

**ALVECHURCH PARISH NEIGHBOURHOOD PLAN
2011-2030
SUBMISSION STAGE (REGULATION 16)
CONSULTATION VERSION**

AUGUST 2018

**REPRESENTATIONS ON BEHALF OF
GALLAGHER ESTATES LIMITED**

Pegasus Group

5 The Priory | London Road | Canwell | Sutton Coldfield | West Midlands | B75 5SH

T 0121 308 9570 | **F** 0121 323 2215 | **W** www.pegasuspg.co.uk

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1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Gallagher Estates Limited to make representations to the Alvechurch Parish Neighbourhood Plan (APNP) (2011-2030), Submission Stage, March 2018.
- 1.2 Gallagher Estates welcome the opportunity to make observations and comment in respect of the 'Alvechurch Parish Neighbourhood Plan 2011-2030' (Regulation 16 Consultation) and are supportive of the proactive approach being taken by the Alvechurch Parish Council (APC) in preparing a Neighbourhood Plan for Alvechurch to identify and deliver the aspirations of the local community.
- 1.3 Gallagher Estates Ltd have current land interests within the Neighbourhood Area on land off Station Road, Alvechurch. A site location plan is attached at **Appendix A** and an Provisional Development Framework and GI Plan, indicating how development could be brought forward on this site, is attached at **Appendix B**.
- 1.4 These representations are framed in the context of the 'Basic Conditions' relevant to the preparation of a Neighbourhood Plan, as required under Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990:
 - Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - The making of the neighbourhood development plan contributes to the achievement of sustainable development;
 - The making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - The making of the neighbourhood development plan does not breach, and is otherwise compatible with EU obligations and Human Rights Requirements; and

- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.
- 1.5 Our interpretation of these basic conditions is informed by recent Neighbourhood Development Plan (NDP) Examiners' Reports and High Court Decisions, which have affirmed the status of NDPs in the planning process, and identified the scope and intent of the basic conditions in terms of detailed planning policies.
- 1.6 Gallagher Estates Ltd would welcome the opportunity to discuss further any matters raised in this representation and to address any questions that may be outstanding in terms of their interests within the neighbourhood area. This includes land off Station Road, Alvechurch.
- 1.7 The purpose of these representations is to highlight areas of the Neighbourhood Plan that are supported and to assess whether the Neighbourhood Plan meets the Basic Conditions set out in Paragraph 8(2) of Schedule 4B of the Town & Country Planning Act 1990. These representations are intended to be helpful in identifying a number of amendments that should be incorporated within the NDP having regard to recent changes to national planning guidance and the progress of emerging changes at the District level which are likely to significantly influence plan-making at the local level.
- 1.8 Bromsgrove District Council has commenced its Local Plan Review and anticipates the initial options consultation to take place in September 2018. Originally this was anticipated as being May/June 2018, as per the timetable published in Bromsgrove Lichfield District Council's Local Development Scheme (LDS) (January 2018). The LDS also indicated that following the initial options consultation, a Call for Sites would open in September 2018 to enable the Council to consider all relevant land options prior to formulation of its District Plan Review Preferred Options consultation, scheduled for May/June 2019. Slippage with this timetable may therefore mean that the Call for Sites will more likely take place around January/February 2019, with the Preferred Options consultation possibly following in September 2019.

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- 1.9 It is clear from Bromsgrove District Local Plan 2011-2030 (BDP) Policy BDP3 'Future Housing and Employment Growth' that BDC have only identified 4,700 units from their overall 7,000 target, to be met on dwellings outside the Green Belt between 2011 and 2030. In particular it is noted that the adopted BDP Policy BDP4 commits to the allocation of the further 2,300 dwellings on land currently in the Green Belt and states that the Local Plan Review will identify land to help deliver the objectively assessed housing needs of the conurbation. To assist in this it is also noted that Policy BDP4 is explicit in referring to a "full review" of the Green Belt within Bromsgrove District in order to inform the delivery of the outstanding 2,300 dwellings which remain to be provided within the District up to 2030; to safeguard land beyond the current plan period, for 2030-2040 and assist with delivering the housing requirements of the West Midlands conurbation up to 2030.
- 1.10 It is therefore the case that Bromsgrove District Council is aware and is committed to reviewing its Local Plan in full to address the Greater Birmingham Housing Market Area issues, specifically the shortfall in addressing the unmet housing needs within this area, the scale of which has become clearer following the publication of the Greater Birmingham HMA Strategic Growth Study (February 2018). It is noted that the BDP states that the Local Plan Review will be completed by 2023 at the latest. It is considered that there needs to be some flexibility with the timing of the review of the APNP in this regard, as the APNP's timeframe is also to 2030 it may be the case that if the Local Plan Review proceeds with the inclusion of additional housing numbers at Alvechurch, to assist in meeting the above-mentioned needs, then policies in the Neighbourhood Plan may not be in conformity with the Local Plan Review and an early review of the APNP would be required, rather than in 2022/23 as suggested in Section 6.

2. SECTION 1: INTRODUCTION AND BACKGROUND

- 2.1 Gallagher Estates supports the formulation of the Neighbourhood Plan for Alvechurch and recognises that the Plan represents an opportunity for the local community to create a policy framework for delivering a sustainable future for the benefit of all who live, work and visit the village.
- 2.2 The emerging Neighbourhood Plan rightly identifies the need for the Plan to comply with European and National legislation and be in general conformity with existing strategic planning policy. However, it is noted that the planning policy framework at the national has recently been updated with the publication of the revised National Planning Policy Framework on 24th July 2018. It is contended that there remains the opportunity for the APNP to be updated and brought into line with this latest national guidance. This is explored in more detail below under the relevant topic headings.
- 2.3 Whilst it is recognised that the policies in the previous Framework will apply for the purpose of examining this neighbourhood plan (the APNP having been submitted before 24th January 2018, as per the guidance in Annex 1: Implementation, paragraph 214 of the new Framework), there is still a requirement for NP policies to be consistent with the new Framework. In addition, regard should be had to paragraph 212 of the new Framework, which advises that plans may need to be revised to reflect policy changes made by the replacement Framework, to be progressed as quickly as possible, either by a partial revision or by preparing a new plan. This is explored in more detail below under the relevant topic headings.
- 2.4 Furthermore, as set out above, the BDP will be subject to review in the near future, dependent upon updated evidence including the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against BDC's projected housing trajectory, which is also explored in more detail below.

Purpose of the Plan

- 2.5 The Alvechurch Parish Neighbourhood Plan (APNP) acknowledges Alvechurch as being one of the larger settlements in the Bromsgrove District area and that new housing development will be located at Alvechurch during the plan period to 2030. It is noted that the APNP sees the challenge as being "not to find a way to stop

development, but rather to manage change in the best way possible for the NP area". This approach is welcomed by Gallagher Estates and also the commitment given in the APNP to work closely with BDC in undertaking a review of the Green Belt as part of the Local Plan Review, as the APNP is explicit in acknowledging that Alvechurch parish only has Green Belt land available now for any significant future development.

- 2.6 The APNP sets out its principal purpose as being to help in determining planning applications in the Neighbourhood Area, covering the period 2011-2030. As well as housing development, the APNP includes policies for heritage, design and the natural environment, leisure, health and well-being, business shops and services, village centre improvements, transport and traffic management and a community action relating to future growth for the Parish.

Policy Context

- 2.7 It is noted that once 'made' the APNP will form part of the statutory Development Plan alongside the Bromsgrove Local Plan, which is currently in the process of being reviewed. The indicative timetable set out in Bromsgrove District Council's (BDC's) Local Development Scheme (LDS), to take account of the Strategic Growth Study and changes to national planning guidance, is as follows:

- Preferred Options – May/June 2018
- Call for Sites – September/October 2018
- Publication & Consultation on Preferred Options– May/June 2019
- Publication & Consultation on Pre-Submission Document – February/March 2020
- Submission to Secretary of State – May 2020
- Examination in Public – July 2020
- Adoption – January 2021

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- 2.8 However, as set out above slippage with this timetable may mean that the Call for Sites will take place around January/February 2019, with the Preferred Options consultation possibly following in September 2019.
- 2.9 It is the case that the Local Plan Review will assess the feasibility of options suggested for the District in the Greater Birmingham HMA Strategic Growth Study (February 2018). This is important in the context of the duty to co-operate and will require further work to be commissioned locally. Notwithstanding the fact that BDC have made a commitment to allocate 2,300 dwellings for the period 2023-2030, through the Local Plan Review the Strategic Growth Study is an important element of the evidence base for informing the overall quantum and spatial distribution of growth relevant to the District; specifically identifying and considering the distribution of housing growth to meet the unmet housing need confirmed within the wider Greater Birmingham Housing Market Area.
- 2.10 The Strategic Growth Study was published in February 2018 and concludes that as a minimum the housing requirement, taking account of Birmingham HMA and Coventry's unmet need, is for 208,000 dwellings to 2031 and 258,000 to 2036. The study has identified a housing supply of 180,000 dwellings across the HMA to 2031, and 198,000 to 2036 based on sites and supply currently identified. Based on current supply assumptions and proposed allocations in emerging plans the Study concludes that there is an **outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 to 2036** across the Birmingham HMA.
- 2.11 The Strategic Growth Study has identified that there is potential to increase the capacity of the potential housing supply by increasing densities to 40dph in conurbations and 35dph in other parts of the HMA which would lead to the existing source of supply providing an additional 13,000 dwellings over the period to 2031. Taking into account the increase in densities there still remains the need to identify sites capable of delivering over **15,000 homes to 2031, and a total of over 47,800 to 2036**. The Study sets out that this residual shortfall provides a clear basis for progressing a strategic review of the Birmingham Green Belt and considering land available within the HMA but beyond the Green Belt to inform councils plan-making activities.

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- 2.12 The Strategic Growth Study considers a number of strategic options to meet the outstanding shortfall which includes: Urban Extensions (1,500-7,500 dwellings); Employment-led Strategic Development (1,500-7,500 dwellings); and New Settlements (10,000+ dwellings). The Study identifies 24 Areas of Search in the HMA for strategic development. Of these 24 Search Areas, 11 of the options across the HMA are considered by the Study to warrant further assessment and feasibility work. These options comprise of 7 potential urban extensions (of between 1,500 and 7,500 dwellings) and 4 new settlements (of between 10,000 and 15,000 new dwellings). In addition, the options include 3 employment led options which offer the opportunity for some residential development alongside employment.
- 2.13 One of the Areas of Search, namely Area 23 'Between Birmingham and Bromsgrove/Redditch', is identified as a New Settlement with the potential to accommodate development of significant scale: 10,000-15,000 homes, noting that this area does fall within a location which makes a principal contribution to Green Belt.
- 2.14 As part of the evolution of the Local Plan Review BDC are tasked with considering and assessing the Areas of Search in further detail alongside identifying further small to medium sized sites to inform the Local Plan Review. In addition, the Strategic Growth Study sets out that LPAs may seek to explore strategic options which have not been considered by the Study if other opportunities arise from their own plan making processes.
- 2.15 Thus, in addition to the need for strategic sites, the Study acknowledges the need for LPAs to identify sites of a range of sizes, including smaller extensions to settlements of less than 2,500 homes, which will need to be established through local Green Belt reviews. BDC in their LDS state that the timeframe for carrying out the Green Belt Review is aligned with the timeframe for preparing and consulting on the District Plan Review; it being a crucial piece of the evidence base to inform proposals within the new Plan. The District Council are proposing to consult on a methodology for site selection, which will include the Green Belt Review, alongside the first options consultation on the Local Plan Review. Accordingly, it is considered important that the APNP needs to take into account of the implications of the Strategic Growth Study for the emerging policies of the Local Plan Review and

consequent scale of future development envisaged for the Neighbourhood Plan area.

- 2.16 Furthermore, as mentioned above a revised NPPF has recently been published on 24th July 2018 and regard should be had to the transitional arrangements set out in Annex 1: Implementation. For the purpose of examining this neighbourhood plan the policies in the previous Framework apply, with paragraph 16 advising that neighbourhoods should develop plans which support the strategic development needs set out in Local Plans, as well as plan positively to shape and direct non-strategic development.
- 2.17 Paragraphs 183 to 185 of the previous Framework set out guidance specifically relating to Neighbourhood Plans, advising that neighbourhood planning can give communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. It goes on to set out that Neighbourhood Plans should not promote less development than that set out in the strategic policies for the area or undermine those strategic policies. The APNP's approach to the level of housing delivery within the Neighbourhood Plan area is examined below, under Section 5 of these representations.
- 2.18 Section 6 of the previous NPPF reinforces the Government's objective to significantly boost the supply of homes. However, it should be noted that the revised NPPF advises that housing requirements are to be assessed utilising the standard methodology and in establishing this figure any needs that cannot be met within neighbouring authorities are also to be taken into account. Paragraph 65 of the revised NPPF sets out that that Strategic plans should set out a housing requirement for designated neighbourhood areas, within their overall housing requirement, which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Where this is not possible local planning authorities are expected to provide an indicative figure, if requested to do so by the neighbourhood planning body. This may be because the neighbourhood area is designated at a late stage in the strategic policy-making process or after strategic policies have been adopted. In the case of the APNP, should the review of the BDP set out a housing requirement for this designated neighbourhood area, then a review of the APNP will be required.

- 2.19 The revised NPPF has also set out that Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (no larger than 1 hectare) suitable for housing in their area.
- 2.20 It is therefore considered that in order to meet the first of the Basic Conditions (i.e. the NP has regard to national planning policy guidance), the APNP should take the opportunity to consider amendments to align more closely with the NPPF.
- 2.21 Thus, in light of the recent publication of the Strategic Growth Study, the recently published NPPF changes to national guidance relating to Neighbourhood Plans and the emerging Bromsgrove District Local Plan Review, the APNP can provide little certainty in respect of the level of growth that may be directed to the Neighbourhood Area in the longer term.

3. SECTION 2: ALVECHURCH - TODAY

- 3.1 This section of the APNP considers Alvechurch Parish, the fact that the Parish, except for the built-up area of the Alvechurch village itself, is washed over by Green Belt, and that future development with the NP area will mean land being taken out of Green Belt via the Bromsgrove District Local Plan Review. It is noted that the APNP acknowledges that it cannot change the Green Belt boundary in the Parish, but that rather can be used as a vehicle for influencing any Green Belt changes that may be required. The APNP also recognises that if Alvechurch village is to have more sustainable and affordable housing after 2023 for its young people and for elderly people to downsize to, then land around the edge of the village will need to be released, and this pragmatic approach to neighbourhood planning is welcomed by Gallagher Estates.

4. SECTION 3: THE VISION AND THE KEY AIMS

The Vision Statement

- 4.1 The vision for Alvechurch is supported, and it is noted that there is an emphasis on encouraging development which promotes, protects and improves the main historic village of Alvechurch and its outlying settlements, as well as the built and the natural environment. Also supported is the recognition of the APNP of the need for change and the management of that change to ensure the conservation and enhancement of the parish's traditional character and sense of place.

Neighbourhood Plan Key Aims

- 4.2 Similarly, the key aims of the Neighbourhood Plan are supported; particularly Key Aim 1 which aims to secure development that meets current and future needs of all age groups in a changing and growing Alvechurch parish community, whilst embracing high quality design.

General Policy 1

- 4.3 There appears to be two policies titled 'General Policy' contained at pages 24 and 25. The policy on page 24 places a requirement for the Parish Council to inform the community about planning and actively involve local people in the planning process. This policy reads as a 'Key Aim' of the APNP and serves no purpose in guiding development within the Parish. We would therefore recommend the deletion of this policy, particularly as consultation is covered by 'Key Aim 2' and General Policy 1 as contained on page 25.

5. SECTION 4: THE POLICIES OF THE APNP

TOPIC 1 – POLICIES FOR HOUSING

- 5.1 The **Introduction** to this section states that Alvechurch Parish, through the APNP, is looking to plan positively to meet future sustainable housing growth and support district housing numbers as set out in the Bromsgrove District Local Plan 2011-2030. It goes on to state that the APNP will respond positively to the need for new homes when that time arises, and these intentions are very much welcomed by Gallagher Estates.
- 5.2 The Introduction to the 'Policies for Housing' section also notes that for any substantial future development to take place, the Alvechurch Village boundary would need to be enlarged through the release of land from the surrounding Green Belt through a local authority-led Green Belt and Bromsgrove District Plan Review and that this would probably be in the long term i.e. post 2023. The land off Station Road, Alvechurch (see Site Plan attached at **Appendix 1**) lies within the Green Belt to the south of Alvechurch Village and could therefore form part of the provision for long-term housing growth within the District.
- 5.3 **Policy H1: Locations for New Housing Development**
- 5.4 This policy is clearly intended to guide the location for new housing development within the Neighbourhood Plan area, and therefore will play a key role in the development management process. However, as currently worded the policy is unclear and fails to give the reader clarity in terms of the locations where the principle of housing development will be accepted. We therefore do not consider that it complies with paragraphs 154 or 157 of the NPPF.
- 5.5 We note that 'Criteria a' limits development solely to Alvechurch Village. This is too restrictive. The title of the policy implies that it will guide the location of new housing across the Parish, and a policy prepared on this basis would be entirely appropriate; however, the main body of the policy suggests that Policy H1 only applies to the village of Alvechurch. Clearly there are other settlements within the Parish that can reasonably expect to see some development, such as Rowney Green, Hopwood and Bordesley. Whilst it is acknowledged that Policy H2 seeks to address housing in Hopwood and Rowney Green, we believe that for clarity, a single

policy directing the location of housing across the Parish would be more consistent with the 2012 NPPF.

- 5.6 The previous NPPF (paragraph 54) is also clear that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, and this is reiterated in paragraph 78 of the revised NPPF. We would therefore suggest the policy is amended so that the principal of housing development is accepted in all settlements within the Parish with Alvechurch the focus for growth as it is the most sustainable settlement.
- 5.7 'Criteria e' seeks to control development boundaries. This is not a matter that should influence the principle of development. In most cases sites that come forward for development will be defined by ownership or land control. We therefore believe that 'Criteria e' should be deleted as there is no strategic or national policy basis for this approach.
- 5.8 'Criteria f' seeks to preserve the setting or enhance the setting of the local landscape, natural environment or heritage assets. These issues are dealt with by other policies in the APNP and therefore it is not necessary to include this criteria within the policy intended to direct the location of housing development.
- 5.9 'Criteria g' relates to design considerations, and these issues are covered by Policy H4. There is no need to incorporate these provisions within Policy H1 therefore 'Criteria g' should be deleted.
- 5.10 'Criteria i' states that to meet sustainable criteria new development should be located within 15 minutes and no more than 20 minutes comfortable walk to the village centre. Whilst access to services and facilities is important to promote opportunities for walking, cycling and public transport, there is no justification for setting prescriptive journey times within national planning policy or the Bromsgrove District Local Plan, and we also note that it also conflicts with draft Policy GAT 1 APNP. We therefore believe 'Criteria I' should be deleted.
- 5.11 The final paragraph of Policy H1 relates to development in the Green Belt, however this is covered by paragraphs 89 and 90 of the previous NPPF (carried through as paragraphs 145 and 146 of the new NPPF) and Policy BDP4 of the Bromsgrove District Local Plan. It is therefore considered that this paragraph is not necessary

to control development and should be deleted in order to conform with the NPPF paragraph 185, and the basis conditions.

- 5.12 We note at paragraph 4.28 - that the APNP recognises that in the long term, post 2023, the village settlement area could change if land is released from the Green Belt, following Bromsgrove District Council's Local Plan Review, and the Green Belt Review that will inform the Local Plan Review. Acknowledgement of this long-term situation is welcomed.
- 5.13 **Policy H4: Housing Design Principles** establishes an extensive framework to guide all future housing developments, viewing them as an opportunity to enhance the built environment and improve the quality of the design aesthetic within Alvechurch Parish. It is noted that the revised NPPF has strengthened guidance in relation to design so the approach the Parish Council are taking to try and improve design quality is supported by national policy.
- 5.14 Whilst Gallagher Estates supports the objective of improving design quality as a means of achieving sustainable development, we are concerned that the current wording of Policy H4 is repetitious and should be simplified. For example, points 1, 2, 5 and 7I all place a requirement for new housing development to respond positively to local character. There is no need to repeat these objectives.
- 5.15 We note that Policy H4 encourages new developments to achieve "Building for Life" and "Secured by Design" standards; however there needs to be recognition that this has the potential to impact on viability. The policy should therefore encourage these standards, subject to viability.
- 5.16 **Policy H5: Sustainable Development Through Design** seeks to encourage development which achieves high standards of sustainability and it is acknowledged that encouragement is given to developers to achieve higher standards than is required nationally. However, this will be subject to many other factors, including the viability of a specific development.
- 5.17 We also note that draft Policy H5 seeks to control external lighting and states that inappropriate external lighting will be discouraged. The policy does not clarify what constitutes "inappropriate development" in which case Policy H5 is unlikely to be effective. The policy should clarify that only lighting schemes that would cause

light pollution that would materially harm the amenities of neighbouring properties that would justify refusal.

- 5.18 **Policy H6: Providing a Mix of Housing Types and Sizes** refers to the BDLP and the identified need for 2 and 3 bedroom properties in the District, seeking to ensure that future housing delivers a better balanced mix of property types, sizes and tenures to meet the specific housing needs of Alvechurch Parish in the future. Whilst Gallagher Estates supports the provision of a range of housing types, sizes and tenures, it is noted that the policy should be amended to reflect the paragraph 64 of the recently published NPPF, which, for major housing development, requires planning policies to expect at least 10% of the homes to be available for affordable home ownership (subject to certain exceptions). It is recognised however that policy BDP8 of the Local Plan will also need updating through the Local Plan Review, to take account of the recent changes to national policy in this regard and that a review of the APNP should also reflect this requirement.
- 5.19 We note that parts 1, 3 and 4 of Policy H6 all require new housing developments to provide a mix of house types. Part 3 prescribes the following mix of accommodation:
- a. 10% 1 bedroom;
 - b. 40% 2 bedroom with an element of single level living to meet needs of the elderly;
 - c. 40% 3 bedroom; and
 - d. 10% 4 or more dwellings.
- 5.20 It is not clear what the evidence base is for this mix, or whether it has been tested to assess what impact it would have on viability, but unless there is specific evidence to support the mix outlined, we would recommend that it is deleted, and that housing mix is determined by evidence such as the Bromsgrove District Strategic Housing Market Assessment or any other local evidence of housing need. In which case Parts 1 and 4 of the Policy would still ensure that a mix of housing.

5.21 **Policy H7: New Housing, Improved Services and Facilities** states that housing developments that make provision for new or improved services and facilities will be considered favourably. It is the case that national and local policy is such that developer contributions will be required, either through S106 Agreements or through CIL, to fund identified infrastructure projects and improvements. However, financial contributions via planning obligations can only be collected if the requirement meets the three criteria set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010, namely the contributions:

- are necessary to make the development acceptable in planning terms
- directly related to the development and
- fairly and reasonably related in scale and kind to the development

5.22 This is repeated in Paragraph 204 of the NPPF and carried through into paragraph 56 of the revised NPPF. Furthermore, due to pooling restrictions, a local planning authority is only able to collect a maximum of five contributions to any one project.

5.23 It is our view that as currently worded Policy H7 does not meet the basic conditions and should be deleted given the legislative restrictions on what basis financial contributions can be sought.

TOPIC 2 - POLICIES FOR HERITAGE, DESIGN AND THE NATURAL ENVIRONMENT

- 5.24 This topic briefly looks at the history of the Parish and the Alvechurch Village Conservation Area. With regard to **Policy HDNE 1: Built Heritage and Local Character** the policy requires that all development proposals for Alvechurch Parish should continue to maintain, conserve and enhance built heritage assets of the parish and their settings and for non-designated heritage assets that development proposals should take account of the scale of any harm or loss to the significance of the heritage assets. However, it is considered that Policy HDNE 1 should be amended to reflect national guidance more closely, allowing for the weighing of harm against public benefit for designated heritage assets (as set out within Paragraph 196 of the NPPF) or a balanced judgement with regards to harm to non-designated heritage assets (see NPPF Paragraph 197). Indeed, Policy HDNE1 as drafted is considered to be overly restrictive compared to the NPPF and would have limited weight in the decision-making process determining planning applications.
- 5.25 Again, **Policy HDNE 2: Local Distinctiveness** imposes a test which is not fully aligned to national planning policy. Instead of requiring assessment of the impact on the significance of any heritage asset that may be affected by a proposal for new development, rather the policy requires that new development within, or adjacent to, or directly affecting a Conservation Area, a heritage asset, building or feature of historic interest, or an area of public open space, should be sensitively designed to conserve and enhance the setting, form, character and sense of place. Whilst the objective of maintaining local distinctiveness is supported by Gallagher Estates, it is considered that the policy should be amended to bring it into line with the NPPF.
- 5.26 It is also noted that the "definitive list" which contains local heritage assets is not appended to the consultation version of the document. It is therefore not possible to determine which buildings and structures will be affected by Policy HDNE1; however, people should be consulted on this list of local heritage assets.
- 5.27 **Policy HDNE 3: The Alvechurch Parish Village Design Statement** seeks the protection and enhancement of the Neighbourhood Area through the positive use of the Alvechurch Parish Design Statement (August 2017) with development

proposals having regard to this document. It is noted that Paragraph 125 of the NPPF states that neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development. Although it is recognised that the Alvechurch Village Design Statement has been updated since first being adopted by Bromsgrove District Council as a Supplementary Planning document to the Bromsgrove Local Plan 2004, further updating may be required through a review of the APNP in the light of the revised NPPF.

5.28 Policy HDNE 4: Protecting Landscape and Open Views lists several views within the Neighbourhood Area which are considered locally to be of importance and desirable to protect from development. However, it is clear from the APNP that these landscapes were recorded during a walk around the boundary of Alvechurch Village by members of the APNP Steering Group and volunteers from the local community, rather than from an evidenced based assessment of the landscape character across the District. Furthermore, in relation to this APNP policy, no mention is made of Policy BDP21 of the Bromsgrove District Local Plan, nor to Worcestershire County Council's Landscape Character Assessment or the Landscape Character Supplementary Guidance; evidence which ought to inform any such policy protection for landscapes within the Neighbourhood Plan area.

5.29 The previous NPPF at paragraph 109 refers to the planning system contributing to and enhancing the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils. Although no guidance is provided on what constitutes a 'valued landscape' the revised NPPF has added that this should be in a manner commensurate with their statutory status or identified in the development plan. This infers that where a landscape is deemed to be "valued" it should be afforded some degree of statutory protection appropriate to its significance. In the absence of any evidence these landscapes should not be afforded development plan protection.

5.30 In relation to the important views listed in Policy HDNE 4, View G. 'From Station Road and the Salt Way footpath across fields Southwards to Peck Wood and Shortwood' does not contain any landscape designations or landscape-related designations. In the light of the fact that no evidence has been advanced to support the protection of the landscape in this area it is considered that the value of this

undesigned landscape is therefore entirely subjective, and it is considered that the Policy HDNE 4 is unduly restrictive in its approach and would in effect sterilise much of the land around Alvechurch from future development. Furthermore, having regard to 'Guidelines for Landscape and Visual Impact Assessment, Third Edition, (GLVIA3), produced in 2013, which deals with the value of undesigned landscapes, an assessment of the landscape in this area has been undertaken on behalf of Gallagher Estates by Pegasus Landscape Team. With regard to land off Station Road, Alvechurch, which lies within View G, it is the case that in general the site and its context are relatively well contained within views towards it being short or medium distance. Occasional long-distance views are limited and only gained from specific locations, as demonstrated by the Landscape and Visual Statement contained at **Appendix C**. As the Illustrative Masterplan seeks to demonstrate, development of the site would be sympathetic to the topography of the site and sensitively designed to integrate with the surrounding existing environment and the wider landscape.

- 5.31 **Policy HDNE 5: Access to the Countryside** seeks to ensure that new development contributes to and connects to the green networks in the District. In terms of connectivity to the River Arrow and the wider countryside it is the case that the development of the land off Station Road, Alvechurch would afford opportunities to connect to and improve linkages between green spaces, thereby improving public access to the countryside.
- 5.32 With respect to **Policy HDNE 6: Protection and Enhancement of the Natural Environment** this policy sets out requirements for new development in relation to impacts on wildlife, habitats, trees and hedgerows. Whilst the intention of the policy is supported, Gallagher Estates consider the policy to contain many issues which would normally be addressed through a detailed planning application, or at Reserve Matters stage, such as wildlife mitigation measures in residential gardens.

TOPIC 3 - POLICIES FOR LEISURE, HEALTH AND WELL-BEING

- 5.33 **Policy LHW 3: Improvement to, and Protection of, Open Spaces** and **Policy LHW 4: Sport, Leisure and Recreation Facilities** seek to enable all residents to have healthy and active lifestyles. It is noted that Policy LHW 4 encourages all new residential development of 10 homes or more to contribute towards the provision of new, and improvement of existing, public open space, sport and recreation facilities, provided these proposals do not constitute inappropriate development in the Green Belt. The inclusion of this provision within the policy is considered to be unnecessary, as any development proposed within Green Belt would need to come through the Development plan process as an allocation, and thus the site would therefore be removed from the Green Belt prior to development.

TOPIC 4 - POLICIES FOR BUSINESS, SHOPS AND SERVICES

- 5.34 **Policy BSS 5: Communications Infrastructure** states that proposals for major residential development must contain a 'Connectivity Statement', demonstrating how the proposal takes communications connectivity into account. Whilst the aspiration of this policy is supported by Gallagher Estates it is considered that this is a detailed requirement which would be more appropriately addressed through planning conditions or at the Reserved Matters stage of the planning process, as many applications will be outline in form and will only be able to give high level commitment to such matters. Indeed, although the revised NPPF refers to planning policies supporting the expansion of electronic communication networks, neither this, nor the adopted Bromsgrove District Local Plan, make reference to such statements nor is it an application validation requirement.

TOPIC 5 - POLICIES FOR GETTING AROUND – TRANSPORT

- 5.35 **Policy GAT 1: Getting Around** states that proposals for development should identify the realistic levels of traffic they are likely to generate and must assess the potential impact on the local community. Gallagher Estates are supportive of this policy and the development proposals for land off Station Road, Alvechurch will identify traffic impacts and incorporate measures to ensure that the local transport networks function efficiently. Furthermore, it is the case that all development that will generate significant amounts of traffic movement is required to provide a travel plan and be supported by a transport statement or assessment, in line with paragraph 32 of the previous NPPF and Policy BDP1 Sustainable Development Principles of the Bromsgrove District Local Plan. It is also considered that some of the considerations listed in Policy GAT 1, such as the provision of enhanced public transport, pedestrian crossing points, financial contributions for local infrastructure enhancement, and infrastructure of charging electric vehicles, are all matters which would be addressed through the detailed planning application process, in conjunction with the highway authority.
- 5.36 In relation to **Policy GAT 3: Improving Road Safety and Traffic Management** it should be noted that the NPPF advises that development can only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact of development on the road network would be severe. In this respect criteria 4 of Policy GAT 3 is therefore considered to be an unnecessary inclusion within this policy.

6. TOPIC 5: FUTURE GROWTH IN THE PARISH

- 6.1 It is noted that this section of the APNP does not contain any policies, and just one community action which gives a commitment from Alvechurch Parish Council to work pro-actively with BDC through the Local Plan Review. Furthermore, the commitment given to review the NP at that time and this partnership approach to establishing areas of land that could support future housing numbers that BDC allocates to Alvechurch is fully supported as a positive step by Gallagher Estates.
- 6.2 The 'Background information' given on this Community Action refers to the NPPF being clear that Green Belt reviews are matters only for local plans and not for neighbourhood plans. However, it is recognised that this was drafted under the guidance of the previous NPPF, and whilst this remains the case, it should be noted that the revised NPPF now advises that where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. It is therefore considered that the NP should be amended accordingly.

7. SECTION 6: MONITORING AND REVIEW OF THE PLAN

- 7.1 The recognition that the Neighbourhood Plan will need to be revisited to ensure relevance and to monitor delivery is welcomed. Under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) there is a legal requirement for local planning authorities to review local plans at least once every five years from their adoption date to ensure the policies remain relevant and effectively address the needs of the community, in particular the need for housing. It is of note that the revised NPPF also refers to this Regulation and advises that policies in local plans should be reviewed every five years, taking account of changing circumstances in their area, or any relevant changes in national policy.
- 7.2 It is noted that the APNP is proposed to be reviewed every five years, with the first review likely to take place in 2022/23. However, it is considered that the recent publication of the revised NPPF coming before the adoption of this NP, gives the opportunity for amendments and updates to be made now to bring it into line with national planning policy. In addition, if the Neighbourhood Plan is, as suggested, brought forward prior to the District Council's Local Plan Review, it should be immediately reviewed on adoption of a new Local Plan for the District to ensure consistency. Furthermore, any review of the APNP will also need to have regard to amendments to national planning policy contained within the recently published NPPF.
- 7.3 Furthermore, it is noted that the neighbourhood plan period is proposed to cover the timescale through to 2030. Whilst this is aligned to the adopted Local Plan period, and also to the emerging Bromsgrove District Local Plan Review period of 2023-2030, this will also consider safeguarded land beyond the current plan period for 2030-2040, and thus it is therefore likely that the APNP will require reviewing very soon after being made.

8. LAND OFF STATION ROAD, ALVECHURCH

- 8.1 Gallagher Estates Ltd has a controlling interest in land off Station Road, Alvechurch (site location plan attached at **Appendix A**) and an Illustrative Masterplan is included as **Appendix B** to these representations.
- 8.2 As identified on the Illustrative Masterplan the total site area extends to approximately 28.48 hectares, with the total area indicated for residential development extending to some 13 hectares (net).
- 8.3 The site is bounded by the Cross-City rail line to the west, to the rear of existing development off School Lane to the north, Redditch Road to the east and agricultural land to the south. The proposals seek to maintain views through the site to the open countryside beyond.
- 8.4 Public open space would be encompassed within the development, together with a wide landscape buffer between residential development in the west of the site and the railway corridor. The development would be set within a strong landscape framework; ensuring that the development's soft edges would blend with the surrounding countryside.
- 8.5 The site is sustainably located on the edge of Alvechurch Village and has good access to a range of services and facilities, including a footpath link to Alvechurch Railway Station, a convenience store, pubs, Crown Meadow First School, Alvechurch C of E Middle School, Alvechurch Sports and Social Club and Alvechurch & Hopwood Cricket Club. Alvechurch station lies on the Cross-City Rail Line and offers access to both Redditch and Birmingham by rail and Birmingham can also be accessed from the village by the 146 bus service via Redditch.
- 8.6 The site could deliver in the region of 300 dwellings, assuming the provision of a mix of dwellings including smaller properties ideal for 'first time buyers' and 'downsizers', as well as a number of 2 and 3 bedroom properties ideal for younger couples/families.
- 8.7 As indicated on the accompanying Illustrative Masterplan at **Appendix B** the development proposals would include in summary:

- The provision of a range of dwelling types and affordable housing which would assist in meeting the District's housing needs and local village needs in a sustainable location;
- The creation of a landscape-led development that responds positively to the character of Alvechurch;
- The creation of a development that is well connected, readily understood and easily navigated, promoting a layout which reduces dependence on the car and links to pedestrian and public transport networks;
- The creation of a strong landscape and open space structure, linking with the adjoining development, retaining existing hedgerows and trees wherever possible, with green spaces integrated within the site, creating ecology corridors and providing new wildlife habitats;
- The provision of a comprehensive pedestrian footpath network, retaining and enhancing the existing public rights of way that adjoin the site and providing links between local facilities and the development, as well as maintaining access to Alvechurch Station and the countryside beyond.

Suitability

- 8.8 Alvechurch is identified as a "large settlement" under Policy BDP2, and therefore one of the more sustainable locations for development within the District.
- 8.9 Land off Station Road is situated in close proximity to services and facilities and has excellent access to Alvechurch train station allowing for access to public transport services.
- 8.10 The Site is located in Flood Zone 1, and there not at risk of flooding. With the exception of Green Belt policy, there are no other planning constraints that would prevent development coming forward.

Role of the Site in the Green Belt

8.11 The site is located within the area designated as Green Belt on the southern edge of the village of Alvechurch. In relation to Green Belt the NPPF states:

“...The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.”

8.12 Green Belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

8.13 An assessment of the Site and the development proposals against the five purposes of including land in the Green Belt is set out at Table 1 below.

8.14 When altering the Green Belt boundaries through the Local Plan, the paragraph 83 states that “authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

8.15 With regard to drawing up or review Green Belt boundaries, the following paragraph emphasis that “local planning authorities should take account of the need to promote sustainable patterns of development”. This means identifying site that accessible to services and facilities

8.16 In paragraph 85, the NPPF sets out key principles when defining boundaries. They include:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development; and
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

8.17 In reviewing Green Belt boundaries, local planning authorities have the ability to allocate and safeguard land for development through the Local Plan process. And in the case of the APNP, Community Action 8 clearly underlines Alvechurch Parish Council's commitment to work with Bromsgrove District Council to identify suitable and achievable sites within the Parish. Table 1 assesses land at Bordesley against the five purposes of retaining land within the Green Belt. It is considered that the site could be released without having an unacceptable impact on the function of the Green Belt, and Gallagher respectfully request that land at Bordesley is considered as work progresses in identifying suitable sites for future growth.

Green Belt Purpose	Summary response
To check the unrestricted sprawl of large built-up areas	There is ribbon development in the vicinity of the site along Redditch Road to the east with the Redditch-Birmingham railway line and Alvechurch station to the west. To the north is the village of Alvechurch itself. It is clear that there is already urbanising features

	<p>within the landscape on the southern edge of the settlement.</p> <p>Development of the site will not lead to unrestricted sprawl of the built-up area as it will be contained within a framework of existing and proposed green infrastructure that will provide a defensible boundary.</p>
To prevent neighbouring towns merging into one another	The nearest town or large settlement is directly to the south with Redditch located some 3.3km from the site. Development of land off Station Road would maintain the integrity of the settlement and would not result in coalescence that would undermine the purposes of retaining land within the Green Belt.
To assist in safeguarding the countryside from encroachment	<p>The landscape of the site and to the south is generally characterised by countryside, consisting of farmland bordered by hedgerows and hedgerow trees. To the north is the existing settlement of Alvechurch which extends along Redditch Road to the east.</p> <p>The majority of the existing vegetation will be retained, and together with a robust green infrastructure strategy, development can be located within a comprehensive landscape setting.</p>
To preserve the setting and special character of historic towns	The site is not located within a historic town. The village is of historic interest, but development the site is capable of being developed without harming the special character of the settlement.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	There is a finite supply of sites within the urban area to meet future growth needs, therefore the Bromsgrove Local Plan recognises the need for Green Belt release.

Table 1

Deliverability

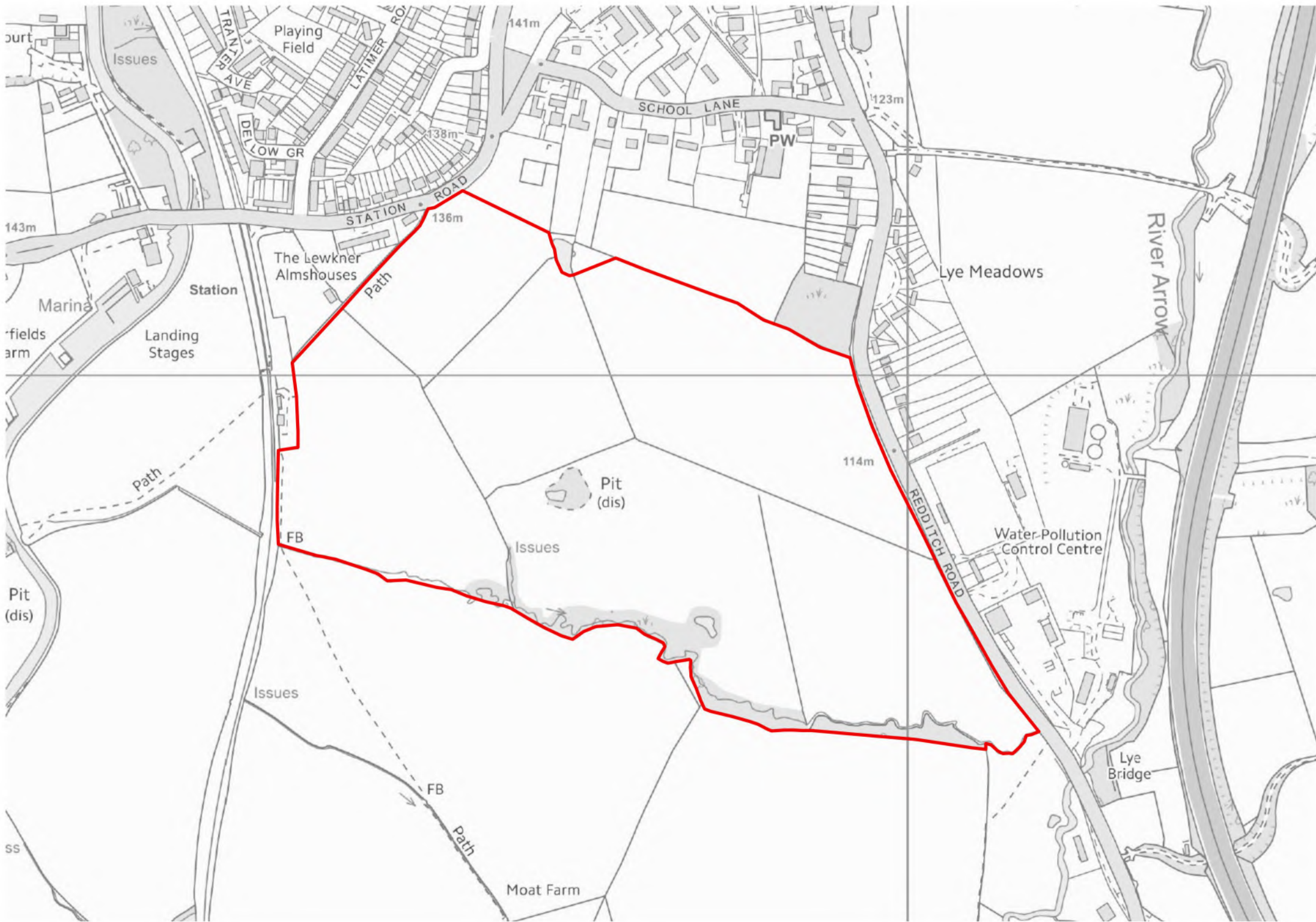
8.18 Gallagher Estates Ltd has acquired interests in this site and can confirm that there are no land ownership or legal issues which would prevent a development proposal being implemented. The site is available now and represents a viable proposition for residential development. The site will continue to be promoted through the District Council’s Local Plan Review process.

- 8.19 The site off Station Road, Alvechurch represents a sustainable urban extension to the southern edge of the village and has the ability to accommodate a range of homes to assist in meeting locally derived needs within the Neighbourhood Area in the long term, that would deliver many of the objectives of the local community, as set out in the Key Aims of the Neighbourhood Plan.
- 8.20 Accordingly, the Parish Council is invited to support the land off Station Road, Alvechurch, as defined on the location at Appendix A, as a location for future housing development within Alvechurch Parish.

9. CONCLUSIONS

- 9.1 Gallagher Estates supports the preparation of the Alvechurch Parish Neighbourhood Plan as it provides a positive opportunity for the local community to have greater influence on the form and location of new development.
- 9.2 It is noted that the appropriate level of additional housing to be focused to the Alvechurch Parish Neighbourhood Area will be determined through the District Council's Local Plan Review, which will be influenced by technical evidence still to be published and the recently published changes to national planning guidance. It is therefore considered that the APNP should be amended to include acknowledgement of this changing policy position and also acknowledge that an early review may be required in order to align APNP policies more closely to those of the revised NPPF and the Local Plan Review.
- 9.3 It is the case that the land off Station Road, Alvechurch, represents a significant opportunity to build on the infrastructure that currently exists at Alvechurch and to create a sensitively designed extension to the village, with appropriate open space provision and linkages to the wider community. The site has the ability to accommodate a range of homes to assist in meeting locally derived needs within the Neighbourhood Area, including starter homes, homes for families and for those looking to downsize.
- 9.4 Gallagher Estates welcomes this opportunity to comment on the Alvechurch Parish Neighbourhood Plan and would welcome further positive dialogue with Alvechurch Parish Council and the local community in respect of the emerging Neighbourhood Plan. Gallagher Estates will continue to promote the land off Station Road, Alvechurch as a 'sound' housing allocation through the Local Plan Review and seeks the support of Alvechurch Parish Council in promoting this as a suitable location for development through the Development Plan process.

APPENDIX A
Site Location Plan



APPENDIX B
Illustrative Masterplan



KEY			
	SITE BOUNDARY		INDICATIVE EXISTING VEGETATION
	DEVELOPMENT PARCELS		INDICATIVE LANDSCAPING
	EXISTING ROAD NETWORK		EXISTING WATER BODY
	PRIMARY ROUTE		WATER ATTENUATION
	SECONDARY ROUTE		POCKET PARK
	TERTIARY ROUTE		
	PUBLIC RIGHT OF WAY		
	SLUDS		

LAND OFF STATION ROAD, ALVECHURCH - ILLUSTRATIVE MASTERPLAN



APPENDIX C

Landscape and Visual Statement

LANDSCAPE AND VISUAL STATEMENT

LAND OFF STATION ROAD, ALVECHURCH

ON BEHALF OF GALLAGHER ESTATES LTD

Pegasus Group

5 The Priory | Old London Road | Canwell | Sutton Coldfield | B75 5SH

T 0121 308 9570 | **F** 0121 323 2215 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
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FIGURES:

FIGURE 1: PROVISIONAL DEVELOPMENT FRAMEWORK AND GREEN INFRASTRUCTURE

1. INTRODUCTION

- 1.1 Pegasus Group has undertaken a preliminary appraisal of the landscape and visual constraints and opportunities in respect of the proposed development of Land at off Station Road, Alvechurch.
- 1.2 There are two matters in relation to the acceptability of the site in landscape and visual terms, firstly the capacity of the site to accommodate development without undue consequences for the baseline and, secondly, the current Green Belt designation and the role of the site in relation to its function and contribution to the Green Belt.

Scope of the Appraisal

- 1.3 This preliminary landscape and visual appraisal has been undertaken to determine the various landscape and visual constraints and opportunities of the site. The preliminary LVA aims to test the landscape capacity of the site and also to its current role in the Green Belt, and will review this in the context of the existing character and visual amenity of the site and surrounding landscape. This is done with reference to the existing evidence base which covers these matters. The preliminary LVA will utilise the analysis to define a provisional approach to a landscape and visual green infrastructure strategy for the site and how this will continue to maintain the Green Belt in the area immediately surrounding the site.
- 1.4 This appraisal has been completed using both desk study and site survey techniques. Field work was carried out in July 2018 in order to review the existing landscape baseline and character of the site and its surrounding context. Where applicable, the concepts and procedures set out in the Guidelines for Landscape and Visual Impact Assessment (3rd Edition, April 2013) have been adopted.

1.5

2. LANDSCAPE AND VISUAL BASELINE

2.1 This section takes a closer look at the landscape and visual baseline of the site and its context; this is then considered against the evidence base in order to develop a landscape strategy which can be applied to future development proposals and ensure that a forthcoming scheme is appropriate to the emerging policy background, respects local landscape character and therefore contributes to the environmental dimension of the NPPF.

Site Overview

2.2 The site is located on the southern edge of Alvechurch, south of the M42 between the large urban settlements of Birmingham to the north and Redditch to the south. The site comprises a series of irregular field enclosures defined to the east by existing residential and industrial development along Redditch Road; to the south by a stream (a tributary to the River Arrow); to the west by a railway line and Alvechurch rail station; and to the north by the rear boundaries of properties along Station Road, and the field boundaries.

2.3 As such, the site shares a relationship with the existing urban edge along its eastern, northern and western boundaries. To the south, the site is set adjacent to the undeveloped countryside but is defined by mature vegetation lining the stream.

Site Description

2.4 The landform of the site forms a broadly consistent slope with some localised undulations, falling from ca. 135m AOD (above ordnance datum) at the north-western part of the site, down to 110m AOD along its south-eastern boundary.

2.5 As set out previously, water features on site include the stream that runs along the southern boundary towards the River Arrow. There are also two small field ponds. Vegetation cover associated with the site is concentrated along its boundaries, along watercourses and along the field boundaries. The immediate context of the site is also well vegetated; to the west vegetation lines the railway and mature tree belts are also associated with the Worcester and Birmingham Canal just beyond the railway line; the rear gardens of properties along School Lane to the north; and along Redditch Road and the A441 to the east.

2.6 In terms of access, a public right of way (public footpath) passes along the north-western boundary of the site; this connects to Alvechurch station and splits into

two routes; one heading south-west towards the canal and one heading south towards Grange Lane.

- 2.7 The site is currently included as part of the West Midlands Green Belt. There are no landscape specific designations which cover the site or the immediate area.

Landscape Character

- 2.8 At a national level, the site and its surrounds are located within National Character Area Profile 97: Arden, as published by Natural England (2012). Landscape character at a local level is defined by the Worcestershire Landscape Character Assessment. The site is located within the Wooded Estatelands Landscape Type; its key characteristics can be summarised as follows:

- Large discrete blocks of irregularly-shaped woodland;
- Mixed farming land use Secondary;
- Rolling topography with occasional steep-sided hills and low escarpments;
- Semi-regular pattern of large, hedged fields;
- Woodland of ancient character;
- Discrete settlement clusters often in the form of small estate villages;
- Medium distance framed views; and
- Large country houses set in parkland and ornamental grounds.

- 2.9 At a more detailed level, the site is located within the Bordesley Wooded Estatelands Landscape Description Unit, described by the published assessment as:

2.10 *"a soft rock area of mixed mudstones and sandstones, with free draining, mixed brown soils and an intermediate, undulating topography. The land use is pastoral and the tree cover comprises interlocking, or frequent, usually large, discrete blocks of ancient woodland. The settlement pattern is one of farmsteads and strings of wayside dwellings associated with a moderate to high level of dispersal and a small to medium scale field pattern."*

- 2.11 In relation to condition, the published assessment provides the following summary:

- moderate intensity mixed farming with a declining field pattern with boundaries in poor condition;

- overall inconsistent and under-representation of woodland cover;
- localised high impact of modern ribbon development along roads noticeable in eastern half; and
- localised high impact of urban development associated with prison complex.

Visual Amenity

- 2.12 The following section describes the visual relationship between the site and the surrounding landscape in relation to the inter-visibility of the area and the nature and extent of potential views.
- 2.13 In visual terms the lower extents of the site and its context are relatively well contained from the wider landscape, with views towards these areas generally being of short distance. This is due to the falling topography, in combination with the mature vegetation along Redditch Road and the stream corridor to the south. The sites upper extents are more visible generally and can just be seen from locations such as the railway bridge at Grange Lane to the south and is likely to be seen from more elevated topography at Rowney Green to the east and Cobley Hill to the west. However, the site will appear as a very small part of the overall panorama in these views. There are also localised undulations in the landform on the site itself and in the local area which will result in variation in terms of how much of the site can be seen.
- 2.14 In terms of the visual envelope, from the north the site is contained by the existing settlement edge of Alvechurch, including properties along Station Road; to the west by rising topography and ridgeline beyond the canal at Cobley Hill; to the south by the local layering of vegetation, including that along the southern boundary of the site; and to the east by existing built form along Redditch Road, and further east by rising landform towards Newbourne Hill and Rowney Green.
- 2.15 Where views towards the site are available, visual receptors in the area include those occupying the local settlement edge and those using the local public right of way network.

3. LANDSCAPE AND VISUAL ANALYSIS

3.1 The following section sets out a brief analysis of the constraints and opportunities for the site and subsequently an outline landscape strategy. The landscape strategy will present an appropriate framework on which future development proposals can be brought forward in a way that aims to minimise potential impacts and is acceptable in landscape and visual terms.

Landscape and Visual Constraints and Opportunities

3.2 The constraints and opportunities for the site and its surrounding landscape context have been identified following the review of baseline information on landscape and visual matters. These can be used to help identify and define a robust and appropriate development envelope for the site.

3.3 It should be noted that landscape and visual constraints can be used to guide the development of a proposal in a positive manner, often leading to opportunities and not just creating absolute constraints to development. The constraints for the site are considered to be:

- The location of the site within the Green Belt, which will have some influence on the value of the local landscape;
- The presence of a public right of way passing along the north-western boundary of the site (providing recreational opportunities for potential high sensitivity receptors); and
- The relationship between the site and surrounding countryside to the south and west in landscape character terms.

3.4 Landscape and visual opportunities can be summarised as follows:

- Notwithstanding that the site is located within Green Belt, there are no overriding statutory landscape planning designations;
- The visual containment afforded by the existing green infrastructure framework in combination with the falling topography to the east of the site;
- The presence of mature vegetation including hedgerows, hedgerow trees, and woodland belts will help to minimise the visual envelope of the site and will contribute to the capacity of the site to accommodate development;

- The location of the site in the context of the existing residential edge of Alvechurch to the north and east;
- The opportunity to replenish and enhance the existing landscape framework, including new woodland infrastructure and hedgerow planting, which will help define a new, robust Green Belt boundary and contribute to the capacity of the site to accommodate development and improve landscape quality; and
- The opportunity to incorporate existing watercourses and water bodies into the green infrastructure framework; and
- The opportunity to retain the existing views from the site to the wider landscape at localised high points, for example along the public footpath to the north-west.

Landscape and Green Infrastructure Strategy

3.5 Following the initial stages of this analysis, the development framework for the site has been informed by reference to the constraints and opportunities present on the site. This has ensured that landscape and visual constraints are considered as part of the design process. The influence of these ensures that the location, scale and character of the proposal respond to the local landscape character and that mitigation is an inherent and iterative part of the masterplanning process.

3.6 Mitigation measures are intended to prevent, reduce, remedy or offset adverse effects of a development proposal and an appropriate approach to mitigation should include the formation of a robust landscape and green infrastructure strategy. Therefore, the landscape and visual strategy for the site is outlined below, and is founded on the following principles:

- Identification of a suitable 'development envelope', the location of which pays particular attention to the views both from and to the site, local topography, enhancement of the local network of green infrastructure and also local landscape character;
- Retention and enhancement of the existing vegetation on the site and along site boundaries, wherever possible (subject to constraints such as highways issues); and

- Creation of additional green infrastructure and open space on site, taking into account landscape character and visual containment of the site in order to propose landscape mitigation which is both consistent with and complementary to, the existing local landscape character in terms of scale, disposition and species mix.

3.7 The key elements which should be incorporated into a landscape strategy for the site are summarised as follows.

Development envelope and layout

- 3.8 A development envelope for a site is an area identified within which residential development would sit and it is a constraint on the scale of a proposed development. The development envelope is defined by the site analysis.
- 3.9 The development envelope for the site at Alvechurch should respond to the constraints presented in terms of the vegetation structure of hedgerows, hedgerow trees and tree belts which encapsulate the site to the southern and eastern boundaries and run through the site internally. The development envelope should be set back from these features sufficiently to ensure that they can be retained in the development and enhanced through the landscape strategy; this will require reference to a more detailed arboricultural survey and calculation of appropriate root protection zones.
- 3.10 The development envelope should be set back from the existing tree belts along the stream to the south of the site in order to implement an area of green infrastructure and open space which will provide a robust green edge to the site, forming the proposed Green Belt boundary. The development envelope should also be set back from Redditch Road, specifically at the lowest point of the site, to accommodate attenuation and provide a softened approach. A set back is also suggested along the western boundary with the railway line and station, with appropriate buffer planting to protect the amenity of future residents and provide additional strength to the proposed Green Belt boundary. At the highest point of the site, the view to the wider landscape is retained by leaving most of the northern field enclosure free of development and introducing public open space in this location.

Strategy for existing vegetation

- 3.11 Around the development envelope and layout, consideration should be given to the existing vegetation (including trees, hedgerows, hedgerow trees and tree belts/copses). Where possible these landscape elements should be retained and integrated into the layout of both developable areas and open space.
- 3.12 In some instances, the existing landscape elements, such as hedgerow and trees along the southern boundary can be reinforced and enhanced through additional landscaping and improved management; the aims of which should consider location, function and also biodiversity objectives.
- 3.13 There will inevitably be some limited losses of vegetation across the site as a result of the proposed development, in relation to this site this is most likely to occur as a result of potential site access from Redditch Road. Such losses should be minimised and where they are predicted to occur, they should be balanced by proposals for the retention and implementation of vegetation, including new landscape planting which would be implemented as part of the strategy for green infrastructure and open spaces.
- 3.14 Taking this approach to the existing vegetation structure around the site would ensure that the scale and form of the proposed development responds to landscape elements and features present; this would help to integrate the proposed development into the site and with the context of local landscape character. The retention of existing vegetation would provide an immediate impact in terms of green infrastructure and this would will help to reduce visual impacts and integrate the proposed development into the local landscape.

Green infrastructure and open space

- 3.15 The location and extent of green infrastructure and open space within the site should influence the formation and extent of the development envelope. The central open space allows views towards the wider landscape from the most elevated part of the site to be retained.
- 3.16 The retained areas of vegetation (as described above) would ensure that the built form of a proposal would be contained in a robust and diverse framework of green infrastructure and open space. A strategy for retaining existing vegetation combined with proposals for landscaping would result in a landscape context for future proposals which show a variety of stages of establishment and maturity. This

would enhance the quality of a proposal and also help to integrate the site with the local landscape character.

Landscape scheme and detailed design

- 3.17 The layout of proposals for the site should incorporate substantial areas of private garden space as well as the proposed publically accessible areas of green infrastructure as these would have the capacity to hold a substantial number of street and garden trees which will, over time, contribute to a network of green infrastructure and help to integrate the character of the site with the surrounding landscape.
- 3.18 All landscape mitigation which form part of a proposal should be subject to a high quality detailed landscape scheme so as to ensure that the functions of the landscape components will be delivered; this would also reflect positively on the design quality of a proposal as a whole.

Potential impacts on the Green Belt

- 3.19 Having identified the potential impact of a residentially led development on the site, and established appropriate mitigation in response to this, it is possible to understand the potential impact of this on the Green Belt. In assessing the potential impact on the Green Belt in landscape and visual terms, this analysis makes reference to the five purposes of the Green Belt as defined by the NPPF.
- 3.20 The potential impacts of development on this site, with respect to Green Belt policy will be limited to those at a site level. In the wider landscape context development on the site will not conflict with the purpose and function of the Green Belt. This is due to the settlement edge location of the site; the enclosure of the lower elevations of the site by existing green infrastructure and built form; and the limited likely landscape and visual impact.
- 3.21 In accordance with the NPPF, Green Belt boundaries should be defined clearly, using physical features that are readily recognised and likely to be permanent. It is considered that the southern and western boundaries of the site, in combination with the existing tree belts and stream corridor to the south, could form a clearly defined Green Belt boundary by the nature of them being defined by mature vegetation. The landscape and green infrastructure strategy for the site also proposes new planting throughout the site area and particularly along the southern boundary where there is an interface with the wider countryside. These mitigation

3.22 measures will help to establish and enhance a robust landscaped edge to the proposed development a definitive boundary to the future Green Belt.

3.23 **Table 1** sets out a summary of the likely impacts on Green Belt purpose, in landscape and visual terms.

Table 1: Analysis of potential impact on the Green Belt

Purpose	Analysis
<p>To check the unrestricted sprawl of large built up areas</p>	<p>The town of Redditch to the south is a large urban area. It is considered that the part of the Green Belt that lies to the north of the town is strategically concerned with controlling development that would extend between Redditch and Birmingham, approximately 8km to the north. More locally, it contributes to the separation of Redditch and the villages of Rowney Green and Alvechurch, ca. 1.5 and 2 km to the north respectively; and Bromsgrove c. 6km to the (north) west. In this wider Green Belt context, Redditch remains a large but relatively 'isolated' settlement.</p> <p>Development would extend further into the countryside; however, it would be of an articulated form and character that is consistent with existing urban fringe development. The overall scale of the proposed development would remain generally subservient to that of the existing larger settlement of Redditch and would not constitute unrestricted sprawl of a large built up area – it would comprise landscape and visually led development that responds positively to the constraints and opportunities offered by the site and its context, defined by clear, physical boundaries.</p>
<p>To prevent neighbouring towns merging into one another</p>	<p>Notwithstanding that Birmingham lies c. 8km north of Redditch, between the land at Bordesley and Birmingham are a series of smaller settlements – those closest to the northern edge of the site include the small village of Rowney Green to the north, and to the north-west, the much larger village settlement of Alvechurch.</p> <p>Consequently, the scale of the proposed development will not cause these settlements of varying scale to merge into one another. Physical distances between these scattered settlements will remain substantial, with the character and features within the Green Belt contributing further to the perception of separation, to ensure this particular purpose of the Green Belt will be retained.</p>
<p>To assist in safeguarding the countryside from encroachment</p>	<p>Any proposed form of development must respond positively to the opportunities and constraints offered by any site. In this instance, the location and extent of the proposed development parcels need to be carefully identified on a 'landscape and visually led' basis, taking into account matters of visual amenity, landscape character and the presence or absence of existing development and what these elements offer to the retention of the openness of this part of the Green Belt.</p>

	Several physical features on the site itself, in particular the more elevated ground at Bordesley Park Farm to the east, Dagnell Brook to the west, as well as the existing hedgerow network will work in tandem with the creation of additional green infrastructure to provide opportunities to create enduring and robust boundaries and create green corridors, linking this area of landscape with that to the south and north.
To preserve the setting and special character of historic towns	The site lies outside of any Conservation Area of historic town and is therefore unlikely to have an impact on the setting of features in landscape and visual terms.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	This purpose needs to be considered in the context of the requirements for housing supply and the relative availability of such brown field land.