



LICKEY & BLACKWELL AND COFTON HACKETT NDP– SUMMARY OF REGULATION 16 REPRESENTATIONS

Representation	Section/Policy/Para	Comment (Summarised or Extract)
Harris Lamb OBO/Barratt Homes	Section 1	<p>It should be noted that the BDP itself is incapable of meeting the districts housing growth requirements. The emerging plan will need to play a key role in meeting a proportion of Birmingham City's unmet housing need. The District Council are currently preparing a local plan within this context.</p> <p>The approach of a large number of policies in the emerging NDP will be rendered out-of-date by the adoption of a replacement Local Plan relatively soon. The introductory section should confirm this wider policy context and that a full review of the NDP will need to be undertaken.</p>
	Section 2	<p>We generally support the various areas included in Section 2. It should however be noted that the northern boundary of Cofton Hackett adjoins the built-up edge of Birmingham. This area is notably different than the various villages within the NDP area in character as it is urban fringe land dominated by dense development.</p>
	Section 3	<p>The wording in section 3 should be revised to acknowledge that the BDP is subject to a review, and this will affect the weight and relevance that can be attached to the NDP once the replacement NDP is adopted.</p>
	Section 4	<p>We support the majority of the NDP Objectives; however, the requirements of Objective 1 need to be revised. Objective 1 should be revised to advise that the existing Green Belt will be protected in accordance with national and local level planning policies.</p>

	Section 5	<p>It is our view that the supporting text should be amended. At para 5.2 should say; Applications for planning permission should be determined in accordance with the development plan, including the NDP, unless material considerations indicate otherwise.</p> <p>Reference to para 30 advises that once the NDP has been made, its policies can take precedence. This is not the case; the policies from the BDP effectively supersede the NDP policies if there is a conflict in policies.</p>
	Policy NE1	<p>It is advised at para 6.16 that the NDP provides robust evidence for the forthcoming Green Belt review to support the preparation of the BDP. This is not the case. The NDP does not include any form of assessment against the role of the purposes of the Green Belt identified by the framework. Whilst the NDP does include a commentary on the landscape within the Green Belt, this is not an analysis of the role and purposes of the framework identified by para 133 & 134 of the framework.</p> <p>The final sentence of 6.16 should be removed accordingly. There is no evidence within the NDP to indicate that the Green Belt land within the plan area is more, or less sensitive than Green Belt land elsewhere.</p> <p>Policy NE3 should not include as a starting point an assumption in favour of the provision of Green Roofs. This reference should be removed. There is no statutory for the delivery of green roofs.</p>
	Policy BD2	The policy should be reworded to; support the delivery of high quality contemporary developments when in keeping with their surroundings.
	Policy H1	The Policy should be clear in confirming that the approach towards delivering housing outlined in Policy H1 will apply to such a point that the Local Plan review is complete.
	Policy H2	Housing mix should be re-worded to encourage the delivery of a variety of different house types reflecting market demand and the availability of properties within the area.
	Policy INF1	In the first instance the policy should require the provision of infrastructure to support electric charging points rather than the charging points themselves. Property owners should have the opportunity to install an electric charging point that meets their requirements at an appropriate point in time.
Birmingham City Council	All	BCC welcomes the acknowledgement in the NDP that, as part of the review of the BDP, the council will be reviewing the Green belt which will ensure that opportunities for growth are

		identified to meet wider needs across the Greater Birmingham and Black Country Housing Market Area.
Savills OBO Cala Homes	Section 4	<p>We acknowledge the addition of the phrase ‘where possible but consider that this objective is premature and should not be included in the NDP until the findings of the Green belt Review have been finalised and published.</p> <p>Objective 2 still pre-empts the findings of the Green Belt Review & we suggest that Objective 2 should be re-worded to reflect this.</p> <p>Objective 4 we seek clarification on what the NDP considers ‘modest’ development. We consider that this wording is not suitable if sites area allocated in this area within the BDP review following the Green Belt Review. We seek further justification on the wording of objective 4.</p>
	Section 5	<p>Within our submission in July 2018 we considered that the statement “The neighbourhood areas location within the Green Belt means that extensive new housing developments would be inappropriate” in para 5.3, pre-empted the findings of the upcoming Bromsgrove Green Belt Review. We note that the wording of this paragraph has remained unchanged in the submission version of the NDP.</p> <p>In light of the revised NPPF and Housing Delivery Test we consider that the sentence “The neighbourhood areas location within the Green Belt means that extensive new housing developments would be inappropriate” should be removed until the findings of the Green Belt Review have been published.</p>
	Policy NE1 6.1	<p>We note that the wording of “Lickey & Blackwell and Cofton Hackett are largely located within the Green Belt and only very limited development is appropriate” has remained unchanged from the Draft Plan to the Submission Plan. We consider that this statement pre-empts the findings of the Green Belt Review which may recommend the release of Green Belt land in this area for development due to its close proximity to the Birmingham conurbation. We consider that the Green Belt should be not referred to in the Natural Environment Chapter where policies should more appropriately relate to local landscape character, biodiversity, green infrastructure and geodiversity.</p>

	Policy NE1 6.15 and 6.16	As mentioned above, as Green Belt is not an environmental tool, we consider that it should not be mentioned within the Natural Environment Chapter. We also consider that the conclusions on Green Belt land along Old Birmingham Road and the role it performs, pre-empt the findings of the Green Belt Review and there is currently no up-to-date evidence to support the comments in paragraphs 6.15 and 6.16. Therefore both paragraphs should be removed.
	Policy NE1	<p>In our submission to the Draft Plan (July 2018), we suggested that the statement in the second paragraph “landscaping schemes should be designed to protect and enhance the distinctive elements which contribute to the local landscape character in Lickey & Blackwell and Cofton Hackett” should be reworded in order to accord with the revised NPPF.</p> <p>In our previous response, we sought clarification on point 1 of Policy NE2 (now Policy NE1) which states ‘any felled trees replaced with native species which grows to an appropriate scale’. As this statement has not been amended from the Draft to Submission version, we continue to seek clarification on what an ‘appropriate scale’ is in relation to the replacement trees</p>
	Policy NE1 Point 4	We note that Point 4 in Policy NE1 has remained unchanged from the Draft to Submission version. We consider that the statement “where possible, remaining areas of permanent pasture around the edges of existing settlements should be protected from development” should be removed.
	Policy NE2	we suggested that the wording of Paragraph 3, “where a culverted watercourse falls within the footprint of a development, the water course should be restored to a natural channel” should be altered to include ‘where possible’ so that future land options in the Neighbourhood Plan area are not adversely impacted by this requirement. We consider therefore that a blanket approach should not be taken to removing culverted sections of water course adversely affected.
	Paragraph 6.36	We support the inclusion of the NPPF definition of Green Infrastructure in the Submission version of the Neighbourhood Plan.
	Policy NE3	We did not object to this policy, but considered that this policy on Green Infrastructure is essentially a repeat of Policy BD24 of the Bromsgrove District Plan. Therefore, we still consider that this policy should be deleted.
	Policy BD2 Point 2	We objected to Point 2 of Policy BD2 as we considered it sought to decrease residential densities and was contrary to the NPPF.
	Policy BDP7.2	We consider that this statement is contrary to Policy BDP7.2 in Bromsgrove District Plan and the NPPF (February 2019). We consider that reference to low densities in Policy BD2 should be removed in order to accord with local and national planning policy.

	Chapter 8 Housing	<p>We consider that the Neighbourhood Plan should make reference to both the Greater Birmingham HMA shortfall and Standardised Methodology as they may have a significant impact on the housing requirement which will be set out in Bromsgrove's Local Plan Review. Additionally, with the adoption of the District Plan (2017), it confirmed that Bromsgrove does not have enough non-Green Belt land to meet the current housing requirement which resulted in the inclusion of Policy BDP3 which states that a Green Belt review should be undertaken and Green Belt land would be released for housing in order for the District to meet their housing requirement in the District Plan.</p> <p>Additionally, the Ministry of Housing, Communities and Local Government ('MHCLG') published the Housing Delivery Test on 19th February 2019. We consider that the figures are used to incentivise local authorities to drive up housing delivery with a 'presumption in favour of sustainable development'. The government deems 95% delivery of assessed need as the pass rate. Councils that deliver between 85% and 95% of assessed need must develop an action plan, whilst those that deliver between 25% and 85% must identify 20% more land for development than originally required in the five-year supply included in Local Plans.</p>
	Paragraph 8.1	<p>We considered that the Neighbourhood Plan should identify land on the edge of settlements that are sustainable housing sites. As the wording of this paragraph has remained unchanged from the Draft to the Submission version, we continue to object to this point. As acknowledged within Policy BDP3 of the Bromsgrove District Plan, there are limited brownfield opportunities within existing settlements therefore Green Belt release will be required across the District to meet the 7,000 dwelling requirement. We therefore consider that the although paragraph 8.1 of the Neighbourhood Plan seeks to focus development within the existing settlement boundaries, the Plan should identify land on the edge of settlements as there are limited development site opportunities within the existing settlements. We consider that local communities should play a proactive role in identifying where new development could be delivered in their areas.</p>
	Paragraph 8.3	<p>We consider that the District's 7,000 dwelling requirement is not a 'target' but should be seen as a minimum requirement. As the MHCLG is committed to boosting the supply of housing, we suggest that this paragraph should be amended to remove 'target' and include 'a minimum of 7,000 dwellings'.</p>

	Policy H1	We do not object with the wording or inclusion of this policy. However, we consider that this policy will need to review if the Green Belt review identifies any Green Belt land within the Neighbourhood Plan area that could be released for residential development.
	Policy H2	Policy H2 within the Submission Version of the NP has been rewording to include 'where possible' at the start of the policy. We support this additional text as it provides slightly more flexibility for developers
	Policy H3	We consider that more flexibility is required in order to make this policy sound and deliverable. Therefore we proposed that this policy is slightly reworded to the following "Where viable, new housing should include suitable energy efficiency measures..."
	Chapter 9 Infrastructure Policy INF1	We support the inclusion of 'where possible' in the second paragraph in the Submission version of the Neighbourhood Plan.
	Policy INF2	In relation to Policy INF2, we consider that 'where appropriate' should be included before the first paragraph so that it reads "where appropriate, new developments should be designed to incorporate a strong focus on age and dementia friendly environments". Again, this should ensure that there is more flexibility for future developers on sites where it may not be viable to deliver such design.
Catshill and North Marlbrook Parish Council	Chapter 8 Housing	If no preferred sites for development are identified, it makes the whole parish area vulnerable to housing sites being identified via the Bromsgrove District Council Green Belt Review, which is currently underway. The failure of the Neighbourhood Plan to have some criteria for identifying preferred sites for potential housing development reduces the influence of the Neighbourhood Plan on future site allocation via the Green Belt Review.
	Paragraph 8.10	The consultation on Issues and Options demonstrated very little local support for identifying any site allocations for small infill development and therefore the NDP will not seek to allocate any housing sites.
	Paragraph 8.16	There was no demand for the NDP to identify site allocations for small scale new housing development.
	Chapter 9 Infrastructure	The Government recently announced plans to phase out the manufacture of petrol/diesel engine motor vehicles in the UK by 2040 and is encouraging the manufacture of electric vehicles. I have not seen any reference of the need for new homes to have electric charging points included in their design.

Claremont Planning OBO Spitfire Homes	Chapter 4 Vision & Objectives	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.
	Chapter 4 Objective 1-2	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.
	Chapter 4 Objective 4-6	The favourable stance posed by objectives 4 – 6 is supported however, providing the opportunity for sustainable development to be delivered.
	Paragraph 5.4	<p>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</p> <p>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.</p>
	Chapter 6	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. 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.

	Chapter 5 Page 21	<p>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.”</p> <p>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</p>
	Paragraph 8.16	Paragraph 8.16 states that; 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”.
	Objective 5	The Neighbourhood Plan should identify infrastructure requirements but if no development is promoted through the policy than 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.
	Objective 6	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.
	Chapter 8	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.
	Objective 1	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.
	Policy NE2 Local Landscape Character	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 it’s 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.

	Policy BD3 Garden and Backland 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.
Coal Authority	All	Having reviewed your document, I can confirm that we have no specific comments to make on it.
Environment Agency	Chapter 8	<p>The associated Neighbourhood Plans offer robust confirmation that development is not impacted by flooding and it should ensure that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.</p> <p>As confirmed previously, we would only make substantive further comments on the plan if you were seeking to allocate sites in flood zone 3 and 2 (the latter being used as the 1% climate change extent perhaps).</p>
Highways England	All	As the planning policies for new development focus on guiding relatively small-scale development within the existing village boundaries we do not foresee there to be implications for the continued safe and efficient operation of the SRN.
DJM Consulting OBO Local Landowner	All	<p>The pending Green Belt review is a strategic matter being led by the Local Planning Authority (LPA).</p> <p>The NDP appears at various points to seek to provide a perceived extra layer of protection from development to certain areas, by naming them specifically as parts of the Green Belt over which there are particular local concerns about pressure from development. For example, paragraph 6.15 identifies farmland at Yew Tree Farm, the quarry on Brookhouse Road and land on Linehouse Lane.</p> <p>If this is the intention of the NDP, then we object to that intention.</p> <p>We echo a previous consultation response submitted in a different consultation by a different landowner that the Green Belt is a planning tool designed primarily to prevent urban sprawl, not to protect landscapes with high value.</p>

		<p>It is appreciated that the rural feel of the area in such close proximity to the larger conurbations of Bromsgrove and Birmingham is important to the local community, as are the separate identities of the settlements and villages within the plan area.</p> <p>The Green Belt review will be looking at the Green Belts' compliance with its five purposes. Safeguarding countryside because neighbours like to look at the semi-rural character is not one of the five purposes of the Green Belt.</p> <p>Small-scale extensions adjacent to existing settlements would not necessarily result in the merger of urban areas or smaller villages.</p> <p>We note that the NDP will be reviewed following the Green Belt Review to ensure it remains a compliant plan.</p> <p>We also note that the Parish Councils are committed to remaining involved in the Green Belt Review process but this will run alongside the NDP process.</p> <p>Residents and other users of the area need to be careful not to assume that the statements included in the NDP, referencing Green Belt and the need to protect areas that local people are fond of, will prevent Green Belt release. We disagree therefore with the statement made at paragraph 6.16, that the NDP provides robust evidence for the forthcoming Green Belt Review.</p>
Historic England	Chapter 7	<p>We particularly commend the very effective use of historic characterization to provide a context and a sound evidence base for well thought out Plan policies and fully support the requirement for developers to take account of the characterization work when designing their proposals. We are also pleased to note the recognition afforded to the characterization workshops undertaken by Jack Hanson of Worcestershire County Council, with funding from Historic England".</p> <p>Overall Historic England considers that the Draft Neighbourhood Plan is a well-considered, concise and fit for purpose document which takes an exemplary approach to the historic environment, exemplifies "constructive conservation" and constitutes a very good example of community led planning.</p>

National Grid	All	An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan Area.
Natural England	All	Natural England does not have any specific comments on this neighbourhood plan.
Sport England	All	A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.
	Chapter 8	Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.
Severn Trent	Policy H3	<p>Severn Trent is supportive of the Neighbourhood Plan. We would like to encourage you to add to policy H3 sustainable water resource use and strongly recommend that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with this approach. Further information on water efficiency can be found within the water efficiency section of this response.</p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p>

WCC	Education	We endorse our previous comments as set out in the consultation statement and will work with the school to protect the school assets and to ensure appropriate mitigation is put in place to ensure a sufficiency of school places in the area.
	Paragraph 9.5 Public Rights of Way	In some instances the public rights of way team may be required to install temporary closures on public rights of way for the safety of footpath users such as the one on the railway mentioned. In these instances although we try to provide suitable alternative routes, this may not always be possible due to the local geography. However, we would agree that with any permanent diversion of footpaths a suitable alternative route must be provided and this would be subject to public consultation.
	Transport	We would welcome the inclusion of a wording in the plan stating that all developments must meet the requirements set out in Worcestershire County Council's Streetscape Design Guide.
	Health & Wellbeing	The public Health Team welcomes the inclusion of active travel, the promotion of recreation and leisure and the focus on safe, accessible and age friendly environments in the plan. We suggest that the plan also promotes measures to enhance food growing opportunities for larger developments such as the provision of community orchards and allotments.