

About this Consultation

The joint Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan 2018-30 was submitted to Bromsgrove District Council on 12th December 2018. The District Council is satisfied the Neighbourhood Plan is in accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and is therefore publicising the plan proposal and inviting representations as part of its obligation under Regulation 16 of the above regulations.

In order to give the Council a clear and accurate picture of your views, it is preferred that you make your representation on this specific representation form (although other responses will be accepted). It is important to specify which part of the neighbourhood plan (by page and/or paragraph and/or policy number) you are commenting on.

The representation period is open for 6 weeks from:

Thursday 14th February 2019 to Friday 29th March 2019

Where to view the Documents

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

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

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

How to Respond

You can make representations by responding using the following methods:

 Email	strategicplanning@bromsgroveandredditch.gov.uk
 Post	Strategic Planning – Bromsgrove District Council Parkside Market Street Bromsgrove Worcestershire B61 8DA

Data Protection

The information collected will be processed in accordance with the Data Protection Act 2018. Information from the forms will be stored on a computer database used solely in connection with the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan. All representations received by the District Council will be sent to the person appointed to undertake an independent examination into the Lickey & Blackwell and Cofton Hackett Neighbourhood Development Plan, specifically whether the plan is deemed to meet the ‘basic conditions’ set out in Schedule 4B para.8(2) of the 1990 Town and Country Planning Act.

Any representation may also include a request to the District Council to be notified of the local authority’s decision on whether the neighbourhood plan is to be ‘made’ in accordance with Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended). **Please make this request using the question/answer box at the end of this representation form.**

Your contact details

Name	Jessica Graham
Organisation (if applicable)	Savills (UK) Limited
Representing (e.g. self or client)	Cala Homes (Midlands) Limited
Email Address	JGraham@savills.com
Postal Address	Savills, 55 Colmore Row, Birmingham, B3 2AA
Telephone Number	0121 634 8494

Privacy Statement

Who is collecting this information

This information is being collected by Bromsgrove District Council.

Why we collect and use this information

We are collecting this information for the purpose of carrying out a statutory representation period on a plan which may become part of the Council's statutory development plan. We are processing this information under the same legal basis.

Storing this information

We will keep your personal data until the plan has been 'made' or until such time as you request to be taken off the database prior to this. It will be used only for the purpose stated and will not be shared or sold.

Data collection requirements

We may need to share the information that you give to us with an independent examiner as part of a legal obligation in the neighbourhood plan making process, but the information will not be used in any profiling/automated decision making.

Further information

If you would like further information about this privacy notice, please contact the Strategic Planning Team at strategicplanning@bromsgroveandredditch.gov.uk

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

Section 1: Introduction and Background

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

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

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

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

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

Section 4: Vision and Objectives

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

We submitted representations on behalf of our client, Cala Homes, to the Draft Neighbourhood Plan in July 2018. Within our submission to these representations, we commented on Objective 2 which states "*where possible we will retain open land between individual settlements and use this plan to help engage in the wider strategic Green Belt Review of Bromsgrove District Council*". In our previous representations, we acknowledged the addition of the phrase 'where possible' from the First Draft Preferred Options version of the Neighbourhood Plan (summer 2017) but considered that this objective is premature and should not be included in the Neighbourhood Plan until the findings of the Bromsgrove Green Belt Review have been finalised and published. The wording of Objective 2 in the Submission Version of the Plan has remained the same as the Draft Neighbourhood Plan so our suggested amendments to Objective 2 have not been made. We consider that as the findings of the Bromsgrove Green Belt Review are still unknown, Objective 2 still pre-empts the findings of the Green Belt Review. We suggest that Objective 2 in the Submission Version of the Neighbourhood Plan should be reworded to reflect this.

We also submitted comments regarding Objective 4 to the Draft Neighbourhood Plan in July 2018. We sought justification on the wording of the objective which states "*will support residential development of modest size that are in scale with the character of the surrounding area*". As the wording of this objective has remained the same in the Submission Version of the Neighbourhood Plan, we again, seek justification on what the Neighbourhood Plan considers constitutes 'modest' development. We consider that although this objective may be suitable for infill developments, the wording of the objective may not be suitable if sites are allocated in this area within the Bromsgrove District Plan Review following the Green Belt Review. We seek further justification on the wording of Objective 4.

Section 5: Key Issues and NDP Planning Policies?

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

Within our submission to the Draft Neighbourhood Plan Consultation in July 2018, we considered that the statement "*The neighbourhood area's location within the Green Belt means that extensive new housing developments would be inappropriate*" in paragraph 5.3, pre-empted the findings of the upcoming Bromsgrove Green Belt Review. We note that the wording of this paragraph has remained unchanged in the Submission Version of the Neighbourhood Plan.

In our previous submission to the Draft Plan, we made reference to the housing crisis in the Birmingham Housing Market Area ('HMA') and stated that Green Belt release will form a key component for solving the housing shortfall. In accordance with Policy BDP4 in the adopted Bromsgrove District Plan, in order to deliver the District's 7,000 dwelling requirement, 2,300 dwellings will be required to be delivered on former Green Belt sites up to 2030. In addition to the District's needs the Local Plan and Green Belt Reviews are also expected to address the Greater Birmingham HMA shortfall of 37,900. In addition, we also made reference to the introduction of the standardised methodology resulted in Bromsgrove's OAN increasing from 349 dwellings per annum to 364 dwellings per annum. Therefore, we expect that the District's housing requirement may increase in the Local Plan Review and more than the estimated 320 hectares of land (Policy BD4 of the Bromsgrove District Plan) will be required to meet the District and HMA's need.

Since our representations to the Draft Plan, the Government has published a revised National Planning Policy Framework ('NPPF') and introduced the Housing Delivery Test on 19th February 2019. The Housing Delivery Test calculates the housing need for local authorities by calculating the number of homes required over the three year period and adjusted net additions over the same period. The Government considers 95% delivery of assessed need as the pass rate. Bromsgrove's published delivery score is 94% and therefore, Bromsgrove District Council are required to produce an 'Action Plan'. All local planning authorities with a result of less than 95% have six months to prepare an Action Plan. The role of an Action Plan as set out in Planning Practice Guidance ('PPG') is to "*identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery*".

In light of the above, we consider that the sentence "*The neighbourhood area's location within the Green Belt means that extensive new housing developments would be inappropriate*" should be removed until the findings of the Green Belt Review have been

published and more is known on the housing requirement for Bromsgrove. It is evident through adopted Policy BDP3 of the Bromsgrove District Plan (2017) that Green Belt land will be required to support Bromsgrove's housing need. Therefore the Neighbourhood Plan should recognise this.

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

Topic 1 – Policies for Natural Environment

Paragraph 6.1

We note that the wording of "*Lickey & Blackwell and Cofton Hackett are largely located within the Green Belt and only very limited development is appropriate*" has remained unchanged from the Draft Plan to the Submission Plan. In our submission to the Draft Neighbourhood Plan (July 2018) we objected to the inclusion of this statement. We consider that this statement pre-empts the findings of the Green Belt Review which may recommend the release of Green Belt land in this area for development due to its close proximity to the Birmingham conurbation. We also consider that Green Belt is a planning tool that is used to prevent urban sprawl, as per paragraph 133 of the NPPF; it is not a policy that relates to land being of high landscape or biodiversity value. Therefore, we consider that by the Neighbourhood Plan referring to the Green Belt in the Natural Environment Chapter, the Neighbourhood Plan has used the Green Belt policy as an environmental tool. We consider that the Green Belt should be not referred to in the Natural Environment Chapter where policies should more appropriately relate to local landscape character, biodiversity, green infrastructure and geodiversity.

Paragraphs 6.15 and 6.16

As mentioned above, as Green Belt is not an environmental tool, we consider that it should not be mentioned within the Natural Environment Chapter. We also consider that the conclusions on Green Belt land along Old Birmingham Road and the role it performs, pre-empts the findings of the Green Belt Review and there is currently no up-to-date evidence to support the comments in paragraphs 6.15 and 6.16. Therefore both paragraphs should be removed.

Policy NE1 Local Landscape

We note that this policy has been amended to Policy NE1 in the Submission version Neighbourhood Plan from Policy NE2 in the Draft Plan (July 2018). In our submission to the Draft Plan (July 2018), we suggested that the statement in the second paragraph “*landscaping schemes should be designed to protect and enhance the distinctive elements which contribute to the local landscape character in Lickey & Blackwell and Cofton Hackett*” should be reworded in order to accord with the revised NPPF. Paragraph 127 of the NPPF February 2019 states: “*Planning policies and decisions should ensure that developments...are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*”. We consider that the statement in paragraph 2 of Policy NE1 should be reworded in order to not discourage appropriate change and development and be in accordance with the NPPF.

In our previous response, we sought clarification on point 1 of Policy NE2 (now Policy NE1) which states ‘*any felled trees replaced with native species which grows to an appropriate scale*’. As this statement has not been amended from the Draft to Submission version, we continue to seek clarification on what an ‘appropriate scale’ is in relation to the replacement trees.

We note that Point 4 in Policy NE1 has remained unchanged from the Draft to Submission version. We consider that the statement “*where possible, remaining areas of permanent pasture around the edges of existing settlements should be protected from development*” should be removed. We consider that land on the edge of settlements, such as Cala Homes’ site off Old Birmingham Road, is the most suitable for development due to its proximity to the services and facilities that the adjacent settlements, such as Catshill and Lickey, may provide. We consider that Point 4 in Policy NE1 pre-empts the findings of the Green Belt Review and is contrary to national and local planning policy therefore it should be removed.

Policy NE2 Protecting and Enhancing Biodiversity

We note that this policy has changed from Policy NE3 in the Draft Neighbourhood Plan (July 2018) to Policy NE2 in the Submission Plan. In our response to the Draft Plan (July 2018), we suggested that the wording of Paragraph 3, “*where a culverted watercourse falls within the footprint of a development, the water course should be restored to a natural channel*” should be altered to include ‘where possible’ so that future land options in the Neighbourhood Plan area are not adversely impacted by this requirement. However, we note that the wording of this paragraph has not changed from the Draft to the Submission version of the Neighbourhood Plan. We consider that this proposed policy could have significant impacts on development sites in terms of density and layout, which could affect the ability of a development to efficiently use the land as required by Paragraph 117 of the NPPF (February 2019). We consider therefore that a blanket approach should not be taken to removing culverted sections of water course. We consider that this sentence should be reworded to include ‘where possible’ to ensure that future development is not

adversely affected.

Paragraph 6.36

We support the inclusion of the NPPF definition of Green Infrastructure in the Submission version of the Neighbourhood Plan.

Policy NE3 Green Infrastructure

We note that this policy has changed from Policy NE4 in the Draft Plan (July 2018) to Policy NE3 in the Submission Plan. In our previous response to the Draft Plan (July 2018), we did not object to this policy, but considered that this policy on Green Infrastructure is essentially a repeat of Policy BD24 of the Bromsgrove District Plan. Therefore, we still consider that this policy should be deleted.

Topic 2 – Policies for Built Heritage and Design

Policy BD2 Encouraging High Quality Design

Within our submission to the Draft Neighbourhood Plan in July 2018, we objected to Point 2 of Policy BD2 as we considered it sought to decrease residential densities and was contrary to the NPPF. As this Policy has not altered from the Draft (July 2018) to Submission version of the Neighbourhood Plan, our objection remains. Point 2 of Policy BD2 states that “*subdivision of plots and infill development will only be supported where additional buildings would not lead to significant and unacceptable increases in plot density*”.

We consider that this statement is contrary to Policy BDP7.2 in Bromsgrove District Plan and the NPPF (February 2019). Paragraph 122 of the NPPF (February 2019) states that “*planning policies and decisions should support development that makes efficient use of land*” and paragraph 123 states that “*planning policies and decisions [should] avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site*”.

Therefore, we consider that if developments do not optimise the use of land and are not built out at appropriate densities, it may result in the requirement for more land in the District to be released from Green Belt in order to meet both the District’s housing need and the Greater Birmingham HMA’s. We consider that reference to low densities in Policy BD2 should be removed in order to accord with local and national planning policy.

Topic 3 – Policies for Housing

Overall Chapter 8 Comments

As stated in our response to Section 5, at present, there is a Greater Birmingham HMA shortfall of 37,900 dwellings which will be distributed across the HMA authorities and a standardised methodology was introduced in the NPPF (July 2018) to calculate Objectively Assessed Need ('OAN'). This resulted in Bromsgrove's OAN increasing from 349 dwellings per annum to 364 dwellings per annum. Although the HMA shortfall has yet to be distributed between the HMA authorities with a Statement of Common Ground, it is considered that once the housing figures are confirmed, this may increase Bromsgrove's housing requirement. Therefore, we consider that the Neighbourhood Plan should make reference to both the Greater Birmingham HMA shortfall and Standardised Methodology as they may have a significant impact on the housing requirement which will be set out in Bromsgrove's Local Plan Review. Additionally, with the adoption of the District Plan (2017), it confirmed that Bromsgrove does not have enough non-Green Belt land to meet the current housing requirement which resulted in the inclusion of Policy BDP3 which states that a Green Belt review should be undertaken and Green Belt land would be released for housing in order for the District to meet their housing requirement in the District Plan. The 7,000 dwelling requirement within the District Plan does not include a contribution towards the HMA shortfall. Therefore it is considered that further Green Belt land than that required under Policy BDP3 will need to be released in order to accommodate a greater housing requirement to meet the wider HMA needs as well as local needs.

Additionally, the Ministry of Housing, Communities and Local Government ('MHCLG') published the Housing Delivery Test on 19th February 2019. The housing delivery test calculates the 'housing need' for local authorities by calculating the number of homes required over the three year period and adjusted net additions over the same period. We consider that the figures are used to incentivise local authorities to drive up housing delivery with a 'presumption in favour of sustainable development'. The government deems 95% delivery of assessed need as the pass rate. Councils that deliver between 85% and 95% of assessed need must develop an action plan, whilst those that deliver between 25% and 85% must identify 20% more land for development than originally required in the five-year supply included in Local Plans. Bromsgrove's published delivery score is 94% and therefore, Bromsgrove District Council are required to produce an 'Action Plan'. All local planning authorities with a result of less than 95% have six months to prepare an Action Plan. The role of an Action Plan as set out in Planning Practice Guidance ('PPG') is to "*identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery*".

In light of the above, we expect that the District's housing requirement will increase and more land will be required to be allocated for residential use which will involve amending Green Belt Boundaries. Under paragraph 136 of the NPPF (February 2019), changes to Green Belt boundaries should be established in strategic policies and Neighbourhood Plans have the power to make detailed amendments to those boundaries. We consider that the Neighbourhood Plan Steering Group should choose their preferred sites at the Neighbourhood Plan stage, instead of waiting for the District Council to select the sites for them. Paragraph 8.5 in the Submission Plan states that the settlement hierarchy within Policy BDP2 of the District Plan identifies Barnt Green (including Lickey) as a large settlement. Policy BDP2 also states that "proposals for development for any needs arising outside the District will be fully justified and based on principles of sustainable development and evidence indicating the most appropriate location for such development across the West Midlands area". It is considered that the Neighbourhood Plan Area is a suitable location for residential growth to meet the District and HMA's housing needs. Paragraph 9.2 of the Neighbourhood Plan acknowledges that the area has good accessibility which we support and consider that an appropriate level future residential growth should be directed in this area. Sites which are adjacent to the existing settlements within the Neighbourhood Plan Area and are in close proximity to existing public transport options, such as Cala Homes' site, should be consider for release from the Green Belt and allocated for residential development.

Paragraph 8.1

Within our submission to the Draft Plan (July 2018) we acknowledged that the Neighbourhood Plan stated that reviewing the Green Belt was a Strategic Matter and therefore, "*NDP planning policies for new housing will focus on guiding relatively small-scale development within the existing village envelopes and their boundaries*". We agreed that the Green Belt Review was a strategic matter however, we considered that the Neighbourhood Plan should identify land on the edge of settlements that are sustainable housing sites. As the wording of this paragraph has remained unchanged from the Draft to the Submission version, we continue to object to this point. As acknowledged within Policy BDP3 of the Bromsgrove District Plan, there are limited brownfield opportunities within existing settlements therefore Green Belt release will be required across the District to meet the 7,000 dwelling requirement. We therefore consider that the although paragraph 8.1 of the Neighbourhood Plan seeks to focus development within the existing settlement boundaries, the Plan should identify land on the edge of settlements as there are limited development site opportunities within the existing settlements. Land on the edge of the existing settlement, such as Cala Homes' site on Old Birmingham Road, offers a sustainable residential development opportunity on the edge of the Lickey / Barnt Green settlement boundary that could be considered for inclusion within the Neighbourhood Plan.

We consider that local communities should play a proactive role in identifying where new development could be delivered in their areas. By selecting their preferred sites, the Neighbourhood Plan Steering Group may be in a more advantageous position to have more say in where residential development occurs; rather than Bromsgrove District Council selecting sites for them through the

District Plan Review process.

Paragraph 8.3

In our response to the Draft Plan (July 2018), we suggested that this paragraph should be reworded. We objected to the Neighbourhood Plan referring the District's 7,000 dwelling requirement as a "target". As the wording of paragraph 8.3 in the Submission version has remained the same as the Draft version, our suggested amendments have not been made. We consider that the District's 7,000 dwelling requirement is not a 'target' but should be seen as a minimum requirement. As the MHCLG is committed to boosting the supply of housing, we suggest that this paragraph should be amended to remove 'target' and include 'a minimum of 7,000 dwellings'.

Policy H1 New Housing within Existing Settlements

As stated in our response to the Draft Plan (July 2018), we do not object with the wording or inclusion of this policy. However, we consider that this policy will need to be reviewed if the Green Belt review identifies any Green Belt land within the Neighbourhood Plan area that could be released for residential development.

Policy H2 Housing Mix

In our response to the Draft Plan (July 2018) we objected to the second part of the policy which requested that schemes will be supported where they provide smaller homes and meet older people's needs. We considered that this part of the policy was not in accordance with local and national planning policy. Policy H2 within the Submission Version of the NP has been reworded to include 'where possible' at the start of the policy. We support this additional text as it provides slightly more flexibility for developers.

Policy H3 Energy Efficiency

Policy H3 is a new policy within the Submission version of the Neighbourhood Plan. We consider that more flexibility is required in order to make this policy sound and deliverable. Therefore we proposed that this policy is slightly reworded to the following "*Where viable, new housing should include suitable energy efficiency measures...*".

Topic 4 – Policies for Infrastructure

Within our response to the Draft Plan (July 2018), we commented that the second paragraph of Policy INF1 should be reworded to include 'where possible'. We therefore support the inclusion of 'where possible' in the second paragraph in the Submission version of the Neighbourhood Plan: '*where possible, developers should provide measures which link to safe and accessible walking*

and cycling routes". We consider this addition appropriate as developments cannot do appropriate works to link to cycle/footpaths, if the area is outside of their land ownership.

To ensure that walking, cycling and public transport can be encouraged in accordance with proposed neighbourhood plan policy INF2, future development should be located adjacent to existing settlements and public transport routes. Cala Homes' site is adjacent to the settlement of Lickey and is within walking distance of bus stops, with services to Bromsgrove and Halesowen, as well as Lickey Hills Primary School and Tesco Express in Marlbrook. The pedestrian routes from the site into Lickey and Marlbrook are lit and there are tarmacked footpaths on either side of Old Birmingham Road to ensure safe and convenient pedestrian access to the services provided in both settlements.

We note the addition of two policies in Chapter 9: Policy INF2 Providing Safe and Accessible Environments for All and Policy INF3 Communication Technologies.

In relation to Policy INF2, we consider that 'where appropriate' should be included before the first paragraph so that it reads "*where appropriate, new developments should be designed to incorporate a strong focus on age and dementia friendly environments*". Again, this should ensure that there is more flexibility for future developers on sites where it may not be viable to deliver such design.

Topic 5 – Policies for community facilities

Topic 6- Policies for Commercial and Business Interest

Section 6: Next Steps

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

Other Comments

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

In regards to the below question on whether we wish to be notified of the local authority's decision on whether this Neighbourhood Plan is made, we would like to be notified and also wish to be informed when the plan is submitted for examination, any hearing sessions, when the Examiner's report is published and when the plan will be taken to referendum.

Would you like to be notified of the local authority's decision on whether this neighbourhood plan is made, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012?

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

Yes

No

Location Plan

Land off Old Birmingham Road, Marlbrook

