

# Allesley Parish Council's Response to the Draft Coventry Local Plan – 2014

---

## **Introduction**

The parish of Allesley is situated in Coventry and lies on the north-west fringe of the city. It is a predominantly a rural parish within Coventry's Green Belt and is an extensive area of Ancient Arden countryside of historic landscape importance. The Parish Council is the first tier of local government and represents the residents of Allesley parish. The Parish Council is a local authority and is the level of government closest to the local community, with Coventry City Council above it in the hierarchy and the principal authority.

The importance of having an up-to-date, robust and sustainable Local Plan for the city of Coventry is recognised and fully supported by Allesley Parish Council. The Local Plan must conform to the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), which provides an appropriate framework within which Coventry can help to meet its changing needs and future aspirations.

The strategy described in the Plan is to identify housing need based on population projections using the Joint Strategic Housing Market Assessment (SHMA) Annex 2014 and the 2012 Subnational Population Projections (SNPP). It then goes on to identify three ways to meet this housing need:

**Scenario 1** - building in the urban area and no building on Coventry Green Belt, but accommodating the shortfall on non-Green Belt land in Warwickshire.

**Scenario 2** - building entirely within the City boundary; re-designating the Green Belt accordingly.

**Scenario 3** - some combination of 1 and 2.

Allesley Parish Council strongly objects to the allocation of land within the parish within the existing Green Belt as proposed in Scenarios 2 and 3. The NPPF makes clear that the Green Belt boundary should only be altered in '*exceptional circumstances*'. This position is supported at ministerial level; in the NPPG; and in case law.

Allesley Parish Council does not consider that 'exceptional circumstances' exist or have been demonstrated by this draft Local Plan to justify the alteration of the Green Belt boundary.

### **National Planning Policy Framework (NPPF)**

Paragraph 84 of the NPPF makes it clear that when *"reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development."* It goes on to say that *"they should consider channelling development towards urban areas inside the Green Belt boundary..."* This provides a clear direction from the government on promoting sustainable development within existing urban areas and on previously developed land (brownfield sites). Allesley Parish Council fully supports this approach and considers that the City Council's proposals to build on substantial parts of the Green Belt fundamentally conflicts with this part of the NPPF.

On 6<sup>th</sup> October 2014 the DCLG also published additional guidance that has been incorporated into the NPPG and is particularly relevant to this emerging Local Plan:

#### **Paragraph 44: Reference ID: 3-044-20141006**

*Do housing and economic needs override constraints on the use of land, such as Green Belt?*

The NPPG says: *"... need alone is not the only factor to be considered when drawing up a Local Plan local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted... Such policies include land designated as Green Belt, Local Green Space..."*

In other words, housing needs do not override Green Belt constraints.

#### **Paragraph 45: Reference ID: 3-045-20141006**

*Do local planning authorities have to meet in full housing needs identified in needs assessments?*

The NPPG says: *"Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land and in so doing take account of any constraints"*

*such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”*

In other words, housing needs do not need to be met in full, if Green Belt constraints make it impossible to do so.

### Scenarios 2 and 3

Scenarios 2 and 3 clearly ignore National Planning Policy Guidance. They assume housing needs must be met in full, contrary to paragraph 45, and they assume Green Belt constraints can be disregarded to meet the housing need, contrary to paragraph 44. If the Local Plan went ahead with Scenarios 2 or 3, it would not comply with the most recent NPPG.

The underlying issue is that the built-up area of Coventry is relatively close to the city boundary, and the distance between the edge of the built-up area in the parish of Allesley and Birmingham Airport, for example, is only about 7 miles (11km). As a result, there is no Green Belt land available to accommodate the numbers of homes identified in the Strategic Housing Market Assessment (SHMA). Once the land designated to accommodate 16,500 houses (at the proposed housing density) has been used, the city will not be in a position to expand further, without major and unsustainable incursions into the Green Belt, contrary to NPPG.

### **Soundness of the Local Plan**

Paragraph 182 of the NPPF emphasises the importance of a local planning authority submitting a plan for examination which it considers is “sound” – namely that it *is positively prepared; justified; effective; and consistent with national policy*. Allesley Parish Council considers that there is a general lack of transparency in the overall presentation of the draft Local Plan with regards to Green Belt. Given that it forms such a critical part of the City Council’s plan to deliver 36,220 homes, the Council’s ‘Policy Approach’ on Green Belt should be made much more explicit, perhaps in a separate Green Belt section, bringing together all the relevant information, with clear cross-referencing to other material (including a list of all the Green Belt sites to be removed/included; and the proposed link road through the Green Belt in Keresley (from Long Lane/Coundon Wedge Drive) clearly identified and its ‘exceptional circumstances’ justified by a sound evidence base.

Paragraphs 178 - 181 of the NPPF also emphasise that the duty to co-operate plays a very important role in the planning process. It is the mechanism for ensuring that:

*“...strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Joint working should enable local*

*planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework.”*

The importance of this role is emphasised by the sanctions that can follow if this duty is not discharged, as the Plan may be found to be unsound by the Inspector. In this context, the public consultation on the Warwick District Local Plan ended on 27th June 2014 (although there is currently a further consultation on focused changes to the Local Plan until 12<sup>th</sup> December 2014, prior to its submission to the Secretary of State for Communities and Local Government for independent examination). However, the Warwick District Local Plan does not appear to have been specifically co-ordinated with the draft Coventry Local Plan to accommodate part of its 36,220 homes and therefore, the duty to co-operate as reflected in these Local Plans may not pass the test of ‘soundness’.

### **Land at A45 - Eastern Green- Agricultural Land Classification**

Policy to protect agricultural land in England is set out in the National Planning Policy Framework (paragraph 112). Decisions rest with the relevant planning authorities who should take into account the economic and other benefits of *the best and most versatile agricultural land*. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The Government has also re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper *The Natural Choice: securing the value of nature* (June 2011), including the protection of the *best and most versatile agricultural land* (paragraph 2.35)

Allesley Parish Council does not consider that the City Council has given due consideration to this policy guidance in the preparation of this draft Local Plan, particularly with regard to the land at A45 - Eastern Green.

### **Conclusions**

Allesley Parish Council considers there is a general lack of transparency in the overall presentation of the draft Local Plan with regards to Green Belt and its ‘Policy Approach’, particularly in view its fundamental importance within the overall requirements and delivery of the Plan. Furthermore, the Parish Council would suggest that it currently does not pass the Local Plan test of soundness as detailed in paragraph 182 of the NPPF with regards to being positively prepared; justified; effective; and consistent with national policy.

Allesley Parish Council objects to the allocation of residential land on this scale within the existing Green Belt as proposed in Scenarios 2 and 3 (and the green space land at A45 - Eastern Green). The NPPF makes clear that the Green Belt boundary should only be altered in 'exceptional circumstances', which have not been clearly demonstrated by a robust and proportionate evidence base as part of this draft Local Plan.

The revised NPPG states that local authorities should *"take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."* Having established need, the City Council does then have the flexibility to provide further evidence to demonstrate why the full need cannot be met and why an alternative policy approach is being adopted, reflecting relevant environmental constraints, including Green Belt.

The City Council need to clearly demonstrate 'exceptional circumstances' but also recognise that there may be 'constraints' such as Green Belt, which will restrain the ability of the City Council to meet its need (as currently proposed). Allesley Parish Council would urge Coventry City Council to reconsider its strategy and 'aspirations' to expand the number of homes in the city by 36,220, with all of the environmental and associated problems and pressures that will inevitably result. Also, in the light of recent National Planning Policy Guidance, that the City Council consider supporting Scenario 1 and possibly modifying the Scenario to reflect the following:

*"Building predominantly in the urban area on previously developed land, with no building on Green Belt within the parish, and where necessary, accommodating the shortfall on non-Green Belt land in Warwickshire, recognising that development needs to be restricted, as the ability of the City Council to meet its need is restrained."*