



## **Gladman Developments Ltd**

### **Phase 1**

#### **Matter 6 – Planning and environmental constraints**

**Qu6.3 Noting the interaction with matter 4, have alternatives to release of Green Belt sites been considered, including the capacity of existing urban areas?**

- 1 Not fully. There exists significant additional capacity outside of the Green Belt for residential development. In particular areas for potential development exist in the top tier settlement of Atherstone with Mancetter and on the edge of Tamworth, classified as second tier in the settlement hierarchy policy LP2. Examples of these sites were submitted by Gladman in our submission stage representations. An application at Nuneaton Road, Mancetter for 115 dwellings is currently awaiting determination by the Council under reference PAP/2017/0278.

**Qu6.4 Whilst consideration of individual sites will fall to matter 9, is the broad extent of the Meaningful Gap robustly evidenced [CD6/10], and the intended application of associated policy LP5 justified? How does the purpose of the Meaningful Gap differ to that of the Green Belt?**

- 2 No, the Meaningful Gap is not robustly evidenced and the associated policy LP5 is not justified. Gladman addressed this issue extensively in our submission representations, as part of this submission an assessment of the Meaningful Gap was undertaken by CSA Environmental. We also, through this evidence, demonstrated how the Council had, in effect, changed its mind about elements of the Meaningful Gap in between various iterations of its evidence.
- 3 In 2014, North Warwickshire Borough Council published a Meaningful Gap Assessment, which divides the Meaningful Gap into 10 Areas. The assessment adopts a traffic light scoring system for a number of considered constraints against which each Area is assessed, whereby Red is High Sensitivity/Impact, Amber is Moderate Sensitivity/Impact and Green is Low Sensitivity/Impact.
- 4 Gladman consider the Meaningful Gap using the omission site promoted at Green Lane, Tamworth as an example, there are likely other examples which demonstrate that the Meaningful Gap is not justified. The Green Lane site forms the majority of Area 7, with the Area

continuing north to include land up to Tamworth Road and continuing south to include the field between Westfields and the Tamworth services. The assessment describes the landscape of Area 7 as being 'urban fringe', with a physical and visual relationship to Tamworth / Stoneydelph. The main constraint is the potential impact of the HS2"Y" route which cuts the south eastern corner of the Site and housing at Westfields. The assessment states that the sports facilities / playing fields at Tamworth Recreation Ground should be retained or replaced within any proposals. Although there are no natural, environmental or ecological designations affecting the Area, it does contain a mix of 2, 3a and 3b agricultural land classification, including some areas of very good quality agricultural land.

- 5 The assessment scores Area 7 as being of low sensitivity in terms of Landscape, Heritage and Properties constraints and moderate sensitivity in terms of infrastructure and Environmental constraints. The overall recommendation for Area 7 is not to include the area within the Meaningful Gap but to note the presence of very good quality agricultural land and recreational facilities to the north.
- 6 In August 2015, the original 2014 Meaningful Gap Assessment was republished with alterations, including crucially the addition of a 'Geographical proximity/Narrowness of Gap' constraint against which each Area was further assessed. Area 7 (within which the Site lies) was assessed as forming a significant gap between Tamworth and the M42 that has already been partially impacted by some smaller scale development along the former Tamworth Road including at the Polesworth football ground (Tamworth Recreational Ground). The assessment goes on to say that the northern part of the Area is considered to operate as a rural gateway into North Warwickshire. The assessment also states that Area 7 is sensitive to development which could impact significantly on the maintenance of a "meaningful gap" between Polesworth and the M42.
- 7 The overall recommendation for Area 7 is stated as being to include the area in the Meaningful Gap, contrary to the conclusion of the 2014 assessment. There is a lack of thorough justification and clarity for this change of stance between the two assessments. A number of points raised in this assessment are also unclear including how the northern part of the Area operates as a rural gateway into North Warwickshire and where this is perceived from. Given the containment of Area 7 from the countryside to the east of the M42, it is also unclear why the exclusion of Area 7 from the Meaningful Gap would significantly impact on the Meaningful Gap between Polesworth and the M42.
- 8 In 2018, North Warwickshire Borough Council commissioned Land Use Consultants (LUC) to produce a further assessment titled 'Assessment of the Value of the Meaningful Gap and

Potential Green Belt Alterations'. The purpose of the assessment was to 'determine whether each parcel fulfils the objectives of the Meaningful Gap designation, and whether they have the potential to serve the purposes of Green Belt as defined in the NPPF'. The assessment uses Green Belt Purpose 2 ('to prevent neighbouring towns merging into one another') in order to form the basis of the assessment for whether each parcel fulfils the objectives of the Meaningful Gap designation. This approach to applying a Green Belt methodology to assess the role of the Meaningful Gap is questionable and differs from the previous methodologies used in the 2014 and 2015 assessments.

- 9 The LUC assessment found that against Green Belt Purpose 2, Area 7 scored 4/4, stating that the Area forms a crucial part of the gap between Tamworth and Polesworth, as well as a separation between Tamworth and Birchmoor. It is considered that this assessment gives too greater weight to the Purpose 2 score, given that Area 7 forms part of a much wider area of land which separates Tamworth and Polesworth. Although it is acknowledged that there would be a slight reduction in the gap between settlements should Area 7 be developed, there would nevertheless still remain a clear separation between these two settlements. It is therefore considered that Area 7 should score moderately against Green Belt Purpose 2.
- 10 The LUC assessment also places significant weight on the existing development at Birchmoor, which it describes as further increasing the contribution that this Area 7 makes to the sense of separation between settlements. It is important to note that the Meaningful Gap policy's fundamental purpose is to maintain separation between Tamworth and Polesworth. Furthermore, the North Warwickshire Adopted Core Strategy does not recognise Birchmoor as a settlement within its Settlement Hierarchy. Should weight be given to Birchmoor then it is important to note that the existing gap between development at Birchmoor and at Westfields (to the immediate south of the Site) is approximately 150m at its narrowest point. Development of the Site would not reduce the distance of this gap any further than that of the existing situation.
- 11 The treatment of the land in area 7 therefore demonstrates the level of inconsistencies in the Council's assessment of the Meaningful Gap. At the very least this site should not form part of the gap, but the errors identified here flag up a fundamental concern as to whether such a gap is justified in principle or just whether the extent of that gap has been properly assessed and robustly evidenced.
- 12 The differences between the Meaningful Gap and Green Belt are seemingly that the gap designation is merely interested in coalescence rather than the more onerous tests for Green Belt identified in the NPPF. In this regard it is even more perplexing to consider the scale of

the Meaningful Gap proposed in the Local Plan. Gladman would again refer to the full report prepared by CSA which accompanied our consultation response in January and March 2018 and the appeal decisions referenced in those submissions.

- 13 It is our view therefore that policy LP5 is unjustified and unsupported by evidences in its current form. Further work would be required by the Council to identify if there is a need for the gap and what scale any gap ought to be. This should be part of a balanced judgement, being one part of the overall planning assessment of any land which might be incorporated into a Meaningful Gap. Consideration should also be given to the role any land may play, for example Area 7, in providing a sustainable location to meet development needs on the edge of a Category 2 settlement (according to LP2) and also having the benefit of being in a location adjacent to where unmet needs to be met in the Local Plan arise. Only when this comprehensive assessment is undertaken would the Council potentially have a robust assessment of what may form a Meaningful Gap.
- 14 For the avoidance of doubt Gladman do not believe that Area 7 of the currently proposed Meaningful Gap can be justified.