

**REPRESENTATIONS TO THE ALVECHURCH
NEIGHBOURHOOD PARISH DEVELOPMENT
PLAN:**

ON BEHALF OF

JAMES CHRISTOPHER HOMES

AUGUST 2018

REF 18.311



Cerda Planning have been instructed by James Christopher Homes to submit representations to the Alvechurch Parish Neighbourhood Plan which has recently been submitted to Bromsgrove District Council.

The following comments are made in relation to the draft Plan and its appendices and follow comments made to the previous draft of the Alvechurch Neighbourhood Plan (Submitted in November 2017).

Cerda Planning in general continue to welcome the drafting of a Neighbourhood Plan for Alvechurch. In line with the Localism Act of 2011, the Neighbourhood Planning process allows local communities the opportunity to “plan” for themselves. The recently published NPPF 2 advocates such an approach whereby the Neighbourhood Plan can develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development and that reflect the needs and priorities of communities providing they are planned in a positive manner to support local development which shapes and directs development in their area.

The preparation of a Neighbourhood Plan is consistent with paragraph 15 of the NPPF which states that ***'The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings'***.

The dedicated chapter on Neighbourhood Plans states that Neighbourhood Planning gives communities direct power to develop a shared vision and deliver the sustainable development they need. It emphasises that the ambition of the Neighbourhood Plan should be aligned with the strategic needs and priorities of the wider local area and that Neighbourhood Plans should be in general conformity with the strategic policies of the Local Plan. It specifically advises at paragraph 29 that ***'Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies'***

It is therefore clear that residents of Alvechurch have accepted that there is a need to allow further development in the village in order to secure the long term survival of the community, whilst retaining its unique and distinctive character.

Cerda Planning are still generally supportive of the Alvechurch Parish Neighbourhood Plan in particular the understanding that a Green Belt review will be required in order to support future residential development. Larger settlements such as Alvechurch will be expected to accommodate additional development and therefore it is important that Green Belt land is properly assessed and where appropriate released in order to facilitate sustainable development on the edge of Alvechurch. Cerda planning welcome a number of amendments made to the Neighbourhood Plan since the last consultation took place,

however, concerns still remain that the Neighbourhood Plan restricts sustainable development by suggesting that development should only be located within Alvechurch Village. In addition, the Plan remains silent on potential areas of land that could be released from the Green Belt. Whilst it is appreciated the Neighbourhood Plan acknowledges the need for a Green Belt release which is due to commence in advance of 2023, it would be proactive to identify areas of land that currently perform poorly against the principles of the Green Belt ahead of the inevitable Neighbourhood Plan Review. The Neighbourhood Plan should provide a clear steer on its preferred Green Belt locations for growth.

Finally, it is disappointing that the Neighbourhood Plan does not propose any housing allocations. The recently published revised NPPF states that **'Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area'**. However, despite Alvechurch being identified to as a large settlement and therefore being expected to accommodate a high level of development, no allocations are put forward within the Plan. Given that the Bromsgrove District Plan identifies Alvechurch as a second tier settlement, it is clearly expected to receive a large amount of growth and therefore the Neighbourhood Plan should seek to direct this growth through residential allocations.

I. POLICY H1: LOCATIONS FOR NEW HOUSING DEVELOPMENT

Cerda Planning continue to support the principle that brownfield land will be prioritised over greenfield inline with NPPF guidance and that the settlement of Alvechurch will be the focus of residential development. However, it is regrettable that our comments submitted during the previous consultation have not resulted in amendments to Policy H1. Whilst it is positive that part B of Policy H1 prioritises the redevelopment of brownfield land, it is frustratingly undermined by part A which states that development must be located within the designated Alvechurch Village settlement boundary, essentially preventing any sustainable development from being delivered if it falls outside of the immediate village confines. It is noted that a number of sustainably located brownfield sites with favourable access to local services, facilities and public transport are located outside of the settlement boundaries. It is our view that Policy H1 should be amended so that sustainably located brownfield sites outside of the Alvechurch settlement boundary receive support and therefore can be brought forward making a meaningful contribution to Bromsgrove's growing housing requirement.

Our client is the owner of Alvechurch Business Park, a brownfield site which lies outside of Alvechurch settlement boundary and falls under Green Belt designation. However, the site has recently received a residential permission to develop the north eastern part of the site (Ref-16/1190) and therefore is clearly considered sustainable by Bromsgrove District Council with

principle of development established. The remaining area of the business park remains brownfield in nature and can be considered available, viable and deliverable. As outlined in our representations to the previous draft of the Alvechurch Neighbourhood Plan restricting residential development to sites only located within the village settlement boundary is a narrow approach to sustainable development.

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, therefore brownfield sites lying outside the settlement boundary but are sustainably located should be given equal weight to sites within the village boundary. This approach is supported in paragraph 145 of the NPPF which states that an exception to Green Belt policy is the limited **'infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use'** (Subject to harm to the openness of the Green Belt). Therefore development of our client's site is appropriate development and should not be prejudiced by part A of Policy H1. It is suggested that the policy is amended to demonstrate flexibility in bringing forward sustainable brownfield sites located outside of the settlement boundary inline with guidance within the NPPF.

II. POLICY H4: HOUSING DESIGN PRINCIPLES

Cerda Planning welcome the minor amendment to Part B of Policy H4 removing the reference to 'small scale', however it is still noted that very specific design criteria could be considered too onerous by a number of developers impacting on the viability of bringing sites forward. The policy goes above and beyond the Development Plan and could therefore be deemed inconsistent with the Local Development Framework, preventing sustainable development from being delivered.

Paragraph 126 of the NPPF comments on the importance of achieving well designed places, however, it also states that **'their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified'**. Clearly a degree of flexibility should be applied to Policy H4 in order to determine applications on an individual basis. It is still our view that Policy H4 should focus on more general guidance in order to facilitate further opportunities for sustainable development and ensure development is not unnecessarily prevented.

III. POLICY H6: PROVIDING A MIX OF HOUSING TYPES AND SIZES

Cerda Planning support the amendment to Policy H6 which ensures that housing mix requirements will be reviewed/updated based on the latest evidence such as Strategic Housing Market Assessments/local surveys and in accordance with Bromgrove's District Council's Plan Review, providing flexibility for developments coming forward on a site by site basis.

IV. POLICY HDNE 4: PROTECTING LANDSCAPE AND OPEN VIEWS

Cerda Planning remain supportive of Policy HDNE4 which seeks to safeguard important landscapes and attractive open views. Where possible, all new development should be directed towards previously developed land with greenfield land coming forward as a last resort. All sustainably located previously developed land should be prioritised in terms of development so as to protect access to open space and key views within the Neighbourhood plan area.

V. POLICY HDNE 5: ACCESS TO THE COUNTRYSIDE

Cerda Planning remain fully supportive of Policy HDNE 5 as access to the countryside is crucial for improved health and wellbeing. Every opportunity should be taken to improve links between residential areas and open space beyond settlement boundaries. Green infrastructure and access to open space is increasingly becoming a material consideration due to green spaces link with a high standard of living and high quality of life.

Our clients site (Scarfield Business Park) lies between the Worcester and Birmingham Canal as well as open countryside to the west of Alvechurch. Development of this site will not only provide a number of sustainably located dwellings but also assist in increasing access to the open countryside, in particular the Worcester and Birmingham Canal. Currently the site comprises previously developed land with excessive hardstanding. Development of the site would provide any future residents with access to both the canal network and the open countryside improving health and well-being. The importance of development that facilitates greater access to the open countryside and green infrastructure is supported and is evidenced by the existing permission (16/1190) for 9 dwellings to the north east of the business park.

VI. POLICY HDNE 6: PROTECTION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT

Policy HDNE 16 discusses enhancement of the natural environment and how new development can support this. Cerda Planning are supportive of this policy as developing previously developed land is an effective way to improve the natural environment and ensure that instead of land acting as a barrier to wildlife it can actually safeguard, create and reconnect wildlife.

VII. SUMMARY

Cerda welcome the Alvechurch Neighbourhood Plan which seeks to ensure positive development within the Parish. Whilst a few positive amendments have been made to the policies outlined above, it is regrettable that a number of points raised with our last representation submission have not been reflected within the Plan. Despite the increasing housing need within the District and overspill from neighbouring authorities the Neighbourhood Plan is silent on housing allocations. Given Bromsgrove District Council have committed to a Green Belt Review, a proactive stance would see sites allocated to accommodate present and future growth as directed by the Bromsgrove Development Plan. Similarly, it is disappointing that the plan does not identify potential areas for Green Belt release or support the redevelopment of brownfield sites outside of the village settlement boundary. In our view this stance could restrict sustainable development from being delivered which is in direct conflict with the thrust of the NPPF and Development Plan.

My client has secured a residential permission for redevelopment of part of parcel of Scarfield Business Park, highlighting its sustainable credentials. It is clear that the rest of the site would act as a logical extension to the settlement of Alvechurch and as such should be viewed favourably.

Cerda Planning

August 2018