

Representor Reference No. 898
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Proposed Green Belt Changes

DRAFT COVENTRY LOCAL PLAN 2016 - Hearing Session 8

**Written Statement by David Lathbury MRTPI re draft Policies GB1,
GE1 and supporting text, and Green Belt related supporting text to
Policy JE:2**

Proposed Green Belt Changes

- 1 **The justification for the removal of the Green Belt designation from the Green Wedge areas of Coventry Green Belt does not meet the test of exceptional circumstances as required by Government guidance.**
- 1.1 The Government's National Planning Policy Framework (NPPF) (2012) re-states the five main purposes of Green Belt. These purposes were established originally by the Government in 1955 and subsequently maintained in Planning Policy Guidance Note (PPG) 2. NPPF reiterates at para 79 ...
"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."
- 1.2 The designation of Coventry's Green Wedges as Green Belt (they had been previously designated as Public Open Space in the Coventry Development Plan 1957) dates from the Coventry Structure Plan 1973. This Plan was approved by the Secretary of State in 1975 and an amendment in respect of housing and Green Belt approved in 1979. This approved the general extent of Coventry's Green Belt within the former County Borough area (i.e. excluding Allesley and Keresley which had previously been within Warwickshire). In his letter dated 10th August 1979 the Secretary of State specifically refers to the inclusion of the Green Wedges as part of the Green Belt in Coventry ('Notice of Approval, City of Coventry Structure Plan 1975, Alterations No. 1 Additional Land for Housing and the Extent of the Green Belt').
- 1.3 The West Midlands Structure Plan 1982, and the West Midlands Structure Plan Alterations 1986, also showed the extent of Coventry's Green Belt and included the Green Wedges. Policy ENV12 of that Plan stated that the general location of the Green Belt includes (as well as the area between the city and Birmingham):
"the following Green Wedges penetrating the built-up areas of Coventry:
 - *Coundon Wedge;*
 - *Whitley;*
 - *Tile Hill;*
 - *Stivichall;*
 - *Westwood;*
 - *Alderman's Green / Sowe Valley (N);*
 - *Sowe Valley (S).**Detailed boundaries of the Green Belt will be defined in Local Plans."*
- 1.4 Coventry City Council prepared a non-statutory local plan, the Coventry Green Belt Plan, in 1988 and this was incorporated into the City of Coventry Unitary Development Plan (UDP), approved by Government in 1993. This carried forward the extent of the Green Belt and set its detailed boundaries on the Proposals Map. The Green Wedges at Cannon Park, Coundon, Sherbourne Valley, Sowe Valley, Tile Hill Woodlands and Westwood Heath were specifically referred to in Policy GS5 'The Character and Extent of the Green Belt'. It is worth noting that the designation of some Green Wedges as Green Belt was not peculiar to Coventry. It also happened elsewhere in the West Midlands and the North-East of England.

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- 1.5 The Coventry Development Plan 2001 superseded the Coventry UDP 1993. It continued the designation of the Green Wedges referred to above as Green Belt, specifically identifying their role in helping to meet the purposes of Green Belt. Again, the detailed boundaries were shown on the Proposals Map and also on Map GE 1 which showed locations for Green Belt changes.
- 1.6 Therefore, six statutory development plans for Coventry have identified that the identified Green Wedges in Coventry are an integral component of its Green Belt. The independent Inspectors for five of these plans have recommended that this should be the case and the Government on six separate occasions has issued notices of approval for the plans. There has been no change in Government guidance regarding the purposes of Green Belt throughout that period up to the present day. There is no justification therefore for saying that the identified Green Wedges do not continue to fulfil these purposes and there is no suggestion that, apart from the specific locations identified in the draft Plan to be removed from the Green Belt, there is a need beyond the Plan period for built development on the Green Wedges which would render their continued designation inappropriate. In other words there is no suggestion that their permanence and openness is under question.
- 1.7 The proposed removal of Green Belt designation from these Green Wedge areas appears to rest upon the findings of the Joint Green Belt Study 2015. The methodology for this Study essentially was to assess the level of contribution of a series of identified parcels of Green Belt land against the five purposes of Green Belt. On the basis of these assessments a number of the Green Wedge parcels of the Green Belt were deemed to be 'low-performing', although it should be noted that most were in the 'mid-performing' category. Nevertheless, on the basis of that assessment it was recommended at Paragraphs 5.11 and 5.12 of that Study that *"the City Council consider the re-designation of these areas as Local Green Spaces."*
- 1.8 There are three problems with this approach. The first is the Study methodology itself (leaving aside questions of timescale and timing of consultation on the approach used). There has never been any suggestion in Government guidance that all, or even most, of the Green Belt purposes have to be fulfilled in order for an area to be so designated. This may be an approach adopted by some studies but it has no official credibility. Indeed, the Study acknowledges in its conclusions and next steps at paragraph 5.7 that *"...the relatively poor performance (sic) of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify the release of the land from the Green Belt"*. Secondly, there is the problem over the Study findings, even if the assessment used for each parcel was to be accepted. While some of the parcels identified are deemed to have a 'low-performance' rating most of the Green Wedge parcels meet the 'mid-performing' standard as acknowledged by the Study report. It is clear that all the Green Wedge parcels will help meet three of the Green Belt purposes by checking the unrestricted sprawl of the City, assisting in safeguarding countryside and assisting in urban regeneration. While each parcel will contribute variably to meeting these purposes it is of course the overall contribution which the linked wedge areas make to the City which is important and not the mechanistic performance of separately assessed areas. And finally, the recommendation to remove Green Belt designation and re-designate to Local Green Space in the absence of any exceptional circumstances means that

there is essentially no real justification. The NPPF states at paragraph 83 that “*once established, Green Belt boundaries should only be altered in exceptional circumstances*”. The preparation of recommendations which rely on this ‘evidence’ (referred to on page 92 of the draft Local Plan) therefore cannot be a good reason to overturn what successive Government-approved development plans have put in place.

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- 2 Re-designation of the Green Wedge areas of Green Belt to Local Green Space is inappropriate and would lessen their protection from development over the long term.**
- 2.1 The designation of Local Green Space is proposed in draft Policy GB1 and justified on pages 95-96 of the draft Local Plan. It proposes this designation for the Green Wedge areas of Green Belt on the basis that NPPF supports the concept of such designations and these areas of Green Belt have the characteristics described. It also states that "*their protection could be secured as strongly as Green Belt*". This latter justification was also stated in the local press coverage on the publication of the draft Local Plan.
- 2.2 It is clear from NPPF that widespread re-designation of Green Belt areas to Local Green Space is not envisaged. It is describing pro-active situations where limited areas of open space can be designated as Local Green Space and not retrospective actions to take land out of Green Belt. At paragraph 77 it states that such designations should not cover "*an extensive tract of land*". By any stretch of the imagination the Coventry Green Wedges are extensive tracts of land. Furthermore, in the Government planning guidance blog referring to this aspect of extent it states that it should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name. The clear implication here is that Green Belt designation of land provides a higher level of protection status from inappropriate development.
- 2.3 The clear danger is that existing Green Belt areas, for which no exceptional circumstances have been identified for removing their Green Belt status, will have a new designation applied to them which will have a lesser threshold to pass before future development could be envisaged. The potential nibbling away at the edges of such areas for future development will be more readily facilitated than were they to remain as Green Belt. Given that one of the main aims of the original Green Belt designation of Green Wedges was to ensure their future integrity as areas penetrating deep into the city from the surrounding countryside, this would strike at the heart of that integrity.
- 2.4 This danger of future damage to the integrity of the Green Wedges is very much highlighted by the wording of Policy GB1. While protection from inappropriate development is given to Green Belt areas no such protection is extended to Local Green Space, despite the policy seeking to remove Green Belt status from the Green Wedges. Therefore, this would open up such areas to potential future development and demonstrates the attitude and real intentions in the Plan towards such areas. However, even if the wording of the draft Policy was changed to offer protection from development, this would still not and could not provide the higher level of protection given by Green Belt designation.

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3 Incorrect Wording Used in Policy GB1

- 3.1 Without prejudice to the previous objections, it should be noted that in draft Policy GB1 “*Tossil Wood*” is incorrectly named and should read “*Tocil Wood*” in the list of areas of Local Green Space. Nevertheless, if such a list is to be used in any future draft of this Policy, it would be better to maintain the description of “*Cannon Park Green Wedge*” or “*Brookstray*” as used in previous Plans since this describes much better the larger area referred to than that area near Tocil Wood.

4 Unclear Policies Map Presentation

- 4.1 Without prejudice to the previous objections, the Policies Map seeks to distinguish between various categories of open space. However, the presentation makes it unclear in some instances whether the land areas in question are proposed to be designated as “New Local Green Space” or “Parks and Open Spaces”. This can lead to confusion about the differing status of each and which policies apply.

5 Inappropriate Extent of Green Belt re-designation to Land North of Upper Eastern Green

- 5.1 It is proposed that “*15ha of land currently within the Green Belt are allocated adjacent to the A45 at Eastern Green on the western boundary of the city as part of a strategic urban extension which will also provide 2,250 new dwellings and a new Major District Centre*” (text relating to Policy JE2:5).
- 5.2 The land in question forms a key element of the strategic Green Belt gap separating Coventry from the Birmingham conurbation, lying beside the A45 major trunk road and therefore highly visible to many people experiencing the separation of the two major urban areas. Development visible from the A45 would therefore have the effect of reducing the feeling of separation which currently exists. The open gap between the built-up areas at this point (from the Windmill Hotel) to the A45 Stonebridge island (which effectively marks the edge of the Birmingham built-up area) is 7.72km (4.8 miles). The distance along the A45 which the proposed allocation abuts is 1.25km (0.8 mile). Therefore, if permitted as proposed, this would reduce the open gap by approximately 16% in what has long been recognised as one of the archetypal Green Belt gaps in the UK.
- 5.3 If the need to allocate land in this vicinity for primarily housing use is deemed to be justified by exceptional circumstances, a more sensitive approach would be to allow some land to be taken out of the Green Belt where its loss would not cause this visible reduction in the gap between the two cities. The land has a ridge line so that if development was restricted to the Eastern Green side of this, although this would obviously mean a reduced area of development, the impact of the incursion into the Green Belt would be greatly reduced.