



Alrewas Neighbourhood Plan Submission Consultation Representation Form

Alrewas Parish Council has submitted the Alrewas Neighbourhood Plan to Lichfield District Council. Under section 16 of the Neighbourhood Planning (General) Regulations 2012 Lichfield District Council are now consulting on the proposed Neighbourhood Plan and would like your comments. In order for your representation to be taken into account at the Neighbourhood Plan examination and keep you informed of the future progress of the Neighbourhood Plan your contact details are needed. **The closing date for representations to be made is 17th April 2015 at 17:15pm.**

Please return your completed representation forms by the closing date via email to developmentplans@lichfielddc.gov.uk or by post to the following address;

Development Plans & Implementation
Lichfield District Council
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YY

All comments will be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Lichfield District Council in line with the Data Protection Act 1998.

You can view the Alrewas Neighbourhood Plan and associated documents via <http://www.lichfielddc.gov.uk/alrewasnp> or hard copies of the documents are available in reception at Lichfield District Council.

Please complete the boxes below using a separate form for each representation:

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|--------------------------------------|
| Name(s): Mrs Philippa Kreuser |
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| Name(s) of Organisation (if applicable): CT Planning |
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|---|
| Address (including postcode): Trafalgar House 20A Market Street Lichfield Staffordshire WS13 6LH |
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| Email address: apps@ctplanning.co.uk |
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Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan Proposal:

Yes

No

If 'Yes' is your preferred method of contact either via email or post?

Email

Post

Alrewas Neighbourhood Plan Representation Form

Please state which part of the Neighbourhood Plan (for example which section, paragraph or policy) your representation relates to:

Paragraph 3 on page 3

Please use the space below to make comments on this part of the Neighbourhood Plan:

Paragraph 3 on page 3 of the Neighbourhood Plan refers to the fact that the Appendix contains a detailed review of the identified sites and recommendations for their development.

I understand that these have been deleted from the submission version of the Neighbourhood Plan.

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Paragraph 6 on page 39

Please use the space below to make comments on this part of the Neighbourhood Plan:

Objection is raised to the proposed allocation in Alrewas Neighbourhood Plan of only 90 dwellings. By proposing the lowest figure within the range set out within the Local Plan Strategy, the Neighbourhood Plan fails to boost significantly the supply of housing, as required by paragraph 47 of the National Planning Framework (the 'Framework'). The Plan sets out on page 39 that "**this Plan has established that a reasonable allocation for new houses over the life of the Local Plan, is 90 dwellings**". However, the adopted Lichfield Local Plan (February 2015) specifies at Policy ALR4, a proposed allocation to Alrewas of 90-180 dwellings. This proposal has evidently been subject to examination and the Inspector to the Examination did not raise any issues with this proposed figure. Indeed, the Inspector set out at paragraph 164 of his Report that the housing figures are expressed as a minima.

As a key rural settlement Alrewas is highly sustainable and it is wholly appropriate that the village should accommodate a level of housing growth commensurate with its existing size, facilities and sustainability credentials, particularly if the District Council is to achieve the levels of housing growth accepted by the Local Plan Inspector and set out in the Local Plan Strategy.

Objection is raised to the Alrewas Neighbourhood Plan on the basis that the Neighbourhood Plan must have regard to National Policy Policy and in particular paragraph 16 of the NPPF, where it requires Neighbourhood Planning to support the Strategic Development needs set out in the Local Plan and plan positively to support local development. Alrewas Neighbourhood Plan would appear to stifle development and is not promoting a positive approach to development of its area. The Neighbourhood Plan is not a tool to stop new development proposals from coming forward. In its current form the specifying of 90 dwellings in the Neighbourhood Plan is both too prescriptive and too restrictive and does not allow for a flexible and positive approach to Neighbourhood Planning.

Paragraph 184 of the NPPF makes it quite clear that Neighbourhood Plans should not promote less development than set out in the Local Plan. Any conflict between a Policy in a Neighbourhood Plan and Policy in a Local Plan must be resolved (Section 38(5) of the Planning and Compensation Act 2004) in favour of the Policy which is contained in the last document to become part of the Development Plan, in this case the adopted Lichfield Local Plan. It is submitted that the proposed housing allocation in Alrewas Neighbourhood Plan should be amended to be in conformity with Policy ALR4 of the adopted Lichfield Local Plan.

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Email Post

Please state which part of the Neighbourhood Plan (for example which section, paragraph or policy) your representation relates to:

Policy 5.7 : Site Suitability Scoring Matrix

Please use the space below to make comments on this part of the Neighbourhood Plan:

Objection is made Policy 5.7 (Site Suitability Scoring Matrix). It is unclear in the Neighbourhood Plan how the Site Scoring criteria has been devised. Concern is raised that the weighting scores may relate to the opinions gathered from public consultation and then expressed as a percentage. This would not represent a sound approach to the appraisal of planning applications for residential development as proposed in Policy 5.7. It should not be the case that good applications which could deliver a high quality residential scheme for the benefit of local residents be "**dismissed**" due to the application of an inappropriate and subjective site suitability scoring system. Each planning application should be judged on its merits.

Objection is raised on the basis that the Site Scoring Matrix has been included in the Appendix and would appear not to form that part of the formal Neighbourhood Plan which is open to scrutiny by the Inspector and yet the Scoring Matrix is fundamental to the application of Policy 5.7 where it is proposed that all planning applications will be assessed against the Scoring Matrix. A more appropriate approach would be for the Parish Council/Neighbourhood Plan to appraise the sustainability of planning applications using a broader and less numeric criteria that is set out within Policy 5.7. An example of such a checklist is attached (Policy SP7 of the adopted Stafford Borough Local Plan). This Policy requires each application to be judged fully on its merits rather than pre-judged by an unsound weighting system.

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SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY

Priority will be given to supporting the rural sustainability of the Borough by protecting and enhancing its environmental assets and character whilst sustaining the social and economic fabric of its communities. This will be achieved by promoting:

- i. A sustainable rural economy
- ii. Conservation or improvement of the rural environment
- iii. Appropriate rural housing schemes to achieve sustainable communities
- iv. The appropriate re-use of redundant buildings
- v. Use of sources for renewable energy.

6.60 This policy approach is partly delivered by the identification of the Sustainable Settlement Hierarchy in Spatial Principle SP3, through the continued sustainability of these communities in the future. Nevertheless outside of these settlements, and specifically in the area outside the Settlement Boundaries which will be defined for each of these settlements, the policy approach in the other settlements and the countryside to seek to achieve rural sustainability will involve a wide range of measures and approaches, as set out in the Policies (Chapters 9 – 14). In particular, Policy E2 provides specific guidance about the approaches which need to be taken in the rural areas, outside the Green Belt, to achieve a sustainable rural economy; and Policy E3 addresses the particular role which a number of freestanding industrial estates in rural areas, which have become known as 'Recognised Industrial Estates', have in supporting the Borough's economy. Policy C5 provides specific guidance on residential developments outside of settlement boundaries including in the Green Belt.

7. Appropriate mechanisms for achieving the distribution of development

6.61 To deliver the necessary scale and distribution of housing and employment development set out in the Spatial Principles SP2, SP3, SP4 and SP5, a series of mechanisms will be used through the new Local Plan.

6.62 A key element of the approach is that new Settlement Boundaries will be established for each of the settlements listed in Spatial Principle (SP3), which comprise the Sustainable Settlement Hierarchy. The boundaries for each settlement in the Sustainable Settlement Hierarchy will be established in order to provide sufficient scope for the proposed scale of development of housing, employment and other uses, within the defined settlement. A differential policy approach towards supporting or discouraging development will therefore operate either side of that boundary. The following Spatial Principle explains the approach to development that will be adopted either side of the boundary, and the criteria that will be adopted in defining the boundary itself.

6.63 The location of settlement boundaries for each of the settlements listed in Spatial Principle 3 (SP3) will be established in the Site Allocations Development Plan Document. The settlement boundaries may be established through Neighbourhood Plans in the meantime, but will also be shown in the Site Allocations Development Plan Document. Prior to the actual definition being achieved through these processes, the criteria established in Spatial Principle 7 (SP7) will be used to judge the acceptability of individual development proposals.

SPATIAL PRINCIPLE 7 (SP7) – SUPPORTING THE LOCATION OF NEW DEVELOPMENT

Settlement Boundaries will be established for the Sustainable Settlement Hierarchy defined in Spatial Principle SP3. Development or activities of a scale and nature appropriate to secure the sustainability of each settlement, where in the case of housing proposals this is consistent with the delivery of the proportions of development intended by Spatial Principles SP2, SP3 and SP4, will be supported within the Settlement Boundaries.

Development in other locations (in settlements or in the countryside) will only be supported where:

- i) If located within the Green Belt, it is consistent with national policies for the control of development, and Policy E5;

6 Development Strategy

ii) It is consistent with the objectives of Spatial Principles SP6, Policies E2 and C5 in supporting rural sustainability;

iii) It does not conflict with the environmental protection and nature conservation policies of the Plan;

iv) Provision is made for any necessary mitigating or compensatory measures to address any harmful implications.

Settlement Boundaries will be established in accordance with the following criteria. Prior to the establishment of the actual boundaries these principles will be used to assess the acceptability of individual proposals at the Settlements. Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:

a) is in, or adjacent to, an existing settlement;

b) is of an appropriate scale to the existing settlement;

c) is accessible and well related to existing facilities;

d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;

e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

l) will not adversely affect the residential amenity of the locality.

Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.

6.64 The purpose of establishing a boundary is that a different approach to development is implemented on either side. Within the boundary, there would be a presumption in favour of supporting housing and employment development, subject to any other relevant planning considerations. Outside the boundary, this principle would be reversed, and only small scale development would be accepted in exceptional, tightly controlled, cases as defined in the Plan's policies.

6.65 In due course, it is intended that development allocations for specific sites will be identified within the Settlement Boundaries (and the Boundaries themselves) through the Neighbourhood Planning process, or through the preparation of a Site Allocations Development Plan Document.

6.66 In addition to the above, new development proposals should not lead to the sterilisation of significant mineral resources, or compromise the continued operation or expansion of any existing waste management facilities as defined in the Minerals and Waste Local Plans prepared by the Mineral and Waste Planning Authority. In due course the Policies Map will be updated with relevant Local Plan allocations and designations.



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Policy 5.2

Please use the space below to make comments on this part of the Neighbourhood Plan:

Objections are raised to Policy 5.2. The policy requires all applications for development outside the village boundary to be first subject to public consultation. It states that this is in line with Policy ALR4 of the Local Plan Strategy.

Policy ALR4 does not discuss in detail public consultation and does not require all developments to undertake it. The decision to undertake public consultation and engagement should be determined on a case by case basis having regard to the District Council's Statement of Community Involvement. Public consultation and engagement can be onerous, time consuming and costly for some developments of a smaller scale. Developments that are minor or small scale in nature that only impact on immediate neighbours/locality should not have to be subject to public consultation. This policy needs to be tightened up and made specific to ensure it does not needlessly capture all types and sizes of development.

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