

<u>Chobham Neighbourhood Plan 2024 to 2038 Submission Version</u> Representations on behalf of Kingsbury Investment & Development Group

Policy CH1: Location of Development

In the absence of any specific housing allocations in the Neighbourhood Plan, Kingsbury Investment & Development Group broadly supports the approach taken to the location of development in Policy CH1, recognising as it does, the opportunities presented by sites outside the main settlement boundary.

While Kingsbury Investment & Development Group is also supportive of the way in which the Policy gives recognition to proposals within the Green Belt that meet either the exceptions to inappropriate development in the Green Belt, or demonstrate very special circumstances, as set out in the National Planning Policy Framework (NPPF) (December 2024), it is nevertheless considered that the Policy could be more explicit about the status of 'grey belt' land in the development management process.

There is only one reference to grey belt land in the Neighbourhood Plan, and this is at paragraph 4.7, which states that there may be scope in the future for grey belt sites to be identified, although this would be undertaken as part of a Green Belt review by the local planning authority. This implies a longer term approach to the consideration and release of grey belt sites.

In the context of the emerging Local Plan objective to make provision for the delivery of at least 5,578 new homes in the Borough over the plan period, such sites can make a valuable contribution to the provision of housing land. Typically, these areas currently don't have significant levels of biodiversity and are not used for public enjoyment. Releasing these sites, or providing a framework for them to come forward through the development management process, will help to balance the provision of housing across the Borough.

The short-term release grey belt land will greatly assist in the Government's objective to significantly boost the supply of housing (paragraph 61), and support efforts to build 1.5 million new homes before 2029. By following the 'Golden Rules' (paragraph 156 of the NPPF), communities will benefit from the release of grey belt land through the provision of enhanced levels of affordable housing, necessary improvements to local or national infrastructure, and the provision of new, or improvements to existing, green spaces that are accessible to the public.

As such, Kingsbury Investment & Development Group object to Policy CH1 in its current form. It is suggested that the Policy CH1 2) a) be amended as follows:

"...proposals must meet either the exceptions to inappropriate development in the Green Belt, **including the utilisation of grey belt land,** or demonstrate...."