
STATEMENT SUBMITTED ON BEHALF OF WILLIAM DAVIS LTD (862) HEARING SESSION 8: GREEN BELT

1. Green Belt

a) Is the proposed development on Green Belt land justified? Do exceptional circumstances exist which justify an alteration to the Green Belt boundary to accommodate new development which the Council says cannot be met elsewhere?

In their submitted representations William Davis Ltd (WDL) welcomed the explicit acknowledgement in the Local Plan that planning to meet the identified development needs in the period to 2031 will require the release of Green Belt land around the city for development. That reflects the reality that the Green Belt tightly constrains the urban area, and that the capacity of the available land within the urban area is ultimately limited and would not accommodate the scale of development required to meet identified needs, or indeed, the type and character of development required to meet the identified needs of specific parts of the city's population. The Local Plan also highlights (page 92) that the *"development needs of the Housing market area cannot be accommodated in the existing urban areas of Coventry and Warwickshire."* All of the local authorities have therefore, committed to reviewing their Green Belt boundaries.

WDL, therefore, support the approach to the review of the Green Belt in the City and the proposal to allocate sites for development as set out in Policy GB1. The justification for this approach as set out in the supporting text in the Local Plan is entirely appropriate. Without a release of Green Belt land around the city for development the identified housing and employment needs would not be met in a sustainable manner close to where they arise. Indeed, it is likely that the Objectively Assessed Need for the Housing Market Area (HMA) would not be met at all. That would have dire socio-economic consequences for the city and its residents.

Those are the exceptional circumstances required to justify the release of Green Belt. The approach the City Council have taken reflects national planning policy as set out in the NPPF (paragraphs 83 & 84) and is entirely justified.

b) Has an adequate assessment of Green Belt purposes been undertaken?

The Green Belt around the city and potential development sites within it have been assessed on a number of occasions and most recently in the LUC Joint Green Belt Study (2015).

A key concern with the use of these studies is that they have all considered potential development sites as parts of large (often heterogeneous) land parcels. Given the scoring approach to the assessment of the purposes of the Green Belt used in the LUC assessment, the results can easily be skewed by how the boundaries of the land parcels are defined. The conclusions drawn do not therefore, necessarily reflect the specific attributes of any particular potential development site in respect of its role as part of the Green Belt, and the opportunities presented by those sites are not then properly considered. Consequently entirely appropriate opportunities for additional residential development within the City's administrative boundary have been inappropriately discounted by the City Council.

WDL also have some concerns with the actual scoring criteria used to assess the contribution of particular areas of Green Belt to the 5 purposes stated in the NPPF. Notably, the LUC Study

focuses in its review of Green Belt review criteria (page 13) on the presence or otherwise of ribbon development as an indicator of how the Green Belt performs in respects of restricting urban sprawl. However, that emphasis ignores how the respective land performs in respect of guiding the overall settlement pattern. It is considered that is more relevant to the checking of urban sprawl, rather than whether specifically ribbon development has, or has not, already taken place within the existing Green Belt. In the assessment submitted by WDL in relation to their site at Duggins Lane (Ref WE29), it was suggested that it would be more appropriate to consider:

“a) Would development on the site distort the settlement pattern and give the appearance of sprawl of the urban area from public vantage points?”

The LUC assessment also asks whether the land parcel is free from development, and whether there is a sense of openness? Openness in Green Belt terms relates to the presence of development whether it is visible or not, so the consideration of the perception of openness is unnecessary. Indeed, it is apparent from the assessment that in the application of these criteria it gives rise to some double counting with the consideration of the purpose of safeguarding the countryside from encroachment, which appropriately asks whether the parcel has the characteristics of the countryside, and whether it has been affected by the encroachment of urbanised built development?

c) Has adequate consideration been given to the need to promote sustainable patterns of development?

As set out above it is agreed that the exceptional circumstances exist to release sites from the Green Belt around the city, and part of the justification of that is the need to promote a sustainable pattern of development when seeking to meet the identified development requirements. That is meeting Coventry’s housing and employment needs as close as possible to where those needs arise. That will ensure that residents do not have to move away from their home area as a result of a lack of provision, or unnecessarily increase commuting between the areas, and allow existing infrastructure to be built on in order to optimise the accessibility to the high order services and facilities within the city.

The promotion of sustainable patterns of development does not form part of the Green Belt Assessments that have been undertaken. Related matters do appear to have been considered in the Coventry Green Belt Matrix prepared by the City Council in 2015, but the appraisal is unclear in its analysis and it is not at all apparent how its conclusions has affected the decisions made in relation to specific potential development sites rather than wider land parcels. Moreover, the consideration of discounted sites in the SHLAA is very brief.

As previously stated WDL are, therefore, concerned that the evidence base in relation to the assessment and selection of development allocation sites is not sufficiently transparent or indeed robust. There is no balanced consideration of the different aspects of sustainable development, and therefore, how a particular site might contribute to a sustainable pattern of development is not considered relative to the environmental constraints, including the potential impact on the Green Belt, which it may or may not be possible to mitigate.

As a consequence there are further entirely appropriate opportunities for additional residential development within the City’s administrative boundary that have been discounted by the City Council, notably on the edge of the urban area where they can clearly contribute to a sustainable pattern of development, and make an important contribution to addressing the shortfall in housing provision. As an example, William Davis’ site at Duggins Lane (Ref WE29) could provide between 70 and 80 market and affordable dwellings in an unconstrained (other than by Green Belt policy) and accessible location, that is arguably more sustainable than the nearby West of Cromwell Lane

allocation site, given it is a shorter walk to Tile Hill Station. It does not lie in a particular sensitive part of the Green Belt and the minimal harm that would result from its development can be appropriately mitigated, and would in any case be outweighed by the material benefit of providing additional housing in a sustainable location. Further detail is provided below.

d) Does the review of the Green Belt adequately support the release of part of it? Moreover, does the review of the Green Belt adequately support the release of those particular areas of the Green Belt proposed to be developed (identified in Policy GB1 criterion 3)?

Despite the concerns with the methodology used in the LUC study as outlined above, it is considered that the review of the Green Belt does still support the release of parts of it for future development. It has at least assisted in identifying relatively less sensitive parts of the Green Belt around the City, which can then inform the identification of potential development allocations.

It is, however, also necessary to consider the contribution that specific development allocation sites make to the purposes of the Green Belt, and as highlighted above, that can be quite different from the wider land parcel within which the site sits.

WDL's objections to the Local Plan included the submission of a Masterplan Report that related to their site at Duggins Lane. That included within it a Green Belt assessment that examined the specific attributes of their site and the nearby West of Cromwell Lane allocation site that is included in the Local Plan, rather than the wider land parcels in the LUC study. The scoring methodology was closely aligned with that in the LUC study save for a revision to address the concerns highlighted above. That assessment gave the Duggins Lane site a score of 11 (compared to 13 for the wider land parcel in the LUC Study), and gave the Cromwell Lane site a score of 13 (compared to 12 for the wider land parcel in the LUC study).

The site at Duggins Lane, therefore, compares favourably to the proposed development allocation at Cromwell Lane. The location and aspect of the Duggins Lane site, combined with the existing urban and landscape structure, mean that it does not form a particularly sensitive part of the Green Belt and its removal would not undermine the purposes of the wider Green Belt. The site relates well to an established residential area to the east and the urban recreation uses to the north. Its development would not result in an unnatural or sprawling urban form, but will instead form part of a logical and consistent settlement edge (particularly when placed in the context of future development on the allocated site at Cromwell Lane to the south). Moreover, there is no risk of physical coalescence with other settlements and in visual terms it is extremely well contained by a combination of the urban form, topography and existing vegetation, so the perception of encroachment or coalescence would be very limited. The landscape structure will also provide a clear and defensible long term Green Belt boundary.

Whilst WDL have supported the allocation of the land West of Cromwell Lane, this exercise serves to highlight the importance of also considering the site specific attributes of potential development sites and the potential for effective mitigation to be provided in a development scheme.

2. Reserved Land in the Green Belt

a) Do exceptional circumstances exist which justify further alterations to the Green Belt boundary to release additional land for housing and/or employment development, either within the Plan period or as ‘reserved’ land for development beyond the Plan period?

At Hearing Sessions 1 & 2, WDL presented the position that the shortfall in housing provision within the City Council’s administrative area represents a very significant risk in terms of ensuring that the OAN for the HMA is met within the plan period in accordance with the NPPF. Moreover, that the golden thread of sustainable development, as set out within paragraph 14 of the NPPF, starts by requiring the City Council to positively seek opportunities to meet its own needs, so that the scale of provision within the City Council’s administrative area is be maximised to the point where the adverse impacts would significantly and demonstrably outweigh the benefits of provision. The City Council accepted the principle of “optimising” the scale of provision in the authority area.

Moreover, it is apparent from the Memorandum of Understanding that the partner planning authorities also believe that the scale of overspill from the city should be minimised. Indeed, it is important to remember that (as highlighted above) if the overspill need from the city is to be met together with their own identified development needs in order to ensure that the OAN across the HMA is provided for in accordance with the NPPF, the partner authorities will also need to release land from the Green Belt for development.

On that basis it is apparent that the exceptional circumstances that justify the release of the sites proposed to be allocated in the Local Plan from the Green Belt (as set out in response to Question 1a above) equally justify further alterations to release additional land for housing and employment development to ensure that the development capacity of the city is optimised.

In that regard it is important to note that the Sustainability Appraisal of the Strategic Housing Market Assessment concluded that up to 27,000 dwellings could be provided before the consequent environmental impacts outweighed the socio-economic benefits. That clearly indicates that there is scope to increase provision within the City’s authority area by 2,500 dwellings in the plan period. It is the Council’s view that the merits of specific sites also need to be considered and that is why further allocations have not been proposed.

However, as set out above, WDL are concerned that the evidence base in relation to the assessment and selection of development allocation sites is not sufficiently transparent or indeed robust, and that there are further entirely appropriate opportunities for additional residential development within the City’s administrative boundary that have been inappropriately discounted.

For example, WDL’s site at Duggins Lane (Ref WE29) has been ruled out as a development allocation in the 2016 SHLAA on the basis of a very specific and localised issue relating to the nearby presence of a ribbon development in Solihull Borough to the west, and the shortening of the gap between that ribbon development and the edge of Tile Hill that would result from the site’s development. However, that concern can be readily mitigated through the scheme design and in any case the benefit of providing additional market and affordable housing to meet identified needs in a sustainable location would substantially outweigh any residual harm. Our evidence in that respect is set out in the Masterplan Report referred to above that accompanied WDL’s representations. In short the retention and potential enhancement of the mature boundary trees/hedgerows, set back of the built development behind the public open space as set out in the Masterplan Report, and the careful design of the proposed housing so that it relates to the existing housing within Tile Hill and contrasts with the distinctive frontage along Duggins Lane, will maintain the “buffer” and sense of separation between the settlement edge and the outlying ribbon

development. WDL suggest, therefore, that it would be entirely appropriate to remove the Duggins Lane site from the Green Belt and allocate it for residential development.

b) Would the development of the other area(s) be achievable within the Plan period, or should it/they be safeguarded for development beyond the Plan period?

WDL's site at Duggins Lane is relatively modest in size, but that enables its expedient delivery, and it would, therefore, make an important contribution of circa 70-80 dwellings (with associated public open space, landscaping, and pedestrian routes that connect to a currently truncated public right of way) to meeting the full objectively assessed market and affordable housing needs in the city in the short term.

On the basis of the site assessment work that has been undertaken (and presented in the Masterplan Report submitted with WDL's representations) there are no known environmental or technical constraints to the delivery of the Duggins Lane site. Should the site be included as a development allocation, WDL will prepare and submit a planning application following the adoption of the Local Plan. In that scenario it is anticipated that planning permission would be granted in late 2017 and that development of the site would begin in early 2018.