

A formal vote was taken by the Parish Council in 2013 to consult with the Parish to designate Stanton Drew as a Neighbourhood Area in order to proceed with formulation of a Neighbourhood Plan (NP). As Parish records will demonstrate the Parish was notified in a variety of ways. Posters and door to door leaflet drop called for volunteers to join as a Neighbourhood Plan team. Under Section 61G of The Town and Country Act 1990 Stanton Drew was formally designated as a Neighbourhood Area for the purpose of Neighbourhood Planning on 6th October 2013.

The Neighbourhood Plan team was/is a team of volunteers from all walks of life in the Parish who volunteered (their unpaid time) to come and work together committed to ensuring our Parish remains a beautiful place to live and work. A team that working with the community has sort to deliver a plan to document, retain and enhance those attributes that the community have told us over the past 5 years or so they value. The team was managed by members of the Parish Council and the Parish Council was the authorised body of the Plan.

All parts of the plan have been out for consultation to the Parish on numerous occasions throughout the past 5 years. Some parishioners engaged with the consultations and others did not, but everyone has had the opportunity to engage throughout so there has been no need for 'tactics' or construed underhand activities that Cllr Waller seems to be concerned about. Quite the opposite.

All documentation has been put up on both the Parish Council and the Neighbourhood Plan websites for all to see – across the world if they want to read it in Australia. You can probably read our Draft plan at the Space Station!

In addition, we have been guided throughout by B&NES planning and legal departments to ensure that the Plan has been conducted in the correct manner and can achieve what the community wants.

Which parishioner would be foolish enough to want to see Green Belt protection removed or undermined Green Belt status of our Parish?

It is factually incorrect to consider that a Neighbourhood plan diverts development pressure TO Stanton Drew and in some way removes Green Belt status. That is not possible. The plan has to align with the B&NES local Development Plan and national planning policy inscribed in the NPPF (National Planning Policy Framework). So, even if the Parish wanted the team to draw up a plan to take us out of the Green Belt it would NOT pass examination by the Planning Inspector i.e. it would NOT be legally possible.

BANES options document states....

3.12.2 For villages included in the Green Belt additional residential development is constrained to limited infilling only. Through the Local Plan an assessment will be undertaken

to determine whether the villages currently included in the Green Belt still meet the NPPF criteria (NPPF, paragraph 140 states: "If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.") or whether any of them should be removed from the Green Belt.

3.12.3 It is intended that this assessment is published alongside the Draft Plan, and should it be recommended that one or more villages are removed from the Green Belt 'inset boundaries' would be defined. The inset boundary to be defined will be influenced by the preferred spatial strategy i.e. whether some growth of a settlement within the Green Belt is necessary and exceptional circumstances having been demonstrated.

So, we keep our much-valued Green Belt status until such time a Government comes into power who eradicates it. That would be disastrous.

It is demonstrably incorrect that Stanton Drew is 'off the radar' for development when you look around the village and count the number of new houses, annexes, agricultural buildings, extensions that have been built in the last five year...think, count. It is also naïve to think land agents such as Gladmans do not know we exist. They do, as any large landowner should be able to tell you, but they know we are a Green belt parish.

For a Neighbourhood Plan to go through examination and to pass, it needs to demonstrate it has a sound **evidence base**. The Site Options Long List (SOLL) is part of this evidence base. (Hopefully the Parish Council has read it thoroughly, and in particular the introduction which clearly sets out the purpose of the SOLL). It is part of the evidence that clearly identifies the Plan cannot offer up any sites for development BECAUSE of the Green Belt protection and other site related factors accordingly.

It is good practise to take a sequential approach when looking at sites, guidance in the National Planning Policy Guidance (NPPG) highlights the need to do a criteria-based site assessment especially because if site allocations are devolved locally to neighbourhood plans this can prevent vested interests allocating land for 'pecuniary' reasons. A dodgy process will not pass examination, or the local planning authority (LPA), which has a right to reject a plan whatever the examiner says. The SOLL shows very openly what was assessed.

It should be noted that a neighbourhood plan for an area within the Green Belt CAN NOT allocate more land for development than what the LPA's local plan is proposing for that area, as this would be contrary to existing national strategic policy. However, a neighbourhood plan may have a policy setting out how they would like an allocation in the Green Belt should the LPA be so minded in their forthcoming plan. Stanton Drew has no LPA allocations and the Draft NP makes no suggestions of allocations in the policy.

It is not unusual for Green Belt villages to look at sites in the process of creating a NP, some (see Little Aston in Lichfield and Effingham Neighbourhood Plans) have sought to use a NP to parallel preparation of a local plan to enable the NP to reserve land for housing growth (and to establish the key development principles), on the assumption that the Local Plan would release the land from the Green Belt.

However, it is also not true to suggest that because land is looked at via an evidenced sequential process (SOLL) that it changes in any way the overall assessment of that land in planning terms.

For example, in preparing one NP the community has gone to great lengths to show the authority that there is a more sustainable solution to planning for the same scale of housing growth required in its area as the emerging Local Plan. It has sought to show that by a careful redrawing of the Green Belt boundary on the edge of its two villages (using land that has been assessed as performing only a moderate role to the essential purposes of the Green Belt) it can avoid any significant single land release elsewhere or the 'town cramming' that will result from the authority's preferred strategy to allocate scarce open spaces in the dense urban area for housing development. This has not been

successful, and the neighbourhood plan has been delayed more than a year as the community tries to find a compromise with the authority, which fundamentally disagrees that the neighbourhood plan should play any role in this matter at all (quoting the NPPF).

In a second case two adjoining communities preparing separate but co-ordinated neighbourhood plans to show their authority that there is a more sustainable way of planning for very major housing growth in the Green Belt than was proposed in the Draft Local Plan. The communities are making compelling arguments for a spatial strategy that will deliver the same number of homes, but in a way that reduces the loss of Green Belt and uses Neighbourhood Development Orders to set a design code for managing some parts of the strategy. The communities know that, at present, only the Local Plan can make the final decision on land releases and so are using their neighbourhood plan evidence bases, and strong community support, to persuade the authority to change its strategy in the final Local Plan.

However, more generally, as a Neighbourhood Plan cannot seek to allocate areas of land for development within existing Green Belts (as stated above, this is a role for LPA through the Local Plan) NPs more commonly create a set of policies which will allow homes and businesses to develop in reflection of local needs and hopes. Emphasis is often placed for example on the type of housing required, environmental considerations and conservation of the character of our area. The policies in Stanton Drew's Draft Plan do this very well.

Quite common and what LPAs do:

https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/helaa_options_consultation_compressed.pdf

Cllr Waller is concerned that the NP Team sort to change the Housing Development Boundary and thus Infill rules, that is incorrect. B&NES issued an authority wide consultation concerning Housing Development Boundaries as part of the LPA Development Plan review, consulting with Parish Councils as statutory consultees. The Parish Council consulted with the Parish through the Parish Magazine and held two consultations for parishioners to make their responses. (This will be minuted in parish records). In addition, the PC asked the NP team to consult. The Parish Council responded to the LPA consultation. No changes were asked for and, as is evident if Counsellors look at Parish Online, there have been no changes to the HDB and thus Infill Policy as requested.

The Housing Needs Survey is a part of the evidence base. At the start of the process some five years ago the Parish Council was told it did not need to commission a survey, however, as Neighbourhood plan began to mature and plans elsewhere in the country were being challenged we were instructed by B&NES that we should commission a survey by a reputable company, which we did. The company presented the report in a completely acceptable format. Worcester also presented the results in public. Any perceived construing of lack of transparency is incorrect.

The 'old' Parish Council members on the NP team hope that this helps to inform the new PC and hope very much that clarity has been brought to Cllr Waller's concerns. We hope that the new PC value the many, many months of hard, unpaid and often thankless work we and the NP team did to bring forward the Parish's wishes through the Plan and to conserve and enhance our Parish for future generations in perpetuity.

On behalf of the Neighbourhood Plan team, thank you for taking time to consider this response.

Judith Chubb-Whittle MA.

