

LAND OFF TAMWORTH ROAD, KERESLEY, COVENTRY

STATEMENT OF VERY SPECIAL CIRCUMSTANCES

ON BEHALF OF LIONCOURT HOMES

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

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1. VERY SPECIAL CIRCUMSTANCES – LAND OFF TAMWORTH ROAD, KERESLEY, COVENTRY

Introduction

- 1.1 The site the subject of the planning application is almost entirely located within the Green Belt, as defined in the Coventry Development Plan adopted on 9th December 2001. The determination of any planning application must therefore address Policy GE6 of the adopted Coventry Development Plan which states inappropriate development will not be allowed in the Green Belt unless justified by very special circumstances.
- 1.2 More recent policy is contained within the NPPF. The NPPF reaffirms that the construction of new buildings is inappropriate in the Green Belt. The NPPF also 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.
- 1.3 In coming to a view as to whether very special circumstances exist, a number of Court judgements are of particular significance.
- 1.4 In the Court of Appeal decision *Wychavon District Council v Secretary of State for Communities & Local Government & Ors [2008] EWCA Civ 692 (2008)* it was held that the words 'very special' should not be interpreted as being 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 assessment as to the weight to be afforded to a particular factor. The Judge (Carnworth LJ) noted that it was incorrect to look for the unusual or uncommon when weighing considerations as a prerequisite for finding that very special circumstances exist.
- 1.5 This is consistent with a judgement of Sullivan J in *Basildon District Council, R (on the application of) v Temple (2004)* who 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 amounted to very special circumstances is a matter of planning judgement for the decision maker.

- 1.6 In *Herba Foods Limited v Secretary of State for Communities and Local Government and Anor (2008) EWHC 3046 (Admin)*, Sir George Newman outlined that whether very special circumstances exist is the ultimate issue to be determined, the final part of the process of decision making, and the critical question on the path to that determination is whether other considerations clearly outweigh the harm by reason of inappropriateness and any other harm. He further stated that the decision maker is obliged to give adequate consideration to circumstances, either individually or cumulatively, and to determine whether or not they clearly outweigh the harm and in so doing has to exercise a judgement and assess the quality of factors according to planning principles and considerations.
- 1.7 Furthermore, in the court of Appeal, in *St Albans City and District Council v Hunston Properties Limited and Secretary of State for Communities and Local Government [2013] EWCA Civ 1610*, Sir David Keene in giving the only substantive judgment stated:
- "21. In essence, the issue is the approach to be adopted as a matter of policy towards a proposal for housing development on a Green Belt site where the housing requirements for the relevant area have not yet been established by the adoption of a Local Plan produced in accordance with the policies in the Framework. Such development is clearly inappropriate development in the Green Belt and should only be granted planning permission if "very special circumstances" can be demonstrated. That remains government policy: para.87 of the Framework. In principle, a shortage of housing land when compared to the needs of an area is capable of amounting to very special circumstances. None of these propositions is in dispute."*
- 1.8 A consistent theme of the above is that, whilst what can constitute very special circumstances is a matter for the Courts, ultimately the determination as to whether very special circumstances exist is a matter of planning judgement by the decision maker. The weight to give to the various elements identified which either individually or cumulatively are considered to constitute very special circumstances is a matter of planning judgement and must be weighed against the Green Belt harm of inappropriateness, and any other harm that may exist. It is also, of course, of particular relevance that in national and local policy significant weight is to be afforded to the protection of the Green Belt.
- 1.9 Provided a decision maker properly understands and applies local and national planning policy, it is unlikely that the courts would intervene in a weighing exercise as planning judgement is a matter for the decision maker and not the

courts. This is the context for the consideration of very special circumstances by members of the Planning Committee in determining the current application in Keresley.

- 1.10 This statement firstly reviews the harm to the Green Belt by virtue of loss of openness and the purposes of including land in the Green Belt, as set out in the NPPF.
- 1.11 The statement also draws together the material considerations in relation to the proposed development at Keresley which can outweigh the harm to the Green Belt by virtue of inappropriateness, and any other harm, as set out in national and local policy, and therefore demonstrate that very special circumstances exist. The very special circumstances derive from of a number of considerations which in combination provide the necessary support to outweigh the normal application of Green Belt policy. The following statement considers the urgent need to address deficiencies in the housing mix, quantity and quality of dwelling provision within the City of Coventry. In particular it goes on to consider the need to provide for new homes in locations able to meet identified requirements for existing and new residents. The most recent information relating to this matter is contained in the Coventry and Warwickshire Joint Strategic Housing Market Assessment.
- 1.12 The statement further considers the context of the very protracted delay in bringing forward new development through the development plan process in the City and how this has, and will continue to have, an adverse impact on the economic prospects for Coventry. In particular it is evident that the absence of a local plan, bearing in mind that the previous Local Plan expired in 2011, has already adversely affect the ability of Coventry to provide sufficient housing to meet its needs and in particular to provide a range of suitable housing of the right sort in a range of locations and environmental circumstances so as to provide for distinct housing market requirements. This has also impacted upon the economic prospects for the City of Coventry as a consequence of the continued movement out of the City of residents who can afford so to do.

2. IMPACT ON THE GREEN BELT

- 2.1 In considering the role that the Keresley site plays in meeting the five purposes that Green Belt serves as set out in the NPPF, and the impact the proposed development would have, previous Green Belt studies prepared to support development plan preparation and the Landscape and Visual chapter of the Environmental Statement associated with the current planning application are of note. In particular in terms of the Landscape and Visual Assessment it is notable that the site is contained within a relatively tight visual envelope. The assessment identified that the proposal would result in some change but that would be set within the attributes of the receiving landscape. The site is clearly in proximity to the existing settlement edge of both Keresley to the north and Coventry to the east. With mitigation and through the use of a landscape strategy, this will ensure that development proposals are acceptable in landscape and visual terms.
- 2.2 New areas of green infrastructure which are shown within the Illustrative Masterplan will provide a structured landscape setting that will assist in reducing the likely visual effects of development overtime and deliver a multi-functional network of open spaces with enhanced opportunities for public recreation.
- 2.3 It is clear from the Landscape and Visual analysis of the site that the proposal can be assimilated within the landscape and does not cause harm to three of the purposes of including land within the Green Belt, namely; checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns. In addition, the evidence below concerning the economic benefits of the proposal which can support growth of the City clearly indicates that on balance the proposal would assist in the regeneration of Coventry and not cause harm to the purpose of encouraging the recycling of derelict and other urban land. The harm to the Green Belt is the loss of openness and the encroachment into the countryside. Furthermore, the planning application in its careful assessment of the proposal in terms of landscape has also demonstrated that the impact on the Green Belt can be adequately mitigated, so that any harm to the Green Belt is limited.

3. BACKGROUND – THE STRATEGIC HOUSING MARKET ASSESSMENT

- 3.1 The local authorities in Coventry and Warwickshire commissioned the preparation of a Joint Strategic Housing Market Assessment (SHMA) for their functional housing market area. The Joint SHMA was produced by GL Hearn and Justin Gardner Consulting in 2013.
- 3.2 The Joint SHMA is concerned principally with issues related to housing development, and considers particular questions relating to:
- How many homes might need to be developed in the future;
 - What mix of homes might be needed;
 - The housing needs of specific groups within the population.
- 3.3 Coventry forms part of a sub-regional housing market, which extends south to include Warwick, Leamington Spa and Southam; east to Rugby and north to Nuneaton and Bedworth.
- 3.4 The SHMA notes in particular that Coventry acts as the key population and employment centre within the sub-regional housing market. It has a young population structure and attracts people into the sub-region, with net out-migration, particularly of family households, from the City to surrounding areas. There is net in-commuting into Coventry, particularly of those in higher-paid occupations.
- 3.5 The brief overview below looks at housing tenure and housing stock within Coventry.

Housing Stock and Tenure

- 3.6 An analysis has been undertaken of the information in the SHMA along with other sources such as the 2011 census. This has sought to present a clear understanding of the existing housing stock in the City.
- 3.7 The following Tables 1 and 2 illustrate the position of Coventry relative to the sub region, West Midlands and national picture.

Table 1: Detailed Tenure Profile 2011 (%)

	Owner Occupied	Shared Ownership	Social Rented	Private Rented	Other
Coventry	60.6%	0.6%	17.0%	20.6%	1.2%
North Warwickshire	72.4%	0.7%	14.4%	11.3%	1.2%
Nuneaton and Bedworth	71.4%	0.5%	14.5%	12.7%	1.0%
Rugby	69.5%	1.0%	14.3%	14.1%	1.2%
Stratford-on-Avon	71.8%	1.1%	12.9%	12.7%	1.5%
Warwick	66.7%	0.9%	13.4%	17.9%	1.2%
HMA	66.7%	0.7%	15.0%	16.4%	1.2%
West Midlands	64.9%	0.7%	19.0%	14.0%	1.5%
England	63.3%	0.8%	17.7%	16.8%	1.3%

Source: Census (2011)

(GL Hearn Joint Coventry and Warwickshire SHMA 2013)

Table 2: Dwelling Stock across the Local Authorities (%)

% Dwellings	Detached	Semi-detached	Terraced	Flat/Maisonette	Other
Coventry	10.3	27.5	43.0	19.0	0.2
North Warwickshire	28.3	39.1	23.5	8.6	0.5
Nuneaton and Bedworth	23.5	37.4	26.1	12.5	0.4
Rugby	28.3	33.5	24.9	13.0	0.4
Stratford-on-Avon	36.8	30.3	19.4	11.7	1.9
Warwick	24.3	30.9	21.5	23.1	0.2
HMA	21.8	31.5	30.2	16.3	0.5
West Midlands	23.7	36.8	22.9	16.2	0.4
England	22.3	30.7	24.5	22.1	0.4

Source: Census (2011)

(GL Hearn Joint Coventry and Warwickshire SHMA 2013)

3.8 The degree of focus on smaller properties in Coventry suggests a significant imbalance within its housing stock and a need to diversify this. Just 10.3% of the housing stock is detached, whilst there is a high proportion of one and two-bed properties at 36.4%.

3.9 Table 3 below is based on the 2011 census and provide a further example of the polarisation of the housing stock in Coventry within the smaller unit types.

Table 3: Size of Homes by Local Authority (%)

% Dwellings	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 or more bedrooms
Coventry	9.7	26.7	49.9	10.2	3.1
North Warwickshire	6.7	23.3	50.6	15.3	3.9
Nuneaton and Bedworth	7.6	25.3	51.3	13.3	2.3
Rugby	8.2	25.0	44.0	17.4	5.3
Stratford-on-Avon	6.7	25.5	37.9	21.5	8.2
Warwick	10.3	27.8	37.1	17.7	6.8
HMA	8.6	26.1	45.7	14.7	4.6

Source: Census (2011)

3.10 The issue of the existing housing stock in Coventry and what would be a suitable response formed part of the analysis of the Joint SHMA as set out in the extract below.

'In Coventry there is a strategic case for provision of larger family homes with three or more bedrooms to help diversify the City's housing offer, reduce overcrowding and support regeneration through growing the spending power within its catchment area. There is significant under-provision of housing in Council Tax Bands E and above.'

(GL Hearn Joint Coventry and Warwickshire SHMA 2013)

3.11 Not surprisingly the domination of the existing housing stock within the smaller unit types and in terraced/flatted formats has implications for the value of the homes. Table 4 below sets out a comparison of Coventry and other districts in the sub region in relation to Council Tax bands.

Table 4: Percentage of Dwelling Stock by Council Tax Band at Local Authority Level, 2011

	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Coventry	41.2%	29.9%	16.4%	6.4%	3.3%	1.6%	1.0%	0.1%
North Warwickshire	24%	25.5%	21.6%	13.8%	7.9%	4.4%	2.5%	0.3%
Nuneaton and Bedworth	37.0%	23.0%	22.1%	12.5%	4.1%	1.0%	0.3%	0.0%
Rugby	19.0%	25.4%	23.8%	12.9%	9.3%	5.8%	3.4%	0.2%
Stratford-on-Avon	6.0%	13.7%	28.3%	16.8%	15.9%	9.2%	8.7%	1.5%
Warwick	7.7%	18.5%	27.3%	20.3%	11.2%	8.0%	6.3%	0.7%
HMA	26.3%	23.9%	21.9%	12.3%	7.5%	4.4%	3.3%	0.4%

Source: VOA/ONS

(GL Hearn Joint Coventry and Warwickshire SHMA 2013)

3.12 The summary below provides further extracts from the GL Hearn 2013 Joint Coventry and Warwickshire SHMA (November 2013).

'Coventry has a relatively 'narrow' housing offer, with a focus on smaller and cheaper properties. 71% of homes are in Council Tax Bands A and B, which is 20% above the regional average with flats and terraced homes making up 62% of the housing stock.'

'It also has the highest level of private renting of authorities within the HMA at 20.6% which is above regional and national averages, with the level of owner occupation below average at 60.6%. The number of owner occupying households fell in Coventry over 2001-11, with a reduction of almost 6,000 households.'

‘The needs profile, based on the demographic modelling carried out by GL Hearn, shows a need in particular for 3-bed homes. The level of need for 4 + bed properties is also greater than in North Warwickshire and Nuneaton and Bedworth, but is not as high as in the more affluent Stratford-on-Avon or Warwick District.’

3.13 The above demonstrates that Coventry has an existing housing stock which is dominated by smaller and cheaper properties. Clearly the level of private renting is higher than the regional and national average with owner occupation below average. These deficiencies clearly need to be addressed if the reduction in owner occupation noted in the period 2001-11 is to be reversed, in particular to support the aspirations for economic growth in the City including the City centre.

3.14 The SHMA went on to consider the market housing needed by each local authority over the period 2011-2031. This coincides with that which will be addressed in the new Coventry Local Plan. The SHMA has modelled the market housing needed by each local planning authority up to 2001 and defined this by unit sizes. Table 5 below sets out the housing need by unit type for the Plan period. It is evident that in Coventry the overwhelming need at 54.3% is for 3 bedroom accommodation. There is also a substantial need, considerably in excess of its neighbours in North Warwickshire and Nuneaton and Bedworth, for accommodation in the 4+ bedroom category.

Table 5: Modelled Market Housing Needed by Local Authority 2011 to 2031

Area	1 bedroom	2 bedrooms	3 bedrooms	4+ bedroom
Coventry	5.2%	27.4%	54.3%	13.1%
North Warwickshire	6.3%	34.3%	52.4%	6.9%
Nuneaton and Bedworth	4.7%	33.1%	53.3%	8.9%
Rugby	5.4%	26.4%	46.3%	21.8%
Stratford-on-Avon	6.8%	33.4%	42.7%	17.1%
Warwick	5.9%	29.4%	41.1%	23.7%
HMA	5.6%	29.5%	48.5%	16.4%

*Source: Housing Market Model
 (GL Hearn Joint Coventry and Warwickshire SHMA 2013)*

3.15 The Joint SHMA comments below on the associated benefits of moving towards a more diverse housing stock. In particular, the SHMA notes that the provision of larger homes in the north west of the City (e.g. Keresley) will have particular benefits associated with reducing pressure on the ‘overheated’ south sub-market area of the City. The Joint SHMA also emphasises the regeneration benefits of attracting/keeping higher paid workers to the City to reduce commuting and increase the spending power in Coventry. The SHMA states:

'Furthermore there are potential regeneration benefits from diversifying the housing offer through delivery of larger homes which attract higher skilled/paid workers to live in the City rather than commute in, thus further increasing spending power.'

'The provision of larger homes will limit potential 'overheating' in the Higher Value South sub-market within Coventry where a greater proportion of mid-market family housing are located, with more semi-detached properties and homes in Council Tax Bands C or above. The opportunities to do this might be in the more suburban locations within the City, such as in the north-west. If this is not feasible, demand will be displaced to surrounding areas.'

3.16 The SHMA is clear that there is an evident and clear need to attract and retain higher skilled/paid workers and a rebalancing of the housing stock is needed to achieve this. Furthermore it notes that if this is not feasible then there will be the potential for this demand to be met in surrounding areas. This will have implications for the economic conditions of the City, in particular the City centre, and add to commuting.

Overcrowding

3.17 The SHMA identifies that Coventry also has the highest level of over-crowding in the HMA at 5.6%, which is above the sub region, region and national average. The high level of over-crowding in Coventry is partly a reflection of the City's housing offer, which is focused more towards terraced housing and flats; as well as its younger population profile and higher proportion of students. Nonetheless it also points to the need to diversify the City's housing offer through increased delivery of larger homes. It also suggests that some particular needs of the community such as those groups who tend to require larger homes to be able to provide for extended families are not being met resulting in overcrowding. This is a particular failing of the existing housing stock which could be addressed through new development.

Table 6: Overcrowding 2011

	Overcrowded Households	% Overcrowded
Coventry	7,246	5.6%
North Warwickshire	685	2.7%
Nuneaton and Bedworth	1,507	2.9%
Rugby	1,019	2.4%
Stratford-on-Avon	904	1.7%
Warwick	1,789	3.0%
HMA	13,150	3.7%
West Midlands	105,814	4.6%
England	1,060,967	4.8%

*Source: Housing Market Model
(GL Hearn Joint Coventry and Warwickshire SHMA 2013)*

Conclusions on Housing Mix and Quality

- 3.18 It is evident from the above that the City of Coventry has an extremely polarised housing stock which in particular is dominated by properties falling within smaller and cheaper formats. 71% of homes are within Council Tax Band A and B, which is 20% above the regional average, and this is a significant factor which impacts upon the City's ability to provide accommodation for a range of socio-economic groups. The format of homes within the City is also polarised within terraced and flatted formats, which amounts to 62% of the total housing stock.
- 3.19 In terms of tenure it is evident the City has the highest level of private renting within the housing market area, which is also above national and regional averages. The level of owner occupation is below average at 60.6% of the total. Also of significance is the fact that the number of owner occupying households within Coventry fell over the period 2001-2011, with a reduction of almost 6,000 households. This is clearly a very significant factor which must be addressed if the City is not to become further polarised with housing being within either private rented or social rented tenures.
- 3.20 The limited ability of the City to meet the needs of those requiring larger homes within higher council tax band brackets has resulted in overheating in the higher value south sub-market where the greater proportion of mid market family homes are located. The Joint SHLAA makes explicit reference to this scenario and indicates that development of new homes able to meet with market demand in areas such as the northwest of Coventry (e.g. Keresley) may address this factor. If this is not capable of being accommodated then demand will displace to surrounding areas outside of the city boundary.
- 3.21 The above scenario has significant and serious implications for the City as a whole including its economic base. It is evident that owner occupation within the city has reduced over recent times. It is also evident that there is a continued drift of residents within higher value/skilled jobs to locate outside of the City boundary as they are unable to obtain satisfactory accommodation which would meet their needs. This scenario is on-going and will only result in the polarisation of the city within certain socio-economic groups which have less

spending power and this in turn can only impact upon the overall economic circumstances prevailing within Coventry including the health of the city centre.

- 3.22 A further factor which is clear is that Coventry suffers with a significant degree of overcrowding. This is likely to be particularly apparent amongst certain groups within the community such as those where there remains a desire to live within extended family groups. The limited amount of accommodation within the city within larger properties particularly impacts upon the ability of these groups to meet their housing requirements. This is a further deficiency in the existing housing stock resulting in adverse consequences through overcrowding.
- 3.23 In view of the above it is clear that the City's existing housing stock is not meeting the needs of its population. This is resulting in a drift of certain socio-economic groups out of the city into the surrounding area. It also results in the overheating of the market in the higher value southern submarket within Coventry where the greatest proportions of midmarket family houses are located. The failure to meet housing needs has also led to an increase in overcrowding within the existing housing stock. These factors also contribute towards adverse consequences for the economy within the City as a result of an overall reduction in spending power and in particular the fact that the city centre will not compete with its neighbours as expenditure is diverted to other centres which are in more accessible locations relative to the chosen destinations of those who leave the city.

4. LOCAL PLAN PROCESS

- 4.1 The City Council's current Development Plan consists of the Coventry Plan (2001-2011). The policies and proposals in the Plan relating to housing provision expired in 2011. The majority of housing sites within it were concentrated on previously developed land within the City boundary.
- 4.2 In order to plan for future growth of Coventry the City Council began to produce a series of planning documents underpinned by a substantial evidence base.
- 4.3 The first Development Plan Document to be produced was the Coventry Core Strategy (2009), prepared over the preceding 2 years. This document, amongst other things, included a proposal for the Keresley 'Eco-Suburb' involving the development of the area for around 3,600 homes. The land subject to the current planning application fell entirely within the Keresley Eco-Suburb proposal. The whole of the Eco-Suburb included land that was located in the Green Belt.
- 4.4 The 2009 Core Strategy reached the Examination stage. The Inspector undertaking the Examination endorsed the Keresley Eco-Suburb proposal and confirmed that the area should be removed from the Green Belt and identified as land suitable for housing development of 3,600 homes and a country park. In doing so he carefully considered a comprehensive and detailed series of reports and assessments, including a Green Belt Review, and evaluated the relative merits of the scheme compared to other sites. As a consequence of this it is evident that the removal of the land from the Green Belt and its allocation for housing development has already been independently assessed by a Planning Inspector and endorsed as a suitable form of development to meet the housing needs arising within Coventry. In so doing the Inspector was cognisant of the location in the Green Belt and the need to demonstrate exceptional circumstances. This is a very significant factor.
- 4.5 However the 2009 Core Strategy was abruptly abandoned following the Council elections in 2010 which resulted in a change in the administration of the Council.
- 4.6 Subsequently, a further Core Strategy (the 2012 Core Strategy) was prepared. This sought to justify a reduction in the housing requirement based on provision through redevelopment of brownfield sites only so as to avoid the need to identify any greenfield sites or land within the Green Belt for housing. This

reached the first stages of Examination but was withdrawn by the City Council following the initial findings of the Inspector in March 2013 that the Council had failed in its duty to cooperate with neighbouring local authorities.

4.7 Since March 2013 the Council has embarked on the preparation of a further Development Plan. The latest proposal consists of the new Coventry Local Development Plan (2013-2031). This was published in 2014 and identified three options. Two of the options concluded that it was necessary for Coventry to develop on land within the Green Belt if it was to meet its housing requirement. The Joint SHMA was prepared to form part of the evidence base of the latest Plan. The emerging Plan has identified that the minimum housing requirement over the period 2011-2031 of 23,600 dwellings.

4.8 The new Coventry Local Development Plan also reflects that the delivery of new housing identified in the joint SHMA would represent a step change for Coventry in terms of housing delivery. By way of comparison it can be seen as follows:

1951 – 1955	Average homes built per year	2,150
1981 – 1985	Average homes built per year	795
1991 – 1995	Average homes built per year	509
2001 – 2005	Average homes built per year	468
2009 – 2013	Average homes built per year	759

4.9 To meet the housing requirement set out in the Plan would require 1,180 homes per annum to be built per year. If sites are located in desirable areas, this increased delivery can be achieved, and represents a commitment from the Council to see the City grow and regain its position as a top-ten City in England.

4.10 The Coventry draft SHLAA 2014 which forms a key part of the evidence base of the new Local Plan, has identified that approximately 16,500 new homes can be accommodated within or adjacent to the existing urban area. This does not include any sites currently within the Green Belt other than those that have permission. The SHLAA also identifies land within the Green Belt that could be suitable for between 6,000 – 7,100 homes and this includes the Keresley site.

4.11 The draft SHLAA 2014 identifies that between 2011 – 2031 of the 16,500 new homes identified, around 80% would be on brownfield sites. Like many other substantial urban areas, Coventry has been subject to considerable development of brownfield land over the last 15 years and whilst some sites remain, these tend to be the sites that have greatest constraints which inhibit their delivery.

These also can include land most suitable for other uses such as employment or retailing or with active existing economic uses.

- 4.12 When considering the three scenarios specified in the New Coventry Local Plan it is noted that Scenario 3, which incorporates development of land within the City's boundaries, Green Belt release and additional land provided in adjacent districts, that such an approach will promote choice and opportunity within the housing market and in all parts of the city. It will also allow some diversification of the City's housing stock over the course of the plan period. Providing a flexible and varied housing land supply would also reduce pressure on urban employment sites to be converted to housing thus helping to retain employers and jobs within the city. Finally it adds that a varied and flexible supply of housing land presents the opportunity to build larger, higher value homes that are attractive to new businesses and inward investment.¹
- 4.13 It is clear from the above that the issues set out in the City Council's latest Development Plan Document reflect those difficulties set out in the housing market evidence referred to above. In particular, it is readily apparent that the City must provide greater choice and opportunity within the housing market. It must also deliver diversification of the existing housing stock which can provide a flexible and varied housing land supply. It also notes that the opportunity to build larger, higher value homes represents an opportunity to attract new business and inward investment.
- 4.14 Of particular note as set out above is the need to provide a step change in housing delivery within the city. If it is to meet even the minimum requirement set out in the Coventry Local Development Plan, which is a reduced requirement relative to projections based on the latest ONS data, it will require a significant increase in house building. For the most recent period where data is available (2009-2013) the average number of homes built per year within the City amounted to 759 dwellings. This will need to increase to 1180 dwellings per years. This step change in housing delivery would, in the absence of new greenfield/Green Belt sites, have to be accommodated on previously developed land which the City Council itself acknowledges is likely to be constrained or in viable alternative use. It is very doubtful that the significant increase in

¹ Page 21 of the New Coventry Local Development Plan (2011-2031) September 2014

housebuilding necessary to meet the needs of Coventry could be achieved without utilising land beyond the existing built up area.

- 4.15 Progress towards adopting a development plan for Coventry has been unusually protracted having taken at least 8 years to reach this point in time. This is despite the fact that the issues in relation to the delivery of new housing which must be addressed have been identified for a long time. The need to address housing market deficiencies is long-standing and urgent.
- 4.16 The Keresley site clearly has already been identified and thoroughly, independently examined in the 2009 Core Strategy process and it has been demonstrated as suitable to meet strategic housing requirements. Exceptional circumstances have been found to exist to warrant the release of land from the Green Belt sufficient to allow for the development of 3,600 dwellings. The Keresley site is the only option currently available to bring forward now which can not only deliver the diversification in housing stock needed, but also enable the substantial increase in housing delivery across the City. Because of delays to the process of identifying new sites for development through the development plan process, the urgent need to release the site now is a very material consideration.

5. OTHER CONSIDERATIONS

- 5.1 The proposal will also deliver a wide range of other benefits. Of these of particular note is a very substantial contribution of £1.7 million towards the refurbishment/rebuilding of the President Kennedy School swimming pool. The existing swimming pool at President Kennedy School constitutes an 18m pool along with changing facilities. The pool has closed in recent times as it requires substantial improvements to meet contemporary standards. The pool is located within the north east sub-area of the City as defined in the Council's Sports Strategy for Coventry City. Within this document it is concluded that the quality of the swimming facility at President Kennedy School is 'poor'. Other swimming facilities within the vicinity include the Foleshill Sports and Leisure Centre (now reprovided at the AT7 Centre), approximately 3.5 km to the southeast which also achieved a 'poor' quality score and the Foxford Leisure Centre approximately 3.5 km to the west, which was the only pool to achieve a 'very poor' quality score. In view of the above it is evident that within the north of the City, the area where the site of the Keresley planning application is located, there is no easy access to a 'good' quality swimming facility.
- 5.2 The Council's assessment also models the closure of swimming facilities at President Kennedy and Ernesford Grange Schools. The modelling demonstrates that as a consequence of the closure of these two pools the resultant impact would be that all but four pools in the City would run at 100% capacity and one of the four remaining pools would run at 95% capacity. Consequently the assessment demonstrates that the closure of the President Kennedy swimming facility, which would continue without input from the current Keresley planning application, would put significant pressure on the remaining pools within Coventry.
- 5.3 It is particularly notable that whilst the President Kennedy School will be rebuilt through the National Priority School Capital programme, this programme does not provide for the rebuilding or refurbishment of the existing swimming pool facility. Without capital input from other sources the rebuilding/refurbishment of the swimming pool will not occur.
- 5.4 Lioncourt Homes has indicated that they are willing to contribute £1.7 million to the refurbishment of the current swimming pool at President Kennedy School. This would result in a good quality pool space with significantly enhanced

changing facilities to accommodate all users. It would also result in improved provision in a location capable of meeting existing residents needs within both the northeast subarea but also the northwest subarea. This considerable contribution towards enhancing the swimming pools facilities would come with a Community Use Agreement. Currently the swimming pool whilst used by the public, is not subject to any formal community use agreement. The proposal at Keresley will deliver not only the refurbishment of the pool but also ensure that a Community Use Agreement was in place which would formalise the public's right to use the facility.

- 5.5 The proposal will facilitate the reopening of the swimming pool facility, its refurbishment through a contribution of £1.7 million worth of investment and deliver a formalised arrangement to ensure the public can utilise the pool. This approach has been confirmed by the City Council as being consistent with its Sports Strategy for Coventry document, the Indoor Facilities Strategy and the Coventry Aquatics Strategy. The contribution is therefore one which it is appropriate for the applicant to provide through a s.106 agreement and accords with the CIL regulations.
- 5.6 In addition the refurbishment of the President Kennedy swimming pool will also compliment the provision of a 'sports hub' which is being developed at the school in association with its redevelopment. It is a further consideration that can only be met at the President Kennedy School site and not elsewhere and again would be consistent with the emerging policy approach of the City Council to delivering sports provision. The ability to focus contributions towards sports provision at this time in a facility which would provide for community use of a much needed, good quality swimming pool in this area of Coventry is an opportunity which arises in relation to the planning application.
- 5.7 The contribution to the refurbishment of the President Kennedy swimming pool is therefore a significant material consideration that must weigh in the planning judgment to be undertaken in establishing whether very special circumstances exist.

6 CONCLUSION

- 6.1 This Statement has reviewed the harm to the Green Belt, and set out considerations which demonstrate very special circumstances to warrant granting permission for the proposal. It includes an analysis of the prevailing circumstances relative to housing stock, housing need and associated economic implications, the delay in producing a development plan to address these issues, and other associated benefits directly linked to the planning application on land off Tamworth Road, Keresley.
- 6.2 Both Government policy and the Courts have established that in order to demonstrate very special circumstances a number of considerations can in combination outweigh the harm to the Green Belt by virtue of inappropriateness, and any other harm. It is clear that the proposal for land off Tamworth Road, Keresley does have a number of significant benefits associated with it which, it is our contention, in combination amount to very special circumstances. These are summarised below.
- 6.3 It is evident that the City of Coventry has a housing stock which is polarised within smaller unit types and lower price. 76.6% of the housing stock is within 2 and 3 bedroom formats. Only 13% of the overall dwellings available in the City constitute 4 bedrooms or more. A significant proportion (37.6%) is within the social rented or privately rented sectors. It is also evident that the amount of owner occupation within the City has been reducing over the period 2001-2011. These matters have already been highlighted through independent consultant reports which form the SHMA. The Council has also acknowledged that these matters need to be addressed as a matter of urgency in their most recent Development Plan publication. In particular the SHMA makes particular comment that land to the northwest of the City, which includes the Keresley area, can meet help address these deficiencies and in particular the overheating of the southern submarket area within the City where the majority of larger/higher value homes are located.
- 6.4 It is also evident that to provide the type of accommodation that the City requires to provide a more balanced housing stock will require housing in different locations to that that has been developed in recent times where new housing has been predominately located on brownfield sites in existing areas of the City. This also points towards the need to develop non brownfield sites in

order to widen the range of high housing available. As the majority of greenfield sites within Coventry are also designated as Green Belt, this will inevitably require the release of Green Belt sites and this has been acknowledged by the City Council in the most recent Development Plan document.

- 6.5 It is also recognised both in the SHMA and in the Council's Development Plan that there needs to be a step change in the delivery of new housing. A minimum requirement of 1,180 homes per annum is required to meet the minimum requirements for Coventry. Without greenfield (and therefore Green Belt sites) the ability of the City to deliver this amount of housing is very doubtful. Failure to deliver housing at this level will only result in increased need/demand and greater propensity for certain socio economic groups to move out of the city.
- 6.6 In addition to the evident housing need issues associated with the current polarisation of the housing stock, there are resulting economic factors which also are of significance. These are acknowledged in the SHMA whereby concerns are raised over the economic impact of the continued drift of higher socio economic groups outside of the City boundaries will have on the economic base of the City itself. If certain socio economic groups cannot meet their needs within the City and relocate to settlements in the surrounding area there is a clear propensity for their expenditure to be directed to other centres as well. This is likely to have series negative connotations for areas of the City such as the City Centre and this is already acknowledged both in the SHMA and the emerging Coventry Development Plan.
- 6.7 The Keresley proposal, whilst it is within the Green Belt, has also been subject to detailed independent Examination through the 2009 Core Strategy process. The Inspector concluded that the site was suitable as a housing allocation and could be removed from the Green Belt. In order to come to this view the Inspector clearly took on board detailed site considerations and the role that the land played in providing a Green Belt function. His conclusion that the site could be developed without under-mining Green Belt purposes is clearly highly significant.
- 6.8 The very protracted delay in bringing forward new development through the development plan process in the City has, and will continue to have, an adverse impact on the economic prospects for Coventry. In particular it is evident that the absence of a local plan, bearing in mind that the previous Local Plan expired in 2011, has already adversely affect the ability of Coventry to provide sufficient

housing to meet its needs and in particular to provide a range of suitable housing of the right sort in a range of locations and environmental circumstances so as to provide for distinct housing market requirements. This has also impacted upon the economic prospects for the City of Coventry as a consequence of the continued movement out of the City of residents who can afford so to do.

- 6.9 In addition to the factors relating to housing need and whether the site fulfils a Green Belt function, which is set out above, there are other direct benefits associated with the proposal itself. In particular through working directly with President Kennedy School the proposed development will deliver £1.7 million worth of refurbishment of the existing swimming pool on the school premises. This pool has a significant role within the wider leisure provision in the north of the City. It represents a specific and tangible proposal which will have real benefits for the residents who live in close proximity to the development site. It is also consistent with the Leisure Strategies recently approved by the City Council and has been supported by Sport England. This significant specific benefit associated with the proposed development itself is a significant factor.
- 6.10 Taking together the above clearly provide support for the development of the Keresley site in the short term. Without it there remains the potential for both the housing needs of the City to be unfulfilled and the detrimental effect resulting from the closure of the President Kennedy swimming pool on leisure provision within the north of the City to continue. The Keresley planning application to deliver 800 homes will remedy both of these factors in the short term. There is no other site currently available capable of doing this.
- 6.11 In view of the above it is considered that the very special circumstances necessary to outweigh the general presumption against inappropriate development in the Green Belt prevail and the proposed development should be supported.