



## ALVECHURCH PARISH NEIGHBOURHOOD PLAN – SUMMARY OF REGULATION 16 REPRESENTATIONS

REPRESENTATION	SECTION / POLICY / PARAGRAPH	COMMENT (SUMMARISED OR EXTRACT)
APNP01 – Cerda Planning (James Christopher Homes)	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.
	Policy H4	<p>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.</p> <p>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.</p>
	Policy H6	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 Bromsgrove District Council's Plan Review, providing flexibility for developments coming forward on a site by site basis.
	Policy HDNE4	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.
	Policy HDNE5	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. Client's site will assist in increasing access to the open countryside.
	Policy HDNE6	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.
<b>APNP02 – GVA (Taylor Wimpey)</b>	Policy H1	Land within the Green Belt that is to be released for additional housing is expected to be identified following the District Council's Green Belt and Local Plan Reviews. As set out, Taylor Wimpey is concerned that progression of the APNP is advance of the review is therefore premature.
	Policy H4	Taylor Wimpey appreciates the importance of high quality design and would endeavour to meet the principles of the APNP if their site becomes allocated. The importance of the Alvechurch Parish Design Statement is recognised and would be relied upon when formulating the development proposals. The proposals would also adhere to nationally accepted design guidance such as "Secured by Design" and "Building for Life".
	Policy H5	The supporting text notes that sustainable design is covered by national standards and that in Alvechurch Parish there is encouragement for developers to go beyond the national standard and

		<p>build exemplary sustainable homes.</p> <p>Given that the Housing White Paper outlines the Government’s intention to minimise the use of local standards (through the Housing Standards Review), Taylor Wimpey supports the proposition that the Neighbourhood Plan draws upon national standards.</p>
	Policy H6	<p>Taylor Wimpey considers it will be important to maintain flexibility to allow for changing local market circumstances. It will also be important that the housing mix prescriptions are revised in line with up-to-date evidence and it is important that this is reflected within the policy wording.</p>
	Policy H7	<p>Taylor Wimpey affirms, in principle, the support for contributions to community facilities to be sought from new residential development. However, this should be considered on a site by site basis subject to the viability of the proposed scheme. The policy wording therefore should include “subject to viability”.</p>
	Policies for Heritage, Design and Natural Environment (HDNE)	<p>The key features of the site and its surroundings were set out at the beginning of this submission and include proximity to the River Arrow, Alvechurch Conservation Area, Scheduled Ancient Monument and Local Wildlife Site/Special Wildlife Site.</p> <p>The Development Statement prepared for the site, included in Appendix II of these representations, considers a range of technical matters including heritage and ecology. The findings from the technical studies are included in the Development Statement and form the basis of the proposed masterplan for the site.</p>
	Policies for Leisure, Health and Well-being (LHW)	<p>The position of the site within its wider context is a key consideration. The provision of and access to open spaces, recreational and community facilities are explored through the Development Statement for the site.</p>
	Policies for Getting Around and Transport (GAT)	<p>Pedestrian and vehicle access and egress to and from the site have been considered through the Development Statement. The proposed masterplan for the site is based upon technical evidence pertaining to transport and highways, and will seek to avoid the generation of negative impacts in the neighbourhood area.</p> <p>Any reference to developer contributions within the Neighbourhood Plan policies should be worded to allow for consideration of financial viability in order that the delivery of suitable sites is</p>

		not prejudiced. The policy wording should be amended to include “subject to viability”.
	Section 5: Future Growth in the Parish	<p>Taylor Wimpey is cognisant of the relationship between Bromsgrove District’s Local Plan and the emerging Neighbourhood Plan for Alvechurch Parish and is pleased to see that, as far possible, local people residing in the Parish have been, and will continue to be, involved in decisions about where future housing development is directed.</p> <p>Emphasis is placed on the potential offered by the land east of Swan Street, Alvechurch, for residential development and Taylor Wimpey would be pleased to discuss the site with the Parish Council, following the submission of these representations and supporting Development Statement. This suggestion is made with the view that the Parish Council would consider the site as one of the favoured locations for the growth of Alvechurch in the future, in accordance with any reviews of the Neighbourhood Plan.</p>
	Section 6: Monitoring and Review	<p>Taylor Wimpey consider that the APNP needs to recognise the implications of the wider planning policy context and how the timing of the release of the Bromsgrove Local Plan Review and the Birmingham MoU may result in a need for a further review of the Plan.</p> <p>It is therefore recommended that the progression of the APNP be temporarily put on hold, to allow the plan to respond to up-to-date evidence following these reviews. This will ensure that the APNP conforms to policies set out in the revised Bromsgrove Development Plan.</p>
<b>APNP03 – Harris Lamb (Barratt Homes)</b>	Section 1	In the context of the new NPPF (July 2018), strategic policies in the adopted Bromsgrove District Plan already indicate a need to release Green Belt land, therefore there is a compelling case for the APNP to seek to review the Green Belt and release land for development now. This is also necessary in order to deliver Key Aim 1 of the APNP.
	Policy H1	APNP should be reviewed to either support Green Belt release now or it should be acknowledged that an early review of the document is required to expedite the preparation of a replacement neighbourhood plan that identifies development opportunities on land currently in the Green Belt.
	Policy H4	Parts 7 and 8 of the policy include requirements that have significant cost implications for schemes that may not be commercially viable in all cases. These criteria should be worded as

		aspirations rather than requirements to allow for flexibility.
	Policy H6	We are concerned at the prescriptive nature of this policy and that housing mix requirements may change over time. The size of properties proposed should reflect the market demand at the time of a proposal. Part 3 of the policy should be removed in its entirety to ensure flexibility in the delivery of house types.
	Policy H7	Planning obligations cannot be used to address existing deficits in local facility provision. The policy should be amended to reflect that planning obligations will only be sought where they meet the requirements of the CIL122 tests.
	Community Action: Planning Future Education	This community action seeks to address a matter that is not planning related, i.e. school catchments. Policy should be removed from the document.
	Policy LHW4	This policy advises that priority will be given to the provision of improvements to the riverside walk along the River Arrow. Development of the client's site could lead to improvements to the riverside environment and towpath.
<b>APNP04 – Highways England</b>	General	<p>We have reviewed the consultation documents and recognise that the NDP considers the requirements of the adopted Bromsgrove District Plan and that the NDP is not intended to substantially address the long term housing needs that will be considered through the forthcoming Bromsgrove District Local Plan Review. We therefore have no concerns with regard to the implications for the SRN of smaller scale 'infill' development supported by the plan.</p> <p>We support the commitments of the Parish contained within the NDP to sustainable development and the encouragement for improvements to the local transport infrastructure which are important principles in addressing wider transport objectives.</p>
<b>APNP05 – Historic England</b>	General and HDNE Policies.	Historic England is supportive of the content of the document, the vision and aims set out in it and the approaches taken to the historic environment of Alvechurch. The emphasis on the conservation of local distinctiveness as evidenced by historic characterization through the Historic Environment Resource Assessment (AHERA) and on reflecting variations in local character through good design including the protection of locally significant buildings, historic

		farmsteads and townscape character and important green spaces is to be applauded. In conjunction with the Alvechurch Historic Environment Resource Assessment (AHERA) and supporting Historic Environment Action Plans (HEAPS) the excellent Design Statement will no doubt prove invaluable as a detailed context and guide for future development.
<b>APNP06 – National Grid</b>	General	An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.
<b>APNP07 – Pegasus (Gallagher Estates: Bordesley)</b>	Section 1	<p>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.</p> <p>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.</p>
	Vision, Key Aims and General Policy 1	The vision and key aims are supported, particularly Key Aim 1. There appears to be two ‘General Policy 1’ at p.24 and p.25 of the APNP.
	Policy H1	<p>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.</p> <p>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.</p>

		<p>We would therefore suggest the policy is amended so that the principal [sic] of housing development is accepted in all settlements within the Parish with Alvechurch the focus for growth as it is the most sustainable settlement.</p> <p>Criteria (f) and (g) are covered by policies later in the APNP regarding heritage, natural environment and design considerations and should be removed from this policy which is concerned with the location of development.</p> <p>Regarding criteria (i), 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. We therefore believe this policy should be deleted.</p>
	Policy H4	<p>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.</p> <p>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.</p>
	Policy H5	<p>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.</p> <p>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.</p>
	Policy H6	<p>It is not clear what the evidence base is for the mix in Policy H6 (3), 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 a mix of</p>

		housing.
	Policy H7	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.
	Policy HDNE1	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.
	Policy HDNE2	This policy 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.
	Policy HDNE4	<p>Policy HDNE4 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 and open views 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.</p> <p>In relation to the important views listed in Policy HDNE 4, View E. 'From Dagnell End Road up to and across the old Bordesley Park and Bordesley Hall estate and vice versa' 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 undesignated landscape is therefore entirely subjective, and it is considered that</p>



		<p>the Policy HDNE 4 is unduly restrictive in its approach and would in effect sterilise much of the land around Alvechurch Parish, including land around Bordesley, from future development.</p> <p>In the absence of any evidence, it is contended that these landscapes should not be afforded development plan protection through the APNP.</p>
	Policy HDNE5	<p>This policy 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 at Bordesley would afford opportunities to connect to and improve linkages between green spaces, thereby improving public access to the countryside.</p>
	Policy HDNE6	<p>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.</p>
	Policy LHW4	<p>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.</p>
	Policy BSS5	<p>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.</p>
	Policy GAT1	<p>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 though the detailed planning application process, in conjunction with the highway authority.</p>
	Policy GAT3	<p>The NPPF advises that development can only be prevented or refused on highways grounds if</p>

		there would be an unacceptable impact on highway safety, or the residual cumulative impact of development are severe. In this respect criteria 4 of Policy GAT 3 is therefore considered to be an unnecessary inclusion within this policy.
	Section 6: Monitoring and Review	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.
<b>APNP08 – Pegasus (Gallagher Estates: Station Road)</b>	Various (see APNP07)	Identical comments made to APNP07 – with exception of site specific detail re: Policies HDNE4 and HDNE5
	Policy HDNE4	<p>Policy HDNE4 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 and open views 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.</p> <p>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 undesignated 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.</p>

		In the absence of any evidence, it is contended that these landscapes should not be afforded development plan protection through the APNP.
	Policy HDNE5	This policy 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.
<b>APNP09 – Rickett Architects Ltd (Cawdor Capital)</b>	Key Aim 1	The APNP notes at length that there is a need for more local housing – particularly affordable housing (both rent and ownership) for young families and the elderly. Despite this clearly recognised need the APNP makes no provision to meet that need despite this being KEY AIM 1. It simply notes that there is no available land that is not in the Green Belt. In so doing it fails to both meet its own KEY AIM 1 to provide for acknowledged needs and, as will be noted below, it fails to acknowledge the potential that exists to help meet that need via, for example, brownfield land.
	Topic 1: Policies for Housing	The APNP has, at its core, policies relating to the delivery of housing. It bases the subsequent policies upon those policies relating to the delivery of housing as set out in the Adopted Development Plan (the Bromsgrove District Plan). However, the District Council now accepts that it can no longer identify a supply of deliverable housing land sufficient to meet 5 years’ needs. As such the Development Plan policies, on which the APNP housing strategy and policies are based, is now out of date (as confirmed by the council’s Housing Land Supply assessment as at 1st April 2017). As such the APNP is based upon out of date policies in respect of housing delivery.
	Policy H2	It is accepted that the APNP cannot amend Green Belt boundaries; however, that does not absolve the APNP from supporting the appropriate development of brownfield land in accord with the NPPF. Paragraph 117 of the NPPF requires policies to set out a ‘clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land’. Policy 2 of the APNP, relating to housing for Hopwood and Rowney Green is in direct conflict with this requirement in that it only supports the development of brownfield land within the built up area where the site is closely surrounded by existing buildings. This is in complete disregard to the NPPF. The APNP has to be in accord with the NPPF. Nowhere in the NPPF is there a requirement that the development of Brownfield sites can only relate to sites within the built up area of a village and closely surrounded by existing

		<p>buildings. On this basis it is clear that the APNP would not support the development of suitable brownfield land on the edge of the built-up areas. This is far more restrictive than the NPPF which notes, at paragraph 145 that exceptions to the general presumption against development in the Green Belt include 'the partial or complete redevelopment of previously developed land'. The criteria where such development would be acceptable is not where such land is within a settlement and closely surrounded by buildings but, instead, where there would be no greater impact upon the openness of the Green Belt or where it would not cause substantial harm to the openness of the Green Belt.</p> <p>The settlement boundaries used in the APNP are based upon policies that have already been demonstrated to be out of date. They are based upon historic Green Belt boundaries. Whilst it has already been acted that the APNP cannot redraw Green Belt boundaries, the settlement boundaries should reflect current and not historic boundaries. For Hopwood the boundary should be redrawn to include the housing at Woodpecker Close and the commercial open storage area south of Smedley Croke Place. These areas form part of the built up area of the village and, to exclude these from the settlement definition is perverse and factually incorrect.</p>
<b>APNP10 – RPS (Consortium – Wild, Johnson, McIntyre, Fisher)</b>	Section 2	<p>Paragraph 2.7 states that the APNP will need to be reviewed once the Green Belt Review has been undertaken. RPS agrees with this statement, and welcomes a APNP review once the Local Plan has been adopted. This is supported by paragraph 2.13, where the Parish Council admits that Alvechurch Village no longer has areas for residential development and will look towards the edge of the village to release green belt land in the most sustainable locations.</p>
	Policy H1	<p>This policy sets out the criteria to support applications for residential development, RPS agree with the majority of the criteria, criteria (a) states that new housing development will be supported in principle if <i>'it is located within the designated Alvechurch Village settlement boundary'</i>. Paragraph 2.13 states that <i>'if Alvechurch village is to have more sustainable and affordable housing after 2023... then land around the edge of the Alvechurch Village will need to be released'</i>. This clearly points to the need to review the APNP and the settlement boundaries to accommodate additional housing.</p>
	Policy H7	<p>Policy H7 looks at the improvement of services and facilities including the conservation of wildlife and creation and maintenance of canal-side and countryside footpaths. RPS would like to refer to the Delivery Document for the proposed site, which runs alongside the Worcester and</p>

		Birmingham Canal. The proposal intends to enhance the area and encourage the integration of the village to encourage current residents to enjoy the area.
	Policies LHW1, LHW3 and LHW4	Policies LHW 1: Healthy Environments and Health Care Facilities, LHW 3: Improvement to and Protection of Open Spaces, and LHW4: Sport, Leisure and Recreational Facilities refer to the financial contributions from sites of 10 dwellings or more. RPS request each of these policies should include a consideration into financial viability on a site by site basis so the delivery of housing within Alvechurch parish is not put at risk due to funding.
	Policy GAT1	Suggest including reference to considering the financial viability of schemes under criteria 3f where the plan refers to the provision of electric vehicle charging infrastructure, as this may affect the viability of a development.
	Section 6: Monitoring and Review	RPS agree that the NP should be reviewed every five years, however once the Bromsgrove District Local Plan has been adopted the Parish Council should look to review the NP prior to 2022/23 to address any policies that may conflict between the two documents and address any areas that may potentially be released from the Green Belt within Alvechurch. The NP Steering Group may want to reconsider changing the wording to 'the first review is likely to take place once the Bromsgrove District Local Plan has been reviewed and adopted'.
<b>APNP11 – WCC Children, Families &amp; Communities Team</b>	General	<p>Worcestershire County Council's Children, Families and Communities Department note that the Parish Council place significant importance on undue pressure and the need for school places in the area.</p> <p>As a commissioner of school places, Children, Families and Communities will continue to work with schools serving the local area to protect and enhance school assets and playing fields, in line with Government policies on the delivery of statutory education provision. Where planned housing development has been identified, we will continue to monitor housing growth in and around the local area and respond appropriately to ensure a sufficiency of school places. Where necessary, developer contributions will be sought to mitigate the impact of housing development and demographic growth within the area.</p>
<b>APNP12 – Canal &amp; River Trust</b>	General	The Trust is very pleased to note that so many of our comments on the pre-submission version have been taken into account and that the new document provides greater protection and

		<p>support for improvements to the canal and its towpath in the future.</p> <p>In particular we note the additional support given in Policy H7, HDNE6, LHW3 and GAT1, all of which we are now able to fully support. In particular we are pleased to note the addition of a new paragraph 4.343, which states 'New development will create additional use of the existing parish Green Infrastructure (GI) possibly resulting in its degradation. New development should therefore be required to fund improvements to the GI asset to ensure it remains fit for purpose for both existing and new users as recognised and supported by the NPPF'.</p>
<b>APNP13 – A.J Parker</b>	General	I wish to register my support for the Alvechurch Neighbourhood Plan, and ask that it be included in the Bromsgrove District Plan.
<b>APNP14 – Hartnells (Bishop Properties Ltd, Paul Wild, Charter Interiors Ltd)</b>	Section 2	<p>Paragraph 2.7 says that the Alvechurch Parish Neighbourhood Plan will need to be reviewed once the Green Belt Review has been undertaken which is agreed and the review will be welcomed by my clients once the Local Plan has been adopted. In Paragraph 2.13, the Parish Council acknowledges that Alvechurch Village no longer has areas for residential development and will look towards the edge of the village to release green belt land in the most sustainable locations.</p> <p>My clients will be pleased to demonstrate the deliverability of the land to the south-west of Callow Hill Road as a fitting a sustainable residential development with the Redditch to Birmingham railway line providing a defined western boundary line.</p>
	Policy H1	The above is fully supported by my clients as confirming the need to review the APNP and the settlement boundaries to accommodate additional housing.
	Policy H7	This looks at the improvement of services and facilities including the conservation of wildlife and creation and maintenance of canal-side and countryside footpaths. My clients will be pleased to demonstrate their proposal to meet these wishes.
	Policy LHW3	LHW 3 promotes the improvement and protection of open spaces, and lists the Worcester and Birmingham Canal and towpath as open space valued by the community. My clients will work with both the Parish Council and the Canal and River Trust to ensure the residential development maximises the treatment of the canal frontage for the benefit of the village and the development.
	Para.4.383	Paragraph 4.383 encourages the use of traffic calming measures to improve safety in Alvechurch Parish. This is supported fully by my clients who consider it an essential consideration in its

		planned residential layout and access arrangements so as to ensure a safe and sustainable scheme capable of catering both for current and future traffic requirements.
	Section 5 and Section 6	My clients agree that once the Local Plan has been reviewed that the Neighbourhood Plan should then also be reviewed to look at the amendment of existing settlement boundary so as to accommodate additional housing.
<b>APNP15 – Natural England</b>	General	<p>Natural England has previously commented on this plan and made comments to the authority in our letter dated 5th November 2017 and the advice provided in our previous response applies equally to this plan.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended plan, please assess whether the changes proposed will materially affect any of the advice we have previously offered.</p>
<b>APNP16 – North Worcestershire Water Management</b>	General	<p>It is now a requirement of the Bromsgrove local plan that major developments provide sustainable drainage and attenuate surface water runoff up to 0.1 Annual Exceedance Probability rainfall event. We would recommend cross referencing policy 23 in this document. We also strongly encourage sustainable drainage for all new development and we welcome the references to flood risk and sustainable drainage made in the plan.</p> <p>We would suggest that a reference is made to the CIRIA SuDS Manual, for guidance to developers for SuDS.</p> <p>There does not appear to be any reference to the sequential test for flood risk required in the NPPF when considering new development sites. It is suggested that it is referenced. We would also recommend reference to the Environment Agencies surface water flood risk mapping, this is freely available online to access and indicates the level of risk to all sites with respect to surface water flood risk.</p> <p>We would also encourage that reference is made to the promotion of Natural Flood Risk management measures, this relates to process such as planting trees, interrupting drainage paths, creation of space for water etc for the purposes of reducing runoff rates and restoring natural hydrology. Such measures can be important parts of enhancing the local environment and</p>

		provide a wide range of other benefits in addition to flood risk improvements such as biodiversity enhancement and carbon storage.
<b>APNP17 – Lone Star Land Ltd (Corbally Group)</b>	Policy H4 (7) II	This policy requires that development proposals reflect the prevailing size, layout and access of existing nearby properties and development pattern that is in keeping with the Alvechurch rural locality. This policy is supported but it will not be possible to implement it due to the over rigid mix policy H6 which requires that 50% of new housing developments are 1 and 2 bed flats and dwellings.
	Policy H4 (8)k	Whilst the aim of the policy in trying to ensure vehicles do not dominate the street scene is supported, it is not necessary to preclude parking at the front of buildings to achieve this aim. The attractive historic core of Alvechurch is not typified by parking between buildings. The built form [sic] of the historic core tends to be in a continuous frontage close to the highway with on-street parking. This policy anticipates that new development will be of a suburban style that typifies the majority of the built form [sic] in the village which is post-war; however, this will not be the case as the rigid mix policy H6 requires that 50% of new dwellings are to be 1 and 2 bed flats and houses.
	Policy H6 (3)	<p>The requirement to provide a housing mix and 40% affordable housing on sites of 11 dwellings or more is supported. However, Policy H6 (3) is not supported and will not meet the basic conditions test. This policy does not accord with national policy, it does not accord with Policy BDP7 of the Bromsgrove Development Plan (BDP) and it does not reflect the analysis set out in the Worcestershire SHMA 2012. In addition, there is emerging evidence which demonstrates that:</p> <ul style="list-style-type: none"> <li>• people do not necessarily occupy a house that ‘fits’ their household size;</li> <li>• that the majority of elderly people do not wish to wish to downsize; and</li> <li>• that home working is increasing.</li> </ul> <p>This evidence suggests that such a prescriptive house size policy would not meet the needs of the future population, in contrast to the stated aim of the policy and would therefore fail to meet the strategic aims of the BDP.</p>
	Policy BSS3 (c)	This policy seeks to support the more effective use of existing business sites, particularly Bordesley Hall. It is noted that the policy is subject to Bromsgrove Local Plan policy BDP14. In that regard the policy is supported.
	Policy BSS7	Policy BSS7 seeks to support Bordesley Hall as a business centre and make efforts to maintain employment opportunities for local people. We are grateful that the evidence from Harris Lamb



		<p>has been incorporated into the submission version of the NDP and that the NDP acknowledges that remodelling, extension and new build may be needed.</p> <p>However, the introduction at paragraph 4.319 is much more restrictive than Bromsgrove Local Plan policy BDP4 on the Green Belt. Paragraph 4.319 restricts any redevelopment or extensions to the footprint of the hall and its outbuildings. Paragraph 4.326 of the reasoned justification uses strong language and sets the same restriction.</p> <p>The Local Plan policy (BDP4.4) reflects national Green Belt policy in the 2012 NPPF (and, for that matter, the 2018 version). As a result the restriction of redevelopment and extension to the existing hall and outbuildings does not meet the basic conditions tests. It should be reworded to reflect the Local Plan.</p> <p>Paragraph 4.319 of the NDP also states that new build should have ‘minimal impact’ on nearby residents. It is not clear why this requirement is in quotation marks. In any event, this is not the test in the actual policy or that explained in the reasoned justification at paragraph 4.325. The text in paragraph 4.319 should not set a higher bar than the actual policy it is seeking to introduce and should align with paragraph 4.325. NDP policy BSS7 should state that any development at the site that would result in the loss of employment land at the site for non-employment use would need to comply with local plan policy BDP14.4.</p> <p>Whilst this is not a matter that cuts to the issue of whether the plan meets the basic conditions, the language used in paragraph 4.326 is very disappointing. The phrase ‘self-styled’ is a pejorative trope and has no place in a development plan.</p>
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