



CLAREMONT

PLANNING CONSULTANCY

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B61 8DA

By email: strategicplanning@bromsgroveandredditch.gov.uk

29 March 2019

Dear Sir or Madam,

REPRESENTATIONS TO THE REGULATION 16 CONSULTATION OF THE LICKEY & BLACKWELL AND COFTON HACKETT NEIGHBOURHOOD PLAN

Claremont Planning are instructed on behalf of our client, Spitfire Bespoke Homes Ltd, to make representations to the emerging Lickey & Blackwell and Cofton Hackett Neighbourhood Plan. Claremont Planning made previous representations to the emerging Neighbourhood Plan in Summer 2018 where it was emphasised that the land under the control of Spitfire Homes off Cofton Lake Road is available and suitable for residential development.

The site remains a logical and deliverable location for residential development (as illustrated in the attached masterplan at Appendix 1) that will not materially harm the Green Belt or to the local landscape of Cofton Hackett. The location of the Cofton Lake Road site close to the boundary of Birmingham City should also be favourably considered in respect of the cross-boundary housing pressures arising from the wider housing market area. As such, these representations will make continued argument in favour of the site's consideration as a location for residential allocation and development.

The Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan

The Neighbourhood Plan area covers both Lickey and Blackwell Parish and Cofton Hackett Parish, with the two areas together covering an area that borders the fringe of the built-up edge of Birmingham to the north, extending south towards Burcot with Bromsgrove Town beyond. The Neighbourhood Plan proposes to extend over a plan period to 2030, in line with the current Bromsgrove District Local Plan but does not account for the proposed review of the Local Plan. This will mean that any resulting neighbourhood plan will need further review before the end of the Local Plan period, which should be facilitated through the policy of the plan alongside regular 5 year reviews.

Preparation of the Plan began in 2013 with informal public consultation and scoping exercises as conducted between 2013 and 2015, to include resident questionnaires in April 2014 and

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the Summer of 2015. Further informal consultation events took place in October 2016 and June to July 2017. In Summer 2018 the draft Plan was published for Regulation 15 Consultation at which time Claremont Planning made representations on behalf of Spitfire Bespoke Homes Ltd. This consultation closed in on 16 July 2018.

Subsequent to the completion of the consultation, Bromsgrove District has maintained their satisfaction with the Neighbourhood Plan and have agreed to hold a Regulation 16 Consultation prior to the Plan's submission for examination. As such, Claremont Planning, on behalf of Spitfire Bespoke Homes Ltd, advance that the site off Cofton Lake Road continues to be available and should be considered through the emerging Neighbourhood Plan to achieve sustainable and logical residential development.

It should be noted that the Vision of Submission Draft of the Neighbourhood Plan, whilst in line with the objectives of the Plan and underpin the Vision, is erroneous in the timeframe that has been applied. The Vision denotes its application from 2018 to 2038, which does not correspond with the current Local Plan period to 2030 or the various timescale options considered through the recent Issues & Options consultation for the Local Plan Review. To bring the Neighbourhood Plan forward without the Local Plan Review being in place a review process for the Neighbourhood Plan should be set in place. In the first instance however, this timescale is unjustified and requires modification. Claremont Planning maintain therefore that the Plan requires amendment to ensure that it is legally compliant and fully accurate to ensure its implementation as part of the Development Plan can be realised.

The significant extent of the Green Belt designation which covers the Parishes is a primary consideration and theme of the emerging Neighbourhood Plan. As such, a number of Objectives of the Plan provide specific focus on the maintenance and preservation of the Green Belt across Lickey and Blackwell and Cofton Hackett. It is maintained however, as it was through previous representations submitted to the emerging Plan, that the Neighbourhood Plan cannot seek to maintain the Green Belt when a strategic review is underway. Indeed, it is considered that with respect to Green Belt, the proposals of Objectives 1 and 2 rest solely with the District Council, with a high-level Green Belt review underway in a way that will facilitate Objectives 4-6. The favourable stance posed by objectives 4 – 6 is supported however, providing the opportunity for sustainable development to be delivered.

Given that the Green Belt significantly constrains the development potential of the Parishes, it must be acknowledged that a review of its extent is justified and necessary both to deliver District needs and specific housing requirements of the parishes. As such, the emerging Neighbourhood Plan should practically and logically engage with such a Review opportunity, rather than frustrate its purpose with overly-protective policy. The national designation and purpose of Green Belt should be sufficient to safeguard it from development; with Neighbourhood Plan policy more suitable to demonstrate circumstances where by development within the Green Belt would be acceptable. It is advanced that the Neighbourhood Plan must remain in a position to ensure that due consideration is given to opportunities to deliver sustainable development within the Parishes, including consideration of sites such as those under control by Spitfire Bespoke Homes Ltd.

The Neighbourhood Plan Review is being prepared alongside the review of the adopted Development Plan, meaning that a mechanism should be included to allow for its review to reflect the updated Development Plan. Protracted delays in updating the Neighbourhood Plan to accommodate such policy changes should be avoided and therefore **Paragraph 5.4** should include reference to a maximum 12-month timetable to facilitate the update of the

Neighbourhood Plan. Failure to provide an updated plan or appropriate timescale for its review would mean that there would be a policy gulf that would allow an “unplanned environment” to proceed.

“5.4 The implementation of the NDP will be monitored on a regular basis by the Parish Councils. There will be a full or partial review of the NDP following the completion of the Green Belt Review which will be undertaken by approximately 2023, and the subsequent adoption of the Local Plan review,”

Landscape Considerations

A significant aspect of the Green Belt is the landscape value that is afforded to it through the intrinsic and unequivocal importance of the open countryside in ensuring separation between settlements. This is a core theme of the Neighbourhood Plan which emphasises that valuable landscapes within the Parishes such as the Lickey Hills and associated moors will be protected. This should seek to enhance the importance of the Green Belt across these valued areas of the Parishes. Providing such protection however will not discount the opportunity to appropriately extent existing settlements and deliver appropriate levels of development.

To support the preparation of the Neighbourhood Plan, a Character Appraisal document has been prepared for each Parish. At present, only the Cofton Hackett Appraisal has been published as a final version, with the Lickey and Blackwell document only at draft stage. The Cofton Hackett appraisal is split into 13 sections which address particular notable landscape character areas and assess them in terms of their assets, value and their features. The promoted site at Cofton Lake Road, under the control of Spitfire Bespoke Homes Ltd, falls within the “The Stocken Area,” which is the area between Groveley Lane and Cofton Church Lane. Whilst the area commands some wide and undeveloped spaces, the immediate landscape is significantly affected by built form through piecemeal development from the early 20th century and housing development from after the Second World War.

The site at Cofton Lake Road is identified in the appraisal as an area of “Significant local open or green space” that wraps around Cofton Reservoir. However, the area identified as open space is partly within private ownership and has no public access to large sections of it. Indeed, the existing Public Rights of Way extend alongside the reservoir and extend around the space rather than providing routes through. As such the contribution of the area to a local open space definition is limited. Extensive Views are available further south but not from the defined open space directly, limiting its contribution and value. In addition, the context of the Reservoir is predominantly urban with three sides bounded by residential dwellings that are located on an elevated hillside position to overlook the reservoir. Overall, the area’s character has change substantially, with the development at Longbridge, Cofton Grange, extending the building line beyond the far southern boundary of the site. The assessment of the adjacent field as being a significant open space is therefore mistaken, particularly in the context of the wider valley to the south. Correctly, this landscape classification has not been incorporated into the Neighbourhood Plan, but the evidence base that is relied upon is not appropriate.

Housing Delivery

Objective 4 of the emerging LBCH Neighbourhood Plan provides the fundamental basis for how the emerging Plan will approach housing development in the Parishes. The entire Neighbourhood Plan area is washed over by a Green Belt designation and therefore significantly limits the extent of growth which can occur within the villages in the designated area. Whilst this ensures that that openness and value of the countryside is preserved, it does

not allow for fully appropriate levels of growth to be delivered and therefore prevents sustainable levels of development. This, in turn, impacts on the long-term vitality of settlements such as Cofton Hackett, economically and socially.

Housing, as a key issue on page 21 of the emerging plan whereby it states that;

...it is likely that some small-scale infill development may come forward over the Plan period and the NPD supports this subject to certain criteria."

Claremont Planning support this approach by the Neighbourhood Plan, it ensures that development can be executed within the existing settlements to a point that does not harm those said settlements. But it does not go far enough in meeting the true needs of the residents and for the aspirations of Bromsgrove District. The limitation of development sites to 'infill' opportunities and of a small scale are limiting factors, particularly in the context of Cofton Hackett where opportunities to provide infill development have already been maximised. Instead the policy should include edge of settlement expansion areas to ensure the policy is worthwhile and can be practically applied.

Where the plan states in **paragraph 8.16**; *There was no demand for the NDP to identify site allocations for small scale new housing development*, this is in direct contradiction with the aspirations as set out on page 21, which states that it will "encourage developers to deliver smaller homes". Given that viability is a central issue for developers to ensure deliverability of sites, this requirement of the Plan should not be applied comprehensively however, instead ensuring that the right development occurs on sites. The application of an inflexible housing mix policy is not conducive to housing delivery and contradicts the advice of the NPPF.

Given that Bromsgrove District Council acknowledges through the Local Plan Review consultation that there is a District wide shortfall of at least 2,300 homes, there is a substantial pressure on the delivery of housing across the District as a whole. Whilst it is not the Parishes' statutory obligation to determine how much they should contribute to this need, there is an onus on them to meet local need as well as any allocated need set for the settlement through the Local Plan. This in turn will contribute towards alleviating the housing pressures on the District Council and deliver sites that meet the localised needs that arise across the District Area.

Objectives 5 of the emerging Neighbourhood Plan focuses on the requirement that any development must not cause demonstrable harm to existing infrastructure and that adequate demonstration will be required to show that sites are suitable to accommodate development, without causing undue stress or harm to the road network. Through housing allocations and the appropriate testing of applications there are already measures by which infrastructure can be provided for. The Neighbourhood Plan should identify infrastructure requirements but if no development is promoted through the policy then the delivery of infrastructure will also be frustrated, causing the communities to stagnate. For Objective 5 to be truly justified and realistic, the plan should identify a level of development that as a minimum will provide for the infrastructure required. As drafted the policy of the Neighbourhood Plan fails to achieve this.

Development of sites at the edge of Cofton Hackett have the potential to deliver positive contributions, both economically and socially. Investment of developer contributions can be attributed towards the improvement of infrastructure as referred to in **Objective 5**, but also support economic growth locally through the construction phase of the development itself as well as through introduction of an increased population base. **Objective 6** looks to support the ongoing economic vitality of the area and thus without provision of more development within

and on the edges of villages, the ongoing viability of the local services and businesses cannot be supported and the premise of this Objective, realised.

Cross-boundary Pressures

The proximity of Cofton Hackett to the boundary with Birmingham City is a significant consideration that should not be undermined. Within the Neighbourhood Plan, the fact that Cofton Hackett Parish shares a border with edge of Birmingham and the wider conurbation is not discussed at great length or in the context of housing provision in the NDP area; nor is it debated as to how this will impact on the pressure of delivery of such housing in the area over the Plan period.

Cross-boundary pressures is a primary reason as to why the District Council is currently reviewing their Local Plan, given their statutory obligation to meet cross-boundary need, and the fact that the District Council is unable to meet its own need, only compounds the problem of the pressure for housing delivery.

This pressure has been highlighted in the GL Hearn Greater Birmingham HMA Strategic Growth Study which identifies that the need for the entire West Midlands city region cannot be accommodated totally within the urban area, which therefore resulted in a significant proportion of this need to be spread amongst the Greater Birmingham HMA (which includes the West Midlands conurbation and the adjacent districts). The study makes a number of recommendations in how this need can be met within the urban area, but concludes that Green Belt release, as well as new settlements beyond the Green Belt itself, will be required if this need is to be met up to 2036. These findings will have a material impact on how Bromsgrove District is to seek sites for housing delivery and thus in turn, should be a material consideration taken into account within the emerging Neighbourhood Plan. However, as the Neighbourhood Plan has not made appropriate actions in allocating sites within the Parish, the Neighbourhood Plan has failed in its effectiveness in finding options to meet need of the local population, of the wider District as well as the overspill need from the directly adjacent conurbation.

Green Belt and Landscape

As previously highlighted, the Neighbourhood Plan does not make any allocations within the Parish and as Neighbourhood Plans currently do not have the power to review **Green Belt** boundaries, the capacity of the Plan to achieve this is minimal. It is understood that the entire Parish area is washed over by Green Belt, but as the Neighbourhood Plan makes no advances in attempting to seek sites for development, which could be released through the Green Belt Methodology Review of the Bromsgrove Local Plan Review. This therefore undermines the ability of the emerging Neighbourhood Plan to ensure that development is appropriately located within the area that meets the needs of the Neighbourhood Plan and is in compliance with its objectives.

Objective 1 of the emerging Neighbourhood Plan states that “*We will protect the built, historical and natural environment ensuring that our green spaces, and, where possible, the Green Belt are protected,*” this underpins the overarching aim of the Plan and provides inappropriate emphases on Green Belt protection ahead of a Green Belt Review and in the context of the housing shortfall. It is emphasised that given the pressures arising from beyond the Neighbourhood Plan boundaries to accommodate further growth, without the Neighbourhood Plan making any motions towards growth in particular areas, it will not be able to meet this objective. This is compounded by the fact that Bromsgrove District has acknowledged that a review of the Green Belt is required to meet the identified need of the District and beyond.

If edge of settlement sites such as land adjacent to Cofton Lake Road were appropriately considered through the Neighbourhood Plan and identified as a potential growth area, it will allow the Plan to shape future development that is more suitable for the Neighbourhood Plan and for the local area. This in turn will allow the long-term preservation of the value of the Green Belt around Cofton Hackett, particularly given that the promoted Cofton Lake Road area would result in minimal adverse impact on Green Belt functions.

The emerging **Policy NE2 Local Landscape Character**, aims to shape the landscape within the Parish and suggests that areas will be attributed protection in terms of their visual and aesthetic value. The policy identifies the landscape value of the open countryside around the villages within Lickey and Blackwell and Cofton Hackett as important. Claremont Planning contends that the Cofton Hackett Character Appraisal has recognised the promoted site inappropriately as an area of local green space, without taking into account its context of residential dwellings and built form. This evidence base should not therefore be relied upon when considering allocations or applications. Indeed, the site does not hold such significant value that would warrant its protection through local planning policy.

Settlement Suitability

Cofton Hackett is an appropriate location for further development given its position at the very edge of the West Midlands urban area. Its functional, economic and social ties with the City cannot be undervalued, with development at Longbridge clearly visible from the site and the village's associated service base providing primary service centre for residents at Cofton Hackett. These ties will be strengthened by Birmingham City Council's Longbridge Area Action Plan with the development of up to 10,000 new jobs, community facilities and a new town centre nearby. With these linkages, it is therefore logical for further development to be located at the village.

Additionally, an extension to built form at Cofton Lake Road will not cause harm to the open countryside, as is already enclosed and well related to development areas to the east. Development at the Cofton Lake Road Site could establish a logical moderate extension to the village that will reflect the built form already being delivered towards the rail line, rounding off the settlement edge towards the east. Defining a new southern boundary to the settlement at the site will have the potential to limit further development occurring within the open countryside itself to the south, such as at Blackwell and Lickey End, which do not demonstrate such a link to Birmingham City as Cofton Hackett.

The continued inclusion of **Policy BD3 Garden and Backland Development** is objected to as frustrating the opportunities for infill development. This policy inappropriately resists proposals that would increase local density, in line with the national aspirations of planning as demonstrated within the National Planning Policy Framework. It is acknowledged that the policy does allow for some backland development, but it is overly restrictive and will not allow the increases of the quantum of housing will contribute towards protecting higher functioning areas of Green Belt. Development in rear gardens is a way of enabling development and achieving housing targets without impacting upon more rural greenfield sites. Denser developments particularly in close proximity of transport hubs is strongly in line with the proposed National Planning Policy Framework revisions, with garden and backland development able to provide additional housing in existing built up areas. Within more rural locations where true brownfield sites are sparse, the consideration of garden land as previously developed opportunities is advised by national policy and is directly contradicted by the proposed policy. Whilst proposed updates to national policy seek to optimise built form

on developed lands through increasing densities, which garden development would facilitate. As such this policy should be re-worded to accurately correspond with the National Planning Policy Framework and Government Objectives.

The Cofton Lake Road Site

The land promoted for future consideration and informed through a Green Belt Review is land to the east of Cofton Lake Road. This site corresponds with nearby development areas at Longbridge without causing coalescence. Extending approximately 2.6ha in size, the site is currently laid to a mix of arable farming and pasture land adjacent to 21 and 42 Cofton Lake Road, which are currently used as horse paddocks. The site falls within the West Midlands Metropolitan Green Belt but is well bounded by mature vegetation to its eastern, northern and western boundaries. The southern boundary of the site is delimited by a public right of way; The North Worcestershire Path. The eastern boundary is characterised by mature vegetation but is also formed by a public right of way known as footpath 518(b). In the north the site is coherently bound by Cofton Reservoir which is a distinctive local asset and has seen development to its north and south. The site is well screened from the reservoir by an established bank of large trees and vegetation.

The site is highly accessible, with public transport and services within reasonable walking distance from the site. In terms of travel by car, the site is located only 1.2 miles to the south of the A38 as it passes through Longbridge, which in turn provides direct access into Birmingham and to the national strategic highway network at the M5 in the west. Longbridge and Barnt Green rail stations are close to the site, and both provide frequent and rapid services into Birmingham city centre.

The site is otherwise unaffected by any statutory or non-statutory constraints and therefore provides a logical and appropriate site for development at Cofton Hackett. Claremont Planning emphasise that the site under the control of Spitfire Homes is suitable and available to provide a coherent and modest extension to Cofton Hackett, situated on the edge of the Longbridge development this will take advantage of the location as a point of particular growth. Moreover, the site's location also lends itself in meeting the needs of the Parish, as well as those needs arising from elsewhere beyond the jurisdiction of the Neighbourhood Plan Area. The site is within close proximity of local bus and rail services and could accommodate a sensitively designed residential scheme with minimal adverse impact upon the surrounding area.

Through previous assessment the site has been considered as a site with "Green Belt Potential" 2015 SHLAA, and as such remains available for further consideration by the District Council for development. These representations to the Neighbourhood Plan should also be considered as evidence of the site's continuing suitability for development and consideration for removal from the Green Belt that will not result in wider harm to its function. Additionally, through the site's assessment it has not been identified as contributing to open space either through its function or purpose. This demonstrates that the site does not hold sufficient value to be considered for preservation as open space.

Existing features of the site, such as the presence of mature vegetation to three of the site's four boundaries ensures the adequate screening will form part of any development proposal. Definition of the southern boundary with appropriate hedgerow planting will restore this delineation and help to mitigate any impact on the local landscape. In terms of long-term views development on the site will be imperceptible against the existing hillside built form at Cofton Hackett and existing dwellings off Cofton Lake Road. As such, in terms of landscape

value, the site demonstrates capacity to accommodate development that can be sustainably achieved and materially shaped by the Parish to ensure it meets the objectives of the emerging Neighbourhood Plan.

The site at Cofton Hackett is a suitable location to provide an appropriate allocation to contribute towards the arising needs as explained above. By directing growth toward this location, the NDP will have demonstrated that it is prepared to meet the unmet need of Bromsgrove, as well as that of the Parish population.

Conclusion

Claremont Planning, expanding upon the representations previously made to the emerging Neighbourhood Plan in summer of 2018, continues to emphasise the suitability of the site at Cofton Lake Road under control by Spitfire Bespoke Homes Ltd. The site has been recognised as an area of important local and green space in supporting evidence documentation, but however has not been established as such through emerging Policy. As such, limited development of the site, that is complementary with existing built form along Cofton Lake Road will not result in detrimental harm to the local landscape and nor to the Green Belt.

If the Neighbourhood Plan does not recognise the suitability of the site and include it as a location of preferred growth within the Parish, the delivery of the site may be dictated by the District council and therefore could be delivered without consideration of the Parish councils own parameters and aspirations for the Parish itself. This could avoid enforced housing requirements being made by Bromsgrove District, over and above that of the wishes of the Parish Councils. Our client's site at Cofton Hackett can therefore provide a future option for expansion of the settlement, which can take advantage of the nearby growth and regeneration occurring at Longbridge. This will also ensure that the rural character of the other areas of the Parish is conserved and the wider context of the Green Belt preserved.

Claremont Planning, on behalf of Spitfire Bespoke Homes Ltd, thank the Parish Councils for this further opportunity to make comment on the emerging Neighbourhood Development Plan and look forward to working with the Parish Councils in realising the development potential of the site at Cofton Lake Road.

Yours sincerely,



Katherine Else MRTPI Bsc Hons PG Dip

Managing Director

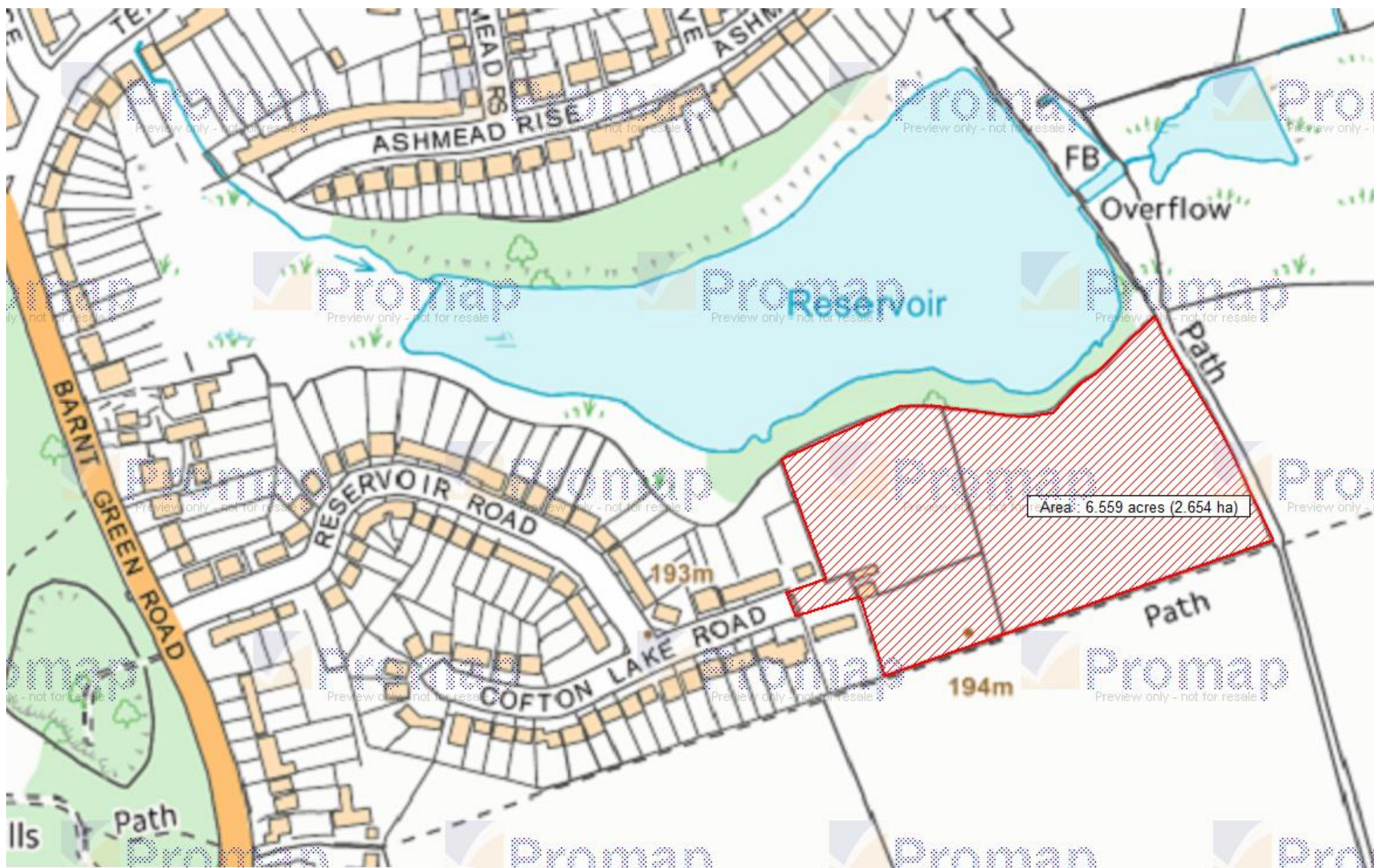
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Enc - Site Plan
 - Response Form

Appendix 1 – Illustrative Masterplan





About this Consultation

The joint Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan 2018-30 was submitted to Bromsgrove District Council on 12th December 2018. 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.

In order to give the Council a clear and accurate picture of your views, it is preferred that you make your representation on this specific 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 14th February 2019 to Friday 29th March 2019

Where to view the Documents

During the dates of the representation period, the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan can be viewed at the following locations:

- Online at <https://www.bromsgrove.gov.uk/lbchnp> or on the Lickey & Blackwell parish council website and the Cofton Hackett parish council website at <https://www.lickeyandblackwellpc.org/> <http://coftonhackettpc.org/>
- In hard copy format (during opening hours) at Bromsgrove Library, Parkside, Bromsgrove B61 8DA.

Supporting submission documents that accompany the Neighbourhood Plan, including a Basic Conditions Statement, Sustainability Appraisal and a Consultation Statement, can also be viewed at the locations above and online.

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 Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan. All representations received by the District Council will be sent to the person appointed to undertake an independent examination into the Lickey & Blackwell and Cofton Hackett Neighbourhood Development 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 at the end of this representation form.**

Your contact details

Name	Katherine Else
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Representing (e.g. self or client)	Spitfire Bespoke Homes Ltd
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Telephone Number	0121 231 3610

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

Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan - Regulation 16 Response Form

Section 1: Introduction and Background

Do you have any comments to make on 'Section 1: Introduction and Background' of the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan?

Section 2: A portrait of Lickey & Blackwell and Cofton Hackett

Do you have any comments to make on 'Section 2: A portrait of Lickey & Blackwell and Cofton Hackett'?

Section 3: A NDP for Lickey & Blackwell and Cofton Hackett

Do you have any comments to make on 'Section 3: A NDP for Lickey & Blackwell and Cofton Hackett'?

Section 4: Vision and Objectives

Do you have any general comments to make on 'Section 4: Vision and Objectives'?

The Neighbourhood Plan, in terms of its Vision and component Objectives, must be mindful in supporting requisite growth and development within the Parishes in line with the aspirations of both the District and Parish councils. Whilst it is duly acknowledged that the Parishes are constrained by the extent of Green Belt coverage over the Parishes, which minimises the development potential of much of the land within the Parishes, the Neighbourhood Plan must engage with opportunities in securing options for development in the medium to long term.

It should be noted that the Vision of Submission Draft of the NP, which provides the strategic aspirations of the Plan, whilst is in line with the objectives of the Plan, those which underpin the Vision, is erroneous in it's the timeframe which it is being applied. The Vision denotes its application from 2018 to 2038, whereas the Plan period itself is from 2018 to 2030. In the first instance, this requires modification and without such amendment, informs a poor basis of the Plan moving forward. Claremont Planning maintain therefore that the Plan requires amendment to ensure that it is legally compliant and fully accurate to ensure its implementation as part of the Development Plan can be realised.

The significant extent of the Green Belt designation which covers the Parishes is a primary consideration and theme of the emerging Neighbourhood Plan. As such, a number of Objectives of the Plan provide specific focus on the maintenance and preservation of the Green Belt across Lickey and Blackwell and Cofton Hackett. It is maintained however, as it was through previous representations submitted to the emerging Plan, that Objectives 1 and 2 engage should fully with the District, high-level Green Belt review in a way that ensures that Objectives 4-6 are supported as far as possible. Given that the Green Belt significantly constrains the development potential of the Parishes, it must be practically and logically engaged with, and along the lines of the Green Belt review of the District Council. It is advanced that the Neighbourhood Plan must remain in a position to ensure that due consideration is granted to opportunities that can achieve sustainable development within the Parishes, including consideration of sites such as those under control by Spitfire Bespoke Homes Ltd.

Section 5: Key Issues and NDP Planning Policies?

Do you have any general comments to make on 'Section 5': Key Issues and NDP Planning Policies?

It is acknowledged that the Plan must make certain provisions and lengths to preserve the natural environment within the Parishes, in particular the highly valued landscape centred around the extensive woodland and the rolling landscape of the Lickey Hills. This coupled with the blanket designation of Green Belt across the Neighbourhood Plan area results in a particularly constrained environment for the possibility of development to come forward and whilst development, if any, needs to be delivered within the policy requirements of the Neighbourhood Plan, there nonetheless is a requirement for some residential growth to meet the needs of the Parishes. Claremont Planning supports the view of the NP in terms its allowance for some small-scale, infill development, but this does not go far enough in securing preferred locations and directions of growth within the Parishes. It is acknowledged that the NP has limited powers in terms of securing development potential within the Green Belt, with the ability to release land within it only granted to the District Council, however it would be advantageous to the Neighbourhood Plan if due consideration was provided to sites that could logically and suitably accommodate development within the Green Belt, if it were to be released at the District level. This would be in line with the aspirations of Bromsgrove District, the Plan of which is being reviewed alongside a review of the Green Belt. If the Neighbourhood Plan indicated preferable locations within the Green Belt for release and development through the Plan, the Parishes would be in a position to more strongly influence the approach taken by Bromsgrove and as such achieve development in line with the aspirations of the Neighbourhood Plan.

The Neighbourhood Plan Review is being prepared alongside the review of the adopted Development Plan, meaning that policy should be included allowing its review to reflect the updated Development Plan. Protracted delays in updating the Neighbourhood Plan to accommodate such policy changes should be avoided and therefore **Paragraph 5.4**; *“5.4 The implementation of the NDP will be monitored on a regular basis by the Parish Councils. There will be a full or partial review of the NDP following the completion of the Green Belt. Review which will be undertaken by approximately 2023, and the subsequent adoption of the Local Plan review,”* should include reference to maximum 12-month timetable to allow or the update of the Neighbourhood Plan. Failure to provide an updated plan or appropriate timescale for its review would mean that there would be a policy gulf that would allow an “unplanned

environment” to proceed.

More specifically, do you have any comments on individual policies or community actions within the Lickey & Blackwell and Cofton Hackett Neighbourhood topic areas?

Topic 1 – Policies for Natural Environment

A primary consideration and theme of the Neighbourhood Plan is the valued landscapes which characterise the Parishes, which includes natural assets such as the Lickey Hills but also manmade elements such as Cofton Reservoir. These together form a unique and valuable landscape which the Neighbourhood Plan attributes great weight towards protecting. In particular, the site at Cofton Lake Road under the ownership of Spitfire Bespoke Homes Ltd, situated adjacent to the Cofton Reservoir, falls within this consideration and as such is required to be engaged with. However, given that development of the site would not intrude into the wider, open area from Stocken to Cofton Church Lane, there will be no impact on the views across this open area to the south. Additionally, development would allow for intervention within the spaces directly adjacent to the lakeside that could enhance the habitats around it through mitigation and management of these existing environments.

As iterated previously, Claremont Planning advanced that the site at Cofton Lake Road, whilst recognised within the Cofton Hackett Character Appraisal as an area of important open/green space, this has not translated into the site's designations a Local Green Space. Therefore, whilst the space has been recognised as important, this does not exclude the site from consideration for development or discount its potential to accommodate growth in the future. Furthermore, the entirety of the site certainly will not be developed given its position with the Green Belt and Spitfire Bespoke Homes Ltd are particularly aware that a sensitive and landscape-led development would ensure that any impacts on the local landscape are minimised, but sympathetically implemented.

Topic 2 – Policies for Built Heritage and Design

Topic 3 – Policies for Housing

As has been stated, the approach of the Neighbourhood Plan is acknowledged to be pragmatic, given the extent of Green Belt and valued landscape coverage within the Parishes. This falls in line with the aspirations of the Plan to ensure that development is limited to help preserve the natural environment of the Neighbourhood Plan Area. Whilst the Plan recognises the strategic nature of the District Plan review and the review of the Green Belt and that this is occurring above the level of the Neighbourhood Plan, it is a failure of it to not fully and robustly engage with this review given the proximity and suitability of the settlements within the Parishes to the Birmingham conurbation. Suitable sites, such as that under the ownership of Spitfire Bespoke Homes Ltd, should be duly considered to accommodate residential development, given the lack of Green Belt function it demonstrates and its logical location to achieve further growth.

The strategic considerations that the Neighbourhood Plan regards as relevant to only the District level does not appropriately prepare the Plan for the repercussions that strategic decisions could have on the Parishes, in particular the coverage of Green Belt. Nor does the Plan make due consideration of the strategic pressures being experienced at present within the area, especially from the growth and development pressures arising from the Greater Birmingham Housing Market Area on Bromsgrove, which statutorily, must take on some of this unmet need. Therefore, the District Plan review may result in the allocation of development within villages such as Cofton Hackett where it is identified that Green Belt has the capacity to accommodate development and for

land to be released from it. As such, the Plan should take greater lengths in achieving reasonable levels of growth that can both meet the needs of the Parishes, but also contribute towards the strategic requirement that can be implemented suitably within the remits and levels of the Neighbourhood Plan policy framework.

Topic 4 – Policies for Infrastructure

Topic 5 – Policies for community facilities

Topic 6- Policies for Commercial and Business Interest

Section 6: Next Steps

Do you have any comments to make on 'Section 6: Next Steps?'

Other Comments

Do you have any other comments on the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan?

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?

(If Yes, please ensure your contact details are provided on this form)

Yes

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No

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