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29<sup>th</sup> March 2019

BY EMAIL ONLY: [strategicplanning@bromsgroveandredditch.gov.uk](mailto:strategicplanning@bromsgroveandredditch.gov.uk)

Dear Sirs

## LANDOWNER RESPONSE TO LICKEY & BLACKWELL AND COFTON HACKETT NEIGHBOURHOOD DEVELOPMENT PLAN (NDP) – REGULATION 16 CONSULTATION

I write on behalf of landowners who own land within the Neighbourhood Development Plan (NDP) area adjacent to the Old Birmingham Road. Having read the NDP with great interest and considered the information that has led to its current form, I have the following comments to make on behalf of my clients in respect of the consultation.

### General Comments

- NDP Intentions re pending Green Belt review
  - The pending Green Belt review is a strategic matter being led by the Local Planning Authority (LPA).
  - The NDP appears at various points to seek to provide a perceived extra layer of protection from development to certain areas, by naming them specifically as parts of the Green Belt over which there are particular local concerns about pressure from development. For example, paragraph 6.15 identifies farmland at Yew Tree Farm, the quarry on Brookhouse Road and land on Linehouse Lane.
  - If this is the intention of the NDP, then we object to that intention.
  - We echo a previous consultation response submitted in a different consultation by a different landowner that the Green Belt is a planning tool designed primarily to prevent urban sprawl, not to protect landscapes with high value.
  - It is appreciated that the rural feel of the area in such close proximity to the larger conurbations of Bromsgrove and Birmingham is important to the local community, as are the separate identities of the settlements and villages within the plan area.
  - The Green Belt review will be looking at the Green Belts' compliance with its five purposes. Safeguarding countryside because neighbours like to look at the semi-rural character is not one of the five purposes of the Green Belt.

- Small-scale extensions adjacent to existing settlements would not necessarily result in the merger of urban areas or smaller villages.
- We note that the NDP will be reviewed following the Green Belt Review to ensure it remains a compliant plan.
- We also note that the Parish Councils are committed to remaining involved in the Green Belt Review process but this will run alongside the NDP process.

Residents and other users of the area need to be careful not to assume that the statements included in the NDP, referencing Green Belt and the need to protect areas that local people are fond of, will prevent Green Belt release. We disagree therefore with the statement made at paragraph 6.16, that the NDP provides robust evidence for the forthcoming Green Belt Review.

We would be happy to discuss this further and answer any questions that you may have, please do contact me.

Thank you.

Yours faithfully

**RUTH ML FARRELL**  
**ruth@theruralbusiness.co.uk**

*Encs. Regulation 16 Response Form*

## About this Consultation

The joint Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan 2018-30 was submitted to Bromsgrove District Council on 12<sup>th</sup> December 2018. The District Council is satisfied the Neighbourhood Plan is in accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and is therefore publicising the plan proposal and inviting representations as part of its obligation under Regulation 16 of the above regulations.

In order to give the Council a clear and accurate picture of your views, it is preferred that you make your representation on this specific representation form (although other responses will be accepted). It is important to specify which part of the neighbourhood plan (by page and/or paragraph and/or policy number) you are commenting on.

The representation period is open for 6 weeks from:

**Thursday 14<sup>th</sup> February 2019 to Friday 29<sup>th</sup> March 2019**

## Where to view the Documents

During the dates of the representation period, the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan can be viewed at the following locations:

- Online at <https://www.bromsgrove.gov.uk/lbchnp> or on the Lickey & Blackwell parish council website and the Cofton Hackett parish council website at <https://www.lickeyandblackwellpc.org/> <http://coftonhackettpc.org/>
- In hard copy format (during opening hours) at Bromsgrove Library, Parkside, Bromsgrove B61 8DA.

Supporting submission documents that accompany the Neighbourhood Plan, including a Basic Conditions Statement, Sustainability Appraisal and a Consultation Statement, can also be viewed at the locations above and online.

## How to Respond

You can make representations by responding using the following methods:

 Email	<a href="mailto:strategicplanning@bromsgroveandredditch.gov.uk">strategicplanning@bromsgroveandredditch.gov.uk</a>
 Post	Strategic Planning – Bromsgrove District Council Parkside Market Street Bromsgrove Worcestershire B61 8DA

## Data Protection

The information collected will be processed in accordance with the Data Protection Act 2018. Information from the forms will be stored on a computer database used solely in connection with the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan. All representations received by the District Council will be sent to the person appointed to undertake an independent examination into the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan, specifically whether the plan is deemed to meet the ‘basic conditions’ set out in Schedule 4B para.8(2) of the 1990 Town and Country Planning Act.

Any representation may also include a request to the District Council to be notified of the local authority’s decision on whether the neighbourhood plan is to be ‘made’ in accordance with Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended). **Please make this request using the question/answer box at the end of this representation form.**

### Your contact details

<b>Name</b>	Ruth ML Farrell
<b>Organisation</b> (if applicable)	DJM Consulting
<b>Representing</b> (e.g. self or client)	Local Landowning Client
<b>Email Address</b>	<a href="mailto:ruth@theruralbusiness.co.uk">ruth@theruralbusiness.co.uk</a>
<b>Postal Address</b>	The Rural Centre, West Farm, Aston Eyre, Bridgnorth, Shropshire WV16 6XB
<b>Telephone Number</b>	01746 714089

### Privacy Statement

#### Who is collecting this information

This information is being collected by Bromsgrove District Council.

#### Why we collect and use this information

We are collecting this information for the purpose of carrying out a statutory representation period on a plan which may become part of the Council's statutory development plan. We are processing this information under the same legal basis.

#### Storing this information

We will keep your personal data until the plan has been 'made' or until such time as you request to be taken off the database prior to this. It will be used only for the purpose stated and will not be shared or sold.

#### Data collection requirements

We may need to share the information that you give to us with an independent examiner as part of a legal obligation in the neighbourhood plan making process, but the information will not be used in any profiling/automated decision making.

#### Further information

If you would like further information about this privacy notice, please contact the Strategic Planning Team at [strategicplanning@bromsgroveandredditch.gov.uk](mailto:strategicplanning@bromsgroveandredditch.gov.uk)

## Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan - Regulation 16 Response Form

### Section 1: Introduction and Background

**Do you have any comments to make on 'Section 1: Introduction and Background' of the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan?**

Please see accompanying short letter.

### Section 2: A portrait of Lickey & Blackwell and Cofton Hackett

**Do you have any comments to make on 'Section 2: A portrait of Lickey & Blackwell and Cofton Hackett'?**

Please see accompanying short letter.

### Section 3: A NDP for Lickey & Blackwell and Cofton Hackett

**Do you have any comments to make on 'Section 3: A NDP for Lickey & Blackwell and Cofton Hackett'?**

Please see accompanying short letter.

#### **Section 4: Vision and Objectives**

**Do you have any general comments to make on 'Section 4: Vision and Objectives?'**

Please see accompanying short letter.

#### **Section 5: Key Issues and NDP Planning Policies?**

**Do you have any general comments to make on 'Section 5': Key Issues and NDP Planning Policies?'**

Please see accompanying short letter.

More specifically, do you have any comments on individual policies or community actions within the Lickey & Blackwell and Cofton Hackett Neighbourhood topic areas?

#### **Topic 1 – Policies for Natural Environment**

Please see accompanying short letter.

**Topic 2 – Policies for Built Heritage and Design**

Please see accompanying short letter.

**Topic 3 – Policies for Housing**

Please see accompanying short letter.

**Topic 4 – Policies for Infrastructure**

Please see accompanying short letter.

**Topic 5 – Policies for community facilities**

Please see accompanying short letter.

**Topic 6- Policies for Commercial and Business Interest**

Please see accompanying short letter.

## Section 6: Next Steps

**Do you have any comments to make on 'Section 6: Next Steps?'**

Please see accompanying short letter.

## Other Comments

**Do you have any other comments on the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan?**

Please see accompanying short letter.

**Would you like to be notified of the local authority's decision on whether this neighbourhood plan is made, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012?**

(If Yes, please ensure your contact details are provided on this form)

Yes

No