

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

AUGUST 2018

**REPRESENTATIONS ON BEHALF OF
GALLAGHER ESTATES LIMITED**

Pegasus Group

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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 at Bordesley, to the north of Redditch. A site location plan is attached at **Appendix A**.
- 1.4 Previously representations have been made to Bromsgrove District Council (BDC) in December 2014 with regard to the Bromsgrove District Local Plan 2011-2030 and subsequent to this Hearing Statements were submitted to the Local Plan Examination. A Vision Document and Illustrative Masterplan accompanied these submissions which set out the benefits of the land at Bordesley for residential development. With regard to the APNP the Illustrative Masterplan has been updated accordingly and is attached at **Appendix B**.
- 1.5 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.

1.6 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.

1.7 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 at Bordesley, Bromsgrove.

1.8 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.

1.9 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 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.

- 1.10 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 a 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 West Midlands 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.
- 1.11 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 level has recently been updated with the publication of the revised National Planning Policy Framework on 24th July 2018.
- 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

- 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.
- 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 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 provides an overview of Alvechurch Parish. It notes that with the exception of the built-up area of Alvechurch village, the Parish is washed over by Green Belt, and that future development within the NP area will mean land being taken out of Green Belt via the Bromsgrove District Local Plan Review. It is acknowledged that the APNP cannot change the Green Belt boundary in the Parish, but that it 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 1' 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 an 'Key Aim' of the APNP and serves no purpose in guiding development within the Parish. We would therefore recommend the deletion of this policy as it is covered by Key Aim 2 and General Policy 1 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 at Bordesley (see Site Plan attached at Appendix 1) lies within the Green Belt in the southern area of the APNP, to the east and west of the boundary with Bordesley and adjacent to the northern boundary of Redditch Borough.
- 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 The opening sentence for example states "*new housing development will need to show consideration to the Alvechurch Parish Design Statement and the Alvechurch Historic Environment Resource Assessment*" however this is a design consideration and does not relate to the location of development.
- 5.6 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.

- 5.7 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.
- 5.8 '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.
- 5.9 '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.
- 5.10 '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.
- 5.11 '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. We therefore believe this policy should be deleted.

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- 5.12 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 NPPF paragraph 185, and the basic conditions.
- 5.13 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.
- 5.14 **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.
- 5.15 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.
- 5.16 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.
- 5.17 **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.

- 5.18 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.
- 5.19 **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 paragraph 64 of the recently published NPPF 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.
- 5.20 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.
- 5.21 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.

5.22 **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

5.23 This is repeated in Paragraph 204 of the previous 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.

5.24 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

- 5.25 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.
- 5.26 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.
- 5.27 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 HDNE 1.
- 5.28 **Policy HDNE 3: The Alvechurch Parish Design Statement (APDS)** 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 Parish 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.

- 5.29 **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 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.
- 5.30 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, geological conservation interests and soils. The previous NPPF provided no guidance on what constitutes a 'valued landscape'. However, the courts have held that paragraph 109 of the NPPF 2012 (paragraph 170 of the recent NPPF) "requires a decision-maker to determine whether the relevant landscape is "valued"; and then, if it is, to recognise that enhanced planning status by taking into account the policy that such landscapes should be protected and enhanced".¹
- 5.31 It is also of note that the revised NPPF has added that this should be in a manner commensurate with their statutory status or identified quality 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.
- 5.32 In the absence of any evidence, it is contended that these landscapes should not be afforded development plan protection through the APNP.

- 5.33 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 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. Furthermore, having regard to 'Guidelines for Landscape and Visual Impact Assessment, Third Edition, (GLVIA3), produced in 2013, which deals with the value of undesignated 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 Redditch Road, Bordesley, which lies within View E, 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 the Landscape Statement at Appendix C, and Illustrative Masterplan 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.
- 5.34 **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 at Bordesley would afford opportunities to connect to and improve linkages between green spaces, thereby improving public access to the countryside.
- 5.35 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

- 5.36 ~~Policy LHW 2: Protection of Local Green Spaces~~ designates four areas as Local Green Spaces. Reference to the paragraphs of the NPPF should be updated to reflect the recently published revised national guidance and should therefore read paragraphs 99,100 and 101. Delete this sentence?
- 5.37 **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

5.38 **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 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

- 5.39 **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 at Bordesley 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 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.
- 5.40 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 are 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. Delete? Perhaps add – this is clearly of relevance for any review of the APNP?

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. 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 In addition, 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 AT BORDESLEY, REDDITCH

- 8.1 Gallagher Estates Ltd has a controlling interest in land at Bordesley (site location plan attached at **Appendix A**). Previous submissions to Bromsgrove District Council have been made on behalf of Gallagher Estates Ltd in respect of this site through the emerging stages of the Council's Local Plan, including representation at the Local Plan Examination Hearing Sessions in December 2014. These representations included the submission of a Background Document relating to the suitability of the site for development and an Illustrative Masterplan, which has been updated and is contained as **Appendix B** to these representations.
- 8.2 The area of the site which lies within Alvechurch Parish is encompassed within a wider area identified for potential housing development by Gallagher Estates, which extends beyond the APNP boundary, but lies entirely within Bromsgrove District. As identified on the Illustrative Masterplan the total site area extends to approximately 116.05 hectares, with the total area indicated for residential development extending to some 52.5 hectares; divided into several residential development parcels would could accommodate around 1,300 dwellings in total.
- 8.3 With regard to the Illustrative Masterplan at Appendix B it should be noted that Parcels A, B and C lie outside of the Neighbourhood Plan area.
- 8.4 Parcel D lies to the rear of housing fronting the A441 Birmingham Road, to the south west of Bordesley village, with the southern part of the site bordering the boundary with Redditch District, and the south-western boundary following the line of the River Arrow. This parcel extends to some 6.52 hectares.
- 8.5 Parcels E and F lie to the north of Dagnell End Lane, which forms the boundary with Redditch District in this location, with Parcel E located immediately to the rear of housing fronting the B4101 Dagnell End Lane and the A441 Birmingham Road. Development parcels E and F are proposed to be situated either side of a large area of public open space, which would assist in preserving the setting of the Listed Building at Bordesley Park.
- 8.6 Each development parcel is proposed to contain a children's play area and would be encompassed within a strong landscape framework; ensuring that the development's soft edges would blend with the surrounding countryside. In

addition, the site could deliver community infrastructure in the form of a new primary school and a local centre, as well as maintaining linkages to ensure access to the wider countryside.

- 8.7 The site is sustainably located on the edge of Bordesley Village and the larger settlement of Redditch and would have good access to a range of services and facilities, including public transport links in the form of bus services along Birmingham Road and Dagnell End Road, which provide connections to Redditch Town Centre, Alvechurch and Birmingham. A number of key facilities are in close proximity to the site, including the Abbey Stadium, Leisure Centre and playing fields, with the Arrow Valley Park offering further recreational opportunities further to the south, and the site also affords access to employment opportunities in the local area.
- 8.8 The total site, with all three development parcels, could deliver in the region of 1,300 updated figure to come from UD Friday am 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.
- 8.9 It should also be noted that the development of the additional parcels proposed further to the west of Bordesley, lying outside of Alvechurch Parish and the Designated Neighbourhood Plan Area, would, together with the development of Parcels D, E and F, enable the development of the Bordesley By-pass, which would have the benefit of significantly reducing traffic through Bordesley Village. This would help to address traffic issues that have been raised by residents during the Neighbourhood Plan making process.
- 8.10 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 Bordesley;

- 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 new primary school and local centre to serve both new and existing residents.
- The provision of a comprehensive pedestrian footpath network, retaining the existing public rights of way that cross the site and providing links between local facilities and the development, as well as access to the countryside beyond.

Suitability

- 8.11 The centre of the development site boundary lies approximately 2km (as the crow flies) from the centre of Redditch town centre and is therefore in easy reach of the array of services and facilities that the town centre provides including the Kingfisher Shopping Centre and other shops, supermarkets, first, middle and high schools, railway station, doctors surgery, post office, library, newsagents, police station, church and pubs, all of which are within acceptable walking or cycling distances from the site.
- 8.12 With respect to public transport, the area north of Redditch Town Centre is reasonably well served by the existing bus services. The nearest bus stops to the development site boundary are located on Dagnell End Road B4101 and Birmingham Road A441, with five bus routes currently operating along these routes. The level of bus service provision in the vicinity of the development site boundary is a good starting point to allow the proposed site to be a truly sustainable development. It is also considered that the sustainability of the site could be improved further through either bus service extensions, or through the possible provision of a new dedicated service.

8.13 The site is approximately 2km from Redditch railway station which is located in the town centre. The station, which is operated by West Midlands Railways, forms the southern terminus of the Cross City Line, and trains run north at least every 30 minutes to Four Oaks or Lichfield Trent Valley, via Birmingham New Street. The journey time to Birmingham New Street is 37 minutes. The proximity of the rail station to the site, together with the frequency of service to Birmingham, should encourage a number of people to undertake journeys to and from the city and beyond by train, further enhancing the sustainability credentials of the proposed site location.

8.14 With the exception of the site Green Belt designation, there are no other planning designations that would restrict the development of this site.

Role of the Site in the Green Belt

8.15 The site is located within the area designated as Green Belt to the north of Redditch. In relation to Green Belt the NPPF states:

8.16 "...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."

8.17 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.

8.18 An assessment of the site and development proposals against the five purposes of including land within the Green Belt is contained at Table 1 below.

8.19 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.”

8.20 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

8.21 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.

8.22 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	<p>There is ribbon development in the vicinity of the site at Bordesley, however the existing settlement edge is located along Birmingham Road and Dagnell End Road along the southern edge of the site.</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	<p>The nearest town or large settlement directly to the north of Redditch is the West Heath suburb of Birmingham, some 7.4km from the site. Development on land at Bordesley will therefore not result in coalescence. The nearest settlement (excluding Bordesley) is Alvechurch. The site is located some 3.3km for the southern edge of Alvechurch. Development of land at Bordesley would maintain the integrity of the settlement.</p>
To assist in safeguarding the countryside from encroachment	<p>The landscape of the site and to the north and east is generally characterised by countryside, with occasional built form. To the west is the existing settlement of Bordesley and beyond that the Birmingham-Redditch railway line.</p> <p>To the south is the settlement of Redditch, and the strategic housing allocation at Brokhill. 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	<p>The site is not located within a historic town.</p>
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	<p>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.</p>

Table 1

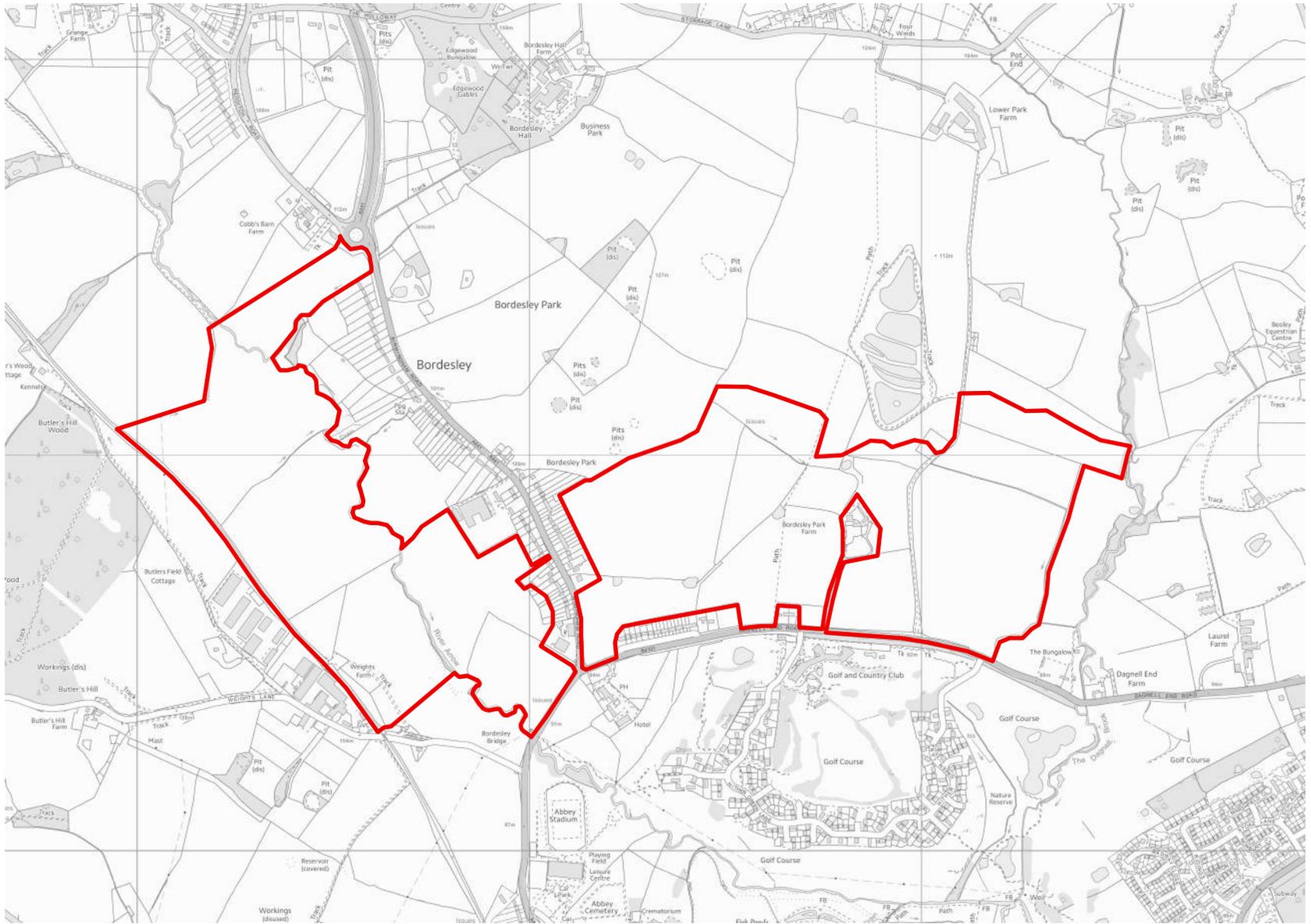
Deliverability

- 8.23 Gallagher Estates 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.
- 8.24 The site at Bordesley represents a sustainable urban extension to the northern most edge of Redditch 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, along with a primary school, local centre and by-pass, that would deliver many of the objectives of the local community, as set out in the Key Aims of the Neighbourhood Plan.
- 8.25 Accordingly, the Parish Council is invited to support the land at Bordesley, as defined on the location at **Appendix A**, as a broad location for future housing development within Alvechurch Parish.

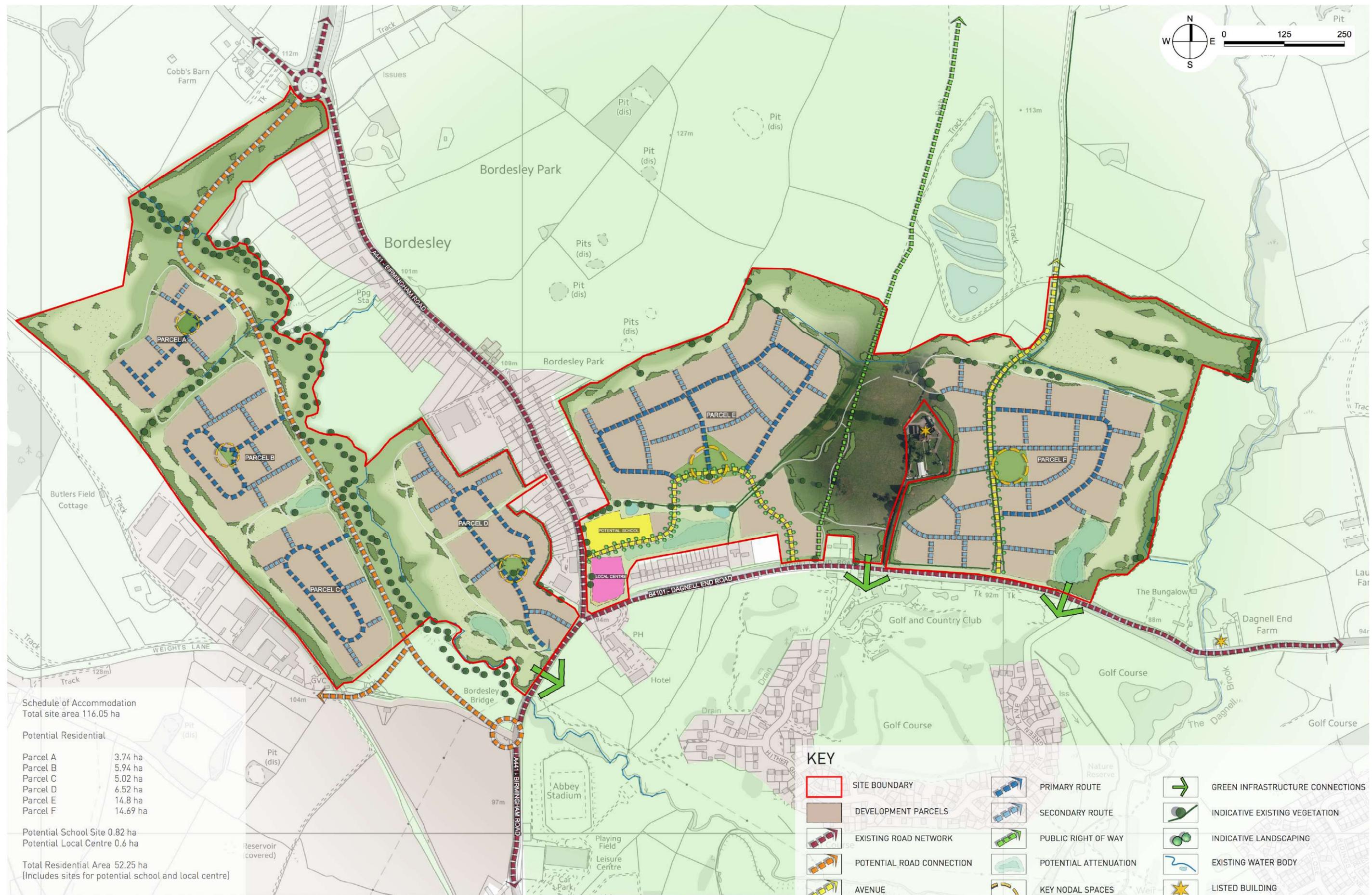
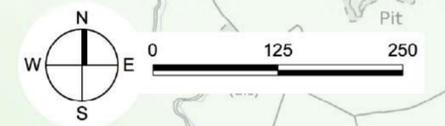
9. CONCLUSIONS

- 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 at Bordesley, adjacent to the boundary with Redditch, represents a significant opportunity to build on the infrastructure that currently exists at Redditch and to create a sensitively designed urban extension, with appropriate recreational and educational facilities 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 at Bordesley as a 'sound' housing allocation through the Local Plan Review and seeks the support of Alvechurch Parish Council in promoting this as a broad location for development through the Development Plan process.

APPENDIX A
Site Location Plan



APPENDIX B
Illustrative Masterplan



Schedule of Accommodation
Total site area 116.05 ha

Potential Residential

Parcel A	3.74 ha
Parcel B	5.94 ha
Parcel C	5.02 ha
Parcel D	6.52 ha
Parcel E	14.8 ha
Parcel F	14.69 ha

Potential School Site 0.82 ha
Potential Local Centre 0.6 ha

Total Residential Area 52.25 ha
(Includes sites for potential school and local centre)

KEY

	SITE BOUNDARY		PRIMARY ROUTE		GREEN INFRASTRUCTURE CONNECTIONS
	DEVELOPMENT PARCELS		SECONDARY ROUTE		INDICATIVE EXISTING VEGETATION
	EXISTING ROAD NETWORK		PUBLIC RIGHT OF WAY		INDICATIVE LANDSCAPING
	POTENTIAL ROAD CONNECTION		POTENTIAL ATTENUATION		EXISTING WATER BODY
	AVENUE		KEY NODAL SPACES		LISTED BUILDING

LAND AT BORDESLEY, REDDITCH - ILLUSTRATIVE MASTERPLAN



APPENDIX C

Landscape and Visual Statement

LANDSCAPE AND VISUAL STATEMENT

LAND AT BORDESLEY, REDDITCH

ON BEHALF OF GALLAGHER ESTATES LTD

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FIGURES:

FIGURE 1: LANDSCAPE STRATEGY

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 Bordesley, north of Redditch.
- 1.2 The site is located within the administrative area of Bromsgrove District, ca. 1km to the north of Redditch, adjacent to the B4101. The site comprises several field enclosures, defined by well-maintained mature hedgerows. There are several small field ponds associated with disused minerals workings within the site. The site falls within an area of Green Belt to the north of Redditch.
- 1.3 There are two matters to consider 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.

2. LANDSCAPE AND VISUAL BASELINE

Site Context

- 2.1 The site is located to the north-west edge of Redditch, Worcestershire. The eastern area of the site comprises an area of approximately 140 hectares and the western area of the site covers an area of approximately 65 hectares.
- 2.2 The eastern part of the site mainly comprises of irregular shaped agricultural fields which are defined by the hedgerows and hedgerow trees. It is generally used for arable farming with occasional horse or sheep grazing. The western boundary of this part of the site follows the existing field hedgerow pattern. Dagnell Brook forms the northern part of the eastern boundary and the southern part defined by the existing hedgerow. The northern boundary of the eastern site area is defined by Storage Lane along with the premises of Lower Park Farm.
- 2.3 The western area of the site comprises small-medium irregular shaped fields, defined by the hedgerows and hedgerow trees. It is located between the Birmingham-Redditch Railway line and A441 Birmingham Road. The western boundary follows the railway line whilst the River Arrow, rear gardens of a number of properties at the southern part of village Bordesley, and the A441 Birmingham Road form the eastern boundary. The existing field boundaries define the northern boundary.
- 2.4 There are three main settlements located close to the site. The large urban area of Redditch is located to the south. Closest to the site, there is an area of 20th century large detached housing situated around the Abbey Hotel Golf and Country Club. Between the eastern and western areas of the site, the village of Bordesley is linear in form and mainly comprised of semi-detached and detached 20th century dwellings with large front and rear gardens. The smaller settlement of Rowney Green is located ca.700m from the northern boundary of the site.

Landscape Character

- 2.5 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.

2.6 At a more detailed level, the site is located within the Bordesley Wooded Estate lands, described by the published assessment as:

2.7 *"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."*

2.8 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

2.9 The site can be split into two parts – the eastern parcel, to the east of Bordesley and the western parcel, to the west of Bordesley. The visual envelope for each part of the site is set out as follows.

Eastern Parcel

- 2.10 From the north, views towards the north-western part of the eastern parcel are gained from Storage Lane; the public right of way network located on higher ground to the west of Storage Wood; the southern edge of Rowney Green; and Lower Park Farm. South of the fishing lakes, a localised ridgeline limits views of the remainder of the eastern parcel.
- 2.11 From the south, the eastern parcel is contained visually by the urban edge of Redditch, including the road corridor of Dagnell End Road (B4101) and the associated vegetation. There are some limited views from properties to the north of Dagnell End Road to the southern area of this parcel due to the rising character of the landform in this location.
- 2.12 From the east, the eastern parcel is more visually exposed due to its rising landform. Potential visual receptors include residents of nearby farms, users of the public right of way network and those travelling along Icknield Street.
- 2.13 From the west, vegetation and built form along Birmingham Road (A441) generally obscures views towards the eastern part of the site, although there are occasional views through gaps.

Western Parcel

- 2.14 From the north, views towards the western parcel are generally screened by dense vegetation associated with the local field pattern, the River Arrow and built form along Redditch Road and Grange Lane.
- 2.15 From the south, potential visual receptors include those travelling along Weights Lane and the A441. In the wider area, views towards the western parcel are largely screened by the urban form of Redditch.
- 2.16 From the west, receptors associated with Butler's Field Cottage, Butler's Wood Cottage, and also those at Weights Farm Business Park will potentially have filtered views towards the site through the vegetation that runs along the railway line. In the wider context, the ridgeline lying in parallel with the western site boundary obscures views from further west. Shortwood and Butler's Hill Wood also provide additional screening.
- 2.17 From the east, residential receptors in properties along Birmingham Road will potentially experience direct views towards the western part of the site due to the elevated ground level and limited vegetation. In the wider context, the majority of

the views towards this parcel are screened by the A441, associated vegetation and the linear built form of Bordesley.

3. LANDSCAPE AND VISUAL CONSTRAINTS AND OPPORTUNITIES

3.1 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.

3.2 Landscape and visual constraints in relation to the site at Bordesley 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 more elevated areas of the site, such as that along the northern edge of the eastern parcel, which increases potential visibility from the surrounding landscape; and
- The presence of a public right of way passing through the site (providing recreational opportunities for potential high sensitivity receptors).

3.3 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 localised undulating topography;
- The location of the site in the context of the existing residential edge of Redditch to the south and Bordesley itself;
- 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 at localised high points, for example near Bordesley Park Farm along the public right of way.

4. ANALYSIS OF POTENTIAL IMPACT ON THE GREEN BELT

4.1 The following section examines the release of this site from the Green Belt in the context of the five purposes of the Green Belt, as set out in the NPPF, in landscape and visual terms.

Table 1: Analysis of potential impact on the Green Belt

Purpose	Analysis
To check the unrestricted sprawl of large built up areas	<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>
To prevent neighbouring towns merging into one another	<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>
To assist in safeguarding the countryside from encroachment	<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.

Creation of a Defensible Green Belt Boundary

- 4.2 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 therefore that to the north of the eastern parcel of the site, a combination of existing field boundary vegetation and new landscape infrastructure planting could form a clearly defined Green Belt boundary. To the west, it is also considered that combination of existing field boundary vegetation and new landscape infrastructure planting could form a clearly defined Green Belt boundary. This would allow the extent of any future development to be retained in line with the existing residential edge of Bordesley.
- 4.3 There is an opportunity for the green infrastructure strategy for the site to include additional planting within it, which will help to break down the scale and massing of built form and provide further containment. These mitigation measure will help to establish and enhance a robust landscaped edge to the proposed development and a definitive boundary to the future Green Belt.
- 4.4 In essence, it is a combination of retained and enhanced landscape features with the locally elevated topography that will serve to provide a 'defensible' Green Belt boundary.