

About this Consultation

The Catshill and North Marlbrook Parish Neighbourhood Plan was submitted to Bromsgrove District Council on 8th January 2021. The District Council is satisfied the Neighbourhood Plan is in accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and is therefore publicising the plan proposal and inviting representations as part of its obligation under Regulation 16 of the above regulations.

It is preferred that you make your representation on this representation form (although other responses will be accepted). It is important to specify which part of the neighbourhood plan (by page and/or paragraph and/or policy number) you are commenting on. The representation period is open for 6 weeks from:

Thursday 25th February 2021 to Thursday 8th April 2021

Where to view the Documents

During the dates of the representation period, the Catshill and North Marlbrook Parish Neighbourhood Plan as well as a Consultation Statement and Basic Conditions Statement can be viewed online at www.bromsgrove.gov.uk/cnmnp or on the Parish Council Neighbourhood Plan website at <http://catshillandnorthmarlbrookplan.org.uk>

Appendices comprising the evidence base to support the plan can be viewed on the Parish Council's Neighbourhood Plan website.

How to Respond

You can make representations by responding using the following methods:

 Email	strategicplanning@bromsgroveandredditch.gov.uk
 Post	Strategic Planning – Bromsgrove District Council Parkside Market Street Bromsgrove Worcestershire B61 8DA

Data Protection

The information collected will be processed in accordance with the Data Protection Act 2018. Information from the forms will be stored on a computer database used solely in connection with the Catshill and North Marlbrook Parish Neighbourhood Plan. All representations received by the District Council will be sent to the person appointed to undertake an independent examination into the Catshill and North Marlbrook Parish Neighbourhood Plan, specifically whether the plan is deemed to meet the 'basic conditions' set out in Schedule 4B para.8(2) of the 1990 Town and Country Planning Act.

Any representation may also include a request to the District Council to be notified of the local authority's decision on whether the neighbourhood plan is to be 'made' in accordance with Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended). **Please make this request using the question/answer box on p.3 of this representation form.**

Privacy Statement

Who is collecting this information

This information is being collected by Bromsgrove District Council.

Why we collect and use this information

We are collecting this information for the purpose of carrying out a statutory representation period on a plan which may become part of the Council's statutory development plan. We are processing this information under the same legal basis.

Storing this information

We will keep your personal data until the plan has been 'made' or until such time as you request to be taken off the database prior to this. It will be used only for the purpose stated and will not be shared or sold.

Data collection requirements

We may need to share the information that you give to us with an independent examiner as part of a legal obligation in the neighbourhood plan making process, but the information will not be used in any profiling/automated decision making.

Further information

If you would like further information about this privacy notice, please contact the Strategic Planning Team at strategicplanning@bromsgroveandredditch.gov.uk

Catshill and North Marlbrook Parish Neighbourhood Plan Regulation 16 Response Form

Your contact details:

Name	Michael Davies
Organisation (if applicable)	Savills
Representing (e.g. self or client)	Landowners at land bound by Woodrow Lane and Halesowen Road, Catshill
Email Address	mpdavies@savills.com
Postal Address	Savills, 55 Colmore Row, Birmingham, B3 2AA
Telephone Number	07967 555548

Would you like to be notified of the local authority's decision on whether this neighbourhood plan is made, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended)?

(If Yes, please ensure your contact details are provided above)

Yes

No

Section 1: Background

Do you have any comments to make on 'Section 1: Background' of the Catshill and North Marlbrook Parish Neighbourhood Plan?

Section 2: The Vision

Do you have any comments to make on 'Section 2: The Vision' of the Catshill and North Marlbrook Parish Neighbourhood Plan?

Para 6.3

This paragraph acknowledges that the modest gap between Bromsgrove and Catshill has become vulnerable because of recent and planned developments to the northern and western edges of Bromsgrove. We consider that the risk of coalescence between the southern part of Catshill and Bromsgrove lends support to alternative parts of Catshill being considered more favourably for development.

Therefore the case for development to the north of the Parish appears to be stronger than the case for development in the south. In particular support for this approach is found in Bromsgrove's Phase 1 Green Belt Review which states that parcel C1 has one of the weakest contributions to Green Belt of all parcels assessed.

Para 6.6

We note that principle 3 refers to avoiding over reliance on a single large site for housing purposes. Whilst it is sensible to allocate a range of sites for development, large sites should not be dismissed in such a way. Comprehensive development of a large site can provide "economies of scale" in order to provide robust contributions to local services and support the viability of shops and services nearby through the location of a critical mass of new residents. This has the ability to benefit both existing and new residents in the Parish.

This also links to principle 4. It should be investigated whether, through the addition of development that new shops and services better located to serve the development may become viable. A snapshot of today's position on these matters should not be taken as a reflection of potential future changes.

Para 6.9

We support the Parish Council's position that Site 21 is selected as an initial location for further consideration. We note that the Parish Council has sought to calculate the housing need based on dividing the excess requirement (2,300 dwellings) for the six large settlements between them. Even though work has been undertaken by AECOM at the Parish level, a wider consideration of Bromsgrove District's housing needs is required before conclusions on housing numbers can be reached.

In addition, further consideration is required for the creation of a permanent, defensible Green Belt boundary. This would not be created if Site 22 was developed without the addition of site 21. Furthermore, in landscape terms, if site 21 was not developed its landscape value would become very low if it was bordered by development

coming forward on site 22. We consider that site 21 and site 22, as shown at appendix A of these representations should both be released for development.

Figure 4

Please note that the boundary between site 21 and 22 has been drawn incorrectly. We have submitted these representations on behalf of the landowners at site 21 and the northern portion of site 22. We have attached a Site Plan submitted with representations we made to the Regulation 14 consultation stage. It should also be noted that this same site red line area was submitted as part of the Bromsgrove call for sites exercise in 2019 and Neighbourhood Plan call for sites exercise in 2018. We have attached these submissions again for reference along with a copy of a letter addressed to Phillip Sharp stating our apologies for not attending the presentations for those sites considered within the Neighbourhood Plan call for sites exercise, but expressing our willingness to engage in further consultation with the Parish Council as work on the Neighbourhood Plan progresses.

Para 8.2.7

We note that reference is made to the 379 homes per year figure derived from review of the standard methodology and its implications for Bromsgrove. Consideration will also need to be given to the recently revised version 2 of this standard methodology which requires a 35% uplift for large cities such as Birmingham and Wolverhampton. It has already been demonstrated through currently adopted and emerging plans that these locations cannot accommodate additional growth within their Local Authority boundaries.

This could result in the need for a review of Bromsgrove's need and ultimately that of Catshill and North Marlbrook. This important consideration should be noted within the Neighbourhood Plan. This means that sites in low performing Green Belt parcels such as land bound by Woodrow Lane and Halesowen Road should be released for development.

Para 8.5.1

We support the statement made at paragraph 8.5.1 that: "... Respondents also favoured housing being spread across a number of small sites across the Parish. Unfortunately, such an approach would limit developer contributions and significantly reduce provision of affordable homes and also conflict with residents' desires for improvements to infrastructure and services." This is backed up the NPPF which does not require the provision of affordable housing on sites of 9 dwellings or fewer. We consider that the comprehensive development of sites in the Green Belt ensures they can be sympathetically developed and create a critical mass of development and new residents to ensure improvements to services in the parish for current and future residents.

Para 8.5.3

We have concerns with the fact that as identified in paragraph 8.5.3 that the AECOM produced work for the evidence base did not take into account Green Belt or impact on traffic. We agree with AECOM's stance that Green Belt release must be considered by the District Council through their assessments. However we request clarity on why traffic impacts were not assessed during the site selection process. Until both of these pieces of work are undertake we question the validity of the evidence base findings that back up the site assessment process.

Para 8.5.5

Paragraph 8.5.5 states that: "AECOM concluded that some sites could not be allocated if there was no information to suggest they were available for development. The outcome of the BDC 'Call for Sites' exercise means that this could have led AECOM to take a different view. However, it is also apparent that constraints on many of the sites means it is [*sic*] less likely that its overall assessment would have changed significantly."

We do not consider that this statement should apply to site 21. Information has been provided to both the district council and parish council call for sites exercises and the recent Regulation 14 consultation evidencing that the site is immediately available for development.

Para 8.5.9

We acknowledge that paragraph 8.5.9 supports allocation of site 21 for development in the “longer term”. We disagree that this development is to come forward in the “longer term”. The site could come forward in a comprehensive manner alongside land under consideration at site 22. Where site 22 is released in advance this will have a significant effect on the landscape characteristics and Green Belt scoring.

Section 8.9

We support the principle of good quality design contributing to the overall sustainability of development. However we disagree that the best way to achieve this is always through the use of a design code. It should be made clear that a design code is in place to provide assistance on what is good design in a wide context, but cannot provide clarity on what is considered acceptable at a site specific scale. Even though the Design code is at a Parish level, this is not fine grain or detailed enough to provide site specific details. It should be acknowledged that matters of detail, of which design is one, should be considered at the planning application stage and more specifically through a reserved matters application.

Section 3: Neighbourhood Plan Policies

Do you have any general comments to make on 'Section 3: Neighbourhood Plan Policies' of the Catshill and North Marlbrook Parish Neighbourhood Plan?

More specifically, do you have any comments on individual policies within the policy topic areas?

Topic 1 – Housing and Infrastructure Policies

Policy H1

Criterion 2a i requires revised Green Belt Boundaries to be defensible. We consider that site 21 and site 22 should be favourably assessed for their ability to provide a new enduring, defensible Green Belt boundaries should they both come forward for development. This policy requirement is supported by NPPF Paragraph 139 f) which states that Green Belt boundaries must be defined clearly, using physical features that are readily recognisable and likely to be permanent.

Local communities can play an important role in identifying where new development could be delivered. In order to meet the District and HMA's housing need, Green Belt release is required. As set out in paragraph 136 of the

NPPF, Strategic Policies should establish the need for any changes to Green Belt boundaries. It is therefore fundamental that the Bromsgrove District Plan Review deals with Green Belt release. It is recognised in NPPF paragraph 136 that where strategic policies have established the need for changes to Green Belt boundaries, non-strategic policies, including Neighbourhood Plans, can make detailed amendments to those boundaries. The Local Plan Review has an important role in identifying where development should be located and providing a clear steer to the Parish.

Policy H2

This policy should be amended to include acknowledgement that the mix of dwelling types is something that should be considered on a site by site basis, rather than a blanket mix being imposed across all development.

We note the recommendations made by AECOM with regards to household needs. Which concludes the following types of houses are required in the area:

- One bedrooms: 7.2%
- Two bedrooms: 39.5%
- Three bedrooms: None
- Four bedrooms: 33.2%
- Five bedrooms: 20.1%

We welcome the fact that the study considers what is required at a parish level, however greater consideration needs to be taken into what those new to the parish from outside may require and how this is provided on a site by site basis. There should not be a blanket requirement for each site irrespective of other considerations.

We object to there being no requirement for the provision of three bedroom homes. There is no rationale to require over two thirds of homes to be two and four bed, but not require three bedroom homes.

AECOM's report also advises to promote the delivery of bungalows and apartment to cater for an elderly population, We disagree that bungalows are only way to deliver accommodation for older people. This could include the provision of maisonette dwellings to enable delivery of first floor and ground floor accessible dwellings, whilst ensuring suitable density is maintained. We consider that any requirement to provide bungalows is unduly restrictive and onerous unless there is evidence that demonstrates at a site specific level that the provision of this type of dwellings is appropriate.

Topic 2 – Commerce and Community Policies

Topic 3 – Environment Policies

Policy ENV2

In principle we agree with the Plan position on requiring comprehensive landscaping proposals. However it is not clear from the wording of the policy at which stage this would be required. Such detailed matters should not be required to be considered at the Outline planning application stage. Rather landscaping is a reserved matter

subject to consideration at the detailed stage. Matters such as landscaping are site for site specific consideration and should not be unduly influenced through a design code.

Policy ENV3

We object to the requirement to connect to the ecological sites identified. Firstly it is unclear what ecological evidence base has been produced to support the designation of these sites. Secondly, we question the ability for every development site across the Parish to suitably connect to all of the sites listed.

We consider that it should be aspiration, rather than a requirement to connect to such sites. Consideration should be given to this at the planning application stage when detailed ecology works would have to be undertaken on individual sites.

Policy ENV4

We note that a range of Local Green Spaces are identified by the Neighbourhood Plan. Policy ENV4 states that development must not detract from the openness or special character of a Local Green Space. We request clarification on what is meant by this and the requirements that would need to be met in any future planning applications to be determined in accordance with the Plan when made.

Policy ENV7

We consider that the designation of significant views as highlighted on the Policies Map should be clear that it does not sterilise development at locations across the Parish. There should be a balancing exercise during the Plan production process between the successful and viable delivery of development sites and the designation of significant view status and its implications for development in that location.

Policy ENV8

Whilst we support in principle the introduction of measures to increase sustainability in developments, we consider that placing a requirement to achieve zero or very low carbon emissions is potentially onerous, if policy is not worded to reflect building regulations requirements.

Section 4: Community Actions

Do you have any comments to make on the 'Community Actions' section of the Catshill and North Marlbrook Parish Neighbourhood Plan?

Section 5: Implementation, Monitoring, Review and Revision of the Plan

Do you have any comments to make on the 'Implementation, Monitoring, Review and Revision of the Plan' section of the Catshill and North Marlbrook Parish Neighbourhood Plan?

Para 12.3

We agree with the position set out at paragraph 12.3 which states that a full review of the Neighbourhood Plan will be undertaken every 5 years (or sooner if circumstances warrant). We consider it useful to set out the purpose

of these reviews, but that the triggers for such a review should be explicitly stated within a policy in the plan. For example two key triggers for a review of the plan should be considered in relation to Bromsgrove's housing requirement position providing the parish with a housing figure to base allocation policies on and linked to this progression of the Bromsgrove Green Belt review, in particular the stage 2 document which will seek to review the Green Belt credentials of specific sites.

Other Comments

Do you have any other comments on the Catshill and North Marlbrook Parish Neighbourhood Plan, including appendices and other supporting documents which accompany the plan?

Representations were submitted to the regulation 14 consultation on behalf of landowners at Land bound by Woodrow Lane and Halesowen Road, Catshill. We have review the representations published and analysed in section 6.7 of the consultation statement entitled: "summary of responses received during Regulation 14 consultation stage. There is no reference to these representations having been submitted and in turn no analysis of their impact of the submission version of the plan. We request that the consultation statement is updated to reflect the representations submitted and any required changes made to the submission plan as proposed modifications for consideration by the examiner.

As it appears that these representations have not been considered, we have repeated many of the points made at the Regulation 14 consultation stage, as many of these points are still relevant to the submission version of the Plan.

We have attached evidence of the representations having been submitted and accepted by the Parish Council for consideration within the consultation. We would welcome a formal response from the Parish Council on how these representations were taken into consideration in the consultation. We consider to comply with the Neighbourhood Planning (General) Regulations 2012 (as amended) and guidance in the Planning Practice Guidance (PPG) at Paragraph 049, reference ID: 41-049-20140306 that the consultation response that was duly made by landowners of a site reviewed by the Neighbourhood Plan should be given due consideration in the consultation process.

Basic Conditions Statement

At Section 1: Introduction, it is stated that: “NP will run from period 2021 – 2030. The later date being chosen to keep the NP in line with the current Bromsgrove District Council Core Strategy time period”. It is incorrect to refer to a core strategy, this should instead refer to: “Bromsgrove District Plan 2011 -2030”.

We support acknowledgement that Bromsgrove is undertaking a plan review and that one of the main purposes is to identify land needed to meet the District’s housing targets which has necessitated a review of areas of designated Green Belt. This is key influence on the make-up of the Neighbourhood Plan.

Table 3 on page 10 summarises the results of an assessment of sustainability of the policies proposed. We disagree with the assessment of policy H1 that it would only have a “positive” impact on social factors. We consider that the policy should be considered to provide “very positive” social factors, in the same way that this policy is considered to provide “very positive” economic factors. Social factors around affordability of housing, housing choice and the sustainability of shops and services should be considered when assessing the social factors at play.

