

## **7. Green Belt and Green Environment**

### **Relevant Evidence Base**

- Coventry Green Belt Review (2007)
- Coventry and Warwickshire Sub-Regional Green Belt Study (2009)
- Coventry Green Space Strategy (2010)
- Coventry and Warwickshire Sub Regional Green Infrastructure Study (2011)
- Coventry and Warwickshire Joint Green Belt Review (2015)
- Coventry Green Belt Ecology and Biodiversity Study (2015)
- Agricultural Land Classification (2009)
- Coventry Play Pitch Strategy (2014)

### **Introduction**

The chapter establishes a new approach to how Coventry's green environment will be planned, maintained, protected and enhanced. It will present opportunities to create more sustainable developments and patterns of growth that will help meet Coventry's development needs, whilst seeking to protect the city's highest value and most sensitive green spaces. The chapter will also cover all aspects of the city's green environment including the Green Belt, green spaces, environmental designations and protected trees.

### **Green Belt**

The most important attribute of Green Belts is its openness and purpose of restricting urban sprawl. There are 5 main purposes of Green Belt and these are identified in the NPPF.

The use of land in Coventry's Green Belt also has a positive role to play in fulfilling the following objectives, through active countryside management:

- Retaining land in agriculture, forestry, and related open uses;
- Providing access to the open countryside and green corridors for the urban population, linked to the surrounding countryside of Warwickshire and Solihull;
- Providing opportunities for outdoor sport and recreation near urban areas;
- Protecting and enhancing attractive landscapes, including the Ancient Arden landscape, green corridors, and landscapes near to where people live;
- Securing biodiversity and nature conservation interests; and
- Improving damaged and despoiled land.

The city has two distinctive types of Green Belt – the open countryside of Ancient Arden on its western boundary, predominantly used for agriculture and quiet, passive leisure; and Green Belt corridors, which are extensive and continuous tracts of open land that extend through the built-up area of the city, to and from the countryside beyond.

Of greatest prominence is the wider Green Belt that encircles the city, helping prevent urban sprawl and ensuring Coventry does not merge with surrounding towns, villages and cities. This has been a key aspect of the Joint Evidence Base and the DtC. Given the

growth pressures facing Coventry and its wider HMA however, there has been a strong need to explore the most sustainable and appropriate opportunities to expand the city. Through the consideration of evidence and joint working on the DtC a number of development options have been identified within the city's Green Belt. Where development is brought forward on Green Belt land however, the Council will seek to ensure high quality design and the creation of high-quality environments within which local people will choose to live. A prime example of this is the Council's Ancient Arden Design Guidelines which will be applied in order to protect the visual amenities, local distinctiveness and character of the Green Belt, whilst also supporting sustainable development. These guidelines will form the basis of the Council's Sustainable Urban Extension Design Guidance SPD.

The Green Belt corridors have particular value in environmental quality within the urban areas, assisting nature conservation and providing people with access to the open countryside around the city by walking and cycling but have been shown, through evidence, to not fulfil the purposes of Green Belt.

Historically, the development of Coventry has occasionally led to industrial and commercial buildings being constructed within areas now designated as Green Belt. Although it may be preferable, it is sometimes unviable for such sites to be redeveloped for more appropriate Green Belt uses. Rather than seeing them become neglected, and to protect the employment land portfolio, the opportunity will be taken to improve their impact on the Green Belt.

To that end, an assessment of the Green Belt has concluded that the sites listed in Policy GB1 present significant opportunities for development. The Green Belt boundaries are therefore amended to enable sensitive, appropriate development of these sites to support the city's housing and employment needs. These are also identified on the policy map.

### **Coventry's Exceptional Circumstances**

The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting this boundary. Based on the latest evidence (from the ONS), Coventry is recognised as having the fastest growing population outside Greater London. The SHMA (2015) highlights Coventry's objectively assessed housing need to be at least 42,400 homes to 2031. Having undertaken a comprehensive review of the Green Belt together with a full analysis of other relevant evidence, it has become abundantly clear the Council cannot physically accommodate all of this need within its administrative area let alone its existing urban area.

Indeed, the constructive and on-going discussions through the Duty to Co-operate (DtC) process has enabled the Council to understand that all development needs of the Housing Market Area cannot be accommodated in the existing urban areas of Coventry and Warwickshire. All Local Planning Authorities in Coventry and Warwickshire have therefore committed to considering their Green Belt boundaries through their respective Local Plans.

The NPPF is clear that housing need (market and affordable) must be met in full. Through the findings of the Sustainability Appraisal and in taking these findings on board, the Council has considered realistic alternative options through the Local Plan and the DtC. The city also has clear issues in terms of a skewed existing housing stock and there is a need to diversify this in a viable, realistic and deliverable way. However, larger family housing is typically lower density than apartments and the existing housing developments seen within Coventry's existing urban areas and so in order to meet the housing needs of local people and ensure a deliverable and achievable Local Plan, it is acknowledged that an element of Green Belt land is required to meet these development needs. Although some of these larger, higher value homes can and will be delivered within the existing urban area and on non-Green Belt land, existing Green Belt land is required to make real inroads into the diversification of the city's housing offer and meet the city's housing needs.

The city's tight boundary also means land is depleting from an employment land supply perspective. In-commuting to Coventry for work has increased substantially in the last decade, placing pressure on sustainable travel patterns and air quality. The city must do something to reduce in commuting and rebalance its housing/employment offer. It must provide employment land to stimulate economic growth, however the balance of need and supply means this must also utilise Green Belt land.

Moreover, without the release of land for development that is currently in the Coventry Green Belt, it is highly unlikely the Council would be in a position to demonstrate a continuous five-year supply of housing land or a continuous reservoir of employment land over the medium and long-term time horizon of the plan period. Indeed, the need for housing in general and affordable housing in particular, are matters to be given very substantial weight. Paragraph 89 of the NPPF confirms that affordable housing is an issue of sufficient weight for it potentially to be an exception to normal Green Belt policy.

**Policy GB1: Green Belt and Local Green Space**

- a. The city's most up-to-date Green Belt and Local Green Space boundaries are identified on the Policies Map.

2A: Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.

2B: Within areas designated as Local Green Space, the erection of small buildings and structures which are ancillary to the primary use of the land

may be acceptable. Other developments will not be permitted unless very special circumstances are demonstrated.

3. The following areas will be removed from the Green Belt to accommodate future development needs and are shown on the Policies Map. Where appropriate further details are provided in Policy JE2, H2 and HE3;

- a. Land part of the Wood End redevelopment (residential)
- b. Land at Sutton Stop (residential and employment)
- c. Land south at Walsgrave Hill Farm (residential)
- d. Land at Keresley (residential)
- e. Land north of Upper Eastern Green (residential and employment)
- f. Land at Cromwell Lane (residential)
- g. Land at Mitchell Avenue (residential)
- h. Land off Allard Way/London Road (residential)
- i. Land at Cheltenham Croft (residential)
- j. Land east of Browns Lane (residential)
- k. Land west of Browns Lane/Burton Close (residential)
- l. Land at Cryfield Heights (residential)
- m. Land at Woodfield School, Stoneleigh Road (Residential and infrastructure)
- n. Land south of Blue Coats School (Heritage and Education)
- o. Land at Baginton Fields and South East of Whitley Business Park (employment)
- p. Land to the east of the existing Energy from Waste plant at Bar Road (general industrial)

4. The following areas will be removed from the Green Belt and re-designated as Local Green Space and are shown on the Policies Map:

- b. Sowe Valley
- c. Sherbourne Valley
- d. War Memorial Park
- e. Tocil Wood Brook Stray
- f. Park Wood and Ten Shilling Wood
- g. Tile Hill Wood
- h. Allesley Park

5. The following areas will be removed from the Green Belt and will not be re-designated as Local Green Space as they do not serve the purposes of either:

- a. Land at Park Hill Lane
- b. Land at Westwood School and Xcel Leisure Centre

6. The following areas will be designated as new areas of Local Green Space and are shown on the Policies Map:

- a. Sowe Valley Northern Extension
- b. Sherbourne Valley and Lake View Park
- c. Walsgrave Triangle, Cross Point.

7. In addition to appropriate development in the Green Belt, identified in the NPPF, limited infill development would be considered appropriate. Any proposal in these locations will be expected to be of an appropriate density to reflect the surrounding properties, should not impact negatively on the openness and character of the wider Coventry Green Belt and will also need to accord with Policy H3.

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.

In other words, the relatively poor performance of the land against Green Belt purposes is not, in itself, an exceptional circumstance that would justify release of the land from the Green Belt. The 2015 Coventry and Warwickshire Joint Green Belt Review recommended that the lowest performing parcels of Green Belt, or parts of them, could be considered for removal from the Green Belt. But the Green Belt review itself has not been considered in isolation. The Council have also considered the ecology and biodiversity value of sites, the agricultural land classification, infrastructure constraints and opportunities, and Historic Landscape Character. This information has also been brought together through Sustainability Appraisal to consider the most appropriate locations for sustainable development.

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.

Furthermore, it is important to highlight that section 2 and 7 of policy GB1 sit in part at least alongside section 9 of the NPPF by considering appropriate and inappropriate development within the Green Belt. In this context it is important to draw links to the supporting text of Policy H2 in this Local Plan in so far as it relates to the appropriate delivery of local transport infrastructure within a Green Belt location.

### **Designation of Local Green Space**

Much of the Green Belt within and close to the edge of the sub-region's urban areas plays an important role as 'green infrastructure'. This is particularly relevant in the pockets and

corridors of Green Belt within Coventry (such as the Sowe and Sherbourne river valleys), which not only make the city a better place to live, but also increase the sustainability credentials of the city, promoting health and wellbeing, biodiversity and resilience to climate change. Despite their positive uses, these pockets and corridors of Green Belt have little connection with the wider countryside around Coventry and, partly as a result, make a more limited contribution to the Green Belt purposes.

This Policy re-designates these areas as 'Local Green Spaces'. The NPPF supports such an approach, although not specifically in relation to Green Belt land. A Local Green Space designation is appropriate 'where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its *beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife*' (NPPF para. 77). This describes these parcels very well and, through any appropriate Local Plan policy framework, their protection could be secured as strongly as Green Belt.

In addition to the re-designation of these parcels and corridors, the Council's evidence base coupled with the feedback from previous public consultations, has been used to propose additional areas of local green space. These include land at Eastern Green, land north of the Sowe Valley and land at Walsgrave Triangle, Cross Point, which would provide an important buffer between any prospective residential and/or commercial development, whilst protecting land of high community value.

As part of the proposed two urban extensions at Keresley and Eastern Green, significant tracts of green infrastructure are proposed. Once established, these green corridors will be assessed to establish their value as additional areas of local green space. This approach will also be taken forward in relation to the land around Charterhouse Heritage Park (policy HE3), the employment allocations at Whitley Business Park and Baginton Fields (Policy JE2) and the housing allocation at London Road / Allard Way (Policy H2:9).

National Guidance requires development proposals within areas designated as Local Green Space to be considered against local policies which are consistent with policy for Green Belt. This principle is broadly accepted through Policy GB1, however it is important to consider the context of Green Belt policy against that of Local Green Spaces. Any development within Local Green Spaces should for example not impact on the initial purpose of land being considered as a locally important green space or impact negatively on criteria set out in Paragraph 77 of the NPPF. Of particular importance is land used for recreational and leisure use, especially sports pitches. It is acknowledged that some developments may be required to support the continued use of sites as high-quality sports pitches (e.g. buildings for changing facilities and related teaching or training provisions) and this would be supported in principle. Other acceptable examples will include the provision of:

- new play equipment within parks and public spaces;
- appropriate and suitable parking facilities at parks and public spaces;

- appropriate lighting (in terms of scale and surrounding uses) to support sports facilities;
- the provision of appropriate and suitable footpaths and cycle ways to enhance accessibility to high quality green spaces.

In all cases development should be ancillary to the primary purpose of the Local Green Space. Should development prevent the continued use of land for sports pitches, or other forms of Local Green Space (as appropriate) this will not be supported.