

In respect of Green Belt, the submitted Coventry Local Development Plan is unlawful and unsound.

1. The Council has failed to convincingly establish the Objectively Assessed Need in the plan period. Serious deficiencies exist in the estimates prepared by GL Hearn. See the Appendix for detail. .
2. Without a reliable OAN, all arguments of need for Green Belt land, are unsafe.
3. Exceptional Circumstances have not been demonstrated, in accord with case law and policy
4. The council has fundamentally misinterpreted the NPPF. It has wrongly asserted that OAN must be met in full. .
5. Building on Green Belt in and around Coventry may not reduce commuting. It may actually increase commuting, noise, traffic and pollution. It does not constitute an “exceptional circumstance”.
6. Brexit is likely to have a dramatic effect. Given the firm commitment of the government to reduce international migration to tens of thousands, population growth in Coventry is set to fall dramatically. If international migration falls by half, there will be no net population growth. See appendix.
7. The Council changes to Green Belt do not have the support of local people, as required by ministerial guidance.
8. The Council has not properly weighed the requirement for Green Belt to be enduring and permanent nor has it properly assessed the particular hazard of urban sprawl, They have failed to consider channeling growth beyond the Green Belt boundary (NPPF84). Nor has it given appropriate weight to loss of Biodiversity, the damage to recreation, leisure, education, ecosystem services, landscape and health - as recognised by NPPF9

1. The Council asserts:

“The NPPF is clear that housing need (market and affordable) must be met in full.”

Making this bald assumption, the Council can come to only one conclusion: that land has to be released from the Green Belt– there is no logical space for any other decision, given its faulty determination of OAN, and land availability in Coventry. By precluding any consideration of other policies in the NPPF, - especially the great importance which government attaches to Green Belt (NPPF 79-84) - the Council acts unlawfully. It has not taken account of all the material facts and policies which it is required to consider and arrives at an unsound and unlawful judgment. It is neither in accord with national policy nor case law.

The courts have set out that the test for changing a Green Belt boundary, to add or subtract land, is a “very stringent one”, and that the exceptional circumstances claimed must be such as to “necessitate” removal of Green Belt land. Coventry Council has not demonstrated the necessity of removing land from Green Belt. Unmet housing need is not such a necessity in itself. Brandon Lewis wrote on 7 June 2016 to all 'MPs

“We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries”

The council has claimed that there are sustainability reasons for building on Coventry Green Belt ie. that it will reduce commuting. We refute that argument entirely below. All things considered, we think it may well increase commuting.

The council also claims a desire to change the mix of homes in Coventry. We refute the claim that this requires release of Green Belt. In the most likely scenario following Brexit, population growth will drop dramatically, and all building needs, including large homes to change the housing mix, will fit within the city boundaries on brownfield land. See Appendix, figure 2.

NPPF 14, and footnote 9, states that the presumption of sustainable development does NOT apply to Green Belt.

National Planning Policy Framework

14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, **unless**—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or—specific policies in this Framework indicate development should be restricted⁹.

footnote9

For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

NPPF 47 describes the sequence of judgments required when considering whether or not the full OAN should be met.

“NPPF 47. To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, **as far as is consistent with the policies set out in this Framework**, [emphasis added] including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

It is the phrase in bold, above, which requires a balancing exercise against the other policies in the NPPF, as below. .

79. The Government attaches great importance to Green Belts. 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.

80. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

82. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.

83. 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

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

85. When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Very helpfully, the courts have set out, in case law, the correct approach to balancing a

need to meet the full OAN, and to take account of other policies in the NPPF. The courts do not agree with Coventry Council that OAN must be met in full. In contrast to the Coventry argument, the courts have found that Green Belt can actually provide a legitimate reason for not meeting all of the OAN.

The case of Hunston v St Albans considers a situation very similar to that of Coventry: of a local authority which is tightly constrained by Green Belt and has limited remaining opportunities to build within the city boundary.

See

R (Hunston Properties Ltd) v SSCLG and St Albans City and District Council
[2013] EWHC 2678 (5 September 2013) [2013] EWCA Civ 1610 (12 December 2013):

At the court of appeal, in Hunston, Sir David Keene wrote,

“6There is no doubt, that in proceeding their local plans, local planning authorities are required to ensure that the "full objectively assessed needs" for housing are to be met, "as far as is consistent with the policies set out in this Framework". Those policies include the protection of Green Belt land. Indeed, a whole section of the Framework, Section 9, is devoted to that topic, a section which begins by saying "The Government attaches great importance to Green Belts": Paragraph 79. The Framework seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that "the general extent of Green Belts across the country is already established." It seems clear, and is not in dispute in this appeal, **that such a Local Plan could properly fall short of meeting the "full objectively assessed needs" for housing in its area because of the conflict which would otherwise arise with policies on the Green Belt** or indeed on other designations hostile to development, such as those on Areas of Outstanding Natural Beauty or National Parks. What is likely to be significant in the preparation of this Local Plan for the district of St Albans is that virtually all the undeveloped land in the district outside the built up areas forms part of the Metropolitan Green Belt. [emphasis added]

He goes on to consider the correct approach to such a situation:

21. In essence, the issue is the approach to be adopted as a matter of policy towards a proposal for housing development on a Green Belt site where the housing requirements for the relevant area have not yet been established by the adoption of a Local Plan produced in accordance with the policies in the Framework. Such development is clearly inappropriate development in the Green Belt and should only be granted planning permission if "very special circumstances" can be demonstrated. That remains government policy: paragraph 87 of the Framework. In principle, a shortage of housing land when compared to the needs of an area is capable of amounting to very special circumstances. None of these propositions is in dispute.

He went on:

28. However, that is not the end of the matter. The crucial question for an inspector in such a case is not: is there a shortfall in housing land supply? If it is: have very special circumstances been demonstrated to outweigh the Green Belt objection? As

Mr Stinchcombe recognised in the course of the hearing, such circumstances are not automatically demonstrated simply because there is a less than a five year supply of housing land. The judge in the court below acknowledged as much at paragraph 30 of his judgment. Self-evidently, one of the considerations to be reflected in the decision on "very special circumstances" is likely to be the scale of the shortfall.

- 29 But there may be other factors as well. One of those is the planning context in which that shortfall is to be seen. **The context may be that the district in question is subject on a considerable scale to policies protecting much or most of the undeveloped land from development except in exceptional or very special circumstances, whether because such land is an Area of Outstanding Natural Beauty, National Park or Green Belt. If that is the case, then it may be wholly unsurprising that there is not a five year supply of housing land when measured simply against the unvarnished figures of household projections. A decision-maker would then be entitled to conclude, if such were the planning judgment, that some degree of shortfall in housing land supply, as measured simply by household formation rates, was inevitable.** That may well affect the weight to be attached to the shortfall. [emphasis added].
- 30 I therefore reject Mr Stinchcombe's submission that it is impossible for an inspector to take into account the fact that such broader, district-wide constraints exist. The Green Belt may come into play both in that broader context and in the site specific context where it is the trigger for the requirement that very special circumstances be shown. This is not circular, nor is it double-counting, but rather a reflection of the fact that in a case like the present it is not only the appeal site which has a Green Belt designation but the great bulk of the undeveloped land in the district outside the built-up areas. **This is an approach which takes proper account of the need to read the Framework as a whole and indeed to read paragraph 47 as a whole. It would, in my judgment, be irrational to say that one took account of the constraints embodied in the policies in the Framework, such as Green Belt, when preparing the local plan, as paragraph 47(1) clearly intends,** and yet to require a decision-maker to close his or her eyes to the existence of those constraints when making a development control decision. They are clearly relevant planning considerations in both exercises.

para 32 is particularly helpful, in providing the correct sequential approach to a situation where the OAN cannot be met in full without encroaching onto Green Belt.

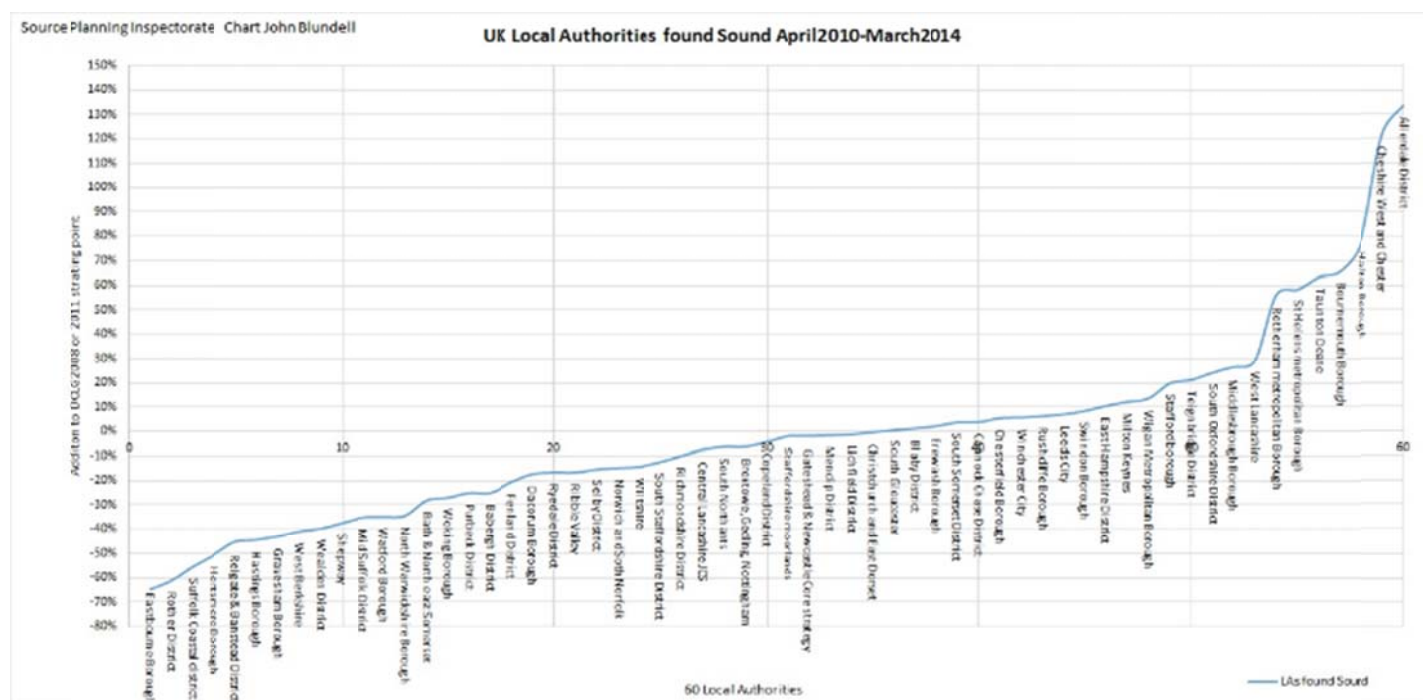
32. Where this inspector went wrong was to use a quantified figure for the five year housing requirement which departed from the approach in the Framework, especially paragraph 47. On the figures before her, she was obliged (in the absence of a local plan figure) to find that there was a shortfall in housing land supply. However, decision-makers in her position, faced with their difficult task, have to determine whether very special circumstances have been shown which outweigh the contribution of the site in question to the purposes of the Green Belt. The ultimate decision may well turn on a number of factors, as I have indicated,

including the scale of the shortfall but also the context in which that shortfall is to be seen, a context which may include the extent of important planning constraints in the district as a whole. **There may be nothing special, and certainly nothing "very special" about a shortfall in a district which has very little undeveloped land outside the Green Belt.** But ultimately that is a matter of planning judgment for the decision-maker.

In short, the decision maker has to have regard to the OAN as a starting point but is not obliged to fulfill it. Very explicitly, regarding a shortage of land, outside of the Green Belt – exactly the situation that Coventry faces “

“There may be nothing special, and certainly nothing "very special" about a shortfall in a district which has very little undeveloped land outside the Green Belt”

The point – that it is not necessary to meet the full OAN - is confirmed, by the following chart of the OAN in 60 approved sound local plans. See the figure below:



While this case deals with the requirement to meet the 5 year land supply, and a site development control decision, it does refer, in para 30, to a parallel approach to be taken to the plan making process – the need to have regard to the large amount of Green Belt in a district - and any change of Green Belt boundaries ie the proper application of para 47 NPPF.

Justice Sir David Keene further provides considerable comfort to Coventry Council. Over the public consultation meetings they have repeatedly threatened that a worse outcome would occur if they did not approve their current plan – that the government would step in and impose something worse. Sir David does not agree with that alarming threat. Here is what he says

31. There seemed to be some suggestion by Hunston in the course of argument

that a local planning authority, which did not produce a local plan as rapidly as it should, would only have itself to blame if the objectively-assessed housing need figures produced a shortfall and led to permission being granted on protected land, such as Green Belt, when that would not have happened if there had been a new-style local plan in existence. That is not a proper approach. Planning decisions are ones to be arrived at in the public interest, balancing all the relevant factors and are not to be used as some form of sanction on local councils. It is the community which may suffer from a bad decision, not just the local council or its officers

According to this comment, Green Belt would have the same protection as currently, if a new local plan was not rapidly produced.

In *Gallagher v Solihull*, the courts focused on the correct considerations for changing a Green Belt boundary, through the making of a local plan. They found that the NPPF had not changed the threshold requirements for changing a Green Belt boundary, that exceptional circumstances must exist, that the test to be met for doing so, was “very stringent”, that the boundaries should be “enduring” and not subject to changes in the local plan,

Gallagher Estates v Solihull Ltd

Gallagher Estates v Solihull Ltd

13.

Gallagher Estates challenged the inclusion of their site within the Green Belt as part of the Solihull Local Plan. See

Gallagher Estates Ltd v Solihull MBC [2014] EWHC 1283 (Admin) (30 April 2014) aka *Gallagher*

[http://www.bailii.org/cgibin/format.cgi?doc=/ew/cases/EWHC/Admin/2014/1283.html&query=\(gallagher\)+AND+\(solihull\)](http://www.bailii.org/cgibin/format.cgi?doc=/ew/cases/EWHC/Admin/2014/1283.html&query=(gallagher)+AND+(solihull))

J Hickinbottom wrote:

There is a considerable amount of case law on the meaning of "exceptional circumstances" in this context. I was particularly referred to *Carpets of Worth Limited v Wyre Forest District Council* (1991) 62 P & CR 334 ("Carpets of Worth"), *Laing Homes Limited v Avon County Council* (1993) 67 P & CR 34 ("Laing Homes"), *COPAS v Royal Borough of Windsor and Maidenhead* [2001] EWCA Civ 180; [2002] P & CR 16 ("COPAS"), and *R (Hague) v Warwick District Council* [2008] EWHC 3252 (Admin) ("Hague").

From these authorities, a number of propositions are clear and uncontroversial.

i) Planning guidance is a material consideration for planning plan-making and decision-taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies.

ii) The test for redefining a Green Belt boundary has not been changed by the NPPF (nor did Mr Dove suggest otherwise).

a) In *Hunston*, Sir David Keene said (at [6]) that the NPPF "seems to envisage some review in detail of Green Belt boundaries through the

new Local Plan process, but states that "the general extent of Green Belts across the country is already established". That appears to be a reference to paragraphs 83 and 84 of the NPPF. Paragraph 83 is quoted above (paragraph 109). Paragraph 84 provides:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...".

However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans (e.g. paragraph 2.7 of PPG2: paragraph 83 above), and has always required "exceptional circumstances" to justify a revision. **The NPPF makes no change to this.**

b) For redefinition of a Green Belt, paragraph 2.7 of PPG2 required exceptional circumstances which "**necessitated**" a revision of the existing boundary. However, this is a single composite test; because, for these purposes, circumstances are not exceptional unless they do necessitate a revision of the boundary (COPAS at [23] per Simon Brown LJ). Therefore, although the words requiring necessity for a boundary revision have been omitted from paragraph 83 of the NPPF, **the test remains the same**. Mr Dove expressly accepted that interpretation. He was right to do so.

iii) Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

iv) Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

129 Mr Lockhart-Mummery submitted that the Inspector's approach was wrong in law; and there was nothing here that could amount to exceptional circumstances properly considered.

Discussion

130 Mr Lockhart-Mummery particularly relied on COPAS, in which Simon Brown LJ, after confirming (at [20]) that, "**Certainly the test is a very stringent one**", said this (at [40]):

"I would hold that the requisite **necessity** in a PPG 2 paragraph 2.7 case like

the present – where the revision proposed is to *increase* the Green Belt – cannot be adjudged to arise unless some fundamental assumption which caused the land initially to be excluded from the Green Belt is thereafter clearly and permanently falsified by a later event. Only then could the continuing exclusion of the land from the Green Belt properly be described as 'an incongruous anomaly'".

In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change and so the inclusion of the land in the Green Belt (see Hague at [32] per Collins J.

131 COPAS is, of course, binding upon me. Mr Dove said that these cases are fact-sensitive, and the facts of that case were very different from this. That is true; but, in the passage I have just quoted from Simon Brown LJ's judgment, he was clearly and deliberately determining, as a matter of principle, what "exceptional circumstances" required, as a matter of law, in a case such as this. It is expressly a holding, with which the whole court agreed. I am consequently bound by it. In any event, it seems to have been consistently applied for over ten years; and, in my respectful view, is right.

132 In this case, following two inquiries, the 1997 UDP defined the Green Belt to exclude the Sites. Although there were uncertainties as to when and even if either site would be brought forward for housing development, the Green Belt boundary then determined and approved through the statutory machinery was not in any way provisional or uncertain. Mr Dove was wrong to describe the Green Belt boundary – as opposed to development of the sites – as "contingent". As the Inspector found in 2005, despite the change in policy that meant that it was unlikely that these sites would be brought forward unless and until there was a change in (then) regional strategic policy, there was no justification for any change to the Green Belt boundary. That reflected the fact that **Green Belt boundaries are intended to be enduring**, and not to be altered simply because the current policy means that development of those sites is unlikely or even impossible. Indeed, where the current policy is to that effect, the amenity interests identified in the sites will be protected by those very policies as part of the general planning balance exercise. **A prime character of Green Belts is their ability to endure through changes of such policies.** For the reasons set out in Carpets of Worth (at page 346 per Purchas LJ) it is important that a proposal to extend a Green Belt is subject to the same, stringent regime as a proposal to diminish it, because whichever way the boundary is altered **"there must be serious prejudice one way or the other to the parties involved"**

133. **Those are the principles.** Applying them to this case, what (if anything has occurred since the Green Belt boundary was set in 1997 that necessitates and therefore justifies a change to that boundary now, to include the Sites?

135. I am persuaded by Mr Lockhart-Mummery that the Inspector, unfortunately, did not adopt the correct approach to the proposed revision of the Green Belt boundary to include the Sites, which had previously been white, unallocated land. He performed an exercise of

simply balancing the various current policy factors, and, using his planning judgement, concluding that it was unlikely that either of these two sites would, under current policies, likely to be found suitable for development. That, in his judgment, may now be so: but that falls very far short of **the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.**

The Court of Appeal confirmed J Hickinbottom's reasoning, and confirmed the correct interpretation of NPP47

16.....The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN to be made first, and to be given effect in the Local Plan **save only to the extent that that would be inconsistent with other NPPF policies**

In another case, *Hague v Warwick District Council* Mr. Justice Collins confirmed that exceptional circumstances must "necessitate" a change of a Green Belt boundary; the change must be "necessary in all the circumstances". In view of the high degree of uncertainty of the Coventry OAN numbers, I do not think that a change of Green Belt boundary can be said to be necessary. At best it can be said to be speculative.

Here is what Mr. Justice Collins wrote in *Hague*:

[http://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2008/3252.html&query=\(Carpets\)+AND+\(of\)+AND+\(Worth\)+AND+\(Limited\)+AND+\(Wyre\)+AND+\(Forest\)+AND+\(District\)+AND+\(Council\)](http://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2008/3252.html&query=(Carpets)+AND+(of)+AND+(Worth)+AND+(Limited)+AND+(Wyre)+AND+(Forest)+AND+(District)+AND+(Council))

5. The reason behind that guidance is that Green Belt boundaries should be chosen initially on the basis that they are to be **permanent**, so far as is possible, and **that those who have to live on land within or outside such boundaries know where they stand**. It is important that the Green Belt policy is acceptable, in terms of the public, because people will know that **it is intended to be a once-and-for-all indication as to where the boundaries should lie**. That does not mean it cannot be changed, either for the purposes of inclusion of land originally excluded, or exclusion of land originally included, but **there must not only be exceptional circumstances, but those exceptional circumstances must necessitate the change in question**. That is not to say that there is a two-stage test; there clearly is not. It is a one-stage approach which can be succinctly stated in that the "change must be necessary in all the circumstances". The word "necessitate" must be given its proper weight.

In *Carpets of Worth*, Purchas LJ wrote:

Carpets of Worth, Ltd v Wyre Forest DC (1991) 62 PCR 334.

"... [O]nce a Green Belt has been established and approved as a result of all the normal statutory processes it must require exceptional circumstances rather than general planning concepts to justify an alteration. **Whichever way the boundary is altered there must be serious prejudice one way or the other to the parties involved.**"

It is this prejudice, to the Green Belt, and to the inhabitants of Keresley, Eastern Green, and Finham, which Coventry Council has failed to weigh in its proposals. Some of these interests, which are prejudiced, are recognised at NPPF9 and 14. They claim to have considered these matters through the Sustainability assessment, however, the predetermination to build on Green Belt, contained in the assumption that all OAN must be met, renders the Sustainability Assessment entirely weightless. There is no chance that it could have deterred the council from building on Green Belt. It was a show exercise only. Furthermore, in so far as the Assessment contains factors which have nothing to do with the environment, or urban sprawl, or biodiversity, it is an inappropriate tool to weigh the harm or prejudice to the Green Belt, as Paragraph LJ requires above. The SA dilutes out the weight of factors proper to a consideration of the Green Belt.

NPPF 9

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- • making it easier for jobs to be created in cities, towns and villages;
- • moving from a net loss of bio-diversity to achieving net gains for nature; 6
- • replacing poor design with better design;
- • improving the conditions in which people live, work, travel and take leisure; and
- • widening the choice of high quality homes.

There is a balance to be struck. It is not all in favour of development. Widening the choice of high quality homes, can be an interest in favour of Green Belt development but net loss of biodiversity, and the conditions in which people live, work, travel and take leisure are interests prejudiced by removal of Green Belt. There is no presumption in favour of development on Green Belt (as per footnote 9). It will all depend on the circumstances. For a genuine balance to be struck, it must be possible for the decision to go either way. In the case of Coventry, given their assumptions, there was only one way the balance could go.

NPPF Footnote 6 in particular cites the 2011 Natural Environment White Paper "The Natural Choice: Securing the Value of Nature" which accepts the Lawton Report "Making Space for Nature". Very simply the Lawton Report, sounds an emergency alarm for the dire state of nature and wildlife in the UK – it says we need more and bigger spaces for wildlife, better connected to each other.

Caroline Spelman, the Secretary of State, writes in the introduction to the white paper:

“This White Paper – the first on the natural environment for over 20 years – places the value of nature at the centre of the choices our nation must make: to enhance our environment, economic growth and personal wellbeing. By properly valuing nature today, we can safeguard the natural areas that we all cherish and from which we derive vital services. Everyone can think of places near where they live that languish, neglected and damaged...We can put right damage done in previous years. This White Paper makes important new proposals for doing just that.

1. Nature is sometimes taken for granted and undervalued. A healthy, properly functioning natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing.

2. The Government wants this to be the first generation to leave the natural environment of England in a better state than it inherit. To achieve so much means taking action across sectors rather than treating environmental concerns in isolation. It requires us all to put the value of nature at the heart of our decision-making

These remarks must be of considerable weight, when weighing the prejudice to Green Belt, at the stage of deciding whether or not to remove land from Green Belt. There is no indication that Coventry Council has given weight to Biodiversity, well being, and Ecosystem services, when deciding whether or not it should seek to release land from Green Belt.

The Lawton Report, which was accepted in the white paper, states:

Launching the report, Professor Sir John Lawton said:

“There is compelling evidence that England’s collection of wildlife sites are generally too small and too isolated, leading to declines in many of England’s characteristic species. With climate change, the situation is likely to get worse. This is bad news for wildlife but also bad news for us, because the damage to nature also means our natural environment is less able to provide the many services upon which we depend. We need more space for nature. Our 24 recommendations in this report call for action which will benefit wildlife and people. They provide a repair manual to help re-build nature.”

The report makes the following key points for establishing a strong and connected natural environment:

- That we better protect and manage our designated wildlife sites;
- That we establish new Ecological Restoration Zones;
- That we better protect our non-designated wildlife sites;

“Throughout, we stress that what is needed is a step-change in nature conservation. We need to embrace a new, restorative approach which rebuilds nature and creates a more resilient natural environment for the benefit of wildlife and ourselves. This will require strong leadership from government, but is not a job for government

alone. It will require effective and positive engagement with the landowners and land managers. And it will need improved collaboration between local authorities, local communities, statutory agencies, the voluntary and private sectors, farmers, other land-managers and individual citizens. Pg v, exec summary, Making Space for Nature.

Declines in wildlife are a global problem: the World has failed to meet its commitment to achieve a significant reduction in the rate of global biodiversity loss by 2010; Europe has not met its 2010 target to halt biodiversity loss. The report summarises the losses that have occurred, and continue to occur, in England's wildlife. Across species groups we have seen significant declines, in particular since the end of the Second World War, mainly as a result of changes in land use which has led to the loss and deterioration of many wildlife habitats. But it is not all bad news: for some habitats and species the historic patterns of losses have slowed, and in some cases they have been reversed (often through the conservation efforts of statutory bodies, the voluntary sector and landowners). Nonetheless, across many groups of species it is the more 'specialist' species that tend to be in decline while the less choosy, more adaptable 'generalists' tend to be faring better - an indication of ongoing declines in the quality and variety of England's natural environment.

Despite the important contribution designated sites have made, England's wildlife habitats have become increasingly fragmented and isolated, leading to declines in the provision of some ecosystem services, and losses to species populations.

Ecological networks have become widely recognised as an effective response to conserve wildlife in environments that have become fragmented by human activities. Provision for ecological networks is made in a number of international treaties and agreements but England has not yet met its commitments under these agreements. Taking steps to do so, however, will deliver a range of benefits for people as well as wildlife, because of the range of ecosystem services that resilient, coherent ecological networks can provide.

"Natural England Access to Evidence Information Note EIN008 Summary of evidence: Land management 2015," confirms the catastrophic loss of specialist species. Specialist Farmland Birds have declined by 70% in the last 40 years. That is an extinction scenario. It further states that there has been weakness of provision for farmland birds and that farmland birds are an indicator of wider biodiversity. They are the canary in the cage. Previous evidence to the local plan has listed the large number of BAP birds breeding in Keresley and passthrough on migration, indicating a wide range of other biodiversity.

The Warwickshire Wildlife Trust have argued that Keresley, and Eastern Green and Finham are essential elements of the remaining ecological networks in and around Coventry. Housing estates, even with large gardens, and amenity areas, are not a substitute for open countryside, with the typical arden mosaic of trees, hedges, fields, wetland, and woods.

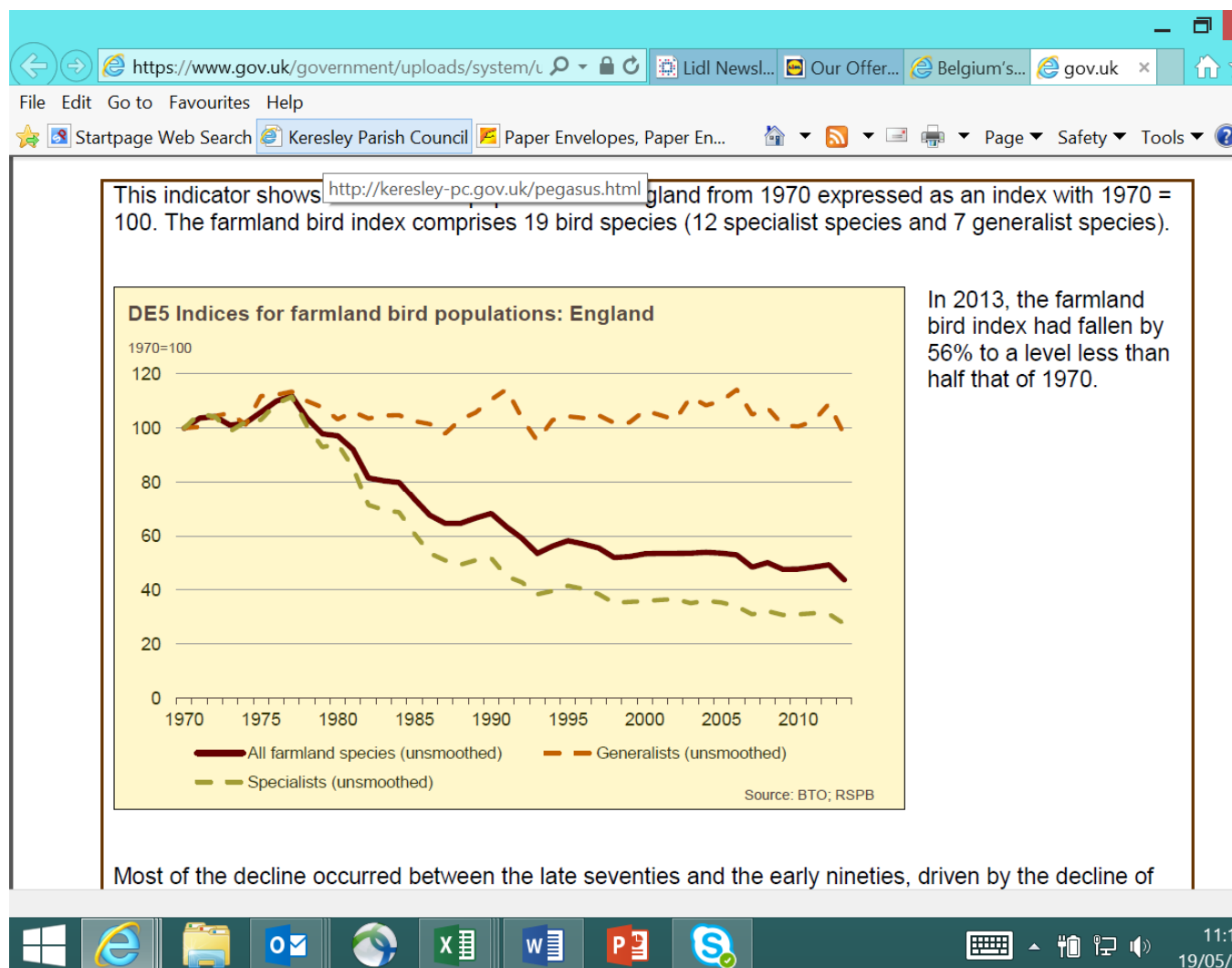
3.3 EIN008 Summary of Evidence: Land Management, Natural England.

"3.3 Specialist Farmland Birds are used as an indicator of the wider biodiversity of farmland; an index tracking the populations of 12 species showed a dramatic decline between 1970 and the late 1990s (Defra 2013a) – see the

table below: it is contained in Defra 2013a, referenced in EIN008

- 3.10 Amongst species groups, bat populations are increasing but the farmland bird index shows no sign of recovery. The majority of butterfly species have continued to decline because of habitat deterioration resulting from a combination of neglect and intensification (Fox et al 2011) . The Countryside survey (Smart et al 2010) has shown evidence of a continued decline in plant species diversity in the more botanically interesting neutral grasslands and in boundary habitats”.

The chart below, referenced in EIN008, shows what has been happening. It is of great significance to note the difference between generalist birds – like sparrows, blue tits, and blackbirds(the top dashed line) who are doing fine– They are the ones who will live in towns and gardens on the new luxury estates, while specialist farmland birds, like yellow hammer, sky larks, and lapwing, which currently live in mixed open areas of Green Belt, comprised of fields, hedgerows, wetland, and woodland, are declining disastrously. (the lower dashed line)



The proposed developments will have a disastrous effect on specialist birds and butterflies, reptiles, and amphibians, which the Council has failed to weigh in its decision making at the correct stage. In the plan, Coventry says that wildlife

have been considered through the sustainability assessment – which is only concerned with where development is to be put. The sustainability assessment at no point considered a smaller OAN, as one of its reasonable alternatives. - which is now highly likely on the evidence. NPPF 47 and 9, would have the council consider wildlife, and nature interest at the very early stage of deciding whether or not OAN is to be met in full and whether or not land is to be removed from Green Belt

Keresley is known to be an area with protected species including great crested newts, bats, and badgers. All of these are likely to be exterminated by a large housing development, with heavy predation and disturbance by cats, dogs, children, bikers, and walkers.

It has been a key public service target for Defra to halt the decline farmland birds.

See:

<http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=10085>

NPPF14 restates Purchas LJ's instruction, of the necessity to weigh the prejudice for and against development on Green Belt thus:

NPPF 14....Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, **when assessed against the policies in this Framework taken as a whole;**
- specific policies in this Framework indicate development should be restricted.

It is all of the nature interests, as set out above by the Secretary of State in the White Paper, and the Lawton Report, and EIN008, which fall to be considered as “adverse impacts”. Despite the Council's talk of country parks, and green amenity areas, there is no substitute, for the mosaic of habitats provided in the Ancient Arden Landscape for specialist species. Given the weight of ministerial guidance and evidence from Natural England, this is a factor to be given considerable weight, in assessing the adverse impacts, and the specific policies in the NPPF. - as at NPPF 9,

“pursuing sustainable development involves seeking positive improvements ,including moving from a net loss of bio-diversity to achieving net gains for nature.”

Ministerial Planning Guidance.

Ministers have provided obligatory guidance on the tests to be applied for removing land from Green Belt or adding to it.

Brandon Lewis,
Minister of State for Housing and Planning
letter to all English MP's, 7 June 2016

“The Government has put in place the strongest protections for the Green Belt. The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, **through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.**” [Emphasis added.]

It very much appears that Coventry is relying on “demand for housing alone” to seek to change Green Belt boundaries. The council has also stated that it has a strong wish to alter the mix of housing types in the city and that this is an exceptional circumstance. If the OAN is actually much smaller, as we assert, and is very likely on ONS research, and on the highly likely impact of Brexit, then this goal could be achieved by building luxury 4-5 bedroom homes within the city limits on previously developed land.

“With the support of local people”

The Minister very clearly states that Green Belt changes should happen

“onlywith the support of local people”

No such support exists in Coventry. In 2009, more than 13,000 people signed petitions against building on Green Belt, and submitted them to the council. In response to the Council's latest consultation 85% of the responses were against building on Green Belt. At packed public meetings in Eastern Green in 2016, hundreds of people, protested vociferously against the plans to build on Green Belt and no more than one or two people in each meeting spoke in favour.

In 2010, John Mutton, leader of the labour party, was elected leader of the Council on a platform of “no building on Green Belt, green field, or green anything”. It was widely considered that Green Belt and pot holes were the two crucial issues that swung the election and control of the Council from Tory to Labour. That constitutes the biggest, and most authoritative public consultation on Green Belt in Coventry.

The Coventry Labour party affirmed that position before the election in 2014, and only announced a change of position after the election, in June 2014. There is no electoral mandate for building on Green Belt.

A local election, with Green Belt as a major issue, is the largest and most reliable of public consultations. It gives effect to the Aarhus right of the public to participate in Environmental Decision Making. The local Elections of 2010,12, and 14, resoundingly delivered the verdict that Coventry people do not want building on Green Belt.

Commuting

We further dispute the suggestion that building luxury homes on Green Belt will reduce commuting into and out of Coventry, as the council argues. The council assumes that new buyers of luxury homes will work in Coventry and hence drive fewer miles than as at present.

To the contrary, it is equally likely that people who work in Stratford upon Avon, Warwick and Milton Keynes – where there is good job growth and high paid work – will see

Keresley, Eastern Green and Finham, as attractive affordable places to buy a large detached house which they could not afford where they work. According to RIGHT MOVE, the average detached house in Stratford during the last year was £494,000. Detached properties are far more expensive there, than in Coventry.

According to Right Move:

“Most of the sales in [Stratford-Upon-Avon](#) over the past year were detached properties which on average sold for £494,254. Terraced properties had an average sold price of £283,238 and flats averaged at £199,448. “

“Last year most property sales in [Coventry](#) involved terraced properties which sold for on average £144,504. Semi-detached properties sold for an average price of £187,442, while detached properties fetched £305,357. “

The completion of HS2 in 2026, will make Keresley, Finham and Eastern Green look very attractive to people working in London – House prices for a large home will be far lower than London and they will be able to drive to the HS2 interchange near Birmingham Airport, and commute to London in an hour, including both the drive and train journey.

Building on Green Belt in Coventry is by no means a sustainable solution to reduce commuting. It could just as easily, produce a perverse result and increase pollution, congestion, and noise from more commuting.

Here is the current commuter situation for Coventry,

Coventry has **78,767** internal commuters (commuting journey starts from Coventry and ends in Coventry).

118,367 commute out of Coventry to elsewhere in UK, and **129,397** commute into Coventry from [elsewhere](#) in UK, leaving a Net **11,030** commuters into Coventry. **Table1 below.**

That is **11,030** workforce that do not need homes in Coventry but commute in. Is there any need to build houses for growth, when there is already an existing surplus workforce feeding that need via **11,030** net .in-commuters, along with **11,087** unemployed in Coventry (March2015) (Model based unemployment at LA level greater accuracy 7.2% unemployment rate)

Source: Appendix04 Commuters WU01UK West Midlands
nomis_2015_08_04_233504.xls

Commuter Residence	Coventry	UK
Coventry as residence to elsewhere Out	78767	118367
Elsewhere to Coventry as Place of work	78767	129397
Net In commuters to Coventry +	0	11030
Negative = Net Out commuters		

Source: Appendix04 ONS WU01UK Census2011 revise Nov2014 Commuter Data

<u>Residence</u>	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford on-Avon	Warwick	Totals
<u>Coventry as residence to elsewhere Out</u>	1134	4878	3805	1976	9249	21042
<u>Elsewhere to Coventry as Place of work In Commuters</u>	1614	11392	4909	1854	7903	27672
<u>Net In commuters to Coventry +</u>	480	6514	1104	-122	-1346	6630
<u>Negative = Net Out</u>						

Commentary: There is already net out commuting from Coventry to the economic growth areas of Warwick and Stratford. People are using Coventry as a cheap base to commute to areas where there are better jobs.

Nuneaton (and to a much less degree Rugby) is the major source of net in commuting into Coventry – the major source of undesirable commuting miles. Given it's proximity to Coventry, it seems highly unlikely that many people would move from Nuneaton to Coventry to reduce a short commute – people don't move house lightly, given their attachments, and their children's attachment to local schools, churches, clubs, surgeries, and social and family networks.

From the figures above, it is more likely that someone who lives in Coventry will work somewhere else - there are 74,000 internal commuters, and 118,000 commuters going somewhere else. On balance, given current patterns of commuting, if you build a new home in Coventry, it is much more probable that the new inhabitants will work somewhere else than in Coventry. (the probability of working elsewhere is 61% = 118000/192000 while the probability of working in Coventry is 39%).

Looking at sustainable options for Coventry, it would be far less damaging to the environment, and require far less social engineering ie moving people from their existing home areas to Coventry, if the council were to promote car pooling. It is far more possible, and likely, than it was in the past. The social infrastructure exists to make it happen. Google have launched a car pooling service, Waze RideWith, which they have tested in Silicon Valley and are now expanding in San Francisco, which enables people to match up for car pooling and to share costs. Uber too is heavily promoting carpooling in Manhattan and Lyft are expanding carpooling too. Car pooling is a realistic and viable alternative.

Building 10,000 homes on Green Belt, around Coventry, could potentially remove a maximum of 10-20000 daily inter city/intertown commutes (assuming, on the very best case scenario, that 2 people in each household commute from somewhere else currently and both take up work in Coventry after moving here). In contrast,

a successful carpooling strategy, could save hundreds of thousands of daily commute journeys. There are 118367 outward journeys from Coventry daily, and 129397 inward journeys. If you get all commuters to share with one other person, you would save 123882 commute journeys per day which is a far greater potential saving than the one achieved by building homes on Green Belt and wishing hopefully that those people will work in Coventry.

Calculation: Total commute journeys = 118367 outward + 129397 inward = 247764 .

if 2 people share their journeys for each of trips, the total journeys is halved = 123882

The Coventry Council sustainability argument, for reducing commuting by building luxury homes in Keresley Eastern Green and Finham, is highly dubious, when one carefully examines the detail of commuting and considers the sustainable alternatives, which have a far bigger payoff in reducing congestion, noise, and pollution and have a far less detrimental impact on Green Belt, biodiversity, and landscape.

The Green Belt Studies

Coventry Council states in the submission plan, .

“The NPPF requires changes to the Green Belt to be made through the Local Plan process. A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes.”

This garbles and misrepresents NPPF84, which states,

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. **They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.**

The second sentence, in bold above, makes it clear that the intention is to direct development away from Green Belt, - towards areas inside the Green Belt, or outside of it. It is not at all about cherry picking sustainable locations within the Green Belt.

There is no basis in case law or planning guidance or legislation for the approach taken in the Green Belt studies. It implies that “development requirements” can necessitate removal from Green Belt. The courts have been very clear. The test for removing land from the Green Belt is that there must be exceptional circumstances which necessitate removal from Green Belt. Whether or not a location is sustainable, is not an exceptional circumstance, nor does it necessitate removal from Green Belt.

In practice, the Council, and its Green Belt studies, seeks to fudge the essential nature of Green Belt, by doing pseudo scientific evaluations and trying to identify which parcels of land meet more of the 5 purposes of Green Belt. There is nothing in case law, statute, or guidance to support counting tick boxes like this, to decide, in effect which pieces of land should be removed from Green Belt. It is a numerical fallacy to assume that all decisions can be reduced to quantitative assessment.

For example, I do not love my daughter more, because she does ballet and rides a bike, - getting 2 ticks - while my son only rides a bike and gets 1 tick. The love is indivisible and not subject to tick box assessment. Other categories are similarly indivisible –. Both I and a quadraplegic are alive and have an equal right to life even though I can get more ticks for running and swimming and washing dishes. If we both turn up at A&E, we get equal treatment.

Scoring parcels of Green Belt land, for the number of purposes they serve, is a logical fallacy which attempts to base Green Belt changes on pseudo science – that somehow one can score parcels of land and decide which ones most deserve to be in the Green Belt. That is not a permissible approach according to Gallagher. The test is and must be, that exceptional circumstances exist which necessitate removal from the Green Belt. There is nothing in policy statute or case law that supports the assertion that a parcel of land meeting 5 of the Green Belt objectives is more deserving of staying in the Green Belt than a parcel which meets one of the purposes.

The Council writes:

Development in these locations would effectively be ‘infill’ and/or controlled growth and would be well contained by existing significant features and the landscape. It would not be urban sprawl. In defining precise areas for removal, however, the Council has sought to minimise any harm to the remainder of the Green Belt by indicating the type of development (in terms of use class and density) that would be acceptable in these locations.

This is wishful thinking. Building low density 4-5 bed homes into the countryside, is the very paradigm of how urban sprawl proceeds.

The Council also claims that wildlife, recreation, ecology, and biodiversity values have been incorporated into the judgments via the sustainability assessments. Once again, I point out that the sustainability assessment is not an environmental assessment. At least 50% of the factors it considers, have nothing to do with environment. A good site for ecology, can easily score less than another site which received points for things like .

Improve accessibility to and use of basic services and amenities to all residents.

Enable vibrant and inclusive communities that participate in decision-making.

Reduce social exclusion and poverty.

Improve health, reduce health inequalities and promote active living.

(all included in the Sustainability Assessment)

Market Signals

Planning guidance allows the consideration of Market Signals, in assessing OAN

“Where there is no robust recent assessment of full housing needs, the household projections published by the Department for Communities and Local Government should be used as the starting point, but the weight given to these should take account of the fact that they have not been tested (which could evidence a different housing requirement to the projection, for example because past events that affect the projection are unlikely to occur again or because of market signals) or moderated against relevant constraints (for example environmental or infrastructure).”

[PPG Paragraph: 030 Reference ID: 3-030-20140306](#)

Figure 6, in the appendix, shows that Coventry is one of the most affordable places in the Country to buy a house. The market signals do not support a huge expansion of house building in Coventry over present rates, which have been less than 1000 per year. Market Signals are evidence that there is no necessity to build on Green Belt in Coventry.

In Conclusion:

Coventry Council does not have a reliable OAN.

The Council has not correctly read the NPPF which does not say that OAN always must be met in full. It has not understood the the very important qualifications and caveats to that instruction:

The Council has not demonstrated exceptional circumstances which “necessitate” change of a Green Belt boundary

- Unmet housing need alone is not, an exceptional circumstance on its own
- The council has failed to provide convincing arguments of exceptional circumstances. The sustainability argument, about commuting is tendentious and unreliable.

As such the proposal to remove land from the Coventry Green Belt, and land from neighbouring authorities Green Belts, is unsound and unlawful.

Appendix – the problems with the OAN

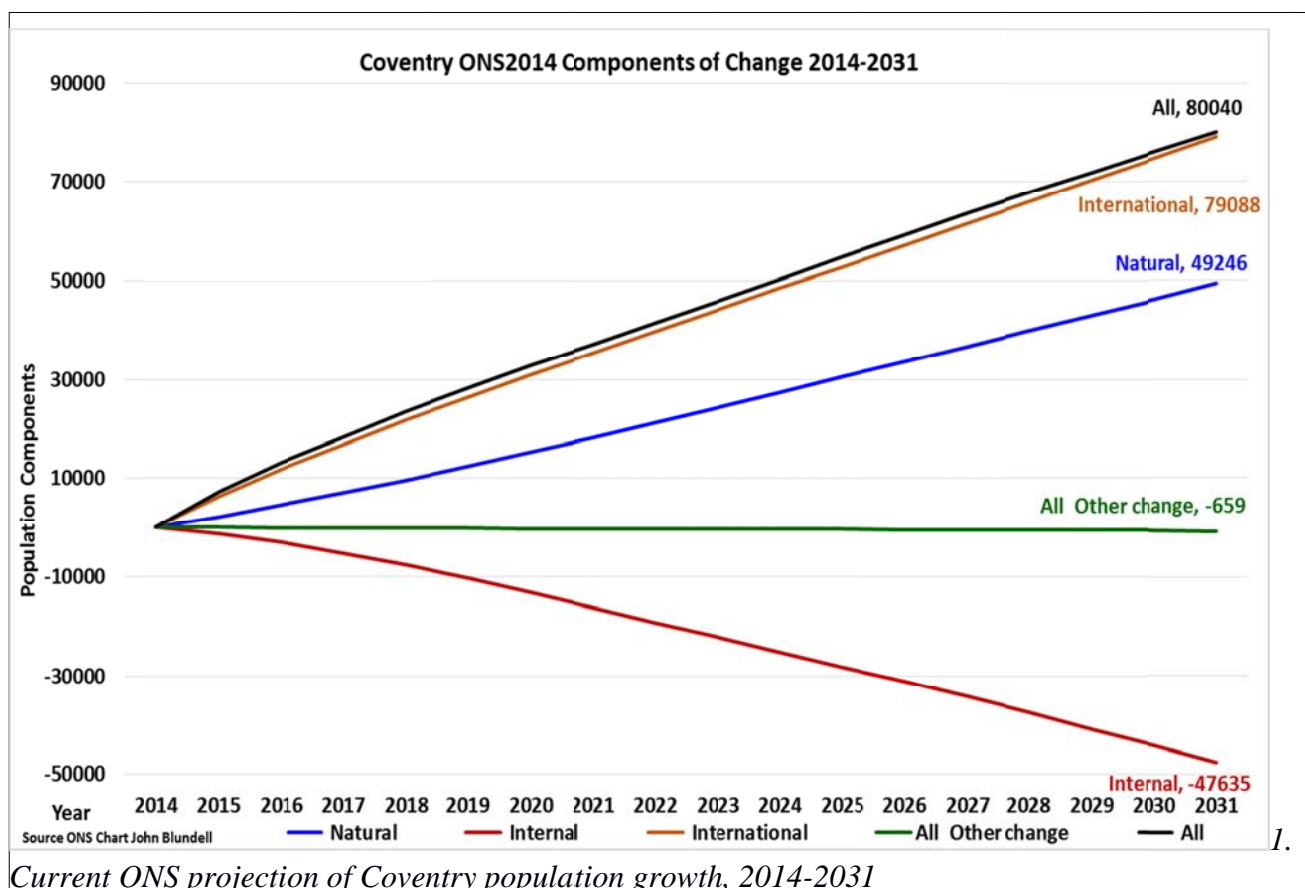
There are 2 main strands to this paper

- 1) Section 1. If Brexit means Brexit, and immigration reduces significantly, there will be no need to build on Green Belt in or around Coventry
- 2) Section 2. Even without an adjustment for Brexit, the population growth figures for Coventry are greatly inflated. There is a problem with over counting students, excessive birth and death figures, falling school admissions, and reducing NI registrations - all verified by ONS research or other official data.

Section 1. About the effect of Brexit

- Without international migration, the population of Coventry would not grow at all.
- If migration drops to just half the present level, there would be no need for building on Green Belt around Coventry
- There is no need to go to Green Belt building now - at current record rates of housebuilding, (1000/year) Coventry would not run out of brownfield land for 17 years.

Illustration 1 shows population trends in Coventry, over the period 2014-2031, with international migration continuing at the present high levels - on the latest ONS figures (ONS2014).



Current ONS projection of Coventry population growth, 2014-2031

Understanding this graph – ONS collects local information and models changes due to

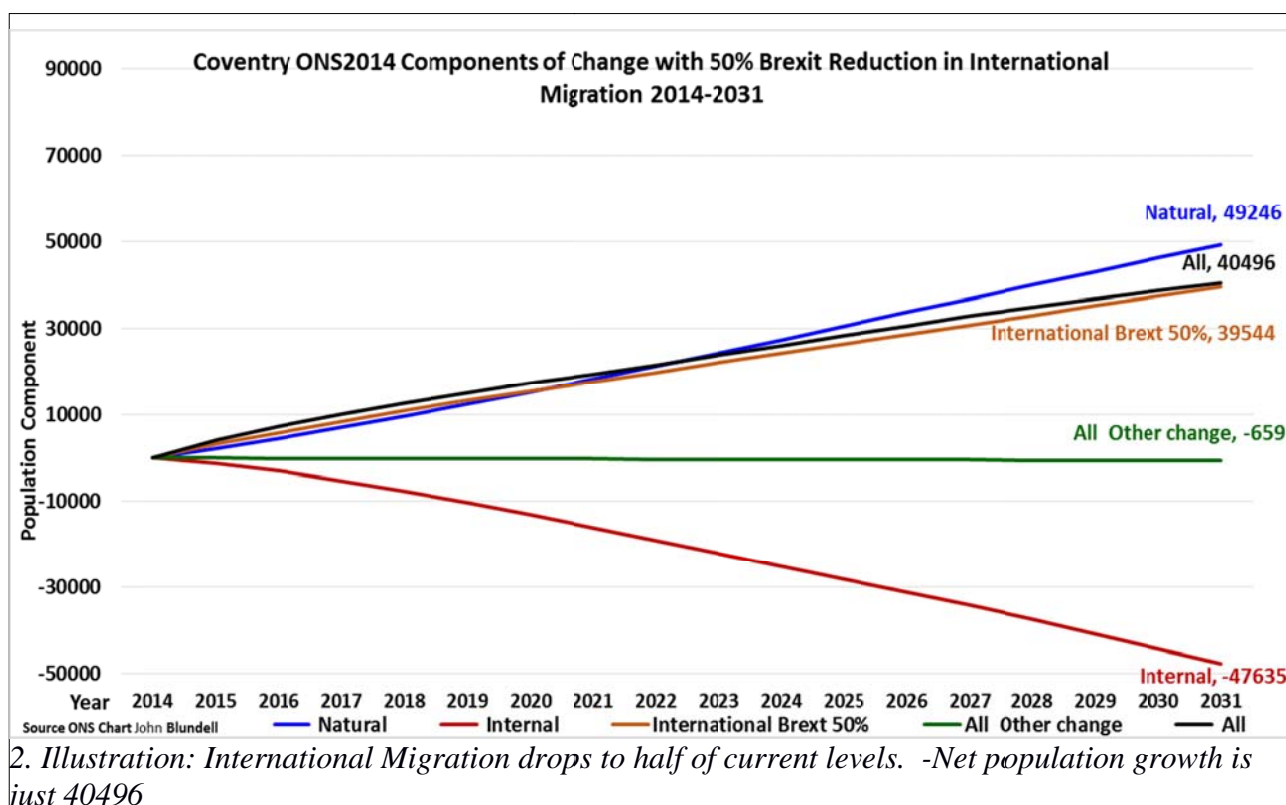
- natural change (births and deaths),
- internal migration – the movement of people into or out of Coventry from other parts of England;
- all other change (migration from Wales, Scotland, and NI, and any estimation errors)
- international migration into or out of the city from outside the UK. .

Adding them together gives Net population growth. Note that (people Moving out of Coventry (negative internal migration) more or less exactly cancels out increases from Natural change (births and deaths). Only international migration is growing the population of the city. Without it, there is no growth.

Scenario 1 – international migration drops to half of current levels

If international migration reduced to half of current levels, there would be no need to build on Green Belt around Coventry – either in Coventry or in the neighbouring authorities.

The projected population increase would be 40,496, leading to a need for 17,606 homes (assuming 2.30 persons per dwelling) - more or less the exact number of homes Coventry say they can put onto previously developed land. See Illustration 2 which shows how this would happen – again the figures are from the latest ONS figures (ONS2014). Net growth is shown by the Black line labelled “All”



Section 2: Why the GL Hearn and Shma numbers are too large anyway, even without Brexit.

- *over counting of students,*
- *excess birth and death rates,*
- *NI registrations reducing.*
- *Falling school registrations.*

1) ONS themselves concede that they have a problem correctly projecting the population in Coventry. In their own research paper, they compare their estimates, with the actual figures for the census between 2001 and 2011. They find that they overestimated the population by 12,500–

- There are 50,000 students at the 2 universities
- ONS methodology routinely counts them into Coventry, but does not count them out when they leave.
 - The methodology largely relies on GP registrations. Students often fail to de-register when they go.
 - For ONS, they remain resident in Coventry when they have actually gone.
- between the 2001 and 2011 Censuses, ONS (using MYEs) overestimated the population of Coventry by 12,500 people. Over the plan period of 20 years, this would create a ghost population of 25,000 people. At a household rate of 2.36, this results in a phantom demand for 10,169 homes that would not be needed.

See ONS paper, especially figures 4.3.1.

“Examining the difference between the rolled-forward mid-2011 ...

<http://www.ons.gov.uk/ons/guide-method/method-quality/specific/population-and-migration/population-statistics-research-unit--psru-/examining-the-difference-between-the-rolled-forward-mid-2011-population-estimates-and-2011-census-based-myes.pdf>

- This analysis – of over counting of students - is confirmed by examining the detailed age distribution of Coventry residents. There is a sharp bulge in the age range 18-23, the student years, which entirely dissipates by age 30. If students were staying in Coventry, the bulge would persist over time to later ages.

See [LA single year of age \(SYOA\) population comparison charts](#) (12.92 Mb Excel sheet)

- <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/internalmigrationlaandregionmovesandbysexandsingleyearofagetotals>

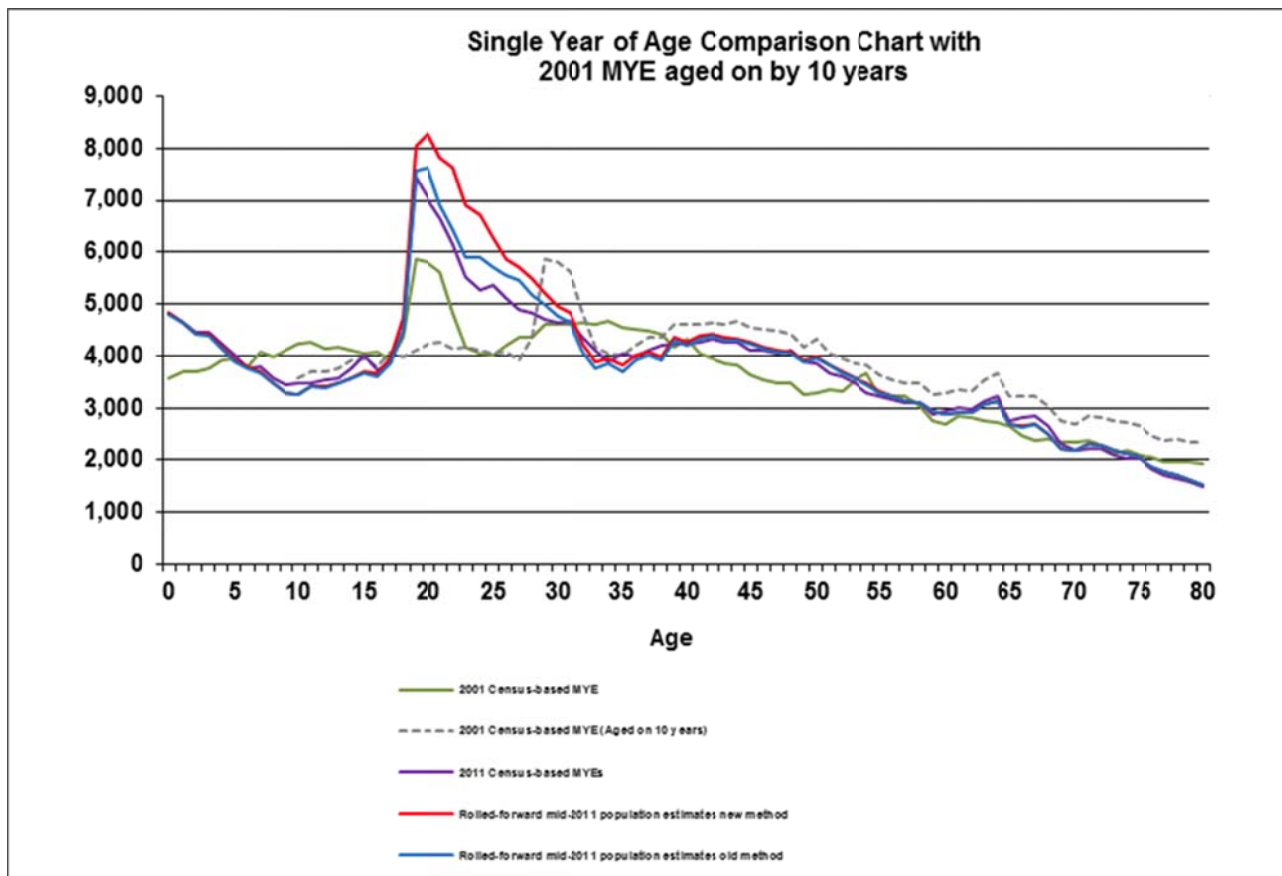


Figure 3. – Coventry population by single year of age, in 2001, and 2011. Does the student bulge remain after 10 years?

Understanding this Figure 3.

- 1) The chart shows, the actual population of Coventry, at 2001, and 2011 (the Census based accurate figure) broken down into single years of age. It shows the number of 1 year olds, 2 year olds, 27 year olds etc.
- 2) In each of the census years, there is a spike at ages 19-23, – the years of university study.
- 3) If those students stayed in Coventry, ten years later, at the next census, there would be a spike of 29-33 year olds. (this prediction is shown on the chart by dashed lines).
- 4) No such spike appears. The students have left.

Excess Births and low death rates

A. Without justification, The GL Hearn OAN spreadsheet applies inflated birth rates and depressed death rates.

- i. GLHearn pump up the birth rate from 4513 (actual) in 2013/14 to 5379 (predicted) in 14/15 – Why?
- ii. ONS on the other hand, have the Coventry birth rate predicted to be only 4800 in 2031. See: <http://maps.warwickshire.gov.uk/IAS/dataviews/tabular?viewId=304&geoid=10&subsetId=>
- iii. in their latest published figures for 2013, ONS give the birth rate for Coventry as 4495. See: www.ons.gov.uk/ons/rel/vsob1/births-by-area-of-usual-residence-of-mother--england-and-wales/2013/rtd-births-by-area-2013.xls
- iv. The GLH figures, without justification, inflate the population growth due to natural increase by $(5379 - 4513) = 866$ unaccounted for extra births per year.
- v. Projecting this unjustified excess over 16 years (2015 to 2031) gives a

spurious increase of 13856 in the population. This creates a further phantom demand for 5871 homes. (calculated at 2.36 persons/home)

B. Hearns depress the mortality rates,

- i. ONS report an overall death rate for Coventry in 2014 of 2673.
 - a) see <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-385235>
- ii. Hearn report the 14/15 death rate as only 2514. The disparity further inflates natural increase by 159 persons per year. Over 16 years (2016-31), this increases the population by approximately $16 \times 159 = 2560$. at 2.36 persons per home, this generates a phantom demand for 1085 homes.

See the graph below (figure 4) to see the way that GL Hearn have bent actual birth and death rates, without justification

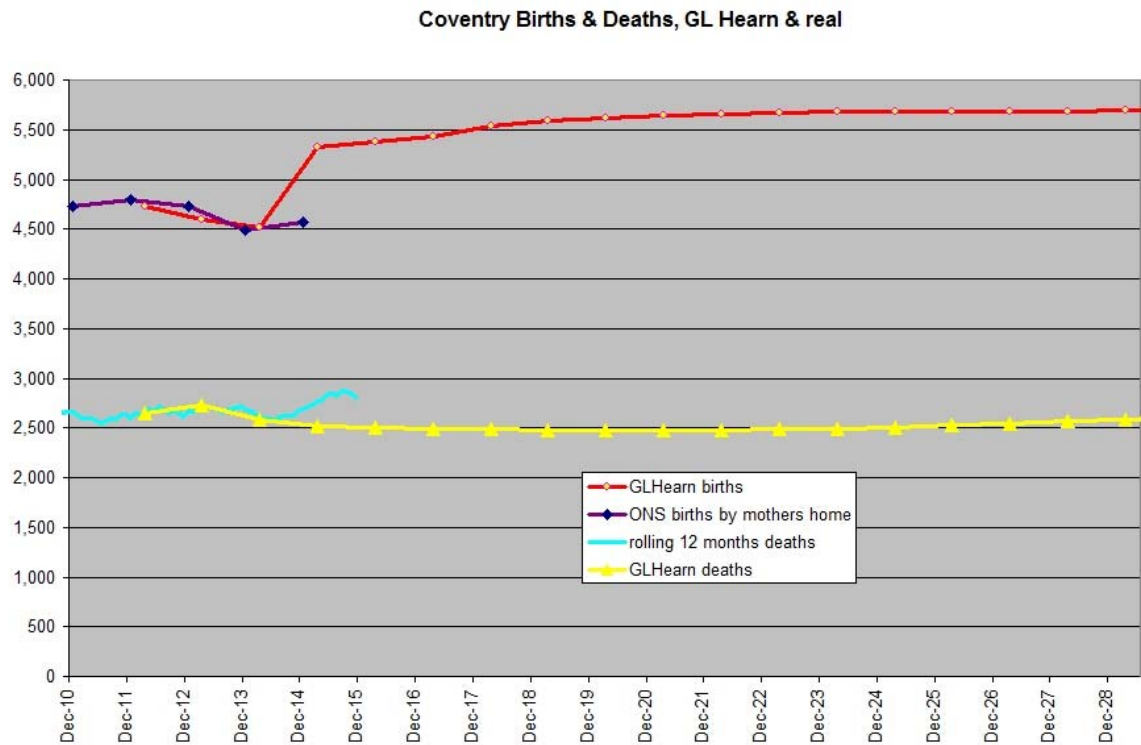


Figure 4.

School registrations:

- A. School Registrations are dropping below ONS prediction.. In the real world, projected population growth is not happening. School children are not turning up in the reception class.

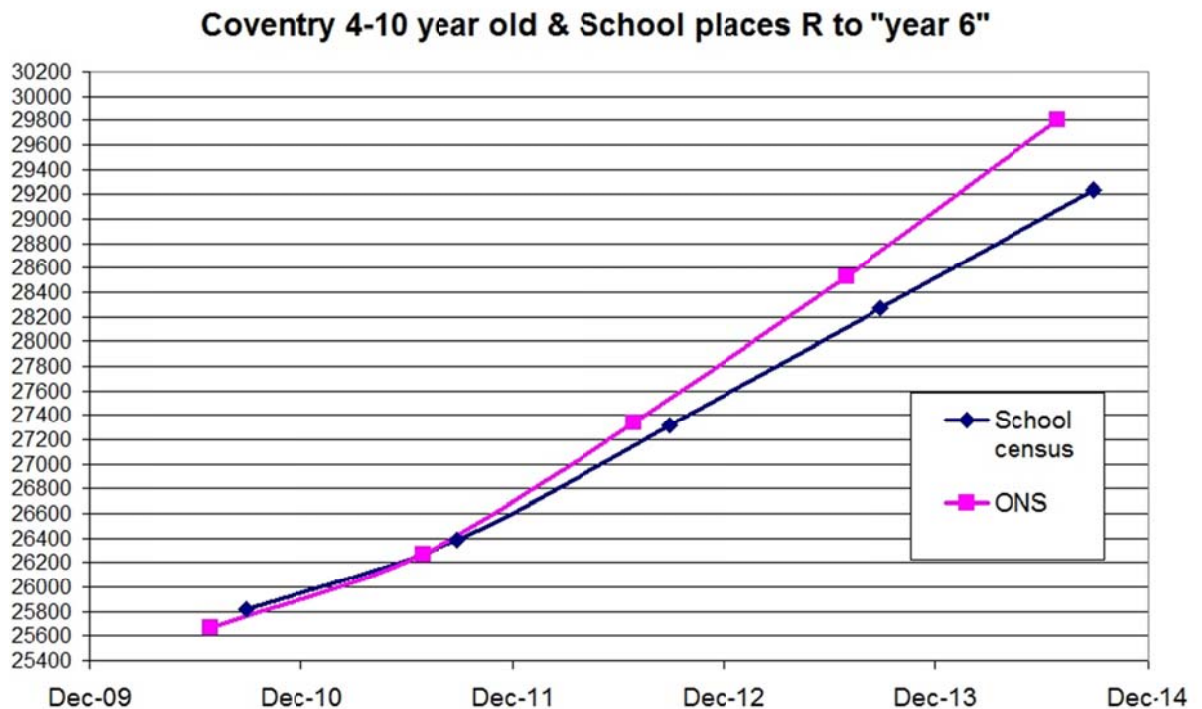


figure 5.

NI Registrations – international migration is already dropping

The Coventry Evening Telegraph reports, “Foreign workers turn back on Coventry in run up to Brexit vote”

<http://www.coventrytelegraph.net/news/coventry-news/foreign-workers-turn-back-coventry-11819492>

Fewer foreigners came to Coventry looking for work than almost anywhere else in the West Midlands [in the run up to the Brexit vote.](#)

New figures from the Department for Work and Pensions revealed the number of people coming from overseas and registering for National Insurance numbers in the West Midlands plummeted by almost a fifth between April and June this year

In Coventry that figure was down by 28.2 per cent to 1,983 people compared to the previous quarter.

Only North Warwickshire saw a larger decline proportionately with a 29.8 per cent fall to 40.

House prices

House prices in Coventry remain low. There is no indication of excess pressure on the housing market. It is one of the best places in the country to buy a house, for affordability.

Further, the GL Hearn Shma reports that real house prices in Coventry, relative to inflation, have been falling.

There is a housing crisis in London, but not in Coventry. See figure 6 below.

Figure 6 (see next page)

Table 576 Ratio of lower quartile house price to lower quartile earnings by district, from 1997

