



Report to Coventry City Council

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE COVENTRY CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 30 June 2009

Examination hearings held between 10 November and 4 December 2009

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1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document,
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Coventry Core Strategy DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act. I am satisfied that the DPD meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted Core Strategy (CS) against the criteria set out in paragraphs 4.51- 4.52 of PPS 12. In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan.
- 1.3 My report firstly considers the legal requirements and then deals with the relevant matters and issues considered during the examination in terms of testing justification, effectiveness and consistency with national policy. My overall conclusion is that the Core Strategy is sound, provided it is changed in the ways specified. The principal changes which are required are, in summary, in relation to:
 - a) New Housing and Employment Site Allocations,
 - b) Phasing of New Housing Land Supply,
 - c) Deleting the Allowance for Re-Use of Empty Homes and
 - d) Designating New Areas of Green Belt.
- 1.4 The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the legal requirements and/or the PPS 12 criteria. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.5 At my request, the Council produced a revised version of the submitted document incorporating firstly, all of their minor editorial changes to the original text (CS0.2B), secondly, their proposed focussed changes/points of clarification (CS0.2C), and thirdly, the further proposed changes (FPCs) (CS0.2D) also suggested by the Council during the hearings, all of which have been made public and open to comment as part of the examination.

- 1.6 My report therefore sets out all the detailed changes required in addition to those included in the Council's revised version of the CS text (See Annex 2) in its recommendations. This includes a limited number of minor alterations, additions and deletions of my own to the Council's proposed changes, following public consultation and in response to representations received as well as those arising from the debates at the examination hearings to provide effectiveness, clarity and consistency throughout the document (see Section 4). Therefore, unless specifically stated otherwise in this report, I endorse the Council's proposed changes. Together with my own recommendations, they will ensure that the plan is sound.

2 Legal Requirements

- 2.1 The Coventry Core Strategy DPD is contained within the Council's Local Development Scheme (LDS) (CS10), the updated version being approved in March 2009. There it is shown as having a submission date of June 2009, which was just achieved. I also consider that the content of the CS is as envisaged in the LDS and consistent with the Council's Sustainable Community Strategy 2008 (SCS) (CS/S3.1).
- 2.2 The Council's Statement of Community Involvement (SCI) (CS0.5) has been found sound by the Secretary of State and was formally adopted by the Council before the examination hearings took place. It is evident from the documents submitted by the Council, including the Regulation 30(d) and 30(e) Statements and its Self Assessment Paper, that the Council has met the requirements as set out in the Regulations. This matter is addressed in greater detail later in this report under Matter 1 (Issue 4).
- 2.3 Alongside the preparation of the DPD it is clear that the Council has carried out a parallel process of sustainability appraisal (SA) and the final SA report (CS0.4) was submitted with the DPD. This requirement has therefore been satisfied. Criticisms of the adequacy of the SA in relation to particular sites and policies of the CS are more appropriately dealt with when considering the justification, consistency and effectiveness tests (see Section 3).
- 2.4 In accordance with the Habitats Directive, I am content that a suitably comprehensive screening process has been undertaken to confirm that an Appropriate Assessment is not required for this CS. Accordingly, there would be no significant harm to the conservation of any international sites of nature conservation importance (SAC, SPA, Ramsar) as a result of the policies and proposals in this DPD.
- 2.5 I am also satisfied that the DPD has had regard to national policy. The West Midlands Regional Assembly has indicated that the DPD is in general conformity with the emerging Regional Spatial Strategy (RSS) (West Midlands Regional Spatial Strategy Phase II Review) and I agree.
- 2.6 I am content that the DPD has had regard to the SCS for the area and complies with the specific requirements of the 2004 Regulations (as amended), including those in relation to publication of the prescribed documents; their availability for inspection and local advertisement; notification of DPD bodies and provision of a list of superseded/saved policies. Accordingly, I conclude that all the relevant legal requirements have been met.

3 Justified; Effective and Consistent with National Policy

Introduction [Chapter 1]

- 3.1 This chapter provides a satisfactory introduction to the CS. Throughout the examination I have taken into account that the Council is making good progress with a City Centre Area Action Plan (CCAAP), as referred to in para 1.8. However, the text of paras 1.4 to 1.9 inclusive will no longer be relevant in the adopted version of the CS and should therefore be deleted for clarity and brevity.

Preparing the Core Strategy [Chapter 2]

- 3.2 Taking into account the Council's post submission proposed editorial corrections and focussed changes (CS0.2B and CS0.2C), I am satisfied that, save for the detailed wording of paras 2.8 and 2.9 that requires updating, the remainder of this chapter is sound and satisfactorily clear in its explanation of the preparation process of the CS. The following minor amendments are necessary for clarity. In para 2.8 in the second sentence replace "Revision Draft (The Preferred Option) cannot" with "Review could not". In para 2.9 delete "Emerging" (twice) and replace "covered" with "covers" in the first sentence.

Policy Context [Chapter 3]

- 3.3 In addition to the Council's proposed changes to the text of this chapter, it is also necessary to confirm the new housing figures for the city from the RSS at the end of para 3.5, rather than the region or sub region. Therefore, in para 3.5 replace the last sentence with "The RSS focuses development in the Major Urban Areas, including Coventry, and states that 33,500 net additional households should be accommodated within and adjacent to the city between 2006 and 2026.".
- 3.4 Moreover, the content of paras 3.6 – 3.8 inclusive has now been overtaken by events and should be deleted for clarity. In para 3.12, line 1, "Preferred Option" should also be deleted. Otherwise, I am satisfied that the remaining text of this chapter is sound and sufficiently clear in setting out the current policy context for the CS, although I also endorse the Council's revised version of Map 1 (Sub Regional Strategy) in colour and thus clearer for readers.

Recommendations

The following changes are required to make this part of the CS sound: - (in addition to the Council's FPCs) -

Delete paras 1.8 and 1.9.

Para 2.8 - in the second sentence replace “Revision Draft (The Preferred Option) cannot” with “Review could not”.

Para 2.9 - delete “Emerging” (twice) and replace “covered” with “covers” in the first sentence.

Para 3.5 - replace the last sentence with “The RSS focuses development in the Major Urban Areas, including Coventry, and states that 33,500 net additional households should be accommodated within and adjacent to the city between 2006 and 2026.”.

Delete paras 3.6 – 3.8 inclusive.

Include new version of Map1 in colour.

Para 3.12 – delete “Preferred Option” in line 1.

Matter 1 - Strategic Vision and Objectives [Chapter 4]

Issue 1 – Does the CS provide an appropriate spatial vision for the future of the city over the plan period, consistent with national guidance in PPS 12, the Regional Spatial Strategy [RSS] and the Sustainable Community Strategy [SCS] ?

- 3.5 There is no doubt that the overall levels of development for the city and its environs in the CS are consistent with those of the RSS and are endorsed by the WMRA on that basis. Moreover, the overall sub regional strategy of redistributing growth so as to maximise urban regeneration along a north/south corridor with Coventry at its centre is also consistent with national guidance, such as PPS 1, PPS 3 and PPS 12. At the regional level it is also clearly and specifically endorsed by the RSS Panel Report (Sep 2009) and consistent with the policies of the SCS (CS/S3.1).
- 3.6 In my judgement the Council's strategic choice to expand the city through urban extensions primarily along a north-south axis and with a priority to investment in public transport and regeneration, especially of the city centre, should help to create a more focussed, rather than dispersed, and thus more sustainable pattern of development. Moreover, it should also assist the city in reaching the necessary critical mass to operate as a fully functional sub regional service centre, including through city centre expansion, and therefore as an important new growth point for the region as a whole as anticipated in the RSS.
- 3.7 The additions to the wording of the 10 objectives in the Council's FPCs (CS0.2C and CS0.2D) include important cross references to the relevant delivery policies of the CS. In particular, I endorse the new objectives to refer to the economic contribution of the two universities (theme 1), general support for further/higher education establishments (theme 5) and the city's heritage and green infrastructure network (theme 10) as useful in helping to define the strategic vision.
- 3.8 Importantly, the objectives now set out are consistent with relevant national guidance, without repeating it, and clearly derive from specific elements of both the RSS and SCS (CS/S3.1). Accordingly, I am satisfied that, as amended, they are soundly based and I consider that their content provides an appropriate and realistic spatial vision for the city to 2026.

Matter 1 continued - Spatial Strategy [Chapter 5]

Issue 2 – Will the strategy satisfactorily and sustainably deliver the new development needed to meet the city's share of growth in the West Midlands, including through the allocation of a number of strategic sites ?

- 3.9 As an employment led strategy the Council's primary focus on the regeneration of an enlarged city centre, where around half of the new jobs sought are expected to be provided, is both logical and essential if the necessary new investment (both private and public) is to be secured. From everything that I have read, heard and seen, I also have no doubt that this primary focus is also very important to address the city's present relatively poor image overall and its economic performance as a sub regional shopping and service centre in particular.
- 3.10 I see no need for the CS to refer directly and specifically to the recent recession as it is a plan for a twenty year period during which time numerous turns of the economic cycle may reasonably be expected, based on previous experience. Together with the emerging CCAAP, I consider that the positive policies and practical proposals in the CS should help deliver the required growth over the plan period, sustainably focussed firstly, on the city centre and regeneration areas and secondly, on the remainder of the existing built up area of the city. In accord with national guidance, this rightly involves priority being given to the re-use of previously developed land (PDL) in the first instance, including by the "recycling" of strategic employment sites that will not normally be released for alternative uses, such as housing.
- 3.11 Nevertheless, it is equally clear to me that not all of the scale of growth identified for the city to 2026 in the RSS can be met within the existing built up area of the city, let alone just the city centre and/or the priority regeneration areas. Understandably, this element of the spatial strategy is inherently controversial as it is likely to require new development on greenfield sites on the edge of the existing built up area, both within and outside the city boundary, albeit in the longer rather than shorter term.
- 3.12 Notwithstanding the considerable level of local residents' objections to this part of the strategy, on the evidence before me I am satisfied that, in principle, the identification of additional strategic development sites, especially for new housing, is essential if the city's share of growth identified in the RSS is to be met over the plan period. Without such allocations the availability of suitable PDL sites and buildings within the city will not be sufficient in total, as evidenced in the SHLAA (CS/S6.5) and other relevant studies.
- 3.13 In addition to the Council's proposed changes, there are two further matters of clarification that need to be addressed in the spatial strategy section of the CS. Firstly, at the start of para 5.6 (the

second, as there are two paras 5.6 in the original CS document) there is no definition of “first part of the plan period”. It is therefore not clear over what timescale priority will be given to the use of PDL nor when new greenfield sites might need to be released. Taking into account my recommendations elsewhere in this report, the strategy would be clearer for all concerned if it stated: “Priority for the first half of the plan period at least will be given to ...” and I so recommend. This should also help to confirm that new development outside the city boundary should only need to come forward in the second half of the plan period.

- 3.14 Secondly, in para 5.10, I see no necessity to be specific about the percentage of new jobs expected to be provided at the two local universities and university hospital. The Council has only limited influence over their growth in practice, as it depends largely on national public sector funding. And, as I heard at the examination, the recent economic recession seems likely to lead to delays, at best, in the implementation of previous expansion plans, if not actual short term job losses at both universities, due to public sector spending cuts over the next few years at least.
- 3.15 In such circumstances, which would not have been fully apparent when the published CS was first drafted, I recommend that the second sentence of para 5.10 be reworded to start as follows: “Further employment provision over the plan period is expected to result ... “. The third sentence should then start as follows: “The remainder is expected to be ...”.
- 3.16 I also endorse the Council's proposed changes to amend and move para 5.18 to follow para 5.11 (and renumber accordingly) and to update the housing figures in paras 5.12, which will now need to reflect the latest position in the light of my other recommendations. Para 5.25 also needs to be updated in the light of the new CIL Regulations (April 2010). With these minor changes, I am satisfied that the spatial strategy would be sound, in principle.
- 3.17 I deal with the relevant issues surrounding the identification, availability, sustainability and delivery of specific strategic sites around the city in later sections of this report. However, overall, I conclude on this issue that, as amended, the spatial strategy of the CS is capable, in principle, of satisfactorily and sustainably delivering the necessary growth to 2026 arising from the RSS requirements.

Issue 3 – Are there any objectives, policies or proposals that are not consistent with national guidance and/or regional policies and, if so, is there a local justification supported by a robust and credible evidence base ?

- 3.18 As referred to above, I have concluded that there is no apparent inconsistency arising from the objectives of the CS with either the relevant national guidance (e.g. PPS 1, PPS 3, PPS12) or the RSS

and its policies that requires a particular local justification in order to be sound. Nonetheless, the Council acknowledges that there are minor differences of emphasis in two particular policies.

- 3.19 Firstly, policy EQ2, relating to the redevelopment of existing industrial and commercial buildings in the Green Belt (GB), sets out particular criteria that differ slightly from those that might apply under a more specific application of national guidance in PPG 2. Although the explanation given in para 7.22 of the text is brief, it is clear and derives directly from the existing equivalent policy in the Coventry Development Plan (CDP) (CS9). This was accepted as justified by local circumstances by the Inspector who held the inquiry into objections to that plan.
- 3.20 In the absence of any evidence to the contrary, I am content that these particular local circumstances continue to justify the slightly different policy approach, particularly as it seems likely to operate in practice in a similar way to that applicable if these sites were considered to be "Major Developed Sites" within the GB, as referred to in Annex C of PPG 2. Accordingly, I consider this part of the policy to be sound in this respect.
- 3.21 In relation to policy SC1 and as set out above, I am also entirely satisfied of the vital local importance of securing redevelopment and reinvestment in the city centre over the plan period. This makes it imperative that other lower order centres, including the two (remaining) Major District Centres (MDC) are not permitted to expand to the extent that they provide unnecessary competition for comparison retail trade in relation to the city centre.
- 3.22 Consequently, I consider that those elements of policy SC1 (and SC2) that impose limits on the growth potential of the remainder of the city's retail hierarchy of centres (and no significant expansion beyond existing commitments in the plan period) are entirely justified by the current local situation. Moreover, I further consider that these are also fully consistent with the most up to date guidance in new PPS 4, notably policies EC3 and EC4 thereof, as well as PPS 6 which was extant when the policies were drafted.
- 3.23 I deal with the discrepancy between national guidance in PPG 2 and the formal designation of land within the built up area of the city as GB, known locally as Green Wedges (GW), in relation to policy EQ2 itself, later in this report.

Issue 4 – Is there a clear "audit trail" demonstrating how and why the preferred strategy was selected, including in terms of consultation with the public, representative bodies, service and infrastructure providers and other interested parties ?

- 3.24 I refer in para 2.2 above to the fact that the Council has complied with their own SCI in terms of consultation during the preparation of the CS and met the legal requirements set out in the relevant

Regulations. Nonetheless, there was considerable criticism throughout the hearing sessions and in written submissions of the effectiveness of public engagement in the process and on the progress of the CS towards submission, notably from residents of the areas to which new development would be directed.

- 3.25 For my part, I have no doubt that matters have been complicated and feelings of confusion intensified, particularly for individual members of the public, by the almost parallel consultation procedures undertaken in relation to the RSS Phase II Review. Nevertheless, looking at the CS alone, the evidence base makes it clear that it has been the subject of wide ranging consultation, including with the general public as required at each relevant stage, starting with the initial Issues and Options Report in May 2006.
- 3.26 With the benefit of hindsight, it may well be that the Council would choose to employ some different methods and approaches to better and more directly engage residents of the city and its environs at an earlier stage in other public consultations. Indeed, at the hearings, my attention was drawn to the extensive and apparently productive exercises of public involvement undertaken in earlier development plan preparation work in the city during the 1970s.
- 3.27 However, it is neither required nor necessary that each local resident be notified directly and individually of each stage of CS preparation, as might be the case for a specific planning application. Overall, it remains the case that the Council has met all the necessary legal and procedural requirements in bringing forward the CS, including in terms of public consultation at each relevant stage when choices needed to be made, in accordance with the adopted SCI, which was itself the subject of relevant consultation and a testing/approval process.
- 3.28 In addition to a “timeline” relating to CS preparation, the Council has also provided evidence of a thorough and ongoing engagement with infrastructure providers, as well as other relevant public and private bodies and organisations. It has also commissioned various important technical studies and reports at appropriate stages to inform the strategic choices made, notably in relation to the GB.
- 3.29 Almost inevitably in a major city comprising a fairly densely built up area surrounded by countryside largely designated as GB, practical strategic spatial options are limited. Notwithstanding, I am also satisfied that the Council has, at various stages and subject to SA, examined reasonable and realistic options impartially before settling on a preferred strategy as now reflected in the CS. Moreover, the selected strategy essentially coincides with that endorsed on a number of occasions by the relevant sub-regional forum of democratically elected local authorities as part of a joint input to the RSS Phase II Review.

- 3.30 To my mind, this reinforces, rather than undermines, the validity of the CS as having been the subject of relevant inputs at appropriate stages from other stakeholders, rather than deriving from the Council's own aspirations alone. Accordingly, I do not agree with those who have suggested that the CS itself, or any of its policies and/or proposals, is necessarily unsound due to an inadequate or incomplete consultation process.

Issue 5 – Has the CS been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA], strategic environmental assessment [SEA] and an appropriate assessment [AA] ?

- 3.31 On the evidence available, I am satisfied that the Council's Sustainability Appraisal/Strategic Environmental Assessment Report (SA/SEA) (CS0.4) has been carried out on a comprehensive basis without material omissions, subject to independent scrutiny and with an appropriate methodology. This includes in respect of the examination of reasonable alternative options, given the constraints imposed in a tightly defined and relatively densely built up urban area essentially surrounded by GB, and in terms of site allocations, throughout the gestation period of the CS.
- 3.32 Accordingly, I conclude that the national guidance in paras 4.39 to 4.43 of PPS 12 and paras 1.1 to 1.13 of Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM – 2005) has been complied with. This takes into account that an Appropriate Assessment (AA) under the Habitats Directive in respect of potential effects on international nature conservation sites (SAC, SPA and Ramsar) has not been deemed necessary in this instance following the initial screening process and as agreed by Natural England.
- 3.33 The SA/SEA is consistent with that carried out for the RSS Phase II Review recently endorsed in the Panel Report (Sep 2009) and I see no reason to differ from their overall conclusions in this regard. Taking into account the Council's post submission proposed changes to the CS, I am therefore content that it has been subjected to a suitably comprehensive and satisfactory SA/SEA process throughout and also that an AA was not necessary.
- 3.34 In addition, I am also satisfied that each of the additional sites put forward by representors as potential new or alternative strategic land allocations has been the subject of a satisfactory SA process, including public consultation, as required. This has enabled their consideration as part of the examination and I report accordingly.

Recommendations

The following changes are required to make this part of the CS sound: - (in addition to the Council's FPCs) –

Para 5.6 (second one in original CS) – Renumber as 5.7 (and all subsequent paragraphs in this chapter) and replace “part” with “half” and add “at least” after “period”, both in first sentence.

Para 5.10 – start second sentence “Further employment provision over the plan period is expected to” (result from the growth...) and third sentence “The remainder is expected to be (provided for...).

Para 5.12 – update housing figures and penultimate sentence in accordance with other Recommendations in this report - first sentence – “22,600” and third sentence – “10,900”.

Para 5.12 - final sentence to read as follows: “a further approximately 3,900 dwellings are proposed in an eco suburb at Keresley and other Green Belt reservations”.

Para 5.25 – delete second sentence and in third sentence replace “are encouraged to continue to advance their infrastructure planning in order to” with “should”.

Matter 2 - Employment [Policies SG14 – SG18]

Issue 6 – Are the policies and proposals concerning the local economy and employment consistent with national guidance [including PPS 4] and the relevant regional policies ?

- 3.35 It is essentially common ground that the CS follows the Regional Economic Strategy and the RSS in broad terms. Moreover, the designations of both the Coventry and Nuneaton Regeneration Zone and the Coventry/Solihull/Warwickshire High Technology Corridor provide clear evidence of regional strategic investment priorities relating to the city to help meet local employment needs.
- 3.36 I note that there has been an annual increase in local jobs between 1993 and 2006 averaging around 2,000, albeit that it has been below 1,000 in the later part of that period from 1998 (CS/S6.18). The significant recent expansion of both local universities and the university hospital, with the University of Warwick in particular acting as a catalyst for growth, also indicates that there are reasonable prospects of new job creation from those sources resuming in the longer term beyond the recent recession, if not on the scale originally envisaged in the CS (see also Issue 14 below).
- 3.37 Taking into account the regional investment priorities applying to the city, including the important rail improvements planned under the NUCKLE scheme, as well as the area's recent industrial heritage, including workforce skills in high added value engineering, I share the Council's optimism that the ambitious aspirations for employment growth over the plan period can be achieved.
- 3.38 I am also satisfied that by adopting the "minimum reservoir" approach deriving directly from the RSS and retaining strategic employment sites the Council, through the CS and other related initiatives, including the CCAAP, should be able to ensure that a good range of size and type of land and buildings is available at all times across the city. In my judgement, this employment strategy would be entirely consistent with the overall objectives of new PPS 4 and policy EC2 thereof in particular in terms of planning for sustainable economic growth. I also consider that such an approach embraces the necessary flexibility, including in respect of the wider definition of employment uses.

Issue 7 – Will the policies and proposals deliver the levels of new employment sought or, if not, what else needs to be done and/or should more or less land be identified, for example by allocating new greenfield sites or removing areas from the GB ?

- 3.39 Notwithstanding the use of the "minimum reservoir" approach, which, in common with the RSS Panel Report (Sep 2009), I endorse above as consistent with national and regional policies, there is clear evidence in the AMR 2009 (CS29) that significantly more land than the minimum 82 ha requirement is actually available in and

around the city at present. Taking into account the CS allocations, there is also more than sufficient to meet the RSS 10 year employment land supply requirement. Indeed, of the RSS “indicative long term requirement” of a total of 246 ha of employment land up to 2026, which the Coventry's Economy 1976-2026 report (CS/S6.18) confirms as “of the right order”, about 90% can already be identified. This is without any further greenfield and/or GB employment land releases within or adjacent to the city.

- 3.40 It may also reasonably be assumed that the additional anticipated turnover or “churn” of existing employment sites is likely to, at least, contribute to reducing any potential longer term shortfall over time. Consequently, additional sites seem only likely to be required if all that land in the 2009 AMR is developed (or permissions lapse), none of the CS allocations comes forward and no further windfall or “churn” sites emerge before 2021.
- 3.41 Some respondents suggest that more existing employment land in and around the city should be released for new housing, so as to reduce the need for GB land losses. However, as a job led strategy, I am satisfied that retaining a wide ranging and healthy local supply of employment sites to facilitate new investment and in specific accordance with the RSS is vital to the delivery of the overall economic objectives for the City. It therefore has to take priority, in principle, in such circumstances, even where redevelopment for new housing might be equally sustainable in general terms. Nevertheless, I do also recognise that there is a case for a more flexible application of policy SG17 (see Issue 12 below) and that this should make a meaningful contribution to new housing numbers across the city over the plan period.
- 3.42 In the light of the above, I consider that the policies and proposals in the CS, as augmented by targeted regional investments such as NUCKLE and other initiatives, including the CCAAP, provide a suitable strategic platform to help deliver the levels of new employment sought in the city over the plan period. Moreover, I am satisfied that this can be achieved without the need for any additional employment land allocations, including GB releases, at present. Accordingly, I conclude that the Council's strategy relating to the economy and employment is sound, albeit a few small changes and minor amendments are needed as set out below.

Issue 8 – Should the CS identify a Major Investment Site [MIS] and/or a Regional Logistics Site [RLS] ?

- 3.43 The RSS does not specifically promote the regional designation of either an additional Major Investment Site (MIS) (50+ ha) or Regional Logistics Site (RLS) (50+ ha) in Coventry for the plan period. However, it does indicate that a new Regional Investment Site (25-50 ha) (RIS), in addition to Ansty, will be required in the wider Coventry and Nuneaton Regeneration Zone. Given the relevant designation criteria, I agree with the Council that there are

no suitable sites, including Whitmore Park which is already identified as a SES in the CS, remaining within the city at present.

- 3.44 Consequently, any such regional designation can only be a matter for future joint exploration with Nuneaton and Bedworth Council, amongst others, as things stand, and not an allocation in this CS. There is therefore no need to change the document in this respect as the references to regional policy guidance in the panel on p.54 provide sufficient information.

Issue 9 – Should more [or less] cross border employment land be identified over and above the Peugeot/Ryton site ?

- 3.45 The RSS confirms that the ongoing redevelopment of the former Peugeot site at Ryton on Dunsmore, just outside the city in Rugby district, is deemed to be part of the employment land supply for Coventry. It therefore counts towards the 82 ha “minimum reservoir” figure. The emerging Rugby CS (Proposed Submission Draft – June 2009) also adopts a consistent approach regarding the site. As noted in the 2009 AMR (CS29) the total supply of land available for employment in and relating to the city comfortably exceeds the “minimum reservoir” requirement at present. Thus, there is no current need to allocate any additional employment land outside the city boundary, over and above that available at Ryton, to meet the overall economic objectives of the CS.
- 3.46 Nevertheless, as paragraph 6.72 of the CS makes clear, there may be a need in the longer term if and when the “minimum reservoir” can no longer meet the strategic requirement. However, for clarity, the words “an unspecified amount of” should be deleted from point 3 under Regional Policy Guidance in Existing Guidance on p.54 of the CS as the details of any future redevelopment at Ryton are a matter for the Rugby CS or other DPD to address.

Issue 10 – Should the contribution of employment opportunities at Coventry Airport be acknowledged in the CS ?

- 3.47 The airport performs an important role, particularly for freight (including mail) and business aviation, which benefits the overall economy of the city and is seen as an advantage by inward investors. However, it is within Warwick District, surrounded by the GB and with little land remaining on site for related employment growth. As I understand it, there are also road access constraints on further growth at present. In such circumstances, there is no need or requirement for the existing employment provision there to be specifically acknowledged in the CS. Nor can it be considered as a reasonable alternative to those sites identified as a location for new employment development in the CS for the same reasons.

Issue 11 – Is the employment allocation at Keresley justified by the available evidence ?

- 3.48 My conclusions relating to Keresley and the proposed eco suburb are dealt with in Matter 8A. Notwithstanding, I am entirely satisfied that, in the interests of sustainability and the overall economy of the locality and the city as a whole, any development on such a scale should include suitable new employment provision within or nearby. I am equally satisfied that an objective of providing approximately one sustainably located job per new dwelling is desirable to help facilitate social cohesion and community development, as well as for environmental reasons, if development proceeds. Moreover, I see no reason why it should not be achievable over the plan period as part of a comprehensive scheme.
- 3.49 Based on the Council's calculations set out in CS/SG18, I agree that provision for around 3,600 new jobs requires that at least 11 ha of land be provided as part of any overall scheme. For the above reasons I therefore endorse the Council's proposed change to add "Keresley – 11 ha" to both Table 4 and Map 4 of the CS.

Issue 12 – Is it appropriate in principle and reasonable in practice to seek to safeguard so many Strategic Employment Sites [SES] and/or should more flexible criteria [such as in relation to economic viability and the percentage of residential development] be used to help make the most effective use of previously developed land ?

- 3.50 Bearing in mind that the overall strategy for the city is jobs led, I am entirely satisfied from the evidence that it is appropriate in principle and necessary in practice for the Council to identify Strategic Employment Sites (SES) intended to remain in that use over the plan period. In principle, I have no doubt that this restriction is essential to the achievement of a mixed and balanced portfolio of size and type of employment sites in and around the city, as part of a positive economic strategy. However, policy SG15 needs to refer to "retained", rather than "protected", in the first line for it to be clear what is intended and effective in practice.
- 3.51 Importantly, now that the Council proposes the deletion of the original first four words of policy SG17, designation as a SES does not imply that any redevelopment has to be exclusively for employment uses. Mixed uses, including residential, are not ruled out providing that they are compatible. Also, policy SG17 specifically provides for the overall economic viability of redevelopment schemes to be taken into account, alongside all other relevant material considerations. Therefore, in general terms, I consider this approach to be reasonable and realistic, as well as consistent with national guidance, including new PPS 4.
- 3.52 However, the last two sentences of this policy provide important criteria that would also have to be met and both have been criticised by respondents as too prescriptive and inflexible. In particular, although the Council terms it an "indication", by virtue of the inclusion of the word "normally", others see the "no more than

20% residential" element of the policy as an unrealistic constraint that may well prevent some sites from coming forward for redevelopment at all, especially in the present economic climate.

- 3.53 The Council's figure apparently derives largely from the successful redevelopment scheme, recently underway, on the Jaguar site at Browns Lane. However, my attention has been drawn to other recent examples (e.g. New Century Park) of sites closer to the city centre where higher percentages of residential development have recently been agreed in revised schemes, including where those originally set proved uneconomic to implement.
- 3.54 In such circumstances it seems to me that imposing an essentially arbitrary upper limit on the residential element of a mixed use based on the experience of just one scheme is unlikely to help bring other redevelopment projects forward. Instead, it risks sites continuing to lie vacant to no-one's benefit, least of all the economic interests of the city as a whole. I appreciate that the use of the word "normally" allows for an exception to be considered by the Council but, on balance, take the view that it is preferable for any residential element of redevelopment schemes to be considered on its own merits in relation to each specific proposal. The fact that a site's principal designation in the CS is as a SES should alone ensure that the Council can reasonably resist pressures to permit schemes that fail to retain the majority of it in employment uses.
- 3.55 The last sentence of policy SG17 says that "planning obligations will require jobs to remain within the Coventry TTWA" but I see no specific local justification for this rather onerous requirement, despite the general importance of providing new jobs in the city over the plan period to meet the overall strategy. More specifically, I am unconvinced that it is reasonable in principle, even on sustainability grounds, for the Council to attempt to influence the private sector jobs market in this way or, more importantly, how such a restriction could actually operate in practice once the development had been completed.
- 3.56 Short of monitoring the details of every person employed there over time, which might well be termed an unnecessary expenditure of public resources, I am not persuaded that it could be enforced, even if agreed initially. The Council has provided no evidence of similar implementation to date and there is no explanation or justification in the supporting text of the CS. Therefore I deem it to be inconsistent with national guidance in PPS 4 and unnecessary. Accordingly, the last two sentences of policy SG17 need to be omitted for it to be sound.

Issue 13 – Is the definition of a SES [a threshold of 50 jobs] appropriate and realistic in all the relevant local circumstances ?

- 3.57 Some respondents have questioned the validity of defining strategic employment sites as all those currently providing 50 or more jobs.

I can understand the concerns expressed as the actual number of jobs available on any one site can vary considerably over time and does not necessarily reflect the overall economic contribution of the relevant enterprise(s) to the city as a whole. Moreover, in most other contexts, 50 jobs would normally be seen as a very low threshold for the definition of a truly “strategic” site. Indeed, similar and entirely understandable concerns have also been raised about the number of relatively small new housing sites that the Council has chosen to consider as “strategic” in this particular CS.

- 3.58 Nevertheless, as the Council points out, 50 employees is a nationally acknowledged upper threshold for the definition of a small business. It is also a suitable proxy for the exclusion of small employment sites in practice. Moreover, in a spatial planning context, the loss of a site (or building) practically capable of providing at least that number of jobs to a non-employment use (or uses) might reasonably be considered as a strategic issue, in the sense that it could materially undermine or compromise the overall economic objectives of the CS, especially on a cumulative basis.
- 3.59 Accordingly, given the local strategic importance of retaining a “balanced portfolio” of employment land across the City, including for sustainability reasons, and in the absence of any obviously preferable practical alternative (such as minimum size of site), I accept the local justification that the (potential for at least) 50 jobs threshold should be retained for the definition of strategic employment sites in the CS. Thus, beyond the Council’s FPCs that I endorse, there is no need for any further amendment to map 5 on p.60 of the CS. Subject only to replacing “protected” with “retained” in line 2, policy SG15 is sound without other changes.

Issue 14 – Is the percentage of new jobs expected from the hospital and universities [about 30%] justified by robust and credible evidence ?

- 3.60 I refer elsewhere to doubts about the new job contributions that the CS expects from the two local universities and the hospital to 2026. This is particularly in view of the recent economic recession and likely public sector spending restrictions for the shorter term at least. Consequently, I share the views of those who question that about 30% of new jobs in the City over the plan period will come from these three sources alone, despite the evidence in CS/S6.18.
- 3.61 I note the general support of the University of Warwick concerning expansion plans that have already been permitted and do not doubt that the growing international/research reputation of that institution, amongst other things, should ensure that it will continue to prosper, in the longer term at least. However, no such clear reassurance of significant future employment growth is available for either the University of Coventry or the University Hospital. Consequently, the evidence base to support the estimates of new jobs at either over the plan period is less robust as a result.

- 3.62 In such circumstances, it seems unwise to rely on these three sources alone to the degree that is the case at present, as part of the overall economic development strategy for the city. Such reliance, when taken alongside the loss of local manufacturing jobs during modern times and the fact that the Council themselves as the city's current largest employer will face similar short term financial constraints, implies that the mixed and balanced economy sought might not be achieved over the plan period.
- 3.63 Therefore, I am not satisfied that the percentage of new jobs that the CS expects from the hospital and universities over the plan period is fully justified by the evidence available. Nor is it now reasonably realistic in practice in the light of present information, some of which was not available when the document was drafted. Accordingly, I conclude that such references should be deleted from part 3 of policy SG14, as well as paras 6.64 and 6.66. In my judgement, the overall economic strategy remains sound without such unnecessary details, as an unjustified over-reliance on the public sector to provide the jobs sought could be misleading and unhelpful when delivery will be challenging enough in any event in the medium and long terms following the recent recession.

Issue 15 – How will future employment land allocations be brought forward into the portfolio of sites when required ?

- 3.64 It is effectively common ground that the RSS approach of maintaining a "minimum reservoir" of at least 82 ha of employment land at any one time is appropriate for the city. A consequence is that it is not essential, nor desirable in terms of the potential implications for greenfield sites, due to the inevitable turnover of PDL, for the CS to seek to identify at this stage all 100% of the land that might be required for employment development up to 2026.
- 3.65 However, if some new land is required it is important that there is clarity on how this would be achieved. For my part, I am satisfied that the AMR would clearly identify any emerging material shortfall in provision. This should then prompt the Council and other interested parties into bringing forward additional sites, given the ongoing requirement set out in policy SG15. Moreover, the CS will inevitably be subject to a full review at least once during its proposed 20 year life cycle. In such circumstances, I am content that there is no need for any special or additional procedure or policy in the CS in relation to new employment land coming forward beyond the normal AMR process and any necessary reaction thereto through the development management process.
- 3.66 Notwithstanding, in the event of such a situation arising and requiring land outside the city to be considered it may well require more urgent action than could be achieved through the Review of an existing or preparation of a new CS by any of the adjoining districts. Accordingly, it seems to me that the words "in their core

strategies" should be deleted from the end of the last sentence of para 6.72 for accuracy.

Issue 16 – Are the minimum employment generation requirements in policy SG18 appropriate and realistic in all the relevant circumstances ?

- 3.67 I note that the two minimum employment generation requirements set out in policy SG18 (for both large and small scale B8 uses) are based on considerable research on average densities of business floorspace as co-ordinated in the Employment Land Study (DTZ – June 2007), albeit there is nothing more recent than 2004. To that extent at least they are credible as a general assessment across the various different types of business uses.
- 3.68 I also recognise that minimum requirements are sought by the Council to reinforce other policies in the CS, including encouraging more efficient use of PDL, directing B8 uses to the more sustainable locations and, potentially at least, protecting the GB from unnecessary development. However, I consider that these requirements have two fundamental flaws in their intended operation as part of any development management policy relating to B8 uses that mean no such contribution would be made.
- 3.69 Firstly, if a proposal is able to meet all the other relevant and appropriate criteria in the policy, it would be unreasonable in principle to refuse permission simply because it could not be demonstrated or guaranteed by prospective occupiers that a minimum level of jobs would always be provided on the site, even if initially compliant.
- 3.70 Secondly, the Council could not control or even practically continue to monitor the number of jobs available over time once the use was in operation, without an inordinate use of resources. In any event, it seems to me that the other policy criteria, all of which I consider to be consistent with the latest national guidance in new PPS 4, should operate to preclude new B8 uses being permitted in unsuitable locations in the city.
- 3.71 Consequently, there is no justifiable need in terms of furthering the economic strategy for the Council to try and exercise control over the detailed number of jobs provided on such sites. In such circumstances, both the minimum employment generation requirements are inconsistent with national guidance and unnecessary, as well as unreasonable in principle. They should be deleted from the policy in order for it to be sound.

Issue 17 – Land at Willenhall Triangle

- 3.72 In respect of the "Willenhall Triangle" site, north west of the A46, allocated on the PM for new employment development (4.67 ha) (Site 2), I endorse the Council's judgement that it is suitable in

principle for that use. I further agree that vehicular access to serve even B1 offices only on that scale could only reasonably be obtained from the A46, rather than through the narrow streets of the housing estate to the west or even, realistically, across the railway line to the north east. However, the Highways Agency (HA) continues to oppose any new access/egress for employment development onto the trunk road at this point for highway safety and traffic flow reasons, in line with national guidance in PPG 13.

- 3.73 To my mind, the fact that planning permission was granted for a roadside services scheme on part of the site with an A46 access/egress arrangement some years ago, that has now expired, does not override the important current highway concerns. This is despite the apparent continuing need for such a facility between Warwick and the M1. Unless and until a workable solution that is acceptable to the HA (and presumably also economically viable) can be arrived at, the site is not deliverable for new employment. Accordingly, it must be omitted from the CS on that basis alone as there does not seem to be a reasonable prospect of the impasse over access being resolved any time soon to allow the site to come forward. Therefore, I must recommend that "Site 2 – Land at Willenhall Triangle (4.67 ha)" be deleted from Table 4 and Map 4.

Issue 18 - Land East of Orchard Retail Park

- 3.74 The CS allocates 2.74 ha of land east of the existing retail park comprising a sloping open field, surrounded by hedges and north west of the A46, for new employment development. As I understand it, planning permission has recently been granted for a new Post Office mail depot on part of the site. However, the landowners also seek the further allocation of a similar field further east. This site is bounded by Willenhall Wood, an Ancient Woodland and designated Local Nature Reserve (LNR) of about 10 ha, owned and managed by the Council, to the north west and north east.
- 3.75 The woods were originally identified as a Site of Interest for Nature Conservation (SINC), now LNR, in 1989, with the boundary of the SINC extended in 1994 to include adjacent land comprising the objection site between the woods and the A46. Both Natural England (NE) and the Warwickshire Wildlife Trust (WWT) suggest that the site constitutes an ecological feature of high value that contributes to the city's biodiversity assets. It comprises a south facing tract of undisturbed grassland on the woodland edge that provides a feeding area for up to 15 types of birds on the Red and Amber lists, as well as protected species such as bats and grass snakes. The location on the city's edge, relatively close to Brandon Marsh and Brandon Wood, is also said to enhance the land's value for nature conservation as part of a wider wildlife corridor.
- 3.76 However, the present condition of the site arises largely from an absence of active use or management since the abandonment of a former fruit farm shortly after the construction of the A46 bypass.

This has led to the gradual encroachment of scrub onto the former “meadowland”. Moreover, the area is significantly affected by noise and disturbance from the busy A46 to the south east and its location directly beneath the main runway glidepath into the nearby Coventry Airport.

- 3.77 Recent detailed survey work by reputable ecological consultants has confirmed that the role of the site as a buffer to the woods and as part of the local habitat mosaic as a woodland edge is likely to be significantly reduced in the relatively short term without active management. Moreover, both NE and the WWT have accepted in correspondence (dated 20/05/09 and 04/09/09 respectively about earlier planning applications for the mail depot on the objection site) that an employment use would be acceptable on the majority of the land, subject to an appropriate mitigation strategy being implemented on the remainder. This would involve the retention of a minimum 30m wide buffer to the woods and the guaranteed implementation of an ongoing area management plan, including new planting, plus carefully detailed design, layout and lighting.
- 3.78 In such circumstances, the nature conservation interest of the land and its role as an adjunct to the Willenhall Woods LNR would be best secured by the implementation of an agreed active management regime for a retained buffer of at least 30m width along the full edge, in connection with new employment development on the remainder (1.6 ha) of the site. From all the relevant evidence I am also satisfied that, with the retained buffer, such a scheme need not lead to any material harm to the woods or their value as a natural habitat.
- 3.79 My conclusion in this respect is not altered by the presence of a relatively short and isolated stretch of mature but generally poor quality hedgeline running diagonally across the site nor the two large trees within it (one of which apparently contains a bat roost) as suitable mitigation measures can be incorporated into any detailed scheme in respect of their loss. From the recent survey work, I am also satisfied that there are no examples of specific flora on the site that would justify the need for translocation due to their rarity value, nationally or locally.
- 3.80 The EA confirms that the site is in Flood Zone 1 and thus not precluded from development on flood risk grounds. Subject to locally well established height restrictions on new buildings, there need be no interference with the continuing safe operation of the nearby airport, its Instrument Landing System (ILS) or main runway. A suitable vehicular access is available from the road already serving the retail park (and the proposed new mail depot) and both the peripheral hedges and public footpaths crossing the site can be retained, albeit with a diversion in the latter case.
- 3.81 The formal establishment of a public footpath across the A46 via the existing underpass would be much safer for pedestrians than

the “at grade” crossing to the north east and a further benefit of the proposal. I note that the area appears to be used informally by local residents of the adjoining housing estate to the north west, e.g. for dog walking, at times but it remains in private ownership. In any event the improvement of the local public footpaths, including the use of the underpass, would allow this to continue.

3.82 In particular, I conclude that this site is suitable and available and should also be allocated in the CS, alongside the field to the south west to help make up the shortfall. In practice, this would mean that the allocation for new employment development (East of Orchard Retail Park) in Table 4 should be increased from 2.74 ha to 4.34 ha. This is on the basis that the retention of a 30m wide buffer to the woods would mean that built development could be permitted on a further 1.6 ha of land.

3.83 In the light of the present non deliverability of the Willenhall Triangle site for new employment development and thus the deletion of 4.67 ha, the new total of employment and mixed use land allocations in Table 4 of the CS would almost exactly match the required minimum 82 ha of supply at this point in time, with the Bestway site also to be retained in employment use rather than allocated for new housing.

Recommendations

The following changes are required to make this part of the CS sound: - (in addition to the Council's FPCs) -

**Para 6.64 – reword second sentence after “about half” as follows:
– “within the City Centre, others” before “through”.**

Also, under “Regional Policy Guidance” delete “an unspecified amount of” in relation to Ryton.

Para 6.66 – replace “about 30% of total jobs at about 22,000” with “a significant number of new jobs”.

Map 4 and Table 4 – delete Land at Willenhall Triangle (4.67 ha) and amend East of Orchard Retail Park from 2.74 to 4.34 ha. Amend totals accordingly.

Para 6.72 - delete “in their Core Strategies” from end of last sentence.

Policy SG15 – replace “protected” with “retained” in second line.

Policy SG17 – delete last two sentences.

Policy SG18 – delete point 3 in relation to large scale and point 4 in relation to small scale.

Matter 3A - Housing Policies [Policies SG6 – SG8]

Issue 19 – Is the overall number and phasing of new housing consistent with regional policies and realistically deliverable within the plan period, taking into account the evidence in the SHLAA and the opportunities identified within the city, including the city centre and regeneration areas ?

- 3.84 Clearly, the overall number of new houses (33,500) identified in the CS to be provided over the plan period directly derives from the RSS Phase II Review, as endorsed by the RSS Panel Report. It is therefore consistent with the most relevant and up to date regional policies and the agreed sub-regional strategy set out therein, as endorsed by the democratically elected constituent local authorities. Although strongly opposed by numerous respondents, most notably representatives of those areas to which new housing would be directed, I am satisfied that the Council has properly carried out the relevant procedures in following the RSS and the sub-regional strategy in seeking this level of new housing in the CS.
- 3.85 Moreover, I also consider that the 2009 RSS Examination provided the proper opportunity for the overall level of development proposed to be thoroughly examined in the appropriate regional and sub-regional context. I further conclude that the Panel Report's conclusions in this respect remain directly relevant, despite the impact of the recent economic recession, as they are based, like the CS itself, on the whole of the plan period to 2026.
- 3.86 If the agreed sub-regional strategy is to be properly implemented and the relative economic decline of the Coventry/Nuneaton regeneration zone, particularly in relation to the more rural districts around, is to be reversed, then I agree with the RSS Panel Report that the city has to be the focus of substantial new housing, over and above its own locally generated needs, during the plan period. Taking into account all the available evidence, I also fully endorse the RSS Panel Report's conclusion that this growth should be sustainably focussed principally on a north/south axis, centred on the city, thereby protecting the strategically important Meriden Gap. It would also take advantage of planned investment in public transport improvements, such as NUCKLE 1 & 2, in this corridor.
- 3.87 In general terms, the intended phasing of new housing development indicated in the CS is also consistent with the relevant regional policies in that, as para 4.18 of the RSS Panel Report makes clear, urban PDL should be redeveloped as the first priority. The less sustainable greenfield sites, including those to be released from the GB, would only be brought forward as the need arises and not before. This is entirely in accord with national guidance in PPS 3 and likely to relate largely to the second half of the plan period. Nevertheless, it is equally important to recognise the point, also made in para 4.18 of the RSS Panel Report, that large new greenfield sites often require long lead in times (counted in years)

so that suitable infrastructure, such as transport improvements and services, can be put in place alongside new housing and other uses.

- 3.88 I am also conscious of the criticism levelled at the CS that it requires a very significant increase in the annual level of new housing delivery within the city's housing market area. This is particularly so compared to that achieved in the last couple of years but even in relation to actual performance in more buoyant economic circumstances before that. However, whilst optimistically based, both the RSS and CS, as reflected in the Council's Housing Trajectory, have prudently taken into account the likelihood of a "slow start" and the consequent need for "backloading" of housing delivery in the second half of the plan period.
- 3.89 Moreover, opportunities will exist for "reserved" land and other new housing sites to be brought forward via the "plan, monitor and manage" approach, in the event that the AMR reveals a material shortfall in delivery that needs to be made up. Although very challenging, there is nothing to indicate that the necessary totals cannot be achieved over the whole plan period, particularly if the full sub regional strategy, including relative restraint on housing growth in the surrounding districts, is implemented consistently.
- 3.90 Accordingly, it is essential that the CS contains an appropriate and practical approach to phasing, so as not to prejudice the overall delivery of new housing in and around the city to the timescales envisaged. It is common ground that the first priority should be PDL within the existing built up area of the city, as identified in the SHLAA (CS/S6.5) and including the regeneration areas listed in Table 3 of the CS. I am therefore satisfied that the overall phasing implied in the CS is appropriate and consistent with the relevant national guidance and regional policies in general terms. However, some practical concerns remain and I deal with this matter in further detail later in this report in the light of other recommendations that also need to be taken into account.

Issue 20 – Has it been demonstrated that there will be a 5 year supply of developable new housing land, 6-10 year supply on specific sites and a 11-15 year supply in broad locations, in accordance with PPS 3 ?

- 3.91 In addition to preparing a new Housing Trajectory, the Council has also now updated the relevant information in Tables 2 and 3 of the submitted CS in the Housing Topic Paper (CSTP.01) to assist the assessment of the housing land supply position. The latest version of the trajectory (App 1 – Revised Housing Trajectory – Nov 2009), prepared in the light of the RSS Panel Report Addendum (Nov 2009), shows that, essentially, there is an adequate supply of mainly urban PDL sites to meet the RSS requirements for the first 5 year period, albeit with a minor shortfall in the first years.

- 3.92 This largely reflects recent national and local economic circumstances relating to urban redevelopment, rather than land availability as such. So, as the house building industry emerges from the recent recession and resumes construction on a number of previously “stalled” (but otherwise available) sites, the necessary overall numbers seem likely to be made up over a relatively short time, as indicated in the Council’s latest Housing Trajectory (Nov 2009). My recommendations also include the addition of 3 more allocated sites, capable of delivering around 300 new dwellings in total in the next 5 years.
- 3.93 As things stand, the Council’s latest Housing Trajectory shows a significant shortfall on the new housing provision needed to meet the RSS requirements for the 6-10 year period, followed by a material over supply for the 11-15 year period. This is partly explained by the inclusion of potential new housing to be provided as part of the regeneration of the city centre in the latter category. In accord with guidance in PPS 3 it can only be counted as a “broad location” and within that period until specific sites are allocated in the emerging CCAAP.
- 3.94 However, the CCAAP is progressing well, with a specific list of new housing sites included in Table 3 on p.60 of the November 2009 document and on the PM. Based on this latest robust and credible evidence, I am satisfied that there are reasonable prospects of the majority at least of these sites making a material contribution to new housing supply in the city during the middle years of the CS timescale, rather than only towards the end.
- 3.95 Once allocated, they will be assessed accordingly in the Housing Trajectory and, in practice, are likely to help make up a very significant proportion, if not all, of the shortfall otherwise apparent for years 6-11 at present. In the event that they do not then, in compliance with the plan monitor and manage approach of PPS 3, the Council will have to bring forward other sites, such as those reserved in the GB (List 1 first), earlier than currently anticipated. In the light of the above, I am also satisfied that the city centre is capable of providing the around 6,000 net new dwellings in total that the CS assumes it can during the plan period.
- 3.96 In relation to the supply for the 11–15 year period, I take into account that the Council has made no specific allowance for contributions from previously unidentified (mainly former employment) sites or from small sites of less than 5 dwellings towards the overall RSS requirements in accord with national guidance in PPS 3. Nevertheless, the Council’s figures in para 3.4 and 3.5 of the Housing Topic Paper (CSTP.01), which themselves derive from the AMR, show that they amounted to about 30% and 6% (excluding former employment sites) respectively of all new dwellings in the city between 2001 and 2009.

- 3.97 Whilst at a lower rate than previously as most larger sites at least should have been included in the SHLAA, the likely continuing contribution of new dwellings from these sources will be counted in the AMR and contribute to overall new housing supply. Such additional contributions will provide useful flexibility within the overall housing total required by 2026 and a buffer of housing land supply against the need to bring forward peripheral reserved GB sites, including those in adjoining districts, before they are strictly required in the second half of the plan period. I also consider that the recommendation in relation to policy SG17 will materially increase the number of new homes provided on existing vacant and underused employment sites. Accordingly, I am satisfied that in the current Coventry context, the above may be taken into account in general assessments, such as in Table 2, of whether or not the policies and proposals in the CS will be likely to deliver the new housing requirements of the RSS over the whole of the plan period.
- 3.98 On a related matter, the Council's housing figures in Table 2 include an allowance of 2,160 units for bringing presently empty homes back into use. Whilst an entirely laudable initiative in principle, the evidence is that Coventry's overall vacancies are not significantly greater than the national and regional averages, even if some properties have been hard to let over past years. Moreover, a vacancy rate of about 3% is generally acknowledged as necessary and appropriate to facilitate turnover in the housing market. Most importantly, national guidance, as confirmed in a DCLG letter of 20 May 2009, is quite clear that such an allowance is not appropriate, whatever the local circumstances, in housing land supply assessments as no new dwellings are actually being created. Consequently, there can be no reduction for the re-use of currently empty homes from the overall new housing requirement and it must be omitted.
- 3.99 Notwithstanding the deletion of any contribution from the re-use of empty homes, but also allowing for the other site related recommendations in this report, I am satisfied that the CS demonstrates that there will be a 5 year supply of suitable, available and deliverable land for new housing in the city. Moreover, once the city centre new housing sites in the CCAAP become allocations, as seems likely very soon, there will also be a satisfactory 6 - 10 year supply on a similar basis.
- 3.100 It is not essential that a CS identify each and every site on which new housing is expected over a plan period of 15/16 years, provided that specific allocations are sufficient for the first 5 and 10 year periods respectively, as is the case here. What is required is robust and credible evidence that the policies and proposals therein have reasonable prospects of delivering the RSS requirements over the whole of the plan period. In the light of my recommended change to policy SG17, I consider that there will be a material increase in the number of new dwellings coming forward as part of

mixed use schemes on some current employment sites, that will not have been taken into account in the SHLAA as yet.

- 3.101 And, in my judgement, it is also reasonable in all the relevant local circumstances to take into account the probable contribution from small sites in the city (also not included in the SHLAA), based on the firm evidence of previous significant and continuous delivery, when considering whether the overall RSS requirements are likely to be met. A continuing 6% contribution from sites of less than 5 units would be equivalent to about 2,000 new dwellings over the whole plan period. In this specific local context I therefore conclude that Table 2 of the CS should include a figure of about 2,400 (equivalent to around 150 per year) total new housing completions to be realistically and reasonably expected from both this source and through the change to policy SG17 over the full plan period. I therefore judge the CS to be sound in respect of this issue, albeit the overall assessment of new housing numbers in Table 2 needs to be amended accordingly.

Issue 21 – Is it clear that all previously developable land (PDL) and/or all suitable greenfield (but not GB) sites have been included and, if not, why not ?

- 3.102 The Council's SHLAA (CS/S6.5) has been carried out in accord with national guidance and practice advice and on a comprehensive basis across the city (excluding small sites). The information therein has been subject to consultation and input from landowners, developers and other interested parties. This includes in relation to the availability and deliverability of sites, as well as the scale and timing of likely housing completions. I am therefore satisfied that it is robust and credible and represents the best available evidence of the current housing land supply in the city.
- 3.103 As the Council points out, the fact that no entirely new strategic sites have emerged from either the private or public sectors in response to the opportunity to promote "omission" sites into the CS clearly supports this judgement. I have come to a different conclusion from the Council regarding the suitability/acceptability of some of these "omission" sites, or parts of sites, that were put forward to the examination in a few instances. However, this does not, in any way, undermine the comprehensiveness or credibility of the SHLAA as my conclusions are based on matters of judgement on their planning, sustainability and other merits, rather than that they had been entirely overlooked originally.
- 3.104 Consequently, I conclude on this issue that all potentially suitable PDL and greenfield (but not GB) sites have been considered by the Council and taken into account in preparing the CS, where appropriate. Accordingly, the Council's assessment of the existing capacity of the present built up area of the city is not flawed in this respect as some respondents have suggested.

- 3.105 As to density, some argued that the Council was underestimating the practical capacity of the existing built up area to accept new housing by assuming densities lower than those recently achieved on PDL sites, especially in or near the city centre. However, over optimistic assumptions of this nature can lead to a reliance on achieving higher densities at the expense of other important objectives, such as good design and open space provision. It could also result in a failure to identify sufficient new housing sites overall, particularly if one or two larger ones should prove to be more constrained or only deliverable at a slower rate than originally envisaged. It needs to be borne in mind that the RSS figures are a minimum requirement, not a maximum, or even a target.
- 3.106 There remains the possibility of achieving higher densities on some sites, provided other important objectives are not thereby compromised, especially those with good public transport accessibility. In my judgement, this provides a useful degree of flexibility towards achieving the 5, 10 and 15 year housing land supply figures in practice and the overall delivery of the RSS requirements, rather than applying higher densities “across the board” and some then not being achieved in practice. This element of flexibility also reinforces my conclusions regarding the adequacy of housing land supply in general in the CS.
- 3.107 In relation to employment land, I acknowledge the argument that it would be possible to release a higher percentage, be it some whole sites or large parts of others, for redevelopment for new housing across the city. However, the retention of a strong and varied employment base and the continuing availability of a range of size and type of sites for new operations and technologies, as well as the expansion of existing businesses, is a fundamental element of the RSS and the CS itself.
- 3.108 Without a suitable selection of size, type and location of sites across the city, I share the concerns of those, including AWM, WCC and the Council, that economically important objectives would be compromised and unnecessarily so when other alternative sustainable housing sites are identifiable, albeit some are in the present GB. At this crossroads in the future growth and development of the city, I firmly endorse the choice made by the Council that the release of GB land for new housing has to take place if the agreed sub-regional strategy is to be properly implemented over the plan period, including in terms of retaining and improving local employment provision.
- 3.109 In fact I have made recommendations that amend the implementation of the relevant policy (SG17) protecting strategic employment sites for practical reasons, amongst other things, and this should help increase the number of new houses provided on urban PDL in the city by giving greater flexibility to mixed use schemes. This too supports my conclusions on overall housing land supply as it will make a meaningful contribution that has not

previously been taken into account in the totals in Table 2 of the CS. Nevertheless, it remains essential to retain the majority of these sites and others for continuing employment uses for strategic reasons. Consequently, I see no need to fundamentally alter the approach set out in the CS to the release of employment land for new housing in the city to 2026.

Issue 22 – How many new houses should be planned for at Walsgrave Hill Farm [Site 7, Table 2] and why ?.

- 3.110 Allocated in the CDP (CS9) for 500 new dwellings on about 21 ha in total, it is common ground that some at least of the land between the A46 to the east, the University Hospital to the west, Toys R Us to the north and Hungerley Hall Farm to the south is suitable in principle for new residential development. Any development must retain/safeguard the flood plain of the River Sowe and Withy Brook along the western part of the site. Partly due to its operational scale as a regional facility, the Hospital urgently needs a second (emergency only) vehicular access but this cannot be taken directly from the A46 for highway safety reasons, according to the HA.
- 3.111 Following extensive negotiations between the Hospital, the HA, the EA and the prospective developers, an alternative scheme to that originally envisaged has been brought forward. This would put new housing development on a similar sized area to the east of the watercourse and west of the A46. It would also create a linear public park running from north to south alongside, incorporating a functional ecosystem of high biodiversity value as a green corridor. A second access for the hospital would run via a link to Clifford Bridge Road to the south through Hungerley Hall Farm.
- 3.112 The revised scheme has been made possible by reconsideration of the flooding issue in the light of the Level 1 SFRA of June 2008 (CS/S6.1), Level 2 SFRA of July 2008, and a revised site specific FRA of October 2009. The EA is now satisfied in principle with development to the east of the watercourse, together with a rationalisation of the flood plain on both sides by the provision of local green space to serve the new housing and the safeguarding of the river corridor by the creation of a linear park. However, it would also extend new built development onto about 4 ha of land presently in the GB, south of the former CDP allocation and closer to Hungerley Hall Farmhouse, a grade II listed building.
- 3.113 The CGBR (CS/S7.8) effectively accepted that the land west of the A46 in this locality was suitable in principle for new development but at that time it was thought to be undeliverable for flooding reasons. I agree that the A46 is the logical long term defensible boundary for the GB on this side of the city, rather than, say, the River Sowe or Withy Brook, given existing development in the vicinity. Moreover, the CGBR also confirmed that whilst the watercourse corridor is a functional ecosystem of high biodiversity value provided this is retained the remainder of the area is of

relatively low nature conservation interest, where new built development would not be opposed for ecological reasons.

- 3.114 A comprehensive scheme on the basis now jointly envisaged would provide not only the new second access, as well as improved car parking for the hospital, but also a linear public park along the river corridor and links to the bridleway leading to Coombe Abbey Park to the east of the city. Providing that the details include noise attenuation measures from the A46, retention of the setting of Hungerley Hall Farmhouse and the provision of SUDS, I am satisfied that the revised scheme for about 900 new dwellings would be appropriate and acceptable in principle. It has also been the subject of satisfactory public consultation and SA prior to the CS examination, including in respect of the removal of about 4 ha of land from the GB. Accordingly, I conclude that the number of dwellings for this site should be amended from 700 to 900 (and not the 800 suggested by the Council in their initial FPCs) and the land allocation on the PM amended accordingly.

Issue 23 – Should the Bestway site be retained for employment ?

- 3.115 About 4.4 ha (21.5%) of the proposed housing allocation on land west of Banner Lane and south of Broad Lane for 1,070 new dwellings is currently occupied by a B8 depot/warehouse owned by Bestway. This established use currently provides about 90 jobs and has the benefit of a planning permission for a limited expansion, granted on appeal in 2008, albeit not yet fully implemented. Lying on the western edge of the city, about 1.5 miles from an A road, I accept the Council's view that this does not constitute a strategic employment site in the city. Moreover, with new housing to be developed to the south and west (and existing dwellings across Broad Lane to the north east), I also accept that, ideally, this part of the overall site should be redeveloped for housing also, if only to avoid or reduce potential conflicts of interest between adjoining residential and warehousing uses.
- 3.116 Nevertheless, the present owners are adamant that they do not wish to relocate the business or sell the site for new housing for the foreseeable future and will complete the implementation of the recent planning permission for expansion of the B8 use on the site. In such circumstances, the site is not available for redevelopment for housing at present. Moreover, in the absence of any other evidence to suggest that the site can come forward nor are there reasonable prospects that it will become available for housing, even within the 20 year plan period of the CS. Consequently, it cannot reasonably or realistically be included as a housing allocation in Table 3 of the CS, which must be amended accordingly by deleting reference to this part of the overall site.

Issue 24 – Will the intended management of new housing delivery prove adequate to ensure that the strategic aims of the CS are met, for example, is it clear in what order reserved GB land would

be released if monitoring identifies a need, and, if not, what else needs to be done and why ?

- 3.117 During the examination numerous respondents pointed to a lack of clarity in the CS as to the timing and phasing of new housing development, beyond “PDL first”, particularly in relation to the release of land from the GB, both within and outside the city. This is not just a matter of when such sites might be released but also in what order, if any. Policy SG6 refers to “managing” the release of housing land, in accord with regional policy, whilst SG8 adds a reference to the need to maintain a 5 year supply of housing land with “reserved” sites to be released only when insufficient urban ones remain available. There is no mention of which “reserved” sites might be released first, if and when any are needed and I consider that this needs to be addressed to provide greater clarity.
- 3.118 In terms of the overall supply of land the Council will impose no phasing policy restraints on suitable development sites in the city, including the Regeneration Areas, the Strategic Urban Allocations (which include some greenfield sites) or the Strategic Mixed Use Allocations with a housing element listed in Table 3 of the CS. Nor should it, in my view, if the regional requirements are to be met over the plan period and these categories of site should be developed first in sustainability terms. The remaining potential supply of new housing land is largely made up of the proposed Keresley eco-suburb, the other “reserved” sites in the present GB and the cross border housing opportunities in adjoining districts.
- 3.119 For reasons of scale and flexibility, as well the long lead-in times needed to bring forward the development of major new housing sites, it seems to me that the smaller “reserved” sites should be released before others. This would enable the Council to respond more quickly to any emerging shortfall in the 5 year housing land supply, via the AMR, including through a likely shorter timespan from release to completion.
- 3.120 It would avoid the need to commence development of larger sites until truly required, by virtue of the breathing space provided by smaller sites being developed first. Importantly, it would also provide the necessary time for an AAP to be completed in respect of Keresley, and potentially for the cross border housing schemes too, which I consider necessary to ensure satisfactory and sustainable development.
- 3.121 Consequently, the Keresley eco-suburb and the cross border housing in Warwick and Nuneaton/Bedworth should constitute List 2 of the Reserved Land in Table 3 of the CS for new housing. All other reserved GB sites, including those subject to other recommendations in this report, should constitute List 1 to be phased in earlier. I recommend accordingly to improve clarity.

Issue 25 – Should the CS contain a housing trajectory, as it includes site allocations, and/or contingencies in the event that completions do not come forward as expected ?

- 3.122 Para 55 of PPS 3 says that housing trajectories should be prepared to help support the forward planning process, by showing how housing policies will deliver the necessary new dwellings over time. Annex B of the old PPS 12 gave guidance as to how a robust one should be prepared. It does not however require that it should be included in a CS, even one that contains numerous strategic new housing land allocations as in this case, rather that it form part of the supporting evidence base in conjunction with the AMR. I also acknowledge the Council's point that a housing trajectory can only provide a "snapshot" of the situation at any particular time and will require regular updating, in line with the AMR, on at least an annual basis, in accord with advice in para 4.47 of PPS 12.
- 3.123 Nevertheless, much of the information contained in a housing trajectory is needed in any event to demonstrate the soundness of the CS and its policies and proposals. Moreover, an updated one has been provided by the Council as Revised Appendix 1 to their examination statement on Matter 3A, in line with recommendation 4.1 of the RSS Panel Report Addendum (Nov 2009). In such circumstances, I conclude on this issue that, whilst it does not need to form part of the CS itself, it would be particularly relevant and useful if this most recent version of the Council's Housing Trajectory were to form an Appendix to the document.
- 3.124 This should include the anticipated delivery of new housing in the two adjoining districts to help meet the city's overall requirements in the second half of the plan period. It can then be updated separately, but alongside the AMR, on at least an annual basis and thereby assist the Council and its neighbours, as well as all other interested parties in assessing housing delivery against the RSS requirements and particularly the timing of new land releases, if and when required. In this way it would facilitate the satisfactory implementation of my recommendation in relation to the phasing of reserved sites. I recommend accordingly.
- 3.125 The CS reports (para 6.26) that there is a local consensus on the need to provide a better mix of housing in the city, including in terms of size, type and tenure with a wider variety of affordable housing and more executive housing at the higher end of the market. Together with improvement of the existing housing stock, including through selective demolition and redevelopment, it seems to me that this is a fundamental objective of the CS and should be reflected in the specific housing policies and proposals.
- 3.126 Notwithstanding the debates over numbers and locations, it is therefore necessary to also examine the policies themselves for their ability to deliver the Council's objectives for the CS over the plan period. For consistency with PPG 2 and the reasons outlined

above, I endorse the Council's FPC to replace "safeguarded" with "reserved" in both policies SG6 and SG8. I am also satisfied that it is necessary for clarity and consistency between policy wordings that both the first part of the first sentence of part 3 of policy SG6 and the first sentence of part 2 of policy SG8 are deleted.

3.127 Firstly, there is no definition of "the first part" or "early" in the plan period anywhere in the CS. Secondly, the wording of this part of both policies is not entirely consistent and could be a source of confusion about the relative priorities (if any) to be given to the different types of new housing site within the existing built up area of the city. In my judgement, what would remain in both policies after the deletions would be clearer and consistent, including about the potential release of reserved land.

Recommendations

The following changes are required to make this part of the CS sound – (in addition to the Council's FPCs) :

Amend Table 2, Table 3 and Map 3 in line with the above and other Recommendations.

Table 2 – Strategic Housing Allocations replace "3,830" with "4,130". "Re-Use of Empty Homes – 2,160" replace with "Policy SG17/Small Sites etc– 2,400". "Total Net capacity with Urban Area – 22,065" replace with "Total Net Capacity in Urban Area – 22,600". Keresley Urban Extension replace "3,500" with "3,600". "Land at Cromwell Lane – 390" replace with "Land at Browns Lane – 65". Land at Duggins Lane replace "50" with "70". Total Housing Supply within Coventry replace "26,155" with "26,500".

Table 3 – Walsgrave Hill Farm replace "800" with "900". Delete "Bestway site – PDL – 220". Add "Land at Shilton Lane – Greenfield – 100", "Land at Grange Farm, Longford – Greenfield – 100" and "Land at Banner Park – PDL – 100". Keresley eco suburb replace "3,500" with "3,600". Replace "Land at Cromwell Lane – Greenfield – 390" with "Land at Browns Lane – Greenfield – 65".

Add the Council's Revised Housing Trajectory (prepared in response to the RSS Panel Report Addendum of 3 November 2009), as amended by the other Recommendations in this Report, as a new Appendix to the CS.

Policy SG6 – Replace last bullet point in first para with "Reserved Sites – List 1 and Reserved Sites – List 2".

Amend Proposals Map to define all "Reserved Sites – List 1 and Reserved Sites – List 2" with boundaries, and specific designations on the key.

Matter 3B – Housing Policies [Policies SG10 – SG13]

Issue 26 – Policy SG10 – Is the threshold and percentage for affordable housing justified by up to date local evidence of housing needs and economic viability and does the policy provide sufficient flexibility if viability is an issue for a particular scheme ?

- 3.128 The threshold of 15 dwellings (or 0.5 ha) set out in part 2 of the policy is the same as that identified in PPS 3 for national application in the absence of any special local factors. There is no evidence that this threshold is, in itself, too low to be viable for Coventry over the plan period, despite the recent economic circumstances. Therefore, in the light of the Strategic Housing Market Assessment (April 2008) (CS6.6) (SHMA), the Preliminary Affordable Housing Viability Analysis (March 2009) (CS6.13) (PAHVA) and the further work set out in Appendices 1 and 2 of the Affordable Housing Topic Paper (July and September 2009) (CSTP.06), I am satisfied that all the available evidence supports the Council's judgement in relation to the site size threshold in part 2 of the policy.
- 3.129 The SHMA (CS6.6) also shows that there is a need for about 300 (304) new affordable dwellings per year in the city. About 30% of the total new housing units built over the last 3 years come into this category. However, this includes schemes undertaken directly by Registered Social Landlords, including Housing Associations. As it happens a 25% contribution from the larger private sector schemes (i.e. 15 or more units), as per the submitted policy, would mean that the current level of new affordable housing provision across the city would be approximately maintained. It would also comply with the minimum regional requirement recommended in the recent RSS Panel Report (Sep 2009). This was based on their assessment of regional economic viability, including in the main metropolitan centres such as Coventry.
- 3.130 Nevertheless, as required in para 29 of PPS 3, it is still necessary to assess the percentage on the basis of likely local economic viability. In this context, I recognise that the original PAHVA (CS6.13) completed in March 2009 was carried out following the SHMA (CS6.6) but before the main onset of a significant economic downturn. Necessarily, some of the assumptions therein will no longer be entirely accurate (e.g. on land values) as things stand. However, the study could only ever be a "snapshot" of the position at any one time. As such I consider that it provides a generally robust analysis of likely local economic viability during relatively more stable and/or more normal market conditions, even though it could not cover all possible scenarios to 2026.
- 3.131 More recent analysis, as recorded in the Affordable Housing Viability Study Topic Paper (CSTP0.6) has considered other scenarios, including a 10% reduction in overall viability of new housing development in the city compared to the previous "stable market conditions". Although prepared beforehand, this further work has

been undertaken on a comparable basis to that recommended in the HCA Economic Appraisal Tool (August 2009). It considered five levels of target (from nil to 40%) and three different site sizes and types of area (high, medium and low value) to represent the varied locations and land/property prices across the city. Overall, it provides the necessary, more detailed, local evidence to back up the earlier work and help confirm that the requirement for 25% affordable housing is a reasonable and realistic target over the whole of the plan period if local needs are to be met.

- 3.132 The conclusion that, in the low value areas, a 25% target would not always be achievable at times which are 10% or more below “stable market conditions” is based on the assumption that no support grants of any kind would be available. In such circumstances it would be necessary for the Council to apply the target flexibly and pragmatically. This would involve balancing the need for affordable housing with that of overall delivery, on a site by site basis and according to the specific details of each particular scheme, as happens now in many instances under present policies.
- 3.133 As a target and not an automatic minimum requirement, the policy allows for the negative effects on viability of the current financial climate to be taken into account. The fact that the target will be challenging for the Council to achieve, especially early in the plan period, is not in itself a reason to deem it unreasonable or unrealistic, given it is intended to apply up to 2026. This will be well beyond the recent economic downturn and the target will have to be closely monitored and adjusted if necessary in the interim.
- 3.134 Clearly, the recent “credit crunch” cannot be ignored but it remains the case that such difficulties normally, in the past at least, form only one part of the overall economic cycles that would occur within the lifetime of the CS and for which it must plan. Provided that there is sufficient flexibility within the plan for the differing circumstances prevailing at the likely stages of the economic cycle to be catered for in relation to individual schemes, then relatively short term issues of this nature need not dictate the main basis of the policy; rather how it is implemented in practice.
- 3.135 Therefore, given its viability as a target in the majority of realistic scenarios investigated in the latest study and under “stable market conditions”, I am satisfied that a 25% target requirement should be included in part 2 of policy SG10 for application over the plan period to help meet the clearly identified local housing needs of the city. In the event that any particular scheme cannot comply for whatever reason, the opportunity exists for a viability assessment to demonstrate that flexibility should be applied, if appropriate.
- 3.136 Particularly under present economic circumstances, the Council also acknowledges, as do I, the likely “tension” between the local target for new affordable housing and those for more sustainable homes, arising from compliance with increasing levels under the national

Code for Sustainable Homes as per changes to the Building Regulations between now and 2016. At the examination the Council said that they currently take a realistic and flexible approach to negotiations for all forms of developer contributions, including for affordable housing and also for those required by existing legal agreements in terms of timing and phasing in particular. Taking such public statements into account, I am content that not only does the policy itself demonstrate the necessary flexibility to satisfactorily address this difficult current issue but that the evidence available suggests that the early implementation thereof in practice would too.

- 3.137 For both the reasons outlined above, I therefore endorse the addition of a new sentence at the end of para 6.47, as in the Council's FPCs. This confirms that greater flexibility on affordable housing would apply if a viability assessment for any specific scheme shows that delivery would be affected. In my opinion, this accords with national guidance in PPS 1 and PPS 3 as well as PPS 12. It represents a pragmatic response to the understandable, if hopefully short term, concern about schemes being able to deliver on both policy expectations for economic viability reasons.
- 3.138 In the light of the above, I am able to conclude on this issue that part 2 of the policy on affordable housing is sound and justified by relevant and up to date evidence of local housing needs and economic viability, in terms of both the site size threshold and percentage target requirement. I am also satisfied that sufficient flexibility exists so there is scope for variation if a viability assessment shows that delivery would be directly affected.

Issue 27 – Is there clear evidence of a local justification for 10% executive homes and/or should there be a percentage requirement for elderly persons housing ?

- 3.139 The Council now recognises the importance of a definition of "Executive Housing" if part 3 of the policy is to be effective in practice and I agree that it should be included in the Glossary. Both the Housing Demand Study (2003) (CS/S6.8) and the Strategic Housing Market Assessment (CS/S6.6) identified the general need for more larger and family homes in the city, especially in North Coventry, given the high (about 75%) level of the existing stock in the two lowest (A and B) Council tax bands.
- 3.140 I am therefore entirely satisfied that robust and credible evidence exists to justify a local requirement for a percentage of "executive housing" to be provided in all larger housing schemes in principle. Together with affordable housing, this should help create more mixed, stable and balanced communities across the city, by attracting and retaining higher income social groups, and reduce commuting into the city to a degree.

- 3.141 Whilst such a requirement may marginally influence the ability of some new housing schemes to comply with the minimum density guidance in PPS 3, I doubt that it would be significant in most instances comprising 50 or more dwellings (or 2 ha or more). Moreover, policy SG12 imposes no minimum density requirements, allowing that each project may be considered on its own merits in relation to the criteria listed and therefore for a higher percentage of executive housing if locally appropriate in all other respects.
- 3.142 Notwithstanding the above, it remains necessary to examine whether the stated thresholds are appropriate, particularly as neither derives directly from either study. However, the Council's examination statement for this issue provides evidence that the city would need 15.9% (and 7.9% respectively) of all new homes over the plan period to be in the top two Council tax bands (G and H) to match even the current national (and regional) average.
- 3.143 In my view, the inclusion of an element of executive housing is unlikely to have a significantly detrimental effect on the overall economic viability of most, larger, new housing schemes in the city. If it does then there would still be scope for variations to apply through a viability assessment, as the figure of 10% is a target, not an absolute requirement. Those smaller schemes less able to accommodate a mix of units (or uses) would not be subject to the target at a threshold of 50 units (or 2 ha) in any event. I therefore endorse the Council's judgement that a 10% target is a reasonable and realistic one in all the relevant local circumstances and that it should be applied to schemes of 50 units (or 2 ha) or more only.
- 3.144 The Coventry Older People's Housing Strategy (CS/S6.9) confirms the increasing demand for specialised housing for the elderly arising largely from demographic trends. However, I accept the difficulty of defining a particular proportion of all new housing across the city that it would be reasonable and economically viable to require to be specifically designed for the elderly. In particular, location and especially proximity to local services, such as health care, is an even more important factor in this respect than for most other types of new housing. Also, there are significant differences, including of the level of on site support required, in the types of housing needed by older people.
- 3.145 On balance therefore I agree with the Council that, taking into account the effects of the National Building regulations regarding accessibility etc, there would be no real benefit in seeking an overall minimum percentage provision of new housing for the elderly in all schemes. Rather, I consider that the increasing need should continue to be addressed on a case by case and site by site basis, strongly influenced by location.

Issue 28 – Policy SG11 – Is the policy consistent with national guidance in Circular 01/2006 and regional policy and are the

criteria appropriate to ensure that local needs are met within the plan period ?

- 3.146 The joint Gypsy and Traveller Accommodation Assessment (April 2008) (CS/S6.7) for Birmingham, Solihull and Coventry was carried out in accord with para 33 of Circular 01/2006. It confirms that, subject to the refurbishment and remodelling of the existing site at Siskin Drive to provide larger pitches, there is no additional requirement in the city until 2017 at least. This work is now underway demonstrating compliance with regional policies.
- 3.147 The policy also contains suitable and appropriate criteria, consistent with those set out in para 58 of the Circular, against which any further proposals should be judged. Accordingly, I am satisfied that it is sound and should help ensure that local needs are met over the plan period.

Issue 29 – Policy SG12 – Is the policy consistent with national guidance in PPS 3 and appropriate to meet local need and/or should there be references to minimum [or maximum] densities, including potentially in particular areas according to public transport accessibility levels ?

- 3.148 PPS 3 requires that efficient use should be made of land and sets a national minimum density guideline of 30 dwellings per hectare (dph) for new housing. In reprising the former and also listing the specific local factors to be taken into account, I am satisfied that the policy is consistent with the most directly relevant national guidance, as the 30 dph standard does not need to be repeated.
- 3.149 I acknowledge that the nature of the existing housing stock, with its preponderance of smaller terraced units within a compact urban form, is a locally distinctive feature of the city. Whilst it is important to maximise the number of new houses delivered over the plan period from PDL sites, this should not be at the expense of high standards of design and layout, as required by PPS 1. This would include in terms of open space provision and the creation of safe, healthy and accessible environments in all new development, as well as integration with the established character and appearance of an area, in accord with PPS 3 (paras 13 and 16).
- 3.150 Similarly, in the Coventry context, I accept that the objectives of improving the overall stock, by enhancing the mix of size and type, and making the best use of the PDL available, to reduce the amount of land needed from the GB, would be best balanced through a flexible (and design led) approach to new housing densities. To that end, the imposition of specific minimum or maximum density standards, either across the city or in any particular areas, is likely to prove counter productive, as well as unnecessarily prescriptive.
- 3.151 Notwithstanding the above, it seems to me that the AAP is the appropriate place to address the issue of density in more detail for

the city centre, in order to take advantage of its high public transport accessibility levels in the interests of sustainability. This should help maximise the contribution that redevelopment schemes make to the city's new housing needs over the plan period. In addition, I consider that the Council should give particular attention to policy CF6 of the emerging RSS Phase II Review in the detailed implementation of policy SG12 as it relates to locations well served by public transport across the city for the same reasons. Nevertheless, I am content that no particular changes are required to this policy or its supporting text for it to be sound.

Issue 30 – Policy SG13 – Is the policy consistent with national guidance and appropriate to meet local needs and how will the additional student households in potentially unsuitable locations be “discouraged” ?

- 3.152 The Council's Student Accommodation Study (2005) (CS/S6.10) shows both the advantages of purpose built student housing close to the universities and the disadvantages of over concentrations of student numbers in established neighbourhoods, in social and economic terms. Accordingly, it is essentially common ground that the first part of the policy is to be welcomed, not least for its likely contribution to regeneration in areas close to the city centre.
- 3.153 Despite the desirability of achieving a balance, the second part of the policy seeking to “discourage” additional student households in certain areas is more problematic. This is partly due to the limitations of Council control over the occupation of existing housing. The policy can only realistically apply to new student housing or where permission for a change of use (or a licence under other legislation for a house in multiple occupation) is needed.
- 3.154 However, where this is the case, proposals should meet all of the relevant criteria to be acceptable not just only or any one. Thus, to be more effective, the second part of the policy should read as follows: “New student housing will not be permitted in areas where there is a significant amount of purpose built student accommodation and/or where the proposals would materially harm a) the amenities of occupiers of nearby properties or b) the appearance or character of an area or c) local services.”.

Issue 31 – Are the relevant monitoring indicators and targets for new housing delivery clear and appropriate for the task ?

- 3.155 National Indicators 154, 155 and 159 are included, together with the number and percentage of new units built on PDL compared to the regional target and of affordable and executive housing. As a result, the CS monitoring proposed in Table 6 should provide the Council with the relevant information on which to properly assess the performance of policies SG6 to SG10 inclusive. Similar conclusions apply in respect of policies SG11 and SG12, with the

former based on an agreed regional target and the latter national guidance in PPS 3.

3.156 I have however made recommendations under Matter 7 in respect of the indicators and targets for policy SG13, on student housing, to reflect not only conclusions about the policy itself but also the need to focus on specific targets, rather than general aspirations. Otherwise, I am satisfied that the monitoring indicators and targets relating to housing are sound.

Recommendations

The following changes are required to make this part of the CS sound:

Para 6.45 – omit as an unnecessary repeat of national guidance.

Para 6.59 – omit “(Study)” from line 2 – repeat.

Policy SG13 – reword second part as follows: “New student housing will not be permitted in areas where there is a significant amount of purpose built student accommodation and/or where the proposals would materially harm a) the amenities of occupiers of nearby properties or b) the appearance or character of an area or c) local services.”.

Matter 4A – Green Belt [General]

Issue 32 – Does the available evidence demonstrate that there has been sufficiently detailed consideration of the need to remove land from the GB in the city, including the further analysis envisaged in the Joint Sub Regional GB Study ?

- 3.157 The starting point in any analysis of whether land in the GB should be identified for new development is the national guidance in PPG 2, including that (paras 2.6 and 2.7) to the effect that boundaries should only be altered in “exceptional circumstances”. The overriding need for new housing to meet the up-to-date RSS requirements, as endorsed by the RSS Panel Report (Sep2009), provides that necessary “exceptional” justification, in the context of the relatively densely developed built form of the city being unable to bring forward sufficient opportunities on PDL. I am therefore in no doubt that a thorough review of the GB boundary in and around Coventry and of potential sites to sustainably accommodate new development is essential as part of this CS process, if the RSS new housing requirements are to be met over the plan period.
- 3.158 Numerous respondents question the basis, methods, analyses and outcomes of the various GB studies undertaken for and by the Council in connection with the CS. For my part, I note that the two most comprehensive and influential ones, in terms of the site choices ultimately pursued, that is the Coventry Green Belt Review (CGBR) (Dec 2007) by DLS Planning (CS/S7.8) and the Joint Sub Regional Green Belt Study (JGBS) (Jan 2009) by Smith Stuart Reynolds (CS/S7.7), were undertaken by reputable consultancy firms, independent of the Council. They were also carried out to objectives and methods agreed jointly with the neighbouring authorities. Such agreements would not have been made and/or the reports not accepted if any of the Councils involved had considered that the studies were not comprehensive, properly constituted and objective in their analysis and conclusions.
- 3.159 The Council’s own subsequent work relating directly to the CS as reported in Annex 1 and 2 to the latter (CS/S7.9) was therefore properly directed largely to the already identified “Least Constrained Parcels” in the GB. This also took into account the considerable additional information provided by the wide range of further technical studies, covering such matters as flood risk, biodiversity, green space and landscape, amongst others, as listed in para 9.7 of the Council’s Housing Topic Paper (CSTP0.1), to provide a more detailed analysis of sites, as required.
- 3.160 In so doing, I am satisfied that the five purposes of including land in GBs, as set out in para 1.5 of PPG 2, and the relative contributions of the various areas of land to meeting them were properly taken into account at each stage. Nor do I accept the view that the differing conclusions reached in the two main independent reports about certain sites, notably land at Eastern Green, are

evidence of fundamental flaws in either process, practice and/or product. They were completed by different consultants using slightly different techniques and with slightly different purposes, partly due to their different timings within the overall CS process. I would therefore expect some differences, as it would be potentially indicative of a lack of independence and/or impartiality if all the conclusions in the later studies merely followed those in the former ones. This would be particularly so when additional layers of relevant and more detailed technical information were being added in at each stage. The same applies to my own conclusions in respect of some of the allocated and "omission" sites where I differ from the Council, partly as a result of additional evidence that has emerged through the examination process in some cases.

- 3.161 I am therefore satisfied that the available evidence provides a robust and credible justification that the Council's overall review process of sites in the GB to find new housing land was thorough in terms of coverage and the consideration of reasonable alternatives. It was sufficiently detailed to properly inform the strategic choices that have emerged over time into the submitted CS. Moreover, it was clearly based upon an appropriate interpretation of the five purposes of including land in the GB, at each stage, and of the potential detailed suitability of the various locations, taking into account the comprehensive technical information available.
- 3.162 In particular, I confirm my agreement with the conclusions of the Council, supported by the RSS Panel Report, regarding the land to the west of the existing urban area of the city, presently separating Coventry from Solihull and Birmingham (the Meriden Gap). This is to the effect that major development here would substantially reduce its largely open character and appearance and appear as urban sprawl by encroaching into the countryside in this sensitive and strategically important gap. Consequently, it should not be removed from the GB or reserved for future development. Overall, I conclude that the CS is sound in respect of this issue, subject to my site specific and detailed policy wording recommendations.

Issue 33 – In the light of the above, has the supply of suitable GB land within the city been maximised or, if not, have potential sites been rejected without good reason[s] ?

- 3.163 Coventry is unusual in that there are two distinct types of GB in and around the city, essentially comprising areas of peripheral open countryside and narrow open space corridors within the existing built form termed green wedges. In relation to both types of GB land, I am satisfied that the extensive evidence base on this matter demonstrates that all potential sites have been assessed, including down to the level of minor boundary realignments on school playing fields to facilitate education redevelopment schemes. Irrespective of my individual conclusions on the suitability and sustainability of some sites, I am entirely satisfied as to the consistent, complete and comprehensive nature of the various GB and related studies

undertaken during the preparation process of the CS and their valuable contributions to the eventual choices identified therein.

- 3.164 The fact that all representors, both supporting and opposing the allocation of sites, have been able to compare and contrast the conclusions reached in their comments indicates that no possible GB locations have been entirely overlooked. This reinforces my conclusion that, whatever their prospective advantages and disadvantages, there are no obvious areas of GB peripheral land around the city that have not been assessed in the CS process for their development potential. The outcome of that assessment in relation to specific sites and areas, including land at Eastern Green, is necessarily addressed separately elsewhere in this report. However, I conclude on this issue that, in general terms, the supply of suitable GB land within the city has been maximised, albeit my recommendations address some site specific changes.

Issue 34 – Are there any such sites that should be reconsidered and why ?

- 3.165 All the proposals about specific sites promoted as also suitable for release from the GB and development, together with the Council and other interested parties responses thereto, are dealt with individually elsewhere in this report. This includes the revised proposal at Walsgrave Hill Farm (Site 7, Table 3 in the CS) where the Council agrees in principle that the site is suitable for development, subject to an amendment to the GB boundary.

Matter 4B – Cross Border Housing

Issue 35 - Are the implications for cross border housing consistent with regional policies, including the RSS Phase II Review ?

- 3.166 Although the approved West Midlands RSS lists Coventry as a MUA, and therefore a focus for new development, it is clear that other policies, notably CF3, oppose expansion beyond the existing built up area of the city. However, the RSS Phase II Review, as fully endorsed in the RSS Panel Report (Sep 2009) following Examination last year, envisages that new housing development adjacent to the settlement but across local authority boundaries may well be one of the most sustainable forms of new development for the city to help meet agreed sub regional housing needs.
- 3.167 In the case of Coventry this is specifically acknowledged in a footnote to Table 1 in Policy CF3. It has been directly endorsed in the RSS Panel Report, following detailed examination debates, to the extent that particular locations on the edge of the city have been identified therein. These are considered to be consistent, in principle, with the sub-regional strategy of focussing most new housing in the north/south corridor, centred on Coventry. This approach derives directly from a consensus reached by the eight Councils making up the CSW Forum (CS20) for the sub-region as an input to the RSS Examination in 2009. Consequently, the RSS Panel Report at para 3.89 confirms that around 3,500 new dwellings each should be provided in Nuneaton/Bedworth (near Keresley) and in Warwick (in the vicinity of Gibbet Hill/Finham).
- 3.168 Moreover, part d) of new policy SS8, in particular, as the RSS Panel Report recommends, confirms that the GB boundary should be adjusted to “facilitate urban renaissance and growth on a north/south axis”, in respect of both districts, as well as in the city itself. Furthermore, in recommending a consistent phasing policy across the region, the Panel Report requires first priority to the reuse of PDL in sustainable locations but also that greenfield urban extensions involving GB boundary amendments be brought forward in CSs for the city and the two adjoining districts on the north/south growth access (i.e. Warwick and Nuneaton/Bedworth).
- 3.169 Therefore, I conclude on this issue that the CS and its implications for cross border housing are entirely consistent with the most up to date version of the RSS, as set out in the Panel Report (Sep 2009), albeit not as yet formally approved by the Secretary of State. In my judgement, any lack of consistency with the effectively out of date policies of the former RSS does not undermine that conclusion in all the current relevant local circumstances. This includes the need to assist the recovery of the city and sub-regional economy from the effects of the recent recession.
- 3.170 Moreover, cross border GB land releases are not envisaged until the second half of the plan period and only then if they actually prove

to be needed to meet Coventry's housing requirements, with a priority to maximising opportunities on PDL in the city first. This allows for an adequate lead in time so that all possible site specific implications and infrastructure requirements may be fully taken into account in the preparation of more detailed schemes.

Issue 36 – Is the evidence to justify the quantity and location of the cross border new housing sought robust and credible and is it the “least worst” outcome in terms of impact on the GB ?

- 3.171 The focus on the north/south corridor as the most suitable and appropriate location for cross border new housing to help meet Coventry's needs derives directly from the sub-regional strategy agreed by the relevant local authorities in the RSS Phase II Review. It has recently been strongly endorsed in the RSS Panel Report (recommended policy SS8) as the most sustainable and practical option, given the level of need, particularly with the importance of retaining the vulnerable Meriden Gap on the western side of the city also taken into account. This element of the CS is also justified by the JGBS (CS/S7.7), which identified suitable opportunities within Warwick and Nuneaton/Bedworth districts to fulfil the strategy, based on a clear and consistent assessment of alternatives.
- 3.172 I therefore share the conclusions of the RSS, the RSS Panel Report and the Council that the location of new cross border housing in those districts and close to the city is the most sustainable and “least worst” outcome in terms of impact on the GB, rather than in Solihull or Rugby districts. The progress to date of the Warwick CS and, to a lesser extent, the early work carried out so far on the Nuneaton/Bedworth CS reinforces this conclusion. Nevertheless, the CS itself is actually less location specific than the RSS Panel Report on cross border housing, which is entirely appropriate as any more detail might act to prejudice the outcome of those other CSs.
- 3.173 As to quantity, the judgement that the two districts should accommodate about 3,500 new houses (about 10%) each of Coventry's new housing requirements over the plan period also relates back specifically to the agreed sub-regional strategy, now incorporated into the RSS Phase II Review and fully endorsed in the RSS Panel Report. In general terms, it is based on not only the detailed assessment of the realistic opportunities for new housing within the city in the SHLAA (CS/S6.5), including on greenfield and GB sites, but also the need to ensure the continuing availability of sufficient employment sites to meet RSS policy requirements.
- 3.174 The retention of green wedges that make an important contribution to the environmental quality of the city and the need to protect the sensitive Meriden Gap are also relevant factors. The fact that sites outside the present city boundary may well be more sustainable and suitable for new development over the plan period than some within is specifically recognised in the RSS Panel Report.

- 3.175 Despite its comprehensive coverage, the clear evidence in the SHLAA confirms that the scale of growth allocated to Coventry in the RSS Phase II Review is such that there are not enough suitable and available sites to provide all the necessary new houses within the city. Indeed, even if that were not the case, the strategic focus on the north/south axis, deriving directly from the RSS as endorsed in the Panel Report, indicates that sites should be assessed on a consistent and comprehensive basis, irrespective of local authority boundaries. I consider that this has been done in the various GB studies, including in terms of their comparative sustainability.
- 3.176 I acknowledge that density assumptions have an influence on the overall numbers of new dwellings expected to be delivered in the city and clearly it is generally appropriate, in accord with national guidance in PPS 1 for example, to seek higher densities in areas with good accessibility to public transport services, such as the city centre. However, as I understand it, the Council's estimates in the CS are based not only on previous experience of local redevelopment schemes incorporating mixed uses, but also other policy objectives. These include delivering a wider mix of size and type of dwellings across a city that has a marked preponderance of smaller terraced units at present and retaining/improving urban open space provision. It is not therefore realistic to expect that the identified need for new housing sites outside the present built up area could be obviated simply by requiring higher densities everywhere else in the city to compensate.
- 3.177 Although I have recommended some changes to land allocations, often for site specific and/or deliverability reasons, it remains the case that the overall evidence base to justify the need for the approximate quantity and general location of new housing development in the adjoining districts of Warwick and Nuneaton/Bedworth is robust and credible. Moreover, the available evidence demonstrates to my satisfaction that it represents the "least worst" option in GB and overall sustainability terms also.

Issue 37 – Do the emerging CSs of Warwick and Nuneaton/Bedworth confirm commitment to meeting part of Coventry's housing needs and what are the alternatives and contingencies if this is not delivered as envisaged ?

- 3.178 The emerging CS for Warwick accepts the need to reverse the decline in population in the region's MUAs, such as Coventry, and the unsustainable growth trends in the more rural districts, such as Warwick. It also endorses the RSS concept of a north/south growth corridor, focussed on Coventry, and that the release of GB land outside the city, albeit as a "last resort" and towards the end of the plan period, is necessary to meet the overall new housing requirements supported in the RSS Panel Report (Sep 2009).
- 3.179 Given the acknowledged strategic importance of the north/south growth axis, it is clear that any such GB land releases should be in

Warwick and Nuneaton/Bedworth districts, rather than Solihull or Rugby. In line with the RSS Panel Report, the work carried out so far on the Warwick CS indicates that potential sites are available adjacent to or in the vicinity of the city capable of providing in the order of 3,500 new dwellings over the plan period.

- 3.180 At present, land at Finham/Gibbet Hill appears the most suitable, with the potential to provide a new rail station and Park and Ride facility on the Coventry/Leamington Spa line that would also help serve the University of Warwick. Clearly, the final selection is a matter for the Warwick CS and I was made fully aware of the strength of local feelings and extent of specific concerns against the Finham proposals at the Examination. Nevertheless, nothing leads me to conclude that it would not be possible for Warwick district to accommodate the share of Coventry's new housing allocation previously agreed via the RSS process, whether at Finham or an alternative location. I am therefore satisfied that this element of the city's new housing requirements has reasonable prospects of delivery over the plan period.
- 3.181 Matters are less clear cut in regard to Nuneaton/Bedworth where the CS process is not as far advanced as in Warwick and a SHLAA has not yet been completed. Despite supporting the strategy at the RSS Examination and examining options in its early CS work, that Council is, apparently, no longer committed to accommodating around 10% of Coventry's new housing growth in its district over the plan period. As I understand it, this arises partly from concerns over the cost and extent of necessary improvements to local infrastructure, including at J3 of the M6 and the NUCKLE rail scheme, as well as the potential coalescence of settlements, flooding and motorway noise.
- 3.182 However, the relevant strategic issues have already been thoroughly examined via the RSS and, assuming that the Secretary of State endorses the Panel Report, the Council will be expected to examine these issues in full as part of their CS process and to identify the most suitable strategic site or sites for development to meet this requirement. Consequently, I consider that the RSS provides the necessary commitment to meeting the previously agreed share of the city's growth in Nuneaton/Bedworth over the plan period for the Coventry CS to proceed on that basis.
- 3.183 In my judgement, the Coventry CS is entitled to rely on the sub regional consensus in relation to the overall level of new housing to be provided in and around the city and in relation to the strategic focus on the north/south growth axis. Should this prove not to be the case, the City Council will have to review the CS and/or identify alternatives to meet the new housing requirement in accord with the "plan, monitor and manage" approach and in the light of progress on delivery elsewhere in and around the city as revealed in the AMR. The fact that the "cross border" elements of the new

housing requirement are programmed for the second half of the plan period in any event provides flexibility and for this possibility.

- 3.184 Consequently, I am able to conclude that, notwithstanding the remaining level of uncertainty regarding cross border housing provision, notably in Nuneaton/Bedworth district, the overall reliance of the CS on around 20% of the new housing requirement for the plan period being provided outside the present city boundary does not make it unsound in principle.

Issue 38 – What are the implications of reliance on cross border housing delivery in terms of infrastructure (e.g. road and rail links to the north and south), phasing (including in relation to the city's housing trajectory) and availability of services, including education/health ?

- 3.185 The RSS examination tested the infrastructure requirements of the sub-regional strategy in the light of an implementation programme endorsed by the constituent local authorities and prepared in conjunction with the relevant delivery agencies, including GOWM and AWM. In common with the RSS Panel, I too consider that improving public transport services, notably the NUCKLE 1 & 2 rail schemes, in the north/south corridor, is a key element in the successful delivery of the sub-regional strategy.
- 3.186 This is particularly so in relation to the provision of cross border housing in Warwick and Nuneaton/Bedworth districts on a sustainable basis but will also assist such delivery in the city. The work done to date in connection with the Warwick CS indicates that the new infrastructure provision likely to be required in connection with major housing development on the edge of Coventry should be deliverable without excessive cost, albeit on a phased basis. The likely proximity of new developments to the present built up area of the city should also facilitate the most effective and efficient use of existing infrastructure, including of education and health facilities. Moreover, where new or improved services, including retail provision, are necessary both the scale of new development envisaged and the close relationship to the city should enable joint comprehensive analysis, planning and funding to ensure delivery on an appropriately phased basis.
- 3.187 Again, the fact that major new developments on peripheral greenfield sites are only anticipated in the second half of the plan period provides the necessary lead-in times, as also recognised in the RSS Panel Report (para 4.18), for infrastructure provision. Accordingly, I conclude on this issue that the continuing priority to urban regeneration first, including in respect of the city centre, encompassed in the CS and deriving directly from the RSS should enhance the reasonable prospects of the necessary infrastructure being developed to support the envisaged cross border housing in the second half of the plan period. This would include in terms of transport, health, education and other services/facilities.

Matter 5 - City Centre [Policies SG19 and SG20]

Issue 39 – Does the CS provide suitable guidance and policies for the improvement of the city centre and the preparation of a future Area Action Plan [AAP] consistent with national guidance in PPS 6 [now PPS 4] and regional policies ?

- 3.188 No one disputes that Coventry city centre urgently needs new investment to improve its retail offer and range of other uses, in order to properly fulfil its sub-regional role and make its full contribution to the local and regional economies. Given the present form and layout, largely deriving from the post WW2 rebuilding of the city, it is also common ground that a major redevelopment scheme or schemes, such as outlined in the recent Jerde Masterplan (CS4) (2009) for the current retail centre, is required to achieve the desired transformation.
- 3.189 Amongst other public bodies, Advantage West Midlands (AWM) confirm that there is a consensus of sub-regional support for an expanded city centre to focus retail, office, educational, cultural, leisure and new housing growth and improve its overall prosperity and economic contribution, given the current under-performance. This is reinforced by identification as an "Impact Investment Location" (IIL) and regional funding priority, including a significant programme of city centre regeneration. This is supported by an emerging City Centre Area Action Plan (CCAAP) that incorporates the Jerde Masterplan for the redevelopment of the retail centre.
- 3.190 In common with most others who have commented, I am entirely satisfied that the CS sets out an appropriate overall vision and framework for the essential changes to the city centre. It also takes full account of the key messages arising from public consultation in relation to the aspirations of the local community. In my view, it is consistent with both the previous PPS 6 and the relevant elements of the RSS, as well as the new PPS 4, and provides an appropriate lead for the subsequent CCAAP that will "put the flesh on the bones" in terms of site specific details.
- 3.191 In particular, the anticipated levels of new retail space, offices and housing units identified in the CS over the plan period should help enable significant redevelopment opportunities to come forward, on an economically viable basis, in the expanded city centre. With regard to housing, there has been no evidence brought to my attention to cast any material doubt on the Council's estimate that around 6,000 new dwellings can be provided across the central area over the full timescale of the CS. Through the identification of sites in the AAP, the draft of which has now been published, I consider that there is a reasonable prospect at least of this element of the city's new housing delivery being achieved as proposed.
- 3.192 Overall, I therefore conclude that the CS provides suitable guidance and appropriate policies for both the improvement of the city centre

in general and the emerging AAP in particular that are consistent with national advice in former PPS 6 and the relevant policies of the RSS. Although prepared before the publication of the new PPS 4 – “Planning for Sustainable Economic Growth” (Dec 2009), I am also entirely satisfied that the policies and proposals of the CS for the city centre are consistent with the purposes and provisions thereof and should help significantly to improve the economic performance of the city as a whole.

- 3.193 The CCAAP will clearly need to address flood risk issues in a Level 2 SFRA in greater detail than has been the case so far in the Level 1 SFRA for the CS, including in relation to the proposals for the Swanswell area. Nevertheless, and particularly in the absence of any major problems identified to date, I am satisfied that this is appropriate in all the relevant local circumstances, rather than being needed before the AAP is started for example. Similarly, concerns expressed by the EA regarding increased loads on the foul sewer network from more new housing in the city centre relate to matters of relative detail, not appropriate or necessary to be dealt with in a CS, particularly where an AAP for the relevant area is already well underway. Moreover, I see no real need to add specific references to “enhancing the natural environment” or “including sustainable design principles” into policy SG19, as it is essentially an enabling policy for the more detailed proposals in the AAP and relevant national guidance expects that such matters would be taken into account in any event.
- 3.194 In the light of all of the above I consider that both policies SG19 and SG20, together with their supporting texts, are sound and require no material changes. However, three minor wording amendments would assist clarity. Firstly, all the evidence, including the SCS 2008 update (CS/S3.1) suggests that a need for Shopping Expansion Areas will arise outside the present Primary Shopping Area within the plan period. Thus, the first part of the first sentence of para 6.95 is unnecessarily cautious and should be deleted so that it starts “The most suitable....”. This will also ensure that no potential confusion about these proposals is taken forward into the CCAAP. The second bullet point of that para should also relate to the PSA and not just the Precinct Quarter, for obvious reasons, and should be changed accordingly. Finally, the first sentence of para 6.96 need not equivocate about the inclusion of peripheral residential areas and leisure uses and “may” should therefore be changed to “will” to assist the CCAAP and be consistent with the use of language elsewhere in this section.

Issue 40 – Is the proposed extension of the city centre boundary soundly based and justified by the evidence in terms of potential impact on the rest of the city centre ?

- 3.195 The overall strategic importance of significant improvements to the city centre and the targets for new retail, offices and housing expected to be met there both help to provide a justification for the

expansion of the city centre beyond its currently defined area. Moreover, the constraints imposed by the rail line to the west, the need to promote regeneration in the north, accommodate major developments by Coventry University to the east and “break down” the physical, visual and perceptual barrier of the Ring Road all contribute to defining where such expansion should occur.

- 3.196 In such circumstances and particularly in the absence of firm evidence indicating otherwise, I am entirely content that the Council has identified an appropriate new boundary for the city centre and that, in the light of the proposals in the CCAAP, the extensions should complement, rather than harm, the necessary and appropriate redevelopment of the city centre as a whole.

Issue 41 – Should the policies include targets derived from the RSS for new retail and/or office floorspace and identify appropriate locations ?

- 3.197 I note that the Council would have no objection to the specific inclusion of the RSS targets for new retail and office floorspace in policy SG19. However, any such change is not now likely to assist the preparation of the CCAAP, which is already well underway. Had it been otherwise the inclusion of specific figures might have given some particular directions for the AAP to follow, but this no longer seems necessary and has therefore, to all intents and purposes, been overtaken by events.
- 3.198 I am therefore content that the relevant targets and more detailed figures should remain in the supporting text of the policy in this instance. Bearing in mind the considerable progress made to date on the more detailed CCAAP, I also endorse the Council's position that the identification of suitable locations, e.g. for new offices, is best dealt with in the former rather than the higher level CS, where matters of greater detail, including flood risk, can be examined more closely and on a sequential or comparative basis, if necessary.

Issue 42 – Will the monitoring indicators for centres, offices and retail be effective ?

- 3.199 This issue is dealt with under the main section on monitoring.

Recommendations

The following changes are required to make this part of the CS sound: - (in addition to the Council's FPCs) -

Delete “If any further sites beyond the Primary Shopping Area are required” at the start of para 6.95.

Replace “may” with “will” in first line of para 6.96.

Matter 6 – Neighbourhoods [Policies SC1 – SC4]

Issue 43– Are the retail elements of policies SC1 and SC2 appropriate and consistent with national guidance and regional policies, including in terms of the network of centres identified ?

- 3.200 Taking into account the almost universally acknowledged under-performance of the city centre in fulfilling its proper sub-regional role in recent years, including in comparison to other lower order centres, I am satisfied that policy SC1 defines an appropriate and balanced network of centres and retail hierarchy for the city in accordance with new national guidance in PPS 4. I agree that the term “Major District Centre” is apt for both Arena Park and Cannon Park, but no longer for Ball Hill: now a District Centre, due to their wider range of shops and services. Similar conclusions apply in respect of the list of District Centres, including Ball Hill.
- 3.201 Moreover, I am also satisfied that in the current Coventry context, where the urgent need for significant city centre re-development is effectively common ground, it is appropriate that any new proposals for retail or other expansion of the MDCs should be able to demonstrate that they would complement, rather than compete with, the city centre. I consider that the combined application of policies SG14, SC1 and SC2 should be sufficient to achieve the objective of concentrating most new retail and related development in the city centre over the plan period. For the same reason and so as to avoid material harm to the continuing roles of the other lower order centres, I am also satisfied that any new shops proposed elsewhere should be subject to the tests set out in policy SC2, which are also consistent with new PPS 4.
- 3.202 Accordingly, I conclude that only minor changes of wording are required to both policies SC1 and SC2 for clarity and consistency. In the former, the last sentence of part B should say “will” not “may” in line 2 and “where” not “as” in line 3 to be clear as to the Council’s intentions and consistent with part C of policy SC4. In the latter, the second element of point 2 should read “the impact of the proposed development would not be harmful to the vitality and viability of existing centres” to avoid any uncertainty, as in the Council’s FPCs.

Issue 44 – Will policies SC3 and IM1 ensure that new developments provide the necessary elements of community infrastructure, including open space ?

- 3.203 The Council now acknowledges in the FPCs that the second sentence of para 9.20 requires amendment to help clarify the list of community facilities to which the policy would apply and I endorse the amendments put forward as useful. However, the policy wording itself also requires further attention, if it is to be sound, beyond the addition of a reference to “facilities” as well as “sites

and premises” in the second para and replacing “the” with “a” in the first bullet point, albeit they are helpful.

3.204 In particular, without reference to economic viability as a criterion, it would be impractical and essentially unreasonable for the Council to seek to resist the loss of services and facilities run wholly or largely by the private sector and without public subsidy, such as public houses and cafes, in principle. This is particularly so in local circumstances where alternative provision is likely to exist at a reasonable walking distance in a relatively densely built-up city.

3.205 As I see it, there are two options: either the policy contains a further criterion relating to continuing economic viability, in the absence of which a loss could not be reasonably resisted, or the list in para 9.20 excludes such facilities as pubs, cafes and restaurants. Bearing in mind the guidance in new PPS 4 and despite the possible practical difficulties/potential costs associated with demonstrating viability, I consider that the former is to be preferred for certainty.

3.206 The second sentence of para 9.20 should therefore be re-worded as follows: “This includes doctors’ and dentists’ surgeries, indoor sports facilities, community halls including those at places of worship, crèches and day nurseries, public houses and cafes/restaurants, and a wide variety of other facilities.”. The policy itself should be re-worded as follows: “Development proposals that would result in the loss of sites, premises or facilities currently or last used for the provision of community facilities and/or services will be resisted. Their loss will only be accepted if, either, it can be demonstrated that a community use is no longer needed or, economically viable or, ”.

Issue 45 – Is the removal of land from the GB for schools and the NDC area under policy EQ2 justified by the available evidence and consistent with national guidance in PPG 2 ?

3.207 Many of the neighbourhood regeneration schemes across the city referred to in this policy are either underway (e.g. Stoke Aldermoor/Peugeot), committed (e.g. the NDC area), or the subject of current submissions (e.g. Canley). In such circumstances and in the light of the pressing needs of these parts of the city for new investment to help reduce social and economic inequalities, it is not surprising that there are, effectively, no dissenting voices raised to the Council’s continuing commitments to these projects. As a result, I see no reason to disagree with the removal of GB/GW designation from those relatively small areas of land necessary for their satisfactory implementation as exceptional circumstances have been shown to exist. School sites are dealt with separately under issue 66 – policy EQ2 (paras 3.330 – 3.331) below.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs) –

Policy SC1 – in the last sentence of part B replace “may” with “will” in line 2 and “as” with “where” in line 3.

Policy SC 3 - reword second part as follows: “Development proposals that would result in the loss of sites, premises or facilities currently or last used for the provision of community facilities and/or services will be resisted. Their loss will only be accepted if, either, it can be demonstrated that a community use is no longer needed or, economically viable or, “.

Para 9.20 – reword second sentence as follows: “This includes doctors’ and dentists’ surgeries, indoor sports facilities, community halls including those at places of worship, crèches and day nurseries, public houses and cafes/restaurants, and a wide variety of other facilities.”.

Matter 7 – Delivery/Flexibility/Monitoring/Implementation [Policy IM1]

Issue 46 – Bearing in mind the phasing and funding required is the overall strategy economically viable and practically achievable in the timescales envisaged and in the form proposed ?

- 3.208 The Council will not be alone in seeking to deliver the aims and objectives, policies and proposals of the CS. It should be able to rely on the support of the other Councils in the CSWF in terms of the consistent implementation of the agreed, albeit not formalised, sub-regional strategy, as well as other key partners in relation to funding. In particular, the city's October 2006 designation as a NGP provides a continuity of resources for regeneration schemes with the HCA also providing financial support.
- 3.209 Importantly, in my view, AWM has agreed to provide an initial £40 million towards city centre regeneration as part of its recognition of the city as a vital regional Impact Investment Location, in respect of both the City Centre/North and Ansty nearby. Moreover, several key local transport infrastructure projects (such as NUCKLE) have been prioritised in the regional funding allocation. Furthermore, the BSF education programme continues across the city, albeit with funds guaranteed for the next ten years only at present.
- 3.210 The extensive membership of and inputs from the Coventry Partnership also helps to show that the Council has and will continue to work in collaboration with all local service providers. Notwithstanding, it is also relevant that much of the new development anticipated will be within the present built up area of the city and can take advantage of existing facilities and services accordingly, in the main. The varying scale and location of such projects across the city also helps to provide some flexibility in terms of delivery. It also reinforces that the overall strategy is not directly or overly reliant on the provision of one or more major schemes or items of new infrastructure to succeed, albeit city centre regeneration has priority. To my mind this assists the likelihood of eventual delivery of the objectives over time.
- 3.211 Whilst less than ideal, the fact that new Table 5A makes no reference to the proposed eco-suburb at Keresley is, in my opinion, an understandable and acceptable omission in all the relevant local circumstances. The present uncertainty over the timing, let alone the scale, of any new development in that location is such that it would be well nigh impossible to accurately estimate the detailed infrastructure needs of such a project at present and on the information currently available. Accordingly, I am content that it need not be included in the Council's "Infrastructure Programme" that supports the CS and forms part of its evidence base at present. Instead, such matters would need to be comprehensively addressed in the preparation of the AAP that I recommend or, failing that, as part of any Masterplan that may be brought forward in the future.

- 3.212 The above is also relevant to my conclusions in relation to para 10.10 of the supporting text to policy IM1, which I endorse. The introduction of a CIL would necessitate the preparation of a detailed infrastructure programme, including funding sources and phasing of delivery, before it could be imposed in any event. In such circumstances, I am satisfied that the absence of direct reference to the eco-suburb proposal in new Table 5A does not render it or the CS unsound for the reasons given above. Overall, I am therefore satisfied that, in general terms, the strategy and objectives of the CS are viable and achievable as submitted.

Issue 47 – Is the CS sufficiently flexible to enable it to deal with changing circumstances and, if not, what changes/contingencies would improve the ability to respond to new issues arising during the plan period, such as a lack of investment in major projects ?

- 3.213 With the possible exception of the significant, medium term, improvements now assessed as likely to be required at the Finham sewage treatment works, for which practical solutions are available, the CS does not rely on any one specific item or programme of infrastructure being delivered for its overall implementation over the plan period. Even the key pieces of regionally prioritised new transport infrastructure, such as the NUCKLE phases 1 and 2 rail schemes and the A45/A46 road junction improvements, do not represent potential “showstoppers” if not provided as currently programmed. This is because some significant elements at least of the new employment and housing growth envisaged at various locations in and around the city to 2026 could still be safely and reliably delivered on time in their absence.
- 3.214 Given that the implementation of the new CS starts during a significant economic downturn, I consider it appropriate that the Council's initial focus should be on employment land availability, housing delivery and the regeneration of the city centre plus peripheral areas, in particular. Progress on these priorities will inevitably be closely monitored, including by the Council's various public and private sector delivery partners, via the AMR amongst other sources. This should provide the opportunity to bring forward other sites, including reserved land in the GB, if and when needed and when it will reinforce or assist, rather than compete with, the regeneration of the city centre and other areas first. Such an approach inevitably embeds an element of flexibility.
- 3.215 I fully endorse the Council's judgement on the vital importance of early progress on improving the city centre. However, even this is not reliant on just one project or programme alone (not even the Jerde Masterplan) and is capable of being achieved in phases over time, as the necessary resources become available. As a result, I am satisfied that, overall, the CS is reasonably flexible in accord with para 4.46 of PPS 12. Thus, it should be able to respond to changing circumstances, including a lack of investment in any

particular major projects from any specific source accordingly. Two minor wording changes are required to para 10.11 to provide clarity and certainty as a constraint identified can no longer be “unforeseen” and there can be no doubt that new development schemes will be expected to contribute to commensurate new infrastructure provision.

Issue 48 – Will the monitoring proposed be sufficiently comprehensive and informative to achieve its objectives ?

- 3.216 Taking the revised Table 5A (CSTP 03) and Table 6 together, it is clear that the monitoring proposed would involve a mix of Core Output indicators, derived from national guidance, and a number of local ones related more directly to the specific CS objectives for the city. In particular, the annual assessment of new housing delivery and land supply in the AMR will form a vital component of any judgement on the need (or otherwise) for any of the reserved land in the GB to come forward for new development. This will have to bear in mind the necessary lead in times before new units are actually completed on site. Similar considerations would apply in the event of an identified shortage of employment sites to meet the city's agreed share of the sub-regional requirement and keep a range of size and type of land and buildings available at all times.
- 3.217 I consider the indicators used to be appropriate for their purpose in most instances, including in terms of consistency with national guidance and regional monitoring output. However, for the sake of clarity and completeness, the Council should add the latest available figures, even if only broad estimates, to “Costs” in Table 5A in respect of NUCKLE phase 2, footpaths and cycleways, water supply, sewerage and the new EfW plant. Some of these costs, including for the EfW plant and water supply at Stoke Aldermoor, were made available at the examination. More importantly, if the Council wants to introduce a Community Infrastructure Levy (CIL) at any stage it will be necessary for all relevant estimated new infrastructure costs to be publicly available and taken into account when setting the prospective levels to be imposed. The same applies to any elements of social and/or green infrastructure that the Council wishes to help fund through a CIL.
- 3.218 In terms of Table 6, in addition to the Council's FPCs, the target set out for policy SG14 should also be applied to policy SG15, as no other is currently provided or relevant. In relation to policy SG13 (student housing) and taking into account the changes to the policy wording referred to elsewhere in this report, it is necessary to have rather more specific targets if monitoring is to be meaningful. For it to have an impact on public perception of the issue, the target should be ambitious but realistic. I therefore recommend that both targets should have “by 20%” added at the end. This is roughly equivalent to a change of 1% per annum over the plan period and therefore reasonably achievable in practice, in my opinion.

3.219 For policy SC3, I consider the indicator and target to be somewhat confused, as written. In my judgement, the overall policy objective is to preclude the loss of facilities that serve the local community and therefore the target should reflect this aim. However, if a particular facility is replaced elsewhere then it is not lost, and if redundant or economically unviable it cannot or will not continue to operate in any event. Thus, I consider that in order to realistically measure the outcome of the policy in relation to community facilities, the indicator should also refer to those that are “not replaced or proved to be redundant”, whilst the target should be “no net loss”. I recommend accordingly. Subject to the above I conclude that the CS monitoring proposed would be adequate and sufficient to help achieve its objectives.

Issue 49 - Are the implementation mechanisms sufficient and suitable to achieve the objectives ?

3.220 The Council's FPCs include the addition of the “Programme of Delivery” to the “Relevant Evidence Base” on p.113 of the CS. This incorporates appendices listing details, including costs and funding sources, of 1) city centre schemes, 2) citywide projects, and 3) the status of current investment proposals. In my view, this important and detailed information completes the robust and credible evidence base necessary to demonstrate that the necessary measures, methods and mechanisms are available to the Council and its delivery partners to implement the CS over time.

3.221 Starting with the objectives, each of which is now directly linked to the relevant delivery policies, and moving through the main elements of new infrastructure to be provided (now Table 5A) to the identified targets and key indicators for monitoring (Table 6), I am content that an appropriate basic framework for their achievement is provided in the CS, as amended by the Council's FPCs and my recommendations. Consequently, I conclude on this issue that the various implementation mechanisms set out are sufficient, suitable and satisfactory to facilitate delivery as envisaged.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs)

Para 10.11 – replace “future, unforeseen” with “possible” in line 9 and omit “it would be expected that” in line 15.

Table 5A – Infrastructure Programme (replaces Table 5 – Implementation Plan) – add missing cost estimates for NUCKLE phase 2 [£15.8M - Capital], Footpath/Cycleways [£15–22M - Capital], Water Supply (removal of pressure reducing valve at Stoke Aldermoor) [£4–5M Capital], Sewerage [£4.3M Capital], Flood Prevention (specific schemes) [£4-5M – Capital], Flood Prevention (general) [£4-5M – Capital], Electricity/Gas/Telecoms

– [Site Specific], EfW plant [£210M - Capital], Higher Education [£460-560M] and Secondary Education [£350M].

Table 6 - add “not replaced or proved to be redundant” to indicator for Policy SC3 and amend target to “no net loss”.

Add by “20%” to both targets for policy SG13.

Repeat target for policy SG14 for policy SG 15.

Matter 8A – Keresley

Issue 50 – Is the location and siting the most suitable and appropriate for a new community and, if not, why not – for example are there any significant physical, environmental, ecological and/or infrastructure constraints ?

- 3.222 The CS is based on an agreed sub regional strategy that seeks to focus growth on a north/south corridor with Coventry at its centre. The fairly tight existing urban form of the city also means that it is not possible to identify enough land to meet Coventry's identified share of that growth on PDL. Consequently, in the absence of sufficient alternative sites outside it, the release of land in the GB has had to be considered for the second half of the plan period.
- 3.223 Clearly, any such releases need to be in sustainable locations, where new development would be well related and connected to the existing built up area and capable of being integrated into local communities. Thereby they should be able to take advantage of existing infrastructure, services and facilities, as well as making new provision where necessary. Keresley, along with Eastern Green, was one of two main "areas of search" to emerge from the initial analysis carried out for the Council in the CGBR (Dec 2007) (CS/S7.8). Based on a comprehensive series of further studies it has now clearly emerged as the area best meeting these criteria.
- 3.224 On a comparative basis with other alternative locations around the city, including Eastern Green, I agree with the Council that it is the clearly preferable choice in sustainability terms. In my view, this suitability is enhanced by its location in relation to the north/south corridor through the city, which is to be a main focus for public transport and other infrastructure improvements backed by regional funding sources over the plan period, as well to the Coventry and Nuneaton regeneration zone. My conclusion is also reinforced by the judgement that an urban extension on this particular edge of the city would not threaten the integrity or material extent of the strategically important Meriden Gap.
- 3.225 Both the CGBR and the JGBS (Jan 2009) (CS/S7.7), conducted by independent consultants, in effect, concluded that Keresley is firstly, suitable in principle and, secondly, the most sustainable location of those available to release land from the GB, if and when needed, to meet the RSS requirements for new housing. The latter identified the area between Tamworth Road and Bennetts Road, in particular, as most worthy of detailed study. These conclusions have recently been endorsed in the RSS Panel Report (para 8.38), providing another independent conclusion that this part of Keresley is the most suitable location for a sustainable urban extension of the city on a substantial scale.
- 3.226 Within the overall identified area it is quite clear that the mainly higher land to the north west is less well suited to satisfactorily

accommodate new built development, in both physical and visual terms, than other parts that are also closer to existing developed areas. It contains some well established woodlands that are important local landscape features and wildlife havens. Provided that these parts are not developed, it seems to me that the identification of this location for a sustainable urban extension of the city would have considerable advantages compared to other possible sites and few disadvantages to be counterbalanced.

- 3.227 In particular, the relative proximity to the existing built up area, including the employment area at Prologis Park and the MDC at Arena Park, the present (and proposed) transport links, including to the city centre and M6 motorway, and the opportunity for major new public open space provision in the form of a Country Park (CP) on the edge of the city are all strong points in favour of this area of Keresley that do not apply so well to other alternatives, if at all.
- 3.228 In the light of all of the above, I conclude that, in principle, this is the most suitable and appropriate siting and location for a sustainable urban extension and new community. The CS is therefore sound in respect of this choice. Nevertheless, it remains necessary to examine in detail if there are any site specific constraints of sufficient importance to preclude or inhibit development and therefore alter this preliminary conclusion.
- 3.229 The EA has advised that although the site falls within a water catchment SPZ, albeit with only a small part within Zone 1 – the inner protection zone, this is not a constraint to development in principle. It is also common ground that the water supply position is satisfactory.
- 3.230 In relation to surface water drainage, the EA confirms that a site wide FRA will be required at the next stage of the planning process, notably to take detailed account of the springs, culverts and watercourses on the site, including the Hall Brook. However, their conclusion is that "there are potential solutions to any flooding problems on the extended site", albeit full "eco town" standards may prove difficult to achieve. This would include a "whole site" SUDS strategy, incorporating retained water features for surface water run-off attenuation as part of a green space corridor along the Hall Brook.
- 3.231 For foul water drainage, it is now clear that the capacity of the Finham works would have to be upgraded to cater for the level of new development proposed in the CS during the plan period. Given that practical options exist to address this issue, I am content that the details of timing and funding of such improvements relating to Keresley is a matter that Severn Trent Water, the Council and the developers can resolve before any planning permission is granted.
- 3.232 I acknowledge the concerns of local residents about the differing impacts on the separate parts that currently make up the wider

settlement of Keresley, as some significant changes are inevitable with a scheme of this scale. However, it seems to me that careful planning and phasing should be able to ensure that their individual identities are not necessarily lost but rather reinforced, including with appropriate physical and other links to new development areas. For example, existing facilities, including schools, could act as social and community hubs, in addition to new provision elsewhere within the scheme, as part of the creation of new neighbourhoods.

- 3.233 Whilst the reference in para 6.40 of the CS is brief, I have no doubt that the provision of social and community facilities commensurate with the scale of development contemplated would have to be made alongside the new houses. This would be in accord with legal agreements, a Community Infrastructure Levy (CIL), conditions attached to any planning permission and/or a combination of two or more of the above. Whether this is by entirely new provision on site, improvements to existing facilities off site and/or, again, some combination thereof would need to be resolved in respect of each particular service. This includes for primary and secondary education to cater for the significant increase in pupils.
- 3.234 Also, the limited local services and facilities in and around Keresley at present might benefit from increased population in their catchment area, in the short term at least. Such links should be encouraged as a contribution to social cohesion and the integration of new residents into the local community. This seems to me to be strongly based and functioning well at present and thus deserving of such support. Similar considerations would apply in respect of existing retail and sports/leisure facilities in the locality.
- 3.235 In nature conservation terms the loss of some and harm to other habitats cannot be entirely avoided in a scheme of this scale and some protected species will also be affected to an extent at least. Nevertheless, all the available evidence suggests that none of the identified Local Wildlife Sites in the vicinity is directly threatened with loss or significant harm. All the ancient woodlands, such as Bunsons Wood, would be retained and, where possible, enhanced, potentially forming part of the proposed CP on the north western part of the overall site.
- 3.236 This would include the necessary active management for conservation purposes that seems to have been lacking in recent years. Once confirmed by detailed site investigations, I am also satisfied that any ancient trees and hedgerows present, including the important one forming the city boundary to the north west of the site that would define the new, firm, and long term defensible boundary of the GB, can be retained and their future protection incorporated into a detailed masterplan at a later date.
- 3.237 Moreover, as para 6.40 of the CS confirms, the overall biodiversity of the land, including as a habitat for certain protected species,

would be the subject of agreed management and maintenance measures for appropriate areas. In a scheme that expects to have 40% of its total area as open space this would apply to all the different types of such areas, as well as in the proposed CP. In such circumstances, I am satisfied both that the existing ecological interest of the site is not such as to provide an overriding constraint to development and that suitable measures would be put in place to retain and, where possible, enhance those elements of interest in the future as part of an overall development scheme.

- 3.238 The loss of productive farmland is unfortunately an inevitable consequence of a major scheme of this nature, including in this case limited areas of grade 2 and 3A quality (the best and most versatile). It may be possible for some agricultural uses, such as grazing, to continue in areas to be set aside for the CP. However, this land would remain undeveloped in any event and, importantly, capable of reverting to such use at some point in the future.
- 3.239 Nevertheless, the sacrifice of an element of agricultural productivity is part of the price that has to be paid to accommodate the new housing requirements for the city deriving from the RSS in a sustainable location in this case. I therefore conclude that this strong established need clearly outweighs the desirability of retaining productive farmland in this specific instance.
- 3.240 In terms of the potential historic and archaeological interest of the land around Keresley, attention has been drawn to various isolated finds and potential areas of interest on parts of the site, including possible moated areas and enclosed ponds. However, nothing is the subject of a formal designation or has yet been confirmed by firm evidence as of real historical value. Given that further detailed site investigations will need to take place prior to the start of any scheme and that a masterplan can incorporate areas to be preserved, I do not consider that there is any archaeological or historical reason to oppose development on this site, in principle.
- 3.241 Both the presence of a high pressure gas pipeline on land east of Bennetts Road and overhead electricity lines across the site from south west to north east, linking into Prologis Park, can be suitably addressed in the preparation of a detailed masterplan/development layout. This could include realignment and/or undergrounding as appropriate, if practical and economically viable. Again, neither represents an overriding constraint to development.
- 3.242 The same is true of the legacy of underground deep mining in the locality. I am advised that the former Keresley Colliery closed in 1996. The relevant engineering advice now is that the use of raft foundations for new buildings, rather than standard ones, should be sufficient to ensure that any potential ramifications of the former mining activities deep under the land are safely and securely addressed. I see no reason to disagree.

- 3.243 There is no firm evidence of any significant soil or land pollution on this site but in the event that any small instances previously overlooked are discovered during more detailed subsequent investigations, I am satisfied that appropriate procedures and techniques exist to resolve the matter in accordance with the relevant legislation to ensure that development may proceed.
- 3.244 I have addressed elsewhere in this report the considerable criticisms levelled at the Council's consultation process for the CS, including in relation to the proposals at Keresley. I need only add here that there was no shortage of comments and contributions from local residents and their representatives on this matter at the examination hearings.
- 3.245 I am particularly aware of the local complaints of a lack of co-ordination with Nuneaton/Bedworth, in relation to potential additional growth on that side of the administrative boundary and adjacent to Keresley. However, in the absence of a submitted CS for Nuneaton/Bedworth, I am only able to directly address the proposals in the Coventry CS, rather than speculate on what may or may not emerge at a later date. The fact that the Coventry CS has been submitted first means that it must be examined in its own right and it is on this basis that I conclude it to be sound in respect of the scheme for Keresley. The implications of any further development in the locality within Nuneaton/Bedworth district and in addition to these eco suburb proposals, would be a matter for examination in connection with that CS.
- 3.246 Local concerns about a lack of clarity from the Council and in the CS in respect of the timing and phasing of development at Keresley were also debated at the examination hearings. I consider that this has been addressed, as far as is possible in connection with land reserved for future development, in my other recommendations. As a result, the smaller sites to be released from the GB should comprise a List 1, due to their likely ability to deliver new dwellings more quickly, when required, with development at Keresley to follow, if and when needed. This should provide some greater certainty for all concerned, in my view.
- 3.247 Similar criticisms about a lack of detail of infrastructure costings to deliver the eco suburb scheme are less easily resolved. In the understandable absence of an agreed masterplan as yet, I accept that detailed calculations are not possible at this stage. Indeed, they are not actually required for a scheme intended to deliver new housing in the second half of the plan period. Any such details prepared now are likely to be potentially misleading as there is a clear risk of their spurious precision being inadvertently relied on later to no one's benefit. Consequently, I accept the current position as satisfactory for now.

Issue 51 – Is the approach of the Council in requiring a comprehensive scheme based on the principles of eco towns appropriate and, if not, why not ?

- 3.248 The proposed development at Keresley does not constitute an “eco town” as defined in the relevant national policy supplement to PPS 1 for the simple reason that it would not be a freestanding new settlement, but rather an urban extension of the city of Coventry. Indeed, the Council specifically sought the removal of Coventry from a government document listing the authorities supporting “eco town” proposals during the examination hearings. Nevertheless, para 3 of the PPS 1 Supplement confirms that similar principles and standards could be applicable to other forms of major new development, such as urban extensions, to make them more sustainable and help achieve the wider objectives of national policy in relation to climate change.
- 3.249 The scale and nature of the scheme contemplated for Keresley, together with the time available to ensure that it is planned sustainably, both point clearly to the conclusion that it provides a good opportunity to implement national guidance in this way. To my mind, the fact that it requires a significant release of GB land to be achieved reinforces the view that this rare chance to create a local example of sustainable development on a greenfield site should not be missed. In this respect, I endorse the Council’s view that the application of development principles and environmental standards akin to those set out nationally for eco towns would reduce the harmful impacts of the loss of open countryside, albeit to only a limited degree.
- 3.250 More importantly, in my view, the high proportion of green infrastructure expected, together with the overall environmental quality of new development would provide material social, economic and health/welfare benefits for new and existing local residents, as well as making a contribution to climate change adaptation. I therefore endorse the requirements of policy SG9 and its supporting text in these respects and see no need for any changes.
- 3.251 Regarding the need for a comprehensive scheme, most respondents, albeit not all, but including many who oppose the proposals in principle, acknowledge that if it is to proceed it should do so on a properly co-ordinated and consistent basis, as the Council intends. This should help to ensure that the necessary services, facilities and infrastructure to accompany such a large scheme are provided at appropriate times and that funding contributions from developers to assist are made on a timely and equitable basis, with or without a Community Infrastructure Levy (CIL) in place.
- 3.252 As a result, in my judgement, there is no place for piecemeal development or the arbitrary release of some areas of land before others, whether according to land ownership or for any other

reason, particularly if standards equivalent to those for eco towns are to be met. Whilst land to the east of Bennetts Road and/or land to the east of Watery Lane could theoretically be developed separately, I take the view that this would act to undermine efforts to deliver a sustainable new community, with all the infrastructure requirements planned on the basis of the total amount of new development envisaged, rather than for individual parts only.

- 3.253 An overall comprehensive scheme, including all relevant sites is essential, in my opinion, to facilitate implementation to appropriate standards throughout and should be pursued, ideally via an AAP. Details of phasing and delivery, in relation to both housing and infrastructure, should be assessed at that stage, rather than as part of a strategic policy in a CS.

Issue 52 –Can the proposal deliver the appropriate density, size and type of new housing, including affordable housing, to meet local needs and to what timescale, as well as providing the necessary services and facilities to accompany new development ?

- 3.254 On a site of this size it should be straightforward to ensure that a range of size and type of new dwellings is built, albeit that some specific areas might be better suited to particular styles of housing than others, depending on access, location and relationship with existing properties, as well as the proximity of other uses. Economies of scale should also assist in the delivery of sufficient affordable housing, alongside normal market provision. The latter would easily incorporate a proportion of executive or larger family, presumably detached, dwellings on more substantial plots.
- 3.255 Given the nature and extent of land available and the absence of any major physical constraints on site, I am equally sure that the average density of new housing across the site should be capable of exceeding the national minimum requirement of 30 dph from PPS 3, without giving rise to any additional harm to the locality or a materially greater visual impact. The SA work done for the main promoter, in addition to that for the Council, also indicates that the same would apply in terms of wider environmental issues too, in respect of higher overall numbers.
- 3.256 I therefore feel confident in assuming that, subject to further detailed analysis at the next stage of the process, the overall scheme would be capable of delivering at least 3,500 and probably 3,600 new dwellings in total, once complete, rather than just the 3,000 initially estimated by the Council. I am thus satisfied that the proposal is readily capable of delivering the right size, type and number of new houses to meet local needs, in principle.
- 3.257 Clearly, the commensurate provision of services and facilities alongside the new houses, and other uses, would also be of considerable importance. It would require robust arrangements to have been made well in advance for providing the necessary

funding at the appropriate time. This would apply whether or not the Council has brought in a CIL by the relevant date and relies on a clear and realistic assessment of the likely delivery of new housing on the site, over time.

- 3.258 The RSS Panel Report (para 8.42) made the point that there is always a significant lead in time required for major developments of this nature. Whilst it may vary by scale and location, as well as the state of the financial markets, in this case it seems likely to fall within the range of 2 years (Council) and 3 years (Main Promoter) estimated at present. This must be taken into account regarding the practical delivery of housing completions, alongside a realistic estimate of the annual maximum number of units that can be built on any one site, irrespective of the number of different developers involved and the percentages sold, leased or rented.
- 3.259 Consequently, it seems to me that it would take a minimum of 10 years construction to complete the total number of new houses anticipated for Keresley and that a decision to permit construction would need to be taken not less than 2.5 years before if it was to be reasonably sure of starting on time. Subject to these conclusions, I am therefore content that the Keresley scheme is capable of delivering dwellings of the size, type and number required to the necessary timetable and at a density above that of the national minimum expectation. Nevertheless, the existing housing land supply and additional allocations made in the CS are sufficient to meet the RSS requirements for the first half of the plan period at least and thus there is no need to bring anticipated commencement further forward by formally allocating the land as a strategic site in the CS now.

Issue 53 – Is the general form, nature and layout of development proposed suitable and appropriate, bearing in mind its role within the city, the need to create a sustainable new community and in the light of national guidance and regional policies ?

- 3.260 The PM, in relation to policy SG9 of the CS, identifies “maximum development parcels” in Keresley, which essentially follow those found to be suitable for the purpose in the JGBS (Jan 2009). The Council’s intention is to ensure that the most vulnerable and sensitive parts of the site, such as woodlands, are retained within the GB, integrated within the development and linked to existing communities via green wedges of land. This would include a green spine along the Hall Brook that would also facilitate a sustainable drainage system.
- 3.261 I fully support these fundamental objectives, including to direct all new built development to the less sensitive parts of the area and retain and enhance, where possible, the environmental assets of the site, for example, by providing better connecting corridors for wildlife. Nevertheless, in a strategic context as part of a CS, such a level of detail seems somewhat over prescriptive. It could even be

counter productive in advance of the necessary further detailed work required to produce a comprehensive master plan for the layout and implementation of development on a co-ordinated basis over the whole site. This is because the ultimate delivery of a sustainable overall scheme, including the vital and extensive new CP with the important woodlands, depends on co-operation between many interested parties, notably all the present landowners.

3.262 Accordingly, all the detailed constraints, opportunities, costs and local interests need to first be analysed on a consistent basis across the whole of the site to inform the masterplan and, especially, the phasing, funding and implementation necessary to deliver it on the ground over time. I therefore agree with the main promoters that the approach followed in the PM amounts to something of a pre-judgement of these important issues and factors. It may even act against the most sustainable solutions being found as a result.

3.263 It also limits the possibility of further public consultation responses on the scheme's details influencing the final form and layout of the site and the nature of development, in the best interests of the local community. In circumstances where the level, scope and extent of public involvement to date has been criticised as insufficient, albeit clearly above the legal minimum, I consider this to be an important consideration for the next stages of the scheme.

3.264 This is not to suggest that the Council's aspiration for at least 40% of the total area as open space be dropped or amended, but rather that scope be retained within the overall site at this strategic stage for final land use choices to be based on all the necessary technical and design work required to produce a fully deliverable masterplan in due course, as well as the results of further public consultation. Nor does it affect the sound concept of a major new CP being provided within the total site. However, such provision does not require that the land remain in the GB, as it would have sufficient protection from inappropriate development through policy EQ3 of the CS in any event.

3.265 Therefore, I conclude that, whilst the general form and nature of development envisaged in the CS is suitable and sustainable, the same cannot be said for the potential layout constraints imposed by the designation of "maximum development parcels" on the PM. These should therefore be omitted. Instead, the entire area north of Sandpits Lane between Tamworth Road to the west and Bennetts Road to the east, up to the city boundary to the north west, as well as land between Bennetts Road, Penny Park Lane and Prologis Park as already identified on the PM should be designated as a reserved site and excluded from the GB in its entirety. This should be reflected in para 6.39 and on the PM.

Issue 54 – Is the impact of the scheme on the character and appearance of the area acceptable in principle and could the scheme be assimilated into the local landscape framework ?

- 3.266 It is common ground that the more rural parts of the parish of Keresley, together with those of Allesley adjoining, currently contain areas of local landscape value that also make a positive contribution to the wider extent of the "Ancient Arden" type countryside on this side of the city. I therefore support the effective consensus that any new development in this locality should retain, and if possible enhance, the most important features thereof, as well as ensuring the continuing maintenance and appropriate management of woodlands in the long term.
- 3.267 The Council's evidence to support the proposals for Keresley in these respects has been augmented by detailed landscape and visual appraisal work for the main promoters, as well as further analysis to help develop a green infrastructure strategy. All of this material demonstrates to my satisfaction that it should be possible, with careful planning and attention to details on the ground, to assimilate a major new development into the local landscape framework hereabouts. In my opinion, this would be principally by avoiding new built development on the higher and visually more prominent land in the north western part of the overall area and retaining (and managing for the future) the areas of existing woodland within and adjoining.
- 3.268 I further agree with the Council that this would probably best be achieved and secured for the long term by the creation of an extensive CP as part of the overall new development scheme. In my view, such provision would be a significant benefit of the project and provide a public facility that would also serve existing residents (of the western half) of the city, just as Coombe Park presently does to the east. However, as I have concluded elsewhere, given that full details of implementation and related matters must remain to be resolved, I see no advantage in seeking to essentially define the exact boundaries of the CP now via the CS, a strategic level document, rather than later following a more detailed examination of all relevant site specific opportunities and constraints.
- 3.269 Based on a 40% overall provision of open space and the essential need to retain existing woodlands, these principles should significantly help ensure that any new development here need not be out of character with the existing form of built development on this edge of the city. Rather, properly planned, it could tie together some of the ribbons of housing that presently extend along roads out of the city into the more open countryside.
- 3.270 It would thereby help to consolidate the somewhat fragmented form of development in Keresley as a whole, thereby limiting its overall impact on the wider landscape in general and the existing character and appearance of the locality in particular. This is one of the reasons that I consider the Keresley proposal on the north west side of the city to be materially different from that relating to land at Eastern Green and others on the western side, as it would not

extend directly into or materially narrow the extent of the Meriden Gap between Coventry and Solihull/Birmingham.

- 3.271 Visual and physical links to the countryside and the “Ancient Arden” landscape beyond could and should be retained and improved, both via the proposed CP in the north west and via other links, such as along the course of the Hall Brook, as referred to in para 6.40 of the CS, which I fully endorse. Existing long distance views from the higher ground to the north west of the site, such as of the “3 spires” in the city centre, could also be retained, especially if it formed part of the new CP.
- 3.272 Taking into account all the supporting text to policy SG9 of the CS but especially that relating to green infrastructure, I am therefore content that, overall and subject to detailed design and layout, the likely impact of the proposals on the character and appearance of the locality would be acceptable in principle. In addition, bearing in mind the public commitment in policy SG9 itself to apply the “Design Guidelines for Development in Coventry’s Ancient Arden” (CS14), and subject to the same provisos, I am also satisfied that the scheme could be successfully assimilated into the local landscape framework.

Issue 55 – Is the scheme realistically capable of providing good transport links to the city and beyond, especially for public transport, and, if not, what are the implications/alternatives ?

- 3.273 The Statement of Common Ground (SCG) (5 Nov 2009) between the Council and the main promoters of the Keresley scheme demonstrates a joint level of confidence in delivering a co-ordinated package of new transport measures to serve the overall level of new development envisaged. In this light, the area’s location, existing road and other links to the city are such that I share the conclusion, set out in para 6.40 of the CS, that it should prove possible, albeit challenging, to cater for at least 50% of all trips generated within the scheme to be made by non car modes.
- 3.274 I note the indication in para 8.14 of the CS that the proposed bus rapid transit project for the city could serve the area in due course. There is also the potential for a rail link between the site and Arena Park/Ricoh Arena, via the existing under used freight line through the adjoining Prologis Park employment site. In my opinion, both would be highly desirable elements of an eco suburb or sustainable urban extension seeking to meet equivalent standards to those set out in national guidance for eco towns. I therefore wholeheartedly endorse the joint commitment in the SCG to fully and actively pursue their provision as part of a comprehensive development scheme for the Keresley area in the next stages of the planning process (whatever that may be).
- 3.275 Nevertheless, I understand the concerns of local residents about the likely traffic generation on the present road network in the locality

arising from this level of growth. However, I am persuaded by the available evidence that this could be satisfactorily addressed by other suitable measures, as set out in the SCG, without reliance on either of those schemes referred to above alone. These would include limited physical improvements, such as the bus gate at the railway bridge on the B4098, new and improved bus services and better cycling and walking links, all as part of an overall Travel Plan.

- 3.276 Whilst final details would have to await a suitable masterplan layout, it seems to me that there are no overriding impediments to the creation of good sustainable transport links to and from the city and beyond, including to J3 of the M6, the city centre and the nearest MDC. Moreover, the current evidence supports the view that the overall costs of the transport improvements envisaged over the plan period need not be excessive or threaten the ongoing economic viability of the scheme if suitably phased.

Issue 56 – Are the implementation and monitoring mechanisms for delivery reasonable and realistic, including in terms of funding and phasing ?

- 3.277 In section 10, the CS already identifies the need for certain vital elements of new infrastructure to accompany development at Keresley, including schools (both primary and secondary), as well as retail, leisure and community facilities and that developer contributions would be required to help provide them. I have acknowledged elsewhere that, given this early stage of a major, comprehensive, mixed use development that is expected (by the Council) to be capable of meeting equivalent “eco town” standards, it is not surprising that further details of implementation, including funding, are incomplete as yet. In all the relevant local circumstances I do not consider this a fundamental flaw of the CS or to render it unsound in respect of the Keresley scheme, partly because it relates to reserved land that will only be brought forward, if and when needed, in the second half of the plan period.
- 3.278 It is also partly because the information that is available so far is generally reassuring about the likely economic viability of the overall scheme, due to its scale and the absence of any obvious “showstoppers”, in terms of major infrastructure constraints. For example, it is clear from the SCG that the Council is content that the likely traffic and transport implications of the scheme can be satisfactorily addressed, albeit with a reasonable and realistic level of funding contributions for local improvements. Based on present evidence at least, similar conclusions apply in respect of all other essential “life support” systems, including foul water drainage and the likely need for material improvements at the Finham works.
- 3.279 It is also the case that more detailed analysis would need to be carried out and final conclusions on funding sources for essential new infrastructure reached, during the next stages of the planning process in any event. Consequently, I am reassured that the work

done to date provides sufficient evidence to conclude, in general terms, that the implementation and delivery of the Keresley scheme is reasonable, realistic and realisable without excessive expenditure and that the CS is therefore sound in this respect. This being so, the monitoring of implementation, as identified in the CS and via the AMR, to be amplified in any future AAP, should not be detrimentally affected.

Issue 57 – Has the proposal been the subject of a suitably comprehensive Sustainability Appraisal (SA) and, if not, why not and what else needs to be done ?

3.280 The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) report (CS0.4) in support of the CS is comprehensive and has been endorsed by a suitably qualified independent consultant. I agree that it fully addresses the requirements of both PPS 12 (paras 4.39 to 4.43) and Sustainability Appraisal of RSSs and LDDs (ODPM 2005) (paras 1.1 to 1.13), including in relation to the proposed eco suburb at Keresley specifically. Although it was based on an original estimate of about 3,000 new dwellings, the main promoters of the scheme have since carried out an update assessing the implications of an increase to 3,500/3,600 new dwellings. From the evidence submitted, I am satisfied with the conclusion of that work that it would not give rise to any significantly different sustainability effects.

3.281 In reaching my conclusion on this issue I have also taken into account that the RSS Phase II Review, from which the proposals for Keresley, including the need to release land around Coventry from the GB, ultimately derive, has also been the subject of a similar process. Both it and the clear potential of the Keresley location in sustainability terms to help meet the new housing requirements have also been specifically endorsed in the RSS Panel Report.

3.282 Moreover, the next stages of the plan process towards the delivery of major development at Keresley would inevitably include further SA/SEA analysis at the more detailed level, whether in connection with a comprehensive AAP, a masterplan or a planning application accompanied by a mandatory Environmental Statement and Environmental Impact Assessment (ES/EIA). I therefore conclude that the SA/SEA report (CS0.4) in relation to the CS is suitable and satisfactory in relation to Keresley and that further SA work is not required at this stage as a result.

Overall Conclusions – Keresley

3.283 I consider it necessary to make clear, particularly for those who made specific representations on the matter, that I do not regard this decision on Keresley as meaning that the land in question will inevitably be developed, and certainly not that it will inevitably be developed immediately. There has clearly been some confusion locally about what the CS actually proposes, possibly arising from

the Council's original erroneous use of the term "safeguarded" in earlier versions of the document, at Keresley. The removal of the land from the GB and the application of the designation "reserved" to it means that the area is identified as a preferred location for new development, if and when there is an overriding need for land that can no longer be met within the present confines of the city. I have also recommended that it should follow the release of other smaller reserved sites that should be capable of delivering new housing more quickly if and when the need arises.

- 3.284 However, it does mean that, having undertaken the appropriate strategic spatial planning processes, which include public consultation, to identify the long term preferred sites, all concerned including the Council, local residents, developers and the providers of services and facilities are fully aware of the choices made and can plan, invest and manage accordingly over time. It is also relevant that the identification of land at Keresley removes both the need to conduct another long expensive and locally divisive site selection exercise in the near future and also any perceived "threat" to other peripheral areas of land that might otherwise have had to be selected, for the plan period at least.
- 3.285 Moreover, as the history of the land to the north of the Jaguar site at Browns Lane demonstrates by local example, removal of land from the GB and identification for an anticipated future development need some years hence does not automatically mean that the site will in fact be developed. Circumstances change and, in the particular instance at Browns Lane, there is no longer an overriding need for the identified site so the land is now being returned to the GB in an undeveloped state via this CS process.
- 3.286 Consequently, I consider it sound for the Council to identify land at Keresley as "reserved", in terms of the PPG 2 definition and as referred to above for potential new housing and associated development in the second half of the plan period. This would also be consistent with the RSS Panel Report (para 4.18) and provide an additional degree of certainty for all concerned with the long term planning of the city and its overall economic regeneration.
- 3.287 It is also important to consider how the development of this major strategic site could be brought forward if and when it is needed. Indeed, the Council has specifically asked for guidance on this matter during the examination and for it to be addressed in this report. The promoters of the scheme say that all relevant matters of detail, including layout and phasing, can be satisfactorily addressed in a masterplan to accompany a planning application. I acknowledge that, even if the Council has an adopted CIL in place at the time of any such submission, there will inevitably be a need for some such document, together with a legal agreement to address matters not covered by a CIL.

- 3.288 More importantly, however, it seems to me highly desirable that if this area is to be developed as an exemplar eco suburb, as currently envisaged by the Council, a comprehensive plan is first prepared in the form of an Area Action Plan (AAP), just as the Council is doing for the city centre. In my judgement, the importance of the potential Keresley eco suburb scheme for the future of the city demands and deserves such attention and analysis before implementation commences. It should be comprehensive, firstly in the sense of covering all the land identified in the CS, whether for potential development or the proposed new CP, particularly given the differing land ownerships.
- 3.289 Secondly, it should be comprehensive by addressing all the necessary service and facility improvements required to support the likely number of new dwellings and associated uses, including those on and off site, such as better transport links. It would also provide the appropriate formal opportunity for full public consultation and the co-ordination of input from all interested parties, including service providers and statutory undertakers, on the detailed layout, composition, phasing and delivery of the overall scheme.
- 3.290 Even under the most pessimistic scenario regarding the delivery of new housing completions elsewhere in and around the city, a “window of opportunity” exists for the Council to prepare an AAP for Keresley, potentially following on from completion of the one for the city centre and before any new dwellings there are needed to help meet the RSS requirements. This would still allow for the necessary lead in time once the AAP is adopted so that the actual delivery of new housing completions need not be delayed thereby.
- 3.291 A formal decision on the preparation of an AAP for Keresley is not within my remit but one for the Council, in consultation with GOWM, to make in due course. However, having been asked that advice on the matter be included in this report, I have no hesitation in stating that, for all the reasons set out above and particularly the scale and complexity of development envisaged, I consider that the next stage in the planning process for a potential eco suburb at Keresley should be the preparation by the Council of a comprehensive AAP.
- 3.292 Overall, I conclude that the only changes required to the CS in respect of Keresley are to omit references to the “maximum development parcels” in para 6.39 and on the PM and to identify the whole area as “reserved” land pending the completion of a comprehensive masterplan (or AAP).

Recommendations

The following changes are required to make this part of the CS sound: - (in addition to the Council's FPCs) –

Amend the Council's FPC adding two new sentences to para 6.39 to start "The boundary has" (been informed by) ... and omit second additional sentence as not necessary.

Identify the entire area north of Sandpits Lane between Tamworth Road to the west and Bennetts Road to the east, up to the city boundary to the north west, as well as land between Bennetts Road, Penny Park Lane and Prologis Park on the PM as a Reserved Site for 3,600 houses excluded from the GB in its entirety.

Omit the designation of "maximum development parcels" on the PM.

Matter 8B – Other Green Belt Sites

Issues 58 – For each site, is it suitable and appropriate for the proposed use and, if not, why not – for example, are there any significant physical, environmental and/or infrastructure constraints ?

Issue 59 – Is removal from the GB, where relevant, justified by robust and credible evidence ?

Issue 60 – Can the proposal deliver the appropriate size and type of housing, including affordable housing and to what timescale as well as providing the necessary services and facilities to accompany new development ?

Land at Cromwell Lane

- 3.293 The submitted CS identifies land in the GB west of Cromwell Lane and south of the railway line and Tile Hill Station on the western edge of the city as a reserved site for new housing, with an estimated capacity of about 390 units. It comprises largely open farmland that slopes gently from south to north, with little tree cover. However, there are some mature specimens along a field boundary on the northern part and around a pond adjacent to Westwood Farm, a grade II listed farmhouse that is part of a group of buildings in the central southern section of the site.
- 3.294 The site lies to the west of a long line of mainly detached dwellings on the western side of Cromwell Lane. These include Cromwell Cottage, a restored grade II listed building, on the northern edge of the line adjacent to a former disabled sports centre, now demolished in connection with an outstanding planning permission for redevelopment to provide over 100 new housing units.
- 3.295 Both the above scheme and the development of land south of Duggins Lane, which I endorse in part, would add additional vehicle movements to both Station Avenue and Cromwell Lane. Nevertheless, I share the Council's general view that the local road network, within a 30 mph speed limit, should have sufficient spare capacity to cope with the further traffic generated by around 400 more dwellings on this site.
- 3.296 This takes into account the proximity of Tile Hill Station, the availability of local bus services and the reasonable walking distance to the local shops and services in Tile Hill village as alternatives to private car use. There are also two available locations through which a new main vehicular access to the site could be satisfactorily provided without requiring the demolition of existing dwellings.
- 3.297 Like the Council, I am also satisfied that a full range of size and type of new housing could be readily provided on this large site and

that the close proximity to the railway station, to Cannon Park MDC only about 3km away and to local schools, are such that it represents a reasonably sustainable location for new housing development, in principle. Whilst actively farmed use at present, including use for beekeeping, and of grade 3 agricultural land value overall, it seems to me that these considerations do not amount to a justification for precluding development in circumstances where new greenfield sites have to be identified in and around the city to meet longer term needs, including in the presently defined GB.

- 3.298 In the absence of any formal designations, there is no firm evidence of any significant archaeological or ecological interest in the site that would be sufficient to preclude new development. There are, however, some specific features, such as hedgerows and individual mature trees, that would justify retention and/or prior investigation, such as remnants of ridge and furrow in the north western area, in any overall scheme, despite the modern farming practices that appear to have operated over the majority of the site in recent years. Also, there is nothing to suggest that all necessary services, including foul water drainage, could not be provided for new housing at reasonable cost.
- 3.299 Local residents raise concerns over surface water drainage in the vicinity, particularly in the light of significant flooding in December 2008. They also draw attention to the presence of an important aquifer from the (permo triassic) sandstone said to be only a couple of feet or so below the land's surface at times, which historically provided water for the many local wells hereabouts. However, it seems to me that the most important consideration is the role that this land plays as part of the present GB on the western edge of the city within the Meriden Gap and where only about 1.5 miles separates it from the settlement of Balsall Common.
- 3.300 "Given the clear views that extend across this area from all directions", I have no doubt that the CGBR (Dec 2007) (CS/S7.8) was accurate when it concluded that "development of this land would clearly amount to urban sprawl, encroachment of (built development into – my addition) the open countryside and the reduction of the Meriden Gap". I am equally sure that, as emphasised by its largely open aspect to the west and south west, with landscaped views representative of those described as typically "Ancient Arden", this land properly fulfils the purposes of GB designation. Moreover, this will not be materially altered by the completion of development at the former disabled sports centre site, in my judgement.
- 3.301 Consequently, new housing development here would represent an incongruous extension of built development into the open countryside around the city and an unnecessary intrusion into the important Meriden Gap in a particularly sensitive location. These conclusions are intensified by the absence of any firm features on the ground along which to establish a clear new boundary for the

GB, beyond the artificial administrative division between Coventry and Solihull. Accordingly, there is a real risk that some form of precedent might be set for development to extend westwards at some time in the future, thereby exacerbating the harm to the Meriden Gap in particular and GB objectives as a whole.

- 3.302 In my opinion, it is important that a firm and long term defensible new boundary is established on this western edge of the city, in accordance with guidance in PPG 2. I consider that this should be logically defined by the rear of the line of domestic properties along the western side of Cromwell Lane, rather than excluding any undeveloped frontage sites. Importantly, this would also achieve consistency with that to be established to the north of the railway line, once land south of Duggins Lane in the CS is developed.
- 3.303 Moreover, it would also retain a swathe of GB land within the city boundary on the western side of the built up area to help maintain the Meriden Gap at one of its narrowest and most sensitive points. Accordingly, I conclude that the release of this site from the GB is not justified by the available evidence and that it is not suitable or appropriate for identification as a reserved new housing site.
- 3.304 In the light of all of the above, I recommend that the land at Cromwell Lane should not be identified for new housing but retained within the GB for the plan period, with the number of new houses proposed partly replaced by alternative sites that are clearly within the north/south corridor, unlike this site. I further recommend that a new GB boundary instead be drawn consistently along the line of the rear of the housing plots on the western side of Cromwell Lane.

Land at Lentons Lane

- 3.305 The submitted CS includes an allocation of greenfield land in the GB, south of Lentons Lane and north of the M6, for 160 units of new housing. However, it has now become clear to the Council that the extent of previous shallow mining works on the site is such that the necessary remediation works would render new housing development economically unviable for the foreseeable future. Accordingly, the deletion of the proposed allocation is put forward in the Council's FPCs (CS0.2C). In the absence of any evidence or representations to the contrary, I see no reason to disagree. I therefore endorse the removal of this site from Table 3.

Land at Hawkesbury/Sutton Stop

- 3.306 To the east of Grange Road/Black Horse Road, south east of Sutton Stop and the Coventry-Oxford canal, and north east of the M6, this area of gently sloping, open, roughly grassed, farmland comprises two triangular fields, bounded by hedges and bisected by a public right of way and high voltage power lines. A substantial spoil mound, created by demolition from the former Coventry Power Station to the east, is also visually prominent from the site.

- 3.307 In terms of suitability for new housing, the site adjoins but is outside the Sutton Stop Conservation Area relating largely to the canal and vehicular access is available onto Grange Road. However, improvements to the existing road junction seem likely to be necessary in the interests of highway safety, due to the proximity of the Coney Lane bridge over the canal to the north, in connection with any new housing development.
- 3.308 The site is assessed as of principally grade 3 (and thus moderate/average) agricultural land quality and contains little of high biodiversity value (other than the hedgerows) according to the CGBER (CS/S7.12). This is despite the fact that the adjoining grassland to the east, on both sides of the canal, is identified on the PM as a provisional Local Wildlife Site for its ecological interest.
- 3.309 Proximity to the former tip suggests that any possible ground contamination would need to be investigated in detail, albeit there is no firm evidence available of any pollution at present, prior to development. Also, mitigation measures for any new housing seem likely to prove essential in terms of noise penetration across the site from an elevated section of the busy M6 to the south west.
- 3.310 However, none of the above, individually or collectively, represents a sufficiently strong constraint to preclude new housing development here, in my opinion. The Council acknowledges that this site is further from the city centre and less well related to other centres than some other potential alternatives. Nevertheless, it is clearly within any logical definition of a north – south corridor across the city and reasonably close to lower level local services and facilities.
- 3.311 It is thus in a reasonably sustainable location, including in respect of public transport links. Subject to good design and layout, as well as retention and enhancement of the peripheral hedges to provide firm boundaries to the GB for the long term, I am therefore satisfied that new housing development here would be suitable and appropriate in principle, in the current Coventry context referred to elsewhere in this report.

Land at Gibbet Hill

- 3.312 An area of presently open rough pasture land in the GB, to the south of Gibbet Hill Road and with vehicular access available off Little Cryfield is reserved for about 55 new houses. Although of grade 2 quality, the site would represent a relatively small loss of agricultural productivity and is already surrounded by housing on 3 sides, with a much larger area of open land in the GB to the west.
- 3.313 I am therefore satisfied that new housing here would be appropriate in principle, as development would help create a clearly consistent and logical western boundary to built development in the locality, to

be reinforced by new planting, that would be readily defensible against further development pressures in the long term. In this respect, I agree with the conclusion of the CGBR (Dec 2007) that, with careful design, new housing on this site need not give the appearance of urban sprawl or encroachment into the open countryside. The site is sustainably located, within a reasonable walking distance of both primary and secondary schools, albeit the nearest MDC at Cannon Park is just over 2km away.

- 3.314 According to the Coventry GBER (CS/S7.12), "the site appears to have only limited wildlife value" and there is no evidence from any other source to indicate otherwise. In the absence of any other recorded physical, environmental or infrastructure constraints to new housing I endorse the removal of this site from the GB and its identification in Table 3, in the light of my conclusions elsewhere regarding the overall needs for new housing land to be identified in and around Coventry for the plan period.

Land at Duggins Lane [see also Section 13C]

- 3.315 An area of essentially flat land west of Station Road and north of the railway adjacent to Tile Hill Station is reserved for about 50 new houses in the CS. Of grade 3 agricultural land quality, it is currently used for rough grazing only. Once the permitted redevelopment of the former disabled sports centre for over 100 new housing units is completed immediately to the south of the railway, I agree with the Council that the site would be largely enclosed by built development on three sides. Thus, its development for new housing also would essentially constitute a consolidation of the built form of the city up to a new, clear and logical, boundary that would be consistent on both sides of the railway and further to the north too, rather than acting as an extension of development into the open countryside.
- 3.316 Although a small part of the land in the north eastern corner falls within Flood Zone 2, according to the EA, this need not be built upon and therefore, subject to a full site specific FRA including in relation to the Canley Brook on the northern boundary and based on specific proposals, I am satisfied that the Council's identification of this site for new housing need not be changed for this reason. The site is also adjacent to Tile Hill Station, with bus routes nearby and within a reasonable walking distance of the, albeit quite limited, facilities in Tile Hill village, as well as only about 2km from Cannon Park MDC. It is therefore in a sustainable location.
- 3.317 It is capable of delivering both affordable and executive housing with the layout, design and landscaping/boundary treatment addressing the matter of potential noise intrusion across the site from the railway and station. Accordingly, in the absence of any other identified material constraints and in the knowledge that a suitable vehicular access is achievable from Station Avenue, I am

satisfied that it is suitable, in principle, for new housing and that no change to the CS is required in respect of this site.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs)

Delete Site 32 - Cromwell Lane – Greenfield – 390 from Table 3.

Amend GB boundary to run along rear of house plots on western side of Cromwell Lane.

Matter 9 – Transport [Policy AC1]

Issue 61 – Is the overall transport strategy consistent with PPG 13, the relevant regional policies and the Local Transport Plan [LTP] and, if not, what needs to be changed and why ?

Issue 62 – Is policy AC1 suitable and appropriate to deliver the necessary improvements, including in terms of rail and bus services, park and ride and cycling/walking and, if not, what else needs to be done and why ?

Issue 63 – Is there a robust and credible evidence base to demonstrate that the proposals can be delivered over the plan period ?

3.318 In common with the HA and WCC, I too am satisfied that the overall transport strategy in the CS in general and policy AC1 in particular, are consistent with national guidance in PPG 13 and the RSS, notably policies T1 and T2 thereof, as well as the LTP (CS/S8.2). Moreover, the implementation of the policy is closely connected to the funding of the LTP's new schemes. This includes the new rail station at the Ricoh Arena/Arena Park MDC, as part of a co-ordinated sub-regional rail improvement scheme between Coventry and Nuneaton (NUCKLE 1) and Coventry and Leamington Spa (NUCKLE 2).

3.319 The additions to paras 8.6, 8.8, 8.9 and 8.16 now proposed by the Council, including those agreed with the HA, clarify the likely road improvements necessary at both Junction 3 of the M6 to the north of the City (A444) and to the south in the vicinity of Stoneleigh Road (A46), as well as at the Tollbar End (A45/A46) junction.

3.320 The CS also promotes significant bus service enhancements over the plan period, improved Park and Ride facilities and a continuing emphasis on improvements to the transport network in the important north-south corridor, in line with the sub-regional strategy endorsed in the RSS. Efforts are also to be made to increase walking and cycling as alternatives to the private car, together with traffic management measures to make the best use of the existing road network.

3.321 In the light of the Examination debate, I am aware that most of the funding for the NUCKLE 1 scheme, let alone NUCKLE 2, has not yet been formally committed. Nevertheless, I endorse the view of the Council and its neighbouring authorities that it is vitally important to the successful implementation of the sub-regional strategy, not just for the city but for the wider north-south corridor, as endorsed in the RSS. It has already been accorded a high priority by the WMRA and AWM for regional infrastructure investment.

3.322 Accordingly, I consider that there is a reasonable prospect at least of its being approved for implementation in the near future, despite

likely public spending cuts in the short term at least. Thus, I conclude on transport that both the overall strategy of the CS in this respect and policy AC1 do not require any further changes to be sound.

Issue 64 – Can the access problems at the Willenhall Triangle employment site be overcome during the plan period ?

3.323 This issue is dealt with towards the end of the Employment Section.

Matter 10 – Environment [Policies EQ1 – EQ5]

Issue 65 – Policy EQ1 – Design - Is the policy consistent with national guidance [e.g. PPS 1] and regional policies and will it achieve its objectives as worded ?

- 3.324 Subject to the minor changes set out later in this report that are essential for clarity and consistency, this policy provides a full list of key principles that must be satisfactorily addressed in all new developments in order to achieve high quality design. By virtue of its breadth of coverage there is an inevitable degree of overlap with national guidance, such as in PPS 1, albeit there is no inconsistency.
- 3.325 Given the necessity of the CS containing an overall “high level” policy seeking high quality design across the city, I see clear advantages if that policy is comprehensive and acts, as far as possible, as a single point of reference for new schemes. Moreover, the important references to the views of the 3 spires and the particular character/setting of the road, rail and canal corridors indicate that the policy is more than just a rehash of national or regional ones but is locally distinctive, to some extent at least.
- 3.326 In such circumstances, I am satisfied that, as reworded, the policy should help ensure that all new developments make a positive contribution to the character and appearance of the city over the plan period and thereby achieve its objectives. It does not require any further change for it to be sound. However, the first two sentences of para 7.7 are unnecessary in a CS and should be deleted for brevity.

Issue 66 - Policy EQ2 – Green Belt - Is the policy consistent with PPG 2, including in respect of the proposed realignments and additions to the GB and the designation of narrow corridors/wedges ?

- 3.327 The designated GB in and around Coventry is unusual in that it comprises two different types. The first are areas of presently largely open countryside surrounding the existing built up area of the city, which might be termed “typical” GB as found elsewhere in the country. The second are “green wedges” (GW), often comprising long, narrow, corridors alongside watercourses, that penetrate the city providing areas of linear open space separating built development.
- 3.328 The latter are nationally uncommon but a long established and distinctive feature of the city that have been endorsed in policy terms in previous strategic guidance (para 15, PPG 10 – Strategic Guidance for the West Midlands - Sep 1988) and in the CDP Inspector's Report (2000) as making a specific and very important contribution to the character and appearance of the city. Most are unsuitable for development for practical reasons including flood risk, access, etc. in any event.

- 3.329 Nevertheless, and notwithstanding my doubts about their strict compliance with national guidance in PPG 2 if their designation as GB land were being sought for the first time now, I endorse the judgement of the Council that none of the present GWs should be entirely removed from the GB as part of the present review of boundaries. Most are not realistically capable of providing suitable land for new housing (or employment) development and, in most instances, their loss would significantly detract from the limited extent of green space available within built up areas of the city.
- 3.330 However, where the Council has identified an overriding need for new development in the CS, such as at the EfW plant on London Road, in the NDC areas and at the various school sites set out in policy EQ2, I entirely agree that it is appropriate to alter boundaries and remove land from GWs to facilitate schemes that are in the best interests of the wider community and, as such, provide exceptional circumstances to justify the changes.
- 3.331 In contrast, as they were not designated originally as meeting the purposes of including land within a GB, I cannot support the inclusion of any further areas within a GW as a replacement or "compensation" for land to be removed. With one specific and important exception referred to in more detail below, the same conclusion applies in respect of the three new GW "corridors" that are proposed to now be included in the GB under policy EQ2. As none was deemed worthy of GB designation previously, I am not satisfied that the Council has demonstrated that there was an obvious error relating to their omission or that their inclusion is now essential to achieve the purposes of GB designation.
- 3.332 Consequently, the reference to the Eastern Green, Keresley and Potter's Green Corridors should be deleted from policy EQ2. They would continue to be protected from inappropriate development by policy EQ3 in any event and thus formal GW/GB designation is not necessary. Although the policy wording referring to the GB boundary being realigned does not need to be altered, these recommendations will also need to be reflected on the PM.
- 3.333 The significant exception is the land north of the former Jaguar factory at Browns Lane as this was originally designated as GB and clearly forms part of the Coundon Wedge. It was previously subject to a special policy in the CDP (CS9) reserving it for development in response to site specific and exceptional circumstances surrounding the potential expansion of the adjoining factory.
- 3.334 Now that those exceptional circumstances no longer exist it should revert to GB designation, in accord with national guidance in PPG 2, and I endorse its inclusion in policy EQ2 accordingly. In my view, this provides a good example to demonstrate that the reservation of land in the GB for potential future development, as envisaged in PPG 2, does not automatically mean it will inevitably be developed.

Issue 67 - Policy EQ3 – Green Infrastructure - Is the policy consistent with PPG 17 and are the green space standards supported by robust and credible evidence or too onerous and/or too detailed for a CS ?

3.335 Following the Council's clarification that the heading of the panels in paras 7.44 – 7.48 inclusive should be "Coventry Greenspace Minimum Standards", i.e. those referred to in the first part of this policy, I am content that the policy is suitable and appropriate, in general terms. Also, taking into account the Council's FPCs to add the last sentence of para 7.43 into part 2 of the policy (as a new second sentence) and replace "safeguard" with "protect" and "including" with "incorporating" in part 1, I am satisfied that it is sound, as amended. However, paras 7.34 – 7.36 inclusive, at the start of the supporting text, essentially comprise only background information and do not need to be included in a CS. They should be omitted as not necessary. The table under para 7.44 also requires minor changes to arithmetical errors so that the "combined quantity standard should be 2.45 not 2.44 and the "Principal Open Space" element 0.65 not 0.69.

Issue 68 - Policy EQ4 – Open Spaces - Is the policy consistent with PPG 17 and should it also seek to remedy existing deficiencies in green space in the city ?

3.336 In addition to deleting all the references to localised deficiencies in the different categories of open space across the city, the Council also now proposes to move all of the Greenspace Standards into a new Appendix 3. I endorse this change as the existing deficiencies are not directly related to the standards that the Council now seeks compliance with in relation to new development and could not reasonably be so linked in any event.

3.337 Of course, this does not mean that the Council should not target its own efforts on the areas in greatest need of new open space and/or improving provision at particular levels of the open space hierarchy. This is evidenced by the proposal for a new Area Park at the Sphinx site to serve the south east part of the city referred to in part 1 of the policy.

3.338 However, in the context of a quite densely built up and compact city I accept that the policy aspirations for rectifying existing shortfalls have to be reasonable and realistic in terms of the limited resources and redevelopment opportunities likely to be available over the plan period. Overall, I am satisfied that the extensive evidence base available on this matter, including a recent full city wide and PPG 17 compliant audit of existing provision properly justifies the policy and its contents.

3.339 But, in order to clarify that, in practice, the same area of open space can contribute to more than one category in the standards, I

support the Council's proposal to add new fourth and fifth sentences to that effect in the middle of para 7.43. The last sentence of that para is also to be added into part 2 of policy EQ3 as a new second sentence. With these amendments, I conclude that this policy is sound and should prove to be workable in development management terms.

Issue 69 - Policy EQ5 – Biodiversity - Does the policy seek to suitably implement the guidance in PPS 9 ?

- 3.340 In response to representations relating to the inclusion of "and provisional" Local Wildlife and Geological Sites in the first part of the policy, the Council now accepts that this is not appropriate in accordance with national guidance in PPS 9. I agree that it should be deleted, along with the identification of any such sites on the PM and the second sentence of para 7.63 that refers, to be sound.
- 3.341 The policy does not differentiate between the various types of site designation listed, which is not strictly in accord with national guidance in part 5 (i) of PPS 9. However, I note that there are no International or European designated sites (SPA, SAC, Ramsar, etc.) in the city and that, even if one were to be designated, part 6 of PPS 9 confirms that they enjoy statutory protection in any event and that there is no need to include specific policies to that effect in development plans.
- 3.342 The policy essentially reflects and carries forward the equivalent adopted one in the CDP (CS9) that has been in operation for a number of years with no evidence of any material difficulty arising. These local circumstances are persuasive and I do not consider it essential for the policy to be completely re-written to be sound. However, in order for it to comply with national guidance in parts 8 & 9 of PPS 9, the reference in the second sentence of the policy to "other sites," should be replaced with "sites" and the comma after "value" in the next line also removed.
- 3.343 I also endorse the Council's proposal to add to the final part of the policy so that it is clearer about what is covered. Nevertheless, the suggested wording is not entirely effective in achieving that aim. Accordingly, the final part of the policy should be changed by, firstly, replacing "Historic Environment Assets" with "ancient woodlands, historic environmental assets, trees protected by preservation orders," and, secondly, by adding ", in the case of archaeological remains," before "all practical measures"; the latter as in the Council's FPCs.
- 3.344 Whilst the supporting text to the policy is informative, it seems to me that the first two sentences of para 7.7, paras 7.34 to 7.36 inclusive and para 7.52 are just general background information, given what is also said in para 7.53, and should be deleted. Instead, a much briefer description of "Biodiversity" should be

added into the Glossary in Appendix 2. Map 7 should also be deleted as unnecessary.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs) –

Policy EQ2 - delete Eastern Green, Keresley and Potter's Green Corridors.

Policy EQ5 – replace "other sites," with "sites" and delete comma after "values" in second sentence.

Para 7.7 – delete first two sentences

Paras 7.34 to 7.36 inclusive - delete.

Para 7.44 - table below – replace "2.44" with "2.45" in the "combined quantity standard" and "0.69" with "0.65" in the "Principal Open Space" element.

Para 7.52 - delete.

Map 7 - delete.

Glossary - add "Biodiversity".

Matter 11 – Energy, Flooding, Water [Policy SG2]

Issue 70 – Are the targets set out in policy SG2 consistent with national guidance and regional policies ?

Issue 71 – Are they supported by a robust and credible evidence base ?

Issue 72 – Are they reasonable and realistic in terms of delivery, bearing in mind the associated costs imposed and/or should they be more flexible and, if so, how ?

3.345 In addressing climate change, the Council already has an approved Strategy (CS5) and an adopted SPD. In addition, the CS also follows the leads given by the PPS1 Supplement, notably paras 18 - 20, and PPS 22 in encouraging the use of renewable and low carbon energy in all new developments. Moreover, policy SG2 includes a requirement for at least 10% on site generation of energy for all significant developments that accords with the advice in para 8 of PPS 22 and policies SR1, SR2 and SR3 of the RSS.

3.346 I agree with the judgement expressed in para 2.35 of the RSS Panel Report (Sep 2009) that such a figure is now generally acknowledged to be realistic and reasonable without excessive expense in most schemes of moderate size across the country (the "Merton Rule"). I am satisfied that a general 10% on site target is appropriate for Coventry at present and does not require any special local justification to confirm that new housing delivery would not be materially affected as a result. This conclusion is supported by the qualifications in the policy that allow the economic viability of individual schemes to also be taken into account.

3.347 Similar conclusions apply in respect of the use of best practice for energy efficiency and conservation in all schemes as this reinforces rather than cuts across the relevant requirements of other related legislation. However, the soundness of some other detailed aspects of the policy is less clear cut, in my view. In relation to CHP systems, the proposed size threshold of 50 units, beyond which all developments should explore their use, seems to me too low in terms of its potential effect on the overall economic viability and practical implementation of such projects and not strictly strategic in scale in accord with parts i) and ii) of para 8 of PPS 22.

3.348 There is no evidence of this part of the policy having been tested for its economic impact on the overall viability of development in the city, either now or for the plan period. For site specific reasons and in areas outside the city centre in particular, it may simply not be practical to utilise CHP, irrespective of scheme size. There need be no requirement for the costs of a detailed examination to be incurred in those situations.

- 3.349 Moreover, in circumstances where the Council is the main local operator and provider of such systems, at least for the time being, I share the concerns of some respondents that effectively requiring adoption of CHP for all schemes of more than 100 units may not be reasonable for a variety of reasons. These include the likely absence of competitive and practical alternatives for prospective developers, as well as the potential implications for the overall economic viability of projects, especially those that are only just above the size threshold. The advice in para 28 of the PPS 1 Supplement is relevant in this respect.
- 3.350 Accordingly, I consider that there is not a robust and credible evidence base available to support these elements of the policy as submitted. Consequently, it would be unreasonable in principle to either require that such systems be adopted or that even examination of the options should apply to schemes of less than 100 units in the absence of up to date local evidence that the policy's application would be economically viable at such a scale.
- 3.351 On the other hand, in my view, it would be reasonable for all local developments of more than 100 units to at least explore the adoption of CHP and to consider if it is practical and viable. I therefore consider that points 3 and 4 of policy SG2 are too restrictive as submitted and not strictly consistent with national guidance for the reasons given above. Point 4 of the policy should be deleted and point 3 amended by replacing "50" with "100" and deleting the words "are expected" in line 2.
- 3.352 As with CHP, the policy requirement that all new development should be carbon neutral appears to be based on a general aspiration, rather than any specific local testing or economic viability analysis beyond that undertaken in Milton Keynes in 2004. In my opinion, this is insufficient to demonstrate consistency with the economic and housing objectives of the CS or that it would not have a harmful effect on the delivery of new development in general and new housing, including affordable housing, in particular.
- 3.353 Consequently, it does not qualify as the necessary local justification for applying such a standard in advance of the national legislation, which introduces a requirement for carbon neutrality by 2016 under the Building Regulations in any event. Accordingly, I am not satisfied that it fully meets the tests laid out in para 26 of the PPS 1 Supplement for inclusion in a CS policy and must be deleted.
- 3.354 For clarity, the first sentence of the policy should also be simplified to read "All development will be expected to use energy, water, materials and other natural resources appropriately and efficiently, as well as taking account of the effects of climate change (both in terms of mitigation and adaptation).". In addition, the reference to "be expected to" in the first bullet point in the policy is then not necessary in the light of the initial qualifications listed, which would

now include “conservation or” (Council’s FPC), as it serves only to confuse the implementation of these policy aspects. I therefore endorse the Council’s FPCs to add “conservation or” after “technical” and to omit “be expected to”.

Issue 73 – Is the CS consistent with national guidance in PPS 25, including with regard to the SFRA, PPS 25 exceptions test and locations proposed for development ?

3.355 The Council’s SFRA 1 (CS/S6.1) was endorsed by the EA in January 2008. It is apparent throughout that the CS has taken the advice therein fully into account by selecting development locations away from flood zones 2 and 3 in accordance with the sequential test in nearly all instances. I am also satisfied that policy SG1 embraces flood risk within the phrase “health, safety and amenity” in its first bullet point.

3.356 Those elements of policy SG2 relating directly to flooding properly require the avoidance of adverse impacts on floodplains, the mitigation of potential risks and the use of sustainable drainage, if at all possible. In relation to developments proposed for the city centre, Keresley and Walsgrave Hill Farm, amongst others, it is acknowledged that more detailed SFRA 2 work will be required to ensure that those particular issues identified in the SFRA 1 are properly addressed and the requirements of national guidance in PPS 25 fully met at the site specific level.

3.357 I endorse the EA’s view that “resources” should replace “efficiency” in line 2 of that part of policy SG2 dealing with Air and Water Quality to emphasise the need for new development to restrain the use of water. I further agree that “wherever practical” should be deleted from that part referring to Flood Risk, as suggested by the EA, to improve clarity and consistency with PPS 25 and because potential flood risk must be effectively mitigated in all cases.

3.358 In addition, I support the view of the EA that the important emphasis of the third part of the policy should be amended so that the onus is on the developer to explain why the use of SUDS is not possible in any particular situation. In my opinion, this can be achieved by replacing “wherever practicable” with “unless impractical”. Subject to these relatively small changes, I am satisfied that both policy SG2 in particular and the CS in general are consistent with PPS 25 and related national guidance, as well as regional policies QE9 and QE10 in the RSS.

Issue 74 – Are there any significant water supply constraints affecting the CS development proposals ?

3.359 The 2008 Jacobs study (CS/S6.2), on behalf of Severn Trent Water (STW), looked specifically at development of up to 21,000 new dwellings by 2016 in Coventry, as part of the Council’s application for New Growth Point (NGP) status. It confirmed that the resultant

3.5% increase on current demand for water, including from a new eco suburb at Keresley, could be met from existing sources, notably the River Severn aqueduct and the Meriden service reservoirs. This is subject only to the removal of a pressure reduction valve in the south of the city at a relatively limited cost and without any major works or new supply schemes being required.

- 3.360 STW have subsequently advised that the higher number of new homes envisaged under the CS to 2026 does not significantly alter the outcome of this analysis in relation to water supply for the city. Consequently, even before the completion of the Warwickshire Water Cycle Study (WWCS), currently in preparation in accordance with the EA best practice guidance (January 2009), it is possible to conclude that there are no significant constraints affecting the development proposals in the CS in respect of water supply.
- 3.361 However, questions have lately been raised in relation to sewage treatment from the Finham works that serves the city. This is in the light of revelations made by the EA at the examination regarding recent levels of certain pollutants and the potential implications thereof for their water quality licensing regime, in terms of current discharges to the Rivers Sowe and Avon. Whilst this is principally a matter to be addressed between the EA and STW, taking into account their respective statutory duties, it is also necessary to consider possible implications for the delivery of the proposals in the CS, as debated at the examination.
- 3.362 Although the EA criticises the 2008 Jacobs study (CS/S6.2) as relating principally to STW responsibilities and not the wider picture, by excluding flooding and the overall water cycle, the former at least has largely been satisfactorily addressed in the SFRA 1 that the EA has endorsed. Moreover, STW publicly acknowledges that some further upgrading works are or will be required at Finham at some point over the plan period. It also points out that, as a result of previous upgrading works, it should be possible to re-commission older equipment still in place on site to improve water treatment at reasonable cost in the short term, should that be necessary to meet new EA licensing requirements.
- 3.363 At the examination STW also said that that there are reasonable prospects, in the light of projected local growth rates, of additional funding and on site space being available to carry out more significant improvements in the medium term at Finham. The AMR should reveal any approaching treatment capacity difficulties over time and the exact nature of any particular upgrades required would be for further detailed consideration when specific development proposals are discussed and submitted.
- 3.364 In the light of all of the above, I am content that neither water supply nor foul water treatment constitutes a major constraint to the delivery of the new development envisaged in the CS. In the absence of such "showstoppers", I am further satisfied that it is not

therefore essential to await the full and final outcome of the WWCS before confirming that the CS is sound in principle regarding these matters.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs) -

Policy SG2 – reword first sentence as follows: “All development will be expected to use energy, water, materials and other natural resources appropriately and efficiently, as well as taking account of the effects of climate change (both in terms of mitigation and adaptation).”.

Policy SG2 – replace “50” with “100” and delete “are expected ” in point 3.

Policy SG2 – delete points 4 and 6.

Policy SG2 – Air and Water Quality – replace “efficiency” with “resources”.

Policy SG2 – Flood Risk – delete “wherever practical” and replace “wherever practicable” with “unless impractical”.

Matter 12 – Minerals and Waste [Policies SG3 – SG5]

Issue 75 – Are the policies consistent with national guidance and regional policies ?

- 3.365 Deriving as they do directly from MPS 1 and PPS 10, policies WD1, WD2 and WD3 of the 2008 RSS set a clear and appropriate regional context for the CS, including in terms of waste management targets, the need for such facilities and criteria for their location. The subsequent Phase II Review adds targets for diversion from landfill and a requirement to provide sites for new and/or enhanced waste management facilities.
- 3.366 All of the above has been properly reflected in the Council's recent Waste Management Strategy (WMS) (February 2009) (CS/S6.4) that preceded the CS. In my judgement, the same conclusion clearly applies in respect of the CS policies themselves, which are also consistent with the SCS (CS/S3.1). Taking into account the Council's FPCs, notably to amend policy SG3 to confirm that it refers to all waste rather than just municipal as implied previously, I conclude that these policies are consistent with the relevant national guidance and regional policies and require no further amendments accordingly.

Issue 76 – Should the CS include issues and/or strategic objectives in relation to waste, including regarding non municipal waste streams with evidence of the amounts involved ?

- 3.367 The Council's WMS (CS/S6.4), which was the subject of public consultation during 2008, already sets out a strategic vision and objectives that accord with the DEFRA Waste Strategy for England (2007) and the regional targets in policies WD1 and WD2 of the RSS. These include appropriate waste hierarchy principles, with landfill as a last resort, and a spatial strategy for waste management that includes greater and more direct engagement with the private sector to improve performance.
- 3.368 In such circumstances, the repetition of the local established vision and objectives in the CS would have little or no practical benefit, albeit that it might be preferable for the sake of completeness. Similarly, given the extensive data publicly available in the supporting evidence, including CSTP0.4, which is not in dispute, I see no real need for the CS itself to include detailed background information on non municipal waste streams.

Issue 77 – Should the policies cover matters such as apportionment of aggregates, prior extraction and mining legacy issues ?

- 3.369 There are no mineral extraction sites operational within the city's boundaries at present, other than for coal at some considerable distance below ground level. Consequently, there is no need for the

CS to address the issues of apportionment or mining legacy. In accordance with the British Geological Society (BGS) advice, Mineral Safeguarding Areas (MSAs) are defined on the PM as the locations of current or future economic importance for minerals. In the light of the above I am satisfied that the Council's strategy on minerals is appropriate to the city's wider context and sufficient to accord with Mineral Policy Statement (MPS) 1 and also policy M1 of the RSS. In my opinion, the matters listed in the issue do not need to be directly addressed in the CS given the "higher level" policies that apply equally to Coventry already provided by the RSS. Consequently, I consider that policy SG5 is sound without the need for any further additions.

Issue 78 – Is there a need for a criteria based policy for the location of waste management facilities in relation to the scale and location of capacity, including landfill ?

- 3.370 The Council's FPC at the start of policy SG3 makes clear that it refers to all waste management facilities and not just those concerning the municipal waste strategy. Accordingly, I am satisfied that point 3 of the policy, particularly when read alongside policy WD3 of the RSS, will provide suitable guidance and appropriate detailed criteria against which proposals for new and/or expanded waste management facilities should be considered.
- 3.371 This conclusion is reinforced by the Council's confidence that the proposed replacement of the Bar Road EfW plant is likely to be the only strategic scale site for waste purposes required in the city over the plan period, so that other such land allocations are not required. Given that many types of waste management operation are nowadays often acceptable in principle on existing industrial sites in environmental terms, I see no reason to doubt the Council's judgement on this matter.
- 3.372 In relation to landfill, I accept that, as there are no current or proposed mineral extraction sites within the city boundary, there is no realistic prospect of such local provision over the plan period that the CS needs to address. Again, my conclusion on this issue is supported by the evidence of an established, long term, sub regional waste management partnership with Solihull and Warwickshire Councils. This involves the exchange of certain types of waste across borders to mutual public benefit, including in terms of regular "fuel" supplies for the EfW plant and the provision of suitable landfill capacity outside the city.
- 3.373 It should also provide, over time, for an increase to a minimum of 50% recycling of waste materials with less than 10% going to landfill in accord with national (DEFRA - Waste Strategy 2007) and regional policies (WD1 and WD2 of the RSS). Therefore, I conclude that, as amended in the FPC, policy SG3 is fit for purpose and sound as submitted. It does not require any further amendments or additions.

Issue 79 – Is the removal of land from the GB for the proposed energy from waste plant justified by robust and credible evidence, including the proportion of the city's waste that it would handle ?

- 3.374 The full strategic case for a replacement Energy from Waste (EfW) plant in Coventry is made out in the WMS (CS/S6.4) and is fully supported by the Council's partners (Solihull and Warwickshire Councils) as an integral element of an overall waste management strategy on a sub regional scale. It is reinforced by the recent agreement to funding via DEFRA and the Treasury on the basis that it forms a vital part of the agreed sub regional strategy and should enable the national target of 50% of all waste to be recycled or composted by 2020 to be exceeded and landfill minimised as a result.
- 3.375 The present plant is, effectively, nearing the end of its useful life and will soon require extensive investment if it is to continue to operate satisfactorily, even at its currently relatively low level of efficiency compared to technologies now available. This fact also underpins the need. I also note that a new EfW plant would provide the opportunity for a pipeline to enable the heat generated to be used elsewhere as a CHP type facility. The Council has already identified the concentration of public buildings in the city centre as a potentially viable core baseload for such a project. Other opportunities, such as at Jaguar/Whitley are also being actively pursued, notwithstanding some difficulties with similar schemes elsewhere in the UK.
- 3.376 I further endorse the view of the Council and its partners that the time has come to make the difficult decision about the future of the existing plant and the role of EfW in the sub regional strategy. Such decisions cannot always be delayed in the often vain hope that "something better" will come along to resolve the issue. Nevertheless, the full details of the plant's operation and the exact technology to be used are not a matter for the CS but for subsequent detailed consideration.
- 3.377 Whilst it may reasonably be assumed that any new plant would operate to higher environmental standards than the existing one, such consideration would include in terms of any possible local air quality impacts nearby that would require examination in a site specific EIA in relation to any particular project. Under these circumstances I am satisfied that a new EfW plant would have a generally positive effect on the treatment of all types of waste, particularly by avoiding landfill, as part of an integrated sub regional treatment strategy that also includes other important policies and proposals.
- 3.378 On the question of supply, it seems to me that despite the various Councils largely successful efforts to improve recycling and composting totals and percentages, the significant growth

envisaged for the city over the plan period must also be taken into account in terms of the extra waste likely to be generated. The fact that other facilities in the wider area may also be able to take some of the waste that would otherwise be used here does not materially detract from the important role that a new and efficient EfW plant located in the city would inevitably play in the overall waste management strategy of the sub region. This judgement is reinforced by the expectation that the new plant would handle around one third of the city's non recyclable waste.

- 3.379 A long construction period (4/5 years) is necessary for such a complex project. Due to the adverse impact on the operation of the waste strategy of having no plant available for such an extended period, I am satisfied by the Council's evidence that neither an overall or phased refurbishment of the existing plant would provide a satisfactory solution. Consequently, I conclude that there is a very strong justification, supported by robust and credible evidence, for a new EfW plant in the city.
- 3.380 As to location I accept that the Council properly commissioned an exhaustive site search in and around the city and a suitably thorough analysis of all those sites that passed through the first sieve process. Whilst arguable that the solution now proposed was fairly obvious, I fully endorse the necessity of undertaking the full process so that there can be little, if any, remaining doubt that preferable sites either do not exist or are not available for a new EfW plant within the search area.
- 3.381 The selected site adjoining the existing plant is partly in use for allotments and in a GW part of the Coventry GB. This location within the existing built up area of the city not only facilitates the retention of complementary operations alongside but also the possibility of a rail link into the site at some point in the future. Any landscape or visual impact of the new building(s) on the locality would be balanced by the removal, albeit slightly later, of the existing one and, no doubt, also further ameliorated by extensive landscaping and planting over time.
- 3.382 Overall, I therefore consider that there is an overriding need for a new EfW plant to serve the sub region in the city that is the main focus of growth and development over the plan period. I further consider that the selected site has been demonstrated by robust and credible evidence to be the most suitable and that no reasonable or preferable alternatives are available. Accordingly, taking into account all of the above, I conclude that, in accord with guidance in PPG 2, the proposal represents very special circumstances that justify the removal of the site from the GW part of the GB and its allocation for a new EfW plant in the CS.
- 3.383 I am therefore satisfied that policy SG4 is essentially sound, save in respect of the addition of the land presently occupied by the existing plant into the GB. This does not meet the tests applicable

to the addition of land to a previously defined GB that derive from PPG 2 as it was not obviously or erroneously omitted at that time. Moreover, it is unnecessary to identify the land as GB in order to protect it as future open space. This can be achieved equally well by its formal allocation for that use in the CS (and on the PM) and the operation of policy EQ3. The policy should therefore be reworded to ensure that the site of the existing plant is brought into use as public open space as soon as reasonably practical, recognising that a major demolition project is involved, after the first commercial, as distinct from pre-authorised testing, operation of the new plant.

Issue 80 – Are the monitoring indicators and targets for minerals and waste satisfactory and sufficiently rigorous ?

3.384 The Council's FPCs would add an indicator relating to non municipal waste streams under policy SG3 and make the targets themselves directly consistent with those in the RSS for policies SG3 and SG4. As amended it would clearly relate to all waste, not just municipal. This should ensure that the monitoring undertaken is sufficiently rigorous and comprehensive, as well as co-ordinating with that done concerning the RSS in the interests of efficiency and effectiveness. I am therefore satisfied that no further changes are required.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs) -

Policy SG4 – Instead of the Council's FPC, reword the policy as follows: "To meet the city's long term requirements for waste management a site is removed from the Green Belt and allocated for a new energy from waste plant at Bar Road. Within two years of the first commercial operation of any part of the new plant the whole of the adjoining site of the existing plant shall be brought into use as public open space and retained thereafter."

Matter 13A – New Sites

Issues 81 – For each site, is it suitable and appropriate for the proposed use and, if not, why not – for example, are there any significant physical, environmental and/or infrastructure constraints ?

Issue 82 – Is removal from the GB, where relevant, justified by robust and credible evidence ?

Issue 83 – Can the proposal deliver the appropriate size and type of housing, including affordable housing and to what timescale as well as providing the necessary services and facilities to accompany new development ?

Land North of Eastern Green

- 3.385 Despite its name, this proposal relates to a potential major GB land release for new housing on the western edge of the city. It formed part of one of two (with Keresley) main “areas of search” identified as potentially suitable for new housing in the GB around the city in the Coventry Green Belt Review (CGBR) (Dec 2007) (CS/S7.8). However, the subsequent Sub Regional Green Belt Study (Jan 2009) (CS/S7.7) (JGBS) did not support its release and accordingly, it is not reserved for development in the submitted CS. The proposal would involve about 1,500 new houses on land to the north of the ribbon of housing along Lower Eastern Green Lane, east of Pickford Green Lane and west of the Allesley Green estate.
- 3.386 Although none of the area proposed for new built development lies within Flood Zones 2 or 3, according to the EA, drainage concerns remain regarding potential effects on the floodplain of the Pickford Brook in the north east corner of the site, as well as over the size of the culvert under the A45 to the east. However, any proposals would have to be subject to a site specific FRA that would include modelling of all the watercourses on the site, as well as assessing the capacity of the A45 culvert and the suitability of new crossings of the streams by the proposed access road to take storm water flows.
- 3.387 Based on preliminary work done to date and taking into account the underlying sandstone bedrock, it appears that the provision of open space along the Slipperside Valley that runs east – west across the site could incorporate a sustainable drainage system to serve new development satisfactorily and ensure that there are no adverse drainage effects downstream. Accordingly, I am satisfied that flood risk does not represent a primary constraint to development here.
- 3.388 Workable coal reserves exist below the site that UK Coal suggests could be extracted by deep mining from their Daw Mill facility over a period of about 3 years. As things stand, work would not be expected to start for 8/9 years from now. Clearly, in accord with guidance in MPS 1 and MPS 3, it would not be in the national

interest for such reserves to be sterilised. Nevertheless, the present mining leases cover only the land to the north of the Slipperside Valley, which the proposals show as largely public open space and retained agricultural land and not for new built development. Consequently, I am content that, in the event of this area coming forward for new housing development, it should be possible to ensure through phasing that any viable coal reserves could be first extracted from deep beneath the site before new built development takes place, in accord with policy SC5 of the CS.

- 3.389 For the scale of development put forward in the latest scheme, it is clear that water supply would not be a constraint. Similarly, I am satisfied, based on initial estimates that appropriate improvements to the city's existing network and treatment capacity would be achievable at a direct cost of about £1k per dwelling, that the sewerage improvements required would be feasible and viable.
- 3.390 Whilst there are some potential areas of interest that would need to be examined on site prior to any development taking place, including a possible moated area north of Pond Farm on the site's southern edge, there are no known archaeological remains with statutory (or non statutory) designations within the proposed development area. The retention, as far as possible, of the hedges defining the largely intact field pattern shown on the 1841 map, for historical and ecological reasons, should be achievable in any masterplan layout. The overall historic interest of this site is not sufficient to preclude development in principle.
- 3.391 Although initial studies have shown a network of intact hedgerows and ponds, as well as some individual trees, that ought to be retained, the site principally comprises open agricultural land that is actively farmed at present. Therefore, the diversity of habitats is limited with a relatively low nature conservation value. Effectively, only common and widespread species are present in the area proposed for new built development.
- 3.392 Nevertheless, the retention of existing features would provide opportunities for ecological improvements as part of any comprehensive scheme, including land to the north of the valley to be used as public open space. On this basis, I am satisfied that there is no objection in principle to development on this site for ecological reasons, including in respect of the relationship with the Pickford Brook Meadows SINC to the east that links to Allesley Park further east.
- 3.393 In terms of delivery, as I understand it, the land is in one ownership and of more than sufficient scale to provide the range of size and type of new housing expected under policy SG10 of the CS and also policy SG12 regarding density. The site is well placed to contribute at least the necessary minimum of executive housing, as well as affordable housing. Subject to the co-ordinated provision of the required infrastructure, including importantly road access from

the A45 to the north, and associated services and facilities, I have not been made aware of any significant constraints to the potential early commencement of development on this site, if required.

- 3.394 Moreover, as confirmed in the site specific SA, the scheme should be capable of meeting equivalent environmental standards to those envisaged for the proposed “eco suburb” at Keresley, as an urban extension. This would include in respect of the comprehensive provision of new green infrastructure with new development, including a substantial “community park” area of public open space along the Slipperside Valley and on the west side of the site, east of Pickford Green Lane.
- 3.395 The current proposal acknowledges that the local road network in Eastern Green would be incapable of satisfactorily accommodating the additional vehicular traffic likely to be generated. It therefore proposes a new road link across the Slipperside Valley and Pickford Brook to serve the development principally from the A45 to the north, via a new traffic light controlled junction. Access to the existing adjoining housing areas and Eastern Green generally would be limited to walking, cycling, buses and emergency vehicles only.
- 3.396 A new 500 space Park and Ride (P & R) facility would also be provided south of the A45. Both the P & R site and the new housing would be served by a new, high frequency, bus route to the city centre, together with other measures to discourage use of the private car by new residents, in accord with part A of policy AC1 of the CS. The Council accepts that, taken together, such measures would be suitable and appropriate for the development.
- 3.397 Local residents express concerns that the extra traffic generated would funnel onto just two, already busy, main roads towards the city centre and also create other problems on the adjoining local road network, including on Juniper Drive and Parkhill Drive to the east. However, in common with the Council, I am satisfied that the measures outlined for public transport provision would be sufficient to help discourage private car use, as part of an overall Travel Plan.
- 3.398 This would be so providing that satisfactory arrangements could be made for the necessary walking, cycling, bus and emergency only vehicle links to Eastern Green. The new A45 link road should also ensure that there would be no material harm to the existing community from increased traffic along the local road network.
- 3.399 Accordingly, I am content that this is a generally sustainable location for significant new housing in terms of reasonably good access to local services and facilities, including schools and shops, on foot and by cycle. This would be improved by associated on-site provision in a development of the scale envisaged, as recognised in the site specific SA. Notwithstanding, I share the reservations of the Council and local residents over the ability of the new occupiers of any new housing here to integrate well with the existing

community and promote social cohesion, due to the absence of direct vehicular links.

- 3.400 The potential development of this site for new housing, including in comparison to Keresley, was debated at the 2009 EIP into the RSS Phase II Review. Subsequently, the RSS Panel Report recorded that “it would be contrary to the long established strategy of maintaining the separation of Birmingham/Solihull and Coventry to contemplate the release of development land that is clearly within the Meriden Gap”. The Meriden Gap has no formal definition on a plan or indeed any physical identity as such.
- 3.401 Nevertheless, due to its relative narrowness hereabouts (less than 10km from the edge of Coventry to the NEC roundabout and less than 3.5km to Meriden), it seems to me that it is particularly sensitive to significant harm from losses of open, undeveloped, land at its peripheries, especially at that narrowest point. Consequently, I consider that any land lying directly between Coventry and Solihull and/or Coventry and Meriden itself, must be taken to lie within the Meriden Gap, in contrast to Keresley to the north west.
- 3.402 Given that it would not extend built development any further west than that which already exists west of Hockley Lane to the south west, the JGBS (Jan 2009) acknowledges that this area of land does not, of itself, prevent Coventry and Meriden from merging. Whilst development here would not therefore reduce the specific width of the remaining open land between settlements, new building on this scale must, by definition, significantly reduce its physical extent.
- 3.403 Moreover, the actual detrimental effect on the gap would be firmly reinforced by the clear public perception of a significant reduction in spacing between built up areas, particularly that arising from the visual intrusion of the new road splitting the otherwise undeveloped land south of the A45 and north of the Slipperside Valley. Therefore, I agree with the Council that it would be seen as, effectively, forming a new “urban edge” to the city. This would be strongly reinforced by the P & R site, including notably when lit at night, in comparison to the retained agricultural land to the west, which would be particularly prominent from important public viewpoints, and especially along the A45.
- 3.404 I also share the concerns that, unlike on other GB sites around the city, this proposal would not provide a new logical, firm and defensible, boundary to the GB, based on clear physical features once completed. Indeed, I consider it more likely that the presence of the new road would, almost inevitably, lead to further pressure for more land south of the A45 to be released for development in the future, in conflict with guidance in PPG 2 and the CS objectives.
- 3.405 The JGBS, in terms of the comparison of GB sites potentially suitable for new housing, would have taken such considerations into account. I consider this helps to explain why land north of Eastern

Green was excluded at that stage, irrespective of the area identified for public open space provision and the potential for the expansion westwards of the linear park linking eastwards across the A45 to Allesley Park.

- 3.406 I am also satisfied that this land contributes strongly to GB objectives in that it helps to prevent urban sprawl from Coventry, safeguards the countryside from encroachment, helps to preserve the setting and character of the Meriden Gap (if only in terms of its extent) as well as encouraging the recycling of previously developed land. The proposal would therefore conflict with these objectives.
- 3.407 Importantly, and in common with the RSS Panel Report, I too consider that this area on the western edge of the city falls outside any north/south corridor on which major new development should be focussed, in order to fulfil the sub regional strategy. When its location within the strategically important Meriden Gap is also taken into account, it is clear that the judgements made in the JGBS regarding those sites that were “least worst” if new housing land has to be found in the present GB, should be supported in this instance.
- 3.408 Given the availability of clearly preferable sites in and around the city and taking into account the potential harmful effects set out above, I therefore endorse the Council’s judgement that this land should not be reserved for development but retained in the GB during the plan period. Accordingly, I recommend no change to the CS in respect of this site.

Land at Park Hill Lane

- 3.409 This small, sloping, triangular area, currently designated as part of a GW and thus the GB, lies just to the west of the A45 (Dunchurch Highway) and is subject to considerable traffic noise as a result. It is separated from a housing estate to the west and south by Park Hill Lane, narrow and tree-lined, from which vehicular access, albeit somewhat restricted, is safely available. There is a garage to the northwest and a large hotel to the northeast on the other side of the road. Thus, the site seems physically and visually much more a part of the existing built up area than of any open space or undeveloped land adjoining, albeit peripheral vegetation ensures that it is quite well screened other than from the north.
- 3.410 The site has no direct green link with the Pickford Brook Meadows part of the Coundon Wedge that prevents Coventry from merging with Allesley or to any other parts of the open countryside around the city, including Allesley Park. It therefore plays no real role in separating settlements nor does it make any contribution to the functions of GB designation. Although identified in the non statutory 1979 Masterplan to the Park Hill Planning Brief for tree planting, the Council later accepted that it would be sufficient for the new houses adjoining to have rear gardens with trees in this

locality so that there would be no public liability for maintenance. Subsequently, there has been no attempt by the Council to acquire the site for new tree planting or as public open space and it has remained under-used. The Council acknowledges that there are no current plans or funds earmarked to acquire the site either now or in the future.

- 3.411 To my mind the removal of this small site from the GW designation would not affect the purpose or functions of the Pickford Brook GW to the south that links Allesley Park to the GB to the west of the city as there is no real physical or visual connection between them at present. In my judgement, this area does not currently fulfil any of the functions of GB land set out in PPG 2, if it ever did. There is no public access or authorised use and it is effectively surrounded by built development, some of it like the hotel on the other side of the A45, visually prominent.
- 3.412 This urban form is apparent for travellers along the A45 for whom the site effectively provides only a fleeting glimpse of open land, seen against the backdrop of the adjoining housing estate, when going south. If developed, the retention of existing peripheral vegetation, plus new planting, should ensure that any loss of a green aspect for travellers would be minimal and not such as to justify the retention of the site within the GW.
- 3.413 The SA demonstrates satisfactorily that there are no physical, environmental or infrastructure constraints to the development of the site for new housing, providing that the existing ash trees and the peripheral vegetation are retained and enhanced. Similarly, on the main part of the site falling within Noise Exposure Category 'C' in accordance with the guidance in PPS 24, sufficient noise attenuation from the A45 traffic should be achievable by a combination of the location, orientation, design, glazing and ventilation of any new building. I consider that the relevant BS and Council noise standards for residential accommodation, both internally and externally, are achievable on this site, particularly as any houses need be no closer to the main road than others nearby.
- 3.414 Moreover, the location is clearly a sustainable one, being within a reasonable walking distance of a range of local services and facilities. Accordingly, I conclude that this site should be removed from the GW designation and hence the GB, irrespective of any development proposals for a single eco dwelling incorporating special facilities for the disabled and/or the provision of community woodland with public access as part of any detailed scheme. I therefore recommend that this site at Park Hill Lane be deleted from the GW (Coundon Wedge) and the GB on the PM.

Land at Browns Lane

- 3.415 An area of around 3 ha in total is put forward for release from the GB and allocation for new housing to the west of Browns Lane and

south of Hawkes Mill Lane on the western edge of the city. Vehicular access would be taken from an existing fairly narrow drive, leading south eastwards onto Browns Lane. There is reasonable visibility along the road at the junction, that currently serves one of two small commercial plant nurseries on the site.

- 3.416 In addition to a single bungalow near the Browns Lane frontage, there is fairly intensive coverage of large glass houses and associated structures, including some more permanent small buildings. In addition to the existing housing to the north and east, the buildings and structures, partly relating to the established plant sales operations, give the site the appearance of PDL.
- 3.417 This means that it reads visually as, effectively, part of the existing built up area with a quite different character and appearance from the open agricultural fields to the west and south west. Given that it is bounded by a strong hedgeline along its long western boundary, the relative elevation of the site in relation to the gently sloping farmland to the west does not render it particularly prominent or visually intrusive in the local landscape, despite the substantial area of buildings present.
- 3.418 Although within a Groundwater Source Protection Zone, according to the EA, this does not, of itself, preclude re-development of the established nursery uses for new housing. It is common ground that, as confirmed in the site specific SA, this is a reasonably sustainable location with regular bus services nearby and most other facilities within a moderate walking or cycling distance. Whilst still operating, the businesses appear somewhat rundown at present, providing only a handful of jobs and, in my view, requiring major investment soon if they are to continue on a viable basis.
- 3.419 Immediately to the north of the site on the southern side of Hawkes Mill Lane, the development is of single plot depth but to the east Burton Close is a substantial modern cul-de-sac at the rear of the line of houses at the western side of Browns Lane. It seems to me that, with existing residential development on two sides, new housing on this site could readily be designed to complement, rather than conflict with, the existing built form adjacent in terms of scale and layout. Subject to the retention of the existing small pond to the west of Burton Close, the trees around it and elsewhere on the site, I am satisfied that suitably designed new housing could be built on this site without materially harming the character or appearance of the locality.
- 3.420 Clearly, some additional traffic would be generated along Browns Lane and on the local road network, compared to that arising from the existing uses, if the site were redeveloped for housing. However, and notwithstanding the new dwellings recently permitted on the Jaguar site east of Browns Lane, I consider that the movements arising from around 65 more houses would not be such as to materially affect highway safety or the free flow of traffic.

Similarly, any additional pressures on local schools would be limited and capable of being absorbed over time.

- 3.421 As a relatively small site, that appears to be in only two land ownerships, it should be capable of being brought forward relatively quickly to deliver new housing as and when required. To that extent it would help provide a variety of size and type of new housing sites, without the long lead in times often associated with very large schemes, as well as being able to deliver the required elements of executive and affordable housing.
- 3.422 In terms of the purposes of the GB set out in PPG 2, the Council accepts that the site does not prevent neighbouring towns from merging or contribute to the setting or character of the city as a whole. The existing GB boundary runs logically along the ends of the house plots along both roads. However, in circumstances where land in the GB has to be identified for new housing within the plan period, it seems to me that an equally clearly defined and logical boundary could be created following development on this site through the retention of the strong western hedgerow dividing it from the open fields further west. The same would apply in respect of the extended garden plots and small fields to the south.
- 3.423 Consequently, unlike the Council, I do not conclude that the development of this site need set any form of precedent for the further expansion of built development onto open greenfield land in the GB to the west and south. Rather, I consider that it would appear as a consolidation of the existing built form between the two Lanes as already strongly influenced by the form and layout of Burton Close adjacent.
- 3.424 Nor, for the reasons set out above and taking into account the well screened position from both roads, visible only through small gaps, do I consider that the proposal would constitute “urban sprawl”, the “extension of ribbon development” or the “encroachment of development into the open countryside”. Bearing in mind the existing uses and buildings on the site, the adjoining development to the north and east, which in the case of that to the south of Hawkes Mill Lane extends much further west, and the potential to create a long term defensible new GB boundary by reinforcing existing strong boundaries, I am satisfied that the scheme would not appear as a physical or visual intrusion into the GB on the west side of the city from public viewpoints.
- 3.425 Consequently, I conclude that any harm to the important Meriden Gap arising from the loss of 3 ha of GB, albeit in this sensitive location on the western edge of the built up area, would be limited and acceptable in all the relevant circumstances, especially in comparison to other potential alternatives on this side of the city.
- 3.426 Accordingly, I recommend that this site be identified as one “reserved” for new housing as and when required, in the CS and

consequently added to Table 3 as replacement site 32 – “Land at Browns Lane (65)”.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council’s FPCs) -

Table 3 - add a new reserved site - Land at Browns Lane – Greenfield – 65.

Amend GB boundary in accord with above.

Amend GB boundary at Park Hill Lane to exclude representation site from the GW.

Matter 13B – New Sites

Issues 81 – For each site, is it suitable and appropriate for the proposed use and, if not, why not – for example, are there any significant physical, environmental and/or infrastructure constraints ?

Issue 82 – Is removal from the GB, where relevant, justified by robust and credible evidence ?

Issue 83 – Can the proposal deliver the appropriate size and type of housing, including affordable housing and to what timescale as well as providing the necessary services and facilities to accompany new development ?

Land East of Orchard Retail Park [see Employment Section]

Land at [Rear of the Boat Inn,] Shilton Lane

- 3.427 This site of 5.5 ha in total essentially comprises a roughly triangular, flat and fairly featureless, field east of the Barlow Lane Industrial Estate, north west of Shilton Lane and south west of the M6 motorway. It lies on the north eastern edge of the city but is not within the GB, unlike Sowe Common, a fairly large public open space on the opposite side of Shilton Lane.
- 3.428 A former private sports ground, with small changing rooms, the land is quite well screened from the industrial estate to the west and the houses on Shilton Lane close to its south west corner by established vegetation. A similar, albeit narrower, strip also separates the site from the motorway, which is at a slightly lower (about 1-2m) level at this point and presently unlit at night.
- 3.429 According to the EA, the land lies in Flood Zone 1 and, therefore, whilst a site specific FRA would be required prior to any development, there is nothing to indicate that surface water drainage, in common with water supply and sewerage, could not be adequately addressed on site. The available evidence, including the SA, also confirms that all other main services could be readily made available for development on this site. It is in a generally sustainable location, with 3 primary schools within 1km, a District Centre within 2km, and regular bus services along Shilton Lane, thus encouraging walking/cycling and public transport use, rather than private car mileage.
- 3.430 The Council has acknowledged that an access to serve residential development on the majority of the site onto Shilton Lane, just north of the Boat Inn, would be safe and satisfactory in principle. Local residents raise concerns about the likely level of traffic to be generated, but it seems to me that, subject to junction design, Shilton Lane should be capable of taking the relatively limited increase arising from around 100 dwellings in relation to existing

flows without material harm to highway safety in the locality, bearing in mind the 30 mph speed limit.

- 3.431 Whilst deer have been spotted at times, for example, there is no evidence of any nature conservation or ecological interest on the site that would be such as to preclude development and the same may be said in relation to historical or archaeological records. It is also common ground that, particularly as it is not in the GB and under one ownership, the site could be made available quickly for new housing if so allocated and is capable of delivering elements of both executive and affordable housing, in accord with policy SG10 of the CS, due to its size and location.
- 3.432 In fact, the Council accepts that the site is capable in principle of being developed for new housing, albeit the southern part only, as recognised in the SHLAA, where it is listed as "1.4 ha (42 dwellings)". One concern regarding the remaining, northern, part of the site is the presence of a high pressure gas main parallel to the motorway. However, up-to-date information from the pipeline owners/operators confirms that its presence does not preclude development on the majority of the site. It could be retained, and with a lesser 7m wide "protection zone" if capped, within a landscaped linear open space, alongside the motorway, with formal public access where none exists at present. Consequently, it does not present an overriding constraint to new development.
- 3.433 Another is the loss of games pitches, albeit there is no sports use at present and it ceased some years ago now, with no evidence to suggest that it is likely to resume. Nor is the land programmed to be acquired by the Council or other public body at any time in the near future. Whether or not there is an overall shortfall of public open space and/or sports pitches in this part of the city (and this remains to be clarified by the Council), the expanse of Sowe Common lies opposite and just beyond the motorway and thus there is no such deficiency in the vicinity of the site. In such circumstances, notwithstanding the initial views of Sport England, I do not consider that this stands up as an objection in principle to the use of the majority of this site for new housing, particularly when the alternative may well be further land releases in the GB.
- 3.434 The Council's main concern is of traffic noise from the motorway, as a fairly wide strip along the north eastern edge of the site falls at night within NEC "C" under PPG 24, where new housing should not normally be permitted. Surveys have revealed that the site is relatively unaffected by noise from the industrial estate to the west, from which it is separated by a substantial strip of vegetation.
- 3.435 However, recent technical work has also indicated that the erection of a 3m high acoustic noise barrier along the whole of the motorway frontage (and around the north west corner of the site) should be practical and effective, taking advantage of the difference in levels between site and road. It should ensure that most of the

site would then fall within NEC “B”, at night, irrespective of any other mitigation measures. Those other potential actions include the layout, orientation, design, glazing and ventilation of the new housing, particularly those nearest to the M6. When these are also taken into account, I am satisfied that it would be possible to create satisfactory living conditions for new residents in noise environment terms on more than just the 1.4ha on the southern part of the site that the Council currently acknowledges in the SHLAA.

- 3.436 Therefore, subject to the retention and enhancement of the existing peripheral vegetation, the provision of public open space, incorporating new footpaths, on both the western and north eastern boundaries as suggested, I consider this site is realistically and practically capable of delivering around 100 new dwellings (rather than 42) within the next 5 years and should accordingly be listed in Table 3 of the CS as “Land at Shilton Lane – Greenfield – 100” and the PM allocation amended accordingly. The conclusion as to its suitability is supported by the north/south corridor general location.

Land at Grange Farm, Longford

- 3.437 Located south of the Coventry Canal, north east of the elevated M6 motorway and north west of Grange Road on the northern edge of the city, this almost triangular area of land is fairly flat and presently in low key pasture/grazing use. It is divided by hedges into smaller fields, with more extensive vegetation along the canal and motorway boundaries, an electricity pylon in the north eastern corner and a farm house with outbuildings also near the Grange Road frontage. It is proposed that the site should be developed for around 100 dwellings.
- 3.438 Planning permission has recently been granted by the Council (R/2009/0120 – September 2009) for 5 new dwellings around the Grade II listed farmhouse to replace the outbuildings. This indicates that, whilst it is largely greenfield land, in circumstances where the city needs a significant number of new houses over the plan period, there is no objection in principle to residential development on this site as it is not within the GB.
- 3.439 However, the proximity to the busy motorway means that much of the land falls within Noise Exposure Category ‘C’ as defined in PPG 24, where new residential development should not normally be permitted. Consequently, the recent permission is subject to a condition (no. 7), amongst many, that requires the satisfactory completion of a Noise Assessment Report to ensure that all the new dwellings meet the BS 8233 “good” criteria internally, and outdoor amenity areas the 55dB LAeq World Health Organisation (WHO) guideline value, through mitigation measures.
- 3.440 Moreover, planning permission for new housing on the full site was dismissed on appeal in August 2007. This was principally due to the impact of road noise and the failure of the scheme proposed to

provide satisfactory living conditions for future residents in terms of noise penetration, notably externally due to the location of public open space.

- 3.441 It is common ground that there has been some resurfacing of the M6 since that decision, albeit not all carriageways, and that subsequent testing has demonstrated noise levels across the site to have been somewhat reduced accordingly. As yet, the Council still remains to be convinced that a satisfactory living environment could be achieved for new residents on the majority of the site.
- 3.442 On the other hand, based on the detailed noise information now available, it seems to me that there is in fact sufficient evidence to conclude that a scheme could be designed to meet both the BS 8233 "good" criteria for new dwellings internally and the 55dB LAeq WHO guideline value externally so that new housing could be built on much, if not all, of the available site. This might well require design solutions, such as single aspect housing along the M6 frontage and the use of buildings, as well as landscaping, to act as a noise screen for both private and public amenity areas.
- 3.443 Nevertheless, sufficient examples exist elsewhere in the country to confirm the practical possibilities, particularly on a site where there are few other significant constraints that need to strongly influence the layout and built form of new housing development. In such circumstances, I am satisfied that there would be a reasonable and realistic prospect of new housing being delivered on this site within the next 5 years and that appropriate elements of affordable and executive housing would also be deliverable.
- 3.444 The site is not in the GB and is otherwise generally suitable and appropriate for new housing with a ribbon of dwellings along the western side of Grange Road and recent housing on the other side of the canal in Nuneaton and Bedworth. Vehicular access is available off a straight section of Grange Road to the east, albeit with a potential need for road improvements, perhaps in connection with other development at Hawkesbury/Sutton Stop to the east. The land is in Flood Zone 1, according to the EA, and whilst any possible flooding from the canal would need to be assessed as part of a site specific FRA this does not amount to a constraint on development in principle.
- 3.445 Although less well located in terms of walking/cycling to local services and facilities than some other sites in and around the city, partly due the constraints of the motorway and the canal, the site is within 1km of a primary school, 2km of a MDC and there are bus services along Grange Road, that could be improved as part of a Travel Plan.
- 3.446 Accordingly, and in the absence of any evidence of significant historic/archaeological and/or wildlife/ecological interest on the site, I am satisfied that it is suitable in principle for new housing. This

judgement is reinforced by its position on the northern edge of the city adjoining the boundary with Nuneaton/Bedworth district. It should therefore be listed in Table 3 of the CS for about 100 new dwellings, as well as allocated for housing on the PM.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs) -

Add Land at [Rear of Boat Inn,] Shilton Lane to Table 3 as new allocated site – Greenfield – 100.

Add Land at Grange Farm, Longford to Table 3 as new allocated site – Greenfield – 100.

Matter 13C - New Sites

Issues 81 – For each site, is it suitable and appropriate for the proposed use and, if not, why not – for example, are there any significant physical, environmental and/or infrastructure constraints ?

Issue 82 – Is removal from the GB, where relevant, justified by robust and credible evidence ?

Issue 83 – Can the proposal deliver the appropriate size and type of housing, including affordable housing and to what timescale as well as providing the necessary services and facilities to accompany new development ?

Land at Plots 10, 11, 12 Banner Park

3.447 Following the submission of a satisfactory SA, the Council now accepts that all three of these relatively small plots of previously developed land west of Banner Lane are suitable in principle for new residential development, as well as the employment uses for which planning permission has already been granted. Together, and at a density reflective of the outline permission for 41 units on plot 11 granted on appeal in August 2007, they would be capable of delivering about 100 new units, including affordable housing.

3.448 I agree with the Council that such new housing would be appropriate in principle on these sites and in this particular location, despite being adjacent to employment uses. In relation to plot 11, the westernmost part of the site is within the GB and there is no suggestion or justification for the removal of this designation. Accordingly, the western boundary of any new built development on this area should be on a consistent alignment with the current demarcation between new housing and open space in the GB immediately to the north, rather than that to the south. In the light of the above I recommend that Banner Park be added to the list in Table 3 of the CS, as a mixed use site, capable of providing up to about 100 new units of housing within the next 5 years.

Land South of Duggins Lane [K P Benfield site – Rep. no. 1114]

3.449 To the north of the site reserved for housing in the submitted CS (site 36), and separated from it by the Canley Brook, is a fairly flat rectangular area of mainly overgrown scrub and trees, also to the west of Station Avenue. Too small to be used for productive agriculture, it would be effectively surrounded by development if new housing is built on the allocated site to the south. As a result, it seems to me that this site would clearly fall within the new, clear and defensible, built up area and GB boundary that would be formed in this part of the city either side of the railway. The Council accepts that, due to its location, development here would not constitute an expansion of the existing urban area of the city.

Consequently, its development, alongside the land to the south, would be acceptable in principle.

- 3.450 Although the Council does not consider it suitable for development due to its overall nature conservation interest, this is based on a generalised assessment in the CGBR (Dec 2007) and not any authoritative technical study of the site itself. Moreover, the site is not subject to any formal designations at present. Nor are there any plans or firm proposals for its use or acquisition as public open space for example. In fact, a recent detailed ecological analysis has identified the valuable features as the peripheral trees and hedges, especially along the Duggins Lane frontage, together with the brook which functions as a wildlife corridor, rather than the site's somewhat overgrown central vegetated areas.
- 3.451 Given that the important elements of nature conservation interest could be retained with suitable buffers in any event, and perhaps as part of an area of open space serving an overall scheme, there is, in my judgement, clear potential here for a joint/comprehensive development with the adjoining reserved land to the south (whether or not vehicular access is shared). Taken as a whole, such a scheme would be capable of contributing a further 20 or so dwellings in total and make more effective and efficient use of land in this locality, whilst still effectively safeguarding the local ecological value of the site.
- 3.452 This would also facilitate a co-ordinated FRA in relation to the Canley Brook to address local surface water drainage issues. These have arisen particularly since a significant flooding event in December 2008 that followed the completion of the new bridge over the railway to the east of the site. In such circumstances and with no evidence of any other material constraints to development, I therefore consider that it would be suitable and appropriate for this land to be added to the new housing reservation south of Duggins Lane, with Table 3 amended to replace "50" with "70" and the PM changed accordingly.

Land South of Duggins Lane [Samuel Smith site – Rep. no. 1095]

- 3.453 Lying between the railway and Duggins Lane with a reserved housing site to the east and a long ribbon of single plot depth housing to the west along the road is a flat, largely open, field crossed by an overhead electricity line and bounded by hedges. In the south east corner is a pond, designated as a LWS that is home to great crested newts. The Canley Brook, a wildlife corridor, runs along the site's northern edge south of Duggins Lane.
- 3.454 Despite evidence of flooding at times, notably in December 2008, the EA advises that the site is in FZ 1, although a detailed site specific FRA would be required for any new development. The EA also states that it forms part of a groundwater source protection zone, albeit that this does not necessarily preclude development.

- 3.455 The land is in one ownership and readily available, as well as close to Tile Hill Station and not too far from the limited range of local services in Tile Hill village. It is also of sufficient size to provide a suitable mix of size and type of new housing. Clearly, the potential noise impact on any new development here would be effectively no different from that affecting the reserved housing site to the east and thus, in my view, not an overriding constraint. A similar conclusion applies in respect of the present overhead electricity line, as it could be put underground albeit at some cost.
- 3.456 The Council acknowledges that this land forms part of a larger parcel judged to be one of the least constrained in terms of meeting the objectives of GB designation in and around the city in the JGBS. Notwithstanding, I endorse the further judgement of that study to the effect that this site is visually part of the open countryside and lies clearly outside the present built form of the city. In my opinion, this is best appreciated from the elevated bridges at Tile Hill Station and on Station Avenue where the further extent of open land to the north, west and south provides the site's wider landscape context.
- 3.457 As a result, new housing on this site would not only breach the logical new north to south built up area and GB boundary to be established in this vicinity but also constitute a material visual intrusion into a prominent part of the Meriden Gap on this edge of the city. Of equal importance, in my view, it would also mean the coalescence of the city's built up area with the currently separate ribbon of housing along the southern side of the lane, thereby exacerbating its harmful impact. To my mind, it would give the impression of continuous built development extending west out from the city almost to Nailcote Lane compromising the current separateness of the city from development in Solihull district and, significantly, the public perception of the width of the Meriden Gap in this sensitive location.
- 3.458 In this instance I consider these objections to be compelling and to outweigh any outstanding need for new housing sites in and around the city to meet the RSS requirement. Accordingly, I agree with the Council that this land should not be removed from the GB or identified for new residential development in the plan period.

Land North of Duggins Lane [William Davis site - Rep. no. 1054]

- 3.459 Land to the west of Nailcote Avenue and north of Duggins Lane comprising largely open flat fields, enclosed by strong boundaries and south of an area of playing fields, is put forward for new housing by representors. It is owned by a developer, readily available, and of sufficient size to make a meaningful contribution to new housing needs, as well as suitable for elements of both affordable and executive housing. It is located close to Tile Hill Station, within a reasonable walking distance of the local services in

Tile Hill village on the edge of the existing built up area of the city and thus in a relatively sustainable location.

- 3.460 It is common ground that a satisfactory vehicular access to serve residential development could be provided from Duggins Lane, albeit some of the present frontage hedge would be lost to provide suitable visibility splays in both directions. Despite the evidence of recent local flooding in the vicinity, notably in December 2008, the EA confirms that the site lies within FZ 1, although a site specific FRA would be necessary prior to any development with particular attention to the watercourse on the site's western boundary.
- 3.461 Whilst the land lies within a groundwater source protection zone, this would not imply that development is precluded for that reason and the available evidence indicates that all necessary services, including water supply and foul sewerage, could be provided without excessive cost or difficulty. Nor is there any known nature conservation or archaeological interest on the site, beyond the general biodiversity value of the existing trees, hedges, ponds and watercourses which could be retained. The railway line and station are also sufficiently far away, across Duggins Lane and intervening land, so that noise and vibration should not impose any significant constraints to new development.
- 3.462 The site was identified in the JGBS (CS/S7.7) as part of one of the "least constrained parcels" in and around the city and considered appropriate for more detailed analysis. Moreover, the present peripheral vegetation provides reasonable visual containment of the site, such as from Duggins Lane. Nevertheless, it forms part of a wider, largely open, swathe of countryside on the western edge of the existing built up area of the city in conjunction with land to the south on both sides of the railway and to the west and north, including the playing fields.
- 3.463 In my view, this area makes a significant contribution to the important Meriden Gap, where the local landscape is particularly sensitive to significant changes, such as a major extension of built development beyond the firm and clear boundary formed by the housing along Nailcote Avenue. It also lies outside any reasonable definition of a north/south corridor, on which the future strategic development of the city should be focussed during the plan period.
- 3.464 I therefore consider it important that the larger strip of GB land of which this site forms part on this western edge of the present built up area and within the city boundary, west of Nailcote Avenue and Cromwell Lane and including the sports ground to the north, should be retained to avoid unnecessary urban sprawl. Development here would also contribute to coalescence with the ribbon of housing on the southern side of Duggins Lane, thereby exacerbating the harmful impact of such development on the overall integrity of the sensitive Meriden Gap.

3.465 The availability of alternative sites in and around the city, albeit including some that are within the GB at present, that would not give rise to the same harm to the Meriden Gap reinforces the conclusion that there is no overriding need to justify the release of this site for new housing in the plan period. In such circumstances, I endorse the Council's judgement that this site, despite being in a sustainable location, should be retained in the GB, rather than allocated or reserved for new housing.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs) -

Table 3 - add new allocated site - Land at Plots 10, 11 and 12 Banner Park – PDL – 100.

Table 3 - amend Land at Duggins Lane from "50" to "70" and alter reserved site allocation on PM.

Amend GB boundary in accord with above.

Matter 14 - Key Diagram/Proposals Map

Issue 84 – Does the Key Diagram [KD] need to be changed and, if so, why ?

3.466 The Council acknowledges that certain minor changes are required to the originally published/submitted version of the KD for clarity and consistency, as now shown on a revised version in the FPCs. These include showing the full extent of the GB around the city, as agreed to be useful at the examination, as well as proposed locations for Park and Ride and country parks. I endorse all these minor changes as helpful in providing a better explanation of the spatial implications of the proposals in the CS for readers of the document and they should be included in the adopted version.

Issue 85 – Should it show cross boundary directions for growth of housing and employment and/or the Meriden Gap ?

3.467 In contrast, I do not support the view that it is necessary or desirable for the CS to include any specific or direct indications of potential cross boundary growth, either in terms of location or scale, direction or numbers, on the KD. To my mind, whilst it is helpful to clarify which areas are not subject to consideration for such provision, notably land in Solihull and Rugby districts, this is already effectively achieved in the text.

3.468 Moreover, I consider that it would be entirely inappropriate for the Coventry CS to be site specific about land in Warwick and/or Nuneaton/Bedworth districts. In particular, and in the latter case at least where not even preferred options have been put forward as yet, such choices must ultimately be left to the respective CSs (or other DPDs) to be prepared by those Councils in due course, for legal/procedural and public consultation reasons alone.

3.469 Any specific indication in the CS, no matter how indicative or diagrammatic, would, in my opinion, be taken as a pre-judgement by the City Council and potentially others of the difficult and controversial decisions that have yet to be fully analysed and consulted upon, as required by the spatial planning process. In conclusion, I do not endorse the suggestion that the KD be further amended by the addition of any form of specific indicators of growth in relation to land in adjoining districts, given the clear and concise explanation of the issues arising from the RSS Phase II Review and Panel Report in the text of the document.

3.470 Regarding the Meriden Gap, as I understand it, this has never been formally defined on a plan and it is not the role of the CS to do so via this examination given that the vast majority of the area (however it is defined) lies outside the city. I am satisfied that the addition of the areas of GB all around Coventry to the KD is sufficient to give a clear expression of the relationship of the existing built up area of the city with the open countryside to the

west that divides it from Solihull (and Birmingham). In such circumstances, I see no need for a change to the KD in this respect.

Issue 86 – Does the Proposals Map show the appropriate information or should anything be added, deleted or moved to the Key Diagram ?

3.471 I agree with the Council's latest view that some of the information originally intended to be on the PM should (also) be shown on the KD. In particular, this applies to the addition of the A45/A46 junction improvements at Tollbar Island, on the south eastern edge of the city, planned by the HA. Although not directly a matter for me, I also acknowledge that, on the basis of the more up to date information in the Council's Housing Topic Paper (CSTPO1) another eight sites should be shown on the PM for accuracy as listed therein, together with cross references to Tables 2 & 3.

Recommendations

The following changes are required to make this part of the CS sound: – (in addition to the Council's FPCs) -

Key Diagram - amend the Council's revised version to accord with all the other Recommendations in this Report.

Proposals Map – amend to accord with all the other Recommendations in this Report.

4 Minor Changes

- 4.1 The Council wishes to make several minor changes to the submitted DPD in order to clarify, correct and update various parts of the text. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy. These changes are set out in Annex 2. I endorse all of the Council's "Editorial Changes" (CS0.2B) to the original text of the CS as minor amendments that do not alter the intent or meaning to any material extent and all should be included in the adopted version of the document.
- 4.2 This includes the change of description of the areas/sites currently in the GB to be identified in anticipation of future local housing need from "Safeguarded" to "Reserved" Land. Whilst acknowledging that this is perhaps a more significant change than all the others, it simply reflects an error on the part of the Council in their original choice of term to apply to such land for descriptive purposes in the CS. It does not imply any change of intention, on the Council's behalf, in relation to their land use planning status over the plan period or the phasing/timing and mechanisms through which they might come forward for new housing development in the future. In such circumstances, I am content to adopt the change as a mere clarification that would also more closely accord with national planning guidance in PPG 2, and similar practice elsewhere in the country, regarding such GB sites.
- 4.3 I also endorse and formally recommend for inclusion in the adopted version the Council's "Focussed Changes" (CS0.2C) on the following matters: - a) Table 1 (pages 23/24) to provide further explanation of the specific policies intended to deliver the themes of the SCS; b) the amendments to Tables 2 (page 41) and 3 (page 44), Map 3 (page 45) and paragraphs 6.30 (page 42), 7.24 (page 77) and policy EQ2 (page 80) consequent upon the deletion of the formerly proposed new housing land allocation at Lentons Lane that is now known to be undeliverable, largely due to former mining activity on the site; c) the additions to Appendix 1 (pages 128 – 132) to clarify which policies of the Coventry Development Plan (CDP) (CS9) would be "saved", and which not, once the CS is adopted.
- 4.4 Consequent changes to the PM are a matter for the Council to address separately upon adoption of the CS. Some of the other "Focussed Changes" (CS0.2C), including those concerning housing numbers in paras 5.12 and 5.13 (page 29) and Table 2 (page 41), are not necessary in the light of my other recommendations.
- 4.5 With regard to the Council's "Further Proposed Changes" (FPCs) (CS0.2D) I endorse them all as useful clarifications and additions and formally recommend their inclusion in the adopted CS, including those relating to Maps 1, 4, 5 and 6 and the Key Diagram, with the exceptions set out below.

- 4.6 Policy SG14 [page 1, point 3 of CS0.2D] – In relation to the estimates of new jobs to be provided over the plan period in the two universities and the hospital, I agree with those who suggest that both the totals and percentages seem very likely to prove over optimistic. This is especially so given the effects of the recent recession on job prospects in the public sector, including education, and particularly in the short to medium term. The various references throughout the CS, notably in policy SG14, need to be omitted accordingly, as recommended elsewhere in this report, rather than just clarified as put forward in the Council's FPCs.
- 4.7 Policy SG13 [page 2, point 3] – The Council's FPCs to this policy, to address criticism of the practical application of the policy wording by introducing criteria into the second part, provide an important clarification, without which it would be essentially inoperable in a development management context. However, to be readily workable, the policy should oppose those schemes that fail to comply with any one of the new criteria set out in the second part of the revised policy, rather than all three. Thus, the second part of the policy needs to be reworded in accord with the relevant recommendation rather than the FPC.
- 4.8 Para 6.39 [page 3, point 4] – The Council's suggested addition of a new second sentence to this para concerning the derivation of the boundaries of the "maximum developable plots" shown on the PM for the proposed eco suburb is an over-complication that is not needed in a CS. This is particularly so given the acknowledged necessity for a "master planning stage" that will almost inevitably lead to some changes, even if only minor in extent. In such circumstances, I see no justification for the CS or any policies therein to be overly prescriptive about the form and layout of the proposed eco suburb, especially when it is not anticipated that built development will commence for at least 5 and possibly up to 10 years from now. It should instead be amended to refer only to the overall boundary of the proposed eco suburb as recommended. The same applies to the PM.
- 4.9 Para 6.78 [page 3, point 6] – The title of this para should be amended to "Promote the City Centre as a major office, retail, cultural and leisure destination" for accuracy, in preference to the Council's FPC.
- 4.10 Policy EQ1 [page 3, point 7] – The Council's FPCs seek to amend the wording of parts of this policy for consistency (e.g. "or" not "and" in the third bullet point) and to more closely accord with national guidance (e.g. PPS 1 and PPS 5). However, they are not comprehensive and require further amendment if they are to operate as intended in development management terms. The first line, as well as the third bullet point, should also be changed to read "respect or enhance" and the words "from unsuitable development" need to be added at the end of the second sentence for clarity. For accuracy and consistency the penultimate bullet

point should read “conserve, restore or enhance biodiversity; and” with the final one saying “respect or enhance landscape quality, including existing trees and hedges of value.”.

- 4.11 Policy EQ2 [page 3, point 10] – The transfer of the first sentence of the fourth para to policy EQ3 is logical. However, given the desirability of avoiding unnecessary and premature precision on the PM in relation to the proposed eco suburb the second sentence should be amended as follows: “An extensive Country Park will be provided at Keresley to improve the quality, accessibility and long term conservation management of the retained GB and this part of the Ancient Arden landscape on the edge of the city,” rather than using the Council’s FPC here.
- 4.12 Paras 5.10 and 5.12 [page 4, points 2 & 4] – The Council’s FPCs to these paras are not consistent with the relevant recommendations made elsewhere in this report.
- 4.13 Para 5.25 [page 4, point 6] – The national CIL regulations have now been made available and therefore the second sentence of this para should simply be omitted, rather than amended as in the FPC.
- 4.14 Policy SG4 [page 4, point 13] – Taking into account the debate at the examination on this matter, I am fully satisfied of the overriding need to identify a new site in the CS to replace the existing EfW plant within the plan period. An extensive site search, including areas outside the city, convinces me that this can only realistically be on adjoining land, currently within the GB, albeit in one of the GW areas within the existing built up area of the city. In such circumstances and anticipating the practical and procedural difficulties that might otherwise arise in implementing such a scheme, particularly in a reasonably short timescale, I fully endorse the removal of the proposed site from the GB in these very special circumstances and its allocation for a new EfW plant in the CS.
- 4.15 I also recognise the clear desirability of the restoration of the site of the present plant to open space once the new one is operational so as to compensate for the loss of part of the present allotments in the GW/GB. However, it is not essential that this area be formally included in the GW/GB for it to perform the open space function sought in the long term, particularly as it would be protected from any unsuitable built development by policies EQ3 and EQ4 of the CS, amongst others. Accordingly, rather than the Council’s FPC, policy SG4 should be reworded as recommended.
- 4.16 Para 7.28 [page 5, point 3] – In the light of my recommendation in relation to policy SG4, the FPC to add further wording to the last sentence should not be pursued as put forward, albeit some further explanation, as suggested, would be helpful to support the policy. Accordingly, the penultimate sentence should stop after “belt” and the last read as follows: “Through the removal of the existing

facility and the reuse of the land for public open space, the integrity of the Sherbourne Valley Green Wedge will be retained.”.

- 4.17 Para 7.45 [page 5, point 8] – The suggested extra sentence at the end of this para is a statement of the obvious and does not need to be included in a CS.
- 4.18 Para 7.48 [page 5, point 10] – Similarly, the suggested additional sentence about the current waiting list for allotments does not merit inclusion in a CS, if only because it is likely to change materially over time and has no direct bearing on the policy standards.

5 Overall Conclusions

- 5.1 I conclude that, with the amendments recommended, the Coventry Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the tests of soundness in PPS 12.

Nigel Payne

INSPECTOR

Annex 1 - Abbreviations

AA – Appropriate Assessment

AAP - Area Action Plan

AMR - Annual Monitoring Report

AWM – Advantage West Midlands

BSF – Building Schools for the Future

CD – Core Document

CGBR – Coventry Green Belt Review

CIL – Community Infrastructure Levy

CS – Core Strategy

DPD – Development Plan Document

DPH – Dwellings per Hectare

EA – Environment Agency

EfW – Energy from Waste

EH – English Heritage

EIA – Environmental Impact Assessment

ES – Environmental Statement

FPC – Further Proposed Change

FRA – Flood Risk Assessment

GB – Green Belt

GW – Green Wedge

HA – Highways Agency

HCA – Homes and Communities Agency

JGBS – Joint Green Belt Study

LDD – Local Development Document

LDS – Local Development Scheme

LTP – Local Transport Plan

MDC – Major District Centre

MSA – Mineral Safeguarding Area

MUA – Major Urban Area

NE – Natural England

NGP - New Growth Point

NUCKLE – Nuneaton, Coventry, Kenilworth and Leamington Spa

PDL – Previously Developed Land

PM – Proposals Map

PPG – Planning Policy Guidance

PPS – Planning Policy Statement

PSA – Primary Shopping Area

RSS – Regional Spatial Strategy

SA – Sustainability Appraisal

SCG – Statement of Common Ground

SEA – Strategic Environmental Appraisal

SFRA – Strategic Flood Risk Assessment

SHLAA – Strategic Housing Land Availability Assessment

SPD – Supplementary Planning Document

SPZ – Special Protection Zone

SUDS – Sustainable Urban Drainage System

WCC – Warwickshire County Council

Annex 2 - Schedules of Minor Changes put forward by the Council

CS0.2B – Schedule of Editorial Changes

CS0.2C – Schedule of Proposed Focussed Changes/Points of Clarification

CS0.2D – Schedule of Further Proposed Changes (FPCs)