

## **Matter7c – Proposed housing allocations, safeguarded land and direction for growth**

### **- Edge of Coventry**

#### **Issue -**

Whether the proposed housing site allocations, safeguarded land and direction for growth on the edge of Coventry are justified, effective and consistent with national policy.

Policies **DS11, DS15, DS NEW1 and DS NEW2**

#### **Questions**

Taking each of the following proposed housing site allocations individually

- H08 – Oaklea Farm, Finham
- H42 – Westwood Heath
- H43 – Kings Hill Lane**

#### **1) What is the current planning status of the site?**

- It is GREEN BELT that separates Coventry from Warwick District
  - Agricultural
  - The ALVIS Sports facility which has a formal lease with CCC and there is 33 years remaining.
  - Ancient site. Of two Saxon villages.
  - Ancient woodland – Wainbody Wood which is part of the Ancient Arden Forest.
  - Ancient trees and hedgerows which have protection orders.
  - 27 ponds with crested newts and associated habitats
  - Bat colonies which are protected
  - Badgers setts
  - The only countryside for Finham residents for miles
- No known planning applications and the site has no formal planning status
- We are aware that a consortium of developers and landowners has set out plans for development but these are no formal applications.

#### **2) How does it fit within the overall spatial strategy?**

- It does NOT because the **main** WDC Local Plan shows small developments with infrastructures either in place or suggested. Local residential areas are taken into account.
- H43 takes an area as described in Q1 and suggests **4000** dwellings with additional schools, roads, employment, community facilities etc;

- No consideration has been shown to the local isolated area of Finham with 1936 dwellings which will be adjoined to a development at least double in size
- The plan for H43 is totally out of keeping with the overall WDC Local Plan.
- There is no indication that alternative sites which could have been more suitable were considered to absorb Coventry's overspill.
- There needs to be a reassessment of Coventry's housing figures as questions have been raised about the validity.
- Alternative sites to H43 should be considered in the Local Plan before it is passed.

### **3) In addition to housing provision, are there other benefits that the proposed development would bring?**

- Finham Residents have not been involved in discussions so are only aware of the Scoping Proposals from Savills on behalf of Lioncourt and the Statement of Common Ground published in September 2016 on behalf of Lioncourt, Blue Mark projects Ltd and the Deeley Group.
- None of the proposals would benefit the people of Finham who have not been considered by either WDC or CCC.

### **4) What are the potential adverse impacts of developing the site? How could they be mitigated?**

- **Key impact will be on the sewerage treating capacity and water supplies**
- Question – has Severn Trent increased the capacity on the site for both processes since 2010? (the Environment Agency stated that the site was up to capacity for sewerage treatment in 2010)
- The site slopes down towards Green Lane which already floods and housing will substantially increase that risk.
- The land contains substantial gravel which at the moment allows water to soak away but any building will affect the water tables and lead to increased flood risk.
- The proposed development would lead to increased surface water run offs from roofs and roads and this will impact on Finham Brook.
- In addition to this, the increased treated sewerage effluent will also feed into the local river system. This has implications for flooding in Stoneleigh.

- How will Finham Water Treatment facility increase capacity to cope?
- The bore hole on the proposed site is used for local water supplies. There is a limit to how much can be obtained from this source.–
- Additional building will affect the Water tables and could contaminate the bore hole water. Severn Trent has classified it as a 44 day source. This means that there is a 44 day period between any pollutant entering the bore hole and coming to the tap.
- In the late 1980's there was a serious incident when weed killer used on the railway line entered the water supply.
- As a result, Severn Trent introduced activated carbon filter processes to reduce the effects should this occur again. This shows that local water could ingress into the Bore Hole Water.
- Where is Severn Trent going to get the increased required water from?
- There are buried Services for gas, electricity, petroleum, drinking water and raw sewerage across the land of Kings Hill.
  - Two main gas pipes
  - An 18" diameter water main which links Birmingham and Draycote Water. This provides supply in either direction should there be a sudden high demand
  - a petroleum pipeline,
  - A main electrical supply cable,
  - Two high pressure raw sewerage pipes.
  - There is also a coal seam that crosses the site. This is from the Daw Mill Colliery to Oxfordshire.
- There will be an adverse affect on the environment and established habitats. The scoping proposals put forward by Savills talk about 'mitigation measures'. These refer to moving established habitats when they consider it necessary. Environmentalists have shown that this is not feasible since it will result in the destruction of species.
- There will be an adverse impact caused by traffic flow from the site.
- Leasowes Nursery which is owned by CCC is being 'offered' to WDC as building land for houses or a potential road as suggested in the Scoping Report by Savills.
  - This is an important part of the horticultural community.
  - It provides work for people with disabilities and their lives would be disrupted if this land is sold for housing.
  - They enjoy and are proud of their work which gives them a purposeful independence.
  - Their rights should be safeguarded by the Disability Discrimination Act.

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

- The physical constraint to the site is **ACCESS**.
- Green Lane is a narrow road already overused and unable to sustain local traffic. The potential Kings Hill development could see up to 7,200 additional cars using it on a regular basis. (Discussions on the Green Belt at the CCC Examination use the formula 1.8 cars per household) .
- Has a traffic survey been undertaken at peak times?
- There is no access from the site onto Green Lane without demolishing protected ancient hedgerows. The proposals by Savills to create access to the development through the site that is Leasowes Nursery would be adjacent to the Finham Park Academy and be a potential safety risk.
- Kings Hill Lane is a single track road in places and not suitable for increased traffic flow.
- ALL traffic from the site would have to be via Kenilworth Road and Stoneleigh Road. Use of Green Lane is not feasible for the reasons above.
- [Ask Ian Kemp if he can tell us if the Inspector has seen the siteH43? Has he seen it with local residents who can best describe the real situation?](#)
- There is no simple way to overcome these issues and yet deliver the high amount of suggested building.
- The physical restraints to development on this site are as follows:-
  - **Wainbody Wood is an Ancient Woodland** – The National Planning Policy Framework (NPPF) paragraph 118 states that 'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodlands, unless the need for, and benefits of, the development in that location clearly outweighs the loss.'
  - National Policy is supportive of absolute protection of ancient and trees. This should be taken into account and no building permitted in this area.
  - We would say that this area should not be included in any plans. We accept that developers suggest building up to the edge of this site but they do not take into account the ancient hedgerows and trees
  - **Ancient sites** – remains of Saxon villages

- **27 Ponds** - crested newts
- **Protected species** - Badgers, bats and great spotted woodpeckers.
- Unique rock formations
- Has there has been a recent in depth Biodiversity study?

## 6) Is the site realistically viable and deliverable?

- NO because
  - H43 is not the easy option inferred by the information released to the public and by the Scoping report.
  - It is the **Green Belt** area that divides Coventry from Warwickshire –
  - Infrastructure would require decimation of ancient trees and hedgerows
  - The numbers of dwellings proposed represent a new small town and are not in keeping with the rest of the Local Plan
  - The water problems detailed in Question 4, the presence of protected species and geological sites all render this site to be un realistic to sustain the development suggested
  - The statement that only 1800 homes would be built in the first part of the Local Plan is unrealistic and not viable. The consortium and the scoping report show that the first phase would be against the boundary hedge of Green Lane. This would immediately destroy the Green Belt separation between Coventry and Warwickshire and cause all of the destruction to environment that has already been detailed. This would allow at a later stage the rest of the 4000 house to further destroy the area that is Kings Hill.
  - The development could add up to 7,200 cars onto the infrastructure that struggles to cope now.
- The scoping reports from the developers are based on desktop reviews and show no substantiated facts. Their proposals are largely based on guesswork without proof.

## 7) What is the expected timescale for development and is this realistic?

- We do not know the answer.
- There are various landowners for the site some of whom do not wish the land to be developed in this way. We have correspondence from Mrs Youell stating this.
- There is a 33 year lease on the Alvis site which has been guaranteed by the Leader of CCC.
- A suggestion that 1800 houses be built in the first phase is equally not deliverable because the first houses built on this land will cause the destruction and all of the problems that we have outlined before.

**8) What would be the effect of the proposal on the purposes of including land within the Green Belt?**

- The proposals destroy the last remaining green belt area between Finham (Coventry) and Kenilworth (Warwickshire)
- It will create an urban sprawl
- Finham has no green spaces to even provide basic play facilities for the local population. There is no land for a Community centre or allotments. CCC has failed to provide these in the past but is now offering to sell the Green Belt land that it owns in Warwickshire to WDC for development.
- Coventry owned land such as Leasowes Nursery is GREEN BELT

**9) What would be the effect on the openness of the Green Belt?**

- There will be no Green Belt if the current proposals are allowed.
- The only way that openness can be sustained in some way is to move any proposals to the far side of the site near to the Kenilworth road / Stoneleigh Road thus preserving a Green Belt divide between the two Authorities.

**10) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?**

- NONE
- The only people to look for justification are-
  - CCC who want to sell their land for instant revenue. There is a suggestion that they will then apply for a Boundary change to 'GROW' Coventry and gain the Council Tax.
  - The developers who have a financial interest with little concern for local residents in Finham who will be the people adversely affected by WDC proposals.