invariably not the best option particularly in the long-term. Sticking a band-aid of an 'eco-suburb' will not address the fundamental problems with the city, which need to be approached from the inside out. The most reliable platform to grow and expand the city would be from the derelict brownfields nearer the centre. This is not as 'deliverable' because it requires more forethought imagination and resourcefulness. Unfortunately in life- and maybe even in town planning- the harder route often delivers the best results. As an analogy, I think of developing brownfields as the parallel of drinking mineral water, eating fresh organic steamed veg every evening and then going for a run with friends. It is hard work, sometimes more expensive (when there is no proper planning and budgeting), and always an uphill struggle to begin with but the results shout out for themselves; healthy, attractive, positive, resilient, strong and very desirable! Great features in a person and a city!

Officer Recommendation

No change

Representor number **REP-1018**
Representor : **Miss Pamela Statham**

Representation number: **2305** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

Sometimes, when you're feeling low and pathetic you don't want to do this you want to slob on the couch in front of the telly with quick fixes of deep fat fried stuff, ice cream and fizzy drinks plus a load of booze. Its very quick and easy, cheap, it may even cheer you up in the short term- but it is a bandaid for the sad state of affairs that's going on inside. Soon this may result in embarrassment, lack of community interaction, low self-esteem, and consequent ugliness - all bad debilitating features for a person or a city. It would be the equivalent of building on greenbelt; its quick, easy, makes you feel better as a short high- but really, deep down we know it is not an improvement, more a detriment with hidden serious long term consequences which may not be pretty.

- It is not Flexible.

Once the green belt status has been removed this has actually become inflexible. We are now unable to handle changing circumstances such as becoming more sustainable as agricultural land will be built on, thus increasing our food miles. We would become inflexible as to what sort of biodiversity could now exist- we have severely limited, almost castrated, that potential. If new Government regulations came in wanting to push for more exercise, or people getting out more, or protecting our wildlife more- you may wish the flexibility that green belt provides had been appreciated. Essentially, you are trying to jump through the Government hoops of housing/development targets now by quickly arranging for a bodge job suburb all in one splurge. But looking to the future, what if the Government do an about tum and want something contradictory (it has been known!) that you also have to jump hoops through but have now cut your nose to spite the face as rare precious greenbelt has been sacrificed and built on- you are left with diminished, inflexible resources. At the moment, you are being a reactive Council not a proactive Council. You know your City better than the Government, you also know it infinitely better than the independent outside consultants you brought in. Use your knowledge to make a change to this city- something our grandchildren can be proud of.

- Able to be monitored.

I pessimistically suspect this monitoring of the strategy will be performed by some uncontactable non-accountable quango and/or not produce anything measurable or coherent, particularly to the public.

I propose that instead of the possibly biased monitoring body that may be implemented, we encourage a more balanced democratic review by inviting members or speakers to the monitoring panel to include representatives from the following:

Youth schemes and schools

Local residents who may be affected

WI and other community groups

Campaign for the Protection of Rural England, Wildlife Trust, Ramblers

Association - i.e. those whose work may be negatively affected by the strategy

Essentially, the above are the very people who should have been extensively consulted before

making the undemocratic decision of changing green belt land to development land like you have already done so.

- Consistent with national policy.

Due to the atrociously short notice I was given of what is happening, I admit I have not been able to read up on national policy. However, I suspect it discourages building on green belt unless all viable alternatives have been exhausted i.e. build on brown fields first. In my opinion, this does not appear to be the approach Coventry council has conveyed. If it is, great, but in that case, let's develop on brown fields before we even contemplate releasing green belt- that way it has a chance of being conserved for future generations.

I also believe the implementation of the Strategy is illegal because:

- It has not involved the Community

Officer Recommendation No change

Keresley

Representor number **REP-1018**

Representor : **Miss Pamela Statham**

Representation number: **2306** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

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I have not been consulted or even informed about proceedings until after some of the deadlines . I am not intellectually challenged or a recluse, therefore I consider the Community involvement by the Council to have been ineffectual at best, diabolically secretive at worst.

For something so profound, with such far ranging implications, I believe the community involvement has not been reflective of this . If my neighbour wants an extension, I see notices on lampposts. If Coventry Council want to build 3000 homes on my doorstep, plus associated transport and industry - I hear zilch .

You will probably say:

It was on the website; I work in IT and could not find the document in the planning portal of www.coventry.gov.uk. I would even go so far to say as the way it was presented in the website was discriminatory and covert. It was in the Library: I use the Library to get books- I was not paranoid about planning because my solicitor's land registry check showed my anticipated first home to be surrounded by green belt.

It was in the Telegraph: page 47 I believe, but again why would I be concerned if legally the land was described as green belt 12 months ago?

It was in the Council magazine: I have never even seen this since living in

Coventry let alone aware of its existence- is it for council employees only? If it gets pushed through doors I strongly suggest you get new recruits in the Keresley area Local community groups were consulted: my knowledge here is sketchy as I am so new to the situation (it has still not been a week since I discovered the situation), but I understand this included Earlsdon- an entirely different part of the City, but not Keresley??

For every other major decision or impact in my life, the associated bodies have provided 'key facts' or 'crystal mark' style documents. Not only is this simple common courtesy, and often a legal requirement, but it means I feel informed and appreciated and minimises me sending off panicked and shocked protestations. Why could Coventry Council not do something like that months ago?

- It is not sustainable

I understand the strategy has been subject a Sustainability Appraisal and that this is available to me. Again, I will e honest and admit that due to the short nature of when I was informed and the deadline, plus the quagmire of the council website planning portal, I have not consulted this . However, basic common sense must prevail and show that building on green belt- the lungs of our cities- is not sustainable. Building away from the city centre is not sustainable. Making the most of derelict land in the city, which is not photosynthesising or satiating as diverse ecosystem , is infinitely more sustainable.

. Prepared in accordance with the Local Development Scheme

Please tell me the Council has learnt from its post-war panic. When you have a booming population and hurriedly grow and expand in the name of 'progress' you get an urban sprawl world famous for its cheap grey concrete high density living and lack of anything natural or green. This is known globally as 'Coventry'. With its ancient grand heritage, can we not look towards the future to celebrate and enhance this city, not mindlessly build on green belt.

Officer Recommendation

No change

Keresley

Representor number **REP-1018**

Representor : **Miss Pamela Statham**

Representation number: **2307** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

I suspect also, that although you are trying to meet Government recommendations by throwing in a good demographic mix of 'social' and 'executive' housing and everything in between, assigning a whole lump of land to a mass suburb could get precariously close to forming an unmanageable ghetto. With my limited town planning knowledge, I propose that weaving clusters of new development into the existing fabric of Coventry's established residential areas would accelerate community cohesion.

It appears that we may be getting the products of a 'Local Regression Scheme' as opposed to an inspirational, world class, innovative 'Local Development Scheme' .

For the sake of our environment, our children and their children, our heritage, wellbeing and sanity, I implore you to revert the Green belt in Keresley to its former proud and glorious status.

Growth is exciting a d dynamic- Coventry Council have a Golden Opportunity to make a difference and make this city proud. Please listen to your residents and your hearts and use your extensive knowledge of the city with a liberal dashing of creativity to make inspirational ground breaking steps, whilst appreciating the sanctity of our rare and precious green belt.

Although not submitted in the conventional sense due to lack of awareness and communication from the Council, please consider this letter a representation against building on Keresley green belt as part of Coventry's Core Strategy.

Officer Recommendation No change

Representor number **REP-1025**

Representor : **Mr Fisher Mrs Bridge**

Representation number: **1824** Representation in regard to : **Proposed Keresley Eco-suburb**

Verbatim Submission

An apparent lack of consideration has been given to the existing home owners residing in the Keresely and surrounding areas. Such examples include the inadequate communication relating to these proposals. In addition, such details have not appeared on local authority searches, conducted over the last 18 months. Furthermore, some residents in the Nuneaton and Bedworth Borough Council area have only recently learnt of the developments though word of mouth, which raises the argument that not all affected home owners are duly aware of the plans to build on the green belt land surrounding their properties. Insufficient consideration has been given to the proposed volume and distribution of new housing in all proposed areas. Is this volume justified when numerous pre-existing habitable properties in the Coventry and surrounds areas are still vacant?

Officer Recommendation No change.

Representor number **REP-1028**

Representor : **Mr Ian Ellis**

Representation number: **1828** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

In the section headed Flood Risk Management in Paragraph 6.40, it states that 'the location, layout and construction of the Eco-suburb should avoid flood risk. It should not increase the risk of flooding elsewhere...'. However, in Area I of Map 1, Proposed Keresley Eco-Suburb there are fields bounded by Fivefield Road, Bennett's Road and footpath M309 containing the property known as The Poddy. These fields were constructed as an ancient drainage system for the surrounding high ground including Hounds Hill. The contours of this area allow vast amounts of rainwater to be stored and drain away naturally. There are also instances of springs sprouting up in the fields during prolonged bouts of wet weather.

Officer Recommendation No change

Keresley

Representor number **REP-1030**

Representor : **Mr Bob Fisher**

Representation number: **1830** Representation in regard to : **2.4**

Verbatim Submission

The initial consultation phase was not inclusive of enough community involvement contact methods to ensure that as many individuals as possible were informed of the proposals to grab land from green belt for use for housing in order that they could make representations - i.e. to object to the plans as being environmentally unsound. This is entirely supported by the amount of received representations as documented in the Pre-Submission Consultation Statement (Regulation 28 statement). A total of just 43 responses were received from individuals. Even now, May 2008, most of the affected community of Keresley are totally unaware of the plans for the proposed Eco Suburb and, when being told of the plans, they are shocked and horrified. This cannot be not the result of a true and democratic consultation process and, instead, has the appearance of a "back door" implementation policy where development is intentionally approved rapidly to the total ignorance of the community by an uncaring council.

Officer Recommendation No change

Representor number **REP-1042**

Representor : **Sandra Camwell**

Representation number: **1869** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

The scale of growth proposed for Coventry is questionable, no industry, no jobs, no earning capacity, no mortgages!

Officer Recommendation No change.

Keresley

Representor number **REP-1063**

Representor : **Stephen McNaught**

Representation number: **1936** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

I am writing this letter on behalf of my parents, James and Sylvia McNaught, of 14 Fivefield Road, Keresley, Coventry CV7 BJE, where they have lived since 1955, a period greater than 50 years.

They object very strongly to any incursion into green belt land in Keresley (broadly the area to the north of Sandpits Lane, to the northeast of Tamworth Road, to the north of Penny Park Lane, either side of Watery Lane and either side of Fivefield Road, which area you broadly refer to being land northeast of Tamworth Road). The objections should be considered under a number of grounds, as follows:

(a) Infrastructure

The local road infrastructure does not have capacity for anything other minor additional development. This is particularly relevant in relation to the whole section of Bennetts Road South, Bennetts Road and Bennetts Road North from the Shepherd and Shepherdess roundabout right up to Keresley Village. This is also true of Watery Lane, Sandpits Lane and, for that matter, Fivefield Road. It is acknowledged that this is less true of Tamworth Road. Furthermore, the potential for significant improvement to these roads is very limited. This is especially true of the Sandpits Lane junction with Bennetts Road which is a significant bottleneck at present and would only get worse.

(b) Need

It is noted from the draft Core Strategy that significant capacity already exists as being identified by carrying out residential development on land such as the following:

- allocated sites and those with planning permission;
- previously developed land;
- conversions;
- construction of more dwellings in the town centre.

Given that this is envisaged to give rise to a total of 24,000 dwellings, it is very difficult to understand the case for change of the green belt over the next 20 years to 2026.

This potential level of provision without incursion onto green belt is not surprising. At its height, in the late 1960's/early 1970's, the population of Coventry was around 336,000 which excluded the parishes of Allesley and Keresley, which then lay outside the city boundaries. Following a significant decline in population in the next two decades (now reversed) the city's population is well below this at around 300,000 which indicates plenty of capacity does exist.

Officer Recommendation

No change.

Keresley

Representor number **REP-1063**

Representor : **Stephen McNaught**

Representation number: **1937** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

...cont

(c) Sustainability

The green belt at Keresley is not a sustainable location for a major incursion into green belt and whilst it has a regular bus service, it cannot be doubted that the majority of people would resort to car use. This is indisputable.

As a general point, one of the surprises of the draft Core Strategy is that little or nothing is said about improving rail travel in the Coventry area. Given that it is intended as being a forward looking document which recognises Coventry's status as a growth point, it is quite staggering that transportation by rail features so marginally in your thinking. Coventry should no longer be a city in thrall to the car. Why not encourage better use of the Coventry to Nuneaton and Leamington line, working with Network Rail, etc to encourage the re-establishment of stations at Coundon Road or Foleshill? The point here is that within the built area of the city, there is significant sustainable infrastructure that could be improved.

(d) Review All Green Belt at the Same Time

It appears that the City Council is not reviewing the green belt generally at the same time given the statements in respect of Coundon Wedge, for instance. There does not appear to be any justification whatsoever for excluding other green belt areas, e.g. Coundon Wedge, which should be considered for development when compared with Keresley. It is closer to the city centre, it is crossed by the new road constructed to assist movements in and out Jaguar and, of course, the City Council has previously decided that part of the Coundon Wedge would be suitable for taking out of the green belt. Here I am talking about the land which was indicated as being potential Jaguar expansion land. Coventry City Council had already decided that this area of land would be suitable for development associated with the expansion of Jaguar as necessary. Having recognised this particular piece of land's potential for development. that should be considered in advance of a potential incursion into the green belt in the Keresley area.

(e) The Quality of the Green Belt in Keresley - Ancient Arden

The green belt land at Keresley is rolling countryside which makes a very substantial contribution to the purposes of the green belt. It is very attractive landscape and important in ecological terms. Particular features include Hall Brook which runs through it, right from its source at the northern end of Fivefield Road through to Watery Lane, there is ancient woodland including Queen's Wood and Bunson's Wood and the area immediately to the west of Bunson's Wood is very open and prominent (Hound's Hill).

(f) Coventry Northern Regeneration Area

I note the Keresley green belt appears to have been included within the North Coventry Area of Regeneration. This should be treated as a complete irrelevance in deciding where to construct houses. Indeed, it is hard to understand the rationale or justification for including this area within the Coventry Northern Regeneration Zone.

Development within the green belt necessary in relation to the redevelopment of

Coventry Colliery has been permitted by existing permissions and that should be the end of green belt development associated with the regeneration issue.

Officer Recommendation

No change.

Keresley

Representor number **REP-1063**

Representor : **Stephen McNaught**

Representation number: **1938** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

...cont

(g) Another and Better Approach

As a suggested way forward, the Council should concentrate on the urban area where there is significant capacity already identified. Improvements to the local railway network should be a key focus. If there is a need to build on green belt (as yet unproven) a better starting point would be to open discussions with Nuneaton and Bedworth Borough Council and Warwickshire County Council regarding green belt releases for residential purposes on the Nuneaton and Bedworth side of the border.

There must be a much better case for taking this land out of the green belt.

The City Council should also reconsider its position in respect of Coundon Wedge.

I have no particular comments in respect of green belt relaxation at Upper Eastern Green Lane other than to say that this is a matter to comment upon in the future in the event that Coventry City Council persists in considering green belt release at Keresley.

Officer Recommendation

No change.

Keresley

Representor number **REP-1065**

Representor : **Persimmon**

Company: **Permisson Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Glenn Godwin

Representation number: **1943** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Persimmon supports the allocation of site 6. The reassessment of the approved employment use in order to meet strategic housing requirements is 'justified' in terms of RSS, consistent with national policy and effective in terms of being deliverable as a second phase of housing at Bannerbrook Park. See separate sheet for supporting representations.

Officer Recommendation Support welcomed

Representation number: **1946** Representation in regard to : **Policy SG 10: Housing Needs and Mix**

Verbatim Submission

Policy SG10 - 1. THE POLICY NEEDS TO BE MORE FLEXIBLE TO ALLOWFOR PROVEN NEED AND DEMANDOVER THE PLAN PERIOD.

2. REQUIREMENT FOR ALL HOUSING TO BE BUILT TO LIFETIME HOMES (Policy SG6) IS UNREALISTIC AND RESTRICTIVE.

The targets set for various types of housing within the policy need to be flexible to respond to changing circumstances over the timeframe of the Core Strategy to 2026. The requirement for 25% affordable homes or 10% Executive homes over the plan period will not necessarily be based on a robust or credible evidence base for any given location. Some sites may not be appropriate for Executive homes. Furthermore, the policy should recognise that viability issues may restrict the provision of affordable housing.

The requirement for all housing to be built to lifetime Homes is considered to be an unreasonable constraint on development proposals and indeed can have repercussions on the quality of design and densities achieved on allocated sites, particularly in terms of the requirements for car parking arrangements. The requirement will have a significant impact on the City Council's ability to achieve the densities necessary to achieve the housing numbers indicated for housing allocations in Policy SP6 and meet the requirements of the RSS. The last sentence can be dealt with by supplementary guidance on sustainability.

Officer Recommendation No change

Keresley

Representor number **REP-1065**

Representor : **Persimmon**

Company: **Permisson Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Glenn Godwin

Representation number: **1947** Representation in regard to : **Policy SG 12: Residential Density**

Verbatim Submission

The draft policy implies a design led approach which would not have regard to the national indicative minimum density of 30 dph. The criteria do not provide effective policy for determining applications.

Persimmon consider that Policy SG12 is "unsound" by not being consistent with National Policy and neither is it effective by being founded on credible factors that influence density.

PPS3 (para 47) considers that "Local Planning Authorities may wish to set out a range of densities across the plan area rather than one broad density range although 30 dwellings per hectare (dph) net should be used a national indicative minimum to guide policy development and decision-making until local density policies are in place".

Policy SG12 would be more effective by referring to 30 dph as a "minimum density".

With respect to the factors given as influencing density, Persimmon would comment as follows:

- The first two criteria can be combined to "character of the surrounding area". With respect to this criteria, the 30 dph min. density is important as PPS3 would not necessarily expect areas of particularly low density to be, mimicked by new

development which should generally make more effective use of land and at least meet the minimum density.

- The "highway network and access arrangements" presumably refers to "any constraints to housing numbers in terms of access or capacity of local highway network".

- Open space requirements should not affect the densities to be achieved on the development areas.

- Impact on the amenities of occupiers of nearby properties is a design issue, but should not influence density.

- The living conditions of future residents of the proposed development is also a design issue and should not influence density.

Officer Recommendation

No change.

Keresley

Representor number **REP-1065**

Representor : **Persimmon**

Company: **Permisson Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Glenn Godwin

Representation number: **1948** Representation in regard to : **Policy EQ 4 - Parks, Open Space, Outdoor Sports and Recreation Facilities**

Verbatim Submission

The policy does not allow sufficient flexibility in cases where equivalent replacement green space can be provided, contrary to ppg17.

Policy implies contributions based on commercial gain of development rather than Green space requirement, contrary to circular 05/05.

Persimmon object to Policy EQ4 being "unsound", by being inconsistent with national policy and not sufficiently effective for purposes of determining planning applications.

Persimmon appreciate the general aim of Policy EQ4 which is based upon the long established principles of PPG17 and the Council's Green Space Strategy.

The first line of the 2nd paragraph could be simplified to read:

"Green Spaces and outdoor sports and recreational facilities will be safeguarded etc etc".

The policy has changed its emphasis from that recommended to Committee, and now implies provision of equivalent or improved green space as an exception, whereas this should be elevated to an equal consideration in determining applications, in the interests of making effective use of land for housing and providing the flexibility to deliver improved green space provision in the City.

PPG17 (para 13) recognises that development may provide the opportunity to exchange the use of one site for another to substitute any loss of green space, or sports or recreational facility. The replacement facility should be at least as accessible and equivalent in terms of size, usefulness, attractiveness and quality. PPG17 recognises that this can achieve qualitative improvements to green space.

In accordance with Circular 05/2005 any financial contributions required by Planning Obligations should be directly related to the proposed development and reasonable in all other respects. Contributions should be fairly and reasonably related in scale and kind to the proposed development. In this respect financial contributions to off-site green space provision would normally need to be equivalent to the provision of the equivalent area of green space required by the new development and its maintenance. A contribution in lieu of the commercial value of the site would not be appropriate or fairly related to the planning requirements.

Officer Recommendation

No change.

Keresley

Representor number **REP-1065**

Representor : **Persimmon**

Company: **Permisson Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Glenn Godwin

Representation number: **1949** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

The targets in 'planning for climate change' are not justified by a credible evidence base that such provision can be delivered in a sustainable manner, and is not supported by national policy.

Paragraph 33 of the Planning and Climate Change Supplement to PPS1 states that where policies relating to local requirements for de-centralised energy supply or for sustainable buildings are set out in a DPD, Planning Authorities should:

- "ensure what is proposed is evidence-based and viable, having regard to the overall costs of bring sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities;
- in the case of housing development and when setting development area or site specific expectations, demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing; and
- set out how they intend to advise potential developers on the implementation of the local requirements, and how these will be monitored and enforced".

In respect of "Planning for Climate Change" the policy pays unnecessary attention to securing the use of "Community Heat and Power Systems" without any evidence base to justify this approach. The requirement for all developments of more than 100 units to adopt CHP systems is unrealistic.

CHP plant use Biomass, which is any plant derived organic material that renews itself, over a short period. The most common form of biomass fuel is wood, either chipped or compressed into pellets, which is then burnt directly in a purposely designed boiler.

The Companion Guide to PPS22 describes the technology involved in biomass and energy crops as a fuel on a commercial scale in its variety of forms, and outlines the main planning and environmental implications.

The technology is largely unproven in urban areas and has environmental implications which would not be suited to most urban residential developments. The Companion Guide refers to the following issues to be considered when determining planning applications.

- It refers to benefits to the local 'rural' economy in terms of supplying biomass fuel and transport operators.
- Visual intrusion - a plant for a large residential scheme is essentially an industrial feature with a tall chimney and in certain weather conditions a plume may be evident from the chimney and/or drying equipment.
- Noise from traffic and plant operations.
- Effects on health, local ecology or conservation from airborne and water borne emissions.
- Traffic to and from the site, probably HGVs, to transport biomass fuel and subsequent by products (ash). Traffic volumes, and the associated noise may increase with the introduction of a large biomass power facility, needed to serve a development of 100+ dwellings, as the scheme may require a continuous fuel supply.
- In terms of sustainability and climate change the length of delivery goods vehicles journeys from any biomass source into the urban area may well offset the CO2 emissions reduced on site. The recently approved South East Plan recognises the importance of the use of biomass fuel sourced close to the plant, in terms of maximising carbon savings, rural development and reduced transport distances (para 9.100).

In addition to the above considerations, Biomass CHP installations are generally more suited to mixed use developments, where there may be the opportunity to achieve maximum efficiencies by maintaining demand on a 24 hour basis.

Most residential developments are typically property freeholds and lack an immediate central organisation to own and operate such a facility.

Officer Recommendation

No change.

Representation number: **1952** Representation in regard to : **Policy SG 15 : Provision of Employment Land and Premises**

Verbatim Submission

Support on the basis that policy clarifies that all employment sites allocated under policy SG7 are included as 'exceptions' to the protection of employment land considerations.

Officer Recommendation

No change.

Keresley

Representor number **REP-1070**

Representor : **Kevin & Kelly Sowker**

Representation number: **1970** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission We are concerned that there has been no proper consultation. The impact on local residents seems to have been ignored.

Officer Recommendation No change

Representor number **REP-1072**

Representor : **Mr James McNaught**

Representation number: **1972** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission I am opposed to any encroachment of 'Green Belt' land in any area of Coventry. That out of the way it is my submission that the survey carried out by SSR was biased or at best seriously flawed on at least three counts;

1. If the photograph of Prologs Park was the best example of Keresley that the surveyor could find then they did not spend anytime in the area. I can take any of you to the top of Hounds Hill where the view is the only place in the city boundary that the famed Three Spires of Coventry can be seen without standing in the middle of a road. This view also looks right over Coventry to as far distance as Pailton and Junction 1 of the M6. Whilst on the subject of photographs why was one of Harvest Hill included as it is not geographically located in Keresley, Coundon or Eastern Green?
2. Much play is made of recreational facilities in the Coundon Wedge! Does it boast of a Golf Driving Range or an area where through summer months Horse Show events are held together with the access by footpath from number 46 Fivefield Road all the way through to Corley Rocks.'
3. Emphasis is made on maintaining what is so endearingly termed the Meriden Gap which prevents Coventry sprawling into Solihull! What is wrong with also creating a Keresley Gap to prevent Coventry sprawling into Bedworth and Nuneaton via Keresley Newlands? If as you are claiming there is a need for extra land for housing surely the way forward would be to remove sectors of Green Belt out of each of the three areas (Coundon Wedge, Eastern Green and Keresley)?

Officer Recommendation No change

Keresley

Representor number **REP-1076**

Representor : **Mr & Mrs R Stringer**

Representation number: **1997** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Re Proposed Plan to include Green Belt Land in the Core Strategy Plan for Coventry.

We attended a public meeting recently where a form was supplied to register our thoughts on the Development Plan re the Core Strategy for Coventry, with particular regard to the Green Belt in Keresley. Unfortunately the wrong form appears to have been supplied by the Local Authority Planning Officer at the meeting and cannot be completed for the purpose of making observations.

In considering the proposal that in the Core Strategy Plan, Green Belt Land in the Keresley area should be allocated for future building, we would like to make the following observations/objections.

The proposed land is Green Belt and a 'breathing space' between Coventry and Nuneaton which is why it was made Green Belt in the first place. The land has a wonderful array of wild life including birds such as Woodpeckers, Herons, Buzzards, Kestrels and Owls along with Badgers, Newts, Foxes, Rabbits etc. We suspect that if houses are built in this area a lot of these birds and animals will disappear. The actual land itself is often "boggy" almost certainly has mine shafts there and we know there is a gas main running underneath. We believe the original plan was to build 5,000 houses and once it was pointed out that the gas main was there this has changed to 3,500 houses and an "Eco Park".

It seems to be suggested that this will enhance the area by providing employment as well as housing in an ecological way by cutting down on the amount of travelling etc, that would need to be done between where the people lived and worked. Ecology does not mean tarmac and concrete.

We would suggest that in view of the fact that when the Ricoh Arena was built, the Railway Line was not utilised to provide a Railway Station, which would have alleviated some of the problems with traffic when an event is being staged and therefore we cannot trust the Local Authority to put plans into place to ensure that the same situation does not occur if houses are built in the locality.

When this was discussed during the meeting the Local Authority Planner assured the assembled people that plans would be put in place to ensure that public transport was regular and effective. She also stated that sometimes they got things wrong. It doesn't make us feel as though the City Council are effectively planning or listening to the local population's concerns.

The Government's own Census Statistics show that the population of Coventry fell considerably between 1971 and 2007. We didn't realise that so many people were homeless. The number of houses to be built is about the same number as the drop in population so we believe that the suggestion that houses need to be built on green belt land is unsound.

Therefore we would suggest the Draft Development Plan to build on this Green Belt land is not justified as due to the population decrease, the many brown field sites, houses that are presently empty, along with new housing developments that remain unsold. These sites should provide enough housing for the local population and surrounding areas. Also if the Government are suggesting that houses are built in Coventry to help with housing in the 'West Midlands', we have to assume that many of them will be travelling between homes in Coventry and work elsewhere in the area.

When the plans were put forward for the Belgrade Plaza, the developer couldn't sell the properties which had been built as 'Executive Apartments' these have now become student accommodation. We can't trust the Local Authority to plan building houses to meet a local need and keep to the original so called requirement for housing. After all if there was a shortage of housing they wouldn't have let the properties go for student accommodation.

In conclusion we would strongly urge that plans to allocate future housing on the Green Belt at Keresley are rejected.

Officer Recommendation

No change

Keresley

Representor number **REP-1079**

Representor : **Mrs Katrina Stubbs**

Representation number: **2004** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

We would like to express our objection, alongside many others, who feel that the proposal by Coventry City Council to use green belt land to the North and East of Tamworth road for development to be extremely detrimental to the rural identity of the area. Although Coventry is a large urban area with few open spaces there are areas of unspoilt countryside (areas of natural beauty) that have been protected by green belt status. Fortunately the green belt to the North and East of the Tamworth road has helped to halt the urban sprawl and maintain the local distinctiveness of the parish of Keresley. It also enhances the environment of Coventry aesthetically and improves the environmental quality for local people. In particular it helps to improve the air quality particularly in a city like Coventry where car dependency is high and there is close proximity to the busy M6 motorway. Unfortunately Coventry City Council's proposals which set to parachute in 3,750 houses on the green belt will eradicate and degrade vast areas of the green belt which will in turn have a negative impact on environmental quality for residents in Coventry and will simultaneously erase the rural nature of Keresley and its local identity. The green belt that the Council proposes for development forms part of the only remains of unspoilt ancient Arden countryside. Whilst the Council's strategy claims that heritage is important there are no practical measures that suggest how the unspoilt ancient countryside will be protected, when the Council plans to build on it. In addition, the green belt to be sacrificed comprises of ancient woodlands and fields that provide extremely valuable habitats for plants, animals and birds. Wildlife surveys have classified the land as IA' grade -"An area of very high natural history value, containing several varied habitats and a wide diversity of plants and animals". * Clearly, the building of 3,750 houses and associated infrastructure on the land will mean valuable wildlife will be lost and displaced. The compromise of a 'park' will not offer the same high quality of natural environment and diversity that attracts such wildlife. The building and disruption will have major impact on existing ecosystems. * Coventry City Council Wildlife Survey

Building on green belt will also deprive local residents of opportunities for informal recreation. Considering Coventry offers very few places that provide safe, informal recreation on unspoilt countryside we would have hoped this would be valued by the Council. The green belt proposed for development has numerous public rights of way that are well cared for and unlike the local park there are no signs of anti social behaviour and litter. People of all ages use the land for rambling, organised walks, jogging, dog walking, bird watching and horse riding. These activities offer fresh air and many health benefits. It seems illogical to take away the few free recreational activities on unspoilt countryside in Coventry when the government's nationwide movement 'Change for life' aims at curbing dangerous levels of obesity by encouraging people to exercise. Considering nearly one in every nine children starting primary school in Coventry is obese (11.3 per cent) above the national average of 9.9 per cent according to the latest Department of Health figures we would hope that planning would encourage informal recreation that is particularly accessible to families, particularly now as enjoying the recreation offered by countryside incurs little if no expense. Particularly important now as many people in Coventry have less disposable income for leisure as they face financial hardships due to recession.

Officer Recommendation No change

Keresley

Representor number **REP-1079**

Representor : **Mrs Katrina Stubbs**

Representation number: **2016** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

Furthermore, the proposed development of 3,750 dwellings would completely overwhelm existing local infrastructure. In particular local single lane country roads will not manage with the increased volume of traffic and will become chaotic. We can not see how Coventry City Council intends to ractically implement the environmental credentials it boasts in the 'Eco-suburb'. Whilst the city council's Core strategy talks of encouraging use of more sustainable transport there are little practical suggestions of how this is going to be achieved. There are no local train stations in the area; at present there are no designated cycle routes; amenities are not within a walk able distance; there are no local shops/supermarkets within walking distance that offer 'fresh food' ; no local leisure or entertainment facilities; the hospital is on the other side of the city; little employment opportunities that people can walk to exist and combined with close proximity to the M6 we can not imagine that people will abandon their cars in favour of using the bus or walking. Neither can we see how the Council intend to encourage 'horse riding' when the proposed development will mean stables will be destroyed and fields where people keep their horses will be built on.

We are also concerned (as local residents) about the impacts the proposed development will have on the land physically. The land has been used for mining for many years. The report from The Coal Authority for CV7 8NH)

(Next to area proposed for development) dated (07/11/07) states' is in the likely zone of influence from workings in 1 seam of coal at 650m to 810m depth', and last worked in 1996. The report continues under the heading of future: ' reserves of coal exist in the local area which could be worked at some time in the future'. Furthermore the environment report, conducted by RPS consultants risk management, Environmental consultancy group for CV7 8NH (Next to proposed development) highlights natural subsidence: The property is in an area of natural subsidence hazard potential'. Building 3750 dwellings on land that has been mined and has issues of 'natural subsidence' could have significant implications to land stability and impact on existing properties.

In speaking to local residents within the Keresley parish and neighbouring areas it appears local people know very little about the extent of the proposals for development. There has been little dissemination of information to local people who will be affected by the proposals and a limited public consultation period, which many people know nothing about! Whilst some people had read reports in local newspapers, very few people spoken to knew about the scale of building proposed (3750 dwellings on 269 acres), nor did they know it was given the name tag 'Eco-suburb'. With the Local Democracy, Economic development and construction Bill we would hope as local citizens we would have more input into decisions that directly affect the community in which we live.

Finally as the government is committed to listening to the views, needs and concerns of rural people (DEFRA) we hope that Coventry City Council will listen and respond the opinions of local residents and any developments would reflect local views.

Officer Recommendation No change

Representor number **REP-1085**

Representor : **Mrs Dorothy Hall**

Representation number: **2018** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

1. Consultation ineffective due to information too general, late publication of detailed information and minimal consultation period.
2. Sustainability reports invalid due to current unprecedented national economic circumstances - i.e. failure of entire banking system and recession that is unpredictable.

Officer Recommendation No change

Representor number **REP-1090**Representor : **Ms Bell**Representation number: **2026** Representation in regard to : **Core Strategy Proposed Document****Verbatim Submission**

1. The maps included in both the sustainability appraisal and the core strategy are poor. The colours in the key are often dissimilar to those in the map itself making it difficult to determine what is proposed for each area. When zooming into the map it is difficult to identify where exactly you are looking at. This is very important to those residents, such as myself, who may be directly affected by the proposals.
 2. Consultation. If I hadn't been told about this by my neighbours I would not have been aware of the core strategy. This is particularly appalling as I worked as the councils air quality officer until March 31st 2008. The Council's newsletters have not been delivered since Christmas 2008 and no literature as been put through my door regarding the issue. Considering the proposal for the "Eco" suburb it would have been thought that the Council would go out of their way to consult people this area. I know that when regeneration was occurring in Ball Hill residents were posted newsletters. Obviously the core strategy is not considered as important. I would also complain about the short time period the consultation has occurred over.
 3. Section 6 of the Strategies national guidance misses out PPS 23: Planning and Pollution Control.
 4. Coventry City Councils environmental credentials can be noted by the fact it is the only one of the seven West Midlands local authorities with no air quality or contaminated land officers and an environmental protection section smaller than that of Daventry (population 2001 census 71,838 compared to Coventry's 300844).
 5. Air quality is a human health issue and therefore wherever there are concerns regarding air quality there are also health concerns. As most air pollution is due to road traffic this is an obvious link. The need to decrease obesity and improve fitness is also linked to our over-reliance of transport. I would suggest that the council's policy would be to encourage people to walk and cycle as much as possible and thereby reduce air pollution & traffic congestion and improve public health at the same time. The Core Strategy proposed mentions the Air Quality Action Plan, but does not note that this was for the 3 AQMA's in place in 2005 and does not cover the areas determined in the Detailed Assessment 2007 or the Progress Report of 2008.
- Comments on the "Eco" Suburb Proposal.
- It is incredible that the Council could call the proposal to place 3000 homes on a beautiful area with a wide diversity of habitats that is enjoyed by many people and call it an "eco-suburb". Putting the word eco in front of suburb does not make it sustainable. Surely the most ecological way to do this would be to spread these 3000 homes over many areas not just one. However if it is to be done then a sustainable and ecologically balanced way is obviously the best way. I am concerned that like many of Coventry's good intentions this will not happen the way it seems and this is "green wash" to make the idea sound acceptable. If Coventry is truly committed to sustainability shouldn't all sites be "Eco" developed, for example couldn't brown field land such as Paragon Park be an "Eco" suburb, after already has good transport links and is within easy walking distance of the city centre. It is incredible that the sustainability document Policy SG 9 does not consider this proposal to have any adverse impact on Sustainability Objective 8; To protect and enhance landscapes, local countryside, open spaces and the historic environment. To quote from the councils own material on <http://www.coventry-walks.org.uk/keresleywalks.html>

Officer Recommendation No change

Keresley

Representor number **REP-1090**

Representor : **Ms Bell**

Representation number: **2310** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

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"The rural part of Keresley is an area of historic landscape importance which has its origins dating back to at least the Anglo-Saxon period. Together with the adjoining parish of Allesley, it forms the largest extent of open countryside within the City boundary, and considering its close proximity to the built-up area, has a strong rural character. The landscape is especially significant, as it forms part of the only remaining unspoilt area of Ancient Arden countryside left in the historic County of Warwickshire."

On the western side of the Hall Brook valley, the Tamworth Road marks the edge of the parish. The road runs along a ridge about a hundred feet above the valley, with the slopes partially wooded. At the north-eastern corner of the valley, Bunsons Wood and

Hounds Hill stand about 500 feet above sea level. From Hounds Hill, there are superb views over Keresley with Coventry spires in the distance. The woods in the parish are all deciduous Ancient Woodlands scheduled by English Nature and dating back to before 1600AD (Bunsons Wood, Hall Yard Wood, Pikehorne Wood and The Alders). They are prominent landscape features typical of lowland rural England and extremely valuable habitats for plants, animals and birds. In the spring, a mass of Bluebells carpet the floor of the woods. These Ancient Woodlands and much of the surrounding farmland, has been owned by Queen's College Oxford, since 1529."

"The City Council wildlife surveys which include Keresley parish, have classified much of the area as an "A" grade. "An area of very high natural history value, containing several varied habitats and a wide diversity of plants and animals".

The area is also the highest in Coventry giving great views across Coventry towards the Burton Dassett Hills and the Cotwolds. It would be a great shame to spoil that view. Leaving only 40% of the space green is not very high considering it is around 100% at the moment and much of the area protected habitats, such as scheduled woodland, could not be built on anyway. Currently the farmland, woodland and meadow is well managed and has high level of biodiversity. From just walking through the area I know it is home to several species on the RSPB's red status, er., yellowhammer, house sparrow, skylarks and starlings. Without a full ecological survey of the area carried out over a long time period how can the council make the statement that Biodiversity will not be effected? It is difficult to imagine this will not be reduced. Although I am not pro-hunting the activities of the hunting community do help keep this landscape intact and yet hunting is one of the activities not mentioned under "green infrastructure". Also as the world becomes more populated the demands for food will increase. As the UK will allegedly loose some of its farmland to the sea with climate change and importing food is not a very sustainable option surely we should be encouraging the retention of well managed bio diverse farmland such as that in Keresley and taking advantage of it rather than building on it. Personally I think Keresley could become organic farmland providing local food and possibly biomass. Biodiversity could be increased by use of farm systems such as forest farming. Coventry's close proximity and links to Warwick University's Horticultural Research Institute and Coventry City Councils Conservation and Ecology department make this feasible. Or as Coventry always wants to compete with Birmingham why not have a park similar to Birmingham's Sutton Park ie., managed for the environment.

Officer Recommendation

No change

Keresley

Representor number **REP-1090**

Representor : **Ms Bell**

Representation number: **2311** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

The idea of the eco suburb does not take into account the impact of the development on the volume of traffic this would generate and its impact on local roads. Radford Road is already highly congested from 07:45 to 09:00 weekdays and an exceeds the UK objective for annual mean nitrogen dioxide. Surely any increase in traffic along this road will be detrimental to road safety, congestion, climate change, air pollution, and public health. Surely to encourage commuting by sustainable means the Eco suburb needs have a rail link easily accessible and currently it takes over 40 minutes to reach a train station from Keresley without using a car. It should also have a way to get into the city centre without the by foot or cycle. given the state of Radford Road at present cycling would be unwise and the cycling route down Sandy Lane is impossible to use in rush hour because it is too narrow and congested.

If the idea of an "Eco" suburb gets the go ahead the local community must be provided with very detailed information on what exactly it will entail as currently the information is very sketchy. For example does local shops and amenities being provided mean that a large Tescos will be built on Tamworth Road and is local employment an expansion of Prologis Park? How much say will the local community get in this? Personally I want to continue to see a field of horses and a woods out of my window and wake to the dawn chorus. After all that's why I live here.

Officer Recommendation No change

Representor number **REP-1125**

Representor : **Mr John Goddard**

Representation number: **2122** Representation in regard to : **6.28**

Verbatim Submission

It appears that the local council are taking more green belt from Keresley than is necessary as Eastern GReen have not been involved at all. I feel Keresley are being robbed in favour of Eastern Green. Surely it could have been shared. Why all Keresley?

Officer Recommendation No change

Keresley

Representor number **REP-1127**

Representor : **Mr Merle Gering**

Representation number: **2125** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

I am writing a letter, as agreed by Coventry Planning Department, to express my views on the Core Strategy and the Coventry Strategic Housing Land Assessment, and the proposal to build 3750 homes in Keresley greenbelt land. (please note that it was impossible to electronically complete the DPD Publication Stage Representation Form on a linux based PC)

The proposals to build on Keresley greenbelt are both substantively and procedurally defective, in breach of both national environmental policy, and the obligations of the Aarhus Convention, which are legally binding in the UK.

Procedural failings of the consultation. The consultation process as carried out by the Council cannot be considered by any reasonable person to have been fair, open minded, or sufficient.

1. The public simply was and is not aware of the proposals. There were no notices in local shops, no notices on lamp posts, no leaflets put through the door, no notices at the entrances to foot paths, no prominent articles in the Council's own newspaper which it puts through every door in the city at least 4 times a year, no posters put up about town, no announcements on the local radio. One has to ask, did the Council really want the public to give its views?

The Council only went through the motions of offering consultation, in a furtive and secretive manner. We have knocked on doors and stood in front of the local supermarkets where 2500 people signed our petition of opposition. 70-80% of people we spoke to had never heard of the proposal, let alone the opportunity to offer their views. Does the Council need lessons in how to handout leaflets in the city centre? Do they need help from the promoters of the Moscow State Circus, in how to put up posters, Do they need a hand from a/l the local pizza restaurants who put menus through our mail slots?

2. Finding the relevant documents on the Council website was impossible. A google search or a search using the Council's own search engine did not disclose the documents. You could not find the documents on your own. You needed either guidance from a Council officer, or to know the exact title of the items you were searching for. Pamela Statham, wrote "I have a degree and work as an IT specialist, but still needed to ask you where the documents were on the website!!!

3. The time for consultation on a major change of land use, was entirely too short. The Council has been considering it's position, and commissioning Consultants for years - since 2005. How can it be fair to give the public only 6 weeks to respond? The public is entitled to adequate time to obtain expert advice as well. Otherwise, the process is entirely one sided. In *Greenpeace v the Secretary of State for energy*, the court ruled that 12 weeks (double this period) was entirely too short a period for consultation on a major decision.

4. In view of these deficiencies, this process has not fulfilled any minimum concept of a reasonable or fair consultation. If you claim to consult the public, they must be aware of the proposals and the opportunity to comment. Moreover, you must give adequate time to organise, and to build a public response. 6 weeks is pitifully and woefully short, when the public has to do it's work on weekends and evenings and the council has paid officers working full time (yet they took 4 years). Having failed in so many aspects, the Council's so called consultation does not meet the requirement in the Aarhus convention promote public participation. The Council is in breach of the following requirements of the convention.

Officer Recommendation No change

Representor number **REP-1127**

Representor : **Mr Merle Gering**

Representation number: **2161** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

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the preamble " Considering that, to be able to assert this right and observe this duty, citizens must have access to information, be entitled to participate in decision-making and have access to justice in environmental matters, and acknowledging in this regard that citizens may need assistance in order to exercise their rights, Article 3, Section 2, General Provisions of the Treaty. The Council is in breach of Article 3, Section 2 of the General provisions of the treaty. "2. Each Party shall endeavour to ensure that officials and authorities assist and provide guidance to the public in seeking access to information, in facilitating participation in decision-making and in seeking access to justice in environmental matters." the Council has not "provided assistance or guidance to the public" and in particular made available funds for the public to have adequate expert or legal representation. Without adequate expert and legal resources, in a complicated planning procedure, the public cannot participate in the decision making fairly. Unless the Council offers this support, the whole process is hopelessly tilted in favour of developers, and the government.

Local people have looked at the response form and found it opaque and legalistic - without plain English, without expert advice and representatives provided, the form and the process breach section 2 of the Convention. The authorities have not assisted the public, nor provided adequate guidance..

Section 3, Article 3

The Council is in breach of section 3 of the general provisions of the convention.

"3. Each Party shall promote environmental education and environmental awareness among the public, especially on how to obtain access to information, to participate in decision-making and to obtain access to justice in environmental matters."

As noted above, the Council has not promoted environmental awareness nor how to participate. In fact it has done the reverse. It has kept the whole matter quiet. It has employed the most cursory, and ineffective measures possible to allegedly inform the public. It has not promoted "awareness among the public.....on howto participate in decision-making ".

Section 2, Article 5.

requires" Each Party shall ensure that, within the framework of national legislation, the way in which public authorities make environmental information available to the public is transparent and that environmental information is effectively accessible, ...and that they shall make by: "practical arrangements" for the public Having information hidden on a website, where no one can find it is neither transparent, nor practical. Nor effectively accessible.

Article 6. Public Participation Section 2

2. The public concerned shall be informed, either by public notice or individually as appropriate, early in an environmental decision making procedure, and in an adequate, timely and effective manner, inter alia, of:

- (a) The proposed activity and the application on which a decision will be taken;
- (b) The nature of possible decisions or the draft decision;
- (c) The public authority responsible for making the decision;
- (d) The envisaged procedure, including, as and when this information can be provided:
 - (i) The commencement of the procedure;
 - (ii) The opportunities for the public to participate;
 - (iii) The time and venue of any envisaged public hearing;
 - (iv) An indication of the public authority from which relevant information can be obtained and where the relevant information has been deposited for examination by the public;
 - (v) An indication of the relevant public authority or any other official body to which comments or questions can be submitted and of the time schedule for transmittal of comments or questions; and
 - (vi) An indication of what environmental information relevant to the proposed activity is available; and

Officer Recommendation No change

Keresley

Representor number **REP-1127**

Representor : **Mr Merle Gering**

Representation number: **2162** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

the Council has not informed the public "early in the process" of the commencement of the process or the opportunities to participate. They have been working on it since 2005. Most of the public still does not know about it.. The few measures taken by the Council have failed. We challenge the Council to commission an independent survey organisation to find out the actual level of public awareness of the proposal. I quote from one local resident who lives in the heart of the proposed greenbelt development.

"I attended the meeting on Friday [1 May2009] at the Hare and Hounds which was the first I'd heard about it (I only moved here 12 months ago) and am still reeling from the news and infuriated that the deadline was less than a week from the meeting, 3 days of which were weekend and bank holiday!"

Mrs Pamela Statham, Keresley. The council has not fulfilled its obligation to inform the public in an adequate, timely and effective manner.

Article 6, Sections 3,

3. The public participation procedures shall include reasonable time-frames for the different phases, allowing sufficient time for informing the public in accordance with paragraph 2 above and for the public to prepare and participate effectively during the environmental decision-making.

The Council has not allowed reasonable time for the different phases, nor "sufficient time for the public to prepare, and to participate effectively", 6 weeks is entirely inadequate.

Article 6, Sections 4

4. Each Party shall provide for early public participation, when all options are open and effective public participation can take place. The Council has not invited public participation "when all options are open". In fact, it had decided to build on green belt land at the outset. It commissioned its consultants to I "To identify opportunities for re designation of the Green Belt, which might assist Coventry in meeting some of its projected development land requirements. "Coventry Green Belt Review. The Council did not ask it's consultants to consider alternatives to building on greenbelt land; it did not ask them to do a balanced cost benefit analysis of the building greenbelt land, and other alternatives. Rather it instructed them to go out and find greenbelt land which could be built upon. They had already made their decision at the very start of the process.

5. Each Party should, where appropriate, encourage prospective applicants to identify the public concerned, to enter into discussions, and to provide information regarding the objectives of their application before applying for a permit. The council did not II to identify the public concerned." See the comment above from Mrs S, which is entirely typical of the 2500 people who signed the petition against development in the Keresley greenbelt. They just didn't know about the proposal.

The Council will claim that it approached various groups and networks. The facts on the ground are that these measures failed to inform the public. They may have informed a cosy group of insiders but people living in Keresley and adjoining areas knew nothing about it.

Article 6, 5 6

Each Party shall require the competent public authorities to give the public concerned access for examination, upon request where so required under national law, free of charge and as soon as it becomes available,

(b) A description of the significant effects of the proposed activity on the environment;

(d) A non-technical summary of the above;

(e) An outline of the main alternatives studied by the applicant; and

Officer Recommendation

No change

Keresley

Representor number **REP-1127**

Representor : **Mr Merle Gering**

Representation number: **2296** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

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It is my firm view that the Council has never properly studied the alternatives

(e) -, nor has it properly assessed the damage to be caused by building homes on a piece of greenbelt with great environmental, wildlife, botanical, recreational, historical, educational and aesthetic value to many thousands of people.(b above) There is alternative building land available, and there are good options for building attractive high density housing.- these options will be detailed later in this response.

Substantive Objections to the proposal to build 3750 homes on Greenbelt land on Keresley

The key points

A) The people overwhelmingly do not want this development. In a short space of time. 2,500people have signed a petition against the development.

B) There are good alternatives - both alternative sites and other types of development- which the Council did not fairly or properly consider.

C) Building another suburban development will cause great environmental damage - suburbs inevitably mean cars commuting all over the region, and thousands of weekly school runs and shopping trips to the big Arena Tesco,

and elsewhere- causing excess carbon use, global warming in near and distant lands including arctic melting, extinction of polar bears, flooding of countries like Mauritius, noise pollution, hazard to children and pedestrians in the roads locally, and congestion.

D) putting 33000units in Coventry is disproportionate. Coventry has less than 10% of the areas population but it is being asked to bear the burden of accommodate 40% of the new house building required in the West Midlands. (some 80,000 units)

E) The area has great amenity value

1. It is heavily used for walking, which gives people healthy exercise, and peace of mind. There are proven mental and physical health benefits to both walking and being around trees. Here is one comment from a local resident. (Michelle Trevis)

1. "This area provides a local opportunity to take out Autistic son rambling in a road free and noise reduced environment that he much enjoys and takes great pleasure from."

2. Church Stretton has an annual walking festival. Coventry could too, if it took care to preserve it's beautiful wild lands.

2. It has exceptional plant and animal life - there are 130 plant species identified, buzzards, yellow hammer, green woodpecker, and greater spotted woodpecker, rare blue butterflies and muntjac deer live here" exceptional swathes of marsh marigold and wood anemone grow in Queen's wood. ancient woodland with some of the best blue bells in the country and hedgerows, ponds, and marshland. There are excellent edible mushrooms - parasols, chicken of the wood, blewits and more. To take it out, would greatly damage local biodiversity.

3. This environment, taken together, has great educational value for children - they play here. There is excellent evidence that young children spending time in nature develop faster and better than children in conventional nursery and early school setting.

Teenagers roam here- without harming anyone. It is a place where they can experience autonomy and freedom. Exceedingly important elements of maturing into n adult. Education is undoubtedly going to have to become much more environmentally focussed, if we are going to actually make the lifestyle changes eeded to avert climate change - this is an ideal laboratory within the city to carry out the education. There could be a field studies centre here.

4. The area has great historic value. We know that stone age hunters lived here - you can find stone arrow points nearby, and Roman coins where there was a roman army encampment. Medieval Monks probably constructed the dam on the mere to keep carp.

Officer Recommendation

No change

Representor number **REP-1127**

Representor : **Mr Merle Gering**

Representation number: **2297** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

5. This is part of the Ancient Forest of Arden, an endangered landscape and historic feature - Henry VIII gave it to Queens College Oxford. it needs protecting and preserving. The Council could easily promote it as a tourist feature. It could call itself, "The Ancient Forest of Arden City" - and proclaim 'Come see the beauty of Henry VIII's hunting domain'. We could even have jousts and pageants if the Council had any imagination

6. The site has regional significance. People come from as far away as Derby to attend gun dog training classes held off of Fivefield Rd, near the Mere. It's the only site in the midlands where you can do this.

7. It is a site of great beauty and peace. It has high aesthetic value. You cannot replace it, or make up for it's loss, with a small country park, mostly along side power pylons.

1. The Aarhus convention creates an obligation to protect and preserve those areas which enhance the quality of our lives. It says in the preamble.

1. "Affirming the need to protect, preserve and improve the state of the environment and to ensure sustainable and environmentally sound development,

2. Recognizing that adequate protection of the environment is essential to human well-being

3. in this proposal, the council utterly ignores the importance of pristine traditional natural landscapes for human well being.

8. This development would end up starting another dreary urban sprawl. Once the process starts, it won't end, and houses will stretch from Warwick to Atherston and Lichfield. If you think it's unlikely, look at Birmingham - which stretches from Bromsgrove to Wolverhampton.

9. Nowhere does the Council seek to evaluate and appreciate the harm to all these values, for thousands of children, parents, grandparents, visitors, and animals who use the area over the course of the year. The Victorians called green spaces the green lungs of the city. They are our life support system. Give them away, - and we will choke on our own fumes and dust.

A. Overwhelming public sentiment. The public, when they are consulted, overwhelmingly do not want this development - 2500 people signed the local petition against the building proposal, in a very short time.. Show us your petition of 2500 people who want the development.

Silence from the public, who have not objected, cannot be equated with consent or approval feelings are very strong - see the comments taken from the electronic petition against the development plan.

B. Environmental Folly. Development of a suburban satellite town violates the national environmental strategy to reduce carbon use by 80% by 2050.

Creating another suburb of 3750 homes, each with 2 cars in the drive commuting to Solihull and Warwick" is not ecological whether you call it an eco-town or not. By it's out of town location, it will spawn thousands of weekly commutes to work, school runs, and trips to the supermarket. Suburbs inevitably increase carbon use.

Putting home sinto suburbs makes sensible energy use, like combined heat and power, nearly impossible.

The environmental crisis of our time calls for creative thinking, not tired repetition of the old formulas of the builders and planners C. Alternatives. There are alternatives sites

i. the Jaguarplant in Brown's Lane

ii. the Peugeot Ryton site

iii. the airport - this loses Coventry Council money every year. There is an excellent airport, easily accessible by train in Birmingham. Having a separate airport in every town is an act of civic hubris, which is hugely wasteful of land, and causes excess noise pollution, ground traffic, and risk of disaster (a plane came down in Willenhall a few years ago, narrowly missing homes). To meet the national pollution targets by 2050, we will need to reduce air travel. It makes sense to re-appraise the use of the airport site.

Officer Recommendation

No change

Representor number **REP-1127**

Representor : **Mr Merle Gering**

Representation number: **2298** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

....cont

iv. The Council may wish to preserve industrial sites, but large scale manufacturing is gone for good. - that is the economic evidence available. Large factories will always be in the low wage countries. It won't come back here.

D. There are alternative inner city options which the Council did not fairly look at. .

Consider the following

i. build High quality apartment blocks with large rooms, balconies, a gym swimming pool, and squash court in the basement, and a roof garden on the top of the building. Insulate them to a high standard - there are prototype houses in Brighton which cost exactly £6 a year to heat. People would be interested in that. Make accommodation attractive enough, and people will want to live in it.

ii.. build high density housing around "London Squares". People in London love this and pay high prices for such housing.

iii. In it's SHLAA assessment of building land capacity within the city, it arbitrarily assumed that density would be in the range of 30-49 dwellings per hectare, and then depressed it's figures even lower by assuming that the building would be at the very bottom of that range (30 dwellings per hectare) .

Why didn't the council consider scenarios with higher densities of building (as the Aarhus convention requires them to do)? It shows that they had already made up their minds of the result which they wanted and manipulated the figures to get the right result.

iv. The Council did not consider ways to get the 5000 empty houses in the city into use.

v. The Council did not consider any of these possibilities.- it is wedded to a tired old formula of building ever more dreary low design value homes, which feeds our addictions to motorcars. Suburbs can't and won't exist without dependence on cars.

Appendix: comments from the electronic petition.

"shouldn't be allowed"

"save it!!!"

"This is un acceptable! they have practically broken there own laws! they cannot get away with it!"

"strongly appose this"

"This area provides a local opportunity to take out Autistic son rambling in a road free and noise reduced environment that he much enjoys and takes great pleasure from."

"Please use brown field sites rather than ruining ancient green fields"

"Once the Greenbelt land is lost to development it will be gone forever. Precious greenbelt land should not be sacrificed for short term economic growth and housing."

"I am fed up with seeing all our green back converted to houses or even worse flats appearing absolutely everywhere. Where are all these people working? Even more, why do we need them? Doubt it's for social housing."

I know they have to build houses, but not Keresley"

"SHOCKING!!!!!! SAVE THE GREEN BELT.."

"I agree wholeheartedly, greenbelt should be saved."

"This proposal would be a disaster for the city - green space is not a luxury it's a necessity for people and wildlife"

"We need more green areas... not less. Re-develop the broken before building new!"

"Last thing we need is another monstrous estate - on such a beautiful piece of land.

Please concentrate instead on redeveloping a multitude of smaller areas that have already been built on but abandoned- Mix it up!"

"Coventry is a concrete jungle already, and it is hard enough as it is to find green areas to enjoy . Soon there will be nothing but the memorial park left. Please do not build on this piece of land."

"I have responded to the consultation and believe the proposal to deselect green belt in Coventry is unsound and unsustainable"

"This development would destroy a treasure of the City. The Council should be promoting itself as the Ancient Forest of Arden city"

Officer Recommendation

No change

Keresley

Representor number **REP-1130**

Representor : **Mr Clive Kavanagh**

Representation number: **2132** Representation in regard to : **Map 1 Coventry Solihull Warwickshire Sub-regional Strategy**

Verbatim Submission Areas I and J extend further than the original proposed development area than were originally told about. We were told about "in fill" development. Area J is not "in fill" it is out on a limb!

Officer Recommendation No change.

Representor number **REP-1135**

Representor : **Mr M Jackson**

Representation number: **2140** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission Objection to proposed eco-suburb. Residential development would destroy one of the most scenic parts of Coventry. Consultation process has been inadequate.

Officer Recommendation No change.

Keresley

Representor number **REP-1138**

Representor : **Mrs Linda Edge**

Representation number: **2146** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Unable to complete the official form due to it's complexity, I hope you will accept this letter as my representation against the proposal put forward by Coventry City Council in it's Core Strategy for development of 3750 houses / country park at Keresley. A directive to Coventry has seen them name Green Belt land and I strongly object to this on the grounds of:-

- Lack of easy to understand information and consultation
- Green Belt issue would be an environmental disaster
- Historical
- Alternative brownfield sites
- Democratic Rights

Forgive my longevity of expression, but because of an appalling lack of communication and consultation from Coventry City Council, I wished to convey to you as much information as I believe relevant to the task that is before you.

This has generated outrage among the few who are now enlightened as to what is occurring right here, right now. To this day, there are too many who are not even aware of what is slipping under the radar due to lack of communication to the electorate, and no proper consultation taking place prior to Preferred Options made. Against a vote within Council of a 26 / 25 majority, only a matter of weeks ago, does not exactly seem an overwhelming verdict that this proposal should have been considered. All inhabitants should have their say. Greed and Avarice

Of course the land owners will put their hands up to sell the land purely for the money gain, but they are not just owners of land, they are owners of Green Belt land and have a duty of responsibility. The want, want, want, more, more, more culture has already seen the Finance world bring the Country to it's knees, leaving future generations to pick up on our debt. Are we now to see the same happen to rural England and it's benefits lost too?

City of Coventry

This area did not always fall within the Coventry boundary, and was much contested in the 1960's when the West Midlands General Review Area was

conducted on the adjustment to boundaries, The final report from the Minister, having taken account of the building inspector's view that this area should be looked at further, expressed that this area would be unlikely to be built on and should remain within the county. The inquiry brought up many concerns as to whether Coventry were the best custodians of this land. Coventry recognised the area as Green Belt land and agreed, in being designated such, was preserved from development. There was an overwhelming fear that eventually they would put it forward for development, and now those worst fears are being realised. Coventry needs to achieve greater improvement to the city centre before expansion, and is in danger of becoming too urbanised. Coventry is an historic city, steeped in history and much is made of this in attracting people to the area on the Council's own website for Coventry Walks. Much is made in the approach signs to the city as to being historic.

It has Medieval connections, in fact, land within this Green Belt was covenanted to Queens College, Oxford by King Henry VIII in 1529. Water plays a big part in this area, in fact, monks dammed a stream at the top of Fivefield Road creating a lake to breed carp, providing them with food to eat. This lake remains today.

Officer Recommendation No change

Keresley

Representor number **REP-1138**

Representor : **Mrs Linda Edge**

Representation number: **2147** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission

...cont

Environment and Use

A petition has been submitted to Coventry City Council, raised by Keresley residents, but it's diversity of signatures from outside the area expresses the same convictions, and love and affinity, felt by others who share in it's attraction of being valued in it's greenfield state.

It lends itself to accommodate rural activities, healthy outdoor activities such as horse riding with competitive gymkhanas, walking inclusive of power walking as well as a gentle stroll. All is enjoyed by those outside of the community as well as those within.

Nature conservation and observation, and educational studies make this a functional area of outstanding natural beauty, working and living alongside

pure nature accessible to all, and people wish it to remain. Development would inevitably see the destruction of valuable ancient hedgerows, trees and wildlife.

The land is predominately agricultural and also falls within the Ancient Arden which Coventry have promised to protect - a conflict of terms when viewed alongside the proposal of an injection of 3750 houses.

If passed over to housing it would totally decimate an area where people, and their generations, have chosen to live for what it is. It would constitute urban sprawl, overdevelopment of the area and the infrastructure unable to cope. Traffic congestion already exists into the city at peak times, and the main local source of employment of Prologis Park, consisting of warehouse units, is serviced by wagons and lorries which does not lend itself to the new proposal of an eco image.

Local people have seen those try for housing development in the past, and with their knowledge talk about it failing due to perpetuity.

Sustainability

Keresley was a mining village and the area encases numerous mine shafts.

What would a disturbance of this magnitude result in to existing local inhabitant's dwellings. Environment surveyors reported for a house exchanging hands in November 2007 in Durham Close that "The property is in an area of natural subsidence hazard potential." The Coal Board reported, at the same time, "The property is in the likely zone of influence from workings in 1 seam of coal."

Brownfield sites An area exists in its brownfield state in the shape of Coventry Airport which has become a loss making burden to the city of Coventry, airlines

having abandoned it. Could this not be viewed as a viable alternative to encroachment on Green Belt, especially with the expansion of Birmingham Airport.

The Green Belt in this area more than meets it's requirements in it's use and Purpose. This proposed area is a jewel in the city's crown and should not be broken. Housing was always deemed an inappropriate use of Green Belt, something much respected by other councils. I appeal to you not to remove

this land from Green Belt and to be reserved for housing, but to apply perpetuity and see this proposal fail.

Officer Recommendation

No change

Keresley

Representor number **REP-1141**

Representor : **D Cepland**

Representation number: **2155** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

I am strongly opposed to the proposed Keresley ECO suburb.

I moved into the area 41 years ago and had little choice at the time, as I was only six months old. I have, however had the choice to move away from the area should I so wish to do so. Due to job losses in the area I am now forced to travel to Gaydon, there are no public transport services to support this. The reality is that as the City Centres diminish due to the ever-growing popularity of outside retailing more and more people are, and will, have to travel further to keep a job. Therefore more and more people will be reliant on personal transport. There is no new road infrastructure to support this, thus compromising the safety of the road users and pedestrians. There will also be an increase in vehicle noise, wear and tear to the roads and pollution. When I was transferred to Gaydon I seriously looked into moving from the area as the mileage and hours travelling turned my long days into even longer days. After months of searching there was still no contest. I could find nowhere that had what I have today. I have a bus stop outside my door that takes me to the City Centre. In the same time it takes me to get to the bus stop I could also be entering the unspoilt and tranquil countryside.

The proposal is to save 40% of the greenbelt to create a country park, but that is little compensation for the natural, unspoilt park I have on my doorstep today. I sometimes visit Coombe Park or the Memorial Park but feel that they are so contrived. People turn up in their car loads, play, shout and laugh, eat burgers and ice creams from the vans provided and walk/run along the concrete pavements.

However, walking through the fields in Keresley there is almost silence, apart from the sounds of nature, the birds chatting; the leaves rustling in the winds, the far away bark of a dog being walked in the next field. The smells are also natural and it is possible to stand there and feel like you are the only person in the world. People may be living longer (as suggested at the meeting) but how many more people now suffer from stress, anxieties and have nowhere to wind down. I can guarantee that spending time walking these fields is the best stress relief I have ever known - you can't put a price on it.

In my free time I run a household and garden, support voluntary community based activities and study in the evenings to learn extra skills in the event that I should lose my current job. What little 'me' time I do get is extremely precious, and I love to sit in my garden and read a book in peace and quiet. I currently have a neighbour either side so there is little noise, however should the proposal go ahead to build on the land behind me I will no longer have that luxury, the noise levels will rise dramatically.

Having been here for 41 years I have seen a lot of people move to the area, most of which have worked hard to better their standard of living and be able to afford a property in this wonderful location. The people who are attracted to this area are all like-minded and appreciate the surroundings so much - there is a real feeling of community that I fail to find anywhere else.

I don't want to leave my home and, like many others envisage being here until the end. Yes I have sentimental attachments to my home but that would not be enough to keep me here - it's the wonderful location, the wonderful people who are attracted here and the real strong community that keeps me here. I believe that the 3,000 proposed houses in the area will have a negative affect to the area and the community, and sadly I will just become one of many victims.

I have tried to convey what the area means to the community and myself but there are no words that can do it justice. I can only hope and pray that you take the considerations of the community into account and realise that it is wrong to build here.

Officer Recommendation

No change

Keresley

Representor number **REP-1141**

Representor : **D Cepland**

Representation number: **2156** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

I am strongly opposed to the proposed Keresley ECO suburb.

I moved into the area 41 years ago and had little choice at the time, as I was only six months old. I have, however had the choice to move away from the area should I so wish to do so.

Due to job losses in the area I am now forced to travel to Gaydon, there are no public transport services to support this. The reality is that as the City Centres diminish due to the ever-growing popularity of outside retailing more and more people are, and will, have to travel further to keep a job. Therefore more and more people will be reliant on personal transport. There is no new road infrastructure to support this, thus compromising the safety of the road users and pedestrians. There will also be an increase in vehicle noise, wear and tear to the roads and pollution.

When I was transferred to Gaydon I seriously looked into moving from the area as the mileage and hours travelling turned my long days into even longer days. After

months of searching there was still no contest. I could find nowhere that had what I have today. I have a bus stop outside my door that takes me to the City Centre. In the same time it takes me to get to the bus stop I could also be entering the unspoilt and tranquil countryside.

The proposal is to save 40% of the greenbelt to create a country park, but that is little compensation for the natural, unspoilt park I have on my doorstep today. I sometimes visit Coombe Park or the Memorial Park but feel that they are so contrived. People turn up in their car loads, play, shout and laugh, eat burgers and ice creams from the vans provided and walk/run along the concrete pavements.

However, walking through the fields in Keresley there is almost silence, apart from the sounds of nature, the birds chatting; the leaves rustling in the winds, the far away bark of a dog being walked in the next field. The smells are also natural and it is possible to stand there and feel like you are the only person in the world. People may be living longer (as suggested at the meeting) but how many more people now suffer from stress, anxieties and have nowhere to wind down. I can guarantee that spending time walking these fields is the best stress relief I have ever known - you can't put a price on it.

In my free time I run a household and garden, support voluntary community based activities and study in the evenings to learn extra skills in the event that I should lose my current job. What little 'me' time I do get is extremely precious, and I love to sit in my garden and read a book in peace and quiet. I currently have a neighbour either side so there is little noise, however should the proposal go ahead to build on the land behind me I will no longer have that luxury, the noise levels will rise dramatically.

Having been here for 41 years I have seen a lot of people move to the area, most of which have worked hard to better their standard of living and be able to afford a property in this wonderful location. The people who are attracted to this area are all like-minded and appreciate the surroundings so much - there is a real feeling of community that I fail to find anywhere else.

I don't want to leave my home and, like many others envisage being here until the end. Yes I have sentimental attachments to my home but that would not be enough to keep me here - it's the wonderful location, the wonderful people who are attracted here and the real strong community that keeps me here. I believe that the 3,000 proposed houses in the area will have a negative affect to the area and the community, and sadly I will just become one of many victims.

I have tried to convey what the area means to the community and myself but there are no words that can do it justice. I can only hope and pray that you take the considerations of the community into account and realise that it is wrong to build here.

Officer Recommendation

No change

Keresley

Representor number **REP-1141**

Representor : **D Cepland**

Representation number: **2157** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission

I am strongly opposed to the proposed Keresley ECO suburb.

I moved into the area 41 years ago and had little choice at the time, as I was only six months old. I have, however had the choice to move away from the area should I so wish to do so.

Due to job losses in the area I am now forced to travel to Gaydon, there are no public transport services to support this. The reality is that as the City Centres diminish due to the ever-growing popularity of outside retailing more and more people are, and will, have to travel further to keep a job. Therefore more and more people will be reliant on personal transport. There is no new road infrastructure to support this, thus compromising the safety of the road users and pedestrians. There will also be an increase in vehicle noise, wear and tear to the roads and pollution.

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I don't want to leave my home and, like many others envisage being here until the end. Yes I have sentimental attachments to my home but that would not be enough to keep me here - it's the wonderful location, the wonderful people who are attracted here and the real strong community that keeps me here. I believe that the 3,000 proposed houses in the area will have a negative affect to the area and the community, and sadly I will just become one of many victims.

I have tried to convey what the area means to the community and myself but there are no words that can do it justice. I can only hope and pray that you take the considerations of the community into account and realise that it is wrong to build here.

Officer Recommendation No change

Keresley

Representor number **REP-1142**

Representor : **Annie Turnball**

Representation number: **2158** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

The Keresley development is contrary to the future of the area and of sustaining the needs of the people of Coventry and surrounding areas.

~ Green belt has been developed in the past eroding the area

~ Analysis is not sufficient to base a decision on because once the change of use has been established it cannot be REVOKED

~ Needs should be met by revising the agricultural industry the Times newspaper has forecast a shortage of food where would this food be produced if we sustain the erosion of green belt land

~ The proposed site is home to badger sets

~ Badgers are legally protected under the Badgers Act 1992 they are protected from lawful activity such as building developments

~ THE LOCAL RESOURCES are insufficient to provide for the basic needs of water/drainage/transport/access

~ Any agriculture taking place in the area will find it increasingly difficult to access the land

~ A primary school is proposed with developers meeting the cost of construction however who will meet the cost of maintenance and staff required to run the school

~ Senior schools in the area are oversubscribed

The present climate of building homes is non-existent with properties laying empty or sites ceasing development. Employment in the area is in decline and will not increase to the level required to sustain the influx of residents.

This plan is not justified to the area or the expense of producing it, the people of Coventry do not have their quality of life increased by the Development Plan.

Officer Recommendation

No change

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2179** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

We consider that Section 5: Spatial Strategy of the Proposed Submission Core Strategy is unsound. Set out below are our comments in respect of particular paragraphs from Section 5, and the reasons why we consider they are variously unjustified, ineffective and inconsistent with national policy. We have suggested alternative wording for these paragraphs or ways in which consideration should be given to their re-wording such that this section of the Core Strategy can be rendered sound.

Officer Recommendation No change.

Representation number: **2180** Representation in regard to : **5.3**

Verbatim Submission

2.2 These paragraphs are unsound as they are ineffective in failing to identify that the Core Strategy should set out clearly policies for delivering the level of housing provision anticipated in the emerging RSS, 33,500 net new dwellings to 2026. Paragraph 5.3 is appropriate in referring to Coventry as a focus for growth within the sub-region, however referring only to the need for jobs and investment is partial and incomplete.

2.3 Paragraphs 5.3 and 5.4 are also inconsistent with national planning policy. PPS1 at Paragraph 27(iv) states that in preparing development plans, Planning Authorities should seek to "bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing, for industrial development for retail and commercial development, and for leisure and recreation - taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management, and the need to avoid flood risk and other natural hazards".

2.4 Furthermore PPS3 at Paragraph 53 states that "Local Planning Authorities should set out in local development documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy. In circumstances where Regional Spatial strategies are in development, or subject to review, Local Planning Authorities should also have regard to the level of housing provision as proposed in the relevant emerging Regional Spatial Strategy".

2.5 We therefore believe that Paragraphs 5.3 and 5.4 should be re-worded to include clear reference to the role of the Core Strategy in providing a Spatial Strategy which will deliver sustainable development, by bringing forward sufficient land in appropriate locations to meet as far as possible the emerging RSS requirement for housing, for industrial development, for retail and commercial development, for leisure and recreation and for other identified land uses.

Officer Recommendation No change

Representation number: **2182** Representation in regard to : **5.5**

Verbatim Submission

This paragraph is clumsily written and inaccurately represents national planning policy with regard to delivering sustainable development and growth. As such therefore the paragraph is unsound in its current form, and we recommend either its deletion as it adds little to national policy, or its re-wording, alongside Paragraphs 5.3 and 5.4 so as to reflect properly national planning policy with regard to sustainable development and the Spatial Strategy which can deliver it in Coventry.

Officer Recommendation No change

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2183** Representation in regard to : **5.6**

Verbatim Submission

2.7 This paragraph is unsound as it is unjustified, ineffective and inconsistent with national planning policy. It is unjustified as it is not supported by the Council 's own evidence, particularly with regard to the identification of a supply of specific deliverable or developable sites for housing . We find the Council's approach to the supply, distribution and release of land for housing unsound on the basis that it is inconsistent with PPS3, is not justified by its own evidence, in particular its SHLAA and ineffective by failing to demonstrate how an adequate supply of housing can be delivered.

2.8 Reference in Paragraph 5.6 to "the first part of the plan period" is vague and not supported elsewhere by clarity with regard to any proposed phasing. The paragraph is however correct to refer to the need to plan for sustainable extensions to the built up area. However, the last sentence of Paragraph 5.6 suggests that the release of sustainable urban extensions will be delayed to some point in the future. In fact the Council's own evidence contained both in the SHLAA and within Section 6 of the Core Strategy is unequivocal in setting out the fact that the emerging housing requirement in the RSS of 33,500 net new dwellings over the period 20062026 cannot be met in the existing built up area . This fact is already demonstrated . In its own terms therefore the Core Strategy should plan for sustainable urban extensions to the built up area at the outset of the plan per iod.

2.9 Given reference later in Section 5 to the need for sustainable urban extensions and Green Belt release, Paragraph 5.6 is superfluous and should be deleted .

Officer Recommendation No change

Representation number: **2184** Representation in regard to : **5.8**

Verbatim Submission

This paragraph is not justified by evidence, would render the Core Strategy ineffective in delivering a broad range of sustainable development requirements, and is inconsistent with national planning policy, particu larly PPS 1 and PPS3 in relation to the need to plan for the delivery of sufficient housing land to meet identified requirements. Paragraph 5.8 is therefore unsound. To the extent that it is necessary at all, the paragraph should be replaced by wording that sets out the need for the Core Strategy to enable sufficient land of suitable quality in appropriate locations to be identified to meet a wide range of development needs.

Officer Recommendation No change

Representation number: **2185** Representation in regard to : **5.12**

Verbatim Submission

We refer later in our representations to our view that the Core Strategy is unsound in assuming that the SHLAA has identified capacity for approximately 22,800 net new dwellings, however Paragraph 5.12 is correct in clearl y identifying a need for the allocation of additional land within Coventry City's boundaries in order to address the under-supply of housing land (of whatever quantity) which is identified. As mentioned earlier, we do not believe that it is sound for the Core Strategy to suggest albeit loosely, references to phasing of the release of housing land.

Paragraph 5.12 contains the phrase "new housing developments will first and foremost be directed to sustainable locations within the built up area to assist regeneration and utilise existing infrastructure". The phrase 'first and foremost' should be deleted. There is a clear need for Coventry to plan for the development of housing land concurrently in a range of locations , including sustainable urban extensions, from the outset of the remaining plan period.

Officer Recommendation No change

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2186** Representation in regard to : **5.14**

Verbatim Submission

The City Council is correct to emphasise the importance of the regeneration of priority areas, and the contribution they can make to future housing growth over the period to 2026. However, the final sentence of Paragraph 5.14 is unsound. It is unjustified as there is no evidence to support the assertion made. Unless greenfield and Green Belt land is brought forward for development early within the plan period the Core Strategy will also be ineffective because it will fail to deliver appropriate levels of housing development.

Officer Recommendation No change

Representation number: **2187** Representation in regard to : **5.18**

Verbatim Submission

2.13 We believe the Council's approach to the Green Belt as set out in the Core Strategy is unsound. It is inconsistent with national planning policy, as set out in PPG2. We refer to this serious inconsistency later in our representations.

2.14 Reference to the Green Belt in a sub-section headed Improving Environmental Quality is wrong, and unsound. Green Belt policy is not an arm of environmental policy, and reference to removing land from the Green Belt for development should be deleted from this section of the Core Strategy. If the Council consider it appropriate, Paragraph 5.18 should refer solely to the benefits of green infrastructure to the sustainable development of the City.

Officer Recommendation Minor change. Amend 'safeguarding' to read 'reserved'

Representation number: **2188** Representation in regard to : **POLICY SG1 - DEVELOPMENT**

Verbatim Submission

Paragraph 6.2 and Policy SG1: Development are superfluous and add nothing to the Core Strategy. Their inclusion in the document is unsound, as they are inconsistent with PPS12, Paragraph 4.32, adding nothing to existing national and regional policy.

Officer Recommendation No change

Representation number: **2189** Representation in regard to : **6.7**

Verbatim Submission

We consider it is unsound to include a reference to the Council's adopted SPD - Delivering a More Sustainable City (2009). This SPD does not accord with the Planning and Climate Change Supplement to PPS1 in particular Paragraph 33. Paragraph 33 requires that policies relating to local requirements for de-centralised energy supply or for sustainable buildings should be set out in a DPD, so as to ensure examination by an independent Inspector. We are concerned that this reference to the SPD at Paragraph 6.7 if it remains in the Core Strategy could inappropriately add weight to a document which has not been developed in accordance with national planning policy. We therefore seek removal of Paragraph 6.7.

Officer Recommendation No change

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2190** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

We consider that Policy SG2: Sustainability is unsound as it is not justified and is inconsistent with national planning policy. Paragraph 33 of the Planning and Climate Change Supplement to PPS1 states that where policies relating to local requirements for de-centralised energy supply or for sustainable buildings are set out in a DPD, Planning Authorities should:

- "ensure what is proposed is evidence-based and viable, having regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities;
- in the case of housing development and when setting development area or site-specific expectations, demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing; and
- set out how they intend to advise potential developers on the implementation of the local requirements, and how these will be monitored and enforced".

3.4 None of the above requirements have been adhered to by Coventry City Council, and therefore Policy SG2 as it stands is unsound. The policy should be re-worded such that the important factors which it addresses should be encouraged in all new developments, in order to meet the challenge of climate change. For example, reference to carbon neutrality is ambiguous without any clear definition in the Core Strategy, supported by evidence, and furthermore no evidence has been produced to support the thresholds in relation to community heat and power systems.

Officer Recommendation No change

Representation number: **2191** Representation in regard to : **6.29**

Verbatim Submission

It is unsound for the Core Strategy to place any reliance on draft Policy CF4 from the RSS Preferred Option as supporting a phased approach to the release of sites in the City. Policy CF4 has been subject to significant objection as part of the Examination in Public into the RSS, including by the Government Office - West Midlands. Placing reliance on a draft policy in such a way is unjustified, and in the instance of Coventry delaying the release of greenfield and Green Belt sites would not be consistent with PPS3 and the requirements for identifying a continuous housing land supply.

Officer Recommendation No change

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2192** Representation in regard to : **TABLE 2: COMPONENTS OF HOUSING SUPPLY 2006 TO 2026**

Verbatim Submission

We find Table 2 in the Core Strategy unsound. Table 2 is unsound as it is not justified by evidence, including the Council's own evidence contained in the SHLAA, adopts an inflexible and restrictive approach to the delivery of the Core Strategy and is inconsistent with PPS3.

3.7 There are three main components of Table 2 that we consider unsound. Table 2 identifies that full and outline planning permissions amount to 2,560 dwellings. Having reviewed the list of sites contained with in Coventry City Council's Annual Monitoring Report published in April 2008, a number of the sites consist of high density city centre proposals which cumulatively amount to 1,190 dwellings. Coventry City Council's Annual Monitoring Report for 2008 identifies that there were no dwelling completions in the City Centre in 2006-2008, and at paragraph 5.17 suggests the reasons for this could be:

- the City Centre is at saturation point in terms of apartment provision;

The focus of developers on developing sites outside of the centre, with particular focus on regeneration areas or large-scale redevelopment.

- there may be difficulties associated with the remaining City Centre sites which have prevented their development;

- and other uses have been investigated such as retail, employment and services as alternatives to some permitted residential schemes .

3.8 A significant proportion of the extant planning permissions for high density City Centre schemes will have been granted at the height of what is now clearly acknowledged as an unsustainable housing market bubble. It is quite clear that housing market conditions will not return to the state they were in during the first three quarters of 2007 for some considerable time. It is reasonable to assume that such conditions will not be repeated again for a very long time, if ever, particularly in the context of cities like Coventry. Indeed, it is part of the Government's rationale for improving overall housing supply that unsustainable peaks of activity in the housing market are avoided in the future. As such therefore we contend that it is unsound to rely on all of the 1,190 dwellings in extant City Centre permissions coming forward in the period to 2026. A more rigorous analysis of the schemes themselves would we believe probably result in a very significant discount being considered appropriate. However, we believe that it is reasonable as part of a sound evidence base to assume at least a 20% discount of this particular category of planning permissions. This would amount to a figure of 235 dwellings, and reduce the overall figure for full and outline planning permissions to 2,325 dwellings. We consider that this approach to discounting some of the supply from extant City Centre planning permissions is very conservative and the minimum necessary to render this element of the evidence sound.

Officer Recommendation

No change.

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2193** Representation in regard to : **6.30**

Verbatim Submission

On the basis of our representations in relation to Table 2, in order for the Core Strategy to be sound, Paragraph 6.30 should be written to reflect an appropriate position with regard to existing housing supply. In addition, Paragraph 6.31 and 6.32 represent an unsound approach to spatial priorities for the delivery of housing in Coventry. It is clear from the Council's own evidence contained in the SHLAA, Table 6, page 24, that when sources of supply which it would be unsound to rely on are removed, Coventry City cannot demonstrate a 5 year supply of deliverable sites, nor a 10 year supply of developable sites. Without appropriate amendment therefore, the Core Strategy is unsound as it is unjustified not being supported by a robust and credible evidence base. It is also not effective as it will lead to a failure to deliver the required housing supply and is inflexible with regard to a continuous supply of housing sites. It is unsound to constrain the release of greenfield and Green Belt land identified as sources of supply to meet the overall housing requirement in Coventry or to suggest that such sites should be phased to later (although unspecified) phases of the plan period . This approach is unjustified, ineffective and inconsistent with national policy. It is of course recognised that Coventry City Council will not be able to identify sufficient land within its own City boundaries to meet the emerging RSS requirement of 33,500 net new dwellings to 2026. However, where it is within the remit of the Core Strategy to identify housing supply to move as close as possible to meeting this requirement within the City's boundaries, it is essential that it does so on the basis of robust and reliable evidence, in a way which will lead to the effective delivery of housing in a flexible manner, and is consistent with national policy. It is clear that without the early release of greenfield and Green Belt locations in the Plan Period, Coventry will not be able to identify either a 5 year supply of deliverable sites or a 10 year supply of developable sites.

In relation to Green Belt sites, Table 6 on Page 24 of the Council's SHLAA indicates that these are assumed to deliver 2,310 dwellings in the period 2018 to 2023 and 1,400 dwellings in the period 2023 to 2026. This represents an annual rate over this 8 year period of around 469 dwellings. Of the Green Belt sources of supply identified by Coventry City Council, the Core Strategy assumes that 3,000 will be provided at the Keresley Sustainable Urban Extension. If it is assumed that the Keresley Sustainable Urban Extension delivers housing evenly over this 8 year period, this will represent a rate of supply of 375 dwellings per annum. Even allowing for development activity starting in 2 or 3 different locations this still represents a very ambitious delivery rate.

We contend that it is absolutely clear that the Keresley Sustainable Urban Extension will be required in order for Coventry to deliver within its boundaries, its proportion of the 33,500 housing requirement. It is also clear that delivery of dwellings from the Keresley Sustainable Urban Extension will be required from the outset of the plan period . There should be no delay in bringing forward this site .

Officer Recommendation

No change.

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2194** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

3.18 This policy as currently drafted is unsound, as it is not founded on a robust and reliable evidence base, is not effective as it renders the Core Strategy undeliverable and inflexible, and is inconsistent with national planning policy in PPS3. In the first section of the policy, the reference to Safeguarded Land should be removed. We refer later in these representations to the issue of "safeguarded" land. The second section of the policy commencing "the release of land. .." should be deleted. The key requirement of Policy SG6 is, in accordance with PPS3, to provide the basis for the delivery of housing provision to meet the emerging RSS requirement, and to enable continuous delivery of housing for at least 15 years from the date of adoption of the Core Strategy. The housing requirement set out in the emerging RSS is an ambitious target for Coventry, and by our reasonable calculation referred to earlier, land will need to be identified in the Green Belt in Nuneaton and Bedworth and Warwick Districts, immediately adjoining Coventry, to accommodate in the order of 12,000 net new dwellings to 2026. In such circumstances, it is unsound to seek to delay the proper identification of sites which are deliverable and developable and which can meet that element of the overall RSS requirement which can be identified within the City Council boundaries. Delaying the proper identification of sites and failing to bring forward housing in a timely manner within the boundaries of Coventry will lead to unacceptable uncertainty in respect of the emerging Local Development Framework Documents in adjoining Districts.

3.19 The third section of Policy SG6 should be deleted as it is unsound. It is clear from the Council's own evidence that a 5 year supply of deliverable housing sites cannot be identified within the existing built up area or on greenfield sites outside the Green Belt. Only with the early release of Green Belt sites, including the Keresley Sustainable Urban Extension, can Coventry City Council demonstrate that it can identify sufficient specific deliverable sites to meet housing requirements in the first 5 years of the remaining plan period, and sufficient specific developable sites for Years 6 to 10.

3.20 Policy SG6 should be re-worded such that it is recognised that housing development will be delivered on a range of sites throughout the City, including in strategic regeneration areas, on allocated brownfield and greenfield sites, on smaller sites identified in the SHLAA, and on sites released from the Green Belt in sustainable locations, including the Keresley Sustainable Urban Extension.

Officer Recommendation

No change.

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2195** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

As currently drafted, Policy SG7 is unsound . Table 3: Allocated Housing Sites contains a reference in relation to Sites 31 to 36 to "safeguarded land". We set out clearly later in these representations, in relation to the Green Belt, why we consider the use of the term "safeguarded land" to be unsound. In terms of the 6 sites identified as forming a part of Coventry's housing supply to 2026, it would be sufficient in Table 3 to simply identify these sites as "land removed from the Green Belt". This alteration is necessary to enable the location and scale of housing development which can be met within the City's boundaries to be properly identified and planned without uncertainty. The failure to allocate sites that have been properly identified through the SHLAA process and through the development of the Core Strategy would undermine delivery of housing.

3.22 The Keresley Sustainable Urban Extension (Eco-Suburb) , Site 31 from Table 3 should be identified as a strategic allocation in accordance with Paragraphs 4.6 and 4.7 of PPS12. The delivery of housing at the Keresley Sustainable Urban Extension is central to the achievement of the Spatial Strategy in the Core Strategy. In accordance with Paragraph 4.7 of PPS12 it is considered that the boundaries of the proposed strategic allocation at the Keresley Sustainable Urban Extension are as identified on Plan A attached to this representation.

Detailed proposals for a revised Green Belt boundary in the Keresley area, in order to accommodate the Sustainable Urban Extension are proposed in our representations . They are fully justified, being based on substantive evidence, and accord with Paragraph 2.9 of PPG2. In contrast, the boundaries proposed on the proposed submission Proposals Map by Coventry City Council appear arbitrary, do not reflect features on the ground, are based on a notional boundary of an as yet undefined "country park", and in many instances are simply lines through the middle of existing fields . Defining the strategic allocation to accommodate the Keresley Sustainable Urban Extension in this manner is unsound. The City Council have produced no evidence to justify the boundaries proposed, and they would prejudice the emergence of a properly masterplanned approach to the development of a Sustainable Urban Extension, on the basis of detailed evidence and analysis of the site and public consultation.

Officer Recommendation

Minor change. Table 3, amend 4th title to read 'Reserved Land'

Representation number: **2196** Representation in regard to : **Proposals Map**

Verbatim Submission

The identification of the Keresley Sustainable Urban Extension (Eco-Suburb) as identified on the proposed submission Proposals Map is unsound . The Keresley Sustainable Urban Extension will necessitate a revision to Green Belt boundaries. It is clear, in the terms set out in PPG2, that exceptional circumstances exist by virtue of the emerging RSS housing requirement, work undertaken in Coventry on its SHLAA, and acknowledgement both in the emerging RSS and the Core Strategy itself that the release of land from the Green Belt to accommodate development will be necessary. PPG2 contains clear guidance in relation to the nature of Green Belt boundaries, and in particular Paragraph 2.9 states: "Wherever practicable a Green Belt should be several miles wide, so as to ensure an appreciable open zone around the built up area concerned. Boundaries should be clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edges where possible. Well-defined long-term Green Belt boundaries help to ensure the future agricultural, recreational and amenity value of Green Belt land, whereas less secure boundaries would make it more difficult for farmers and other landowners to maintain and improve their land".

Officer Recommendation

No change

Representation number: **2197** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

We have previously expressed our view that phasing or withholding the release of sites contained in Table 3 from the Core Strategy is unsound. Paragraph 6.37 and Policy SG8 should be deleted as they are unjustified, ineffective and not in accordance with national planning policy.

Officer Recommendation

No change.

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2198** Representation in regard to : **6.38**

Verbatim Submission

3.30 The supporting evidence submitted as part of these representations clearly demonstrates that the Keresley Sustainable Urban Extension (Eco-Suburb) is being progressed in accordance with best practice in relation to the delivery of sustainable growth. However, it is the case that all new development should be progressed in accordance with key principles of sustainability, and in particular in relation to transport, climate change and green infrastructure. It is therefore our contention that the Keresley Sustainable Urban Extension should not be singled out in the way envisaged in the Core Strategy and that this approach is unsound.

3.31 In particular, Paragraph 6.38 refers to the Government proposals for Eco-Towns suggesting a relationship with the Keresley Sustainable Urban Extension, which it terms an "eco-suburb". This approach is unjustified, as no evidence has been submitted which supports the notion of an exemplar "eco-suburb" or demonstrates how the Government's proposal for free standing settlements in any way relates to Sustainable Urban Extensions. At Paragraph 6.40 the Core Strategy refers to the draft planning policy statement for eco-towns. Using this document in an arbitrary and unjustified way as a basis for proposals set out under Paragraph 6.40 is unsound. By virtue of the fact that the PPS for eco-towns is draft, and in any event intended to apply to the wholly different circumstance of new settlements, any reliance on it would be unsound by virtue of being inconsistent with national planning policy.

3.32 In the supporting evidence submitted as part of these representations we have set out ways in which the Keresley Sustainable Urban Extension will use best practice, within the constraints of viability, to deliver sustainable development. However, we believe it is unsound to suggest strict requirements which should apply to the development, as currently set out under Paragraph 6.40, and which exceed currently published national requirements, for example in relation to zero carbon development, Level 4 Code for Sustainable Homes, Building for Life silver standard, and requirements for a minimum of 40% of land allocated to public open space. The level of detail set out under Paragraph 6.40 is unjustified, as Coventry City Council has produced no evidence to support these onerous requirements. The evidence we have submitted as part of these representations indicates that very good progress is being made to develop plans for a Sustainable Urban Extension, and this progress is illustrated by the emerging Framework Plan, which illustrates how sustainable development can be achieved in the area. However, we would wish to discuss these emerging proposals in much more detail with a range of stakeholders, including Coventry City Council and local communities, and the results of these discussions should not be pre-empted or prejudiced by onerous and restrictive policies, which are unjustified and could undermine the delivery and flexibility of this essential scheme.

Officer Recommendation No change.

Representation number: **2199** Representation in regard to : **Policy SG 9: Keresley Eco-suburb**

Verbatim Submission

The policy as worded is unjustified, ineffective and inconsistent with national planning policy. It is therefore unsound, and should be deleted. The re-worded paragraph we have suggested will be an appropriate replacement for Policy SG9.

Officer Recommendation Minor change. At end of second paragraph, insert sentence to read: "The Eco Suburb will be comprehensively master-planned and implemented on a co-ordinated basis."

Representation number: **2200** Representation in regard to : **6.47**

Verbatim Submission

Paragraph 6.47 refers to "preliminary Viability assessments" of sites which support a 25% affordable housing requirement. This evidence does not appear to be available from the City Council.

Officer Recommendation No change.

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2201** Representation in regard to : **Policy SG 10: Housing Needs and Mix**

Verbatim Submission

As currently drafted, the second section of Policy SG10, which sets a "target requirement" of 25% affordable housing is unsound. It is not supported by a credible and robust evidence base, in particular it does not address the requirement set out in PPS3 at paragraph 29 that an assessment of economic viability should be used to inform the proposed target. Further to the Blyth Valley judgement it is unsound to include a policy with a requirement for a specific proportion of affordable housing on new schemes where evidence on economic viability is not available. Policy SG10 also refers to a requirement for 10% "executive" homes on all residential schemes of 50 or more dwellings or more than 2 hectares. Whilst we support the aspirations of the City Council in delivering a broad mix of housing types, there is no proper definition of what constitutes an " executive" home in this context.

Officer Recommendation

Minor change. Insert into glossary
"Executive Homes -
Likely to be owner-occupied, detached homes, with 4 or more bedrooms and in council tax bands G & H"

Representation number: **2202** Representation in regard to : **7.21**

Verbatim Submission

Text at Paragraph 7.21 of the Core Strategy is wrong not to point out that national planning policy with regard to Green Belts, PPG2 would no longer facilitate the designation of green wedges as Green Belt . In this context it is unsound, as it is inconsistent with national planning policy. This is of particular relevance as the Core Strategy elsewhere seeks to designate further areas of land within the urban area as Green Belt, contrary to PPG2.

Officer Recommendation

No change.

Representation number: **2203** Representation in regard to : **7.23**

Verbatim Submission

This paragraph is broadly accurate in reflecting progress that the City Council has made in concluding that exceptional circumstances exist that necessitate revisions to the Green Belt boundary. However, it is unjustified and inconsistent with national planning policy to refer to the strategic locations where land should be removed from the Green Belt as being to meet "longer term" housing and employment needs. The available evidence, in particular with regard to the availability of housing land and the need to ensure a continuous supply of deliverable and developable housing sites, is unequivocal in concluding that the Keresley Sustainable Urban Extension (Eco-suburb), and the other Green Belt sites in Table 3, should be identified as housing allocations that are needed for development within the Plan Period.

Officer Recommendation

Minor change.
Amend first sentence to read: "Areas identified as potential urban extensions will be considered as reserved, unless and until it can be shown that,"

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2204** Representation in regard to : **7.24**

Verbatim Submission

This paragraph, and the approach of identifying potential urban extensions as "safeguarded land" is wrong and unsound. It is not appropriate to refer to the sites which have been identified as locations which must come forward for development in order to enable Coventry to meet as much as possible of the emerging RSS housing requirement, as "safeguarded land". Safeguarded land as defined in PPG2 at Paragraph 2.12 and Annex B is intended to be land that will not be required until beyond the plan period, in this case beyond 2026. The designation of safeguarded land is therefore wholly inappropriate and unsound, being unjustified, ineffective and inconsistent with national planning policy.

The Core Strategy in its references to the role that Sites 31 to 36 from Table 3 must play in meeting housing requirements is fundamentally inconsistent. In a number of places it correctly refers to these sites as forming the necessary part of the overall housing land supply, for example Paragraph 5.12, Table 2 and Paragraph 6.30, whereas elsewhere it continues to refer to them as "safeguarded land" only to be released at some ill-defined later part of the plan period. These inconsistencies are a fundamental flaw, and render the Core Strategy unsound as presently drafted.

In terms of Paragraph 7.24, it is somewhat disingenuous and avoids making proper provision for housing and other development requirements for the plan period to 2026 to continually make reference to land which has been identified as being deliverable, developable and in suitable and sustainable locations and which should be removed from the Green Belt as somehow held in reserve, "safeguarded" to be released to meet possible longer term development needs. These sites are not "safeguarded land" in the terms of PPG2, and it is unsound to continue to so refer to them. They should be properly identified as allocations in the Core Strategy, with appropriate robust and defensible long term Green Belt boundaries re-defined on the proposals map.

Officer Recommendation

Minor change. Amend first sentence to read: "Areas identified as potential urban extensions will be considered as reserved, unless and until it can be shown that,"

Representation number: **2205** Representation in regard to : **7.25**

Verbatim Submission

This paragraph is unsound, and should be deleted. It refers to the Keresley Sustainable Urban Extension as an exemplar eco-suburb, something which is aspirational and not justified by robust evidence or any consideration of viability. It refers to detail of a "Green Belt Country Park" which has no evidential support or backing and is therefore not justified. It proposes re-defining the Green Belt boundary to include "green linkages" which are defined without proper reference to defensible long term Green Belt boundaries, including in some instances notional lines through the middle of existing fields. This approach to the Green Belt, and the references to the Keresley Sustainable Urban Extension are unsound as they are not justified, ineffective and not consistent with national planning policy, in particular PPG2.

Whilst it is acknowledged that historically areas of Green Belt have been designated in Coventry on the basis of their value as green wedges and linkages through the urban area, these pre-date the publication of PPG2 in 1995. PPG2 represents clear and settled Government policy, supported by a significant body of case law, and therefore any development plan proposals with regard to Green Belt should be in conformity with, and consistent with PPG2. Coventry's proposals through the Core Strategy to designate further areas of green wedges and green linkages within the urban area do not accord with PPG2, are inconsistent therefore with national planning policy, and unsound. No evidence has been put forward to suggest why the Core Strategy should be allowed to depart so profoundly from national planning policy in PPG2 in this way. In particular PPG2 is clear in Paragraph 1.4 about the fundamental aim of Green Belt policy and its most important attribute, namely openness. It is clear at Paragraph 1.5 that there are five purposes of including land in Green Belts and at Paragraph 1.7 PPS2 reiterates that the quality of landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection. PPG2 is also clear at Paragraphs 2.6 to 2.10 about the nature of Green Belt boundaries. The Core Strategy cannot be used to promote the designation of Green Belt along lines which are now historic and are not consistent with national planning policy. To do so is unsound.

Officer Recommendation

No change.

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2206** Representation in regard to : **7.33**

Verbatim Submission

With the exception of the former area of Green Belt north of the Jaguar factory off Browns Lane, all the other areas of proposed Green Belt are inconsistent with national planning policy in PPG2 and should not be designated as Green Belt. The Core Strategy is unsound in this regard.

Officer Recommendation No change.

Representation number: **2207** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

The second part of this policy refers to "safeguarded land" and is an inappropriate and unsound way of designating the six sites which should be included as housing allocations in Table 3. The use of the term "safeguarded land", as set out previously, is unsound.

The second, third and fourth sections of Policy EQ2 commencing with the words "land in the following..." and ending with "... Ancient Arden landscape." should be deleted. Their inclusion is unjustified, ineffective and inconsistent with national planning policy, especially PPS2. The ninth section of Policy EQ2, commencing "areas where Green Belt designation is proposed:" is unsound and should be re-written to exclude reference to the Eastern Green, Keresley Green, and Potters Green corridors. The proposal to designate these areas as Green Belt is not in accordance with PPG2.

Officer Recommendation Minor change. Amend second paragraph of EQ2 to read "... in the interim as reserved"

Representation number: **2208** Representation in regard to : **7.34**

Verbatim Submission

We support the green infrastructure approach adopted more widely in the West Midlands and proposed in Coventry. This is an appropriate, and sound way of including policies relating to green space within the urban area. In particular, in relation to the Keresley Sustainable Urban Extension, the use of a designation green infrastructure is an appropriate way of referring to the development of open space resources in this proposal, on the basis of a masterplanned approach to the delivery of this development, as suggested in our proposed re-wording of Paragraph 6.38.

Officer Recommendation Support welcomed.

Representation number: **2209** Representation in regard to : **7.41**

Verbatim Submission

Whilst we generally support the typology of parks, open space, outdoor sports and recreation facilities set out in these Paragraphs, we find the reference to recommended minimum standards unsound. Information available from Coventry City Council does not include what we consider to be appropriate in terms of PPG17 as a basis for setting these onerous space requirements. We believe the quantity of open space required as set out in Paragraphs 7.44 to 7.48 is not founded on a robust evidence base and therefore not justified, and is inconsistent with national planning policy set out in PPG17. In particular, it appears that there is significant double counting of open space requirements. For example, whilst it seems reasonable to suggest recommended standards of 1.36 hectares per 1,000 population for outdoor sports, it is quite conceivable that this can be accommodated in a new park, and the requirement therefore should not be in addition to the 3.13 hectares of open space set out under Paragraph 7.44. In addition, no account is taken in these recommended minimum standards of existing levels of provision which might exist within a particular area of the City, and therefore they do not properly reflect local circumstances by way of a PPG17 audit.

Officer Recommendation Para 7.43 Minor change. Insert new sentence after fourth sentence to read "The same Green Space can sometimes contribute to more than one category in the Standards. "

Keresley

Representor number **REP-1145**

Representor : **Queens College, Cala Bluemark**

Company: **Queens College, Oxford; Bluemark Development; Cala Homes**

Agent Details Company: **Pegasus Planning Group**

Contact: Chris May

Representation number: **2210** Representation in regard to : **Policy IM 1: Developer Contributions for Infrastructure**

Verbatim Submission

Reference in the third paragraph of Policy IM1 to the "eco-suburb" at Keresley and the potential for the Council to consider "in-kind contributions" is unsound. There is no justification for this reference, which is unclear in its meaning and scope, and it should be deleted. The reference in the second bullet point of the final section of Policy IM1 to executive housing will need careful definition and consideration in order for the policy to be rendered sound.

Officer Recommendation

Minor change. Insert into glossary

"Executive Homes -

Likely to be owner-occupied, detached homes, with 4 or more bedrooms and in council tax bands G & H"

Representation number: **2211** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

We believe it is an anomalous and thoroughly unhelpful situation, presumably not envisaged when the 2004 Act was brought into effect, that policies "saved" by the Secretary of State after September 2007 can now only be replaced expressly by new development plan policies. On the basis of the table contained at Appendix 1, there will therefore be a range of policies from the Coventry Development Plan which will remain in force alongside the proposed Core Strategy, and any other subsequent Development Plan Documents unless expressly replaced by them. At the very least, this seems a thoroughly confusing and over-complicated situation, particularly confusing to members of the public trying to negotiate their way through the planning system.

In the interests of their citizens, and those who have to use the planning system in Coventry, the City Council is urged to consider whether it would be preferable to simplify the development plan as it applies in Coventry by avoiding saved policies from the Coventry Development Plan existing indefinitely seemingly without the opportunity for further formal review or examination.

Officer Recommendation

Minor change appendix 1:

OS8 & OS9 Insert SG1 in "Superseded by" column, delete "X" from "Saved" column

EM5 Delete SG1 and replace with SG2

EM6 - EM8 Insert SG1 in "Superseded by" column, delete "X" from "Saved" column

EM12 & EM13 Insert SG3 in "Superseded by" column, delete "X" from "Saved" column

H9 Insert SG7 in "Superseded by" column, delete "X" from "Saved" column

H11 Insert SG10 in "Superseded by" column, delete "X" from "Saved" column

H13 Insert SG10 in "Superseded by" column, delete "X" from "Saved" column

E4 Insert SG14 in "Superseded by" column, delete "X" from "Saved" column

E5 Insert SG17A in "Superseded by" column, delete "X" from "Saved" column

E9 Insert SG14 in "Superseded by" column, delete "X" from "Saved" column

E10 Insert SG16 in "Superseded by" column, delete "X" from "Saved" column

E11 Insert SG14 in "Superseded by" column, delete "X" from "Saved" column

E13 Insert SG14 in "Superseded by" column, delete "X" from "Saved" column

S3 Insert Spent in "Superseded by" column, delete "X" from "Saved" column

AM19 Insert 8.19 in "Superseded by" column, delete "X" from "Saved" column

BE16 Insert SG18A in "Superseded by" column, delete "X" from "Saved" column

BE17 Insert Spent in "Superseded by" column, delete "X" from "Saved" column

SCL6 Insert EQ2, SG7, IM1, SC1 in "Superseded by" column, delete "X" from "Saved" column

SCL7 Insert EQ2, SG7, IM1, SC1 in "Superseded by" column, delete "X" from "Saved" column

Land East of Watery Lane

Representor number **REP-1088**

Representor : **Key Landowner**

Company: **Key Landowner**

Agent Details Company: **Martin Robeson Planning Practice**

Contact: Mr P Thomas

Representation number: **2023** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

Policy EQ2: Green Belt

1. Land safeguarded from the Green Belt for development in the City's "Proposed Submission" will be an essential component of the City's housing supply for both the first 5 year period and beyond, if the City is to meet its annual housing targets set by the emerging RSS (see our Representations to Policy SG6.

2. In releasing such sites the Core Strategy must follow an evidence based approach to housing provision. As directed by the RSS, a Sub-Regional Green Belt Review (January 2009) has now been undertaken by the joint authorities which reinforces, to a large extent, the findings of Coventry City Council's Green Belt Review (December 2007). The purpose of the Reviews were to determine the most sustainable and appropriate locations for development in the Green Belt in and around Coventry and therefore the Strategy should prioritise those sites which performed best against the Green Belt Reviews for development. These sites are now safeguarded in the "Proposed Submission".

3. These are sites which relate well to the existing built up area of Coventry, perform the least Green Belt roles and are easily integrated with existing road patterns and facilities. Such sites reflect sustainable development principles by making effective use of existing infrastructure and available investment. "Land to the East of Watery Lane" at Keresley is one such example.

4. The Coventry Green Belt Review (2007) found that:

"To the east of Bennett's Road the impact of development would relate much better [in comparison to land west of Bennett's Road] with the existing built up area of Keresley and provide the potential for a significant release of land which, like the area immediately north of Sandpits Lane, could be relatively easily integrated with the existing road pattern and facilities" (paragraph 4.3.4).

5. This is confirmed in the Sub Regional Green Belt Review, as the parcel of land came 3rd in the hierarchy of identified sites, scoring only 5 points.

6. This land is available and suitable for development and achievable. The land has qualitative advantages of being able to deliver the executive homes being sought by the Council to retain higher end workers in Coventry and can form part of a wider release and is physically distinct from "Land West of Bennetts Road".

7. Developing sites such as Land East of Watery Lane effectively, will relieve the requirement to develop more open Green Belt land which have wider roles such as preserving the setting of Coventry and checking the unrestricted sprawl of the City. We therefore support the "Safeguarded Land" allocation on Land East of Watery Lane, as the site's development will form an essential component of Coventry's housing supply in the early plan period.

Officer Recommendation

No change.

Land East of Watery Lane

Representor number **REP-1088**

Representor : **Key Landowner**

Company: **Key Landowner**

Agent Details Company: **Martin Robeson Planning Practice**

Contact: Mr P Thomas

Representation number: **2024** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

Policy SG6: Location and Scale of Housing Development

1. The RSS housing requirement for Coventry to 2026 represents a 193% increase on the average annual completion rate within Coventry over the last 10 years? However this housing requirement needs to take into account the shortfall in historic housing completion rates in Coventry, against the RPG 11 target to 2006, and the recent completion rates in 2006/7 and 2007/8 which have fallen short of the emerging RSS target". As a result the housing requirement for 2008-2026 increases to 32,888 new dwellings to take account of the historic shortfalls. Coventry therefore has an annual housing target of 1,827 new dwellings per annum, a 220% increase on Coventry's average completion rate over the last 10 years. This represents a very substantial increase over recent achievement.

2. This step change to housing provision in Coventry is essential in helping to deliver Coventry's role as a "New Growth Point (paragraph 3.41, RSS) and as a focus for growth in the "North-South Corridor" regeneration area (paragraph 3.42, RSS).

3. The Core Strategy must therefore adopt the most appropriate strategy for addressing current and future demand in the City taking into account evidence from the Strategic Housing Land Availability Assessment (SHLAA) (March 2009). The SHLAA identifies a supply of housing for the first 5 years (2008-2013) but fails to identify sufficient sites for the remaining plan period (2013-2006).

4. However it is questionable whether this first 5 year supply is "deliverable", as required by PPS3, given the over reliance on the contribution from empty homes (600 dwellings) and the assumptions that all sites identified in the SHLAA with short term availability will be granted planning permission for housing and that all planning permissions will come forward. There are competing needs for brownfield sites and in some circumstances residential development may not be the most suitable use".

For example, housing development on existing employment sites would exacerbate existing employment problems and lead to unsustainable growth by displacing employment sites into more peripheral areas,

5. The RSS proposed annual completion rate is 1,675 new dwellings (net) whilst the average annual completion rate for Coventry over the last 10 years is 571 new dwellings (net).

8 RPG11 set a requirement for 8,822 new dwellings in Coventry for 1997-2011. On the basis of a requirement for 630 dwellings per year, the total requirement for Coventry up to 2006 was 5,670.

In this period Coventry only delivered 4,169 dwellings resulting in a shortfall of 1,501 dwellings. In addition the completion rates in Coventry in 2006/7 (1,010) and 2007/8 (1,103) fell short of the emerging RSS target of 1,675 new dwellings per annum. This results in a shortfall of 1,104 new dwellings. These shortfalls total 2,605 which must be added to the RSS remaining requirement 2008-2026.

9 For example a housing development at the Warehouse/Factory, Lythalls Lane might displace employment provision. increasing journey to work distances and restricting accessibility to employment opportunities. This would create a less sustainable and equitable living environment. Given these shortcomings it is evident that there is not a deliverable housing supply in Coventry for the next 5 years.

5. A further issue with the "deliverable" five year supply is that a total of 4,888 dwellings are categorised as Allocated Sites within the Proposed Submission Core Strategy Development. However, the Core Strategy is yet to be independently assessed by an Inspector and therefore it is not certain that these sites will be available, suitable and achievable by 2013.

6. In this current economic climate it is all the more important that there is a continuous five year supply of deliverable sites to ensure a range of housing developments are completed to attract earners and new

Officer Recommendation

No change.

Land rear of Orchard Retail Park

Representor number **REP-1004**

Representor : **Mondial**

Agent Details Company: **Barton Willmore**

Company: **Mondial Investments LTD**

Contact: John Pearce

Representation number: **1717** Representation in regard to : **Policy SG 14 : Overall Economy and Employment Strategy**

Verbatim Submission

1. We support the requirement within the policy to maintain a minimum of 82 hectares of land for employment development. The supporting text to the policy at paragraph 6.72 indicates that where minimum reservoir sites are developed it will be necessary to allocate and/or safeguard new sites and additional land to maintain the reservoir of readily available sites in the city or to request to the districts of Rugby, Warwick and Nuneaton and Bedworth to consider making further provision on the edge of Coventry in their Core Strategies.

2. The justification for needing to allocate and identify additional sites for employment development can be found in the Council's latest Annual Monitoring Report produced in 2007 which indicates that there is a readily available supply of employment land of only 48.5 hectares. Comparing this against the emerging RSS five year requirement for the City of 82 hectares, this represents less than 3 years supply.

3. The Annual Monitoring Report demonstrates that there is not a five year supply of employment land within the City and as such alternatives need to be sought in order to meet the RSS requirements. The allocations now included within the Core Strategy would meet the rolling five year supply of employment land but we contend that future directions of growth should be identified within the Core Strategy to direct new employment development in the second five year period i.e; 5 - 10 years time and beyond.

Officer Recommendation

Insert new paragraph 6.74A following 6.74 to read: "On 31st March 2008, the supply of employment land with planning permission (including those under construction) in Coventry was 36.26 hectares. In accordance with Footnote d to Draft RSS Policy PA6A - Employment Land Provision - 39.28 hectares at former Peugeot Ryton should also be included within Coventry's 'readily available' land supply because it has planning permission that is currently under construction. The requirements of the 82 hectare 'minimum reservoir' have therefore been met. As these sites are developed out, allocated sites set out in Table 4: Employment and Mixed-Use Allocations can move into the minimum reservoir. The allocated sites may be treated as readily available, but the reserve sites within the Keresley Eco-Suburb are not readily available until such time as planning permission has been granted for their development."

Representation number: **1718** Representation in regard to : **6.73**

Verbatim Submission

We support where the paragraph states that due to the lack of supply of readily available sites within the city it will not always be possible to prioritise brown field sites. In such instances where the lack of previously developed sites would prevent the delivery of employment land it should be made dear that safeguarded or Green Belt could be released to maintain a five year supply and to meet Coventry's needs if required.

Officer Recommendation

Minor change. Following the Sub-Total relating to Mixed-Use Allocations, insert to read:
"Reserve Sites
13. Keresley Eco-suburb Sub-Regional 11.0 11.0 Amend Grand Total figures to read 124.04 and 84.50
Insert new column before "Area (Hectares)" to be entitled "RELS Classification*" and insert "Good Quality" in this column for all sites except for site 7 (Jaguar Brown's Lane) for which "Sub-Regional" should be inserted. Insert at the foot of the table: "**Good Quality sites are those between 0.4 and 10.0 hectares. Sub-Regional sites are those of more than 10.0 hectares. The classification relates to the B1/B2/B8 element of the total sites area."

Land rear of Orchard Retail Park

Representor number **REP-1004**

Representor : **Mondial**

Company: **Mondial Investments LTD**

Agent Details Company: **Barton Willmore**

Contact: John Pearce

Representation number: **1719** Representation in regard to : **Policy SG 15 : Provision of Employment Land and Premises**

Verbatim Submission

The policy states that a five year rolling supply of 82 hectares of employment land will be required to be available at all times and that this will be achieved by using recycled land and allocated specific sites. As such we support the allocation of 2.74 hectares of land east of Orchard Retail Park (Site 1) for this purpose.

11. The total amount of land that is allocated for employment purposes in Table 4 is 113.04 hectares the minimum of which totalling 74.50 hectares should be developed for employment purposes (Class B1, B2 and B8). If only the minimum amount of employment development was provided this would be less than the RSS requirement of 82 hectares and would represent a shortfall of 7.5 hectares.

The policy is not clear on what timescale the allocations relate to. Are these for the first five years of supply as set against the RSS requirement? If so, what happens after five years? The Core Strategy should identify directions of growth to accommodate future levels of development. In Coventry's case, as not all future employment development will be able to be accommodated Within the City's boundaries we suggest that the council identify cross boundary general directions of growth, one of which we propose should be to the south east of Coventry in the vicinity of the Tollbar Island located within Rugby Borough.

The findings of the Joint Green Belt Study prepared by Coventry City, Nuneaton and Bedworth Borough, Rugby Borough and Warwick District conclude that the suggested area of growth (site C15a of the Joint Green Belt Study) performs poorly against the reasons for identifying land as Green Belt in the first place and that it would be suitable for further investigation to determine its potential to accommodate new employment or residential development. Whilst it is accepted that Coventry cannot allocate or identify land for development in an adjoining authority, the identification of directions of growth by the Council would serve as a starting point for cross boundary working with adjoining authorities in the production of their Core Strategy's.

Officer Recommendation No change

Representation number: **1720** Representation in regard to : **Table 4: Employment and Mixed-Use Allocations**

Verbatim Submission

We support the allocation of 2.74 hectares of land east of Orchard Retail Park for Class B1, B2 and B8 uses.

Officer Recommendation Support welcomed.

Representation number: **1831** Representation in regard to : **Proposals Map**

Verbatim Submission

We object to the omission from the Core Strategy of the balance of our client's the east of the Orchard Retail Park. A site plan is submitted that identifies the been allocated and that which is omitted.

The land that has been omitted is currently identified within the Coventry Development a Coventry Nature Conservation Site (CNCS). Further representations are submitted objecting to this designation Within these representations.

The technical studies that have been completed to support the current planning application that has been submitted on this part of the site demonstrate that the site is suitable for development and that there are no technical constraints that would prevent delivery of the site. As such we conclude that the site is available for development and would contribute approximately 3. hectares of additional employment land towards meeting Coventry's requirements, We propose that the balance of the site should be allocated for employment purposes (Class B1, B2 and B8).

We object to the area of land located between the proposed employment allocation at land east of Orchard Retail Park (Site 1) and Willenhall Wood being designated on the Proposals Map as an Existing Local Wildlife or Geological Site. Recent work undertaken on behalf Mondial Investments Ltd at the site has indicated that the CNCS designation that the meadow area is currently subject to is no longer appropriate due to the deterioration of site. It is our belief that the site no longer demonstrates the same ecological or nature conservation characteristics that resulted in the site being designated in the first place and that as a result we request that the CNCS designation is removed.

Officer Recommendation No change.

Lentons Lane

Representor number **REP-1038**

Representor : **Ms Maureen Nolan**

Representation number: **1852** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

I'm writing on behalf of my mother Maureen Nolan of the above address, who is currently in hospital. I apologise for the lateness of this letter but I understood the above land had been removed from the draft plan. Following a telephone conversation with a member of your staff on Friday I'm no longer sure if that is the case. I'm therefore sending this letter on my mothers behalf, as she is currently unable to do so, in case the matter has not been resolved. The land in question is in the Green Belt, which is the strongest presumption against development and we would like to know if all the brown field sites and areas of restraint have been allocated before you start removing land from the Green Belt.

The land is an amenity value for many residents of the city who have no green space to enjoy, and who therefore travel to this area for the benefit's the countryside provides. I believe the land is also home to great crested

newts so their habitat cannot be disturbed. I grew up in this property and we always understood the land was unsuitable for development because of the type and extent of mining which has taken place in the past. Finally, we feel that there are insufficient local amenities to sustain extra development in the area. There are no local shops, doctors, dentists, or sufficient school places and public transport to support extra residents in the area.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representor number **REP-1140**

Representor : **Michael and Dove Campisi**

Representation number: **2152** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

I am writing to you regarding the proposals for Lentons Lane green belt to be included in the Core Strategy for reallocation to 'safeguarded' land. I, as practically all of the residents, feel extremely unhappy about this proposal. We have many reasons to want this site to be removed from the Strategy before it is submitted.

The first reason is that we feel the council has not been as open as it should have been with us regarding the site. Your policy says that it should "help make the planning system transparent, by making plans easily understood and accessible to all." However we have found it very hard to find information and then to understand it. Your policy also states that the planning should be "proactive by combining the knowledge of residents and planners to provide grater foresight in anticipating and satisfying future needs for planning policy". We were not approached as a community about the green belt which makes us feel our thoughts and knowledge were not and are not taken into consideration or valued in providing foresight. Participation from us to make our views known has not been promoted, clearly or even at all. If policies had been followed we would not be in this position of finding out about the plans at such a late stage in the Strategy and would have been able to express views and objections at an earlier stage.

Your policy states that the site needs to be sound. This means that it needs to be justified therefore the most appropriate strategy when considered against reasonable alternatives and have solid/credible reasons of why it's being considered. This does not appear to be the case with Lentons Lane because: alternative sites to green belts do not seem to have been considered, the core Strategy has not been built upon the evidence base from the national policy and to allocate this land for residential development has not been justified. The reasons for saying this will now be explained.

Releasing this green belt would not be consistent or inline with national Policy. This is so because the national advice from Government is that green belts are only to be released under exceptional circumstances however in the Core Strategy no exceptional circumstances have been outlined. The Core Strategy is not in line with the most recent Green Belt study which advised retaining the land parcel C2, an area including Lentons Lane. This bring into question whether other non green belt sites have been considered which further questions whether releasing Lentons Lane green belt is justified.

The City's Growth Point Bid has aims to provide urban renaissance and growth so turning a green belt, on the edge of the city, into a site for homes is not compatible with this bid.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2215** Representation in regard to : **2.8**

Verbatim Submission

I would like to object to the release of land from the Green Belt at Lentons Lane (C2d), Coventry and the subsequent identification of the land as safeguarded for residential development. My initial objection is based upon deliverability of the site in light of information I have highlighted:

Please find below relevant information taken from the Mining Report I ordered for parcel C2d on 06 April 2009. Please also note that I spoke to Keith Pennington at the Coal Authority and he informed me that there would be tunnels joining the shafts to the Coal seam. He also said that shallow mining would have been done and due to the period of time in which it was practiced the records wouldn't show all the details regards this. We are dealing with a parcel of land that has had many methods of mining taking place on it, and in all eventualities this wouldn't all be documented and only discoverable at the development stage. As is highlighted in the extracts from the Mining Report below, records may be incomplete, and they do suggest caution for any future development plans. I would strongly urge this sites removal, as it is non deliverable. Ground Stability Report Site At, Lentons Lane, Coventry, West Midlands.

This report is based on and limited to the records in the possession of the Coal Authority; the records and geological interpretation of The British Geological Survey (BGS) and the records of the Cheshire Brine Subsidence Compensation Board, at the time the search is answered.

Coal mining Yes

Shrinkable clay Yes

Running sand Yes

Compressible deposits Yes

Collapsible deposits No

Landslide potential Yes

Soluble rocks No

Brine extraction No

Information from the Coal Authority

Underground Coal Mining Past

The property is in the likely zone of influence from workings in 3 seams of coal at 40m to 170m depth, and last worked in 1858.

Mine entries

Within, or within 20 metres of, the boundary of the property there are 6 mine entries. Coal Authority records disclose the following information: 436283-010. was capped by RSA in January 1989. 437283-002. No treatment details. 436283005.

No treatment details. 436283-003. No treatment details. 436283-013. No treatment details. 436283-006. No treatment details.

Records may be incomplete. Consequently, there may exist in the local area mine entries of which the Coal Authority has no knowledge. Comments on Coal Authority information In view of the mining circumstances a prudent developer would seek appropriate technical advice before any works are undertaken.

Therefore if development proposals are being considered, technical advice relating to both the investigation of coal and former coal mines and their treatment should be obtained before beginning work on site. All proposals should apply good engineering practice developed for mining areas. No development should be undertaken that intersects, disturbs or interferes with any coal or mines of coal without the permission of the Coal Authority. Developers should be aware that the investigation of coal seams/ former mines of coal may have the potential to generate and/or displace underground gases and these risks both under and adjacent to the development should be fully considered in developing any proposals. The need for effective measures to prevent gases entering into public properties either during investigation or after development also needs to be assessed and properly addressed. This is necessary due to the public safety implications of any development in these circumstances.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2216** Representation in regard to : **5.12**

Verbatim Submission

...cont

Information from the British Geological Survey on potential for natural ground movement:

Shrinkable Clay

The property is in an area underlain by clay. Clay can swell or shrink if the moisture content changes. The clay deposits in this area are considered to be mainly of "medium plasticity". Movement is unlikely to occur unless changes are made to the ground and/or vegetation, including those caused by drought or excessively wet weather.

Deposits which could compress the property is in an area underlain by natural compressible deposits. When this material is overloaded, or dries out, it can become unstable causing ground movement. Because of these compressible deposits, ground movement could occur.

Deposits which could collapse

The property is not in an area underlain by deposits which could collapse and cause ground movement.

Natural landslide activity

The property is in an area where the local geology and steepness of slope could combine to create the likelihood of landslide activity. However, landslide activity is unlikely to occur. However, you should consider the possible consequences before you:

- carry out any building or excavation work;
- alter the ground surface or drainage of surface or ground water; or
- plant or remove large shrubs or trees

Ground movement can cause uneven damage or subsidence to a property.

As we can see from the map attached (see diagram a) there are five known mine shafts on this whole parcel of land. The big dashed line shows the "in crop of nine feet seam". This is the coal seam; all the mineshafts would have had underground tunnels leading from them to this seam. All the shafts in turn would have had tunnels joining them. The map shows various depths of mining. It is also documented that coal seams are recognised as fault lines, especially heavily mined ones. There have been cases of seams collapsing in a domino fashion along its path, taking out roads, houses and bridges. This seam runs straight through this parcel.

I walked around the entire area with the farmer from Lentons Lane and I was able to see the impact that subsidence and mineshaft collapse has and still is causing to these fields. Along the route I was shown holes that had been back-filled with only soil over the years, still leaving large circular impressions in the ground. This whole area of land proposed is constantly moving and collapsing, subsidence is obvious once you look for it. This area was also mined for minerals, as well as for clay, I strongly suspect that this parcel contains more mine shafts than are shown here, and an interlocking mesh of underground tunnels/air holes etc, that are unstable and dangerous. There is also an old railway running the line of the proposed parcel, this shows the distance that the railway traveled across these fields, clearly transporting mined minerals to the canal for transportation to and from a colliery. I have included a map so you can see the collieries surrounding us, including the brickwork factory that also mined for clay on these fields. Most mining done in Hawksbury was shallow mining Whitley colliery is documented as mining in this fashion all round this area,

although deeper mining techniques were also used together..

***Wyken Main Colliery: Also known as "Main Colliery" - note that the 1887 map marks a "Main Pit Farm" just to the North. Mining in the area developed from the late 16th century, using shallow mines. Main Colliery was developed somewhere between 1789 and 1811. The medium depth mine was opened in 1861. See the British History Online reference below for some more detail. In 1886 the mine employed a total of 401 workers. Closed in 1910.

Officer Recommendation

Minor change. Para 5.12 Penultimate sentence: "for a further 3600 dwellings are proposed at an eco-suburb at Keresley, around Tile Hill station (Duggins Lane and Cromwell Lane), at Hawkesbury/Sutton Stop and Gibbet Hill."

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2217** Representation in regard to : **6.37**

Verbatim Submission

...cont

During the 17th and 18th centuries shallow mines were dug over the whole area of Sydnall and Tackley, as far south as Bell Orchard near Bell Green. (fn. 47) Beighton (1725) showed a line of coal workings from Griff in the north to Sowe in the south, running through Sydnall, Tackley, and HaWkesbury in Sowe. (fn. 48) A late-18th-century map marked several pits in the area, four in Exhal/ and two near Bayton Road in Foleshill. (fn. 49) Some of these mines were worked under lease from the corporation as the holder of Cheylesmore manor, and were operated with mines in Bedworth and Hawkesbury; separate operations in Foleshill were not distinguished in the accounts. (fn. 50) It was from his mines in Hawkesbury (Sowe) that the enterprising John Brown proposed to build canals to Longford or Hall Green in 1699. (fn. 51) To the complaint by Brown's opponents that the mines had brought many poor into the parishes, a former Foleshill overseer said that since the mines had come into use the Foleshill rates had fallen from 11d. to 7d. in the E. (fn. 52) The mines in Skinnards Close near Bell Green were held on lease from the trustees of Holy Trinity Church Estate from 1621 to at least 1746. (fn. 53)****

The Parrott (or Parratt) family were working mines in the district from at least 1721, and from 1774 to 1794 Messrs. Parrott, Ferneyhough, and Whieldon, described as of the Hawkesbury Colliery, Bedworth, had eight pits, and two others were being sunk. The firm was among the advocates of, and may have invested in, the Oxford and Coventry canals, which were cut through the mining area of Little Heath, Longford, and Hawkesbury between 1768 and 1777. It is not clear precisely where the various pits were. You should also be aware that there is suggestion that a covenant is still in effect on this land, prohibiting development. I have a resident who's deeds show this and we are in the process of acquiring them from her solicitor. When the underground tunnels collapse, this will cause subsidence of land surfaces. Under the Coal Industry Act 1994 ownership of coal (excluding coal in tips), coal mines (both current and disused) and coal mine shafts & adits (previously vested in British Coal) transferred to the Coal Authority ("the Authority"). Any activities which intersect, disturb or enter any of the Authority's coal interests require the prior written permission of the Authority. Such activities include initial site investigation boreholes and any subsequent treatment of coal mine workings and coal mine entries for ground stability purposes.

DANGERS

- Collapse of shallow mine workings
- Coal mining subsidence
- The collapse of, or risks of entry to, mine entries including shafts and adits
- Gas emissions from mines including methane and carbon dioxide
- Spontaneous combustion of coal, which may lead to underground heatings and production of carbon monoxide
- Transmission of gases to adjacent properties through underground pathways including ground fractures.
- Water emissions from workings
- Coal Seams with High Risk Spontaneous Combustion Based on Cross Over Temperature Values*

Officer Recommendation

No change.

Lentons Lane

Representor number REP-1147

Representor : Mrs Sonya Bailey

Representation number: 2218 Representation in regard to : 7.24

Verbatim Submission

...cont

I would further like to object to the release of land from the Green Belt at Lentons Lane, Coventry and the subsequent identification of the land as safeguarded for residential development based on the points below. The Core Strategy references related to these particular points are Paragraph 2.8 Paragraph 5.12 Paragraph 6.37 Paragraph 7.24 Policy 5G6 Policy 5G7 Policy 5G8 Policy EQ2'

I base my objections upon the failure of the Core Strategy when tested against the soundness tests within PPS12 (the Government's advice on Spatial Planning). PPS12 states at paragraph 4.36 that to be justifiable, they must be 'founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives. I do not consider this to be the case for the following three reasons.

The Core Strategy is not based upon the evidence base prepared;

The consideration of alternatives to Green Belt release is not evident;

The allocation for residential development has not been justified.

Core Strategies must be sound when assessed by Examination, which I understand will be occurring towards the end of this year.

My objection is based upon:

1. The failure to adhere to the evidence base: Test of soundness failed 'not justified'

The Core Strategy is underpinned by numerous studies, including Coventry City Green Belt Review 2007 and a Coventry Joint Green Belt Study 2009. The former Study identifies the area of the Green Belt at Lentons Lane on Map 10.

2. SHLAA: Test of soundness failed - 'not justified'

The Strategic Housing Land Availability Assessment (SHLAA) (2008) does not identify the land at Lentons Lane as a site considered for residential development and, again, this site should have been one of those sites considered by the Council if they wished to allocate it. The Council when identifying suitable, deliverable and achievable housing land in accordance with the Government's advice in PPS3 Housing should undertake a SHLAA. The deliverability, suitability and achievability of the site at Lentons Lane must be in question therefore, having not been through the SHLAA process.

3. Timing: Test of soundness failed - 'not justified' and contrary to Policy in PPS12 reo front loading

The allocation of the site has appeared at a very late stage within the Core Strategy process. The Core Strategy has been through an Issue and Options Stage, Preferred Options Stage and also an Emerging Core Strategy Stage - as late as November 2008 and none of those stages identified land for release from the Green Belt at Lentons Lane, nor the allocation of residential development at the site. This is inconsistent within Government advice, which seeks the frontloading of Core Strategies, and makes the process of allocation and Green Belt release unsound. PPS12 also refers to the participation of the local community within the evidence base and Core Strategy development. The major effects of this Core Strategy have not in my view been properly accounted for, as the above text requires. The participation of the local community in arriving at this decision to allocate this site and release the land from the Green Belt has not been sought until this Stage, which simply is unacceptable.

4. The Emerging Core Strategy (Nov 2008): Test of soundness failed 'not justified'

Prior to the Core Strategy Submission in March 2009, the Emerging Core Strategy was published for consultation in November through to 19th December 2008. The Core Strategy at that time did not identify the land at Lentons Lane for release from the Green Belt or for residential development. In respect of Green Belt, the Core Strategy (in November 2008) stated:

3.36 A Green Belt review has been commissioned and this recommends that some areas be added to the Green Belt.

Officer Recommendation

Minor change. Para 7.24 Amend first sentence to read: "Areas identified as potential urban extensions will be considered as reserved, unless and until it can be shown that"

Amend second sentence to read: "Following further analysis of the parcels recommended by the Joint Green Belt Study, five areas have been identified at: Cromwell Lane; Duggin's Lane; Gibbet Hill; Hawkesbury/Sutton Stop; and Keresley.

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2219** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

...cont

These are shown on the key diagram at:

- Eastern Green Corridor
- Part of the land north of former Jaguar factory, Browns Lane
- Potters Green Corridor

3.37 In addition, the emerging strategy recommends the adjustment of the Green Belt boundary to accommodate essential rebuilding and/or long-term expansion at some schools whose grounds are included within the Green Belt, whilst maintaining the integrity and continuity of green wedges through the city. Similarly, an adjustment to the Green Belt boundary may be required to accommodate the proposed new Waste to Energy Plant. The recommended adjustments are at:

- Cardinal Newman School;
- Coundon Court School;
- Ernesford Grange Community School;
- Finham Primary School;
- Finham Park School;
- Holyfast Primary School;
- Pearl Hyde Primary School;
- St Andrews Primary School;
- St Peter and St Paul Primary School;
- Tile Hill Wood School;
- Westwood School;
- Woodlands School; and
- Land around Waste to Energy Plant

3.38 Adjustments to the Green Belt boundary that retain the integrity and continuity of green wedges are also recommended at the following locations:

- The Wood End, Manor Farm and Henley Green area, to accommodate the New Deal for Communities regeneration programme
- Along the rear of houses at Cromwell Lane to provide a consistent boundary at the rear of the built-up area

3.3 As with all developments, if urban extensions are required, then they will be underpinned by green infrastructure to help development integrate into the landscape and to facilitate significant improvements in connectivity and public access, biodiversity, landscape conservation, outdoor sport and recreation. This will include the identification of Green Infrastructure Enhancement Zones in proximity to the urban extensions, as part of a wider programme to improve the quality and accessibility of the retained Green Belt land. Nowhere within the above extract concerning the Green Belt, does the Core Strategy refer to removing land at Lentons Lane from this policy safeguard. It is therefore unclear how in the space of a few months since this document was issued for consultation, the Council has formed a new evidence base that supports such a radical change in approach as removing land from the Green Belt and its development for 160 new homes. I understand that the recent City Green Belt Study 2009 has been issued. The following extract is taken from Appendix 11 and of particular note are the conclusions and recommendations. There is clear support in the City Green Belt Study 2009 for the retention of land at Lentons Lane in the Green Belt. The references to its rural character and landscape are key considerations that appear to have been ignored by the Submission Core Strategy.

5. Submission Core Strategy (March 2009) Test of soundness failed - 'not justified', 'effective' or 'consistent with national policy'

Areas of objection

The change in strategic approach for the Council is first covered in para 2.8 of the Strategy. I object to this reference that appears to suggest the Regional Spatial Strategy (RSS) is the justification for this changed approach and expansion of the urban area. The scale of development referred to has been known since the RSS was issued in January 2008 for public consultation and was the basis for the previous Preferred Option of the Core Strategy. That document (the version issued in the Summer 2008 or the version in November 2008) did not expand growth towards Lentons Lane and therefore suggesting that the RSS is now the reason behind this policy move is clearly wrong, because the draft RSS has been in place for the last 14 months.

Officer Recommendation

No change.

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2220** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

...cont

I also object to para 5,12 of the Core Strategy that refers to Green Belt release at Lentons Lane. This paragraph suggests that the recommendations of the Joint

Green Belt Study 2009 support the Lentons Lane release; however, the above extract from Appendix 11 clearly shows that the land is recognised for continued protection. Again, I consider that this part of the Core Strategy is contrary to the evidence base.

The Policy appears on first reading to prioritise other sites before the safeguarded land; however, on further reading it is clear that in the absence of a five-year supply of land, that safeguarded land will be released. I am very concerned that developers will monitor the five-year land supply position and as soon as this position arises, will submit a planning application. This is particularly relevant when one considers that the RSS requires 33,500 dwellings in Coventry to be built by 2026. Deducting the completions to date, and then dividing the residual figure between the plan period remaining (18 years) and then multiplying by 5 to arrive at a five-year requirement gives a figure of 8,718 dwellings.

The current outstanding commitments (planning permissions and dwellings under construction) amount to 3,250 (using the figures within the table on page 41 of the Core Strategy). Thus the City does not have a five-year supply at present (of what the Government would accept as being deliverable sites). The remaining supply is made up of SHLAA sites, allocations and major regeneration schemes; however, a prudent house builder would easily be able to cast doubt on their deliverability in a five year time horizon and call upon land like that at Lentons Lane to satisfy this shortfall.

This clearly is not acceptable.

The Sustainability of the land at Lentons Lane

I consider that the land at Lentons Lane is a very unsustainable allocation for housing. The Core Strategy applies Policy SG7 to new housing development that may come forward and I consider that using the criteria in this policy, it can easily be demonstrated that Lentons Lane does not satisfy the Policy approach for new housing locations. Should the Council suggest this policy does not apply to allocated sites or safeguarded land, and only to windfall sites for example, we would query why the sustainable approach applied towards housing locations (Policy SG7) is selective. Surely it should apply to all housing sites?

Taking the above policy into account, the development of 160 new homes at Lentons Lane would not deliver urban regeneration - the area is clearly on the urban fringe as acknowledged in the City's own Green Belt Studies 2007 and 2009 and is surrounded to the south and east by agricultural land, and beyond the narrow strip of housing to the northern side of the Lane, further expansive Green Belt is found.

The contribution of 160 homes is also conversely not significant enough to deliver anything other than new homes to this area. Thus, no new schools, shops, doctors, community facilities etc or improved infrastructure will follow. The most one would reasonably expect is a 25% affordable housing contribution and potentially on-site play space. No existing services or facilities of any merit are found at Lentons Lane or in the immediate community to serve these new homes. The above policy refers to housing development being located within 1km of Primary Schools. The nearest school is Aldermans Green and this is 1 mile/ 1.6km from the site's western (closest) edge and thus, if developed, the majority of homes would be even further away. The nearest secondary school is Foxford, and again this is over a mile, at 2.3km from the western edge of the site. At these distances no one would reasonably expect children to walk and thus we can reasonably assume that car-based travel will be the main mode for pupils, via their parents. Bell Green District Centre is over 2 miles from the site's western edge.

Officer Recommendation

No change

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2221** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

...cont

This is the location of the nearest doctors and dentist, and thus does not conform with Policy SG 8. Further, the local bus service along Lentons Lane was downgraded recently as part of the bus operator's route changes. This is linked to an arrangement with the Tesco Arena development and therefore new route changes are unlikely. The current route of the bus does not go to Bell Green and therefore local people in Lentons Lane (the 'catchment area surgery' for which, is in Bell Green) cannot catch a bus to the surgery and again are reliant upon the car. New homes would simply add to that local traffic.

The bus route does run along Lentons Lane and is thus within 400m of the site's edge; however, as noted above it does not run to the District Centre, the secondary school, or employment areas and the journey takes some 30-40 minutes to the City Centre and only operates once an hour.

Finally, the nearest employment area is at the Aldermans Green Industrial Estate, again over 2km to the site and not connected by public transport. I also object to paragraph 6.37 and policy 5GB concerning the release of land. The above text and policy once again allows for the release of safeguarded land in the absence of five-year land supply. I have already commented on the fragility of the city's supply and the vulnerability of safeguarded land in this respect.

The safeguarded land has not been assessed for deliverability (i.e. it is not in the SHLAA) and I consider it is inappropriate to place reliance on sites like this coming forwards.

I also object to para 7.24 of the Strategy, This suggests that locations for release (i.e. Lentons Lane) are well integrated with existing development. The narrow ribbon of residential properties that runs along the northern boundary of Lentons Lane, opposite the site (most properties have been standing between 50 and 100 years) comprises just 51 properties. I do not consider that this constitutes an urban edge or anything of the order into which one would consider, the development of 160 new homes could be integrated. Quite simply, the new housing would dominate the local character of this rural Lane.

As already highlighted, the public transport is poor - just an hourly service and one that does not make local connections to services, facilities or employment. The above reference to Lentons Lane therefore in the paragraph is not representative. I object to the policy EQ2 that removes land at Lentons Lane from the Green Belt and allocates it as safeguarded land. I cannot see how the development of land for 160 homes at Lentons Lane can contribute to local development - as the policy EQ2 suggests. There are simply no local facilities for it to contribute to, or support.

6. The assessment of the land within the Green Belt Study The Green Belt Joint Core Strategy (2009) considers the role and objectives of the Green Belt at para 2.2.5, 2.3.4 and 2.3.5. Of particular note is para 2.3.5 that states:

2.3.5 In relation to the uses of the land within Green Belts, PPG2 states that:

It is of interest therefore that the City Green Belt Study assesses the land against the purposes of the Green Belt and where less than four of the five purposes are met, the land is recommended for further study. Yet the above extract clearly states that the extent to which land fulfills the objectives is not a material factor in its inclusion. The Regional Spatial Strategy for the West Midlands does allow for adjustment of the Green Belt boundaries for the purposes of supporting regeneration in the major urban areas like Coventry but I fail to see how this criterion is met because developing 160 houses on the urban fringe of Coventry will clearly not contribute to the City's urban area regeneration schemes which are identified in the Core Strategy itself. The Council relies upon the Green Belt Joint Study to support its removal of the land at Lentons Lane from the Green Belt.

Officer Recommendation

No change

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2222** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

It identifies the parcel of land as CD2.

The land is assessed and scored against criteria that give an overall score to the site of 7.5.

The criteria however, are subjective. The first subset of criteria for scoring is noted in para 4.4.3 of the Study. These cover physical matters and national designations. It is unclear how these criteria relate to the 5 purposes of maintaining the land in the Green Belt. None of them are mentioned as being important to the purposes of Green Belt, as noted in PPG2 Green Belts. Thus a potential 14 points are awarded to sites that have these features, albeit they are not important features to a Green Belt. Lentons Lane does not have any of these features and thus is unfairly penalised as a result. The assessment in the Study turns to consider secondary criteria at para 4.4.4. again it is unclear how these fulfill the purposes of Green Belt, and again points are awarded for example where sites are constrained by main roads or rail tracks. However these features relate to a site's development potential as opposed to its Green Belt function. Such factors have no place in a Green Belt Study.

Para 4.4.14 of the Study refers to photomontages within Appendix 10 of the Study. These photomontages assess landscape value and visual attributes. I can find no images that relate to Green Belt at Lentons Lane. I must therefore question its assessment in visual and landscape terms, which I do not consider has been appropriately assessed.

Land at Lentons Lane was assessed as being of medium value in the Study, as part of the conclusions This is:

- Medium Value

The parcel is considered to have medium value for Green Belt function due to degraded landscape characteristics (e.g. loss of field pattern, woodland degradation and urban fringe activities). These parcels could benefit from specific enhancement works including the creation of new multi-use corridors for conservation and public recreation.

Connectivity to the Urban Area

Para 4.4.17 of the Study addresses the connectivity of the individual parcels to the urban area. It acknowledges that 'Whilst the purpose of this study is not to identify specific sites to be removed from the Green Belt for future development, rather to identify more specific parcels of land for the four Local Authorities to consider in greater detail through their Core Strategies, it is considered that in order for a site to come forward for development in the future, it must be in some way connected to the urban area. It would not be considered appropriate for a parcel to be taken forward for detailed site identification if it is not connected to an urban area.'

The land at Lentons Lane is clearly not connected to the urban area - being surrounded on two sides by agricultural Green Belt land, and a narrow stretch of homes along its northern boundary. The site at Lentons Lane scored nil points on connectivity and therefore its release in the Core Strategy is clearly contrary to this advice. A number of other Green Belt sites were assessed in the Study.

The following parcels were assessed and scored lower than Lentons Lane (site C2D)

These sites were:

C9b-5

C15b - 5.5

C19d - 6

WL6b-4

W110-6

None of the above sites score points for connectivity and therefore were equal to Lentons Lane in this respect; however, even with an overall score of less than 7.5 (the Lentons Lane site), these other sites were not allocated for development. Lentons Lane was.

The following sites also scored 7.5 within the assessment and yet were not allocated for development and they are:

C2g, C4b, C10a and C12c.

Therefore, the scoring process appears to have been inconsistent in terms of the fact that sites which were identified for release from the Green belt (i.e Lentons lane) were recommended on the basis of scoring in this assessment; however, sites scoring equal or less did not incur the same fate.

Officer Recommendation

No change

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2223** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

Green Belt release

I do not consider that the release of the land at Lentons Lane is justified and no exceptional circumstances have been outlined in the Core Strategy or its evidence base to warrant its release from this designation. The approach is therefore contrary to PPG2 Green Belts (national advice) and the Core Strategy is unsound as a result.

It is unclear what alternatives rather than Green Belt releases have been considered by the Council. Certainly the review of Green Belt and recommended releases are inconsistent in terms of their scoring within the Study undertaken, the criteria used to assess them and the conclusions reached. Indeed, the most recent Green Belt Study for the City in Appendix 11 refers to the retention of the land parcel assessed as C2 (incorporating Lentons Lane) and therefore its release is contrary to that Study's findings. Urban Renaissance and Growth in Coventry

The City is a major urban area and Growth Point and we fail to see how the release of a site for 160 homes in the Green Belt on the urban fringe, surrounded by farmland, is commensurate with the aims of delivering urban renaissance and growth in line with the City's Growth Point Bid.

Lack of Evidence

The baseline data that underpins the sites identification and release is vague if not non-existent. The site was not identified until the release of the Core Strategy in March 2009, and until then the previous three versions of the Core Strategy, including the November 2008 issue, did not identify the site for release from the Green Belt or for housing. It is wholly inconsistent for the Council to claim that they have 'frontloaded' this process, involved the community or indeed has any evidence base to support the site's coming forward. I have not seen any data relating to the site being deliverable and consider that there are several constraints.

Briefly these comprise:

Infrastructure

Severn Trent have confirmed the location of a water main that serves the north east of Coventry running diagonally through the site and that was constructed within the last few years. Housing cannot be built on this water main, as Severn Trent have confirmed, and thus this will particularly affect any master planning of the site.

Ecology

Being a Greenfield site and farmed for centuries the site has an abundance of wildlife. The hedgerows and trees are of particular note, and if subject to assessment under the Hedgerow Regulations would qualify as 'important' and thus should not be removed as part of development. Again, this would severely constrain the site.

Transport Assessment

The site's development would of course require a Transport Assessment. With limited public transport to note and no cycle ways or other sustainable transport modes available, the Assessment would conclude reliance upon the car. With the site being situated on Coventry's northern edge between junctions 2 and 3 of the motorway, a reliance on car-based travel is inevitable. This is contrary to both Government Guidance, regional Planning Guidance and the aims of the Core Strategy itself. Landscape and Visual Impact No site-based appraisal has been undertaken to my knowledge. The claims that an assessment of some kind has been done in the Green Belt Study for the City is not evidenced by photomontages suggesting that this is the case. A clear requirement of any development for this rural location would be an appraisal and this would clearly highlight the flat, open character of the land, its prominence when viewed from medium to long distances and the negative impact on the openness and rurality of the site if it were developed. The failure to contribute to the local community The proposals will clearly only detract from the local community at present.

Officer Recommendation

No change

Lentons Lane

Representor number **REP-1147**

Representor : **Mrs Sonya Bailey**

Representation number: **2312** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

...cont

The development of 160 homes will not deliver any other social and community benefits for the area - i.e. no school, no shops, no facilities etc and therefore further strain will be placed on the facilities that themselves are located over 2km away at Bell Green - which is the nearest doctors, dentists and shopping area. This centre is no longer connected to Lentons Lane by public transport. Thus 160 new homes will simply add at least 160 - 320 people, and possibly more - with families being present, to this area where there are no shops, employment areas, regular bus services of note or community facilities. I fail to see how this can be considered as building a sustainable community. I therefore strongly urge the Council to remove the allocation of housing from land at Lentons Lane and reinstate the Green Belt to its former status. The reference to the site being safeguarded land for future development should be removed from the Strategy too.

All relating information contained herein can be viewed in more detail at <http://www.lentonslane.co.uk.asite> I set up to collate all information regards this parcel and help keep residents informed. I have also included a copy of all correspondence between the Council and myself.

Please accept these objections and place my contact details on the database for further receipt of documentation regarding the Core Strategy and the allocation of land at Lentons Lane.

Officer Recommendation

No change

Lentons Lane

Representor number **REP-1152**

Representor : **Bernice Hill**

Representation number: **2275** Representation in regard to : **7.24**

Verbatim Submission

We would like to object to the release of land from the Green Belt at Lentons Lane, Coventry, and the subsequent identification of the land as safeguarded for residential development. The Core Strategy references related to these particular points are:

Paragraphs 2.8,5.12,6.37 and 7.24, and policies SG6, SG7, SG8 and EQ2.

We base our objections upon the failure of the Core Strategy when tested against the soundness tests within PPS12 (the Government's advice on Spatial Planning).

PPS12 states in paragraph 4.36 that in order to be justifiable, Core Strategies must be "founded on a robust and credible evidence base; and the most appropriate strategy when considered against reasonable alternatives".

I do not consider this to be the case for the following reasons: The Core Strategy is not based upon the evidence base prepared, the consideration of alternatives to Green Belt release is not evident and the allocation for residential development has not been justified.

No exceptional circumstances have been outlined in the Core Strategy or its evidence base to warrant the release of the land from the Green Belt designation, contrary to PPG2 Green Belts (national advice from the Government). It is unclear what alternatives to Green Belt release the Council have considered. In the most recent Green Belt Study for the City of Coventry (the Green Belt Study 2009, specifically Appendix 11) the parcel of land (including Lentons Lane) referred to as C2 is considered worth retaining. Therefore its release in the Core Strategy is contrary to that study's findings.

The City of Coventry's Growth Point Bid, aiming to deliver urban renaissance and growth, is not commensurate with the release of land for 160 homes within Green Belt land on the urban fringe. The construction of these houses will, more likely than not, drive more people from the centre of Coventry to the city's outskirts.

Previous versions of the Core Strategy did not identify the Lentons Lane land for release from Green Belt designation for the construction of housing. It is consistent for the Council to claim that they have 'frontloaded' this process (consistent with national policy), involved the community or have any evidence base to support the site. The baseline data supporting the identification and release of the land is vague or non-existent. The constraints on the use of the site are severe. Particularly:

- Severn Trent have confirmed that the water main that serves the NE of Coventry runs through the site, was constructed recently and cannot have any residential housing constructed upon it.
- The site is a Greenfield site that has been farmed for centuries and contains an abundance of wildlife the hedgerows and trees would undoubtedly qualify as important under the Hedgerow Regulations and could not be removed as part of the residential development, severely constraining any building program upon the land.
- There is limited public transport to the site and no cycle ways or other transport modes available. With the site situated at the northern edge of the Coventry between junctions 2 and 3 of the M6 motorway any development here would rely inevitably on car based travel; contrary to the Government's, Region's and City's aims for reducing car based travel.
- There has been no site-based appraisal undertaken (that we know of). The claim that an assessment of some has been done, in the Green Belt Study for the City of Coventry, is not evidenced by the photomontages suggesting this is the case. A clear requirement of any development in this rural location would be an appraisal and that would clearly highlight the flat, open character of the land, its prominence when viewed from medium to long distances and the negative impact on the openness and pastoral nature of the site. In short, it is unsuitable for development.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1153**

Representor : **Roy Jennings**

Representation number: **2277** Representation in regard to : **5.12**

Verbatim Submission

WWe would like to object to the release of land from the Green Belt at Lentons Lane, Coventry, and the subsequent identification of the land as safeguarded for residential development. The Core Strategy references related to these particular points are:

Paragraphs 2.8,5.12,6.37 and 7.24, and policies SG6, SG7, SG8 and EQ2.

We base our objections upon the failure of the Core Strategy when tested against the soundness tests within PPS12 (the Government's advice on Spatial Planning).

PPS12 states in paragraph 4.36 that in order to be justifiable, Core Strategies must be "founded on a robust and credible evidence base; and the most appropriate strategy when considered against reasonable alternatives".

I do not consider this to be the case for the following reasons: The Core Strategy is not based upon the evidence base prepared, the consideration of alternatives to Green Belt release is not evident and the allocation for residential development has not been justified.

No exceptional circumstances have been outlined in the Core Strategy or its evidence base to warrant the release of the land from the Green Belt designation, contrary to PPG2 Green Belts (national advice from the Government). It is unclear what alternatives to Green Belt release the Council have considered. In the most recent Green Belt Study for the City of Coventry (the Green Belt Study 2009, specifically Appendix 11) the parcel of land (including Lentons Lane) referred to as C2 is considered worth retaining. Therefore its release in the Core Strategy is contrary to that study's findings.

The City of Coventry's Growth Point Bid, aiming to deliver urban renaissance and growth, is not commensurate with the release of land for 160 homes within Green Belt land on the urban fringe. The construction of these houses will, more likely than not, drive more people from the centre of Coventry to the city's outskirts.

Previous versions of the Core Strategy did not identify the Lentons Lane land for release from Green Belt designation for the construction of housing. It is consistent for the Council to claim that they have 'frontloaded' this process (consistent with national policy), involved the community or have any evidence base to support the site. The baseline data supporting the identification and release of the land is vague or non-existent. The constraints on the use of the site are severe. Particularly:

- Severn Trent have confirmed that the water main that serves the NE of Coventry runs through the site, was constructed recently and cannot have any residential housing constructed upon it.
- The site is a Greenfield site that has been farmed for centuries and contains an abundance of wildlife the hedgerows and trees would undoubtedly qualify as important under the Hedgerow Regulations and could not be removed as part of the residential development, severely constraining any building program upon the land.
- There is limited public transport to the site and no cycle ways or other transport modes available. With the site situated at the northern edge of the Coventry between junctions 2 and 3 of the M6 motorway any development here would rely inevitably on car based travel; contrary to the Government's, Region's and City's aims for reducing car based travel.
- There has been no site-based appraisal undertaken (that we know of). The claim that an assessment of some has been done, in the Green Belt Study for the City of Coventry, is not evidenced by the photomontages suggesting this is the case. A clear requirement of any development in this rural location would be an appraisal and that would clearly highlight the flat, open character of the land, its prominence when viewed from medium to long distances and the negative impact on the openness and pastoral nature of the site. In short, it is unsuitable for development.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1154**

Representor : **D.M Wyer**

Representation number: **2278** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

I understand that the above proposal was not on the previous plans and therefore regard the introduction as showing a complete lack of regard to the local community as there was no consultation. The Council have not followed the National Policy and there is a feeling that it has been "quietly slipped in" in the hope that people will be too late to object. The land is part of a working farm and the land has not been left fallow but been used to allow sheep and cattle to graze in the open. There have been numerous horror stories in the press about animals raised in poor conditions and I find it amazing that Coventry City Council plan to build on land used for farming.

The Government repeatedly encourage the public to become more active and yet Coventry City Council proposes to declassify land that is used by a number of groups and individual people for walking. At the moment the area provides the opportunity for people to access the countryside from the regeneration area of Deedmore Henley Green without having to use transport. There is an

abundance of wildlife in the area that will lose its natural habitat and the enjoyment of walking in the area will diminish. I can assure you that it is far more pleasant to walk in open spaces than around a housing estate.

With the closure of the City Farm I would have hoped that the Council would have taken this opportunity to support the continuation of working farms within the city boundary. The education of our young people is of extreme importance and Coventry has a golden opportunity to enhance their understanding and knowledge of rural life. Instead it plans to increase the urban area. Is this the aim

of urban renaissance and growth? Is this in line with the City's Growth Point Bid? I would be pleased to hear your views.

The most recent Green Belt Study for the City refers to the retention of the land (Appendix 11) which includes the land in Lentons Lane and therefore I believe that the Planning Team have acted contrary to this.

I feel that the Council have looked at a map of Coventry and chosen these green fields without visiting the area. If they had I am sure they would have realised that the infrastructure is not suitable for possible growth. Lentons Lane is a narrow road and cars often have to stop to allow oncoming traffic to continue. If the proposed site was used for housing the lane would need to be widened which would mean the hedgerows, which the Government are eager to develop and retain, would

have to be demolished.

Although, on paper, we have two buses an hour along the lane; the buses travel in opposite directions and actually pass each other on the lane. We, therefore, have the opportunity to go one way or the other each hour. If Coventry Council develop this site the residents would have to rely on their own transport which is contrary to the Governments, the Regions and the City's aims of reducing

car based travel and will add to the pollution we are all trying to reduce.

There are two major roads into the city. One is via Shilton Lane and Deedmore Road where there are several traffic calming systems which will lead to more traffic chaos and pollution. The second is via Aldermans Green Road and will lead to longer queues at the various traffic lights, especially around Bell Green: areas which are highly densely populated areas of the city. I understand that a development requires schools, shops, doctors and dentists within a certain radius.

I would be interested to know if the planners are able to confirm that this is so. I also believe that any new development

should contribute to the local area but I believe it will only put a strain on this community. I therefore strongly urge the Council to remove the allocation of land at Lentons Lane and reinstate the Green Belt to its former status. The reference to the site being safeguarded land for future development should be removed from the Strategy too.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1155**

Representor : **Mrs L R Reece**

Representation number: **2279** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

I would like to object to the release of land from the green belt at Lentons Lane, Coventry. I do not consider that the release of the land at Lentons Lane to be justified and no exceptional circumstances were outlined in the core strategy of evidence to warrant the lands release from this designation contrary to national advice from Government.

I have lived in Lentons Lane for many years and have seen Severn Trent put in water main pipes through this green belt land and then return it to its original state when the work was completed.

This work did not disturb the wildlife on the site or disturb the hedges and trees which are many years old. These fields are a joy to see and many walkers remark on how they enjoy walking along the lane to see the lambs and wildlife that have been in this area for many years. As Lentons Lane is on the very north of Coventry, transport to and from this area for work would be very difficult and would most likely have to be by car as buses are few and far between and do not readily take you where you need to go so the need for extra car journeys would be needed if this area was developed which would cause many problems ie: the access roads to the area being very poor and roads very narrow - Deedmore Road and Aldermans Green Road. There are no adequate local shops, schools or doctors surgeries so there would be further need to use these inadequate roads.

I would urge the Coventry Council to remove the allocation of housing from the land at Lentons Lane and reinstate the green belt to its former status. The reference to this site being safeguarded land for development should be removed from the strategy too. Please accept my objections and include my name on your list for further information to be sent regarding allocation of land in Lentons Lane.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representor number **REP-1156**

Representor : **Mr J W Reece**

Representation number: **2280** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

I am writing regarding the proposed development of houses on which the green belt land in Lentons Lane. As there is very little green belt land left for us in Coventry and also land which is within a reasonable walking distance from houses on this northern side of the city it was with much dismay that I read in the newspaper that this green belt land and the wildlife therein were to be designated for housing. There is also very little transport to and from this area and this makes it difficult to get to shops as there are no local shops or dentists and doctors. In this day and age we are encouraged by the government not to use our cars so much as making an impact on global warming. The use of this land for housing would add many more car users and take away the pleasure of our green fields and wildlife. I feel there must be some available peaceful green belt land for people to take pleasure in and I am very upset that this land could be taken from the people in Coventry.

I would like to be kept informed of any developments on this issue.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1157**

Representor : **Mr M J Craner**

Representation number: **2281** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

Approximately 2 or 3 weeks ago, I was informed that there is a proposal to release the land of Green Belt at Lentons Lane. I object to this proposal strongly. This area of Green Belt is right on the boundary of Coventry and Rugby, and is one of the few areas in the City where there is access to the Oxford Canal and Countryside. People from Aldermans Green, Manor Farm, Deedmore Road, Potters Green and the members of the Cruiser Club situated at Wyken Canal Basin all at the moment have access to this area, and it would be a disaster if this area was to be taken away from us all. This Green Belt area has an abundance of wildlife. Foxes, Squirrels, Rabbits, Pheasants, Mallards, Herons, Blue Tits, Coal Tits, Greenfinch, Chaffinch, Robins, Blackbirds, Wrens, Sparrow, Hawks, Woodpeckers and also Frogs, Roads and Great Crested Newts. I assume, therefore, if this land is released there is a possibility all this will be lost; as it is highly possible of being a developments for houses, shops etc.As a matter of interest, I counted the houses for sale and to let in the Coventry Telegraph it was a figure of approximately 3,000 plus. I have noticed numerous houses in Deedmore Road and Wood End boarded up. I object to the way this issue has been handled, as we have all been informed at a very late stage, and also for the reasons I have stated in this letter. I therefore urge the council to reconsider the release of this land. Please accept these objections and place my contact details on the Database for further receipt of documentation regarding the Core Strategy and the allocation of land at Lentons Lane.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representor number **REP-1158**

Representor : **Mr C E Lomas**

Representation number: **2282** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

I was alarmed to hear only two weeks ago that Coventry City Council proposes to release Green Belt land on Lentons Lane farm for a substantial housing development, and that the application has apparently reached an advanced stage without any consultation of local residents and others who would be affected having taken place. If this is the case I would very much like to know the rationale behind the proposal. Green Belt land in the Hawkesbury area is a recreational resource for visitors as well as residents, and there is certainly not enough local demand for new housing to justify encroachment upon it. If the aim is simply to provide additional housing for the city in general, this is surely not an ideal site. There are very few local amenities in terms of schools, shops or employment opportunities, and the road network in the immediate vicinity is clearly inadequate for the inevitable increase in traffic. It would surely be more in keeping with the City's policy of urban renewal and the Government's stance on the preservation of Green Belts to locate this development on a Brown Field site nearer to the City Centre. I appreciate that you will probably already have received a good deal of correspondence in regard to this matter, and may not be able to give an individual response to my letter. I would however ask that you take note of my objections and keep me informed of any further developments.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1159**

Representor : **Mr & Mrs Russell**

Representation number: **2283** Representation in regard to : **2.8**

Verbatim Submission

The change in strategic approach for the Council is first covered in para 2.8 of the Strategy. I object to this reference that appears to suggest the Regional Spatial Strategy (RSS) is the justification for this changed approach and expansion of the urban area.

The scale of development referred to has been known since the RSS was issued in January 2008 for public consultation and was the basis for the previous Preferred Option of the Core Strategy. That document (the version issued in the Summer 2008 or the version in November 2008) did not expand growth towards Lentons Lane and therefore suggesting that the RSS is now the reason behind this policy move is clearly wrong, because the draft RSS has been in place for the last 14 months.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representation number: **2284** Representation in regard to : **5.12**

Verbatim Submission

I also object to para 5,12 of the Core Strategy that refers to Green Belt release at Lentons Lane. This paragraph suggests that the recommendations of the Joint Green Belt Study 2009 support the Lentons Lane release; however, the above extract from Appendix 11 clearly shows that the land is recognised for continued protection. Again, I consider that this part of the Core Strategy is contrary to the evidence base.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representation number: **2285** Representation in regard to : **6.37**

Verbatim Submission

I also object to paragraph 6.37 and policy SG8 concerning the release of land. The above text and policy once again allows for the release of safeguarded land in the absence of five-year land supply. I have already commented on the fragility of the city's supply and the vulnerability of safeguarded land in this respect.

The safeguarded land has not been assessed for deliverability (i.e. it is not in the SHLAA) and I consider it is inappropriate to place reliance on sites like this coming forwards.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representation number: **2286** Representation in regard to : **7.24**

Verbatim Submission

This suggests that locations for release (i.e. Lentons Lane) are well integrated with existing development. The narrow ribbon of residential properties that runs along the northern boundary of Lentons Lane, opposite the site (most properties have been standing between 50 and 100 years) comprises just 51 properties. I do not consider that this constitutes an urban edge or anything of the order into which one would consider, the development of 160 new homes could be integrated. Quite simply, the new housing would dominate the local character of this rural Lane. As already highlighted, the public transport is poor - just an hourly service and one that does not make local connections to services, facilities or employment. The above reference to Lentons Lane therefore in the paragraph is not representative.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1159**

Representor : **Mr & Mrs Russell**

Representation number: **2287** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

The Policy appears on first reading to prioritise other sites before the safeguarded land; however, on further reading it is clear that in the absence of a five-year supply of land, that safeguarded land will be released. I am very concerned that developers will monitor the five-year land supply position and as soon as this position arises, will submit a planning application. This is particularly relevant when one considers that the RSS requires 33,500 dwellings in Coventry to be built by 2026. Deducting the completions to date, and then dividing the residual figure between the plan period remaining (18 years) and then multiplying by 5 to arrive at a five-year requirement gives a figure of 8,718 dwellings.

The current outstanding commitments (planning permissions and dwellings under construction) amount to 3,250 (using the figures within the table on page 41 of the Core Strategy). Thus the City does not have a five-year supply at present (of what the Government would accept as being deliverable sites). The remaining supply is made up of SHLAA sites, allocations and major regeneration schemes; however, a prudent house builder would easily be able to cast doubt on their deliverability in a five year time horizon and call upon land like that at Lentons Lane to satisfy this shortfall.

This clearly is not acceptable.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Lentons Lane

Representor number **REP-1159**

Representor : **Mr & Mrs Russell**

Representation number: **2288** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

I consider that the land at Lentons Lane is a very unsustainable allocation for housing. The Core Strategy applies Policy SG7 to new housing development that may come forward and I consider that using the criteria in this policy, it can easily be demonstrated that Lentons Lane does not satisfy the Policy approach for new housing locations. Should the Council suggest this policy does not apply to allocated sites or safeguarded land, and only to windfall sites for example, we would query why the sustainable approach applied towards housing locations (Policy SG7) is selective. Surely it should apply to all housing sites?

Taking the above policy into account, the development of 160 new homes at Lentons Lane would not deliver urban regeneration - the area is clearly on the urban fringe as acknowledged in the City's own Green Belt Studies 2007 and 2009 and is surrounded to the south and east by agricultural land, and beyond the narrow strip of housing to the northern side of the Lane, further expansive Green Belt is found. The contribution of 160 homes is also conversely not significant enough to deliver anything other than new homes to this area. Thus, no new schools, shops, doctors, community facilities etc or improved infrastructure will follow. The most one would reasonably expect is a 25% affordable housing contribution and potentially on-site play space. No existing services or facilities of any merit are found at Lentons Lane or in the immediate community to serve these new homes. The above policy refers to housing development being located within 1km of Primary Schools. The nearest school is Aldermans Green and this is 1 mile/1.6km from the site's western (closest) edge and thus, if developed, the majority of homes would be even further away. The nearest secondary school is Foxford, and again this is over a mile, at 2.3km from the western edge of the

site. At these distances no one would reasonably expect children to walk and thus we can reasonably assume that car-based travel will be the main mode for pupils, via their parents. Bell Green District Centre is over 2 miles from the site's western edge. This is the location of the nearest doctors and dentist, and thus does not conform with policy SG&. Further, the local bus service along Lentons Lane was downgraded recently as part of the bus operator's route changes. This is linked to an arrangement with the Tesco Arena development and therefore new route changes are unlikely. The current route of the bus does not go to Bell Green and therefore local people in Lentons Lane (the 'catchment area surgery' for which, is in Bell Green) cannot catch a bus to the surgery and again are reliant upon the car. New homes would simply add to that local traffic. The bus route does run along Lentons Lane and is thus within 400m of the site's edge; however, as noted above it does not run to the District Centre, the secondary school, or employment areas and the journey takes some 30-40 minutes to the City Centre and only operates once an hour. Finally, the nearest employment area is at the Aldermans Green Industrial Estate, again over 2km to the site and not connected by public transport.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representation number: **2289** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

I also object to paragraph 6.37 and policy SG8 concerning the release of land. The above text and policy once again allows for the release of safeguarded land in the absence of five-year land supply. I have already commented on the fragility of the city's supply and the vulnerability of safeguarded land in this respect.

The safeguarded land has not been assessed for deliverability (i.e. it is not in the SHLAA) and I consider it is inappropriate to place reliance on sites like this coming forwards.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Representation number: **2290** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

I object to the policy EQ2 that removes land at Lentons Lane from the Green Belt and allocates it as safeguarded land. I cannot see how the development of land for 160 homes at Lentons Lane can contribute to local development - as the policy EQ2 suggests. There are simply no local facilities for it to contribute to, or support.

Officer Recommendation

Minor change. Delete Lentons Lane safeguarded lane annotation from proposals map, and table 3.

Park Hill Lane

Representor number **REP-0015**

Representor : **Mr Alan Cooper**

Agent Details Company: **RPS**

Contact: Kathy Else

Representation number: **1676** Representation in regard to : **5.13**

Verbatim Submission

Support is provided for the general aim of the paragraph which appropriately recognises the need for housing provision. However, reference to 7,000 dwellings must be treated as a minimum figure and recognition that the figure could increase as a result of the RSS process and a more rigorous examination of the land supply and methodology used in the draft Core Strategy should be given. The last sentence should reflect the outcome of the RSS housing figure and the analysis of the housing land supply position and genuine available capacity within the City's administrative boundary. 7,000 dwellings should therefore be treated as a minimum requirement.

Officer Recommendation No change

Representation number: **1677** Representation in regard to : **5.14**

Verbatim Submission

The last sentence stating that the premature release of greenfield land can aggravate market conditions does not have regard to prevailing housing market conditions and the need to ensure delivery of a suitable range of housing and a five year housing land supply.

RPS advocates that the CS should be able to demonstrate that housing is deliverable and continuous and may benefit from the inclusion of a housing trajectory.

Unless the approach to housing delivery adopts a more positive approach to the early release of greenfield sites, the Government's national priority of securing an adequate supply of housing will not be realised. The current strategy and over-reliance on PDL was produced in a pre-downturn era and bears no resemblance to the realities and necessity to provide a flexible plan which can positively respond to housing delivery.

In such circumstances housing delivery should not be constrained by an outdated sequential approach principle and be based upon delivering the most sustainable opportunities early.

Delete last sentence of paragraph 5.14

Officer Recommendation No change

Representation number: **1678** Representation in regard to : **TABLE 2: COMPONENTS OF HOUSING SUPPLY 2006 TO 2026**

Verbatim Submission

There is a lack of justification for significant elements of the housing land supply table. In particular its inclusion of land with permissions is contrary to PPS3 (paragraph 58).

Re-use of empty homes does not count as new dwellings and should therefore be removed entirely from the land supply.

Greater scrutiny of capacity from the SHLAA assumptions, regeneration schemes and housing allocations needs to be taken.

Officer Recommendation No change

Representation number: **1679** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

The phasing policy is insufficiently specific, containing no timescales or references to specific sites.

It is recommended additional text is inserted at the end of the policy.

Officer Recommendation No change

Park Hill Lane

Representor number **REP-0015**

Representor : **Mr Alan Cooper**

Agent Details Company: **RPS**

Contact: Kathy Else

Representation number: **1680** Representation in regard to : **7.26**

Verbatim Submission

The proposed alterations to the Green Belt boundary at education sites to allow for redevelopment are acknowledged. However, the proposals could be justified by very special circumstances through the application process in relation to the delivery of educational facilities for the region. Similarly the Whitley waste plant site could also be justified as an exemption from policy. The removal of Green Belt designation from these areas also removes the restriction on extensions as well as the limited scale and sensitive design of buildings, possibly allowing future development to compromise the openness of the surrounding Green Belt at these locations.

Officer Recommendation No change

Representation number: **1681** Representation in regard to : **7.23**

Verbatim Submission

Support is provided for the joined up approach taken towards the direction to produce a sub-regional Green Belt Study. RPS also acknowledges the specific Coventry Green Belt Review work.

However, the views expressed in the paragraph that the Joint Green Belt Review document is 'comprehensive' cannot be agreed with. Concerns are raised over the lack of consultation on the document's preparation and robustness of its methodology.

The document's assessment of land parcels around the City boundary does cause considerable concern. Whilst it is acknowledged there is a need to define land parcels, the methodology used for the identification of land parcels selected for the study analysis has not been explained. There are several examples of where a more refined approach would have resulted in different land parcels (from that concluded in the study) being selected for the secondary assessment and in RPS's view being identified as 'least constrained'.

In RPS's view this demonstrates that the sub-regional Green Belt Study whilst well intentioned and informative in demonstrating that lands do exist that are suitable for removal from the Green Belt, it cannot be considered as being 'comprehensive' for the purposes of identifying 'least constrained' areas of land.

In RPS's view further detailed, robust and transparent assessment should therefore be undertaken to establish which areas of Green Belt land may be least constrained and along with further assessment of sites and land parcels availability, suitability and achievability.

Officer Recommendation No change

Representation number: **1682** Representation in regard to : **7.19**

Verbatim Submission

Section 7 specifically considers Coventry's Green Belt in relation to its purpose, role and functions. The four purposes of the Green Belt are supported as they reflect the guidance of PPG2, especially as they do not relate to the delivery of open space or the safeguarding of residential amenity.

The two distinctive types of Green Belt identified in para 7.21 are however an interpretation of landscape guidance and planning history that do not relate to the Green Belt identified on the proposals map. To be able to be demonstrated as specific Green belt considerations these areas should be named on the proposals map for reference purposes.

Indeed the explanation of Ancient Arden and Green Wedge Green Belts conflicts with the interpretation of previous planning policy by the Planning Department and therefore this issue should be resolved through this document by identification of these areas.

Officer Recommendation No change

Park Hill Lane

Representor number **REP-0015**

Representor : **Mr Alan Cooper**

Agent Details Company: **RPS**

Contact: Kathy Else

Representation number: **1683** Representation in regard to : **7.20**

Verbatim Submission

Section 7 specifically considers Coventry's Green Belt in relation to its purpose, role and functions. The four purposes of the Green Belt are supported as they reflect the guidance of PPG2, especially as they do not relate to the delivery of open space or the safeguarding of residential amenity.

The two distinctive types of Green Belt identified in para 7.21 are however an interpretation of landscape guidance and planning history that do not relate to the Green Belt identified on the proposals map. To be able to be demonstrated as specific Green belt considerations these areas should be named on the proposals map for reference purposes.

Indeed the explanation of Ancient Arden and Green Wedge Green Belts conflicts with the interpretation of previous planning policy by the Planning Department and therefore this issue should be resolved through this document by identification of these areas.

Officer Recommendation No change

Representation number: **1684** Representation in regard to : **7.21**

Verbatim Submission

Section 7 specifically considers Coventry's Green Belt in relation to its purpose, role and functions. The four purposes of the Green Belt are supported as they reflect the guidance of PPG2, especially as they do not relate to the delivery of open space or the safeguarding of residential amenity.

The two distinctive types of Green Belt identified in para 7.21 are however an interpretation of landscape guidance and planning history that do not relate to the Green Belt identified on the proposals map. To be able to be demonstrated as specific Green belt considerations these areas should be named on the proposals map for reference purposes.

Indeed the explanation of Ancient Arden and Green Wedge Green Belts conflicts with the interpretation of previous planning policy by the Planning Department and therefore this issue should be resolved through this document by identification of these areas.

Officer Recommendation No change

Representation number: **1685** Representation in regard to : **5.12**

Verbatim Submission

The paragraph states that the City Council has accepted the recommendations of the Joint Green Belt Study. Concerns have already been expressed to the City Council over the lack of any public/stakeholder involvement in the production of the study and genuine concerns over its methodology and findings. It is not therefore agreed with that the study can be relied upon as the paragraph indicates to demonstrate exactly where Green Belt releases should take place.

Officer Recommendation

No change. However officers have advised consider submitting planning application for one dwelling to enable remainder of site to be brought into use as a community woodland. This would consolidate very special circumstances because public access would be achieved to this green belt area maximising its positive use and could constitute very special circumstances for dwelling.

Park Hill Lane

Representor number **REP-0015**

Representor : **Mr Alan Cooper**

Agent Details Company: **RPS**

Contact: Kathy Else

Representation number: **1686** Representation in regard to : **5.12**

Verbatim Submission

The Emerging Core Strategy identifies Green Belt variations in the form of immediate minor boundary alterations at Wood End for a regeneration programme and along Cromwell Lane, the latter of which will effectively remove residential dwellings from the Green Belt and is not validated by special circumstances.

The emerging document however identifies the area of Green Belt to the rear of these dwellings as safeguarded land for long term development needs. Although this wider designation does help to justify the removal of the dwellings from the Green Belt in the long-term, it still does not demonstrate that the openness of the Green belt will not be harmed in the interim. This is especially relevant if the safeguarded site to the rear does not come forward for development in the plan period.

The Green Belt boundary variation proposed at Cromwell Lane through the Emerging CS is not considered to be a strategic requirement, worthy of amendment through the CS document. The existing residential development along Cromwell Lane effectively amounts to urban sprawl whilst the removal of dwellings from the Green Belt directly encroaches upon the open countryside and reduces the Meriden Gap. Amendments that are relatively small like these and not of strategic importance should not be dealt with through the Core Strategy document but rather through site specific considerations when the Proposals Map is being reviewed and the Site Allocations Development Plan Document prepared.

Officer Recommendation

No change. However, officers have advised the representor to consider submitting planning application for one dwelling to enable remainder of site to be brought into use as a community woodland. This would consolidate USC because public access would be achieved to this green belt area maximising its positive use.

Representation number: **1687** Representation in regard to : **4.4**

Verbatim Submission

The strategic Vision and Objectives 'Outcome 6 indicates there should be a good choice of housing to meet just the needs of Coventry.

Whilst it is appropriate that the text refers to having a good choice of housing etc. by referring only to the housing needs of Coventry it fails to acknowledge the City's Major Urban Area and sub-regional role as identified with the RSS.

The City has been identified as a growth point which, through cross boundary working with the neighbouring authorities of Warwick and Nuneaton, is capable of delivering a level of housing growth beyond just its own housing demand requirements.

Officer Recommendation

No change

Retail

Representor number **REP-1013**

Representor : **Iceland**

Company: **Iceland Food Limited**

Agent Details Company: **Edmund Kirby**

Contact: Mr Edward Landor

Representation number: **1760** Representation in regard to : **6.83**

Verbatim Submission

The Core Strategy Proposed Submission refers to RSS Preferred Option Policy indicative measure of 95,000sqm gross comparison floorspace for Coventry City Centre between 2006 and 2021. However the Core Strategy does not make it clear that this RSS is in fact a Draft Submission and remains subject to an Examination In Public (EIP) on 28th April 2009. This results in a mis-representation of evidence.

Officer Recommendation No change

Representor number **REP-1103**

Representor : **Tesco**

Company: **Tesco Stores**

Agent Details Company: **DPP LLP**

Contact: Mr Antony Cook

Representation number: **2067** Representation in regard to : **9.10**

Verbatim Submission

Coventry City Council Local Development Framework: Core Strategy Representations. We have been instructed by our client, Tesco Stores Ltd., to submit representations to the Core Strategy: Proposed Submission document, which is presently out for consultation. We have previously made representations on behalf of Tesco to the 'Core Strategy - The Options' document in July 2007, and the 'Coventry's Future - Emerging Core Strategy' document in November 2008. We have also submitted representations on behalf of our client to the Jerde Masterplan document.

Officer Recommendation Support welcomed.

Representor number **REP-1113**

Representor : **Spenn Hill**

Company: **Spenn Hill Developments Ltd**

Agent Details Company: **DPPLLP**

Contact:

Representation number: **2255** Representation in regard to : **9: Achieving sustainable Communities and a Better Sense of Place**

Verbatim Submission

We have been instructed by our client, Spenn Hill Developments Limited, to submit representations to the Core Strategy: Proposed Submission document, which is presently out for consultation. We have previously made representations on behalf of Spenn Hill to the 'Core Strategy The Options' document in July 2007, and the 'Coventry's Future - Emerging Core Strategy' document in November 2008. We have also submitted representations on behalf of our client to the Jerde Masterplan document.

Representations

Having reviewed the 'Core Strategy: Proposed Submission' document, our representations largely reiterate those submitted on behalf of Spenn Hill during earlier stages of consultation. Spenn Hill support the principle of further investment in Coventry City Centre, we consider that focussing all of the required retail capacity toward the City Centre will be to the detriment of the City's other centres. Whilst we support the aspirational improvements to the City Centre, we consider the Core Strategy should seek to support all centres within the retail hierarchy.

Spenn Hill support the expansion of boundaries of all Centres to include space for further development, thus widening their role in accordance with PPS6. However, it is further stated that no significant expansion of Major District or District Centres beyond existing commitments is considered appropriate (Para. 9.10). We consider this portrays a rather conflicting message, and as stated above consider that focussing retail capacity exclusively towards the City Centre will have a negative impact on the City's other centres.

Officer Recommendation No change

SG10

Representor number **REP-1092**

Representor : **West Midland RSL**

Company: **West Midlands RSL Planning Consortium**

Agent Details Company: **Tetlow King Planning**

Contact:

Representation number: **2030** Representation in regard to : **Policy SG 10: Housing Needs and Mix**

Verbatim Submission

We welcome the provisions of Policy SG 10, but recommend that further policy include those points introduced in the supporting text on page 50. At present, the Core Strategy relates poorly to the needs of the elderly, in particular in terms of care and housing. Policy SG 10 should propose prioritisation of development proposals relating to housing for the elderly, including support for older people living independent lives in their own homes, sheltered housing, extra care housing, residential care homes and continuing care retirement communities.

In addition to the requirement for 10% executive homes, we strongly recommend the same target figure be required for developments to meet Lifetime Homes standards. This will improve the policy's soundness in relation to providing sufficient quality housing to meet all needs within Coventry City.

Implementation and Monitoring Framework. We recommend that affordable housing developments be exempt from planning obligations. We consider

that because 100% affordable housing schemes are primarily delivered for residents already living in the City Council area, they should not be liable for the same level of contributions as general market housing schemes. Circular 05/05 states that all contributions should be 'fairly and reasonably related in scale and

kind to the proposed development'. We would like this to be taken into account within the Core Strategy, and for this to then be further developed within the proposed supplementary planning document.

Officer Recommendation

No change.

SG2

Representor number **REP-1054**

Representor : **Mr Robert Jays**

Company: **William Davis Ltd**

Representation number: **1915** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

William Davis Ltd welcome the insertion in policy SG2 that sustainability requirements will be required "Unless it can be demonstrated on technical or economic viability grounds to be unachievable". Flexibility for the council to forgo these sustainability requirements in such circumstances is vital.

However William Davis consider that such flexibility does not remove the need for more generic testing of viability in a policy development context. The supplement to PPS1 'Planning and Climate Change' states in paragraph 33 that when considering requirements for decentralised energy supply to new development or for sustainable buildings local planning authorities must "ensure what is proposed is evidence-based and viable, having regard to the overall costs of bringing sites to the market and the need to avoid any adverse impact on the development needs of communities". As far as we are aware the requirements for sustainable buildings established in Policy SG2 of the proposed Core Strategy have not been tested on a generic basis and proven to be viable. The policy is therefore inconsistent with national planning policy.

Officer Recommendation No change.

Representor number **REP-1064**

Representor : **Mr James Stevens**

Company: **Home Builders Federation**

Representation number: **1942** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

On behalf of the HBF I submit the following reps on policy SG2 which I would like to be considered as part of the examination:

The policy is undeliverable. It represents a steep acceleration in the national programme for the Code for Sustainable Homes. Moreover, the agreed timetable only applies to Part L relating to energy efficiency. This policy covers all other elements.

The policy ignores the supplement to PPS 1 which requires under paragraph 11 to not duplicate building regs.

The policy also disregards paragraph 26 which requires an assessment of the feasibility of renewable energy and low carbon technologies.

The policy is over prescriptive and thus contravenes paragraph 26(i) preventing consideration of other more cost effective approaches.

It also contravenes paragraph 33 in not being evidence based and having regard to viability. This policy will undoubtedly undermine any regeneration ambitions the council may entertain for Coventry.

We would also draw attention to PPS 1 which states in paragraph 26(iii) that LPAs should not impose disproportionate costs in terms of environmental and social impacts on development or constrain otherwise beneficial development.

Paragraph 26(iv) also requires councils to consider the resources available for implementation and the costs to be incurred.

With regard to the provisions for decentralised energy, the costs imposed on new housing are disproportionate and the consequences for those in housing need should delivery be impaired should be spelt out in the Core Strategy if this policy objective is one the council feels it cannot be flexible over.

The HBF and the industry is committed to the programme for the CSH insofar as this relates to energy performance.

However this policy is disproportionate and will severely undermine the deliverability of housing.

We conclude that the policy is unsound.

Officer Recommendation No change.

SG2

Representor number **REP-1092**

Representor : **West Midland RSL**

Company: **West Midlands RSL Planning Consortium**

Agent Details Company: **Tetlow King Planning**

Contact:

Representation number: **2028** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

We strongly recommend the removal of the point 6 of Policy SG 2 under Planning for Climate Change. This point, requiring all developments to be carbon neutral, appears to be in conflict with the previous points on renewable energy. Though we are supportive of the aim for carbon neutrality, we consider at this stage, particularly considering the difficult economic climate, that this requirement to be unnecessarily onerous.

We also recommend that point 4 be amended to read:

All developments of more than 100 units will be encouraged to adopt community heat and power systems or alternative on-site renewable energy sources, where economically viable.

This will introduce an element of flexibility into the strategy. It should be noted that social housing must already meet Code Level 3 of the Code for Sustainable Homes standards, and thus will already be working towards meeting such aims.

Officer Recommendation

Minor change. Amend policy SG2 as follows - delete "be expected to" from first bullet "are expected" 3rd "be expected" to 4th, "are expected" 6th bullet.

SG2/Duggins Lane

Representor number **REP-1095**

Representor : **Samuel Smith**

Company: **Samuel Smiths Charity**

Agent Details Company: **Barton Wilmore**

Contact: John Pearce

Representation number: **2046** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

Whilst we do not object in principle to the policy we do not feel that the requirement for all developments of more than 50 dwellings to investigate community heat and power systems and for all developments of 100 or more units to adopt community heat and power systems is appropriate.

We feel that the threshold for when community heat and power systems will need to be incorporated is too low and that it will lead to certain schemes becoming unviable as a result. The thresholds proposed appear to be arbitrary and not founded on a credible evidence base and as such we consider the policy unsound. Whilst we agree that the potential for the use of such systems should

be investigated we suggest that the threshold for when such systems would be required is increased to larger developments such as sustainable urban extensions of over 500 dwellings subject to this being confirmed through an appropriate study that looks at the viability of such schemes and the benefits that it delivers.

Officer Recommendation No change

Representation number: **2048** Representation in regard to : **TABLE 2: COMPONENTS OF HOUSING SUPPLY 2006 TO 2026**

Verbatim Submission

We support the identification within Table 2 of land at Duggins Lane as a Green Belt Allocation being suitable to accommodate approximately 50 dwellings.

Officer Recommendation Support welcomed.

Representation number: **2050** Representation in regard to : **TABLE 2: COMPONENTS OF HOUSING SUPPLY 2006 TO 2026**

Verbatim Submission

We support the identification within Table 2 of land at Duggins Lane as a Green Belt Allocation being suitable to accommodate approximately 50 dwellings.

Officer Recommendation Support welcomed

Representation number: **2051** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

The policy states that in the first part of the plan period new residential development will be focussed on previously developed land (POL) within the built up area unless a specific need is identified which cannot be met in any other way. It then goes on to state that monitoring will ensure that a five year supply of housing land suitable to meet the city's needs can be provided and that

only when this cannot be achieved within the built up area will safeguarded land be released. The way the policy and supporting text is worded alludes to, but is not explicit to the fact that if there is an identified specific need for housing which cannot be met on POL land then safeguarded land could be released to meet this need. The supporting text and paragraph 6.35 recognises an identified need to provide family and higher end housing within the City which is further supported

by paragraph 6.46 but the policy does not state that if this specific identified need cannot be provided on POL sites then safeguarded land could be released. Whilst we agree that the emphasis should be on developing POL sites first we seek the flexibility that Policy SG6 can be interpreted in that if family and executive housing cannot be provided on POL sites then safeguarded land can be released to meet this specific need.

Officer Recommendation No change.

SG2/Duggins Lane

Representor number **REP-1095**

Representor : **Samuel Smith**

Company: **Samuel Smiths Charity**

Agent Details Company: **Barton Wilmore**

Contact: John Pearce

Representation number: **2052** Representation in regard to : **TABLE 3: ALLOCATED HOUSING SITES**

Verbatim Submission

We support the identification of land at Duggins Lane as safeguarded land being able to deliver approximately 50 dwellings. Whilst we support the inclusion within the Core Strategy of this allocation it only represents approximately half of the land that we originally promoted for a housing allocation. Please see detailed separation representations to Table 2 that further explain our position.

Officer Recommendation No change

Representation number: **2054** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

We object to the wording of Policy SG8 as it is not consistent with provisions of Policy 5G6. Policy 5G6 states that the Council will seek to focus new housing development on POL sites unless there is a specific identified need that cannot be met on POL sites within the urban area and that if this is the case then safeguarded land could be released to meet this need. Policy 5G6 contains an

exception to where the focus for new housing development should be on POL i.e. when there is a specific need which cannot be provided on POL sites.

Policy 5G8 on the other hand contains a more restrictive criterion that states that safeguarded land will only be released when there are insufficient sites to meet the five year land supply. There is nothing within Policy 5G8 that identifies those exceptions when safeguarded land could be released as is the case with Policy 5G6. As such we propose that Policy 5G8 is deleted as we feel that the

provisions of the policy are covered in Policy 5G6.

If it is determined that Policy 5G8 is not deleted then we request that it is reworded so that it is in conformity with Policy 5G6 so that it states that safeguarded land may be released if there is an identified need for a specific type of housing that cannot be provided on existing POL sites.

Not only is Policy 5G8 not consistent with Policy 5G6 but also Policy EQ2 which also states that safeguarded land will not be released unless it is demonstrated that no more suitable sites are available within the built-up area to meet a specific identified need. Policy 5G8 should either be deleted or re-worded so that it is consistent with both Policy 5G6 and EQ2.

Officer Recommendation

Minor change. Policy SG8 Amend second paragraph to read: "priority given to those on previously-developed land unless a specific need is identified which cannot be identified in any other way. Reserved sites"

SG2/Duggins Lane

Representor number **REP-1095**

Representor : **Samuel Smith**

Company: **Samuel Smiths Charity**

Agent Details Company: **Barton Wilmore**

Contact: John Pearce

Representation number: **2055** Representation in regard to : **Policy SG 12: Residential Density**

Verbatim Submission

Whilst we generally support the policy in that it is not prescriptive in terms of achieving specific densities for new housing in certain locations. We feel that the list of factors to be taken into account should also include housing choice. At paragraph 6.46, it is recognised there is a need for more executive and family housing. By its very nature, this type of housing may not make the most

efficient use of land when compared with an apartment scheme for example, but in order to meet this specific identified need, housing choice should therefore be taken into account when considering such proposals.

Furthermore Paragraph 6.57 states in certain parts of the City the character of the area is formed by lower density development and that such development plays a major role in providing a choice in housing. As such we support the ability within the policy to seek residential densities that are appropriate for the location and in context with the existing built form.

Guidance in paragraphs 46 and 47 of PPS3 states that where local planning authorities wish to plan for new residential developments at less than 30 dwellings per hectare this will need to be justified in terms of the spatial vision and strategy for housing development in their area, the capacity of local infrastructure, the desirability of using land efficiently, accessibility, the characteristics of the

area and the desirability of achieving high quality well designed housing. Policy H8 of the adopted Coventry Development Plan made specific reference to density assumptions that allocated housing sites should achieve. We feel that a similar policy would enable the Council to better direct the type and form of housing that was needed and required in certain areas of the city.

In the case of land at Duggins Lane, due to its location we feel that this site would be appropriate for development at the lower end of the density range and could be justified accordingly and should be identified as such within the Core Strategy, in order to meet the identified need for family and executive housing, subject to there being no PDL sites available that could meet this specific need.

Officer Recommendation No change

Representation number: **2056** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission

We support the part of the policy where it states that land at Duggins Lane will be removed from the Green Belt and protected in the interim as 'Safeguarded Land',

Officer Recommendation Support welcomed

Representation number: **2057** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

We support the statement within the Policy that those sites identified in Table 3 will be allocated for residential development.

Officer Recommendation Support welcomed.

SG2/Retail

Representor number **REP-1077**

Representor : **WM Morrison Supermarket PLC**

Company: **WM Morrison Supermarkets PLC**

Agent Details Company: **Peacock and Smith Ltd**

Contact: Robert Smith

Representation number: **1998** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

With reference to the above and on behalf of our client, Wm Morrison Supermarkets Plc (Morrisons), we write to thank you for providing us with an opportunity to comment on the submission draft Core Strategy document for Coventry. Morrisons is a major food and grocery store operator, which currently operated stores at Holyhead Road, Coventry and Brandon Road, within Brandon Road District Centre, Binley. The company would therefore like to be kept informed and consulted on further stages of preparation of documents which are to comprise the Local Development Framework, particularly with regards to any new retail allocations in Coventry.

Our client would like to make comments on the above document, The reasons for this are explained in more detail below.

Renewable Energy.

We note the Policy SG2; Sustainability states that (inter-alia):

"All developments of more than 1000sq.m floorspace must incorporate on-site generation of energy from renewable sources and energy design measures to off-set at least 10% of predicted carbon dioxide emissions".

Our client considers that requirements relating to on-site energy production should incorporate an element of flexibility to allow for circumstances where it will be viable or suitable to incorporate renewable energy equipment to reduce CO2 emissions by the target percentage.

Our client acknowledges that paragraph 8 of PPS22, states that local planning authorities may include policies in Local Development Documents that require a percentage of energy requirements to come from onsite renewable energy generation. However, the caveat to this is that policies:

(i) Should ensure that requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy equipment is viable given the type of development proposed, its location and design; and

(ii) Should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation.

It is acknowledged that a number of authorities are seeking a percentage of onsite renewable energy generation in new development. In some cases, these requirements are not subject to any such caveat, as directed by PPS22, and as such resulting policies may be considered unsound at Examination.

Any such policy must have regard to the viability of a scheme. There should certainly be scope of flexibility within policy as by unduly onerous requirements on developers, many development schemes may be considered as unviable which is likely to lead to a direct loss of potential investment and regeneration in the borough.

We trust that this is helpful and would be grateful if you could ensure that Peacock and Smith are kept informed of the progress of the LDF. If you have any queried, please contact Peacock and Smith at the address overleaf.

Officer Recommendation No change.

Representation number: **2001** Representation in regard to : **Policy SC 1: The Network of Centres**

Verbatim Submission

Given that the Morrisons store at Brandon Road forms part of the above centre in the Coventry Development Plan (2001), we assume that that it will continue to do so in the Local Development Framework. As explained in our letter dated 30 August 2007, in relation to the Issues and Options Draft Core Strategy, we also understand that the Council wishes to encourage appropriate development of a vacant area of land adjacent to our client's store. The Council should clarify and justify within the Local Development Framework its intentions for this land, bearing in mind its proximity to our client's store and the District Centre generally.

Officer Recommendation No change - It is within the boundary of Brandon Road District Centre.

SG6

Representor number **REP-1054**

Representor : **Mr Robert Jays**

Company: **William Davis Ltd**

Representation number: **1920** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

William Davis Ltd objects to the proposed restriction on the release of 'safeguarded land' allocations. Whilst we understand the concern to ensure that priority is given to the release of previously developed land PPS3 does not prescribe a strict sequential approach but instead requires that emphasis is placed on the effective delivery of housing to meet requirements. This reflects the Government's objectives to improve the affordability and supply of housing and to create sustainable inclusive mixed communities. We consider that the strict control proposed over the release of safeguarded land, with deficit in 5 year land supply proposed as the trigger, will not ensure the effective delivery of the required quantum of housing in Coventry. It therefore conflicts with the above objectives for improved delivery and improved affordability of housing, set out in national policy, and will compromise the Council's own strategic vision and objectives and as such will not be 'effective'. As a consequence the Policy is unsound in these terms

The minimum requirement for housing to be accommodated in the city for the period to 2026 (33,500 dwellings), in the emerging RSS Revision, is a very high figure. As acknowledged in Policy SG6 it will require a step change in housing land release and delivery. Because of this position, we consider that the City Council needs to make positive provision for the timed release of the safeguarded land to give certainty to the effective delivery of these required housing numbers. A number of the safeguarded sites, and particularly the Keresley eco-suburb, will require major commitment from the proposed developers to bring the land forward. To establish this commitment will require confidence and certainty on both sides to ensure effective delivery. There is a substantial risk that this will not happen unless there is a firm timetable for these sites to come forward.

Officer Recommendation

Minor change policy SG6. Amend fourth bullet point to read: "Reserved land"
Amend second sentence of third paragraph to read: "only when this cannot be achieved within the built up area of the City will reserved land"

Representor number **REP-1092**

Representor : **West Midland RSL**

Company: **West Midlands RSL Planning Consortium**

Agent Details Company: **Tetlow King Planning**

Contact:

Representation number: **2029** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

We support Policy SG 6. The provision and retention of affordable housing should be a particularly high priority for the Core Strategy.

Officer Recommendation

Support welcomed.

Representor number **REP-1054**Representor : **Mr Robert Jays**Company: **William Davis Ltd**Representation number: **1919** Representation in regard to : **Policy SG 8: Release of Housing Land****Verbatim Submission**

William Davis Ltd objects to the proposed restriction on the release of 'safeguarded land' allocations. Whilst we understand the concern to ensure that priority is given to the release of previously developed land PPS3 does not prescribe a strict sequential approach but instead requires that emphasis is placed on the effective delivery of housing to meet requirements. This reflects the Government's objectives to improve the affordability and supply of housing and to create sustainable inclusive mixed communities. We consider that the strict control proposed over the release of safeguarded land, with deficit in 5 year land supply proposed as the trigger, will not ensure the effective delivery of the required quantum of housing in Coventry. It therefore conflicts with the above objectives for improved delivery and improved affordability of housing, set out in national policy, and will compromise the Council's own strategic vision and objectives and as such will not be 'effective'. As a consequence the Policy is unsound in these terms

The minimum requirement for housing to be accommodated in the city for the period to 2026 (33,500 dwellings), in the emerging RSS Revision, is a very high figure. As acknowledged in Policy SG6 it will require a step change in housing land release and delivery. Because of this position, we consider that the City Council needs to make positive provision for the timed release of the safeguarded land to give certainty to the effective delivery of these required housing numbers. A number of the safeguarded sites, and particularly the Keresley eco-suburb, will require major commitment from the proposed developers to bring the land forward. To establish this commitment will require confidence and certainty on both sides to ensure effective delivery. There is a substantial risk that this will not happen unless there is a firm timetable for these sites to come forward.

Officer Recommendation

Minor change policy SG6. Amend fourth bullet point to read: "Reserved land"

Shilton Lane

Representor number **REP-1007**

Representor : **Hallam Land**

Company: **Hallam Land Management**

Agent Details Company: **Stoneleigh Planning Partnership**

Contact: Alasdair Jones

Representation number: **1736** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission

Does Policy SG6, Location and Scale of Housing Development adequately reflect the need therefore for a flexible approach towards the forward supply of housing land, as suggested by the above?

Firstly, there is no reference in the policy to the need to meet the minimum net requirement of 33,500 dwellings. Or more pertinently, the estimated minimum scale of provision within the City. That needs to be highlighted in policy. Secondly, the policy, in referring to the release of land for housing needs to relate to the policies in RSS that deal with the Phasing of New Development. The notion in Policy SG6 that residential development should be focussed on previously developed land and sites within the built up area in the first part of the plan period is not entirely in accord with the advice and policy in RSS for the following reasons;

Para 3.41 et seq of RSS deals with the strategy for Coventry - Warwickshire.

Para 3.45(c) deals with phasing housing land releases in the Coventry Major Urban Area (MUA). Priority is to be given to sustainable locations first and foremost and within that brown field sites before green field sites. The emphasis here is on identifying the most sustainable sites in the first instance, whereas the Core Strategy seeks to emphasise previously developed land and sites, irrespective of sustainability.

Para 6.30 et seq of RSS refers to the Phasing of New Development and to the relevant policy CF4. Para 6.32 notes that the distribution of housing proposals in the period to 2016 implies a quick increase in development rates within the West Midlands Conurbation (of which Coventry is a part) in the period to 2016 to support urban renaissance and the growth proposals of the City Region.

Within the early part of the plan period to 2016, housing completions need to be sufficient to ensure the early implementation of the strategy. That is to be achieved by maintaining and accelerating the progress of urban renaissance. Within sustainable locations, sites which are on previously developed land should be phased early in the plan period and in most circumstances before greenfield sites (my underlining). Where insufficient sites on previously developed land in sustainable locations are available to meet the trajectory of housing completions, then it would be in order to release greenfield sites. Each of the above matters are not fully reflected in Policy SG6. Nor is the text of Policy SG6 in accord with Policy SG8; Release of Housing Land. Policy SG8 refers to sites in the urban area being phased early in the plan period with priority given to those on previously developed land.

Officer Recommendation No change.

Representation number: **1737** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

HALLAM LAND MANAGEMENT CONSIDER THAT THERE IS SUFFICIENT EVIDENCE AVAILABLE TO THE COUNCIL TO INCLUDE THE WHOLE OF THE SHLAA SITE 305/305A WITHIN THE LIST OF ALLOCATED SITES IN TABLE 3.

Officer Recommendation No change

Shilton Lane

Representor number **REP-1007**

Representor : **Hallam Land**

Company: **Hallam Land Management**

Agent Details Company: **Stoneleigh Planning Partnership**

Contact: Alasdair Jones

Representation number: **1738** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission

The table with Policy CF4 of RSS suggests that within the West Midlands conurbation, the aim is to increase housing completions rates by 16% over the period to 2016 when compared to the rates sustained 2005 - 2006 (i.e. 8000 p.a. compared to 6,900 2005/6).

Table 5.10 of the Council's Annual Monitoring Report states that the aim is to get housing completions up to 1,744 dwellings per annum (see note to Table 5.10, copy attached). Table 6 of the SHLAA suggests this will not be achieved through the period to 2016. Over the period 2008 - 2018, this shows the anticipated average build rate will be 1,480 dwellings.

The anticipated step change in delivery rates in Coventry, as outlined in Table 6 to the SHLAA, will not achieve the higher rates of provision and earliest implementation of the RSS Strategy as required by Policy CF4 of that strategy. This is, in part, due to the intention, as set out in the SHLAA to programme the delivery of the SHLAA sites component of the forward supply across the plan period in three distinct phases. This position can be remedied by bringing forward some of the 2018 - 2023 SHLAA sites into the earlier years of the plan such as the site at Shilton Lane which is deliverable during the period to 2016. Similarly, a number of the housing allocations could also be brought forward and HLM have in mind Shilton Lane in that context, given the nature of the submission at para 3.5 above.

For Policy SG8 to be considered sound, therefore, it needs to clearly demonstrate;

- a. How the various components of the supply in Policy SG6 will contribute to the programme for housing development in the City over the period to 2026 and beyond based on Table 6 in the SHLAA.
- b. The anticipated programme for delivery from the Regeneration Sites, the Housing Allocations etc and on a site by site basis.
- c. How the expected step change in delivery rates will be achieved across the City, particularly over the period to 2016.
- d. Where there is flexibility in the forward supply to rectify shortfalls that may arise over the period to 2026, in order to secure the acceleration in provision as required by RSS. Where some of these matters are detailed in the evidence base, then the policy should clearly refer to those and such tables and chapters and/or paragraphs in them.

Officer Recommendation No change

Sutton Stop

Representor number **REP-1086**

Representor : **Michael Walder**

Representation number: **2019** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

1) The road inferstruction is totally unsuitable for this project , Grange road has already far to much traffic from all the other close developments . We have over 750 houses built at the north end of Grange Road, in addition over 300 houses built on the Foxford School grounds. You closed Hurst Road to traffic leaving Oakmoor Road to carry all this traffic, this road was built as a relief road, hardly anymore a relief road if you block the other one off . All the traffic from Bulkington and Nuneaton filter s in via Jacker 's Road adding further problems to traffic volumes in Grange Road and Oakmore Road .

2) Are you really interested in the conservation of Sutton Stop, as a person who built the first surfaced road into Sutton Stop , contrary to other peoples claims, I find them hard work done b y certain people totally undermined by insensitive developments that have already been allowed . Who wants more awfull three storey houses, built in this historic site. Who sanctioned those already built should hang their head in shame.

You have a real gem in your hands, the charm was it's simplicity turning it into a housing estate would finally destroy what little is left. I can see vast tracks of land in the south Coventry area, many brown fiel sites allover Coventry if you open your eyes.

Longford has for generations been the dumping ground for unwanted schemes by this City Council, the message from Longford is Hands Off.

Officer Recommendation No change

University Hospital

Representor number **REP-1041**

Representor : **Mr Paul Crofton**

Company: **UHCW**

Agent Details Company: **David Lock Associates**

Contact: Mr David Keene

Representation number: **1864** Representation in regard to : **Policy SG2 - Sustainability**

Verbatim Submission

This policy demands sustainability performance standards for residential development that are undefined, not capable of definition and not supported in national policy guidance. It also requires the incorporation of energy systems that are not viable or proven against the defined thresholds. It would be unwise to proceed with a policy that is incapable of implementation and proper monitoring.

Officer Recommendation No change

Representation number: **1865** Representation in regard to : **7.32**

Verbatim Submission

UHCW NHS urgently requires a second access. The problems of providing access to the Hospital for emergency blue light vehicles is well-documented. The Highways Agency has stated on numerous occasions that a direct access from A46 will not be allowed. The Hungerly Hall option is the only realistic alternative access option. UHCW strongly supports this proposal and will be bringing forward a planning application to deliver this essential infrastructure at the earliest opportunity.

Officer Recommendation Support welcomed.

Representation number: **1866** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

Table 3: Allocated Housing
The table should reflect the accurate capacity of the site based upon the capacity analysis undertaken by the promoters. Extensive discussions have taken place with the City Council which confirm the capacity as about 800 units. This is based upon a more extensive site area than is shown on the Proposals Map (a separate representation refers to the Proposals Map).

Officer Recommendation Minor change table 3 amend Walsgrave Hill Farm number of dwellings to 800.

Representation number: **1867** Representation in regard to : **5: Spatial Strategy**

Verbatim Submission

The DPD is issued because it properly shows a new access to UHCW NHS which is desperately needed to ensure that ambulances and emergency vehicles can access the Hospital with the minimum of delay and reduce the potential risk to patients caused by traffic congestion.

Officer Recommendation Support welcomed.

Representation number: **1868** Representation in regard to : **Proposals Map**

Verbatim Submission

Proposals Map
The Proposals Map does not accurately reflect the full spatial extent of the land available for residential development on land outside the Green Belt. A Development Framework has been prepared which reflects the site boundaries agreed with Coventry City Council and that has been the subject of an extensive public consultation exercise with the local community. The boundary encloses more land to the south of the site. A copy of the Development Framework is attached.

Officer Recommendation Agreed. Amend proposals map accordingly.

Walsgrave Hill Farm

Representor number **REP-1108**

Representor : **Mr David Keyse**

Company: **Gallagher**

Representation number: **2077** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission

The identification of Site 16 as an Allocated Housing Site is sound given that it is in a highly sustainable location, well related to the urban area, is partly previously developed land and is not within the Green Belt. The site is immediately available for development and can contribute towards meeting the Council's housing requirements

Officer Recommendation

Support welcomed.

Baginton

Representor number **REP-1000**

Representor : **Lenco Investments**

Company: **Lenco Investments**

Agent Details Company: **RPS Planning**

Contact: Mr P Hill

Representation number: **1688** Representation in regard to : **4.4**

Verbatim Submission

The strategic Vision and Objectives

Outcome 6 indicates there should be a good choice of housing to meet just the needs of Coventry.

Whilst it is appropriate that the text refers to having a good choice of housing etc. by referring only to address the housing needs of Coventry it fails to acknowledge the City's Major Urban Area and sub-regional role as identified with the RSS.

The City has been identified as a growth point which, through cross boundary working with the neighbouring authorities of Warwick and Nuneaton, is capable of delivering a level of housing growth beyond just its own housing demand requirements.

Officer Recommendation No change.

Representation number: **1689** Representation in regard to : **5.12**

Verbatim Submission

The paragraph (5.12) states that the City Council has accepted the recommendations of the Joint Green Belt Study. Concerns have already been expressed to the City Council over the lack of any public/stakeholder involvement in the production of the study and genuine concerns over its methodology and findings. It is not therefore agreed with that the study can be relied upon as the paragraph indicates to demonstrate exactly where Green Belt releases should take place.

Officer Recommendation No change.

Representation number: **1690** Representation in regard to : **5.13**

Verbatim Submission

Support is provided for the general aim of the paragraph which appropriately recognises the need for cross boundary housing provision into Nuneaton and Warwick.

However, reference to 7,000 dwellings must be treated as a minimum figure and recognition that the figure could increase as a result of the RSS process and a more rigorous examination of the land supply and methodology used in the draft Core Strategy.

Officer Recommendation No change

Representation number: **1691** Representation in regard to : **5.14**

Verbatim Submission

The last sentence stating that the premature release of greenfield land can aggravate market conditions does not have regard to prevailing housing market conditions and the need to ensure delivery of a suitable range of housing and a five year housing land supply.

RPS advocates that the CS should be able to demonstrate that housing is deliverable and continuous and may benefit from the inclusion of a housing trajectory. Such a trajectory should, however, not demonstrate how particular areas in and around the City are restricted from providing homes but the manner in which the CS seeks to bring forward key development opportunities early in the plan period to facilitate a stimulus in house building in sustainable locations.

Unless the approach to housing delivery adopts a more positive approach to the early release of greenfield sites, the Government's national priority of securing an adequate supply of housing will not be realised. The current strategy and over-reliance on PDL was produced in a pre-downturn era and bears no resemblance to the realities and necessity to provide a flexible plan which can positively respond to housing delivery.

In such circumstances housing delivery should not be constrained by an outdated sequential approach principle and be based upon delivering the most sustainable opportunities early.

Officer Recommendation No change

Baginton

Representor number **REP-1000**

Representor : **Lenco Investments**

Company: **Lenco Investments**

Agent Details Company: **RPS Planning**

Contact: Mr P Hill

Representation number: **1694** Representation in regard to : **6.77**

Verbatim Submission

The paragraph (or indeed anywhere in the CS) fails to acknowledge the importance and role which Coventry Airport and the substantial employment areas and trading estates around the airport currently provide as one of the most significant work locations for residents of Coventry.

Whilst Stonebridge Trading Estate is indicated on Map 5 (site 49) the significance of the employment opportunities to Coventry's economically active residents provided from Coventry Airport and Middlemarch Business Park has been overlooked, despite these locations adjoining Coventry's administrative boundary.

Whilst this specific point relates to land around Coventry Airport, the importance of other employment locations around (but outside) the City, such as the Ansty Development and Warwick University should also be recognised in the Core Strategy.

The Airport and Business Park is a sub-regionally significant employment location attracting significant employment opportunities and being home to major companies such as Parcelforce's national/international distribution hub as well as numerous other major employment generators.

This point is recognised in the October 2008 Economic Assessment Report of Coventry by the West Midlands Regional Observatory, which specifically recognises on page 15 the importance of the Middlemarch Business Park to the economy of Coventry.

This lack of recognition appears to be because the Coventry Airport/Middlemarch Business Park location is in Warwick District. However, for the reasons stated above this fails to recognise the functional relationships this area has to the economy of Coventry, which clearly warrants recognition through the spatial plan for the area.

Officer Recommendation No change

Baginton

Representor number **REP-1000**

Representor : **Lenco Investments**

Agent Details Company: **RPS Planning**

Company: **Lenco Investments**

Contact: Mr P Hill

Verbatim Submission

Support is provided for the joined up approach taken towards the instruction to produce a sub-regional Green Belt Study. RPS also acknowledges the specific Coventry Green Belt Review work.

However, the views expressed in the paragraph that the Joint Green Belt Review document is 'comprehensive' cannot be agreed with. Written concerns have already been raised with the City Council over the lack of consultation on the document's preparation and robustness of its methodology.

The document's assessment of land parcels around the City boundary does cause considerable concern. Whilst it is acknowledged there is a need to define land parcels, the methodology used for the identification of land parcels selected for the study analysis has not been explained. There are several examples of where a more refined approach would have resulted in different land parcels (from that concluded in the study) being selected for the secondary assessment and in RPS view being identified as 'least constrained'.

A specific example of this relates to land parcel C11a, which covers a wide area and was not 'shortlisted' or 'taken forward' for further analysis in the study.

This is despite the parcel having exactly the same identified primary and secondary constraints as parcel C10a, 'situated across the road', which the study does indicate as being 'least constrained'.

Both areas are also covered by the same topographical analysis, landscape character areas (Dunsmore and Feldon) and Landscape Character Type (Feldon Plateau Farmland).

This is in contrast with C11a and C11b which the study's objective constraints assessment reveals marked differences with two areas, with C11b for example having several secondary constraint features and a notable ridgeline running through the site (in the topographical analysis).

In RPS's view this analysis demonstrates that C11a (along with C10a) should have been taken forward into the secondary assessment, in contrast to site C11b. However, for unexplained reasons, the Analysis Schedules (assessment process) has grouped site C11a and C11b together. The above indicates that Site C11a should have been assessed independently of Site C11b.

The study's own analysis therefore demonstrates that land parcel C10a and C11a are very similar, in contrast to site C11b. RPS fully accepts the airfield and associated land (C10a) is appropriate to identify as a single land parcel, however the same cannot be said for C11a. As the City Council is aware Lenco Investments has been promoting a well defined area of some 50ha of land with wider C11a which as its own detailed assessment has revealed (see RPS document Land South of Baginton - A Sustainable Extension (submitted to the City Council)) its constraint free nature and limited Green Belt and Landscape impact. However, the only two elements of Land Parcels C11a and C10a which differ (Green Belt Study Appendix 2) relate to preventing sprawl and preventing encroachment.

In RPS's view, had a more robust and refined approach to assessment of Land Parcel C11a been undertaken (in assessing Lenco Investments land interest in isolation from the wider C11a site and certainly not part of C11b), this would have revealed that due to the site's defensible boundaries and relationship to the airfield land a very comparable Green Belt purpose assessment to the airfield land (C10a) would have occurred, resulting in the land being assessed in the secondary assessment stage and being identified as 'least constrained'.

In RPS's view this demonstrates that the sub-regional Green Belt Study whilst well intentioned and informative in demonstrating that land does exist on a cross boundary basis has been undertaken at such a 'strategic high level' it cannot be considered as being 'comprehensive' for the purposes of identifying 'least constrained' areas of land.

In RPS's view further detailed, robust and transparent assessment should therefore be undertake

Baginton

Representor number **REP-1000**

Representor : **Lenco Investments**

Agent Details Company: **RPS Planning**

Company: **Lenco Investments**

Contact: Mr P Hill

Officer Recommendation No change

Representation number: **1696** Representation in regard to : **Policy SG 6: Location and Scale of Housing Development**

Verbatim Submission Policy provides no indication of how land will be provided or phased on a cross boundary basis.

In the absence of any formal joint Core Strategy with Warwick/Nuneaton it is essential that the Policy acknowledges that development will be provided in Warwick/Nuneaton and also states how much development will be provided on a cross boundary basis and when that development will be delivered.

Officer Recommendation No change.

Representation number: **1697** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission The policy is not deliverable being far too restrictive and fails to acknowledge that strategic sites can themselves deliver quality environments and related community facilities on a phased basis.

Officer Recommendation No change

Representation number: **1698** Representation in regard to : **Policy SG 8: Release of Housing Land**

Verbatim Submission The phasing policy is insufficiently specific, containing no timescales or references to specific sites.

Importantly the policy fails to even acknowledge that strategic sites within Warwick and Nuneaton do form part of the LPA's housing land supply.

As it stands there is no policy steer as to how sites to be located in Warwick or Nuneaton would be related and phased, this is despite calls for formal cross boundary working arrangements. This has now manifested itself in a Core Strategy which is unable to direct the timing or delivery of development (on a cross boundary basis) which is a fundamental component of Coventry's development strategy.

The fact that a site is located in a different authorities' administrative area should have no bearing upon the correct approach to the spatial planning of Coventry. For this reason it would be inappropriate to be completely silent on the issue as the CS currently is.

It is in no-ones interest to see the plan declared unsound at this stage on this basis and therefore as a practical solution it is recommended additional text is inserted at the end of the policy.

Officer Recommendation No change.

Representation number: **1699** Representation in regard to : **TABLE 2: COMPONENTS OF HOUSING SUPPLY 2006 TO 2026**

Verbatim Submission There is a lack of justification for significant elements of the housing land supply table. In particular its inclusion of land with permissions is contrary to PPS3 (paragraph 58).

Re-use of empty homes does not count as new dwellings and should therefore be removed entirely from the land supply.

Greater scrutiny of capacity from the SHLAA assumptions, regeneration schemes and housing allocations needs to be taken.

Officer Recommendation No change

Land at Baginton

Representor number **REP-1000**

Representor : **Lenco Investments**

Company: **Lenco Investments**

Agent Details Company: **RPS Planning**

Contact: Mr P Hill

Representation number: **1692** Representation in regard to : **6.28**

Verbatim Submission

Support is provided to the principle of development in Warwick and Nuneaton.

However, the term 'on the edge of' requires further clarification. It may be that land suitable for development in Nuneaton/Warwick itself does not physically adjoin the urban edge of Coventry, but is nevertheless extremely well located to the City.

Such land exists at Baginton in Warwick District, adjacent to Coventry Airport and the associated employment base. Development is extremely close to the urban extent of Coventry and would be delivering strategic housing needs of the City, but may not fulfil an 'on the edge of' criteria.

The RSS does not say the land must be 'on the edge.', it merely indicates (Table 1 footnote b) that land will be allocated in Warwick/Nuneaton to deliver Coventry's housing requirements.

In the absence of a formal Joint Core Strategy, it will be for the Core Strategies of Warwick/Nuneaton to determine which sites/locations within their administrative boundary are appropriate to deliver Coventry related growth.

Officer Recommendation

Minor change. Delete "on the edge of" and insert "adjacent to".

Representation number: **1693** Representation in regard to : **6.77**

Verbatim Submission

The paragraph (or indeed anywhere in the CS) fails to acknowledge the importance and role which Coventry Airport and the substantial employment areas and trading estates around the airport currently provide as one of the most significant work locations for residents of Coventry.

Whilst Stonebridge Trading Estate is indicated on Map 5 (site 49) the significance of the employment opportunities to Coventry's economically active residents provided from Coventry Airport and Middlemarch Business Park has been overlooked, despite these locations adjoining Coventry's administrative boundary.

Whilst this specific point relates to land around Coventry Airport, the importance of other employment locations around (but outside) the City, such as the Ansty Development and Warwick University should also be recognised in the Core Strategy.

The Airport and Business Park is a sub-regionally significant employment location attracting significant employment opportunities and being home to major companies such as Parcelforce's national/international distribution hub as well as numerous other major employment generators.

This point is recognised in the October 2008 Economic Assessment Report of Coventry by the West Midlands Regional Observatory, which specifically recognises on page 15 the importance of the Middlemarch Business Park to the economy of Coventry.

This lack of recognition appears to be because the Coventry Airport/Middlemarch Business Park location is in Warwick District. However, for the reasons stated above this fails to recognise the functional relationships this area has to the economy of Coventry, which clearly warrants recognition through the spatial plan for the area.

Officer Recommendation

No change.

Kings Hill

Representor number **REP-1010**

Representor : **Mr Robert Fryer**

Company: **Finham Residents Association**

Representation number: **1747** Representation in regard to : **6.28**

Verbatim Submission

Even as a cemetery while the area appears attractive for development on a map, it has a history of being rejected of being unfit for use as the land is waterlogged and floods. This is as the result of being the lowest point in Coventry and the Finham Brook collects the water from this natural basin. (See attached more detailed description) and higher up e.g. Canley, Kenilworth etc. This is reduced or flows back if the combined rivers Sowe and Sherbourne are high.

Officer Recommendation No change

Representation number: **1748** Representation in regard to : **6.28**

Verbatim Submission

- 1.The area is in the Green Belt and should remain so as it is valued as a way of avoiding urban sprawl and to balance out the development within the City.
- 2.There are protected ancient hedgerows along Green Lane and elsewhere - these should not be breached or removed. There are medieval village sites.
- 3.There is established biological species badges, crested newts, bats.
- 4.The land is used for agricultural and livestock use.
- 5.Currently there is a large nursery (Kings Hill) which helps disadvantaged children/adults.

Officer Recommendation No change

Representation number: **1749** Representation in regard to : **6.28**

Verbatim Submission

There are reports of a man being killed by falling down an old coal mine shaft about 20 years ago on Kings Hill. We are investigating this further and are surprised that it was not found when the relative values of the sites was carried out. Coal mining was extensive in the Coventry and surrounding areas and this land was part of the long established Stoneleigh Abbey before the dissolution. It is likely that there workings were abandoned in favour of say the 24 feet thick seam at Daw Mill etc (more productive).

Officer Recommendation No change

Representation number: **1750** Representation in regard to : **6.28**

Verbatim Submission

By siting these along our border it has been said that the established Finham area would be able to support the additional dwellings (up to 7,000 from Coventry overspill plus up to a further 10,800 from WDC). However, Finham is a very isolated area (cut off by the A45 and very limiting junctions across/onto it) and has narrow roads. It was earlier a separate settlement as part of Warwickshire and a more rural community. Sewer and other services were generally undersized compared to modern expectations. It has no equipped play facilities/ sports areas for children. There is no community centre, few shops and apart from the Harvester pub/food, Holiday Inn no real social provision. Our only place of worship (St Martin's C of E) tries to fill the gap, but hasn't to capacity to completely act as a community centre (which we did have until Coventry City pulled it down and sold off the land). We have a limited bus service, but many streets are too narrow to accommodate them and residents have to walk a considerable distance to catch one. Green Lane is bordered by a protected historical hedge which should mean that access through it pedestrian or vehicles should not be permitted - Green Lane also floods at times. The area is cut off and an increase of even a few houses would change its character and reduce what limited infrastructure exists. Proposals could result in the area increasing 4x (i.e. +6,000 dwellings) or more and adversely affect the area. The existing roads will not cope. It will be like the Royal Show Traffic used to be like before the A46 but every day. Green Lane traffic is difficult now.

Officer Recommendation No change

Kings Hill

Representor number **REP-1010**

Representor : **Mr Robert Fryer**

Company: **Finham Residents Association**

Representation number: **1751** Representation in regard to : **6.28**

Verbatim Submission

This representation format proved to be very difficult to use and many people were put off from using it.

A representative from the West Midlands Planning Aid Service said that this was not the recommended way of collecting views from the public.

The on line use of this form also caused a lot of problems as the system didn't work as wished.

Officer Recommendation No change

Representation number: **2096** Representation in regard to : **6.28**

Verbatim Submission

We were not made aware of Coventry City's WM approved intention to build up to 'overspill' 7,000 dwellings on its border with WDC land until we called a Residents Association Meeting to find out WDC progress to allocate WDC's 10,800 new residential unit allocation on 23 March 2009. This resulted in us being disenfranchised in that all applications to contribute to the RSS had to be registered by 8 December 2008 and in turn we were not allowed to speak at the Public Examination in the Molineaux Stadium 4 June 2009, but we could attend. Coventry City Council only passed their proposed Core Strategy 17 March 2009 so there was no way we could have registered earlier. If we hadn't have set up our own meeting 23.03.09, we would not have know even this.

Officer Recommendation No change

Kings Hill

Representor number **REP-1012**

Representor : **Mr Tim Metford**

Representation number: **1757** Representation in regard to : **6.28**

Verbatim Submission

National Policy

The Coventry Green Belt Review 2007 is not consistent with national policy. According to the Planning Policy guidance 2 (1995), sections 1.5 and 1.6, green belt land is important for many reasons and this document clearly outlines this:

"Purposes of including land in Green Belts

1.5 There are five purposes of including land in Green Belts:

to check the unrestricted sprawl of large built-up areas;

to prevent neighbouring towns from merging into one another;

to assist in safeguarding the countryside from encroachment;

to preserve the setting and special character of historic towns; and

to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The use of land in Green Belts 1.6 Once Green Belts have been defined, the use of land in them has a positive role to play in fulfilling the following objectives:

to provide opportunities for access to the open countryside for the urban population;

to provide opportunities for outdoor sport and outdoor recreation near urban areas;

to retain attractive landscapes, and enhance landscapes, near to where people live;

to improve damaged and derelict land around towns;

to secure nature conservation interest; and to retain land in agricultural, forestry and related uses. "

Any development of the land to the south side of Coventry will drastically reduce the gap between Coventry and Kenilworth (a notable historic town), adding to urban sprawl. The area of proposed development, the King's Hill area also contains notable historic sites (ancient medieval village), areas of ancient woodland (Wainbody wood), a protected hedgerow and a "Special Landscape Area". The 2007 Green Belt review indicates that development of the Green belt should only occur if it resulted in only modest visual impact - this is defined as 1. Not giving appearance of urban sprawl, 2. Not reducing important gaps between urban area and 3. Not encroaching on open countryside. It is obvious that the proposed development does not meet any of these three criteria. The proposed building of any houses on the King's Hill area to the South of Coventry would fail to satisfy all of the above three points and would be contrary to the prescriptions of the PPG2.

The Gap between Coventry and Kenilworth would be reduced to less than half a mile (see point 2 above)

Officer Recommendation

No change

Representation number: **1758** Representation in regard to : **6.28**

Verbatim Submission

Any building on the current Green belt would encroach on the open countryside (contrary to guidelines set out in the PPG 2 document).

Green belt release would damage areas of significant nature conservation area, for example Wainbody wood - even if it is not built on, it would suffer more vandalism, fly tipping and malicious damage.

Although the woodland is just one protected area it is a vital part of the local ecosystem and has a symbiotic relationship with the surrounding fields and ponds

Flood plain: The Coventry Green Belt Review 2007, section 3.5, point 6 proposes that Green belt land would only be released if "Designated land is not in a defined flood plain". Although many official documents do not refer to flood

plains of small flows, the King's Hill area suffers from very poor drainage and is in the flood plain of Finham Brook Visual Impact: The Coventry GB Review of 2007, section 3.5, point 2 proposes that the green belt land would only be

released if "release of significant green belt land would not significantly harm or detract from views of the city centre or of nearby historic towns {PPG2, purpose 4}". Although the city centre does not view this area directly, there would be significant visual impact from other areas.

Any development of this area would be highly visual and would not be discrete or subtle on the landscape.

Officer Recommendation

No change

Kings Hill

Representor number **REP-1012**

Representor : **Mr Tim Metford**

Representation number: **1759** Representation in regard to : **6.28**

Verbatim Submission

Any building on the current Green belt would encroach on the open countryside (contrary to guidelines set out in the PPG 2 document). Green belt release would damage areas of significant nature conservation area, for example Wainbody wood - even if it is not built on, it would suffer more vandalism, fly tipping and malicious damage.

Although the woodland is just one protected area it is a vital part of the local ecosystem and has a symbiotic relationship with the surrounding fields and ponds Flood plain: The Coventry Green Belt Review 2007, section 3.5, point 6 proposes that Green belt land would only be released if "Designated land is not in a defined flood plain". Although many official documents do not refer to flood plains of small flows, the King's Hill area suffers from very poor drainage and is in the flood plain of Finham Brook Visual Impact: The Coventry GBreview of 2007, section 3.5, point 2 proposes that the green belt land would only be released if "release of significant green belt land would not significantly harm or detract from views of the city centre or of nearby historic towns (PPG2, purpose 4)". Although the city centre does not view this area directly, there would be significant visual impact from other areas.

Any development of this area would be highly visual and would not be discrete or subtle on the landscape.

Officer Recommendation No change

Representation number: **1761** Representation in regard to : **6.28**

Verbatim Submission

Green Belt Impact of Development:

According to the Coventry Green Belt Review, section 3.5, point 1: "Areas of land for release from Green Belt designation will only be recommended if built development on them would result in only modest visual impact on the open character of the Green Belt in the surrounding area. Modest visual impact is defined here as not giving the appearance of urban sprawl, reducing important gaps between urban areas and encroachment of the open countryside, thereby addressing purposes 1,2 and 3 of Green Belt in PPG2."

It is quite clear that any development of the King's Hill area, to the south of Coventry is in conflict with this statement because the undeveloped, green space between Coventry and Kenilworth would be reduced to less than half a mile. The current countryside in this area contains several sites of note and includes a "Special Landscape Area"

Officer Recommendation No change

Representation number: **1762** Representation in regard to : **6.28**

Verbatim Submission

Character and Cohesion of the Green Belt The Coventry Green Belt Review, 2007, section 3.5, points 3 and 4 states that: "In green wedge areas of Green Belt the release of land for built development will only be recommended if the linear cohesion and openness of that green wedge is not significantly damaged." And "The addition of designated Green Belt land (including in green wedges) will be recommended only if it would significantly enhance the purposes, character or cohesion of the Green Belt.11

Any development (particularly a sizable one) would greatly affect the area of Green Belt. The wedge of green belt bounded by the A45, Green Lane, Kenilworth Road (and the Coventry railway line) and Stoneleigh would be lost and would result in a severance of the green belt around the south side of Coventry.

Officer Recommendation No change

Kings Hill

Representor number **REP-1012**

Representor : **Mr Tim Metford**

Representation number: **1763** Representation in regard to : **6.28**

Verbatim Submission

Wildlife, Nature Conservation and Historical Sites Green Belt Review 2007, section 3.5, point 5 states that "The release of designated Green Belt land would not damage areas of significant nature conservation value (Le. Site of Importance for Nature Conservation [SINC] or higher)."

The area of King's Hill contains Wainbody Wood - a protected ancient woodland, a historic, protected hedgerow, several ponds. This whole area is a habitat for many different species of animals including badgers, newts, bats, owls and many others. Even if Wainbody wood was not built on, it would suffer more vandalism, fly tipping and malicious damage. Although the woodland is just one protected area it is a vital part of the local ecosystem and has a symbiotic relationship with the surrounding fields and ponds. The field provide food sources for animals that inhabit the woodland etc.

Also in the King's Hill area, there is a registered ancient medieval monument - that of an abandoned medieval village. Although this is not so much a tourist attraction, it is important archaeologically to the area.

The King's Hill area also has some old mine shafts, these, although unused for some time could affect the geological integrity of the area.

Officer Recommendation No change

Representation number: **1764** Representation in regard to : **6.28**

Verbatim Submission

Water supply, Flooding and Drainage

Although there is not a significant river that passes through the King's Hill area, the area contains the Finham Brook.

The fields of the King's Hill area contain very poor drainage and there is a significant level of run-off onto Green Lane.

On occasions of more significant rainfall, the lower end of Green Lane in particular can become flooded. The fields do not have good natural drainage so natural run-off occurs onto the side of Green Lane.

Development of man-made structures on this site would only add to drainage problems

At the top of Green Lane/Gretna Road, there is a bore hole for the local water supply. Contamination from pesticides is already a problem. Any proposed development would not only pose additional contamination risks but would affect the natural water table.

Officer Recommendation No change

Kings Hill

Representor number **REP-1012**

Representor : **Mr Tim Metford**

Representation number: **1765** Representation in regard to : **6.28**

Verbatim Submission

Transport network and Infrastructure:

According to the Coventry Green Belt Review 2007, section 3.5, point 7: "Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking / cycling routes and social/community / leisure facilities) are easily accessed."

The road network around the proposed King's Hill development (implied in Core Strategy, proposed submission paragraph 6.28) are currently not satisfactory to support any additional development (residential or otherwise).

Additional development would cause further gridlock along local roads (namely the A45, St Martins Road, Kenilworth Road and Stoneleigh Road). This would lead to great pressure for a southern relief road - this would cause even greater delays in any time plan due to the processes of planning permission, hold ups, controversy in the community and the landscape and environmental damage.

Any widening of Kenilworth Road between the junction with the A45 and the Gibbet Hill junction would encounter significant resistance and would damage one of Coventry's premier approaches.

The road infrastructure required for King's Hill is not deliverable in a timely, economic and sustainable manner and such developments are not in accordance with the correct purposes of the green belt contained within purposes 1,2,3 of the PPG 2 i.e. "capable of being developed in a sustainable way and readily integrated into with the existing built - up area

In terms of infrastructure other than the road network, there are insufficient facilities to accommodate an additional population in the area to the south of the Green Lane area of Coventry. Namely schools, health care provision, community facilities etc. Section 3.5, point 7 of the Coventry Green Belt review 2007 states "Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking / cycling routes and social/community / leisure facilities) are easily accessed."

The protected hedgerow should remain uninterrupted and therefore full provision of facilities would have to be made alongside any development. It would be catastrophic to any new development to be established without these facilities.

Officer Recommendation No change

Representation number: **1766** Representation in regard to : **6.28**

Verbatim Submission

Lack of Information for Justification:

The core strategy, particularly paragraph 6.28 is not justified because it is not the most appropriate strategy and there are other reasonable alternatives.

The core strategy is also very vague and states that "land may be identified on the edge of Coventry... if enough land cannot be found within the city's boundaries" - At no part does it specify the number of dwellings (even a range) or any other development (e.g. industrial/community developments). Paragraph 6.28 is not a reasonable strategy as long as brown field land remains within the city boundary

Therefore a ruling must be put in place to ensure that development is carried out in a sequential manner such that Green belt is only developed after all available brown field locations are dealt with.

Although the size of a development cannot be stringently determined at this stage this lack of information does not inform people and is cause for concern.

Officer Recommendation No change

Representation number: **1767** Representation in regard to : **6.28**

Verbatim Submission

6.28 of the Core Strategy is not effective because it is not deliverable - it fails to set out how the "vision, objectives and strategy for the area will be delivered". The document is vague and uninformative and says that land "may be identified on the edge of Coventry, in the administrative areas of WDC and Nuneaton and Bedworth Borough councils - it is not able to be monitored/determined because it is not a set-out policy.

Officer Recommendation No change

Kings Hill

Representor number **REP-1012**

Representor : **Mr Tim Metford**

Representation number: **1769** Representation in regard to : **6.28**

Verbatim Submission

The core strategy proposed submission document is:

NOTinformative

NOTdeliverable

NOTflexible

NOTable to be monitored

... this is because:

The document is incomplete and vague. A significant proportion of the 33500 dwellings that Coventry is "required" to build are deemed to not "fit" within the current city boundary and there is no detail within the CC Core Strategy

proposed submission. One "reason" given by CC planning office is that any development outside ofthe boundary is the legal responsibility of WOCand CCC has not legal right to publish or propose what may/may not happen. This

lack of information is misleading and certainly not informing the people.

Only 26510 dwellings have currently been identified and the remaining numbers are not assigned. This does not inform people.

By law the planning process is designed to be transparent. This process has not achieved this at all. People have only been made aware ofthe documents due to attending a local residents meeting. The location of the information on the internet is poorly laid out and is difficult to find.

There is no explanation of the reason/insistence on the development of the North/South corridor around Coventry when transport links to the Eastand West are equally strong.

Officer Recommendation No change

Representation number: **1770** Representation in regard to : **6.28**

Verbatim Submission

LEGAL COMPLIANCE:

Statement of Community Involvement (SCI) from Coventry City Council, Section 1.7 states:

"our vision is a city where... all stakeholders, elected members and officers have a high level of awareness of planning policy and processes and built environment quality issues"

Residents have not been made aware of many of the issuesof the proposed core strategy. Evento the extent where many people have only been made aware of the opportunity to put forward a representation (this document) very late in the process and due to other members ofthe community. There has been no notification from the city council members or planning department and the information regarding the potential development of the area to the south of Coventry (namely the King's Hill area) has not been forthcoming even when requested.

Section 4.3 "it is essential that all the main interested groups and key stake holders are aware and respect a common understanding of the approach adopted"

Section 1.10 "A key requirement of sustainable development is effective involvement of local people, groups and businesses in the planning of the community"

Coventry's Statement of Community Involvement, states that "to help make the planning system transparent, by making plans, policies, development proposals and planning decisions available in a form which is easily understood and accessible to all."

This most certainly has not occurred. The documentation is not readily available (even difficult to find on the local government planning web pages) and there has been no effort to communicate its existence to the local people.

Due to the lack of information there has been no proper consultation.

The core strategy is incomplete due to its lack of information, in particular, any indication of where the dwellings

that will not fit inside the city boundary are to be located. Although the availability of this information may be limited due to it being allocated to other districts/boroughs on the Coventry boundary, there is no attempt to inform the reader in any way.

Officer Recommendation No change

Kings Hill

Representor number **REP-1012**

Representor : **Mr Tim Metford**

Representation number: **1771** Representation in regard to : **6.64**

Verbatim Submission

The concept of providing adequate employment land is based on out-of-date studies of future needs. The information has not been updated to take account of the current economic climate affecting local and national issues. The nature of employment demographics has also changed significantly, with much heavy industry leaving the area (notably the car industry) resulting in the loss of employment.

One of the proposed areas for increased employment in the core strategy is the increase in number of jobs at the two Universities within Coventry. However, Warwick University has already warned it's current employees of future difficulties. In a letter to staff in April 2009, the Vice Chancellor wrote " ...it is clear that over the next couple of years all universities will face further financial challenges. There will inevitably be reduced returns from our commercial activities and we must all face the possibility that future cuts in government funding will lead to a reduction in University funding..." The letter also noted the university's " ...financial position and the measures we were taking to prevent a growing deficit." And the "cost reductions in commercial operations, slowing the rate of staff expenditure with a new vacancy-scrutiny process".

It is necessary that a new appraisal of the future growth of Coventry is made before developments are made.

Officer Recommendation No change

Representation number: **1772** Representation in regard to : **5.10**

Verbatim Submission

Along with the previous point (regarding section 6.64) this paragraph of the proposed submission document states that "50% of all new jobs are expected to come from office development in the City Centre. A further 25% of employment provision will result from the growth of the University of Warwick and Coventry University, and the University Hospital, thus providing a focus on health and education. The remaining 25% will be provided for in other sectors, including traditional manufacturing uses. However the main thrust of growth is expected to be through offices and research and development."

As seen in the previous point, the University of Warwick (although ranked #7 in the UK based on the 2008 RAE) is facing tough times and expansion will be restricted due to financial situations. Therefore the employment figures of this statement are out of date.

Officer Recommendation No change

Representation number: **1773** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

Removal and additions of Green Belt designations

The map of this appendix is confusing since the shades of green on the map do not match the shades of green in the key. This gives the impression, without a great deal of study that the proposed land removal from the Green Belt (safeguarded land) could be confused with proposed additions.

Officer Recommendation Minor change. Amend colour scheme

Kings Hill

Representor number **REP-1012**

Representor : **Mr Tim Metford**

Representation number: **1774** Representation in regard to : **7.31**

Verbatim Submission

Within the proposals, school playing fields (e.g. Finham Park and Finham Primary school) will be removed from Green belt status. This is not only for areas of the field where rebuilding or expansion of the school is felt to be needed, but for the entire playing field. This could lead to the playing fields being in danger of being lost, as has been the case in many areas of the country for the past 20 years, where similar school fields have been sold for development. This is no longer consistent with government policy. It is also unclear what is meant by "safeguarded land"; in what "very special circumstances" could this land be used for future building development. The statement is vague and open to wide differences in interpretation. If this is not sound, then it leads to land not being adequately protected.

Officer Recommendation

Minor change. Insert new sentences at end of paragraph to read: "School playing fields can also contribute to this provision. Policy EQ4 provides a basis for consideration of any proposals involving loss of green space. Based on the quantitative standards for sports grounds, the main deficiency is in the North West Neighbourhood Area. There is a good distribution of sports pitches across the city and the level of community use needs to be established to enable accurate supply and demand calculations to be established." Delete from "Based on the quantitative" box from table.

Representation number: **1775** Representation in regard to : **3.12**

Verbatim Submission

The proposed submission documents states that development outside the city boundary may be necessary, on the edge of Coventry but on land covered by additional districts. No other information is given about this apart from the fact that these other local authorities are also publishing their own core strategies. Unfortunately, none of these documents where the additional dwellings from Coventry will go outside the city boundary and Coventry itself fails to inform of this either, leaving residents of the boundary areas of Coventry completing uninformed.

Officer Recommendation

No change

Representation number: **1776** Representation in regard to : **4.4**

Verbatim Submission

4.4, point 7:
Development to ensure.....
- The need for travel will have reduced as developments for learning and leisure, health services and shops and employment will have been positioned in convenient places.
- The quality of Coventry's local public transport services will have further improved and people will be more likely to travel in ways that are less damaging to the environment.
Any development of the King's Hill area, to the south of Coventry would lead to an isolated community even if provision of schools and health care were made within the development. The road links are such that leading traffic onto local roads would result in significant congestion and the protected hedgerow along Green Lane should not be interrupted. Even with a proposed park and ride (which according to the Green Belt review and PPG2) should be avoided where possible on green belt land), residents of any new development would almost certainly prefer to rely on their own private cars rather than public transport due to convenience and cost.

Officer Recommendation

No change

Kings Hill

Representor number **REP-1021**

Representor : **Mr Santokh Khara**

Representation number: **1805** Representation in regard to : **6.28**

Verbatim Submission

serpant Character and Cohesion of the Green Belt The Covnetry Green Belt Review, 2007, section 3.5, points 3 and 4 states that: „In green wedge areas of Green Belt the release of land for built development will only be recommended if the linear cohesion and openness of that green wedge is not significantly damaged.„ And „The addition of designated Green Belt land (including in green wedges) will be recommended only if it would significantly enhance the purposes, character or cohesion of the Green Belt.„ Any development (particularly a sizable one) would greatly affect the area of Green Belt. The wedge of green belt bounded by the A45, Green Lane, Kenilworth Road (and the Coventry railway line) and Stoneleigh would be lost and would result in a severance of the green belt around the south side of Coventry

Officer Recommendation No change

Representation number: **1806** Representation in regard to : **6.28**

Verbatim Submission

Wildlife, Nature Conservation and Historical Sites Green Belt Review 2007, section 3.5, point 5 states that „The release of designated Green Belt land would not damage areas of significant nature conservation value (i.e. Site of Importance for Nature Conservation [SINC] or higher).„ The area of King’s Hill contains Wainbody Wood „ a protected ancient woodland, a historic, protected hedgerow, several ponds. This whole area is a habitat for many different species of animals including badgers, newts, bats, owls and many others. Even if Wainbody wood was not built on, it would suffer more vandalism, fly tipping and malicious damage. Although the woodland is just one protected area it is a vital part of the local ecosystem and has a symbiotic relationship with the surrounding fields and ponds. The field provide food sources for animals that inhabit the woodland etc. Also in the King’s Hill area, there is a registered ancient medieval monument „ that of an abandoned medieval village. Although this is not so much a tourist attraction, it is important archaeologically to the area. The King’s Hill area also has some old mine shafts, these, although unused for some time could affect the geological integrity of the area

Officer Recommendation No change

Representation number: **1807** Representation in regard to : **6.28**

Verbatim Submission

Water supply, Flooding and Drainage Although there is not a significant river that passes through the King’s Hill area, the area contains the Finham Brook. The fields of the King’s Hill area contain very poor drainage and there is a signicant level of run-off onto Green Lane. On occasions of more significant rainfall, the lower end of Green Lane in particular can become flooded. The fields do not have good natural drainage so natural run-off occurs onto the side of Green Lane. Development of man-made structures on this site would only add to drainage problems At the top of Green Lane/Gretna Road, there is a bore hole for the local water supply. Contamination from pesticides is already a problem. Any proposed development would not only pose additional contamination risks but would affect the natural water table.

Officer Recommendation No change

Kings Hill

Representor number **REP-1021**

Representor : **Mr Santokh Khera**

Representation number: **1808** Representation in regard to : **6.28**

Verbatim Submission

Transport network and Infrastructure According to the Coventry Green Belt Review 2007, section 3.5, point 7: Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking / cycling routes and social / community / leisure facilities) are easily accessed. The road network around the proposed King's Hill development (implied in Core Strategy, proposed submission paragraph 6.28) are currently not satisfactory to support any additional development (residential or otherwise). Additional development would cause further gridlock along local roads (namely the A45, St Martins Road, Kenilworth Road and Stoneleigh Road). This would lead to great pressure for a southern relief road this would cause even greater delays in any time plan due to the processes of planning permission, hold ups, controversy in the community and the landscape and environmental damage. Any widening of Kenilworth Road between the junction with the A45 and the Gibbet Hill junction would encounter significant resistant and would damage one of Coventry's premier approaches. The road infrastructure required for King's Hill is not deliverable in a timely, economic and sustainable manner and such developments are not in accordance with the correct purposes of the green belt contained within purposes 1,2,3 of the PPG 2 i.e. capable of being developed in a sustainable way and readily integrated into with the existing built up area In terms of infrastructure other than the road network, there are insufficient facilities to accommodate an additional population in the area to the south of the Green Lane area of Coventry. Namely schools, health care provision, community facilities etc. Section 3.5, point 7 of the Coventry Green Belt review 2007 states 'Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking / cycling routes and social / community / leisure facilities) are easily accessed.' The protected hedgerow should remain uninterrupted and therefore full provision of facilities would have to be made alongside any development. It would be catastrophic to any new development to be established without these facilities.

Officer Recommendation No change

Representation number: **1809** Representation in regard to : **6.28**

Verbatim Submission

Lack of Information for Justification: The core strategy, particularly paragraph 6.28 is not justified because it is not the most appropriate strategy and there are other reasonable alternatives. The core strategy is also very vague and states that 'land may be identified on the edge of Coventry... if enough land cannot be found within the city's boundaries'. At no part does it specify the number of dwellings (even a range) or any other development (e.g. industrial/community developments). Paragraph 6.28 is not a reasonable strategy as long as brown field land remains within the city boundary Therefore a ruling must be put in place to ensure that development is carried out in a sequential manner such that Green belt is only developed after all available brown field locations are dealt with. Although the size of a development cannot be stringently determined at this stage this lack of information does not inform people and is cause for concern.

Officer Recommendation No change

Kings Hill

Representor number **REP-1021**

Representor : **Mr Santokh Khara**

Representation number: **1810** Representation in regard to : **6.28**

Verbatim Submission

The core strategy proposed submission document is: NOT informative NOT deliverable NOT flexible NOT able to be monitored ... this is because: The document is incomplete and vague. A significant proportion of the 33500 dwellings that Coventry is 'required' to build are deemed to not 'fit' within the current city boundary and there is no detail within the CC Core Strategy proposed submission. One 'reason' given by CC planning office is that any development outside of the boundary is the legal responsibility of WDC and CCC has not legal right to publish or propose what may/may not happen. This lack of information is misleading and certainly not informing the people. Only 26510 dwellings have currently been identified and the remaining numbers are not assigned. This does not inform people. By law the planning process is designed to be transparent. This process has not achieved this at all. People have only been made aware of the documents due to attending a local residents meeting. The location of the information on the internet is poorly laid out and is difficult to find. There is no explanation of the reason/insistence on the development of the North/South corridor around Coventry when transport links to the East and West are equally strong.

Officer Recommendation No change

Representation number: **1811** Representation in regard to : **6.28**

Verbatim Submission

LEGAL COMPLIANCE: Statement of Community Involvement (SCI) from Coventry City Council, Section 1.7 states: 'our vision is a city where... all stakeholders, elected members and officers have a high level of awareness of planning policy and processes and built environment quality issues' Residents have not been made aware of many of the issues of the proposed core strategy. Even to the extent where many people have only been made aware of the opportunity to put forward a representation (this document) very late in the process and due to other members of the community. There has been no notification from the city council members or planning department and the information regarding the potential development of the area to the south of Coventry (namely the King's Hill area) has not been forthcoming even when requested. Section 4.3 'it is essential that all the main interested groups and key stake holders are aware and respect a common understanding of the approach adopted' Section 1.10 'A key requirement of sustainable development is effective involvement of local people, groups and businesses in the planning of the community' Coventry's Statement of Community Involvement, states that 'to help make the planning system transparent, by making plans, policies, development proposals and planning decisions available in a form which is easily understood and accessible to all.' This most certainly has not occurred. The documentation is not readily available (even difficult to find on the local government planning web pages) and there has been no effort to communicate its existence to the local people. Due to the lack of information there has been no proper consultation. The core strategy is incomplete due to its lack of information, in particular, any indication of where the dwellings that will not fit inside the city boundary are to be located. Although the availability of this information may be limited due to it being allocated to other districts/boroughs on the Coventry boundary, there is no attempt to inform the reader in any way.

Officer Recommendation No change

Kings Hill

Representor number **REP-1021**

Representor : **Mr Santokh Kherra**

Representation number: **1812** Representation in regard to : **6.28**

Verbatim Submission

Location and scale of housing development The document presumes that the land outwith the Coventry city boundary will be used for development without any consultation of the Coventry residents who live on this boundary. In stark contrast, the residents of Warwick District council have been consulted on this, having been given the chance to vote on the preferred location of developments within their district. This is an unfair situation for Coventry residents. The location of land being considered outside the city boundary, means that Coventry residents, who will be affected by any decision, fall between the two districts for consultation. As a result, there has been an illegal and unfair lack of any consultation and dissemination of information to these residents. Since Coventry City Council is looking at the release of green belt land in Warwickshire, it is suspect whether this is sound or legal as it is not within the city boundary. There are many objections to any development of the King's Hill site and although the land is not in Warwickshire, and therefore not in the Coventry core strategy, a full and public consultation is needed with the residents of Coventry. Reasons and objections to the development of the King's Hill area: Destruction of historical sites Destruction of special landscape area Damage to flora and fauna due to devastation of natural habitat (including badgers and newts) Lack of transport infrastructure Lack of other infrastructure Land is prone to flooding Damage to the distinctiveness of the identities of Coventry, Kenilworth, Bubbenhall, Baginton and Stoneleigh settlements. Destruction of valuable farmland particularly in a time where climate change has made it more important to grow food locally and provide food security for the nation.

Officer Recommendation No change

Representation number: **1813** Representation in regard to : **6.64**

Verbatim Submission

The concept of providing adequate employment land is based on out-of-date studies of future needs. The information has not been updated to take account of the current economic climate affecting local and national issues. The nature of employment demographics has also changed significantly, with much heavy industry leaving the area (notably the car industry) resulting in the loss of employment. One of the proposed areas for increased employment in the core strategy is the increase in number of jobs at the two Universities within Coventry. However, Warwick University has already warned it's current employees of future difficulties. In a letter to staff in April 2009, the Vice Chancellor wrote '...it is clear that over the next couple of years all universities will face further financial challenges. There will inevitably be reduced returns from our commercial activities and we must all face the possibility that future cuts in government funding will lead to a reduction in University funding...' The letter also noted the university's financial position and the measures we were taking to prevent a growing deficit.' And the 'cost reductions in commercial operations, slowing the rate of staff expenditure with a new vacancy-scrutiny process'. It is necessary that a new appraisal of the future growth of Coventry is made before developments are made.

Officer Recommendation No change

Representation number: **1814** Representation in regard to : **5.10**

Verbatim Submission

This paragraph of the proposed submission document states that 50% of all new jobs are expected to come from office development in the City Centre. A further 25% of employment provision will result from the growth of the University of Warwick and Coventry University, and the University Hospital, thus providing a focus on health and education. The remaining 25% will be provided for in other sectors, including traditional manufacturing uses. However the main thrust of growth is expected to be through offices and research and development. As seen in the previous point, the University of Warwick (although ranked #7 in the UK based on the 2008 RAE) is facing tough times and expansion will be restricted due to financial situations. Therefore the employment figures of this statement are out of date.

Officer Recommendation No change

Kings Hill

Representor number **REP-1021**

Representor : **Mr Santokh Khara**

Representation number: **1815** Representation in regard to : **Sustainability Appraisal**

Verbatim Submission

Removal and additions of Green Belt designations The map of this appendix is confusing since the shades of green on the map do not match the shades of green in the key. This gives the impression, without a great deal of study that the proposed land removal from the Green Belt (safeguarded land) could be confused with proposed additions.

Officer Recommendation No change

Representation number: **1816** Representation in regard to : **7.31**

Verbatim Submission

School Sites Within the proposals, school playing fields (e.g. Finham Park and Finham Primary school) will be removed from Green belt status. This is not only for areas of the field where rebuilding or expansion of the school is felt to be needed, but for the entire playing field. This could lead to the playing fields being in danger of being lost, as has been the case in many areas of the country for the past 20 years, where similar school fields have been sold for development. This is no longer consistent with government policy. It is also unclear what is meant by 'safeguarded land'; in what 'very special circumstances' could this land be used for future building development. The statement is vague and open to wide differences in interpretation. If this is not sound, then it leads to land not being adequately protected.

Officer Recommendation No change

Representation number: **1817** Representation in regard to : **3.12**

Verbatim Submission

The proposed submission documents states that development outside the city boundary may be necessary, on the edge of Coventry but on land covered by additional districts. No other information is given about this apart from the fact that these other local authorities are also publishing their own core strategies. Unfortunately, none of these document where the additional dwellings from Coventry will go outside the city boundary and Coventry itself fails to inform of this either, leaving residents of the boundary areas of Coventry completing uninformed.

Officer Recommendation No change

Representation number: **1818** Representation in regard to : **4.4**

Verbatim Submission

4.4, point 7: Development to ensure..... ' The need for travel will have reduced as developments for learning and leisure, health services and shops and employment will have been positioned in convenient places. 'The quality of Coventry's local public transport services will have further improved and people will be more likely to travel in ways that are less damaging to the environment. Any development of the King's Hill area, to the south of Coventry would lead to an isolated community even if provision of schools and health care were made within the development. The road links are such that leading traffic onto local roads would result in significant congestion and the protected hedgerow along Green Lane should not be interrupted. Even with a proposed park and ride (which according to the Green Belt review and PPG2) should be avoided where possible on green belt land), residents of any new development would almost certainly prefer to rely on their own private cars rather than public transport due to convenience and cost.

Officer Recommendation No change

Representation number: **1945** Representation in regard to : **6.28**

Verbatim Submission

The Core Strategy is not effective because it is not deliverable. It fails to set out how the vision, objectives and strategy for the area will be delivered. The document is vague and uninformative and says that the land "may be identified on the edge of Coventry, in the administrative areas of WDC and Nuneaton and Bedworth Borough Councils. It is not able to be monitored / determined because it is not set out policy.

It is essential that CCC and WDC consult with each other the WM RSS planners and fully publish a Core Strategy which sets out how Brownfield sites may be developed in the Coventry Boundary and Green Belt. Take would be considered and follow a strict sequential rule.

Officer Recommendation No change

Kings Hill

Representor number **REP-1022**

Representor : **Lindsay Green**

Representation number: **1819** Representation in regard to : **6.28**

Verbatim Submission

This is presuming land outwith the boundaries of Coventry City will be used, with no consultation with the Coventry residents living on this boundary. In stark contrast, the residents of Warwick District have been consulted on this, having been given a chance to vote on the preferred location within Warwickshire. This is seriously unfair to the Coventry residents. The location of the land being looked at means that the Coventry residents, despite being those most effected by any decision, fall between the 2 districts for consultation. As a result there is an illegal and unfair lack of consultation with these residents. Also as Coventry City Council are looking at the release of Warwickshire land I suspect this neither sound nor legal as this land is not within Coventry's boundaries. There are a huge number of objections which could be made against the proposals to build on this land, including: destruction of medieval and historical sites in King's Hill; destruction of medieval hedgerow; damage to the flora and fauna, which include badger setts and newts; the land is very prone to flooding; poor infrastructure and access; the presence of Finham Sewage works; damage to the distinctiveness of identities of the settlements of Coventry, Kenilworth, Bubbenhall, and Stoneleigh; the destruction of valuable farm land in a climate where it is becoming more and more important environmentally for countries to produce a greater percentage of their own food. These concerns, however, can not be fully addressed as yet as Coventry is talking about Warwick land and not its own, and this Core Strategy is about Coventry land.

Officer Recommendation No change

Representation number: **1820** Representation in regard to : **6.64**

Verbatim Submission

This is based on out-of-date studies of future needs. It has not been updated to take into account the current economic situation effecting the area. In paragraph 6:64 a large number of new jobs are expected to be created by the 2 universities, whereas, as an example, staff at Warwick University are being warned of future difficulties. Quote from Warwick's Vice-Chancellor in his letter to staff 2nd April 2009, "it is clear that over the next couple of years all universities will face further financial challenges. There will inevitably be reduced returns from our commercial activities and we must all face the possibility that future cuts in government funding will lead to a reduction in University funding from HEFCE" Therefore a new appraisal is needed here before any decision is made on future growth of the City of Coventry.

Officer Recommendation No change

Representation number: **1821** Representation in regard to : **Sustainability Appraisal**

Verbatim Submission

In Green Belt Land Designations, removals and additions: The colours of green used in this diagram/map are confusing in that they do not tally with those in the attached key. This gives the impression without a great deal of study that proposed land removal from the Green Belt (safeguarded land) could be confused with proposed additions.

Officer Recommendation No change

Representation number: **1822** Representation in regard to : **7.31**

Verbatim Submission

Within the proposals school playing fields, examples being those of Finham Park and Finham Primary, be removed from Green Belt status. This is not only for the areas of the field where rebuilding or expansion of the school is felt to be needed but for the entire playing field. This could lead to the playing fields being in danger of being lost, as has been the case in many areas of the country for the last 20 years or so, where similar fields have been sold for building. This is no longer consistent with government policy. It is also unclear what is meant by 'safeguarded land'; in what 'very special circumstances' could this land be used for building in future. This statement is open to huge differences in interpretation and is not sound as it leads to the land being not protected adequately.

Officer Recommendation No change

Kings Hill

Representor number **REP-1024**

Representor : **Mr Barry Bateman**

Representation number: **1823** Representation in regard to : **6.28**

Verbatim Submission

Green Belt must be upheld with no link (Coventry to Kenilworth).

Proposed area very wet. Do we need houses in this area, with no infrastructure in place, roads, schools, doctors etc., Extra volume of people will not use Coventry City to bring more revenue to the town

Officer Recommendation No change

Representor number **REP-1032**

Representor : **Mr & Mrs Peter & Sarah Watson**

Representation number: **1834** Representation in regard to : **6.28**

Verbatim Submission

We feel the DPD is not legally compliant due to the lack of notification or consultation with the residents of Finham regarding the West Midlands Regional Spatial Strategy proposals. The first the residents knew about the proposals was at a meeting of the residents association held on 23rd March 2009 which was too late to make representations as the deadline of 8th December 2008 had passed.

Officer Recommendation No change

Representation number: **1841** Representation in regard to : **6.28**

Verbatim Submission

We feel the DPD is unsound because:

The present infrastructure in Finham is totally inadequate to accommodate an increase of up to 7,000 plus homes. Green Lane is a narrow and busy road with residents cars parked at frequent intervals making it difficult for traffic to pass and even more difficult for the local bus services and the frequent school coaches. The road becomes very congested at school times and could not cope with any increase in traffic resulting from the proposed development. Although Finham Park School is being redeveloped apparently there will be no provision for increased capacity so the school would be inadequate to cope with any additional intake. It will be regrettable if the Green Belt area is lost as in such a developed area as the West Midlands, it is important to preserve the Green Belt for people, wildlife and the environment in general. The fact that Green Lane has a medieval hedgerow is also of great significance.

Kings Hill Lane and surrounding fields are prone to standing water and flooding, and any increase in housing with the resultant tarmac/paving of surfaces can only exacerbate the problem.

Officer Recommendation No change

Representor number **REP-1047**

Representor : **Mrs Cathryn Craven**

Representation number: **1879** Representation in regard to : **6.28**

Verbatim Submission

If the land along Kings Hill is used, no consultation has been made with residents.

Coventry City Council are also looking at this land and have not consulted residents

Officer Recommendation No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1889** Representation in regard to : **5.10**

Verbatim Submission

Employment and Additional Population

Along with the section 6.64, paragraph 5.10 of the proposed submission document states that "50% of all new jobs are expected to come from office development in the City Centre. A further 25% of employment provision will result from the growth of the University of Warwick and Coventry University, and the University Hospital, thus providing a focus on health and education. The remaining 25% will be provided for in other sectors, including traditional manufacturing uses. One of the proposed areas for increased employment in the core strategy is the increase in number of jobs at the two Universities within Coventry. However, Warwick University has already warned it's current employees of future difficulties. In a letter to staff in April 2009, the Vice Chancellor wrote "...it is clear that over the next couple of years all universities will face further financial challenges. There will inevitably be reduced returns from our commercial activities and we must all

face the possibility that future cuts in government funding will lead to a reduction in University funding ..." The letter also noted the university's "...financial position and the measures we were taking to prevent a growing deficit." And the "cost reductions in commercial operations, slowing the rate of staff expenditure with a new vacancy-scrutiny process". It is necessary that a new appraisal of the future growth of Coventry is made before developments are made.

Officer Recommendation No change

Representation number: **1890** Representation in regard to : **Sustainability Appraisal**

Verbatim Submission

Sustainability Appraisal Appendix 4

The map of this appendix is confusing since the shades of green on the map do not match the shades of green in the key. This gives the impression, without a great deal of study that the proposed land removal from the Green Belt (safeguarded land) could be confused with proposed additions. When the document is vague and difficult to understand, people rely on visual aids so it is

particularly important that the maps are clear.

Officer Recommendation Agreed, the Council will improve the clarity of this map. Minor change: amend colour scheme of map 4 of SA to improve clarity and understanding.

Representation number: **1891** Representation in regard to : **7.31**

Verbatim Submission

School Sites

Within the proposals, school playing fields (e.g. Finham Park and Finham Primary school) will be removed from Green belt status. This is not only for areas of the field where rebuilding or expansion of the school is felt to be needed, but for the entire playing field. This could lead to the playing fields being in danger of being lost, as has been the case in many areas of the country for the past 20 years, where similar school fields have been sold for development. This is no longer consistent with government policy. It is also unclear what is meant by "safeguarded land"; in what "very special circumstances" could this land be used for future building development. The statement is vague and open to wide differences in interpretation. If this is not sound, then it leads to land not being adequately protected. Current national and international concerns about obesity and general health of children (including allergies etc) indicates the importance of all the playing fields and outside space that children can have. It is essential that these areas are not sacrificed and compulsory purchase notices of this land should be banned.

Officer Recommendation No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1892** Representation in regard to : **3.12**

Verbatim Submission

The proposed submission documents states that development outside the city boundary may be necessary, on the edge of Coventry but on land covered by additional districts. No other information is given about this apart from the fact that these other local authorities are also publishing their own core strategies. Unfortunately, none of these document where the additional dwellings from

Coventry will go outside the city boundary and Coventry itself fails to inform of this either, leaving residents of the boundary areas of Coventry completing uninformed.

Officer Recommendation No change

Representation number: **1893** Representation in regard to : **4.4**

Verbatim Submission

4.4, point 7:

Development to ensure -

- The need for travel will have reduced as developments for learning and leisure, health services and shops and employment will have been positioned in convenient places.

- The quality of Coventry's local public transport services will have further improved and people will be more likely to travel in ways that are less damaging to the environment.

Any development of the King's Hill area, to the south of Coventry would lead to an isolated community even if provision of schools and health care were made within the development. The road links are such that leading traffic onto local roads would result in significant congestion and the protected hedgerow along Green Lane should not be interrupted. Even with a proposed park and ride (which according to the Green Belt review and PPG2) should be avoided where possible on green belt land), residents of any new development would almost certainly prefer to rely on their own private cars rather than public transport due to convenience and cost.

Officer Recommendation No change

Representation number: **1894** Representation in regard to : **6.28**

Verbatim Submission

Lack of Information for Justification:

The core strategy, particularly paragraph 6.28 is not justified because it is not the most appropriate strategy and there are other reasonable alternatives.

The core strategy is also very vague and states that "land may be identified on the edge of Coventry ... if enough land cannot be found within the city's boundaries" - At no part does it specify the number of dwellings (even a range) or any other development (e.g. industrial/community developments). Paragraph 6.28 is not a reasonable strategy as long as brown field land remains within the city boundary

Therefore a ruling must be put in place to ensure that development is carried out in a sequential manner such that Green belt is only developed after all available brown field locations are dealt with.

Although the size of a development cannot be stringently determined at this stage this lack of information does not inform people and is cause for concern. This concern is deepened even more when residents of the King's Hill area have had enquiries from developers regarding land ownership etc. In the Green Belt review 2007 and the PPG2, it is stated that green belt land should only be developed AFTER all other sites have been developed (i.e. brown field sites). This is very alarming and destroys any feeling of involvement local people have in this process. The consultation has been none existent and people have only become aware of issues when a knock on the door is from a major housing developer!

Officer Recommendation No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1896** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

The core strategy proposed submission document is:

NOT informative

NOT deliverable

NOT flexible

NOT able to be monitored ... this is because:

The document is incomplete and vague. A significant proportion of the 33500 dwellings that Coventry is "required" to build are deemed to not "fit" within the current city boundary and there is no detail within the CC Core Strategy proposed submission. One "reason" given by CC planning office is that any development outside of the boundary is the legal responsibility of WDC and CCC has not legal right to publish or propose what may/may not happen. This lack of information is misleading and certainly not informing the people. Only 26510 dwellings have currently been identified and the remaining numbers are not assigned. This does not inform people. By law the planning process is designed to be transparent. This process has not achieved this at all. People have only been made aware of the documents due to attending a local residents meeting. The location of the information on the internet is poorly laid out and is difficult to find.

There is no explanation of the reason/insistence on the development of the North/South corridor around Coventry when transport links to the East and West are equally strong.

Officer Recommendation No change

Representation number: **1897** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

LEGAL COMPLIANCE:

Statement of Community Involvement (SCI) from Coventry City Council, Section 1.7 states:

"our vision is a city where... all stakeholders, elected members and officers have a high level of awareness of planning policy and processes and built environment quality issues"

Residents have not been made aware of many of the issues of the proposed core strategy. Even to the extent where many people have only been made aware of the opportunity to put forward a representation (this document) very late in the process and due to other members of the community. There has been no notification from the city council members or planning department and the information regarding the potential development of the area to the south of Coventry (namely the King's Hill area) has not been forthcoming even when requested.

Section 4.3 "it is essential that all the main interested groups and key stake holders are aware and respect a common understanding of the approach adopted" Section 1.10 "A key requirement of sustainable development is effective involvement of local people, groups and businesses in the planning of the community" Coventry's Statement of Community Involvement, states that "to help make the planning system transparent, by making plans, policies, development proposals and planning decisions available in a form which is easily understood and accessible to all." This most certainly has not occurred. The documentation is not readily available (even difficult to find on the local government planning web pages) and there has been no effort to communicate its existence to the local people. Due to the lack of information there has been no proper consultation.

The core strategy is incomplete due to its lack of information, in particular, any indication of where the dwellings that will not fit inside the city boundary are to be located. Although the availability of this information may be limited due to it being allocated to other districts/boroughs on the Coventry boundary, there is no attempt to inform the reader in any way.

Officer Recommendation No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1898** Representation in regard to : **6.64**

Verbatim Submission

Adequate supply of employment land

The concept of providing adequate employment land is based on out-of-date studies of future needs. The information has not been updated to take account of the current economic climate affecting local and national issues. The nature of employment demographics has also changed significantly, with much heavy industry leaving the area (notably the car industry) resulting in the loss of employment.

One of the proposed areas for increased employment in the core strategy is the increase in number of jobs at the two Universities within Coventry. However, Warwick University has already warned it's current employees of future difficulties. In a letter to staff in April 2009, the Vice Chancellor wrote " ...it is clear that over the next couple of years all universities will face further financial challenges. There will inevitably be reduced returns from our commercial activities and we must all

face the possibility that future cuts in government funding will lead to a reduction in University funding..." The letter also noted the university's " ...financial position and the measures we were taking to prevent a growing deficit." And the "cost reductions in commercial operations, slowing the rate of staff expenditure with a new vacancy-scrutiny process". It is necessary that a new appraisal of the future growth of Coventry is made before developments are made.

Officer Recommendation No change

Representation number: **1900** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

6.28 of the Core Strategy is not effective because it is not deliverable - it fails to set out how the "vision, objectives and strategy for the area will be delivered". The document is vague and uninformative and says that land "may be identified on the edge of Coventry, in the administrative areas of WDC and Nuneaton and Bedworth Borough councils - it is not able to be monitored!

determined because it is not a set-out policy. it is not user friendly for the general public to find it available or digestible. The document is incomplete and vague. A significant proportion of the 33500 dwellings that Coventry is "required" to build are deemed to not "fit" within the current city boundary and there is no detail within the CC Core Strategy proposed submission. One "reason" given by CC planning office is that any development outside of the boundary is the legal responsibility of WDC and CCC has not legal right to publish or propose what may/may not happen. This lack of information is misleading and certainly not informing the people. Only 26510 dwellings have currently been identified and the remaining numbers are not assigned. This does not inform people.

By law the planning process is designed to be transparent. This process has not achieved this at all.

People have only been made aware of the documents due to attending a local residents meeting. The location of the information on the internet is poorly laid out and is difficult to find. There is no explanation of the reason/insistence on the development of the North/South corridor around Coventry when transport links to the East and West are equally strong.

Officer Recommendation No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1901** Representation in regard to : **6.28**

Verbatim Submission

The document presumes that the land outwith the Coventry city boundary will be used for development without any consultation of the Coventry residents who live on this boundary. In stark contrast, the residents of Warwick District council have been consulted on this, having been given the chance to vote on the preferred location of developments within their district. This is an unfair situation for Coventry residents. The location of land being considered outside the city boundary means that Coventry residents, who will be affected by any decision, fall between the two districts for consultation. As a result, there has been an illegal and unfair lack of any consultation and dissemination of information to these residents.

Since Coventry City Council is looking at the release of green belt land in Warwickshire, it is suspect whether this is sound or legal as it is not within the city boundary. There are many objections to any development of the King's Hill site and although the land is not in Warwickshire, and therefore not in the Coventry core strategy, a full and public consultation is needed with the residents of Coventry. Reasons and objections to the development of the King's Hill area:

Destruction of historical sites
Destruction of special landscape area

Damage to flora and fauna due to devastation of natural habitat (including badgers and newts)

Lack of transport infrastructure

Lack of other infrastructure

Land is prone to flooding

Damage to the distinctiveness of the identities of Coventry, Kenilworth, Bubbenhall, Baginton and Stoneleigh settlements.

Destruction of valuable farmland - particularly in a time where climate change has made it more important to grow food locally and provide food security for the nation.

Officer Recommendation

No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1902** Representation in regard to : **6.28**

Verbatim Submission

National Policy

The Coventry Green Belt Review 2007 is not consistent with national policy. According to the Planning Policy guidance 2 (1995), sections 1.5 and 1.6, green belt land is important for many reasons and this document clearly outlines this.

Planning Policy guidance 2 (1995), sections 1.5 and 1.6, states that green belt land is important for many reasons:

"Purposes of including land in Green Belts

1.5 There are five purposes of including land in Green Belts:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The use of land in Green Belts

1.6 Once Green Belts have been defined, the use of land in them has a positive role to play in fulfilling the following objectives:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, and enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and
- to retain land in agricultural, forestry and related uses."

Any development of the land to the south side of Coventry will drastically reduce the gap between Coventry and Kenilworth (a notable historic town), adding to urban sprawl. The area of proposed development, the King's Hill area also contains notable historic sites (ancient medieval village), areas of ancient woodland (Wainbody wood), a protected hedgerow and a "Special Landscape Area".

The 2007 Green Belt review indicates that development of the Green belt should only occur if it resulted in only modest visual impact - this is defined as 1. Not giving appearance of urban sprawl, 2. Not reducing important gaps between urban area and 3. Not encroaching on open countryside. It is obvious that the proposed development does not meet any of these three criteria. The proposed building of any houses on the King's Hill area to the South of Coventry would fail to satisfy all of the above three points and would be contrary to the prescriptions of the PPG2. The Gap between Coventry and Kenilworth would be reduced to less than half a mile (see point 2 above) - directly contradicting the aim to keep gaps between urban areas and not encroaching on the countryside.

Officer Recommendation

No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1903** Representation in regard to : **6.28**

Verbatim Submission

Green Belt Land, Sites of Interest and Flooding

Any building on the current Green belt would encroach on the open countryside (contrary to guidelines set out in the PPG 2 document).

Green Belt Land, Sites of Interest and Flooding

Also in the Proposed Submission document, paragraph 2.13, it is concluded that there will be minimal impact on any European habitat site. This is a gross over-simplification. While the King's Hill area may not be renowned throughout Europe for Nature, it is however, very important on a local level, particularly considering its proximity to an urban centre. Therefore any proposed development of this site is unsound and not justified. Green belt release would damage areas of significant nature conservation area, for example Wainbody wood - even if it is not built on, it would suffer more vandalism, fly tipping and malicious damage. Although the woodland is just one protected area it is a vital part of the local ecosystem

and has a symbiotic relationship with the surrounding fields and ponds

Flood plain: The Coventry Green Belt Review 2007, section 3.5, point 6 proposes that Green belt land would only be released if "Designated land is not in a defined flood plain". Although many official documents do not refer to flood plains of small flows, the King's Hill area suffers from very poor drainage and is in the flood plain of Finham Brook.

According to local water company information, the King's Hill area, not only receives run-off from the Kenilworth direction, but also from the Canley area of Coventry. Development of this area would have significant impact on the general drainage of the area, causing structural issues for both human activity but affecting the environment for flora and fauna and the hydrogeology.

Visual Impact: The Coventry GBReview of 2007, section 3.5, point 2 proposes that the green belt land would only be released if the ...

"release of significant green belt land would not significantly harm or detract from views of the city centre or of nearby historic towns (PPG2, purpose 4)". Although the city centre does not view this area directly, there would be significant visual impact from other areas.

Any development of this area would be highly visual and would not be discrete or subtle on the landscape for those people living either in the Finham area, travelling along the A45 or those living in the King's Hill area.

Officer Recommendation

No change

Representation number: **1904** Representation in regard to : **6.28**

Verbatim Submission

Green Belt Impact of Development:

According to the Coventry Green Belt Review, section 3.5. point 1: "Areas of land for release from Green Belt designation will only be recommended if built development on them would result in only modest visual impact on the open character of the Green Belt in the surrounding area. Modest visual impact is defined here as not giving the appearance of urban sprawl. reducing important gaps between urban areas and encroachment of the open countryside. thereby addressing purposes 1,2 and 3 of Green Belt in PPG2."

It is quite clear that any development of the King's Hill area, to the south of Coventry is in conflict with this statement because the undeveloped, green space between Coventry and Kenilworth would be reduced to less than half a mile.

The current countryside in this area contains several sites of note and includes a "Special Landscape Area"

Officer Recommendation

No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1905** Representation in regard to : **6.28**

Verbatim Submission

Character and Cohesion of the Green Belt

The Coventry Green Belt Review, 2007, section 3.5, points 3 and 4 states that: "In green wedge areas of Green Belt the release of land for built development will only be recommended if the linear cohesion and openness of that green wedge is not significantly damaged." And "The addition of designated Green Belt land (including in green wedges) will be recommended only if it would significantly enhance the purposes, character or cohesion of the Green Belt."

Character and Cohesion of the Green Belt

Any development (particularly a sizable one) would greatly affect the area of Green Belt. In disagreement with some of the documents published by Coventry City council, many people consider the area of green belt bounded by the A45, Green Lane, Kenilworth Road (and the Coventry railway line) and Stoneleigh as a "wedge". Any development would lead to this being lost and would result in a severance of the green belt around the south side of Coventry. Although the Green Belt would continue the other side of the A45, towards Stoneleigh, the A45 is a major dual carriageway with no general pedestrian/cycle crossings to link the Finham area to the Green belt.

Officer Recommendation No change

Representation number: **1906** Representation in regard to : **6.28**

Verbatim Submission

Wildlife, Nature Conservation and Historical Sites

Green Belt Review 2007, section 3.5, point 5 states that "The release of designated Green Belt land would not damage areas of significant nature conservation value (i.e. Site of Importance for Nature Conservation [SING] or higher)." While these sites may be small in one sense, they are an important

part of the local area and have significant flora and fauna. Development of such a site cannot be justified on this basis. Wildlife, Nature Conservation and Historical Sites

In the Core Strategy Proposed submission document, paragraph 2.13 states that it has been concluded that "that there would be minimal effect on any European sites that would be affected by the Strategy". It is unjustifiable to compare a small local area with the rest of Europe; an assessment of it's value to the local area is far more important., not only in terms of the wildlife and conservation but also how it benefits a community. The area of King's Hill contains Wainbody Wood - protected ancient woodland, a historic, protected hedgerow and several ponds. This whole area is a habitat for many different species of animals including badgers, newts, bats, owls and many others. Even if Wainbody wood was not built on, it would suffer more vandalism, fly tipping and malicious damage. Although the woodland is just one protected area it is a vital part of the local ecosystem and has a symbiotic relationship with the surrounding fields and ponds. The field provide food sources for animals that inhabit the woodland etc.

Also in the King's Hill area, there is a registered ancient medieval monument - that of an abandoned medieval village. Although this is not so much a tourist attraction, it is important archaeologically to the area. The King's Hill area also has some old mine shafts, these, although unused for some time could affect the geological integrity of the area.

Officer Recommendation No change

Kings Hill

Representor number **REP-1048**

Representor : **Ms Alana Collins**

Representation number: **1908** Representation in regard to : **6.28**

Verbatim Submission

Water supply, Flooding and Drainage

Although there is not a significant river that passes through the King's Hill area, the area contains the Finham Brook. The fields of the King's Hill area contain very poor drainage and there is a significant level of run-off onto Green Lane. On occasions of more significant rainfall, the lower end of Green Lane in particular can become flooded. The fields do not have good natural drainage so natural run-off occurs onto the side of Green Lane.

Water supply, Flooding and Drainage

The King's Hill area also received drainage from the Canley area of the city due to the geology and general aspect of the land.

Development of man-made structures on this site would only add to drainage problems

At the top of Green Lane/Gretna Road, there is a bore hole for the local water supply. Contamination from pesticides is already a problem. Any proposed development would not only pose additional contamination risks but would affect the natural water table. This would affect the availability of water to the area but also add to drought problems which are already an issue due to current climate change. Drought has significant impact on the flora and fauna but can affect soil fertility too.

Officer Recommendation No change

Representation number: **1909** Representation in regard to : **6.28**

Verbatim Submission

Transport network and Infrastructure:

According to the Coventry Green Belt Review 2007, section 3.5, point 7: "Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking / cycling routes and social/community / leisure facilities) are easily accessed."

Transport network and Infrastructure:

The road network around the proposed King's Hill development (implied in Core Strategy, proposed submission paragraph 6.28) are currently not satisfactory to support any additional development (residential or otherwise).

Additional development would cause further gridlock along local roads (namely the A45, St Martins Road, Kenilworth Road and Stoneleigh Road). This would lead to great pressure for a southern relief road - this would cause even greater delays in any time plan due to the processes of planning permission, hold ups, controversy in the community and the landscape and environmental damage. Any widening of Kenilworth Road between the junction with the A45 and the Gibbet Hill junction

would encounter significant resistance and would damage one of Coventry's premier approaches.

The road infrastructure required for King's Hill is not deliverable in a timely, economic and sustainable manner and such developments are not in accordance with the correct purposes of the green belt contained within purposes 1,2,3 of the PPG 2 i.e. "capable of being developed in a sustainable way and readily integrated into with the existing built - up area

In terms of infrastructure other than the road network, there are insufficient facilities to accommodate an additional population in the area to the south of the Green Lane area of Coventry. Namely schools, health care provision, community facilities etc. Section 3.5, point 7 of the Coventry Green Belt review 2007 states "Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking / cycling routes and social/community / leisure facilities) are easily accessed."

The protected hedgerow should remain uninterrupted and therefore full provision of facilities would have to be made alongside any development. It would be catastrophic to any new development to be established without these facilities.

Officer Recommendation No change

Kings Hill

Representor number **REP-1049**

Representor : **Mr Robert Donnelly**

Representation number: **1899** Representation in regard to : **6.28**

Verbatim Submission

The need for 33500 homes has not being proven of which 3750 would be sited on the Kings Hill area to the south of Coventry, NOT within Coventrys boundary. This makes the core strategy unsound. Pressure on the local infrastructure would be enourmous ie water, sewage and transport. This area is not walkable to any major shopping centres so the need for a car would be paramount to new residents. Kings Hiill has not being mentioned by Coventry in the strategy only that land outside of its boundaries maybe needed, this is not sound. Warwick district council has being open about their preference to this site. Natural habitat of animals must be taken into consideratiojn. The policy is vague on this subject

Officer Recommendation

No change

Kings Hill

Representor number **REP-1067**

Representor : **Mr Stephen Trinder**

Representation number: **1961** Representation in regard to : **6.28**

Verbatim Submission

The core strategy and most especially paragraph 6.28 of the strategy - is not justified because it is not the most appropriate strategy when considered against the reasonable alternatives. The paragraph states 'land maybe identified on the edge of Coventry..'. 'If enough land cannot be found within the city's boundaries'. This does not specify the number of houses that will be built before this happens. 6.28 is not a reasonable strategy when Brownfield land remains in the city boundary.

Officer Recommendation No change

Representation number: **1962** Representation in regard to : **6.28**

Verbatim Submission

The roads and other infrastructure the proposed Kings Hill Urban Extension (implied in the core strategy para 6.28) would need are not deliverable in a sustainable fashion and could not be 'readily integrated with the existing built-up area so that existing and extended key services and facilities are easily accessed' - for quote see Coventry Green Belt Review, 2007 Section 3.5 Point 7.

Officer Recommendation No change

Representation number: **1963** Representation in regard to : **6.28**

Verbatim Submission

6.28 of the core strategy is not effective because it is not deliverable - it fails to set out how the 'vision, objectives and strategy for the area will be delivered'. For the Kings Hill Urban Extension all it says is that land 'may be identified on the edge of Coventry in the administrative areas of Warwick D C and Nuneaton and Bedworth Borough Councils'. It is not able to be monitored because it is not a set out policy.

Officer Recommendation No change

Kings Hill

Representor number **REP-1067**

Representor : **Mr Stephen Trinder**

Representation number: **1964** Representation in regard to : **6.28**

Verbatim Submission

Planning policy guidance (PPG2) purposes 1,2 and 3 implementation allows green belt development that would result in modest visual impact. This is defined as 1) not giving the appearance of urban sprawl 2) not reducing important gaps between urban areas 3) not encroaching on open countryside. The Coventry Green belt review of 2007 proposes that green belt around Coventry would only be released if these conditions were met.

Section 3.5 Point 1 of the Coventry Green Belt Review, 2007

Sections 3.4 and 3.5 of the Coventry Green Belt Review, 2007 says that areas of land will only be released from green belt designation if built development would result in only modest visual impact on the CPW character of the green belt in the surrounding area.

Modest visual impact is defined here as 1. not giving the appearance of urban sprawl, 2. reducing important gaps between urban areas, and 3. encroachment of the open countryside.

The site, location, and scale of the proposed Kings Hill Development would fail to satisfy all three criteria and would be contrary to the prescriptions of PPG2.

The gap between Coventry and Kenilworth would be reduced to about a third of a mile. If the Finham Development was allowed.

Section 3.5 Point 5 of the Coventry Green Belt Review, 2007

The Green Belt Review, 2007 (Coventry's Review) would only allow Greenbelt release if the release 'would not damage areas of significant nature conservation area (i.e. sinc or higher)'

The Kings Hill Development would have a significant adverse effect on Wainbody Wood LNR. This is ancient woodland; probably the best remaining in the immediate vicinity, and it would inevitably suffer more vandalism, fly tipping and malicious damage.

Section 3.5 Point 2 of the Coventry Green Belt Review, 2007

Proposes that Green Belt land would only be released if,

'Release of designated green belt would not significantly harm or detract from views of the city centre or nearby historic towns (PPG 2 Purpose 4)'.
Building over Kings Hill would significantly harm and detract from its views of the City Centre.

This is a scenic viewpoint that commands fine views of the city and the surrounding landscape.

Section 3.5 Point 6 of the Coventry Green Belt Review, 2007

Proposes that Green Belt land would only be released if,

'designated land is not in a defined floodplain'.

Part of the suggested King's Hill site is in the floodplain of Finham Brook.

Officer Recommendation

No change

Kings Hill

Representor number **REP-1067**

Representor : **Mr Stephen Trinder**

Representation number: **1965** Representation in regard to : **Core Strategy Proposed Document**

Representor number **REP-1067**

Representor : **Mr Stephen Trinder**

Verbatim Submission

The Core Strategy Proposed submission of March 2009 is not deliverable, not flexible, and not able to be monitored because it is incomplete, and a significant part of Coventry's projected growth in dwellings - as indicated by Coventry's adoption of the RSS preferred option - does not appear in this March 2009 document.

The Core Strategy proposed submission is not deliverable because it does not show how 'the vision, objectives and strategy for the area will be delivered'

This is because only 26,510 dwellings needed by the core strategy have been identified and their proposed sites of location described in the core strategy proposed submission. This is out of a total of 33,500 that the RSS preferred option deems to be needed, and which Coventry has adopted.

It appears to me - and to many others fighting these 'proposals' - that a key part of this approx 7000 shortfall will be, or could be, land in Finham; land currently owned by a neighbouring authority.

Absolutely nowhere in the core strategy proposed submission is this potential land take, infrastructure upgrading and source of great potential danger mentioned. Such a development would put thousands of extra vehicles on to already heavily burdened roads, along which 3 schools are sited.

Yet Despite

1. Finham clearly being marked as a place for possible outward expansion of the city in option E of the 'emerging strategy - November 08' document (issued by Coventry City Council).
2. Finham Residents' Association's annual general meeting, packed out with worried residents, being addressed by Niall McChesney (Development Plans Team Leader, Coventry City Council).
3. Local farms, Residential Properties and businesses in the King's Hill area being issued with notification of possible compulsory purchase notices and undergoing ecological surveys to assess possible biodiversity loss through development.

Yet Still

The Coventry Council Core Strategy proposed submission 2009 makes no mention of expansion into Finham.

This Document

Is 1. now deliverable because it is incomplete, 2. now flexible because, being incomplete it cannot adapt to changing circumstances and certainly 3. not able to be monitored, because it being incomplete, authorities do not know exactly what precisely they are monitoring.

This Coventry Council Core Strategy proposed submission of March 2009 is unsound because it, and all of the other documents put forward in support of Coventry's development plan document, fails to specify where growth in the north-south corridor would be located, how many dwellings there would be, and how infrastructure would be altered to service them.

At their February 2007 meeting, Coventry Council endorsed the approach advocated by the Coventry, Solihull and Warwickshire Forum (CSW Forum) that Coventry should be the focus of growth within the region and at the core of a north south growth corridor and that there may need to be:

- " Release of some green belt land close to the core development area (North/South Corridor)
- " Balanced provisions of housing and employment
- " Significant upgrading of public and other transport networks.

Yet Despite

This February 2007 meeting, and Coventry raising its RSS allocation from 13600 new dwellings to 33500 (The RSS preferred option), still there is no description in the 2009 proposed for

Kings Hill

Representor number **REP-1067**

Representor : **Mr Stephen Trinder**

submission core strategy of where this growth would be located.

This development is unsound, and Coventry is relying upon doing a deal with Warwick district Council to fulfil its unsustainable expansion, thus freeing them of the need to inform us and consult properly.

LEGAL COMPLIANCE

The March 2009 proposal for submission core strategy is not legally compliant because its lack of full disclosure fails to comply with the statement of community involvement (SCI) issued by Coventry City Council.

The rest is attached

Officer Recommendation No change

Representor number **REP-1068**

Representor : **Mrs Samantha Hyndman**

Representation number: **1966** Representation in regard to : **6.28**

Verbatim Submission

If the land of Kings Hill along the Coventry Border is used there has been no consultation with residents. Warwick residents have been consulted given the right to vote why are we not given the same consideration and right of say. This is unfair. Coventry City Council are also looking at this land which is not within Coventry's boundaries, believe this is not sound.

The use of this land is not justifiable because it could destroy historic sites. Medieval villages, marl pits, finds pots - Bronze Age pot, quarry pits - medieval - imperial. History can also be found in historic trees and hedgerows as the area dates back many hundred y ears. This should be preserved and not lost.

Damage to badger sets in Kings Hill area. These creatures should not have their habitat disrupted.

Officer Recommendation No change

Representor number **REP-1069**

Representor : **Mr Richard Keylock**

Representation number: **1968** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

1. The existing infrastructure would not cope with a development of this magnitude. Road congestion is already a major issue on Stoneleigh Road.

2. Development near Kings Hill will exacerbate the already known flooding issue near to Green Lane.

3. To destroy Green Belt land destroying Medieval Woodland/hedgerows and settlements, badger sets, and pond land is not justified.

4. Change in climatic/economic conditions - housing industry now on its knees as purchases are lowest for 30 years.

Officer Recommendation No change

Kings Hill

Representor number **REP-1071**

Representor : **Miss Sharandeep Kaur Lakhpuri**

Representation number: **1971** Representation in regard to : **6.28**

Verbatim Submission

Coventry's Development Plan is not legally compliant as residents of Finham were not made aware of the Council's intentions to propose a massive development of dwellings in the area, and nor were the resident made party to the consultation process. No official communication(s) was made to residents and thus we were unable to participate in any consultations or representations, and thus effectively have a say in this matter which would/will greatly impact on us. As the resident's association was only made aware of the King's Hill development approx around the 23rd March 2009, it rendered residents disqualified from registering to make representations to the West Midlands Sub Group's Regional Spatial Strategy and thus put forward our concerns, views and objections at the Public Examination on the June 4th 2009. The only indication of Coventry City Council's (CCC) proposed strategy to build substantial dwellings in the Finham/Kings Hill area came from paragraph 6.28 on page 11 of the Coventry's Development Plan. 'The RSS Preferred Option requires that sufficient land will be identified to meet the minimum net requirement of 33,500 new dwellings in or on the edge of the City up to 2026. If enough land cannot be found within the city's boundaries, land may be identified on the edge of Coventry in the administrative areas of Warwick District Council and Nuneaton and Bedworth Borough Councils. However as the document itself, and/or the RSS was not brought to the attention of Finham's residents, we were ignorant of the whole situation, and thus unaware that the Coventry's Development Plan existed, and what it potentially would lead to. Finham Residents Association (FRA) only became aware of the 'Coventry overspill situation' on 23rd September 2009, when a meeting was held by the FRA to discuss Warwick District Council's (WDC) preferred option choices. Furthermore this was not a voluntary admission from CCC, as this information was communicated by WDC's Planning Officer. Even then CCC's Planning Officer was not forthright with information and only belligerently admitted this 'overspill situation' when coerced by concerned residents. The consequent of this was, as stated above, FRA were unable to make representation at the Public Examination on the June 4th 2009 and thus Coventry's Development Plan, the Public Examination and all other processes were conducted in an undue manner.

Officer Recommendation No change

Representor number **REP-1096**

Representor : **Mr Bruce Jones**

Representation number: **2053** Representation in regard to : **6.28**

Verbatim Submission

Requires re-zoning of green belt land, and implementation of major sub structure support in terms of road system, drainage, water supply etc. Also appear to be very intense (10800 dwellings PLUS) on relatively small parcel of land. Environmental impact likely to be high with development of flood plain.

Officer Recommendation No change

Representor number **REP-1111**

Representor : **Mrs Jacqueline Jones**

Representation number: **2085** Representation in regard to : **6.28**

Verbatim Submission

Requires re-zoning of green belt land, and implementation of major sub structure support in terms of road system, drainage, water supply etc. Also appear to be very intense (10800 dwellings PLUS) on relatively small parcel of land. Environmental impact likely to be high with development of flood plain

Officer Recommendation No change

Kings Hill

Representor number **REP-1112**
Representor : **Mr Graham Reynolds**

Representation number: **2086** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

The Core Strategy has not been effectively communicated to the public and response is difficult: Few, if any on the 250+ at the meeting in Finham Park School 23-03-09 were aware. The use of the internet to communicate DPD is not sound, not everyone has it, or is able to use it. Trying to get to the Core Strategy within www.coventry.gov.uk is difficult, a number of pages exist. The link to [..../ldf](#) not always works and suggests down loads of many large documents. This form is no longer the correct one to ask people to use according to Planning Aid. People trying to use it fail and report they must hand paper copies in. The Core Strategy should have been communicated in all local newspapers and by letters to the residents of Coventry directly. The Coventry Corp. web site is poorly designed and confusing, all references to the core strategy should go to a single point. The latest methods of replying to planning strategy as advised by such bodies as Planning Aid or the Royal Town Planning Institute should be used. This form and the Guidance notes are for experts not the general public which it successfully repels.

Officer Recommendation No change

Representor number **REP-1115**
Representor : **Ann Bush**

Representation number: **2089** Representation in regard to : **6.28**

Verbatim Submission

6. Since Coventry City Council is looking to release green belt land in Warwickshire, it is suspect whether this is sound as legal as it is not within City boundary.

As a result there has been an illegal and unfair lack of consultation. Land is not in the Coventry core strategy

Officer Recommendation No change

Representor number **REP-1117**
Representor : **Mr Ronald Dickinson**

Representation number: **2091** Representation in regard to : **6.28**

Verbatim Submission

6. We were not made aware of this - lack of consultation. Taking land from Green Belt. Prevent neighbouring towns from merging into/another to retain land in agricultural forestry and related uses.

Officer Recommendation No change

Representor number **REP-1118**
Representor : **Patricia Freeman**

Representation number: **2092** Representation in regard to : **6.2**

Verbatim Submission

6. Having not seen plans of the site, I realise that all those houses are not really eligible to the Finham community. How are schools being able to cope and what is the strategy to deliver arrangements for buses, church and shops etc.

Officer Recommendation No change

Kings Hill

Representor number **REP-1119**

Representor : **Angela Fryer**

Representation number: **2093** Representation in regard to : **6.28**

Verbatim Submission

Character and cohesion of the Green Belt - The Coventry Green Belt Review 2007 section 3.5 states the "In green wedge areas of Green Belt the release of land for built development will only be recommended if the linear cohesion and openness of the wedge is not significantly damaged". Any development would greatly affect the area of Green belt. The wedge bounded by the A45, Green Lane, Kenilworth Road and Stoneleigh would be lost and result in the destruction of the Green Belt on the south side of Coventry.

Officer Recommendation No change

Representation number: **2094** Representation in regard to : **6.28**

Verbatim Submission

6. The submission presumes that land outside the Coventry boundary will be required to meet the target number of houses to be built. There has been no consultation with Coventry residents living on the boundary. Warwickshire Council consulted with all residents who were given the opportunity to vote on their preferred options whereas Coventry residents who will be directly affected have not been afforded the same opportunity. The reason given for lack of consultation on these proposals for the south boundary was that the land lies outside the city and is therefore the responsibility of Warwick Council. However, it is Coventry City Council who are seeking the land for housing that it deems cannot be met within the City. Therefore, it should be the duty of the Council to inform those residents who would be affected by their proposals. All planning should be transparent and open to public debate and therefore the legal requirement has not been met.

This form in itself is difficult to locate on the website and not user friendly. This has concerned many people who feel unable to express their opinions because of the restrictions and formality of the form. This also prevents open debate.

Officer Recommendation No change

Representor number **REP-1120**

Representor : **Dawn Keylock**

Representation number: **2095** Representation in regard to : **6.20**

Verbatim Submission

6. We were as residents not consulted to ensure the consultation processes were effective. Only made aware March 23 2009 thus unable to register to make representation to the West Midlands sub group Regional Spatial Strategy. Thus these actions are not legally sound and I would suggest the whole proposals in void in its process

Officer Recommendation No change

Representor number **REP-1121**

Representor : **Shirley Hughes**

Representation number: **2115** Representation in regard to : **6.28**

Verbatim Submission

The Coventry green belt review 2007 section 3.5(3 and 4) refers to green wedge development criteria. Any development along Green Lane would greatly affect the area of green belt on south side.

Officer Recommendation No change

Representor number **REP-1122**

Representor : **Dr Ian Thompson**

Representation number: **2116** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

Green belt damage
Urban sprout

Officer Recommendation No change

Kings Hill

Representor number **REP-1123**

Representor : **Mr Jayson Craven**

Representation number: **2117** Representation in regard to : **6.28**

Verbatim Submission use of land is not justified and could destroy historic sites and medieval villages. It dates back hundreds of years. It should be preserved as green belt.

Officer Recommendation No change

Representor number **REP-1124**

Representor : **Susan Pickering**

Company: **Finham Action Group**

Representation number: **2118** Representation in regard to : **5.13**

Verbatim Submission The core strategy is unsound because it would require the development of a sustainable infrastructure. Everyday the traffic along Stoneleigh Avenue to Gibbet Hill is grid locked as far back at Stoneleigh Village. Any further development in the area would create greater problems. The development of this area would be very expensive and could be achieved more cheaply elsewhere.

Officer Recommendation No change

Representation number: **2119** Representation in regard to : **Policy EQ 2 - Green Belt**

Verbatim Submission The core strategy is unsound because it would require the development of a sustainable infrastructure. Everyday the traffic along Stoneleigh Avenue to Gibbet Hill is grid locked as far back at Stoneleigh Village. Any further development in the area would create greater problems. The development of this area would be very expensive and could be achieved more cheaply elsewhere.

Officer Recommendation No change

Representation number: **2120** Representation in regard to : **Policy Area EQ 5 - Biodiversity, Geological, Landscape and Archaeological Conservation**

Verbatim Submission The core strategy is unsound because it would require the development of a sustainable infrastructure. Everyday the traffic along Stoneleigh Avenue to Gibbet Hill is grid locked as far back at Stoneleigh Village. Any further development in the area would create greater problems. The development of this area would be very expensive and could be achieved more cheaply elsewhere.

Officer Recommendation No change

Representation number: **2121** Representation in regard to : **Policy SG 7: Provision of New Housing**

Verbatim Submission The core strategy is unsound because it would require the development of a sustainable infrastructure. Everyday the traffic along Stoneleigh Avenue to Gibbet Hill is grid locked as far back at Stoneleigh Village. Any further development in the area would create greater problems. The development of this area would be very expensive and could be achieved more cheaply elsewhere.

Officer Recommendation No change

Kings Hill

Representor number **REP-1128**

Representor : **Andrew and Gill Walton**

Representation number: **2126** Representation in regard to : **6.28**

Verbatim Submission

The proposal to use green belt land between coventry and kenilworth is contrary to the objective of preventing neighbouring focus from merging into one another. any development on kings hill will almost certainly join the two urban areas together.

Officer Recommendation No change

Representation number: **2127** Representation in regard to : **6.28**

Verbatim Submission

It appears that coventry and WDC are preparing to compete for the same ground. The WDC further intends to rely on coventry infrastructure to make their plans viable. With both local authorities proposing large developments, the plans are clearly not viable

Officer Recommendation No change

Representation number: **2128** Representation in regard to : **6.28**

Verbatim Submission

Any development on kings hill will have a serious negative impact on the green lane area. The infrastructure is already stretched on many fronts

1. Road network. ACross to green lane is severely restricted by th A45. Only one junction (St Martins Road) roundabout has full in/out access and this is shared with longer distance commuter traffic.

2. The schools are up to capacity and there is no plans to expand them (rightly in view of the access and parking problems)

3. THere are no community facilities.

4. There are few shops.

5. There is no health centre.

6. There are no dentists.

Officer Recommendation No change

Representation number: **2129** Representation in regard to : **1.4**

Verbatim Submission

We understand that representation about the core strategy had to be made by 8th December, but we were not made aware of the document until March 2009. The presence of the document on the website is insufficient if we are not appraised of it.

Officer Recommendation No change

Representation number: **2130** Representation in regard to : **6.28**

Verbatim Submission

The core strategy states "land may be identified on the edge of coventry in the administrative areas of warwick district council....."

The document does not proceed to identify the precise locations of these proposed developments. This does not satisfy the requirements of the regional spatial strategy. The omission of precise details also prevents any adequate representation concerning the soundness of the proposal. it would be unfair to adapt a document that does not set out precise plans concerning environment, transport, infrastructure etc.

Officer Recommendation No change

Representor number **REP-1129**

Representor : **Mr George McDonald**

Representation number: **2131** Representation in regard to : **6.28**

Verbatim Submission

The road infrastructure required will not be delivered in a timely sustainable manner, giving gridlock to all access roads for all local amenities.

Officer Recommendation No change

Kings Hill

Representor number **REP-1131**

Representor : **Mrs Abigal Rae**

Representation number: **2133** Representation in regard to : **6.64**

Verbatim Submission

The concept of providing adequate employment land is based on the out of date studies of future needs. The info has not been updated to take into account the current economic climate. The nature of employment has changed and much larger employment companies have closed resulting in loss of employment. Currently there are over 21000 unemployed in coventry and warwickshire.

Officer Recommendation No change

Representor number **REP-1132**

Representor : **Miss Hazel Round**

Representation number: **2134** Representation in regard to : **6.28**

Verbatim Submission

Residents have not been aware of many issues of the proposed core strategy. Even to the extent that many people have only just been made aware of the opportunity to express their views.

Officer Recommendation No change

Representor number **REP-1133**

Representor : **Mr Roland Lucas**

Representation number: **2135** Representation in regard to : **Core Strategy Proposed Document**

Verbatim Submission

At no point have the local council been open and transparent in these proceedings. This document I recieved only today. 07/05/09 for example.

Officer Recommendation No change

Kings Hill

Representor number **REP-1136**

Representor : **Miss Kathy Boulton**

Representation number: **2142** Representation in regard to : **6.28**

Verbatim Submission

I consider the DPC is unsound because:

- Despite the fact that this development would have a devastating effect on the residents of Green Lane and surrounding area (as the boundary runs along Green Lane) and Coventry City Council were aware of this proposal, the residents were not consulted whereas the residents of Warwick District Council were notified of development suggestions and allowed a vote.
- Coventry City Council did not comply with its own Statement of Community Involvement (SCI), Section 1.7 which states: "our vision is a city where... all stakeholders, elected members and officers have a high level of awareness of planning policy and processes and built environment quality issues". A full and public consultation is needed with the residents of Coventry.
- The release of Green Belt is illegal. The Coventry Green Belt Review 2007, section 3.5, point 6 proposes that Green belt land would only be released if "Designated land is not in a defined flood plain".
- The area of King's Hill contains Wainbody Wood - a protected ancient woodland, an ancient protected hedgerow (along Green Lane), and several ponds. This whole area is a habitat for many different species of animals including badgers, newts, bats, owls and many others. Even if Wainbody Wood was not built on, it would suffer vandalism, fly tipping, malicious damage and disturbance. Although the woodland is just one protected area it is a vital part of the local ecosystem and has a symbiotic relationship with the surrounding fields and ponds.
- This development would merge Coventry with Kenilworth
- There is a lack of infrastructure to cope with the increased traffic. The roads in the Finham/Green Lane area are inadequate and Stoneleigh Road already suffers from extensive traffic jams at rush hour and when there are events at the NAC.
- The King's Hill area suffers from very poor drainage and is in the flood plain of Finham Brook. Development of man-made structures on this site would only add to drainage problems and added pressure on Finham Sewerage Works.

Officer Recommendation

No change

Kings Hill

Representor number **REP-1137**

Representor : **Mr Malcolm Clement**

Company: **Finham Residents Association**

Representation number: **2143** Representation in regard to : **3.12**

Verbatim Submission

Development Outside Coventry City Boundary.

Development outside the edge of the city boundary could be necessary in order to generate sufficient space to meet the government quota of housing for Coventry. The proposed submission document does not clearly indicate where this is likely to happen, thus leaving residents of boundary regions of the city completely unaware of how they will be affected. Neighboring local authorities have their own core strategies and it is not at all clear how their proposals will blend with Coventry's needs.

Officer Recommendation

No change.

Representation number: **2144** Representation in regard to : **7.31**

Verbatim Submission

Removal of School Playing Fields from Green Belt Status.

The proposals threaten total loss of school playing fields at Finham Park and Finham Primary schools. There has been gradual erosion of school playing fields for about 20 years through sale of land for development. This conflicts with current government policy. Although there is mention of safeguards and special circumstances there is no clearly defined interpretation of how, and under what circumstances, the safeguards will be applied.

Officer Recommendation

No change. It is not for CCC to determine where WDC makes allocations.

Representation number: **2145** Representation in regard to : **6.28**

Verbatim Submission

Drainage, Flooding and Water Supply.

Finham Brook runs through the King's Hill area and in periods of heavy rain it floods the junction of the B4113 and B4115 roads. The fields in the area have poor drainage and man-made development of buildings and roads on this site would add to existing drainage problems.

Near the Green Lane/Gretna Road Junction there is a borehole for the provision of local drinking water supplies. Development of King's Hill would worsen the existing contamination risks and would affect the natural water table.

Officer Recommendation

No change. It is not for CCC to determine where WDC makes allocations.