

TCG Submission to The Inspector in response to questions raised in Section 7c

1. What is the current planning status of this site

The land on this site is currently designated as Green Belt Land. It was assessed as high performing Green Belt in the recent Joint Green Belt Study of June 2015, commissioned by local councils. This land is assessed as "... *having the characteristics of the countryside, contributing to the setting of the historic city of Coventry....*". It fulfills its objective of separating Coventry and Kenilworth. It preserves openness visual amenity and landscape and is presently high quality agricultural land.

2. How does it fit within the overall spatial strategy

The proposal to remove this land from Green Belt runs counter to the Government's Green Belt policy established to protect the landscape, visual amenity, openness and limit urban sprawl around towns and cities

Damage to this area on the outskirts of Coventry is exacerbated by nature of the cumulative actions of removal of other areas of Greenbelt for employment land in the immediate vicinity at Whitely South and the area to the south east of Coventry Airport. Re-designating all three areas of high performing Green Belt at the same time that HS2 will also utilise large areas of land in this area will have a huge cumulative and damaging effect.

The proposed policy, DS10, on the Broad Location of Allocated Housing Sites is contrary to National Greenbelt policy

There are existing transport issues that have not been identified by WDC in their Traffic Assessment. There are major traffic problems around Stoneleigh Village and the University and no comprehensive plan to allow proper access to events at Stoneleigh Park. In a recent briefing, to Stoneleigh and Ashow Parish Council, officers of WDC stated that they were not aware of any existing traffic issues in the local area around Stoneleigh Village but subsequently there has been suggestions that WDC and the LEP are seeking funding to build a traffic relief scheme from Stoneleigh Village to the M42 via the A46. This apparent contradiction suggests that further rigorous analysis of the traffic situation should be conducted before any decision to allow development of this land is made.

Removal of the land at King's Hill from Green Belt is contrary to Government Policy and would set a precedent. The housing needs of a neighbouring council and the duty to cooperate do not fulfill the requirement of exceptional circumstances.

Coventry City Council's (CCC) aspiration to create employment and housing sites on the outskirts of the city is illogical. At present Government policy is to prevent the coalescence between cities and nearby towns and villages. A city requiring both employment land and housing land outside their boundary does not meet the exceptional circumstances required to re-designate high performing Green Belt land into development land. This is not sustainable and would create a precedent for other towns and cities to expand into the surrounding Green Belt. Any change to existing rules and policy should not be made by Local Councils but by Government.

3. In addition to housing provision, are there other benefits the proposed housing benefits would bring?

None

4. What are the potential adverse impacts of developing this site? How could they be mitigated?

- Urban Sprawl
- Removal of open landscape on the edge of a city
- Damage to rural landscape
- Damage to the visual amenity

- Reduction of the openness of the area
- Coalescence of Coventry and Kenilworth
- Increased traffic congestion

Serious mitigation is difficult to achieve for all the above points. However traffic congestion could be mitigated with sufficient investment. However the funding required would be huge. A detailed and funded plan to deal with the traffic issues would need to be drawn up and put out for consultation. This has not taken place and consequently it is inevitable that the proposed development of this site will lead to increased congestion. The two firm proposals to create a segregated junction at the Stoneleigh Road/A46 junction, together with traffic lights on the Stoneleigh Road/A 4115 junction are welcome and will improve access to and from the A46. However they will have no positive effect for congestion on local roads and the segregate junction could actually make matters worse.

5. What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Listed below are just some of the infrastructure requirements for a development of the scale proposed at King's Hill:

- Roads
- Hospital capacity
- Schools
- GP surgeries
- Station
- Playgrounds
- Shops and Pubs
- Drainage and water treatment

The total cost of this infrastructure is huge. Local press reports suggest that just on the road improvement/relief scheme alone the LEP might be looking to raise £150m. However no detailed analysis, budgeting or sources of funding have been provided by WDC.

Sources of funding could come from grants, the developers and CCC who will have large windfall profits from the land at Whitley South, South East of Coventry Airport and King's Hill becoming development land if the new Local Plan is adopted. However there has been no suggestion that CCC will contribute any funding to the provision of infrastructure or amenities even though this development is intended to meet the unmet housing demands of Coventry.

No decision on removing this land from Green Belt should be made until detailed analysis is conducted and the conclusions made available.

6. Is the site realistically viable and deliverable?

No

7. What is the expected timescale for development and is this deliverable.

Timescales are vague and dependent on whether the housing projections are accurate. The Council suggest that 17,000 houses can be built in the WDC area by 2029. King's Hill is only a part of this plan but if the demand isn't there the houses won't be built. The accuracy of forecast for housing demand are open to question. CPRE's submission to the inspector on Matter 2 analyses the accuracy of the overall provision for housing and details anomalies and inaccuracies.

Also, there is no evidence to show that private house builders and the Council together will be able to increase the construction rate of houses in order to deliver the requirement of the emerging Local plan which requires an increase to 932 dwellings per annum.

So there must be a doubt that the expected timescale is deliverable

8. What would the effect of the proposal on the purposes of including land within the Green Belt?

This area of Green Belt on the edge of Coventry is fulfilling its purpose as set out by Government Policy. The Joint Green Belt Study commissioned by local councils reinforces this assessment. Therefore removal of this land from Green Belt will have a significant detrimental effect on all the objectives that Green Belt designation sought to achieve. The proposal will inevitably degrade the openness, the landscape, visual amenity and also allow future urban sprawl.

The Joint Green Belt study states that the Green Belt in the local area fulfills its role to encourage the recycling of urban land and that significant areas previously used land remain in urban areas. Building on this area of sensitive and high performing will negate this effect.

Removing this large area of Green Belt in order to build a large number of houses is the easy option and preferred by developers but the correct but more difficult option is to develop the numerous smaller urban and Brownfield sites that are available within the region.

9. What would the effect on the openness of the Greenbelt?

Building this number of houses on an area of high quality agricultural land can only result in the destruction of the openness of the Green Belt at King's Hill.

10. Are there exceptional circumstances which justify altering the Green Bel? If so, what are they?

There are no exceptional circumstances that justify the altering of Green Belt at King's Hill. WDC attempt to justify this by citing duty to cooperate and housing needs of neighbouring Coventry City Council, but neither of these fulfill the exceptional circumstances as defined and required by Government policy.

The Government has consistently committed to protecting the Green Belt and has repeatedly confirmed that the single issue of unmet demand is unlikely to outweigh harm to the Green Belt

Other sites, both Brownfield and greenfield sites outside the Green Belt, are available and more suitable for development. Yet no robust and detailed appraisal of alternative sites has been carried out. There has been a lack of adequate consultation which renders the plan legally non-compliant. WDC are attempting to adopt a new Local Plan without delay because the existing plan is considerably out of date. However this does not justify the failure to carefully examine alternative sites and also examine infrastructure requirements that would justify and mitigate altering the Green Belt. Permanence is a feature of Green Belt and any decision to change its status should be considered carefully however it appears that the decision to develop King's Hill has been rushed into modified version of the emerging Local Plan without sufficient justification, consultation or planning.

In the Distribution of Development Strategy Paper HO25PM WDC (para 14) ask three questions in their approach to assessing Exceptional Circumstances:

Is there an essential need that has to be met? if yes....

The answer to this is No - There are serious doubts about the forecasts for Coventry's unmet housing need going forward (see CPRE submission to the Inspector on Matter 2)

Are there any suitable sites outside the Green Belt that can meet this need? If no....

The answer to this is Yes - There are many sites outside the Greenbelt in the south of warwickshire and many urban and smaller sites within Coventry

Is this the best site within the Green Belt to meet the need (taking account of the Green Belt study as well as other aspects of the site assessment)? If yes...

The answer to this is No - The Green Belt study made it absolutely clear that this area of Green Belt is higher performing and it's status should not be changed

So following WDC's method of assessing the presence of Exceptional Circumstances - it fails on all three counts