

<b>Planning Committee Report</b>	
<b>Planning Ref:</b>	PL/2025/0001987/OUT
<b>Site:</b>	Land adjacent 260a Hawkes Mill Lane, Coventry, CV5 9FJ
<b>Ward:</b>	Bablake
<b>Parish:</b>	Allesley
<b>Proposal:</b>	Outline planning application for the erection of two dwellings (all matters to be reserved, except for access) (Resubmission of OUT/2022/3157)
<b>Case Officer:</b>	Ayesha Saleem

## **INTRODUCTION**

This application is a resubmission of OUT/2022/3157, which was refused on 6th January 2023. The application was refused as it was considered to be inappropriate development within the Green Belt contrary to both the Coventry Local Plan 2017 and National Planning Policy Framework.

This application is in outline form with all matters reserved except for access. This application has been referred to planning committee as 5 letters of support have been received.

The adjacent site has had various consents to redevelop a former piggery site, with a total of four detached dwellings. The background of the applications is outlined below.

The most recent outline approval, OUT/2020/2762, was initially recommended for refusal and was refused by Planning Committee on 11<sup>th</sup> February 2021 but was granted on appeal on 31<sup>st</sup> July 2021 (appeal reference number APP/U4610/W/21/3269710). The proposal was an outline application to erect four dwellings with access, scale and layout considered. Two houses would be located to the east of the access road and two to the west. The two pairs of dwellings would be separated by around a 2m gap. The houses would each have a footprint of approximately 9m x 7.5m, making a total floor area of 252 square metres and a height of 9.6 metres.

A further application was submitted under planning reference PL/2025/0000555/FUL, as the outline application OUT/2020/2762 permission timing had lapsed. Therefore, the applicant submitted a full application for two of the proposed dwellings, which was granted.

## **RECOMMENDATION**

Planning Committee are recommended to refuse planning permission for the reasons set out within this report.

## **REASON FOR DECISION**

The application site lies within the Green Belt where strict policies of restraint apply. The development of the site for two houses will cause serious harm to the Green Belt and is inappropriate development within the Green Belt. The very special circumstances that have been put forward to justify the proposal do not outweigh the harm which would be caused by the proposal.

The application site is not considered to be in an accessible location, and inadequate measures have been proposed to make the site sustainable. The existing walking and cycling routes to nearby local facilities and amenities are not considered to be appropriate to support walking and cycling.

The proposed development would be contrary to Policies GB1, H3, AC1, AC4 and AC5 of the Coventry Local Plan 2017 and the aims and objectives of the National Planning Policy Framework and the principles of good design and well-designed places as set out within the National Design Guide.

### **SITE DESCRIPTION**

The application site is located within the Green Belt, accessed via a private access which is located between 244 and 248 Hawkes Mill Lane. 244 and 248 Hawkes Mill Lane are single storey dwellings. The site is currently grass land between new built dwellings to the west and Hogs End Farm to the east. The site is screened from the wider public to the point that one is not aware of the site when traversing Hawkes Mill Lane.

### **APPLICATION PROPOSAL**

The application has been submitted in outline form with only the means of access provided. All other matters relating to layout, scale, appearance, and landscaping are matters reserved for later consideration. An indicative plan has been submitted that shows two detached, two storey dwellings with parking to the front and amenity space to the rear. The existing garage for Hogs End Farm will be demolished to allow for the access and will be replaced to the side of Hogs End Farm.

### **PLANNING HISTORY**

The planning history for the application site is as follows:

<b>Application Number</b>	<b>Description of Development</b>	<b>Decision and Date</b>
OUT/2022/3157	Outline planning permission for the erection of two dwellings (all matters to be reserved, except for access)	Refused 6 <sup>th</sup> January 2023

The main historic planning applications on the adjacent site to the west are as follows:

<b>Application Number</b>	<b>Description of Development</b>	<b>Decision and Date</b>
OUT/2018/2653	Outline application for demolition of existing agricultural buildings and erection of two dwellings (Use Class C3) (all matters except access, scale and layout reserved)	Approved 27 <sup>th</sup> February 2019.
OUT/2019/1375	Demolition of existing buildings and erection of four dwellings	Refused 7 <sup>th</sup> August 2019 Appeal dismissed

	(Outline application with access, scale, layout and appearance to be considered)	
OUT/2020/0577	Demolition of existing buildings and erection of three dwellings (Outline application with access, scale and layout to be considered)	Approved 15th July 2020
OUT/2020/2762	Demolition of existing buildings and erection of four dwellings (Outline application with access, scale and layout to be considered)	Refused 11 <sup>th</sup> February 2021 and allowed at appeal 31 <sup>st</sup> July 2021
RM/2021/3791	Application for approval of reserved matters (appearance and landscaping) pursuant to permission OUT/2020/2762 (APP/U4610/W/21/3269710), granted on appeal, 31st July 2021 for the 'Demolition of existing buildings and erection of four dwellings (Outline application with access, scale and layout to be considered)'	Approved 4 <sup>th</sup> April 2022
PL/2025/0000555/FUL	Erection of two dwellings with associated development	Approved 26 <sup>th</sup> June 2025
PL/2025/0001175/FUL	Erection of double garage to existing approved house site	Refused 4 <sup>th</sup> August 2025 (Current appeal being considered)
PL/2025/0002380/FUL	Erection of outbuildings to the rear of the two dwellings approved under application ref: PL/2025/0001388/RVC	Refused 21/01/2026
PL/2026/0000082/FUL	Erection of detached dwelling with associated development (Plot 2 previously approved under reference OUT/2020/2762)	Pending Determination

## **POLICY**

### **National Policy Guidance**

National Planning Policy Framework (NPPF) December 2024.

The National Planning Practice Guidance (NPPG) adds further context to the NPPF and it is intended that the two documents are read together.

### **Local Policy Guidance**

The current local policy is provided within the Coventry Local Plan 2017, which was adopted by Coventry City Council on 6<sup>th</sup> December 2017. Relevant policy relating to this application is:

Policy DS1: Overall Development Needs

Policy DS3: Sustainable Development Policy  
Policy H3: Provision of New Housing  
Policy H4: Securing a Mix of Housing  
Policy H9: Residential Density  
Policy GB1: Green Belt and Local Green Space  
Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation  
Policy GE4: Tree Protection  
Policy DE1 Ensuring High Quality Design  
Policy AC1: Accessible Transport Network  
Policy AC2: Road Network  
Policy AC3: Demand Management  
Policy AC4: Walking and Cycling  
Policy EM1: Planning for Climate Change Adaptation  
Policy EM2: Building Standards  
Policy EM3 Renewable Energy Generation  
Policy EM5 Sustainable Drainage Systems (SuDS)

**Emerging Local Policy Guidance – Local Plan Review was submitted to the Planning Inspectorate on 9<sup>th</sup> September 2025 for examination**

The Local Plan review is currently at Examination. Relevant emerging policy relating to this application is:

Policy DS1: Overall Development Needs  
Policy DS3: Sustainable Development Policy  
Policy H3: Provision of New Housing  
Policy H4: Securing a Mix of Housing  
Policy H9: Residential Density  
Policy GB1: Green Belt and Local Green Space  
Policy GE3: Biodiversity, Geological, and Landscape Conservation  
Policy GE4: Tree Protection  
Policy DE1: Ensuring High Quality Design  
Policy DE2: Delivering High Quality Places  
Policy AC1: Accessible Transport Network  
Policy AC2: Road Network  
Policy AC3: Demand Management  
Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility  
Policy EM1: Planning for Climate Change Adaptation  
Policy EM4: Flood Risk Management  
Policy EM5: Sustainable Drainage Systems (SuDS)  
Policy EM11: Energy Infrastructure  
Policy EM13: Overheating in new buildings

**Supplementary Planning Guidance/ Documents (SPG/ SPD):**

SPG Design Guidelines for Development in Coventry's Ancient Arden  
SPD Design Guidelines for New Residential Development  
SPD Delivering a More Sustainable City  
SPD Coventry Connected  
SPD Air Quality

**CONSULTATION**

No objections have been received from:

- Environmental Protection (CCC)- subject to conditions in relation to a CMP (construction management plan) and Low Nox boilers and EV (electric vehicle) charging points.
- Ecology (CCC)- subject to conditions in relation to lighting, biodiversity features, and a LEMP (Landscape Ecological Management Plan)

Objections have been received from:

- Local Highway Authority (CCC)

### **Neighbour consultation**

Immediate neighbours and local councillors have been notified, and a site notice was displayed on the 20th of October 2025.

Six letters of objection have been received, raising the following material planning considerations:

- a) Increased traffic
- b) Concerns regarding suitability of access
- c) Parking provision concerns
- d) Loss of wildlife
- e) Loss of privacy to neighbours
- f) Overdevelopment
- g) Loss/ Impact upon Green Belt
- h) Increased noise concerns
- i) Lack of notification

Within the letters received the following non-material planning considerations were raised, these cannot be given due consideration in the planning process:

- j) Damage to existing property boundaries
- k) Concerns regarding to structural damage/ subsidence
- l) Loss of view

Five letters of support have been received, raising the following material planning considerations:

- m) The land is currently disused and vulnerable to people potentially using it for waste and or living on it.
- n) Improve and enhance the area

Any further comments received will be reported within late representations.

### **APPRAISAL**

The main issues in determining this application are principle of development, the impact upon the openness of the Green Belt and character, future residential environment, impact upon residential amenity, access and highway considerations, air quality and ecological impacts.

#### **Principle of Development**

The application site is located within Green Belt, which is, by definition, inappropriate development. Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist.

The Agent has submitted a planning statement with their suggested very special circumstances summarised below:

- Infilling a small gap- The situation from the previously refused application has changed in that the four houses permitted immediately to the west of the site are all under construction, with Plot 1 being finished and construction of Plots 3 and 4 being well advanced. A material start has also been made on Plot 2. The planning authority must therefore take these new houses into account when assessing whether the application site constitutes an acceptable infill plot.
- Built up frontage- The site adjoins built development on all sides, most particularly to the west, east and south. Taking account of the recently consented four dwelling schemes within the adjoining land to the west, the application proposal would result in a continuous built-up frontage of seven properties within the physical confines of Hawkes End. The indicative site plan shows that the two new houses would form part of a continuous built-up.
- Within the physical confines of a village- Although Hawkes End, and the adjacent larger village of Brownhill Green, do not have defined village or settlement boundaries, case law has determined that this is not necessary in order to conclude that a particular site lies within the physical confines of a village, and that a case-by-case approach is required. This issue was clarified in the case of Julian Wood v Secretary of State for Communities and Local Government and Gravesham Borough Council (2015). The Court of Appeal held that sites outside designated village boundaries could still be considered as constituting 'infill' sites.
- Suitability of the location- The permitted Hogs End Court scheme, which was endorsed by a Planning Inspector, the City Council has also previously accepted that Hawkes End is a sustainable location for new housing through a number of planning approvals.
- Grey Belt- Government policy confirms that new homes on Grey Belt land is acceptable within the Green Belt where "there is a demonstrable need for the type of development proposed". On the basis of the last published figures (to a base date of 31st December 2024), we understand that Coventry City can demonstrate a housing land supply of 5.6 years, only marginally above the required minimum of 5 years. Therefore, given the on-going and increasing housing need for all authorities, we suggest that there is a demonstrable housing need.
- Self-Build/ custom- build homes- There is a particular need for self-build and custom-build housing, with planning authorities being required to grant sufficient planning permissions to meet the identified demand for such housebuilding in their area. The City Council's website advises that the authority is still assessing what the level of need is. Therefore, in the absence of such an assessment, it is reasonable to assume that there is a demonstrable need for self-build and custom build housing within the authority's area.

#### Limited infill within a Village:

This application seeks to gain permission for infill development in the Green Belt, given the context of this site, notably the fact that the approved dwellings under planning application (OUT/2020/2762) Appeal Reference (APP/U4610/W/21/3269710) have now been substantially built. Officers accept the dwellings could be infill development in the Green Belt given the commencement of the adjacent dwellings, albeit the site is not within a village.

With regards to Hawkes End being a village this does not have a definitive definition or boundary to state this is a village and is not identified as such in the Development Plan. In our opinion the collection of buildings is more akin to a hamlet rather than a village. Villages normally have community facilities and services, and Hawkes End consists of a few houses and one or two farm buildings with no community facilities or services.

The first test concerns whether the settlement in which the application is sited is a “village” or not. An appeal located in Staffordshire referenced APP/B3438/W/18/3211000 was dismissed and the inspector upheld that the proposal was judged to be sited within a hamlet rather than a village on the basis that it did not have church building. Within the application area; Hawkes End there is no church building, so Hawkes End cannot be classed as a village.

The application site is located within Hawkes End, a small settlement along Hawkes Mill Lane. Hawkes End is located to the West of Brownhill Green, a larger residential settlement along the outskirts of Coventry and North of Allesley Village. Historic post war aerial photographs show a clearer separation between the Hawkes End, Brownhill Green Settlement and Allesley Village. However, over time the settlements have largely merged with one another and there is no defined administrative or map boundary defining the village boundaries. Notwithstanding this there are considered to be three historically distinct settlements present.

Brownhill Green formerly had a church building at the Brownhill Green United Reformed Church however following the grant of permission FUL/2014/3615 this has since been demolished and replaced with housing. There are no significant community amenities, such as schools, doctors’ surgeries or shops etc. with the only and nearest public facility being the White Lion Pub. Having regard to appeal APP/B3438/W/18/3211000, the inspectors reasoned that *“while a church may have once existed in Ridgeway, there is no church there now as it has been replaced by a dwelling known as Chapel House. There are also no other associated buildings in Ridgeway that would, in my judgement, mean that Ridgeway is anything more than a hamlet”*. Therefore, it is concluded that Brownhill Green, is considered to be a hamlet. There is currently no church within Hawkes End or Brownhill Green with the nearest church now located at Saint Thomas’ Church on Tamworth Road and All Saints Church, Allesley. There are no local amenities along Hawkes Mill Lane or Ted Pitts Lane. Therefore, Hawkes End is not classed as a village.

The development in our view is not classed as limited infill within an existing village, nor does it comply with any of the other criteria within Paragraph 154 of the NPPF.

Limited infill within existing ribbon developments:

The development is not classed as limited infill within existing ribbon developments; the proposed development is off an access track and not a main route/ road.

The proposal does not comply with the self-build element of Policy H3 as the development is not considered to be limited infill within existing ribbon developments. Ribbon development consists of single rows of buildings along roads generally leading away from towns. In this situation, the development site is situated to the rear of what could potentially be considered a ribbon, however it does not and could not form part of the

ribbon itself. We do not accept that one ribbon could be positioned back-to-back with another.

It is also noted that the Council is currently able to demonstrate a 5-year housing land supply figure of 5.91 years, as such, and in accordance with the NPPF, we would not consider there to be an unmet need of housing that would require residential development to occur in the Green Belt.

#### Grey Belt:

Having reviewed paragraph 155 of the NPPF, it is arguable that the site does not strongly contribute to purposes a) b) or d) in paragraph 143. However, we are at odds when it comes to there being demonstrable need for the development. Whilst the agent makes an interesting argument with regard to the specifics of self-build, there will be many dwellings approved every year within the City of Coventry which would be suitable for self-build, whether the applicant identifies themselves as a self-builder or not. A case in point would be the four dwellings adjacent to this site.

Even if it could be argued that the site is Grey Belt Land, given that we can demonstrate a 5-year housing land supply of 5.91 years, in NPPF terms there is no demonstrable unmet need for housing in Coventry and as such the site is not considered to meet the tests for Grey Belt.

With regard to the sustainability of the site, it would be a difficult place to live without running a private car due to the distances to basic facilities such as shops, primary school etc. Many other sites in the area which have been approved dwellings have been either conversions or redevelopment of previously used sites for which weight is generally afforded to the reuse of the site and the sustainability of the location has slightly less prominence.

Therefore, the development is contrary to Paragraph 155 of the National Planning Policy Framework and does not constitute Grey Belt land.

Notwithstanding the above, the proposal will result in the demolition of the existing garage to clear the access to allow the plots to be accessed. The submitted site plan indicates that the garage would be replaced utilising permitted development rights, however an assessment of whether this would be lawful falls outside the scope of this application.

Therefore, in conclusion, the development is inappropriate development in the Green Belt, and it is considered that the very special circumstances do not outweigh the harm. The proposal is contrary to Policies H3 and GB1 of the Coventry Local Plan 2017, the emerging Coventry Local Plan 2025 and the aims of the National Planning Policy Framework.

#### **Openness of the Green Belt and character of the area**

The application site is located to the rear of the properties fronting onto Hawkes Mill Lane, is accessed via a private single track and is heavily screened from any public vantage points.

The application site is just grassland with no previous development of the land. The provision of two dwellings and the associated domestic paraphernalia would result in a

form of development that when viewed from the surrounding area would be visible. Whilst some farmhouses are set back and sometimes behind existing linear development, the new buildings in their form would be considered out of character with the rural setting of the site and would result in harm to the openness of the green belt. In fact, even if the two houses could not be seen from any public vantage points, the erection of buildings on the land would reduce the openness of the Green Belt and is therefore harmful.

The provision of two houses will add a suburban character to the area by their siting. Together with the associated domestic paraphernalia associated with residential uses, will harm the character of the area and the openness of the Green Belt and is therefore considered to be inappropriate development by definition and contrary to the aforementioned paragraphs of the NPPF.

Whilst the provision of two market dwellings attracts some limited weight in favour of the proposal, no very special circumstances have been demonstrated to outweigh the harm identified above.

### **Future residential environment**

An indicative site plan and street scene elevation has been submitted. Two dwellings can sit comfortably within the plot. The garden depths are to be around 30 metres which complies with the Residential Design Guidelines SPD. There is also sufficient space for bin storage and parking. Therefore, the amenity for the future occupants would be acceptable.

### **Impact upon residential amenity**

The properties within Hawkes Mill Lane are set over 30m away from the boundary with the edge of the site. Plot A is located 4.5 metres from the closest residential property (plot 4) on the approved PL/2025/0000555/FUL. Plot B is located 9.7 metres away from Hogs End Farm. There is separation distance of 3.6 metres between Plots A and B.

Given the significant separation distances between the proposed houses and the existing properties, the proposed dwellings are not considered to have a detrimental impact in terms of overlooking, loss of privacy and loss of light in accordance with Policy DE1 of the Coventry Local Plan 2017, the emerging Coventry Local Plan 2025, and accords with the general principles of the SPG Design Guidance for New Residential Development.

### **Access and highway considerations**

Having undertaken a full assessment of the development proposals. The existing access between Nos 244 and 248 Hawkes Mill Lane serves the dwellings within the grounds of 246 Hawkes Mill Lane. The access has suitable visibility and would be considered acceptable to accommodate two further dwellings as proposed.

Notwithstanding the above, the Local Highway Authority (LHA) currently have the following concerns:

The application site is not considered to be in an accessible location. According to the CIHT's 'Planning for Walking' (2015) publication, walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800m). This is also reflected in the National Design Guide (2019), which defines "Walkable: Local facilities are within walking distance, generally considered to be no more

than a 10 minute walk (800m radius)", and also Active Travel England's (ATE) 'Standing Advice Note: Active travel and sustainable development' which indicates that a mix of local amenities should be located within an 800m walking and wheeling distance (using well-designed routes) of all residential properties.

The nearest bus stop to the site is located along Brown's Lane, near to the junction with Hawkes Mill Lane, approximately 965m walking distance from the centre of the application site. The LHA requires bus stops to be located within 400m walking distance of dwellings. The nearest school to the site is Allesley Primary School, approximately 2.6km walking distance from the site. The nearest medical services are Allesley Doctors Surgery and Allesley Pharmacy, located approximately 2.6km and 2.9km respectively from the site. The nearest retail store to the site is One Stop Coventry Park Hill, approximately 3.4km walking distance from the site, but the nearest supermarket is Morrisons / Aldi at Alvis Retail Park, approximately 5km walking distance from the site. The distance of the site to the nearest local facilities and amenities exceeds the required distances set out in Policy H3 of the Coventry Local Plan 2017, in addition to the guidance set out above.

The LHA also has concerns that access to some of the facilities listed above will require future occupants of the development to travel to/from the west of the site. The existing footway along Hawkes Mill Lane terminates approximately 145m to the west of the site access, there is a lack of street lighting, and the speed limit increases to the National Speed Limit (60mph). This is also the case along Washbrook Lane. It is therefore unlikely that this route would be safe or suitable for use by pedestrians and cyclists, which conflicts with the NPPF which requires developments to prioritise walking and cycling.

The agent has submitted a response to the highway objection dated 14<sup>th</sup> November 2025. The following points have been raised:

- As there has been no change in circumstance since the 2022 application with the same Local Plan policies being on place there is no justification for reaching a different conclusion in relation to highways and accessibility matters.
- There have been several other application in the immediate vicinity and sustainability and accessibility concerns have not been raised.
- Policy H3 distances should be achieved wherever possible.
- Hawkes End lies in a sustainable location on the outskirts of the City.
- Policy H3 supports new self-build housing within ribbons of development within the Green Belt. It would be unacceptable for the council to apply the same accessibility criteria to 'self-build housing within ribbons of development' as those sites within the main built-up area of the City.

The Local Highway Authority have reviewed the response and their comments still stand. The history of the site and nearby developments were taken into consideration when assessing the current planning application. Officers still consider the application site to be in an unsustainable and inaccessible location.

Again, officers appreciate that there was a previous application at the site and nearby developments approved, however, the NPPF has been updated since then, which requires developments to adopt a vision-led approach to deliver sustainable places, which has not been achieved in this instance.

In respect of this application the Highway Authority objects to the current proposals.

### **Air quality**

Environmental Protection officers have no objections subject to conditions in relation to a Construction Management Plan, Nox boilers and EV charging points.

### **Ecological assessment**

Policy GE3 of the Local Plan states that Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced.

Ecology officers' states that the non-native and ornamental hedgerow be amended to be a native hedgerow, non-native hedgerows are not as beneficial to UK wildlife. Ideally the species chosen should be common beech, hawthorn, alder buckthorn, blackthorn, and hazel. Ideally all of these species should be planted. The plans state that two ornamental ponds will be created. It is vital that a management plan is created for this, ponds offer great habitats for wildlife and is a habitat that is really needed in Coventry.

Ecology officers have no objections subject to conditions in relation to lighting, biodiversity features, and a LEMP. No BNG is required given this development is classed as self-build.

### **Equality Implications**

Section 149 of the Equality Act 2010 created the public sector equality duty. Section 149 states:-

(1) A public authority must, in the exercise of its functions, have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Officers have taken this into account and given due regard to this statutory duty, and the matters specified in Section 149 of the Equality Act 2010 in the determination of this application.

There are no known equality implications arising directly from this development.

### **Conclusion**

The proposed development is considered to be unacceptable in principle and would constitute inappropriate development within the Green Belt without demonstration that very special circumstances apply, contrary to Policies GB1 and H3 of the Coventry Local Plan, the emerging Coventry Local Plan 2025 and the aims of the National Planning Policy Framework. The application site is not considered to be in an accessible location, and inadequate measures have been proposed to make the site sustainable contrary to

Policies H3, AC1, AC4 and AC5 of the Coventry Local Plan. It is therefore recommended that planning permission is refused.

## **POLICY APPENDIX**

National Planning Policy Framework (NPPF) December 2024.  
Coventry Local Plan 2017 & Emerging Local Policy  
Supplementary Planning Guidance/ Documents (SPG/ SPD):

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that is relevant, proportionate and necessary to do so. The NPPF increases the focus on achieving high quality design and states that it is "fundamental to what the planning and development process should achieve".

### **Principle of development**

The National Planning Policy Framework, paragraph 11, states that "Plans and decisions should apply a presumption in favour of sustainable development. For Decision Making, this means:-

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

Footnote 8 to paragraph 11 confirms that this includes situations where the local authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer set out in paragraph 78).

Based on the provisions of the NPPF 2024 the Council can demonstrate a 5.91- year housing land supply as of 31st March 2025.

### **Impact upon the openness of the Green Belt and character of the area**

Policy GB1 within the Coventry Local Plan 2017 relevant points are as follows:

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

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

Policy H3 within the Coventry Local Plan 2017 is as follows:

‘1. New residential development, including opportunities for self-build homes and starter homes, must provide a high-quality residential environment which assists in delivering urban regeneration or contributes to creating sustainable communities and which overall enhances the built environment.

2. In addition, opportunities to provide self-build homes and starter homes will be considered acceptable as part of limited infill within existing ribbon developments within the Green Belt where it is demonstrated that they do not have an adverse impact upon the openness and integrity of the wider Green Belt.

3. A suitable residential environment will include safe and appropriate access, have adequate amenity space and parking provision and be safe from environmental pollutants such as land contamination, excessive noise and air quality issues.

4. Wherever possible new developments should also be:

- a) within 2km radius of local medical services;
- b) within 1.5km of a designated centre within the city hierarchy (policy R3);
- c) within 1km radius of a primary school;
- d) within 1km of indoor and outdoor sports facilities; and
- e) within 400m of a bus stop
- f) within 400m of publicly accessible green space.

5. Proposals should also be in conformity with all other relevant plan policies

6. Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset, to ensure all sites have easy access to high quality public transport and walking and cycling routes

7. The delivery of self-build homes will be supported where they meet the criteria of this policy.’

For information both of the above policy points Policy GB1 (point 7) and Policy H3 (point 2) have been removed from the emerging Local Plan and there is an ever increasing amount of weight attached to the emerging Local Plan.

In terms of decision-taking in the context of NPPF para 143 (the five purposes of Green Belt) National Policy (Paragraph 153) confirms that development that is harmful to the Green Belt should not be approved except for situations of ‘very special circumstances. This is clearly a pertinent consideration in relation to this application.

Paragraph 154 of the NPPF states Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- a) buildings for agriculture and forestry;

- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.
- h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
  - i. mineral extraction;
  - ii. engineering operations;
  - iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
  - iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;
  - v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
  - vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

In terms of Grey Belt, the NPPF definition of Grey Belt is as follows 'for the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

Paragraph 143 of the NPPF states 'Green Belt serves five purposes:

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

Paragraph 155 of the NPPF states 'The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

### **Future residential environment**

Chapter 12 of the NPPF requires that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

Policy DE1 of the Coventry Local Plan 2017 seeks to ensure high quality design and development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.

### **Impact upon residential amenity**

Policies H3, H5 and DE1 of the adopted Local Plan seek to ensure that development proposals provide a suitable living environment for future occupiers, whilst also not resulting in a detrimental impact to existing/neighbouring residential occupiers, the NPPF reaffirms the importance of quality design.

### **Access and highway considerations**

Policy AC2 of the Coventry Local Plan 2017 requires new developments to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network.

### **Air Quality**

Policy EM7 of the Coventry Local Plan 2017 requires new developments to ensure that there is not an increase in air quality issues, this is supported and consistent with Paragraph 199 of the NPPF (2024) which states that planning decisions will have due regard for Air Quality Management Areas, of which the site and the rest of the city lies within.

### **Ecological assessment**

Policy GE3 of the Coventry Local Plan 2017 states that Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced.

## REASON FOR REFUSAL

<b>1.</b>	<p>The application site lies within the Green Belt where strict policies of restraint apply. The development of the site for two houses will cause serious harm to the Green Belt because it: -</p> <ul style="list-style-type: none"><li>i) is inappropriate;</li><li>ii) diminishes openness;</li><li>iv) conflicts with the purpose of including land in the Green Belt by encroaching upon the countryside, extending urban sprawl, and is harmful to the maintenance of its character; whilst failing to contribute to the achievement of any of the objectives for the use of land in the Green Belt.</li></ul> <p>No very special circumstances have been put forward to justify the proposal in order to outweigh the harm which would be caused by the proposal. In consequence the application is contrary to Policies GB1 and H3 of the Coventry Local Plan 2017 and the aims and guidance contained within the National Planning Policy Framework and is not justified by any other material considerations.</p>
<b>2.</b>	<p>The application site is not considered to be in an accessible location, and inadequate measures have been proposed to make the site sustainable. The existing walking and cycling routes to nearby local facilities and amenities are not considered to be appropriate to support walking and cycling. It is therefore considered that the proposals fail to comply with Policies H3, AC1, AC4 and AC5 of the Coventry Local Plan 2017, and Paragraphs 115 and 117 of the National Planning Policy Framework 2024.</p>