

# ALVECHURCH PARISH NEIGHBOURHOOD PLAN (APNP) SUBMISSION

## Regulation 16 Representation on behalf of Cawdor Capital

It is considered that the APNP is deficient for a number of reasons. Indeed, it is considered that these deficiencies go to the core of the APNP such that it is neither sustainable nor does it comply with legal requirements to make the APNP sound. Should the APNP proceed to Examination then Cawdor Capital would wish to appear before the Inspector to expand upon their objections.

Their objections are summarised as follows:

1. The APNP has, at its core, policies relating to the delivery of housing. It bases the subsequent policies upon those policies relating to the delivery of housing as set out in the Adopted Development Plan (the Bromsgrove District Plan. However, the District Council now accepts that it can no longer identify a supply of deliverable housing land sufficient to meet 5 years' needs. As such the Development Plan policies, on which the APNP housing strategy and policies are based, is now out of date (as confirmed by the council's Housing Land Supply assessment as at 1<sup>st</sup> April 2017. As such the APNP is based upon out of date policies in respect of housing delivery.
2. Paragraph 31 of the revised NPPF (July 2018) requires the preparation all policies to be '*underpinned by relevant and up to date evidence*'. The ANPN is based upon policies that are knowingly out of date and, as such, the APNP fails this first and most basic criterion.
3. The APNP notes, at length and in several parts, that there is a need for more local housing – particularly affordable housing (both rent and ownership) for young families and the elderly. Despite this clearly recognised need the ANPN makes no provision to meet that need despite this being *KEY AIM 1*. It simply notes that there is no available land that is not in the Green Belt. In so doing it fails to both meet its own *KEY AIM 1* to provide for acknowledged needs and, as will be noted below, it fails to acknowledge the potential that exists to help meet that need via, for example, brownfield land.
4. It is accepted that the ANPN cannot amend Green Belt boundaries; however, that does not absolve the APNP from supporting the appropriate development of brownfield land in accord with the NPPF. Paragraph 117 of the NPPF requires policies to set out a '*clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land*'. Policy 2 of the ANPN, relating to housing for Hopwood and Rowney Green is in direct conflict with this requirement in that it only supports the development of brownfield land within the built up area where the site is closely surrounded by existing buildings. This is in complete disregard to the NPPF. The APNP has to be in accord with the NPPF. Nowhere in the NPPF is there a requirement that the development of Brownfield sites can only relate to sites within the built up area of a village and closely surrounded by existing buildings. On this basis it is clear that the APNP would not support the development of suitable brownfield land on the edge of the built-up areas. This is far more restrictive than the NPPF which notes, at paragraph 145 that exceptions to the general presumption against development in the Green Belt includes '*the*

*partial or complete redevelopment of previously developed land*'. The criteria where such development would be acceptable is not where such land is within a settlement and closely surrounded by buildings but, instead, where there would be no greater impact upon the openness of the Green Belt **or** where it would not cause substantial harm to the openness of the Green Belt.

5. The importance of making as much use of brownfield land and its role in protecting Green Belts is reflected in paragraph 137 (a) of the NPPF which notes that before Green Belt boundaries are redrawn LPAs must make as much use as possible of suitable brownfield sites. The extension of Policy H2 of the APNP is that greenfield Green Belt sites will have to be released for development in preference to suitable brownfield sites on the edges of built-up areas. Such a contradiction and conflict with the NPPF is unacceptable.
6. The settlement boundaries used in the APNP are based upon policies that have already been demonstrated to be out of date. They are based upon historic Green Belt boundaries. Whilst it has already been acted that the APNP cannot redraw Green Belt boundaries, the settlement boundaries should reflect current and not historic boundaries. For Hopwood the boundary should be redrawn to include the housing at Woodpecker Close and the commercial open storage area south of Smedley Crooke Place. These areas form part of the built up area of the village and, to exclude these from the settlement definition is perverse and factually incorrect.

Having regard to the foregoing it is clear that the APNP is inconsistent with the revised NPPF on a number of fundamental aspects and is thus not legally compliant nor sound.