

**LAND OFF TAMWORTH ROAD,
KERESLEY, COVENTRY**

PLANNING STATEMENT

ON BEHALF OF

LIONCOURT HOMES LIMITED

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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CONTENTS:

	Page No:
1. INTRODUCTION	1
2. THE SITE AND SURROUNDING AREA	3
3. THE PROPOSED DEVELOPMENT	5
4. PLANNING POLICY OVERVIEW	11
5. THE GREEN BELT AND VERY SPECIAL CIRCUMSTANCES	14
6. ASSESSMENT AGAINST NATIONAL PLANNING POLICY	23
7. ASSESSMENT AGAINST THE DEVELOPMENT PLAN	33
8. CONCLUSIONS	39

1. INTRODUCTION

1.1 This Planning Statement has been produced on behalf of Lioncourt Homes Ltd and supports an outline planning application for the development of land broadly located between Tamworth Road and Bennetts Road South, in the Keresley area of Coventry. The planning application seeks outline approval for the development of the site with reserved matters of scale, appearance, layout and landscaping reserved for subsequent approval at a later date. The access points to the site are to be considered now. The description of development is as follows:

“Outline planning permission for residential development of up to 800 dwellings, open space, vehicular access from Tamworth Road, primary school, local village centre including convenience store, community facilities, footpath and cycleways, nature conservation areas, play areas, allotments and associated infrastructure and all associated works”.

1.2 This Statement is designed to bring together additional supporting information accompanying the planning application and to set out the content of the planning application and the proposals in a clear, concise and informative way. The Statement will assess the merits of the planning application against prevailing planning policies at both the national and local tiers, as well as considering policies and guidance emerging in relevant new policy documents, and other material considerations.

1.3 The application site formed part of the Keresley proposal which included removing the site from the Green Belt and allocation for housing development, which formed a major part of the Council's Core Strategy 2009. The Core Strategy 2009 was examined by an Inspector and found to be a sound Plan. This included the proposal for Keresley Eco Suburb which the Inspector found suitable for 3600 houses.

1.4 The application has been considered by Coventry City Council to be of such significance as to merit Environmental Impact Assessment (EIA). The EIA process has been undertaken and consequently the application is supported by an Environmental Statement (ES). This comprehensive document includes many of the specific reports which would normally be expected to accompany a planning

application of this type. The Appendix to the ES (Volume 2) also contains the Transport Impact Assessment (TIA) and Flood Risk Assessment (FRA).

- 1.5 The proposal was subject to a large public consultation exercise which included an exhibition held in October 2013. Details of the consultation exercise and changes that resulted are summarised in the Consultation Statement.
- 1.6 In addition to the ES and Appendices the following reports form part of the planning application:

Planning Statement produced by Pegasus Group

Design and Access Statement produced by Pegasus Group

Illustrative Masterplan Layout produced by Pegasus Group

Framework Travel Plan produced by Phil Jones Associates

Sustainability Statement produced by Pegasus Group

Tree Survey, Hedgerow Survey and Arboricultural Impact Assessment
produced by Pegasus Group

Consultation Report produced by Pegasus Group

Topographical survey drawings

2. SITE AND SURROUNDING AREA

- 2.1 The site is contained between the Tamworth Road (B4098) to the west, Sandpits Lane to the south, Bennetts Road South forms the eastern boundary and the northern boundary is formed by the Hall brook. It has an area of 42.2 Ha. All of the land is open and in use for varying agricultural purposes and for the keeping of horses. It contains various trees, hedgerows and other landscape features.
- 2.2 Immediately to the south of the site on the opposite side of Sandpits Lane is the Cardinal Newman School and associated areas of playing fields. Sandpits Lane also contains the John Reay Golf Centre which consists primarily of a golf driving range and assorted facilities.
- 2.3 Adjacent to the site on Bennetts Road South is a ribbon development of housing constructed during the inter-war period. The northern portion of Bennetts Road South is predominantly open and forms part of the application site. Immediately to the north of the site is Manor Farm and its associated buildings. Bennetts Road South rises from Manor Farm in a southerly direction towards Sandpits Lane. A public footpath following the line of the Hall brook runs from Bennetts Road South immediately adjacent to Manor Farm in a west/east direction. This forms the northern boundary of the site. A further footpath runs to the south of Keresley Manor and this forms the northern boundary of the application site. Keresley Manor is set back from Tamworth Road and is located within an area of woodland. The western side of Tamworth Road, opposite the site, contains linear residential development comprising of detached houses. Further to the south the land becomes more open and this includes Coundon Hall Park, a very large area of public open space including substantial playing fields. Tamworth Road also contains the Royal Court Hotel which represents a significant feature in the surrounding area.
- 2.4 The wider area surrounding the site is characterised as part of the Coventry Urban Fringe. Notable features include various areas of residential development including Keresley Newland to the north, areas of Holbrook to the southeast and in particular Prologis Industrial Park to the northeast. Prologis is urbanising feature being in a prominent location and having bold colours used in the design of buildings.

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- 2.5 Other notable features within the site include the electricity line on substantial pylons which cross the site in a southeast/northwest direction. The Hall brook is another feature and this flows northwest/southeast. The brook corridor contains numerous trees and other vegetation.
- 2.6 The site is gently undulating. The highest point is located in the vicinity of Keresley Manor with levels generally dropping towards the east. The land rises towards the southern portion of Bennetts Road South.
- 2.7 Parts of the eastern part of the site are in use for equestrian purposes. Fields are often sub-divided to provide smaller areas of grazing for horses. The remainder of the site is largely in use for agricultural purposes in a mix of arable and pasture fields.
- 2.8 The site also contains three existing ponds. The first is located to the north of the Royal Court Hotel site close to Tamworth Road. Two of the ponds are located centrally within the site. These ponds would be incorporated within open spaces within the development and will be maintained as wetland areas.

3. THE PROPOSED DEVELOPMENT

3.1 The application is for outline planning permission. The nature of the outline application means that the detailed design of the proposed development has yet to be fixed. This will be subject to further design stages and in due course reserved matters planning applications.

3.2 The proposed development will comprise of the following:

- Up to 800 residential dwellings with a mix of size, tenures and types
- Provision of a local centre to potentially include small convenience store, crèche, cafe and community meeting room
- Primary school
- Public open space and green infrastructure including children's equipped play area, nature conservation areas, informal and incidental open space, retained and new landscaping, allotments and orchards
- Vehicular access to Tamworth Road and Bennetts Road South and also within the site.
- Associated infrastructure including surface water attenuation facilities, foul drainage and retained ponds.
- Network of pedestrian and cycle paths including greenway
- Development of village square plus other key note open spaces within the development

Residential

3.3 The proposed development will provide residential units with a range of dwelling types and tenures of various sizes. However in view of the location of the site on the edge of Coventry, there is a desire to accommodate aspirational dwellings of large 3 and 4 bedroom homes. The precise mix of the housing will be determined at the detailed design stage but the general mix of size and tenure will reflect the following:

- 25% of the total dwellings to be affordable
- The 25% affordable component to be split between social rented, affordable rented and intermediate housing
- Affordable housing to be delivered via a Section 106 Agreement

- 3.4 Lifetime home requirements will be met where practicable. In addition new development will accord with the relevant Code for Sustainable Homes in force at the time.
- 3.5 The homes will vary in height with the majority being between 2 and 3 storey. Taller buildings are likely to be located in specific locations to ensure variety and aid legibility, for example in and around the local centre or close to the major formal open spaces (the Greens).
- 3.6 The proposed maximum building heights for different areas of the site are identified on the Parameters Assessment Plan. Additional information is provided within the Design and Access Statement accompanying the planning application. This sets out how the design will be developed to provide a comprehensive and integrated new development.

Education, Community and Social Development

- 3.7 A local centre will be provided adjacent to Bennetts Road South. This facility will be available for residents of the new development but also for the existing community in the vicinity. This will contain the majority of the community, social and retail facilities. The local centre will provide a mix of the following uses:
- Convenience store (between 300 sq.m and 500 sq.m. gross floor area)
 - Community building suitable for crèche/gym/health facility
 - Suitable car parking within a landscaped setting
 - Access to Bennetts Road South as well as to the wider development to the west
- 3.8 A site for a primary school with associated grounds including playing fields and playgrounds is identified on the east of the site, immediately to the south of the proposed local centre. The location of the school has changed following feedback from the consultation event. It is envisaged that this school could be managed by the President Kennedy School and act as a new feeder school.

Public Open Space and Green Infrastructure

- 3.9 The proposed development will provide a comprehensive green infrastructure and open space network. This is based upon a series of greenways which link rural areas adjacent to the site and provide green corridors through the development

itself. Other open spaces are shown on the northern boundary (Water Meadows) and along the primary spine road avenue. The design has sought to break up the development so as to provide smaller neighbourhoods well integrated with their own open spaces in the forms of village greens.

- 3.10 The open space will include nature conservation areas. Existing wetlands/water features are all retained within the proposed development and utilised as ecological resources. The Hall brook runs through the site and this will be maintained and integrated into the proposal.
- 3.11 The open spaces which permeate the site can also have a function as a nature conservation corridor, allowing wildlife to permeate through the site and into the rural areas beyond.
- 3.12 A more formal village square is proposed adjacent to the local centre. This will provide a landscaped setting for the local centre as well as providing a suitable gateway into the development from the east.
- 3.13 In addition to the main public spaces there will also be private open space. This will take the form of private gardens, balconies, terraces and communal spaces around buildings.
- 3.14 Formal playing fields, with the exception of land included as part of the primary school, are not provided within the development due to the over provision on land immediately adjoining the site. This includes Coundon Hall Park, Cardinal Newman School, the playing fields associated with the former Coventry Colliery and Keresley Sports Club and President Kennedy School.

Vehicular Access and Circulation

- 3.15 The primary vehicular access route would run east-west through the centre of the site providing a new direct link from Tamworth Road to Bennetts Road South. New residential areas would be served off secondary roads linked to the primary road network.

Drainage and Flood Risk

- 3.16 The assessment of the impact of flood risk is based on the Flood Risk Assessment prepared for the application site in accordance with the NPPF. A copy of this is

included in the Appendix to the ES. It addresses, identifies and quantifies the risk from various sources of flood risk to the site. It draws on information obtained from the Environment Agency, Coventry City Council, the Coventry Level 1 and 2 Strategic Flood Risk Assessment, the Coventry Preliminary Flood Risk Assessment, site observations and local residents input at a public consultation event. The risk associated with surface water, ground water and sewage has been assessed qualitatively using available information.

3.17 The Environment Agency Flood Map and the Level 1 Strategic Flood Risk Assessment indicate the entire site is within Flood Zone 1. However as the catchment area of all the watercourses within the site is less than 3km² and so are not included on the flood map, modelling of the Hall Brook has been undertaken to ascertain the extent of the floodplain. The results show that the floodplain of the Hall Brook within the site boundary is limited to a narrow strip along the northern boundary and that the majority of the floodplain is located beyond the site boundary on adjacent land north of the watercourse.

3.18 The proposal provides for a number of mitigation measures which include the following:

- Careful storage of construction materials and plant to ensure that they are managed in the event of flood and ensure they do not cause a pollution incident
- Controls on vehicle refuelling to contain any pollutants

3.19 Measures post development will include the following:

- Limiting post development discharge rates into the Holbrook to existing average annual run-off rates less 20% and including the 1in 100 year plus 30% event
- Exiting post development discharge rates into the existing surface water sewage system shall be limited to existing average annual run-off rates less 20% for all rainfall events up to and including the 1 in 30 year event
- Surface water drainage system will incorporate SUDS techniques to store and treat surface water

- Proposed surface water drainage system will be designed to manage adverse off-site conditions in terms of surcharged outfalls
- Designing dwellings to have a finished floor level at least 0.15 metres above adjacent ground levels
- Incorporate surface water overland flow corridors

3.20 The above measures and management of surface water flooding represent an improvement on the existing situation with benefits in terms of lowered flood risks downstream. Consequently the proposed development is able to provide an improvement to the wider area and assist in addressing a recognised local problem.

Construction Phasing of the Development

3.21 It is acknowledged that the phasing of development will be discussed further at the more detailed stages, however for the purposes of the assessment it is envisaged that the proposed development will commence by 2016 and be completed by 2024. Development is likely to first commence around the proposed site access to Tamworth Road in two separate phases incorporating land north and south of the western greenway. A start could also be made on the eastern portion of the site providing the new local centre, primary school and associated residential development. An indicative phasing plan which illustrates one potential way the site could be built out is provided at **Figure XY**. For the assessment purposes this assumes approximately 100 dwellings per year over an approximately 8 year build programme (2016-2024).

3.22 The construction phase for the site is likely to involve Standard Construction Practices and enabling works including:

- Utilities works including diversion, upgrades and new provision
- Highway works which are likely to incorporate other infrastructure services
- Temporary access and haul routes, site compounds, hoardings, temporary signage and car parking
- Site re-grading/standard ground modelling to create the required development plateau. The development plots and sizes will be sited to work with the topography of the site to minimise the cut and fill requirements.

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- Soil stripping and recycling/temporary stock piling within the site, the location and scale of which is likely to be specified and approved as part of the earthworks strategy for the development.
 - The use of construction machinery such as general plant, forklifts, lifting equipment and other light and heavy haulage commercial vehicles
 - Early implementation of an approved landscape scheme where appropriate; and
 - Standard construction and good site management practices will be adopted prior to the commencement of construction to ensure that both statutory and non-statutory environmental commitments are adhered to. For example this could include a Code of Construction Practice and/or Construction Environmental Management Plans.

4. PLANNING POLICY OVERVIEW

- 4.1 The development proposals take into account a wide range of planning policies at the national and local levels.
- 4.2 This section provides an overview of the planning policies and guidance which have been identified to be of relevance to the proposals. The credentials of the proposals are assessed against the different policy themes and specific policies in the following sections 5 and 6. It is not the intention to reproduce the policy wording separately, rather it is of greater value to the reader to provide an assessment of the proposals directly against the different policy areas.

Current Development Plan position

- 4.3 The Coventry Development Plan (CDP) was adopted in 2001 and covered the period 1996-2011. It is now, therefore, time-expired and the policies are out of date in terms of their compliance with the National Planning Policy Framework (the Framework) which was published in March 2012. In particular the CDP does not reflect certain key components of the Framework such as the need to boost significantly housing supply.
- 4.4 Two subsequent Core Strategies, intended to replace the CDP, were prepared for Coventry in 2009 and 2012, with the former the subject of an Inspector's Report following an Examination in Public. The Core Strategy 2009 included the application site as forming part of the Keresley Eco Suburb. The Keresley proposal included the removal of an extensive area of Green Belt and designated the Keresley site as reserved land for housing development of 3,600 homes and a country park.
- 4.5 However the 2009 Core Strategy was abandoned after the Council Elections and formally withdrawn in October 2012. The more recent 2012 Core Strategy went through the initial stages of Examination by the Secretary of State in early 2013, but was withdrawn following the initial findings of the Inspector in March 2013 that the Council had failed to meet its duty to cooperate.
- 4.6 The Development Plan position now falls back to the 2001 CDP which is out of date, however there is no other emerging policy for the city that can be given any

weight in decision making at this time. The NPPF must therefore be given primacy in decision making on planning applications, but for completeness, reference is made in this Planning Statement to relevant policies in the CDP and the degree of weight to be attached to them.

Relevant planning policies

National planning policies:

- National Planning Policy Framework

Coventry Development Plan 2001:

- Part 1 policies:
 - OS1: The objectives and outcomes of the plan
 - OS3: Local area regeneration
 - OS4: Creating a more sustainable city
 - OS5: Achieving a high quality city
 - OS8: Equal opportunity
 - OS9: Access by disabled people
 - OS10: Planning obligations
- Housing:
 - H1: People and their housing needs
 - H2: Balancing new and existing housing stock
 - H7: Housing land provision
 - H9: Windfall additions to housing supply
 - H10: Affordable housing
 - H12: Design and density of housing development
- Access and Movement:
 - AM3: Bus provision in major new developments
 - AM9: Pedestrians in new developments
 - AM12: Cycling in new developments
 - AM17: Car parking
 - AM22: Road safety in new developments

- Built Environment:
 - BE2: The principles of urban design
 - BE3: Design statements as part of major planning applications
 - BE20: Landscape design and development
 - BE21: Safety and security

- Green Environment:
 - GE8: Control over development in urban green space
 - GE9: Green space provision in new housing developments outside the city centre

- Supplementary Planning Guidance/Documents:
 - Delivering a More Sustainable City (January 2009)
 - Affordable Housing (February 2006)

- Local Development Framework documents:
 - Annual Monitoring Report (December 2012)
 - Coventry and Warwickshire Joint Strategic Housing Market Assessment (November 2013)

Other relevant documents:

- Grant Shapps letter to Leaders of Housing Growth Local Authorities (2 July 2010)
- Ministerial statement 'Planning for Growth' (31 March 2011)
- Laying the Foundations (November 2011)

The Latest Position

4.7 In terms of housing needs the latest position is that set out in the Coventry and Warwickshire Joint Housing Market Assessment (2013). This assesses housing need in Coventry to be 1,180 per annum over the period of 2011-2031 (23,600). This figure does not relate directly to a housing requirement, as that figure would need to take account of other factors such as vacancy rates and second home ownership, but it gives a clear indication of the scale of new housing needed in the City.

5. THE GREEN BELT AND VERY SPECIAL CIRCUMSTANCES

5.1 The site is almost entirely located within the Green Belt as defined in the Coventry Development Plan adopted on the 9th December 2001. Policy GE6 of the adopted Coventry Development Plan states inappropriate development will not be allowed in the Green Belt unless justified by very special circumstances. The supporting text identifies a number of specified purposes which are not inappropriate development and these consist of:

- Agricultural and forestry
- Essential facilities for outdoor sport and outdoor recreation
- Cemeteries
- Limited extension, alteration or replacement of an existing dwelling.

5.2 More recent policy is contained within the NPPF. The NPPF reaffirms that the construction of new buildings is inappropriate in the Green Belt. Exceptions to this are:

- Buildings for agriculture and forestry
- Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries
- The extension or alteration of a building providing it does not result in disproportionate additions over and above the original building
- The replacement of a building provided that it is not materially larger than the one it replaces
- Limited infilling in villages and limited affordable housing for local community needs in accordance with the policies set out in the Local Plan or
- Limited infilling or the partial or complete redevelopment of previously developed sites whether redundant or in continuing use which would not have a greater impact on the openness of the Green Belt and for the purposes of including land within it than the existing development.

5.3 New residential development as envisaged in the planning application clearly does not constitute appropriate development in the Green Belt. The NPPF makes clear that as with previous Green Belt policy, inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special

circumstances. It therefore follows that for a planning application to be approved very special circumstances must exist to justify a departure from Green Belt policy.

- 5.4 A Written Statement by the Planning Minister Nick Bowles on the 6th March 2014 noted, amongst other things, that unmet housing needs is unlikely to outweigh the Green Belt or other harm to constitute very special circumstances justifying inappropriate development. Nevertheless it is evident that housing need can form part of a 'package' of overall benefits sufficient to provide the very special circumstances which could justify inappropriate development. This is considered to be the case in association with the Keresley proposal.

Housing Need

- 5.5 The Council are currently preparing a third Development Plan which will set out the likely housing requirement. It is evident that the 2009 Core Strategy identified a housing requirement of 33,500 dwellings between 2006 and 2026 of which 26,500 had to be accommodated in the City (7,000 dwellings were to be outside but adjacent to the city boundary). The strategy for meeting this housing requirement as set out in the 2009 Core Strategy was considered by an independent Planning Inspector and found to be 'sound'.
- 5.6 The 2012 Core Strategy provided for a significantly reduced housing requirement of 11,373 dwellings between 2011 and 2025. This accounted for 669 dwellings per annum. This document was subject to an initial examination by an independent Planning Inspector who found after a preliminary hearing that in preparing the Core Strategy the Council had not discharged its duty to cooperate. As a consequence the Council withdrew the Core Strategy from the Examination.

Joint SHMA

- 5.7 As part of the preparation of the latest version of a Development Plan (the Coventry Local Plan) the Council, in partnership with Warwick District Council, Rugby Borough Council, North Warwickshire Borough Council and Nuneaton and Bedworth Borough Council, have jointly commissioned a Strategic Housing Market Assessment (SHMA) for the Coventry and Warwickshire area. This independent assessment identified an overall housing need for the period 2011 – 2031 within Coventry of 1,180 dwellings per annum (23,600 homes over the period). This is

considerably in excess of the level of completions that have been achieved within Coventry in any of the last three years¹ (for 2010/11 there were 705 net completions and in 2011/12 921 net completions).

5.8 The above information demonstrates that annual housing requirements in Coventry will need to increase significantly and this will be challenging to achieve, even before the backlog from under delivery is considered and in addition to the new requirements year on year. This will inevitably require the identification of a significant number of new development sites to meet the five year supply requirement necessary under the Framework. The Framework states that a 5% buffer should be added to supply to enable flexibility and competition in the supply.

5.9 In considering the key Development Plan policy relating to new residential development, Policy H9 of the adopted UDP states proposals for housing developments on sites not identified in either Policy H8 or in the City Council's 1997 Unitary Development Plan Monitor will be permitted subject to:

- Compatibility with nearby uses
- The provision of an attractive residential environment
- Convenient pedestrian access to local facilities
- Being well served by public transport and computability with other plan policies.

5.10 The release of Greenfield sites exceeding one hectare is stated to only be permitted if it is shown to be necessary to meet the dwelling requirements for the following five years.

5.11 As set out above, in the context of a significant increase in housing requirement which outstrips housing supply, the Keresley site should be considered positively as it will be able to deliver significant new housing in order to assist meeting the Council's five year housing land target. The land is free from physical constraints and would deliver significant amounts of housing in the short term.

¹ Council's Annual Monitoring Report December 2012

5.12 The anticipated delivery of housing will be dependent on a number of factors some of which will be related to market conditions. These are likely to be in the range of 100-150 units per year with 2 outlets. The maximum period for the build out of the site is likely to take 8 years. The table below sets out a range of potential con housing to be delivered from the site is as follows:

<u>Year</u>		<u>Total</u>		
2016/17	100 dwellings per annum (2 outlets)	100	150 dwellings per annum (2 outlets)	150
2017/18		200		300
2018/19		300		450
2020/21		400		600
2021/22		500		750
2022/23		600		800
2024/25		700		
2025/26		800		

5.13 The supporting information forming the planning application, including that contained within the Environmental Statement, demonstrates that each of the bullet points set out in Paragraph 5.9 above are complied with. In particular the Design and Access Statement and Transport Assessment demonstrates that the site will deliver an attractive development that integrates with the surrounding area and provides a number of benefits. It will be well served by public transport. Existing facilities are located in close proximity to the site and new facilities will be provided directly as a consequence of the proposal. The proposed development will therefore comply with Policy H9 of the UDP.

5.14 Providing a housing development which would contribute significantly to meeting an acknowledged housing need, in a manner which complies with a key component of the adopted Development Plan (Policy H9), is a significant material consideration.

The 2009 Core Strategy

- 5.15 The housing requirement set out in the Plan was based upon the West Midlands RSS Preferred Option of 33500 new dwellings in or on the edge of Coventry up to 2026. The 2009 Core Strategy identified a housing supply 2006 – 2026 as follows:
1. Total net capacity within the existing urban area 22,940 dwellings
 2. To make up the shortfall of 10,700 dwellings against the requirement of 33,500, the Plan identified a number of Green Belt locations as being suitable for housing development. The Green Belt allocations amounted to 3,900 dwellings. The largest of the Green Belt locations was Keresley which was identified for a housing target of 3,600.
 3. In addition to the allocations in the Green Belt within Coventry, a further 7,000 dwellings were to be allocated adjacent to Coventry City but in Warwick District and Nuneaton and Bedworth Borough.
- 5.16 When the Plan was examined during the period November – December 2009 the Planning Inspector found the Keresley proposal to be sound and it should be reserved for 3,600 houses and excluded in its entirety from the Green Belt. Other Green Belt housing sites, such as that identified at Cromwell Lane, were not found to be acceptable by the Inspector and were deleted from the Plan.
- 5.17 It is clear from the above that if the Council are going to provide for their objectively assessed housing needs for housing, which is likely to be at least 23,600 dwellings over the period 2011 – 2031 based on the Joint SHMA, then a site of the scale of the original 2009 Core Strategy proposal for Keresley will be necessary. It should be recognised that the 2009 Core Strategy allocated land sufficient to provide for 26,500 within the city boundary. However the plan period has now been rolled forward 5 years and during the period 2006-2011 a significant amount of the previous capacity within the urban area will have been used up necessitating greenfield/Green Belt release of land. The table below sets out that the number of completions on previously developed land.

	<u>Net Completions</u>	<u>% on PDL</u>	<u>Total PDL Completions</u>
2006/2007	1165	85	990
2007/2008	1149	93	1063
2008/2009	680	99	673
2009/2010	496	98	486
2010/2011	705	96	677
Total 2006/2011			3889²

5.18 From the above it is evident that the City will have to find a similar level of new housing as was the case in the 2009 Core Strategy. The requirement in the 2009 Core Strategy was 26,500 dwellings for a plan period starting in 2006. During the 5 years since 2006 around 3,899 dwellings have been constructed in the urban area. Consequently with the current need for at least 23,600 dwellings, a green belt release of over 3,000 dwellings will still be necessary. The Keresley site has already been proven sound by an Inspector dealing with a similar sized housing requirement in 2009 Core Strategy examination. The planning application site sits entirely within the Keresley Eco Suburb site. This represents a very significant supporting factor to the planning application

Recreational Benefits

5.19 As part of the consultation exercise undertaken as part of the planning process it became clear that President Kennedy School were keen on associating itself with the proposal and taking on board the primary school. As a result of further discussions with President Kennedy School it became apparent that notwithstanding the significant improvements to the school that are currently taking place, the existing swimming pool facility was in need of major refurbishment. The swimming pool did not form part of the improvement works to the remaining school buildings, even though it was a public facility and was very popular with the local community. Following further discussions with Lioncourt Homes a proposal has been put forward to enhance/refurbish the swimming pool building to provide contemporary facilities. This would include much improved facilities for people with disabilities including separate changing provision. At the present time disabled people cannot access the pool directly from changing facilities at the same level as the pool side. The refurbishment of the swimming pool can be delivered as one of the package of measures set out in

² Source – 2011 and 2012 Annual Monitoring Reports

the section 106 Agreement. These works represent a substantial improvement to existing recreation facilities in the local area and will provide a clear public benefit to the local community.

Other Factors

5.20 The proposal will be providing substantial new areas of public open space. These will be designed to provide a range of functions that will be linked to form linear corridors. These will benefit wildlife as well as integrating the proposal within the existing urban context. These new open spaces will be available both to residents of the new residential development but also for the existing community. It will form the basis of off-street circular cycle/pedestrian walking routes. The new open spaces will also be designed to provide for enhanced wildlife habitats. Again this will be a benefit for the existing area available to both residents of the development and the existing community.

Very Special Circumstances

5.21 National policy on Green Belts has been considered in the Courts on a number of occasions. The following two judgements are of particular significance. The judgement in Basildon District Council, R v Temple (2004) is of particular relevance when considering whether very special circumstances can be made up of a number of individual benefits which cumulatively can be considered 'very special':

- In the Wychavon District Council the Secretary of State for the DCLG and other (2008) Court of Appeal decision relating to a site at Upton Warre, Worcestershire, it was held that the words 'very special' should not be interpreted as meaning the converse of 'common place'. Whilst a rarity factor may contribute to the special quality of a particular factor the decision maker must undertake a qualitative judgement as to the weight to be afforded to a particular factor. The Judge (Carnwath LJ) noted that it was incorrect to look for the unusual or uncommon in weighing other considerations as a pre-requisite for finding that very special circumstances exist.
- In a consistent judgement Sullivan J in Basildon District Council, R (on the application of) v Temple (2004) stated that in planning

judgements, as in ordinary life, a number of ordinary factors which in themselves were not 'very special' may when combined together amount to very special circumstances. Whether a particular combination of other considerations amount to a very special circumstance is a matter for the planning judgement of the decision maker.

5.22 In accordance with the above judgements it is evident that the proposal will deliver a number of significant benefits. These include some which may not be considered particularly unusual but others such as the refurbishment of the President Kennedy swimming pool which would be. In summary these are:

- Assisting in addressing housing need based on the objectively assessed needs of Coventry.
- Meeting the need in a location which has already been tested by an Inspector and found to be acceptable for large scale housing development.
- Providing housing in a location where it has been demonstrated that the Green Belt boundaries can be redrawn to allow for new housing to come forward in accordance with the 2009 Core Strategy.
- Delivery of substantial improvements to local recreation facilities in the form of the refurbished swimming pool at President Kennedy School.
- Enhanced areas of public open space which will be publically available and provide for new cycle and pedestrian routes thus aiding the creation of healthy communities
- Creation of new wildlife habitats.

5.23 In addition it is also evident that the proposal would not be contrary to the five purposes of including land in the Green Belt. It would not result in the unrestricted sprawl of a large built up area. This has been demonstrated through the independent analysis of the 2009 Core Strategy by the Inspector who concluded that the Keresley proposal was clearly the most preferable and in particular an urban extension on this edge of the city would not threaten the integrity or material extent of the strategically important Meridan gap. The Inspector did note that the higher land to the northwest was less well suited to satisfactorily accommodate new built development than other parts closer to the existing developed areas. The application avoids the north west of the site and is

located immediately adjacent to the existing developed areas. It therefore represents the most suitable land for new development. In particular the Inspector noted at Paragraph 3.161 of his Report that the available evidence underpinning the 2009 Core Strategy provides a robust and credible justification that the Council's overall review process of sites in the Green Belt in order to find new housing land was thorough. It was sufficiently detailed to inform the strategic choices that had emerged over time into the 2009 Core Strategy. In particular the Inspector noted:

“it was clearly based upon an appropriate interpretation of the five purposes of including land in the Green Belt, at each stage, and of the potential detailed suitability of the various locations, taking into account the comprehensive technical information available”.

- 5.24 In view of the above very special circumstances have been demonstrated to allow the planning application to be approved and ensure that the development of the site will not prejudice the wider extent and strategic importance of the Green Belt around Coventry.

6. ASSESSMENT AGAINST NATIONAL PLANNING POLICY

6.1 National planning guidance is set out within the National Planning Policy Framework (the Framework), which was published in March 2012. It sets out that the purpose of the planning system is to contribute to achieving sustainable development and this core principle remains at the heart of the guidance, with the whole of the document representing what this means for the planning system.

The roles of the planning system in this respect include the following:

- An **economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation;
- A **social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- An **environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

6.2 The Ministerial foreword by the Rt. Hon. Greg Clark MP, the then Minister for Planning, is clear that development which is sustainable should go ahead without delay. He states that development means growth and that sustainable development is about change for the better.

The presumption in favour of sustainable development

6.3 At the heart of the Framework is the '*presumption in favour of sustainable development*'. Read as a collective, the application package containing this and other supporting documentation, demonstrates that this proposal delivers sustainable development.

6.4 Paragraph 14 of the Framework identifies that the presumption in favour of sustainable development should be seen as a golden thread running through plan making and decision taking. In respect of the latter, this means:

“Approving development proposals that accord with the Development Plan without delay”

6.5 In addition the paragraph states that:

“Where the Development Plan is absent, silent or relevant policies are out of date, granting permission unless:

- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or***
- Specific policies in this Framework indicate development should be restricted”***

6.6 Footnote 9 to paragraph 14 lists examples of such specific policies such as Site of Special Scientific Interest, Green Belt land, Areas of Outstanding Natural Beauty and National Parks. Whilst the site does fall in the Green Belt, it has been demonstrated that there are material considerations associated with the development of such significance to constitute the very special circumstances necessary to outweigh Green Belt policy.

6.7 Paragraph 197 further states that in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.

6.8 With respect to paragraph 14 of the Framework, the relevant Development Plan policies relating to housing land provision in the Coventry Development Plan (CDP) are out of date and given that the plan is now time-expired, the plan is silent about the provision of land to meet housing needs beyond 2011. The second paragraph of paragraph 14 as detailed above is therefore directly applicable to the proposed development.

6.9 The housing supply position in the city and the implications of the out of date CDP are discussed in further detail later in this Statement.

6.10 Added to the above, the application package demonstrates that the adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits when assessed against the Framework. The proposal involves not only new housing but also a local centre, primary school and areas of public open space. These all contribute towards achieving a sustainable development.

Economic, Social and Environmental Aspects

6.11 The proposed development will contribute towards all three of the key themes of sustainable development. In addition to meeting what is a clear need for housing, including affordable housing, the proposal will have evident economic benefits. This is through not only the construction of new buildings and infrastructure which will create new employment, but also associated with the non-residential elements. Jobs will be created in the local centre at the convenience store, as well as at the new primary school and these are likely to be particularly suitable for local people.

6.12 The Primary School and potentially new community building (which could include medical facilities) in the local centre will both contribute to improving social aspects of life in Keresley. This would also be supplemented by the 25% affordable housing component which would provide new homes for local people unable to afford market housing.

6.13 The proposal will retain the majority of trees and hedgerows on the site and provide new areas of public open space. This can be designed to provide new habitats for wildlife as well as for recreation purposes. The development will also involve the planting of significant numbers of new trees and other landscaping which will have environmental benefits.

6.14 In view of the above the proposal will clearly contribute towards each of the three themes in sustainable development.

6.15 The sub headings set out in this section below continue to summarise key aspects of the Framework and how it envisages the delivery of sustainable development. Paragraph 197 of the Framework then directs that the presumption in favour of granting permission for the sustainable development should apply.

Building a strong, competitive economy

- 6.16 Paragraph 20 of the Framework outlines that to help achieve economic growth, local planning authorities should plan proactively to meet development needs of business and support an economy fit for the 21st century. In order to do so Paragraph 21 goes on to set out that planning policies should recognise and seek to address potential barriers to investment, including a poor quality environment or a lack of infrastructure services or housing.
- 6.17 The proposed development site will deliver much needed housing, both market and affordable. The need for a significant amount of housing into the future has already been acknowledged by the City Council both through the formal public examination of the Core Strategy in 2009 (although withdrawn) which was also found to be sound by the Inspector appointed by the Secretary of State. In early 2013, the revised Core Strategy could not proceed further to formal examination. The latest evidence on housing needs (December 2013) points again to significant requirements – this is considered further in the following section of this Statement.

Promoting Sustainable Travel

- 6.18 Paragraph 32 of the Framework sets out that all developments that generate significant amounts of movement should be supported by a Transport Assessment (TA). The application package is supported by both a TA and a Travel Plan Framework. Read together these demonstrate that the application proposal takes up the opportunities for sustainable transport modes and that safe and suitable access to the site can be achieved, along with provision for an alternative emergency access point. The a Travel Plan Framework accounts for the fact that the application is at outline stage and a more detailed package of travel measures can be developed once detailed design proposals are developed for the reserved matters.
- 6.19 The proposal, in providing a local centre and primary school as part of a mixed use development, will be minimising the need to travel and will provide good cycle and pedestrian links so as to minimise the use of the car. This will help promote sustainability.

Delivering a wide choice of high quality homes

6.20 The Government's ambition is to "boost significantly the supply of housing" as stated at the beginning of paragraph 47. The first bullet point is clear that local planning authorities should:

"use their evidence base to ensure 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, including identifying key sites which are critical to the delivery of the housing strategy over the plan period."

6.21 It goes on to require local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements, with an additional 5% to 20% buffer depending on past performance on delivery. Deliverability is a key aspect of the housing supply in order to ensure that need can be met year on year and the buffer is designed to allow flexibility in delivering sites in this respect.

6.22 In relation to evidence about housing, paragraph 159 of the Framework states that Authorities should have a clear understanding of housing need in their area. Reference is made to the preparation of Strategic Housing Market Assessments (SHMA) and Strategic Housing Land Availability Assessments (SHLAA). Both have been carried out for the Coventry Local Authority area, most recently the SHMA published in November 2013 which jointly covers Coventry and Warwickshire and envisages challenging housing targets for the city over the period up to 2031. This is considered in further detail in the following section in terms of local planning policy.

6.23 Paragraph 49 of the Framework states that housing planning applications should be considered in the context of the presumption in favour of sustainable development, and that relevant policies for the supply of housing should not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites. Consideration must therefore be taken in light of paragraph 14 of the Framework as to whether such a development proposal constitutes sustainable development and whether the presumption in favour of such development is engaged.

Requiring good design

6.24 It is outlined in paragraph 56 of the Framework that good design is a key aspect of sustainable development, which is indivisible from good planning, and which should contribute positively to making places better for people. It is further set out that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (paragraph 57). Paragraph 58 states that planning decisions should aim to ensure that developments:

- ***“Will function well and add to the overall quality of the area;***
- ***Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;***
- ***Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;***
- ***Respond to local character and history, and reflect the identity of local surroundings and materials;***
- ***Create safe and accessible environments; and***
- ***Are visually attractive as a result of good architecture and appropriate landscaping.”***

6.25 The design concept delivers the design objectives set out above, and as explained in detail in the accompanying DAS. In particular the DAS sets out the full analysis of the physical, social and economic context of the site. The DAS demonstrates that the development proposed is legible, accessible and safe. It is easy to navigate through for pedestrians, cycles and vehicular traffic, routes for which are separated through the use of central open space for pedestrian and cycle access routes.

6.26 There is a clear relationship between the different components of the development as a result of the careful siting of units which tie together to create a new residential environment wholly in sympathy with the surrounding context of both a built-up and rural environment.

Promoting healthy communities

- 6.27 Paragraph 69 of the Framework notes that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. As part of decision making the provision and use of shared space, community and other local services should be planned positively to enhance the sustainability of communities and residential environments (paragraph 70).
- 6.28 The proposed development is able to go to great lengths to achieve these aims, where a significant area of open space can be opened up for public use. These areas will allow for informal open space, walking routes and have the potential to provide for more formal play areas and spaces where appropriate through more detailed submissions at the reserved matters stage. The proposed retention of existing green infrastructure and habitats, as well as the introduction of new landscaped areas are key parts of the overall contribution of open space to the function of the new housing community. The provision of local facilities such as the new local centre and primary school will also promote use of walking and cycling as they will be integrated within the new housing.
- 6.29 In addition the proposed development will include substantial contributions towards refurbishing the President Kennedy Swimming Pool. This will clearly assist in providing key sports facilities in the local area and assisting in promoting a healthy community.

Meeting the challenge of climate change, flooding and coastal change

- 6.30 The Framework addresses climate change and flooding, and paragraph 93 sets out that planning plays a key role in reducing greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy. The ES plus appendices has set out how the proposal is not located in an area subject to flooding and that there is a suitable drainage strategy to ensure it will control any surface water flows off site.
- 6.31 The Sustainability Statement prepared to support this planning application submission demonstrates how the principles of sustainable development have and will continue to influence the design, construction and operation of the proposed

scheme. These measures will enable future occupants to incorporate sustainable living patterns to achieve reduced energy requirements.

Conserving and enhancing the natural environment

6.32 Paragraph 118 of the Framework notes that when applications are being determined, local planning authorities should aim to conserve and enhance biodiversity by, amongst other things, encouraging the incorporation of biodiversity in and around developments. Permission should be refused where development would result in the loss or deterioration of irreplaceable habitats (e.g. ancient woodland or aged veteran trees outside ancient woodland) unless the needs and benefits of the development outweigh the loss.

6.33 An Ecology Report forms part of the ES and therefore part of this application submission. The Ecology Report concludes that habitats on the site are not of such significance to impact on the principle of development.

Conserving and enhancing the historic environment

6.34 Paragraph 128 of the Framework states that in determining applications LPAs should require an applicant to describe the significance of any heritage assets affected, with the level of required detail being proportionate to the importance of the assets. The ES includes Archaeology and Cultural Heritage Chapters which provides a detailed assessment of the proposal and concludes that with suitable mitigation the proposal will not result in material harm.

Decision Taking

6.35 Paragraph 186 of the Framework is clear that LPAs:

“should approach decision taking in a positive way to foster the delivery of sustainable development”.

6.36 Paragraph 187 continues that LPAs:

“should look for solutions rather than problems, and decision takers at every level should seek to approve applications for

sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions for the area”.

- 6.37 In determining planning applications, Paragraph 196 states that the Framework is a material consideration. Paragraph 197 reiterates that in assessing and determining proposals *“local planning authorities should apply the presumption in favour of sustainable development”*. These parts of national guidance are of significant weight in this case, where Coventry City Council does not have an up-to-date and Development Plan in place.

Planning Practice Guidance (PPG)

- 6.38 The PPG makes clear that good quality design is an integral part of sustainable development. As a core planning principle plan makers and decision takers should always seeks to secure high quality design. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic and infrastructure and other such resources to the best possible use – over the long as well as the short term.
- 6.39 Issues which should be considered in design include local character; safe connected and efficient streets; a network of green spaces and public places; access and inclusion and cohesive and vibrant neighbourhoods. The Design and Access Statement has sought to address all of these issues in a comprehensive fashion. This approach has also fed into the production of the illustrative Masterplan for the site. The Design and Access Statement also sets out in detail how the proposal has addressed design policy including that contained within the PPG.
- 6.40 The PPG indicates that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years supply of housing. As part of this local planning authorities should consider both the delivery of sites against the forecast trajectory and also the deliverability of all the sites in the five year supply. By taking a thorough approach on an annual basis local planning authorities will be in a strong position to demonstrate a robust five year supply of sites. Demonstration of a five year supply is a key

material consideration when determining housing applications. It is also central to demonstrating that relevant policies for the supply of housing are up to date in applying the presumption in favour of sustainable development. Whilst the PPG sets out that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm necessary to constitute the “very special circumstances” justifying inappropriate development in the Green Belt, in this case housing need is only one component of a number of benefits in support of the proposed development. In combination the circumstances set out in Section 5 provide the necessary support for the proposal.

- 6.41 The approach to identifying a record of persistent under-delivery of housing involves questions of judgement for the decision maker in order to determine whether or not a particular degree of under-delivery of housing triggers the requirement to bring forward an additional supply of housing. Local planning authorities should aim to deal with any undersupply within the first five years of the Plan period where possible.
- 6.42 Planning Obligations mitigate the impact of unacceptable development to make it acceptable in planning terms. Obligations should meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development and fairly reasonably related in scale and kind.
- 6.43 The guidance also gives detailed information relating to Transport Assessments and Travel Plans. This information has been taken into account in the Transport Assessment provided for the planning application and contained within the appendices to the Environmental Statement. The Travel Plan is also included within the ES.

7. ASSESSMENT AGAINST THE DEVELOPMENT PLAN

7.1 The development plan for the site consists of the saved policies of the adopted City of Coventry Unitary Development Plan 1996-2011, adopted in 2001. It is now clearly time-expired as it only covers the period up to 2011. In this instance, paragraph 215 of the Framework states that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, and that the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.

Growth Point status

7.2 On 24 October 2006 the Government specified a number of growth points across the country which would be allocated funds to support additional levels of housing above those specified in the adopted the then adopted Regional Spatial Strategies. Since then the Regional Strategies have been abolished, however the period for additional growth was intended to run between 2006 and 2016 and increases the level of housing for Coventry by an additional 9,000 dwellings over this period above the adopted RSS requirement, which at the time was 830 dwellings per annum. The Growth Point status doubled this annual target and requires a new, large supply of land to come forward for development.

7.3 It is unclear the extent to which Coventry City Council remains part of the Growth Point programme, but in the event it does, the housing proposals for land in Keresley contribute towards the City's challenging ambitions for increased housing growth under its Growth Point status.

City of Coventry Unitary Development Plan 1996-2011

7.4 The majority of policies within the UDP were saved by the Secretary of State beyond 27 September 2007. Policy H7: Housing Land Provision, however, was not saved beyond this period by due its significant reliance on windfall development towards its housing requirements.

7.5 This section of the Statement deals with the policies within the CDP which are relevant to the proposals for the development of the application site, and it provides an assessment of the scheme against these policies.

Overall Strategy

- 7.6 The 'Overall Strategy' for the Plan area is set out in Chapter 2 of the CDP and sets out the objectives of Economic Regeneration, Social Equality and Environmental Quality. Policy OS3 encourages local area regeneration initiatives throughout the City in order to help improve local economic conditions, create jobs for local people, encourage the redevelopment of previously-developed sites, and to remove dereliction and contamination, amongst other things. Policy OS4 seeks to apply the developing concepts and techniques of sustainability to policies within the plan, with the requirement of Sustainability Assessment in respect of large-scale or high impact development proposals.
- 7.7 The accompanying Sustainability Assessment submitted as part of this planning application meets the requirements of Policy OS4. This Planning Statement assesses generally how the proposals meet the aspects of the Overall Strategy of the CDP, with reference to additional information provided by the wider consultant team.
- 7.8 Policy OS5 seeks to achieve a high quality city through the implementation of a range of measures including design, land use compatibility, lighting, security and access, many of which are assessed through more specific policies later in this section of the Statement.
- 7.9 Policy OS10 deals with Planning Obligations which will be used to further the Plan policies to ensure that development contributes to a regenerated, sustainable and high quality City. The general principles noted in the policy include provision or funding for additional or improved social, transport and other communal infrastructure, facilities and services in fair and reasonable proportion to the demands arising from the proposed development. The policy also includes the provision of features of developments which are a material consideration in favour of granting planning permission. Potential planning obligations arising from the proposed development will be discussed with Officers at the Council and are likely to principally involve the provision of a refurbished swimming pool at President Kennedy School, new primary school, affordable housing, provision towards secondary education capacity where necessary, transport improvements and the management/enhancement of public open space.

Housing

- 7.10 Chapter 4 of the UDP sets out housing policies for Coventry, with the overall housing strategy stating that all existing and future citizens should have access to a range of housing that is of satisfactory size and condition and within a high quality residential environment (policy H1). Policy H2 states that the provision of new and replacement housing shall be promoted and encouraged to meet needs and provide choice in all housing sectors which cannot be satisfied by the optimum use of existing housing.
- 7.11 Policy H7 Housing Land Provision made provision for the required levels of housing during the plan period up to 2011 however the policy has not been saved by the Secretary of State and no longer forms part of the UDP. The decision not to extend the policy was due to non-compliance with the then national planning policy statement 3 (PPS3) due to its significant reliance on windfall contributions to housing supply. Since the adoption of the UDP, the adoption of the West Midlands RSS in June 2004 set revised housing figures for the region and in October 2006 Coventry was specified as a growth point for housing above the then existing RSS requirement which further increased targets for housing over the period 2006-2016, as outlined earlier.
- 7.12 As outlined in Section 5 and 6 the local policies for housing supply and delivery in Coventry City are now out of date, given the time-expired plan and the absence of any up to date policies. There are no emerging policies which have been subject to formal examination by the Secretary of State, that can be given any weight at this time. The Council's 2012 Core Strategy was found not to have been prepared in accordance with the duty to cooperate and was subsequently withdrawn in April 2013.
- 7.13 Under these circumstances, the Council's position in relation to having a 5 year supply of housing land and being able to demonstrate compliance with paragraph 47 of the Framework is questionable, and, in accordance with paragraph 49, relevant policies for the supply of housing may not therefore be up to date.
- 7.14 Policy H9 of the CDP: *Windfall additions to housing supply* states that:

“Proposals for housing development on sites not identified in either policy H8 or in the City Council’s 1997 Unitary Development Plan Monitor will be permitted subject to:

- ***Compatibility with nearby uses;***
- ***The provision of an attractive residential environment;***
- ***Convenient pedestrian access to local facilities;***
- ***Being well served by public transport; and***
- ***Compatibility with other Plan policies.***

The release for development of greenfield sites exceeding 1 hectare will only be permitted if shown to be necessary to meet the dwelling requirement for the following five years.”

7.15 The application site is clearly a greenfield site exceeding 1 hectare in area and therefore falls under the bracket of the second part of the policy above. In the circumstances of future housing supply as examined above, we believe that the site should be considered positively as a much needed windfall addition to housing supply. The supporting information forming the planning application demonstrates accordance with each of the above bullet points.

7.16 Whilst Policy H9 is out of date in terms of its application to deliver housing for the city, and restriction on sites above 1 hectare, the development proposals nevertheless comply with its aims.

Affordable housing

7.17 Policy H10 sets out requirements for affordable housing and states that the development of specific sites and sites of 1 or more hectares or of 25 or more dwellings, will be conditional upon negotiation of an appropriate element of affordable housing. The policy states an element comprising of at least 25% of the proposed number of dwellings normally being sought. The City Council adopted additional Supplementary Planning Guidance on affordable housing in February 2006 which sets out detailed guidance on the provision of affordable housing including required tenure splits of such housing and the split of house types.

7.18 The planning application is outline at this stage, with full details of affordable housing scheme to be agreed and provided through the subsequent reserved matters applications and through the Section 106 Agreement. It is envisaged that the s106 Agreement will set the framework for the future provision of affordable housing.

Design

7.19 Policy H12: *Design and density of housing development* requires the density of development to represent the most efficient use of sites. The design elements of the development and the assessment of quality will be considered on the basis of the following:

- Existing site features;
- The relationship between buildings and spaces;
- Building details – proportion, massing and materials;
- Convenient and safe pedestrian and cycle access;
- An appropriate level of car parking;
- Durable landscaping treatment;
- Efficient use of energy; and
- Enhancement of the character and quality of the local environment.

7.20 At this stage the detail on the outline application and illustrative Masterplan shows a maximum level of housing and general disposition of uses. The detailed provisions of policy H12 are aimed principally at detailed applications and are therefore not applicable at this stage given the level of detail. However subsequent reserved matters applications will need to comply with the above policy. The full design credentials of the development are examined in the accompanying DAS and the illustrative Masterplan.

Access and movement

7.21 Chapter 2 of the CDP sets out the policy aim for transportation within the city and seeks to improve accessibility for the whole community and promote new or improved means of transport, walking and cycling so as to reduce the reliance on the use of the private car. Policy AM1 sets out transport measures to include an integrated, accessible and sustainable transport strategy.

- 7.22 Policy AM3 states that major new developments and highway schemes must facilitate the provision of safe, convenient and efficient bus services, with developers expected to include or fund physical works, and in most cases, contribute to enhanced bus services. The proposed development is capable of accommodating an extension to existing bus services and this is a matter for further discussion with consultees in the context of planning obligations. The Transport Assessment fully considers the site's accessibility to public transport and what new public transport is considered appropriate.
- 7.23 Policy AM9 concerns pedestrians in new developments and states that convenient routes must be incorporated in the design of new developments. Similarly policies AM11 and AM12 reiterate similar requirements for cycling along with the provision of enhanced facilities for cycle parking to promote the use of this mode of transport. The proposals incorporate dedicated pedestrian and cycle routes through the various open spaces within the development, as shown on the movement and access plan within the DAS. Further measures to encourage cycle and pedestrian access to the site are included with the accompanying TA. It is clearly demonstrated that there is provision to facilitate the use of alternative transport modes to and from the site, in accordance with the above policies.
- 7.24 Policy AM10 requires developers to incorporate or fund traffic calming measures associated with development where road safety or environmental quality may be affected. The TA has undertaken a thorough analysis of the likely impact on the surrounding road network and identified what improvements will be required. These can be delivered via conditions or s106 agreement.
- 7.25 Policy AM22 deals with road safety in new developments and requires safe and appropriate access to the highway together with on-site arrangements for vehicle manoeuvring. The outline application seeks full approval of the access positions into the site and full consideration has been to this policy in the TA.
- 7.26 Policy AM17 deals with car parking and states that levels must ensure that developments do not cause parking problems in the vicinity. Detailed approval of parking provision is not sought through the outline application at this stage. Reserved matters applications will establish parking provision on site in accordance with prevailing local and national parking policies.

8. CONCLUSIONS

8.1 The site is located within the Green Belt. Strict policy restrictions are placed on new development in the Green Belt and the proposal does not constitute a form of development that would be considered appropriate. As a consequence it is necessary to demonstrate very special circumstances before development could be justified.

8.2 In this case there are clear benefits associated with the proposal which cumulatively provide the necessary very special circumstances. In summary these are:

- The Council in preparing the 2009 Core Strategy identified the Keresley area as suitable for a development of 3,600 dwellings. This included the application site. This approach was endorsed by the Inspector undertaking the Examination into the Plan. Consequently the principle of utilising the site for housing development has been considered and found to be appropriate in order to meet the housing requirements of the City.
- The Council's later approach in the 2012 Core Strategy was found not to have met with its legal obligations to cooperate with neighbouring authorities. The second Core Strategy also aimed to reduce the housing requirement.
- It is now evident from the Council's jointly produced SHMA that the housing need in Coventry is likely to be closer to that established in the 2009 Core Strategy than the repressed housing requirement set out in the 2012 Core Strategy. In order to meet this need it is evident that some Green Belt release will be necessary.
- The application site represents an area of Green Belt land which was a small part of the larger Keresley proposal found to be sound by an Inspector. It is located closest to the existing urban edge of the City. It therefore represents the most sustainable portion of the wider Keresley Eco-Suburb proposal set out in the 2009 Core Strategy and is the most suitable to come forward as a first phase of development.
- It is evident that the proposal is required in order to meet with the Council's own housing needs expressed in the SHMA. The site

represents the most suitable location for the delivery of new housing to meet these needs, being free of any significant physical constraints.

- The site does not conflict with any of the five purposes of including land within the Green Belt and has been found to be suitable for Green Belt release by the first examining Inspector.
- It was also found that development of the wider site would not adversely affect significant parts of the Green Belt such as the Meridan Gap.
- In addition to the above the proposal will have its own significant benefits in economic, social and environmental terms. This includes the provision of new public open space, new community and education facilities, new wildlife sites and improved pedestrian and cycle links.
- In addition the proposal will deliver significant recreational benefits to the wider community through the refurbishment of the President Kennedy Swimming Pool. This can be secured via a Section 106 Agreement.
- In combination the above provide the very special circumstances necessary to depart from the normal restrictions placed on development in the Green Belt.

8.3 The proposal has also been assessed against the wider objectives of the NPPF. This has demonstrated that the development will deliver economic, social and environmental benefits. The proposal will promote sustainable travel through the provision of new local facilities, including a local convenience store and primary school, these will also be linked in an integrated way into new housing areas to provide the opportunities to utilise walking and cycling rather than the private car.

8.4 The application has been supported with a detailed Illustrative Masterplan and Design and Access Statement. This sets out how the proposal will delivery good quality design and high quality residential environments. It is consistent with the aims and objectives of the NPPF.

8.5 The proposal will promote healthy communities in providing new recreation facilities within the areas of public open space, improved recreation facilities for sport at the President Kennedy School and potentially new facilities as part of the local centre.

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- 8.6 The proposal has also been assessed against the requirements of the existing Coventry Development Plan. It has been established that the proposal will be compatible with the aims and objectives of Policy H9 which seeks to control windfall housing development within the City.
- 8.7 The proposal will deliver affordable housing based on the Council's requirement of 25% of the total numbers of units.
- 8.8 The proposal will deliver an efficient and effective use of land having to meet the needs for housing within the City in an environmentally sensitive way which provides clear benefits in terms of an integrate and comprehensive approach to new development.
- 8.9 The proposal has been through a detailed Environmental Impact Assessment which has established that the environmental implications of the proposal will be acceptable provided that suitable mitigation is provided. The Environmental Statement sets out in detail all the supporting reports including the Transport Assessment, Flood Risk Assessment and Ecology Report. These all demonstrate that the proposal is acceptable in planning terms and will not have any adverse implications for the surrounding area.
- 8.8 Overall the proposal will deliver a new vibrant and environmentally sensitive residential community, meeting the needs of the City in the short term without compromising wider planning objectives including the key objectives of the Green Belt. As a consequence the proposal meets with the overarching requirement of securing sustainable development and merits planning permission.