

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	Mr Simon Hawley
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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?

Policy Framework

We note that the Neighbourhood Plan has been prepared to be in conformity with the requirements of the adopted Bromsgrove District Local Plan. The National Planning Policy Framework ("The Framework") and the accompanying National Planning Practice Guidance ("NPPG") require this to be the case. As such, we have no particular concern in this regard. It should, however, be noted that the adopted Bromsgrove Local Plan acknowledges that the Local Plan itself is incapable of meeting the District's housing growth requirements. The housing requirement set by the adopted Local Plan is 7,000 dwellings. It is not, however, possible to accommodate 7,000 dwellings in the District without Green Belt land release. Policy BDP3 – Future Housing and Employment Growth, explains that a plan review will be undertaken to deliver 2,300 dwellings on Green Belt land between 2023 and 2030. In addition, the emerging plan will need to play a key role in meeting a proportion of Birmingham City's unmet housing need. The District Council are currently preparing a Local Plan within this context.

The emerging replacement plan will need to depart significantly from the approach of the adopted Local Plan. The housing requirement will, in all likelihood be significantly greater given the need to meet both Bromsgrove District's housing requirement and a proportion of Birmingham's housing need. Green Belt release is inevitable, and the local authority will need to identify the most appropriate sites for Green Belt land release. This could well include sites adjacent to the urban edge of Birmingham within the Neighbourhood Plan area.

That being the case, the approach of a large number of policies in the emerging Neighbourhood Plan will be rendered out-of-date by the adoption of a replacement Bromsgrove Local Plan relatively soon. The introductory section to the plan should confirm this wider policy context and that a full review of the Neighbourhood Plan will need to be undertaken in the context of the replacement Bromsgrove Local Plan following its publication. The current Neighbourhood Plan should not be used as a mechanism to fraught or restrict the delivery of housing in the emerging replacement Local Plan to meet the identified housing need.

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?'

We generally support the description of the various areas included within Section 2 of the Neighbourhood Plan. Understandably, the description concentrates on the principal settlements and the surrounding areas. It should, however, be noted that the northern boundary of the Cofton Hackett Parish area adjoins the built-up edge of Birmingham. This area is notably different than the various villages within the Neighbourhood Plan area in character as it is urban fringe land dominated by dense development.

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?'

As referred to in our response to Section 1, we have no particular concerns about the Neighbourhood Plan being in conformity with existing Bromsgrove District Plan 2011 – 2030. However, this does limit the length of the Neighbourhood Plan period given that the emerging replacement Bromsgrove Local Plan will significantly change the way that development is delivered within the Bromsgrove area. As a consequence, the wording in Section 3 should be revised to acknowledge that the Bromsgrove Local Plan is subject to review, and this will affect the weight and relevance that can be attached to the Neighbourhood Plan once the replacement Local Plan is adopted.

Section 4: Vision and Objectives

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

Objectives

We support the majority of the Neighbourhood Plan objectives; however, the requirements of Objective 1 needs to be revised. Objective 1 advises that, amongst other things, that Green Belt be protected. However, as it was referred to above Green Belt land release is inevitable through the emerging replacement Bromsgrove Local Plan. Objective 1 should, therefore, be revised to advise that the existing Green Belt will be protected in accordance with national and local level planning policies until such a point that land is released from the Green Belt through the Local Plan review.

Similarly, Objective 4, that advises that the Neighbourhood Plan supports residential development of a "modest size". Objective 4 should acknowledge that an alternative approach may be required and large scale housing may need to be delivered in the adjacent built up edge of Birmingham through the Local Plan review.

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?'

We have particular objection to the various topic areas identified for the wider policies contained within the Neighbourhood Plan. It is, however, our view that the supporting text should be amended. At paragraph 5.2 it is correctly advised that Neighbourhood Plans become part of the Development Plan once made. Applications for planning permission should be determined in accordance with the Development Plan, including the Neighbourhood Plan, unless material considerations indicate otherwise.

Reference should, however, also be made to the provisions of paragraph 30 of the Framework. Paragraph 30 advises that once a Neighbourhood Plan has been brought into force its policies can take precedence over existing non-strategic policies in the Local Plan covering the neighbourhood area where they're in conflict. However, this is not the case where they are preceded by strategic

or non-strategic policies that are subsequently adopted. If there is a conflict in the policies in the Neighbourhood Plan and the subsequent Bromsgrove Local Plan, the policies from the Bromsgrove Local Plan effectively supersede the Neighbourhood Plan policies.

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

It is advised at paragraph 6.16 that the Neighbourhood Plan provides robust evidence for the forthcoming Green Belt review to support the preparation of the Bromsgrove District Plan. This is not the case. The Neighbourhood Development Plan does not include any form of assessment against the role of the purposes of the Green Belt identified by the Framework. Whilst the Neighbourhood Plan does include a commentary on the landscape within the Green Belt, this is not an analysis of the role and purposes of the Framework identified by paragraphs 133 and 134 of the Framework.

Significantly, it is inevitable that Green Belt land release will be required in Bromsgrove in the future as detailed in the adopted Bromsgrove District Development Plan. The local authority will need to identify the most appropriate sites for Green Belt release. A comparative exercise will need to be undertaken between various sites in order to establish the Green Belt land that is most suitable for development. As the Neighbourhood Plan is only able to focus on land within the Neighbourhood Plan boundary, it is not possible for this exercise to be undertaken. There is no evidence within the Neighbourhood Plan to indicate that the Green Belt land within the plan area is more, or less sensitive than Green Belt land elsewhere. The final sentence of paragraph 6.16 should be removed accordingly.

Policy NE3 – Green Infrastructure, should not include as a starting point an assumption in favour of the provision of green roofs. This is often impractical; maintenance costs are significant for their occupiers and in large developments a series of green roofs can prove unattractive and out of keeping with the wider area. This reference should be removed from the policy. There is no statutory provisions for seeking, as a starting point, the delivery of green roofs.

Topic 2 – Policies for Built Heritage and Design

Policy BD2 – Encouraging High Quality Design, advises that “contemporary, high quality designs may also be acceptable” as well as schemes that reflect Victorian and Edwardian properties in the plan area”. Contemporary, high quality design schemes that reflect the wider area should be considered acceptable as the norm. The policy should be reworded to support the delivery of high-quality contemporary developments when in keeping with their surroundings.

Topic 3 – Policies for Housing

We have no particular concern with the approach of Policy H1 – New Housing within Existing Settlements, that is based upon current Local Plan policies. However, as is referred to in our response to Section 1, the Council are in the process of undertaking a Local Plan review which will result in Green Belt land release. The policy should, therefore, be clear in confirming that the approach towards delivering housing outlined in Policy H1 will apply to such a point that the Local Plan review is complete.

Policy H2 - Housing Mix should be re-worded. The policy seeks to encourage the delivery of smaller one and two bedroom properties for first time buyers and smaller households. It should be noted that by delivering larger properties for families to move into existing one and two bedroom properties within the villages can be freed up. These are often more affordable than new build homes and provide a starting point for home ownership. The policy should be revised to encourage the delivery of a variety of different house types reflecting market demand and the availability of properties within the area.

Topic 4 – Policies for Infrastructure

Policy INF1 – Supporting Walking and Cycle and Improvements in Local Transport Infrastructure, advises that new development should include the provision of electric vehicle charging points or ensure that they can be retro-fitted easily in the future. Charging point technology is quickly evolving. Whilst a relatively small proportion of homes have an electric or hybrid car this will undoubtedly change over time. That being the case, in the first instance the policy should require the provision of infrastructure to support electric charging points rather than the charging points themselves. Existing electric charging points technically may become redundant as time passes. Property owners should have the opportunity to install an electric charging points that meets their requirements at an appropriate point in time.

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?

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