

| Question Number and Response | <p style="text-align: center;">AVAG's Explanation of Questions & Suggested Responses:</p> <p style="text-align: center;">* For further information check out albrightongreenbelt.co.uk</p> <p style="text-align: center;">** please use your own words - rather than copy and paste</p> |
|---|---|
| 1 - No 2 - No 3 - No 15 - No 16 - No 17 - No | <p>Proposed Increased Housing Numbers in Rural Areas.</p> <p>We do not believe that the proposed new method of calculating housing numbers in each area (the new 'standard methodology') is right.</p> <p>a) These would significantly <u>increase</u> housing numbers in rural areas; where there is productive farmland, natural landscapes and wildlife habitats which prevent urban sprawl. These areas are not suitable for disproportionate overdevelopment and significant additional houses. They are not as sustainable as urban areas as they will require additional infrastructure, services and facilities to support them.</p> <p>b) The new standard methodology would <u>reduce</u> housing numbers in urban areas - which urgently need High Streets to be rejuvenated and regeneration of brownfield wastelands.</p> <p>These areas are more sustainable and have services, facilities and infrastructure to cope with the additional housing.</p> <p>Affordability Ratio.</p> <p>One of the reasons for the proposed significant increase in housing numbers in rural areas is that the new 'standard methodology' uses an new affordability ratio which is adversely affected by the combination of lower earnings in rural areas AND higher house prices. We believe that the existing affordability ratio multiplier should be kept</p> |
| 7 - No 9 - No | <p>5 Year Housing Supply.</p> <p>Councils should not <u>continually</u> have to demonstrate 5 years housing supply, regardless of plan status. An unintended consequence of the wording of the proposals (e.g para 76) is that councils who are positively progressing their Local Plans seem to be penalised; which is unfair and damages the plan making process. Councils should not have to include an additional 5% buffer on top of the 5 year housing supply especially when they consistently deliver on their housing targets.</p> |
| 20 - Yes | <p>Brownfield sites <u>must</u> be prioritised for new developments with planning applications approved in these areas; instead of encroaching on rural or greenbelt areas.</p> |
| 21 - No 23 - No 24 - Yes | <p>Grey Belt: Previously Developed Land (PDL) in Green Belt must be carefully defined so that:</p> <ul style="list-style-type: none"> - The definition of PDL stays the same as it currently is - ONLY the land that has been <u>previously developed</u> should be removed from Green belt and classified as Grey Belt - and no more than this or into surrounding Green Belt - References must be maintained so that appropriate redevelopment of land must not have a "greater impact on the openness of the Green Belt" <p>Grey Belt Land:</p> <ul style="list-style-type: none"> - MUST not extend beyond PDL - MUST not include 'poor performing' Green Belt land |
| 25 - No 26 - Yes | <p>Green Belt: Land which makes a limited contribution to purposes of Green Belt.</p> <p>We believe that the proposed new definitions are poorly drafted. There is a significant difference between land that makes a 'limited contribution to Green Belt purposes' and land which 'does not perform strongly against Green Belt purposes'. The NPPF must make this clear so that Green Belt is protected and not undermined by developers.</p> |
| 28 - No 29 - No | <p>Green Belt: Release of Green Belt Land:</p> <ul style="list-style-type: none"> - Must have consideration of the ability to access services, facilities and sustainable transport. - Must not undermine the function of the Green Belt within the plan area <u>as a whole</u> <p>The NPPF should be reworded to explicitly include these</p> |
| 30 - No | <p>Green Belt: Allowing development on the Green Belt through decision making.</p> <p>The wording about 'demonstrable needs of local, regional or national importance' could have unintended consequences and is vague and open to interpretation. There is a risk that favouring "grey belt" within the Green Belt over areas outside the Green Belt could undermine a plan-led approach, resulting in poorly designed, unsustainable developments lacking access to services and infrastructure.</p> |
| 43 - Yes see underlined | <p>Green Belt: Golden Rules for release of Green Belt land. <u>We consider that the "golden rules" should apply to any Green Belt release that occurs, not only to "new" Green Belt release as suggested in the proposal.</u></p> |
| 82 - No 83 - Yes see underlined | <p>Availability of Agricultural land for food production; Explicit wording referring to the importance of considering agricultural land quality when determining appropriate site allocations must be retained in the NPPF.</p> <p><u>We suggest reinforcing the wording in the document to say that agricultural land, defined as grades 1-3a, is not suitable for development, regardless of any other sustainability criteria.</u></p> |
| 103 - No see underlined | <p>Local Plan Transitional Arrangements.</p> <p>To review Local Plans in line with the proposed transitional arrangements risks devaluing and undermining the plan-led approach to development. This is because immediately after adopting the Local Plan there would be a requirement for them to be reviewed. This will negatively impact on the status and value of the Local Plan, reduce trust and engagement with local communities in the Local Plan process, increase resources to implement the Local Plan, affect confidence amongst developers and investors, and damage planned and sustainable development.</p> <p><u>We do not agree with the proposed transitional arrangements and propose that the transitional arrangements are amended to provide certainty on the status of soon to be adopted Local Plans, and that any review of the Local Plan should be completed within five years.</u></p> |

