

### Report to

Scrutiny Board 3  
Scrutiny Co-ordination Committee  
Cabinet

24 June 2009  
24 June 2009  
29 June 2009

### Report of

Director of City Development

### Title

Coventry's Core Strategy

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## 1 Purpose of the Report

- 1.1 The purpose of this report is to advise of the representations received to the Core Strategy and to seek authority to submit it for examination subject to certain minor amendments

## 2 Recommendations

- 2.1 The Scrutiny Board 3 are asked to consider this report and convey their comments to the Cabinet
- 2.2 The Cabinet are asked to:
- (a) consider the responses to the representations received, including a petition; and
  - (b) consider the comments of Scrutiny Board 3; and
  - (c) authorise the submission to examination of the Core Strategy as amended in accordance with the attached schedule.

## 3 Information/Background

- 3.1 The Core Strategy sets out the vision, objectives and strategic policies for the future development of the City over the next twenty years. It will be a major part of Coventry's Local Development Framework (LDF) and will be the spatial expression of a combination of the Sustainable Community Strategy, regional planning policy and national planning policy. The Core Strategy and other parts of the LDF will form the statutory development plan for the City, along with the Regional Spatial Strategy (RSS) for the West Midlands.
- 3.2 The LDF will also include a City Centre Area Action Plan, and an "emerging strategy" is expected to be published for consultation in September 2009. This will build on the work undertaken so far in developing the Core Strategy and various different quarters of the city centre and in particular the Jerde masterplan and the Draft Urban Design Framework Supplementary Planning Document which Planning Committee has approved for public consultation.

- 3.3 The Regional Spatial Strategy (RSS) is part of the development plan and its Phase Two review, considering housing, employment, centres, waste and transport is the subject of Examination in Public that started in April and will conclude at the end of June 2009. At the Examination, debate has centred around likely levels of growth to 2026 and how it should be distributed, with the government office advocating higher levels of provision. Strong representations have also been made looking to remove phasing policies. These have been resisted by the West Midlands Regional Assembly (WMRA) representatives. Representations have been made to the Panel by the Eastern Green Residents Association in support of the Core Strategy retaining land north of Eastern Green in the green belt. Those with interest in the land have sought to have it identified for development. Similarly the Keresley Parish Council opposed the Keresley eco suburb but representatives of those with developers interests in the area supported it, although some were opposed to the comprehensive planning of the area and the eco suburb concept and wished to see the site brought forward early. Representations were also made in respect of the land at King's Hill and Finham as a site that may be included in the Warwick Core Strategy.
- 3.4 The Phase Three revision dealing with rural renaissance, sites for gypsies, travellers and travelling show people, culture, sport and tourism; environment and minerals is underway and it is expected that this will be subject of consultation over the summer.
- 3.5 The Core Strategy must be prepared in accordance with the RSS and the Regional Assembly have confirmed compliance with this requirement.
- 3.6 In March 2009 Council resolved to approve the Proposed Submission document for Coventry's Core Strategy. This was the accumulation of work that started in 2006 and has included 3 specific stages of consultation intended to engage local communities and key players. The document, and a number of supporting documents were made available on the web site and in local libraries and a press notice in the Coventry Evening Telegraph invited representations between 19 March 2009 and 7 May 2009. This period was extended beyond the statutory minimum 6 weeks because of bank holidays within the period. Letters advising of the representation period were sent to all statutory consultees and the 1 220 individuals and groups on our database. During the representation period officers have attended a meeting in Keresley, and have taken a number of enquiries relating to the document. A meeting of the Residents Forum to which all residents groups are invited was also held to give more publicity to the proposals and assist in helping participation in the process. Officers also provided advice and information to many groups and individuals on the telephone
- 3.7 A CD in the members lounge includes Schedule 1 to this report that details all of the representations received within the period and the recommended response that will be forwarded to the Inspector appointed to consider the soundness of the Core Strategy. The examination process is that the Inspector assesses the whole document for legal compliance and soundness. This means dealing with the main issues covered by the plan and that hearings will be based on the Inspector's decision of which matters need consideration. The process after submission is in the hands of the Inspectorate and they estimate up to 9 months between submission and the production of the Inspector's binding report.
- 3.8 Responses have been received from a number of statutory consultees including Government Office, infrastructure providers, local authorities and other agencies. Generally these representations indicate support for the Core Strategy and suggest amendments to provide greater clarity.

- 3.9 Around 120 organisations, groups or individuals have submitted representations. Some of these relate to more than one policy area. Broadly these representations can be grouped into those that:
- a) oppose any alterations to the green belt as proposed at Keresley (22), Cromwell Lane/Duggins lane (25), Gibbet Hill or Sutton Stop (1) and Lentons Lane (11)
  - b) oppose any development at land in the administrative area of Warwick at Kings Hill (32)
  - c) advocate or oppose development of specific sites and or policies
- 3.10 It is disappointing that despite the efforts to engage that have included additional stages of consultation and regular updates at the quarterly Residents Forum and attendance at various other meetings, there are still representations on the basis that the city has not adequately involved the community in plan development. This claim is made by those that oppose Keresley even though there was a packed public meeting in November 2007 attended by the then Cabinet Member and representations have been received opposing changes to the green belt at each stage. It is the case that in respect of sites at Cromwell Lane/ Duggins Lane and Sutton Stop that whilst earlier documentation has warned of the likely requirement for green belt release these were not identified specifically until the joint green belt study was published in February 2009. It is inevitable that the identification of sites within and outside the green belt focuses attention. Representations have also been received that advocate release of further green belt land at Duggins Lane and at Browns Lane but no change is being recommended.
- 3.11 A number of representations relate to the allocation of land at Kings Hill in the administrative area of Warwick. Development at Kings Hill is not proposed by the Core Strategy which cannot relate to land outside the city boundary. Copies of the representations received will be forwarded onto Warwick District Council. The Core Strategy does indicate that it will be necessary for Nuneaton & Bedworth and Warwick local planning authorities to make provision in their core strategies for around 7000 dwellings adjacent to the city boundary. Options for future development at Kings Hill have been considered by Warwick District Council, whose officers have already attended meetings within the city boundary to ensure that opportunity is provided to engage in the plan preparation process for Warwick.

#### **4 Proposal and Other Option(s) to be Considered**

- 4.1 The Core Strategy has reached the stage where it should be referred to an independent planning inspector who will publish a binding report. However, the Council has the opportunity in response to the representations received to make minor changes prior to submission.
- 4.2 Your officers have considered with the Cabinet Member (City Development) all of the representations. A full schedule (schedule 2) included on the disc in the Members Lounge details the amendments recommended to be made to add clarity to the Core Strategy and address at least in part the representations received. Appended to this report is a schedule that details the minor changes to policies together with a plan showing changes to the Proposals Map.
- 4.3 The representations received regarding the Lentons Lane site and subsequent technical investigations have demonstrated that that the proposal to allocate the site for long term housing is not viable principally because of previous shallow mining works and it is therefore recommended that this site be deleted as an allocation and the site be retained in the green belt.

4.4 In the case of Keresley, this has been indicated as an area of search since 2007 and there have been representations opposing development in the area at each stage. A petition has been submitted by Councillor Mrs Bigham with signatories from the Keresley area and beyond that states:

"We the undersigned are in strong opposition of any intrusion by development within the Green Belt in the Keresley area."

4.5 It is recommended that the Keresley eco-suburb policy be retained but that wording be strengthened to ensure a comprehensive consideration of the masterplan of the area. Changes are recommended to make clear that the proposals include land for employment use (11 ha) and reinforce the requirement for a comprehensive approach to the long term development. In particular it is recommended that further detailed consideration should be given through a Supplementary Planning Document or an Area Action Plan.

4.6 There are also a number of representations that oppose the phasing policies. The Core Strategy policies seek to reinforce development on brownfield sites within the built up area of the city first. The representations argue that to provide a range and choice of sites it is appropriate to release the green belt sites or part of them earlier. This is a matter for the inspector to consider. However, representations have also questioned the use of the term "safeguarded land" because in government guidance this refers to land not anticipated for release until at least the next plan period. It is therefore recommended to identify these locations as "Reserved Land" which will only be released when a five year supply cannot be demonstrated.

4.7 Representations have also been received that policies being carried forward from the Coventry Development Plan should be incorporated into the Core Strategy rather than continuing as saved policies for ease of future reference. Amendments are recommended accordingly to add in to the Core Strategy these policies.

4.8 Inevitably there remain areas where amendments cannot be made to satisfy those making representations. In particular many query the need for the level of growth up to 2026 in the light of the changing economic circumstances and point out that once land has been released for development it is rarely returned to greenspace. Conversely, there are also those that question whether or not the capacity for dwellings in the city has been underestimated. Phasing policies are crucial in this context and within this a recognition of the importance of monitoring to ensure that a 5 year supply of housing and employment land is retained and that brownfield sites within the city are prioritised with the Green belt sites release only being considered when the city can no longer demonstrate a five year supply of housing land.

4.9 Representations also challenge the scale of growth being proposed with again some advocating sites for development in the city and others opposing sites. In making these representations, many challenge the composition of the housing supply and in particular the inclusion of an allowance for bringing vacant homes back into use whilst others question the density assumptions and suggest that these will not be achieved. These are matters that should be considered by the Inspector although minor changes to text and policy are recommended to provide greater clarity.

4.10 Advice from GOWM has indicated that allocated sites should be capable of accommodating more than 100 dwellings and should include those sites with planning permission. Accordingly, Table 3 is recommended to be amended. However, this does not change the overall supply but rather moves the smaller sites into the Strategic Housing Land Availability Assessment (SHLAA) where they will be monitored. Adjustments to table 2 detailing the supply are recommended:

**Table 2: Components of housing supply 2006 to 2026**

Supply Category	Number of Net Dwellings
[ <del>Net Dwelling</del> ] Completions [ <del>April</del> ] 2006 to [ <del>March</del> ] 2008	2,115
Full and Outline Permissions [ <del>(April 2008)</del> ] ( <b><u>excluding allocations</u></b> )	[ <del>2560</del> ] <b><u>1,955</u></b>
Dwellings Under Construction [ <del>(April 2009)</del> ] ( <b><u>excluding allocations</u></b> )	[ <del>690</del> ] <b><u>555</u></b>
Net Capacity of Major Regeneration Schemes	6245
Strategic <b>Urban</b> Housing Allocations ( <b><u>without planning permission</u></b> )	[ <del>3,675</del> ] <b><u>3,200</u></b>
<b><u>Strategic Urban Housing Allocations (with planning permission)</u></b>	<b><u>740</u></b>
Strategic Mixed Use Allocations ( <b><u>without planning permission</u></b> )	790
Capacity of SHLAA Sites within the Urban Area	[ <del>1,470</del> ] <b><u>2,125</u></b>
City Centre Broad Location (excluding regeneration area and permissions)	3,055
Re- Use of Empty Homes	2,160
<b>Total Net Capacity within Urban Area</b>	<b>[<del>22,760</del>] <u>22,940</u></b>
<b>Green Belt land Allocations</b>	
Duggins Lane	50
Gibbet Hill	55
Hawkesbury / Sutton Stop	95
[ <del>Lentons Lane</del> ]	[ <del>460</del> ]
Cromwell Lane	390
Keresley	3,000
<b>Total Housing Supply within Coventry</b>	<b>[<del>26,510</del>] <u>26,530</u></b>

"Strategic Housing Allocations" are sites with a capacity of over 100 dwellings;

"SHLAA Sites" are identified in the City Council's Strategic Housing Land Availability Assessment 2009

4.10 Representations have been made in respect of two remaining sites at Banner Lane following the redevelopment of the former Wickmans site that at present are reserved for

employment use to be included in the housing supply as SHLAA sites. These plots have an area of 0.67 ha and 0.72 ha. In the context of the redevelopment now taking place at the adjoining former Agco site which has now been allocated for housing and the available supply of employment land with land at Browns Lane, Whitley and Peugeot coming forward, it is not considered that opposing the development of these sites for residential could be defended. Consequently it is recommended that these sites be added to the supply of residential land.

- 4.11 There are a number of objections to Policy SG2 that look to promote sustainability principles in development. Many argue that the costs of such measures is prohibitive and/or that research is ongoing. However the policy very clearly indicates that "unless it can be demonstrated on technical or economic grounds to be unachievable then" and thus no change is recommended. However representations have also been received from English Heritage that have highlighted potential conflict in respect of listed buildings and Conservation Areas. In response a minor change is recommended to add conservation to the areas where exemptions may be considered
- 4.12 There are inevitably those that challenge the level of affordable housing and advocate that it is not justified and will affect the viability of schemes particularly in the present market. No change is recommended to this policy.
- 4.13 In respect of City Centre policies, there is support for the general approach although representations have been received that challenge the need to define expansion areas to the primary retail area. This is a matter for consideration by the inspector. Your officers consider that it is necessary to demonstrate a variety of options to deliver the increase in retailing expected as part of the transformational change of the extended City Centre. Objections have also been received that challenge the focus on City Centre and contend that this will have a negative impact on other centres within the City. However, the evidence base demonstrates that the lower order hierarchy of centres is functioning well and having regard to existing commitments, it is considered at least in the first part of the plan wholly appropriate to focus on the extended city centre.
- 4.14 Objections have been received in respect of proposals for the energy from waste plant both in terms of the requirements for adjustments to green belt boundaries and its role in dealing with waste. There have also been representations in respect to the changes to green belt boundaries around schools. Again, these are matters for the Inspector.

## 5 Other specific implications

	Implications (See below)	No Implications
Best Value		
Children and Young People		
Climate Change & Sustainable Development		✓
Comparable Benchmark Data		✓
Corporate Parenting		✓
Coventry Sustainable Community Strategy		✓
Crime and Disorder		✓
Equal Opportunities		✓
Finance	✓	

	Implications (See below)	No Implications
Health and Safety		✓
Human Resources		✓
Human Rights Act		✓
Impact on Partner Organisations		✓
Information and Communications Technology		✓
Legal Implications		✓
Neighbourhood Management		✓
Property Implications		✓
Race Equality Scheme		✓
Risk Management		✓
Trade Union Consultation		✓
Voluntary Sector – The Coventry Compact		✓

#### 5.1 **Financial Implications**

- 5.2 A Programme Officer is required for the period from submission until the inspectors report is received at least 29 weeks later. A member of planning staff is being seconded to this position therefore there will be no direct impact on City Developments Revenue Budgets.
- 5.3 Additionally, the independent inspection of the Core Strategy referenced in 3.7 is a costly process, estimated at around £150k. Whilst City Development does not have the revenue budget for this cost, it will endeavour to manage the cost within its overall revenue position in 09/10. Approval is sought to proceed on this basis.
- 5.4 The Council's Local Development Scheme sets out the timetable for plan preparation. It indicates that the Core Strategy will be submitted to examination in June. It is expected that the housing, planning and delivery grant will in future years include a criteria for funding allocations based on meeting the local development scheme.

#### 6 **Monitoring**

- 6.1 The examination process proceeds along a specific timeline set by the inspectorate.

#### 7 **Timescale and expected outcomes**

- 7.1 If as intended the Core Strategy is submitted for examination at the end of June then it is likely that an Inspector's decision that would be binding on the Council

	Yes	No
<b>Key Decision</b>		√
<b>Scrutiny Consideration (if yes, which Scrutiny meeting and date)</b>	√ <b>Scrutiny Board 3 June 2006</b>	
<b>Council Consideration (if yes, date of Council meeting)</b>	no	

List of background papers

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Papers open to Public Inspection

**Description of paper**

**Location**



**SCHEDULE OF THOSE POLICIES WHERE MINOR AMENDMENTS  
RECOMMENDED**

## POLICY SG1: Development

Development proposals will be expected to demonstrate that:

- the health, safety and amenity of the users of the land and neighbouring land and the quality and enjoyment of the environment are assured;
- **ground stability and contamination issues will be appropriately remediated;**
- **wherever practicable, the specific needs of disadvantaged people are considered in order to maximise equality of opportunity;**
- green infrastructure **and the historic environment are** [is] not prejudiced;
- green infrastructure is incorporated;
- safe and convenient access is achieved;
- there is no conflict between uses;
- appropriate servicing, manoeuvring and car parking arrangements are incorporated;
- they are accessible by [~~a choice of means~~] **sustainable modes** of transport; and
- other policies of the Core Strategy are not prejudiced

## Policy SG 2: Sustainability

### Planning for Climate Change

Development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be expected in the design of buildings and site layouts to use energy, water, materials and other natural resources appropriately, efficiently and take account of the effects of climate change (both in terms of mitigation and adaptation). Unless it can be demonstrated on technical, **conservation and**/or economic viability grounds to be unachievable, then the following will be required:

- All development will [~~be expected to~~] demonstrate that it has followed best practice through:
  - use of low water volume fittings and grey water systems
  - orientation to maximise solar gain
  - high levels of insulation
  - adequate provision for separation and storage of waste for recycling; and
  - use of materials from a sustainable source in new development
- All developments must maximise the use of energy efficiency and energy conservation measures in their design, layout and orientation to reduce overall energy demand;
- All developments of more than 50 dwellings [~~are expected~~] to explore the use of

community heat and power systems.
<ul style="list-style-type: none"> <li>All developments of more than 100 units will [<del>be expected to</del>] adopt community heat and power systems</li> </ul>
<ul style="list-style-type: none"> <li>All developments of more than 10 dwellings or 1000m<sup>2</sup> floor space must incorporate on-site generation of energy from renewable sources and energy efficient design measures (including the use of district heat and power schemes where appropriate) to off-set at least 10% of predicted carbon dioxide emissions (both regulated and unregulated) from the estimated energy usage of the completed and occupied development;</li> </ul>
<ul style="list-style-type: none"> <li>All developments are [<del>expected</del>] to be carbon neutral in terms of eliminating predicted carbon emissions (both regulated and unregulated).</li> </ul>
<b>Air And Water Quality</b>
Development that would adversely affect air or water quality and water efficiency will not be permitted unless mitigation measures are possible and are fully incorporated as part of the proposal.
<b>Flood Risk</b>
Development proposals must wherever practical mitigate potential flood risk. Development will not be promoted or supported that has an adverse impact on floodplains. Development proposals must wherever practicable incorporate sustainable urban drainage facilities and techniques.
<b>Water Resources</b>
All developments should reduce mains water use and demonstrate that water conservation measures are incorporated so that predicted consumption is minimised.

### Policy SG 3: Waste Management

The City Council's waste management strategy will be supported through:

- encouraging less consumption of raw materials through the reduction and re-use of waste products;
- the allocation of waste handling sites and facilities, for the replacement of waste management facility at Bar Road;

[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 e]~~ **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

- encouragement for new methods of processing and recycling on waste management sites; and

- a requirement for development proposals to incorporate storage and collection facilities for waste recycling.

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. [~~including~~] **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.

### Policy SG4: Safeguarding Major Waste Facilities

To meet the City's long-term requirements for waste management a site is allocated for an energy from waste plant **at Bar Road.**

## **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.**

## Policy SG 6: Location and Scale of Housing Development

Housing development will be promoted in the City through:

- Strategic Regeneration Areas
- Allocated land
- Smaller sites identified in the SHLAA
- [Safeguarded] **Reserved** land

The release of land for housing development will be managed to ensure that the step change that underpins regional policy is achieved, in line with the sub regional approach.

In the first part of the plan period, unless a specific need is identified which cannot be met in any other way, residential development will be focussed on previously developed land and sites within the built-up area. Monitoring will ensure that a five-year supply of housing land suitable to meet the needs of the City can be provided and only when this cannot be achieved within the built up area of the City will [safeguarded] **reserved** land be released.

The density and mix of residential development will take into account the need to use land as intensively as is compatible with the protection of the quality, character and amenity of the area. Higher densities will be expected in and around the City Centre.

Where appropriate, existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Conversion from non residential to residential use will be supported providing a satisfactory residential environment is created

Demolition and redevelopment schemes will be considered where the stock does not meet local housing market needs

The loss of housing, especially affordable housing, will be resisted, without planned replacement at existing or higher densities.

## Policy SG 7: Provision of New Housing

In considering proposals for new residential development, it is expected that such development should provide a quality environment which assists in delivering urban regeneration and the building of sustainable communities.

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.

Developer Contributions via Community Infrastructure Levy and/or Planning Obligations may be required to address any deficiency.

The sites identified in Table 3 will be allocated for residential development.

### Policy SG 8: Release of Housing Land

Housing land will be released and phased to ensure that the delivery of new housing is broadly in accordance with the requirements of the Regional Spatial Strategy and maintains a five-year supply of housing land.

Sites within the urban area will be phased early in the plan period, with priority given to those on previously developed land. **Reserved** [~~Safeguarded~~] sites will only be released when there are insufficient sites within the urban area to meet the five-year land supply.

### Policy SG 9: Keresley Eco-suburb

The proposed urban extension at Keresley will be an exemplar Eco-suburb underpinned by extensive green infrastructure, including a new Green Belt Country Park (see Green Belt Policy EQ 2 and Proposals Map).

The Eco-suburb will have regard to the Design Guidelines for Development in Coventry's Ancient Arden and the principles outlined in the CLG Draft Planning Policy Statement for Eco Towns, providing further employment opportunities and making it easier for residents to adopt a more sustainable way of living. **A DPD will ensure that the proposed eco-suburb is comprehensively masterplanned and implemented in a co-ordinated basis.**

### Policy SG 11: Gypsy and Traveller Accommodation

Provision will be made for one transit site for Gypsies and Travellers through the re-modelling of [a] the site at Siskin Drive, Coventry.

Proposals for Gypsy and Traveller caravan sites will be assessed against the following criteria:

- a) its use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding, contamination or agricultural land quality;
- b) it should be located within reasonable travelling distance of local services and community

facilities, including a primary school;

- c) it should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;
- d) it should be served by adequate [~~mains~~] water and sewerage connections; power and waste facilities; and
- e) its use should not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated.

### Policy SG 12: Residential Density

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

- the local context;
- existing density and building characteristics;
- the highway network and access arrangements;
- requirements for open space;
- accessibility to defined local centres; [~~and~~]
- accessibility to reasonably frequent public transport services [~~routes~~];
- the impact of the amenities of occupiers of nearby properties; and
- the living conditions of future residents of the proposed development.

### Policy Area SG 13: Student Housing

Purpose-built student accommodation will be encouraged **particularly on campus and** in areas that are accessible from the universities and where such development can play a part in the regeneration of these neighbourhoods, without disadvantage to local services.

Additional numbers of student households will be discouraged in areas where there is a significant amount of new purpose-built student accommodation and where proposals would have an adverse impact on the amenities of occupiers of nearby properties and on the appearance or character of the area and threaten local services.



## Policy SG 14: Overall Economy and Employment Strategy

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 **to provide the remainder of new jobs In Coventry;** and
- Protects strategic employment sites from redevelopment to other uses; and
- Directs large scale [warehousing] **storage and distribution** development to Regional Logistics Sites, in order that efficient use is made of employment land within the City; **and**
- **Encourages the provision of employment and training initiatives, especially in developments that are easily accessible by a choice of means of transport to priority areas; and**
- **Encourages the development or expansion of hotels, conference and training accommodation in the City Centre, Major District Centres and other areas with good accessibility by a choice of means of transport.**

**An evidence based approach will be adopted when considering new employment development. This should consider market and economic data, along with social and environmental factors.**

### **Policy SG 15: Provision of Employment Land and Premises**

**To meet RSS long term aspirations existing employment sites will be protected. The RSS sets out a minimum supply of new employment land on a 5 year rolling cycle of 82 hectares that is required to be available at all times in Coventry (the “Minimum Reservoir”). This will be achieved by using recycled land and by allocating specific sites**

**A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report.**

**The sites identified in Table 4 will be allocated/reserved for employment development**  
[including mixed use]

### **Policy SG 16: Protection of best quality Employment land**

~~[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 **and premises should be accompanied by an assessment that considers:**~~

- **The physical suitability of the use of the land for employment use;**
- **A realistic assessment of the market attractiveness and viability of the site for employment purposes, irrespective of the attractiveness of the land for alternative, higher-value uses;**
- **Whether the site is or can be served through the proposed development by high quality public transport; and**
- **The potential contribution of the land to the level of employment land required over the Plan period.**

~~[will be assessed using the criteria enshrined in RSS Policy PA6B.~~

~~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.]~~

### **Policy SG 17: Mixed use redevelopment of employment land**

~~[Other than strategic sites, r] R~~edevelopment 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).

### Policy SG 17A: 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**

### Policy SG 18: [Warehousing] Storage and Distribution (B8)

Proposals for large scale storage and distribution in Coventry will not be permitted unless each of the criteria below are satisfied:

- The site is served, or capable of being served through the development, by rail freight; and
- It is essential and ancillary to an existing manufacturing or retailing operation that has its base located within the City; and
- The employment generated by the development will be at least 1 FTE per 80 square metres gross floorspace; and
- There are no appropriate sites readily available within RLS within a reasonable timescale; and
- The site is located on a primary route; and
- The site is easily accessible by [~~public transport,~~] walking and cycling **and within 400m of a bus stop with a reasonably frequent service.**

Small scale [~~warehousing~~] **storage and** distribution development will be permitted, provided all of the criteria below are satisfied:

- The site is located on a primary route; and
- The development is essential and ancillary to an existing manufacturing or retailing operation located within the City; and
- The site is easily accessible by [~~public transport,~~] walking and cycling **and within 400m of a bus stop with a reasonably frequent service;** and
- The employment generated by the development will be at least 1 FTE per 50 square metres gross floorspace.

## **Policy SG18a: Telecommunications**

**Proposals for telecommunications equipment should demonstrate that:**

- **The equipment is sited to avoid sensitive locations;**
- **The equipment is designed to minimise visual intrusion;**
- **Local amenity is not significantly adversely affected;**
- **All practicable steps have been taken to share facilities between operators; and**
- **Equipment provision does not exceed the foreseeable needs of the telecommunications operators**

**Detailed advice will be set out in a Supplementary Planning Document.**

## Policy SG 19: City Centre Strategy

The City Centre should be developed to make it a more attractive place for the City-wide community and the wider Sub-region. This means promoting, encouraging and supporting:

- high quality, legible environments and designs;
- recognition, preservation and enhancement of heritage and protection of key views of the three spires;
- vital, viable and growing shops, services, **cultural facilities** and leisure attractions;
- central employment locations;
- a variety of places to live;
- accessibility for all; and
- activities around the clock.

## Policy EQ 1: Ensuring High Quality Design

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 local and national architectural, archaeological or historic interest will also be protected.

All development will be expected to meet the following key principles:

- respond to the local physical, economic and social context, reflecting local distinctiveness and identity, including, where appropriate, the protection of important views, including key views of the three spires;
- preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
- preserve and enhance the character and setting of major road, rail and canal corridors;
- clearly define the boundaries between public and private spaces and enclosure of space;
- provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
- make places that inter-connect and are easy to move through;
- ensure they are easily understood by users, with clear routes and distinct physical features;
- seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
- be adaptable to changing climate , social, technological, economic and market conditions;
- promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
- adopt sustainable and low carbon construction principles in terms of the design, layout and density, including developing buildings which are adaptable to a variety of uses and ensure that developments maximise the use of the site;
- consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained as an integrated, multidisciplinary and continuous requirement;
- minimise adverse impact on important natural resources;
- conserve, **restore** and/or enhance biodiversity; and
- respect and enhance landscape quality **including existing hedges and trees of value.**

Supplementary Planning Documents will be prepared to promote best practice.

## Policy EQ 2: Green Belt

Inappropriate development will not be permitted in the Green Belt and the visual amenities must not be harmed by reason of siting, materials or design.

Land in the following locations will be removed from the Green Belt and protected in the interim as [~~Safeguarded Land~~ as defined in PPG2 'Green Belts'] **reserved**:

- Cromwell Lane
- **South of** Duggin's Lane
- Gibbet Hill
- Hawkesbury/Sutton Stop
- Keresley
- [~~Lenton's Lane~~]

The [~~Safeguarded L~~] **reserved** land, defined on the Proposals Map, will be required to serve local development in the long term. This land will not be released unless it is demonstrated that no more suitable sites are available within the built-up area to meet an identified need. In the intervening period, protective Green Belt policies will continue to be applied to this land and valuable landscape and wildlife features, and existing access for outdoor recreation, will continue to be protected.

As with all developments, urban extensions will be underpinned by green infrastructure to help development integrate into the landscape and facilitate significant improvements in connectivity and public access, biodiversity, landscape conservation, archaeology and recreation. Land at Keresley will form an Eco-suburb and will include an extensive Country Park, defined on the Proposals Map, to improve the quality, accessibility and long-term conservation management of the retained Green Belt and Ancient Arden landscape.

The Green Belt boundary will be realigned at the following major urban development sites:

Energy from Waste Plant, London Road

Wood End, Manor Farm and Henley Green NDC area

The Green Belt boundary will be realigned at the following schools to accommodate essential rebuilding and/or long-term expansion:

- Cardinal Newman School
- Coundon Court School
- Ernesford Grange Community School
- Finham Park Primary School
- Finham Park School
- Hollyfast Primary Schools

- Pearl Hyde Primary School
- President Kennedy School
- St Andrews Primary School
- St Peter & St Paul Primary School
- Tile Hill Wood Primary School
- Westwood Primary School
- Woodlands School

Areas where Green Belt designation is proposed:

- Coundon Wedge land north of the former Jaguar factory, Browns Lane
- Eastern Green Corridor
- Keresley Green Corridor (Prologis)
- Potters Green Corridor

### **Industrial or Commercial Buildings**

The redevelopment, extension, or other alteration of existing industrial or commercial buildings in the Green Belt for industrial or commercial uses, may be appropriate development if the overall impact of the development on the openness, appearance and character of the Green Belt is improved. A proposal will not be regarded as appropriate if:

- the area occupied by built development is enlarged;
- the height of existing buildings is exceeded;
- the use and associated activities are materially intensified;
- the total gross floorspace is significantly increased; or
- a high quality of design, materials and landscaping is not achieved.

### **Policy EQ 3: Green Infrastructure**

Development proposals will provide and [~~safeguard~~] **protect** green infrastructure based on an analysis of existing assets, informed by the Green Infrastructure Study, Green Space Strategy, including the Council's Green Space Standards, and characterisation assessments.

Development must enable the conservation, improvement and management of green infrastructure in order to complement and balance the built environment and to deliver a high quality of life, health and well-being for all. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:

Not permitting development that compromises its integrity and that of the overall green



infrastructure framework (including the Coventry/Oxford Canal);

Using developer contributions to facilitate improvements to its quality, connectivity, multi-functionality and robustness; and

Investing in enhancement and restoration where opportunities exist, and the creation of new resources where necessary, such as linking green infrastructure to other forms of infrastructure.

#### Policy Area EQ 5: Biodiversity, Geological, Landscape and Archaeological Conservation

The biodiversity and geological resources of the city, including Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), existing and provisional Local Wildlife and Geological Sites (**including SINC**s), and strategic areas of Ancient Arden, will be safeguarded and enhanced.

Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted only if the benefits of the development clearly outweigh the extent of harm likely to be caused. In such cases, developers will be required to reduce, offset or compensate for such harm to the fullest practicable extent, with all decisions based on sound analysis.

Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure.

Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved.

Identified important landscape features, including Historic Environment assets, **trees protected by preservation orders, ancient woodland**, and archaeological remains of value to the locality, will be protected against unnecessary loss or damage and **in the case of archaeological remains** all practical measures must be taken for their assessment and recording.

## Policy SC 2: Shops Outside Centres

Outside the network of Centres:

- any proposal for new floorspace over 200m<sup>2</sup> gross will be expected to demonstrate that:
  - the development would not put at risk the policies of the Core Strategy;
  - the impact of the proposed development [en] **would not be harmful to** the vitality and viability of existing centres [~~would not be harmful~~]
  - the development could not be accommodated in an existing centre of appropriate scale
  - the likely effect of public or private sector investment needed to safeguard the vitality and viability of existing centres
- any proposal relating to local shops below 200m<sup>2</sup> gross will be permitted provided that a need for the proposal is identified and that a sequential approach to location has been followed;
- proposals for uses within Use Classes A3, A4 and A5 will normally be resisted except in employment areas.

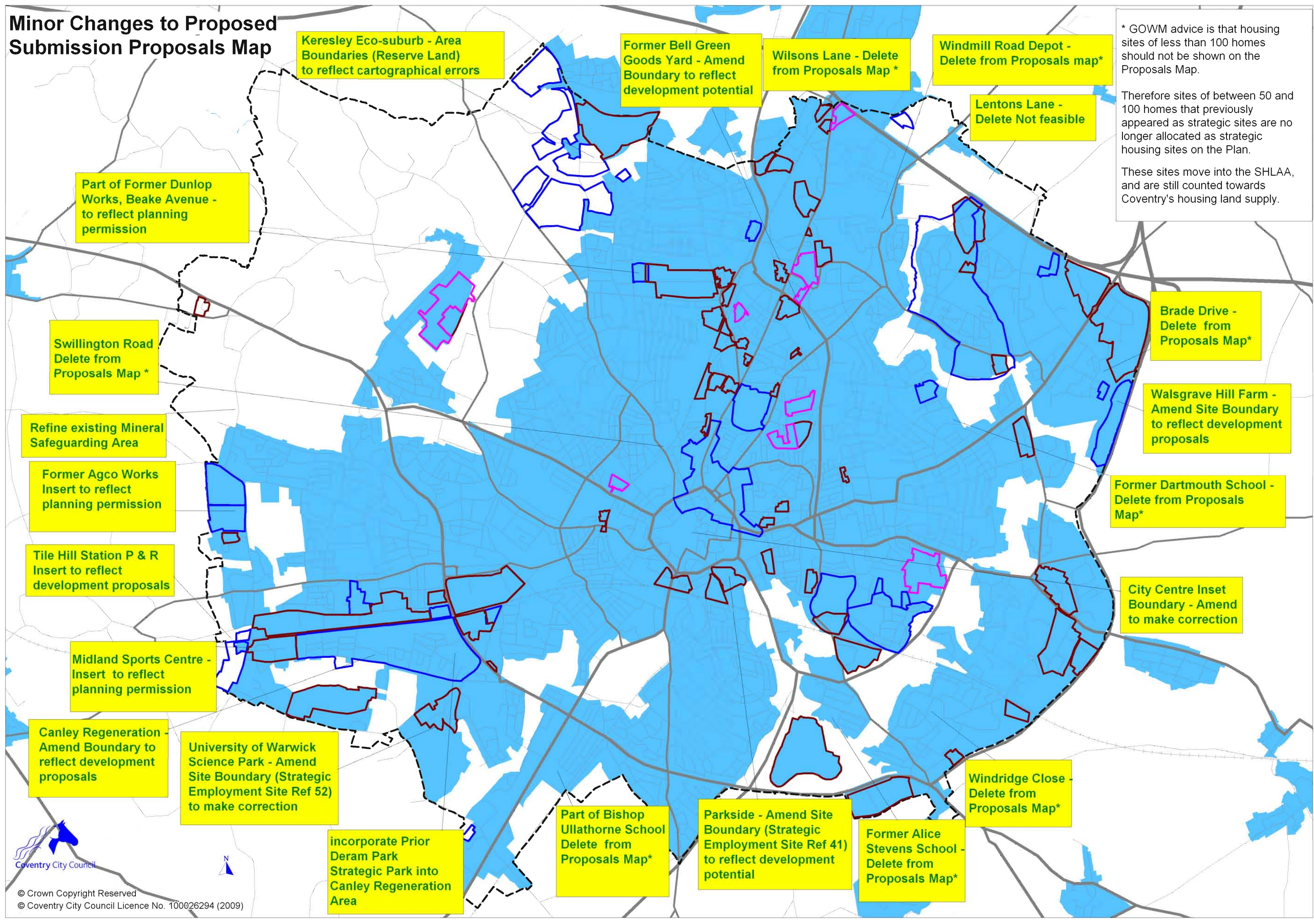
## Policy SC 3: Local Community Facilities

Community facilities that serve local needs should be located within or immediately adjacent to a defined Centre. Where this is not possible, a location easily accessible to the local community by walking, cycling or public transport will be acceptable.

Development proposals that would result in the loss of sites and premises **and/or facilities** currently or last used for the provision of community facilities or services will be resisted. Their loss will only be accepted if:

- it can be demonstrated that the community use is no longer needed; or
- the type and level of provision is relocated within around 1km; or
- the development proposes the enhancement of existing community facilities within around 0.5km.

# Minor Changes to Proposed Submission Proposals Map



**Keresley Eco-suburb - Area Boundaries (Reserve Land) to reflect cartographical errors**

**Former Bell Green Goods Yard - Amend Boundary to reflect development potential**

**Wilsons Lane - Delete from Proposals Map \***

**Windmill Road Depot - Delete from Proposals map\***

**Lentons Lane - Delete Not feasible**

**Part of Former Dunlop Works, Beake Avenue - to reflect planning permission**

**Swillington Road Delete from Proposals Map \***

**Refine existing Mineral Safeguarding Area**

**Former Agco Works Insert to reflect planning permission**

**Tile Hill Station P & R Insert to reflect development proposals**

**Midland Sports Centre - Insert to reflect planning permission**

**Canley Regeneration - Amend Boundary to reflect development proposals**

**University of Warwick Science Park - Amend Site Boundary (Strategic Employment Site Ref 52) to make correction**

**incorporate Prior Deram Park Strategic Park into Canley Regeneration Area**

**Part of Bishop Ullathorne School Delete from Proposals Map\***

**Parkside - Amend Site Boundary (Strategic Employment Site Ref 41) to reflect development potential**

**Former Alice Stevens School - Delete from Proposals Map\***

**Windridge Close - Delete from Proposals Map\***

**Brade Drive - Delete from Proposals Map\***

**Walsgrave Hill Farm - Amend Site Boundary to reflect development proposals**

**Former Dartmouth School - Delete from Proposals Map\***

**City Centre Inset Boundary - Amend to make correction**

\* GOWM advice is that housing sites of less than 100 homes should not be shown on the Proposals Map.

Therefore sites of between 50 and 100 homes that previously appeared as strategic sites are no longer allocated as strategic housing sites on the Plan.

These sites move into the SHLAA, and are still counted towards Coventry's housing land supply.