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Ms Lisa Albrighton

Examination Room

Civic Centre 4

Much Park Street

Coventry

CV1 2PY

01 September 2016

Dear Ms Albrighton

**Coventry Local Plan**

**Hearing Session 8 Green Belt**

Martyn Bramich Associates are acting on behalf of the Benfield Group concerning the relocation of the proposed Green Belt boundary around Coventry.

We have forwarded a detailed representation with our initial forms concerning the position of the Green Belt boundary and the merits of relocating the Green Belt boundary to remove our clients land from the Green Belt.

The land included in our client's representation is located on the South side of Duggins Lane CV4 9GN.

The representation that has already been submitted to the Inspector provides an assessment of the merits of the site being removed from the Green Belt based on the policies with the NPPF and policy GB1 of the emerging Local Plan.

Comments made within our client's representation concerning the site on Duggins Lane are also relevant to the general non site specific issues raised for discussion in Hearing Session 8.

We would respond to the matters raised by the Inspector as follows,

**Item 1 Green Belt**

The Council has advocated the removal of some land from the Green Belt to accommodate future development needs of the City.

Indent 3 of Policy GB1 confirms the areas that the Council consider to be acceptable to be removed from the Green Belt.

The justification to policy GB1 confirms that it is, *"highly unlikely the Council would be a position to demonstrate a continuous five year supply of housing"* without releasing some land from the Green Belt.

We agree with the general philosophy of removing land from the Green Belt within the City boundary as a means of supplying land for future development needs.

There is a significant shortfall of homes within the West Midlands and Warwickshire area. There is also a pressing need to provide homes close to the main conurbations.

The approach suggested by the Council will achieve this to a certain degree.

However, there is an opportunity to make further use of Green Belt land to provide new development without conflicting with the objectives of Green Belt policy.

Our initial representation provides detailed comments on the merits of releasing land on Duggins Lane to accommodate much needed development.

Our client's land could be developed in its own right due the clearly defined boundaries it has or as part of a larger development scheme.

Therefore, while we agree with the principle of developing suitable Green Belt land, we feel that there has been a missed opportunity to include additional land that could be developed without conflicting with the aims and objectives of Green Belt policy.

The emerging Local Plan has given an adequate assessment of Green Belt purposes.

We would agree that the Council has considered the need to promote sustainable development before suggesting the release of Green Belt land.

However, land such as the site at Cromwell Lane identified as indent f of part 3 of policy GB1 is not as well linked to local facilities and services as our clients land which is shown as remaining in the Green Belt.

There has therefore been an inconsistency in approach by the Council where land that lies directly adjacent to employment, local services and public transport links remains in the Green Belt whereas land that is more detached from local services and projects into the wider Green Belt has been selected as being suitable for development.

Our original representation includes commentary on this issue and also includes a map with a suggested Green Belt boundary marked on it.

Therefore, while we agree that there is support for the release of some Green Belt land, we are of the view that there has been a missed opportunity to remove other areas of land from the Green Belt that appear logically as potential development sites that have strong defensible boundaries.

The key issue when considering development within the Green Belt is the impact of that development on the openness of the Green Belt.

It is impossible to provide development without there being some impact. That does not mean that development should be resisted if the purposes and intentions of Green Belt policy are preserved.

The matters for discussion include the impact of development on the Meriden Gap.

The five purposes of including land within the Green Belt will not be compromised by the development close to or within the Meriden Gap.

Moreover, other sites suggested for development and sites rejected by the Council including land at Duggins Lane ensure that the impact on the openness of the Green Belt will be limited and the purposes of land in the Green Belt set out in paragraph 80 of the NPPF will not be compromised.

Green Belt designation can unnecessarily inhibit development of sites that are sustainable and to all intents and purposes part of the urban area.

Each site should be treated on its own merit. There is, in some cases, an unnecessary burden placed on the development of sites that could be brought forward for development where land acts as a logical extension to an existing settlement or will provide infill development within an existing settlement.

The land proposed for removal from the Green Belt within the Local Plan and the land subject of our client's representation is held back from development due to Green Belt status.

The issue is whether certain areas of land are worthy of the protections that Green Belt status bestows.

We would suggest that the best approach is to provide a Green Belt boundary that is permanent and defensible and allow suitable sites to be removed from the Green Belt to be developed.

This approach provides clarity and enables the land retained as Green belt to be defended.

Policy GB1 does in general set out an appropriate approach to the management of development in the Green Belt. However, the infill policy at criterion 7 deviates away from the intentions Green Belt policy. This matter is raised by the Inspector at paragraph K of the Matters and Issues paper.

Sites identified within paragraph 3 of policy GB1 do not show the size of the site. The question is raised by the Inspector as to whether the size of each site should be stated in hectares within the policy.

The local plan proposals map will show each site and its boundaries. Furthermore, the Green Belt boundary will be redrawn if the Inspector agrees with arguments put forward concerning other sites such as our client's land that is not shown on the proposals map at present.

It therefore appears unnecessary to go into details of the size of each site when information will be freely available.

The contrary view is that indicating the size of each site will assist developers when preparing applications.

We have no objections to either approach in this matter.

Paragraph 89 of the NPPF states that infill development is appropriate in the Green Belt under the following circumstances,

- *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*

Indent 7 of policy GB1 confirms that appropriate development will be consistent with the requirements of the NPPF but then goes further to confirm that limited infill amongst existing ribbon developments would be considered acceptable for starter homes and self-build properties.

We support the general ethos of this policy. It is however too restrictive.

Land such as that owned by our client infills an area of land within an existing residential area that is close to all day to day needs, employment and transport links.

The narrow definition of acceptable infill development set out in paragraph 7 of policy GB1 could prevent much needed housing or local services being provided on suitable sites within built up areas.

The Council are clear that there is a need to release land within the Green Belt if there is any prospect of achieving and maintaining a 5 year supply of housing.

The development of suitable ribbon development sites will make a small yet vital contribution to achieving this goal.

The criteria set out in paragraph 7 of policy GB1 would work better if it was amended to a more general description to allow suitable infill development.

This would enable development that relates to the particular merits and considerations of each site to be provided.

The term Very Special Circumstances is used in paragraphs 87 and 88 of the NPPF where it relates to development proposals.

The term exceptional is used in paragraph 83 where it is concerned with relocation of Green Belt boundaries. It states,

*"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."*

The current Local Plan process seeks to remove land from the Green Belt due to the unprecedented demand for development within the region.

The Local Plan process is in accordance with the process to change Green Belt boundaries set out in paragraph 83 of the NPPF.

The use of the word exceptional would be consistent with paragraph 83 of the NPPF in terms of a boundary change. The term Very Special Circumstances should be applied to development proposals for inappropriate development in the Green Belt.

### **Item 2 Reserved Land in the Green Belt**

We have put forward a detailed representation concerning our views on the relocation of the Green Belt boundary to exclude land south of Duggins Lane from the Green Belt to enable development.

The issues raised in our initial representation set out exceptional circumstances to allow the relocation of the Green Belt boundary.

The fundamental issue is the pressing need to provide sufficient development to meet Coventry's development needs over the plan period.

The delivery of housing development is a fundamental issue.

There is no guarantee that sites identified for development in the Local Plan will come forward for development within the plan period.

The proposed relocation of the Green Belt boundary suggested in our original representation will bring forward a site that our client has full control over and wants to develop in the short term.

The land has been subject of previous Local Plan representations and our client has continued to persist in promoting the land in order to bring it forward for development.

The pressure to provide development within the West Midlands and Coventry area over the plan period enables land to be brought forward now for development.

The land owned by our client is available for development now and can come forward as a development site to deliver housing and ancillary development in the short term.

The matters for discussion provide a more general topic base than the specific details set out in our initial representation.

Paragraph 85 of the NPPF uses the term "safe guarded land" not reserved land as referred by the Council in policy GB2.

Paragraph 85 of the NPPF confirms that safe guarded land should only be allowed planning permission to be developed following a Local Plan review.

The approach taken by the Council in reserving land allows the flexibility to develop land within this plan period without a formal review of the Local Plan.

The approach taken by the Council does not fall within the definition of safe guarded land and the term reserved land is acceptable.

Policy GB2 is clear on how land that is specifically identified will come forward for development.

The key consideration will be the delivery of housing throughout the plan period.

The Council will regularly monitor the amount of housing and associated development that is provided.

Reserved land should come forward when there is an under supply of development targets.

### **Item 3 Green Infrastructure and Green Space**

Our representation is concerned with the proposed relocation of the Green Belt boundary to enable development that responds to local development requirements.

Policy GE1 deals with Green Infrastructure. The policies set out to provide an infrastructure that is useable and useful for people and wildlife.

We have no issue with matters raised by the Inspector in paragraphs a)-d) of the Issues for discussion. The policy and justification for the policy provide a detailed breakdown of the issues raised and how the Council will address those issues.

The level of protection for land that is proposed to be removed from the Green Belt will remain high. Indent 4 of the policy is clear that development should maintain the quality, quantity and functionality of the green infrastructure. There will also be opportunities to enhance and create green infrastructure within development proposals.

Land that is part of the Green Infrastructure and Green Space provision will in the most part be free of development.

The uses identified within the justification for policy GE1 will invariably be undeveloped green spaces where there is a precedent against development.

The loss of Green Belt status will not therefore reduce the protection of land included in policy GS1.

Policy GE1 gives a detailed breakdown of land and features that constitute Green Infrastructure. Policy GE2 refers to Green Space but does not give a clear definition of what constitutes Green Space.

There would appear to be some cross over with features set out in policy GE1 but it would be useful for a definitive description to be provided either within the policy or the justification.

Indent 1 of policy GE2 sets out criteria concerning the loss of Green Space. The Inspector queries whether all 3 requirements need to be satisfied.

The first requirement is that an assessment showing there is no longer a demand or prospect of a demand should be produced.

We would suggest that requirements b) and c) will be nullified if requirement a) is demonstrated i.e. there would be no deficiency through its loss and there would be no need to replace the use. The policy could be reworded to reflect this.

### Summary and Conclusion

This statement responds to the general topics for discussion raised by the Inspector.

We have also submitted a statement at the start of the process that deals with the proposed Green Belt boundary at land south of Duggins Lane CV4 9GN.

We trust that information contained within our representations will assist the Inspector when considering the Green Belt boundary and delivery of development within Coventry.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Neal Kennedy', written in a cursive style.

Neal Kennedy Dip TP MRTPI

Senior Planning Consultant