

Issue 1: Strategic Policy SA1 – Development Principles on strategic Sites

In response to Q48, this approach is justified. According to the State of Nature report (2023), 'the UK is now one of the most nature-depleted countries on Earth and 'despite progress in ecosystem restoration, conserving species, and moving towards nature-friendly land and sea use, the UK's nature and wider environment continues, overall, to decline and degrade.' Put simply, we cannot afford to let our local wildlife sites (LWS) degrade through the pressures from growth and urbanisation. They are essential for nature recovery. We should be taking every opportunity to enhance them through restoring their habitats and improving the wider ecological networks' resilience through extending existing sites and creating more. Therefore, although buffers are important, they are not enough. Wildlife corridors need to lead somewhere and it is a concern that, if strategic allocations are looked at in isolation, we could end up with 8m easements along the length of watercourses and LWS becoming isolated. The impact of fragmentation needs to be tackled as it leads to biodiversity loss. A surrounding inhospitable landscape will act as a sink into which organisms will go and are unlikely to return. Small isolated populations are more vulnerable to the impacts of storms, floods, droughts and pollution events and are unlikely to recover or be recolonised.

According to Paragraph 185 of the NPPF, in order protect and enhance biodiversity and geodiversity a Plan should,

185...a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶⁵; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶⁶;
and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'

In response to Q52, a requirement for compliance with SPDs and design codes is necessary and justified. Lack of compliance can lead to delays in the planning application process and undermine the Plan's policies. The Plan and its associated documentation, such as SPDs and design codes, go through a process of consultation with the public and consultees such as National Highways, Historic England, Environment Agency, Natural England, Lead Local Flood Authorities, National Grid, etc and so the end result of this process should not be disregarded at a later point in time.

Issue 4: Strategic Employment Allocations

For Q64, please also see the response to Issue 2. A requirement for a programme of archaeological recording is justified considering the sites' location near the River Sowe, the presence of high status moated sites, parkland, Medieval ridge and furrow earthworks and a nearby Roman road. On the Coventry Society's website, it states that,

'The name "Longford" is believed to relate to a "long ford" on a Roman Road passing through the district'

According to Warwick University's A-Z of Roman Coventry,

'Mandeussedum, road goes through Caldecote, Hartshill, Camp Hill, Nuneaton, Caldwell, Griff, Bedworth, Coventry Rd., Longford Rd and Foleshill Rd.'

'Gentleman's magazine 1793.

17th December, 1793, in meadow belonging to Mr Joseph Whiting at Foleshill, a pot containing 1800 Roman copper coins, principally of Constantine, Constans, Constantius & Magentius, was unearthed about 2' below surface in digging trench. On 12th January, in continuing same trench another pot containing a great quantity of larger coins was found. In 1792 farm labourers digging drainage ditches in a Foleshill meadow unearthed "an earthen pot containing upwards of 1,800 Roman copper coins, principally of the emperors Constantine, Constans, Constantius and Magentius". A second pot was dug up containing a larger quantity of better preserved coins. This Roman hoard which must have contained more than 4,000 coins was buried near the Old Leicester Road, the Foleshill Road. The hoard would not have been buried in the middle of a forest but at an identifiable spot, by a road. Foleshill Road may have its origins in the Roman period.'

The site of the 'Foleshill Coin Hoards' (Coventry HER, MCT154) is believed to be located near to where the Church of St Laurence is now.

In response to Q65, a contribution towards increased personnel and vehicles for Warwickshire Police is justified. As referred to previously, the scale of development in the areas surrounding M6 J3 is approaching that of an SUE. There will be a marked increase in population and the area will inevitably become more urbanised. In addition, there will be pressures created within the area due to employee shift changes at distribution centres which are likely to be run on a 24 hours-a-day, 365 days-a-year basis. Due to these changes and the proximity of M6 J3 (County Lines), there are likely to be more incidents of crime and issues with transport to manage.

Strategic Policy SEA2 – Wilsons Lane

In response to Q68, there should be more flexibility regarding the provision of housing. SEA2 is well placed to contribute towards Coventry's unmet need in the future or shortfalls in housing supply that NBBC may have itself. It is important to retain the northern parcel of housing to maintain the established pattern of residential development along Wilson's Lane. Taller buildings located here would be incongruous in the street scene. There would be more flexibility if the housing element were larger and B8 was reduced to be equivalent to the size of Exhall Gate (or removed entirely). With a larger housing element, it would be possible to deliver wider community benefit, such as providing a playing pitch, orchard and/or allotments, enable onsite 10% biodiversity net gain, have less impact on Bassford Bridge Meadow LWS (Sowe Meadow) and better accommodate the site's constraints. Hedgerows and mature trees could be retained and the existing route of the B25 could remain as it is.

Within the 'form of development' section it refers to locating 'larger B2 and B8 uses to the west of the landscape corridor on the lower ground, with smaller scale development on the more visible higher ground' But, do references to the topography of the site need to be addressed in more detail? In this location, large scale buildings, which require level floors, are likely to require substantial piling and remodelling of the landscape. Would it be acceptable to build a bank near the river and remove soil (and possibly

bedrock?) close to residential properties? Therefore, it is surprising that the provision of cross-sections has not been included as a requirement within the policy. Should it also be a requirement to investigate the impacts of such works on the River Sowe, groundwater and existing properties? Therefore, is it possible to strengthen the policy's wording regarding this and to add in a requirement for cross-sections? Could the extent of landscape remodelling have an impact on commercial viability? Is it possible that a developer may later claim that they cannot afford to make financial contributions due to this? A larger housing element would be able to accommodate the site's change in levels without having to resort to extensive landscape remodelling.

There is also no reference to the management of soil within the site. Considering that sections of the site contain Medieval ridge and furrow, should this not be referenced? Other local authorities are now protecting their Medieval ridge and furrow, not because of its historic landscape value, but because they recognise its value in establishing meadows for nature recovery. Could the wording within the policy be modified to include a section on soil? Should there be a section on soil elsewhere within the Plan? A larger housing element would be better placed in preserving areas of Medieval ridge and furrow within its layout and utilise its soil within gardens and landscaping.

Within the 'form of development' there is a reference to the provision of 'a wayleave for the electricity pylons through the site' and that 'scheme layouts need to take into consideration potential stand-offs and easements associated with the overhead power line, and early discussions with National Grid are essential in informing any detailed layout...' However, there appears to be no reference to the 700mm diameter distribution main which runs through the central region of the site and its 3m easement either side of the centre line. What would be the costs of diverting it and who would be impacted by this while works were completed? Could the cost of diverting a distribution main have an impact on commercial viability? Is it possible that a developer may later claim that they cannot afford to make financial contributions due to this? Could the wording of the policy be modified so that presence of the distribution main is highlighted and that there would need to be early discussions about this with Severn Trent. A larger housing element would be more able to accommodate this main and its easement zone without the need to divert it.

For Q67 and Q69, please refer to the previous representation for the Regulation 19 Consultation.

Strategic Policy SEA6 – Bowling Green Lane

For Q80, Q81 and Q82, please refer to the previous representation for the Regulation 19 Consultation.