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Dear Sir/Madam,

**Alvechurch Parish Neighbourhood Plan – Regulation 16 Consultation
Representations on Behalf of Barratt Homes, West Midlands**

Harris Lamb Planning Consultancy (“**HLPC**”) are instructed by Barratt Homes, West Midlands (“**Barratt**”) to submit representations to the Alvechurch Parish Neighbourhood Plan regulation 16 consultation. Barratt control land to the north east of the settlement, located between the Birmingham Road, Old Rectory Lane, The River Arrow and M42 motorway. Barratt have met with representatives of Alvechurch Parish Council to discuss the development of this site and its promotion through the Neighbourhood Plan and Local Plan process on a number of occasions. The site has been identified through the Neighbourhood Plan process as the preferred location for residential development outside of the defined settlement boundary within the Green Belt. During the course of the Neighbourhood Plan consultation in July 2014, 52% of the respondents identified the land in Barratt’s control as a preferred location for the expansion of the settlement.

The entirety of Barratt’s land interest is within the Green Belt. As the Neighbourhood Plan was prepared under the previous version of the Framework (2012) it is not proposed as a residential allocation, as the Neighbourhood Plan could not remove land from the Green Belt. This has, however, changed through the new Framework, published during the consultation period. Barratt remain committed to working with the Parish and the District Council through the preparation of this and subsequent Neighbourhood Plans and Local Plans as it is acknowledged that Green Belt land release will be required to meet development requirements.

A Planning Promotional document has been prepared and provided to both the Parish and District Council to support the plan making process. For ease of reference this document is attached to these representations. The document confirms the deliverability of the site and explains why it should be a favoured site for allocation for the growth of Alvechurch in the medium to long term.

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Scope of Representation

Whilst we welcome the approach from a number of parts of the emerging Neighbourhood Plan, it is a short term document. The consultation document acknowledges that Green Belt land release will be required in the future to meet the growth requirements of the District and Alvechurch. That being the case, the Neighbourhood Plan will become out of date relatively quickly following the forthcoming Bromsgrove Green Belt Local Plan review. Our representations to the consultation draft plan should be considered in this context and suggest a possible alteration approach to address this issue.

Set out below are our comments on the consultation draft document.

Section 1 – Introduction and Background

We support the acknowledgement that as one of the largest settlements in Bromsgrove District, Alvechurch is required to take a proportion of the District's future housing numbers. We would also support the acknowledgement that the Parish Council need to work closely with Bromsgrove District Council as part of the Green Belt review and Local Plan review. It is our understanding that the Parish will make it clear to the Local Authority that the land in Barratt's control has previously been identified as the preferred location for the expansion of Alvechurch going ahead to inform both the Green Belt and Local Plan review. In this regard it is our view that it would be helpful if the Neighbourhood Plan included details of the aforementioned consultation exercise so it is clear to the reader the outcome of the consultation exercise.

Green Belt and Status

The Neighbourhood Plan has been prepared in the context of the National Planning Policy Framework 2012. Since the publication of the consultation of the Neighbourhood Plan the replacement National Planning Policy Framework has been adopted (24 July 2018). Unlike the previous version of the Framework the adopted version of the Framework allows for details and amendments to be made through non-strategic policies, including Neighbourhood Plans, where a need for changes to the Green Belt boundary has been established through strategic policies.

Policy BDP3 – Future Housing Employment Growth, of the adopted Bromsgrove Local Plan advises that 7,000 dwellings are required in the District during the plan period (2011 to 2030). It is possible to deliver 4,700 of these dwellings on land outside of the Green Belt. The remaining 2,300 dwellings will, however, need to be provided on Green Belt land that will be identified through a Green Belt and Local Plan review. There is, therefore, a policy in the adopted Local Plan that acknowledges there is a change required to the Green Belt boundaries. The "exceptional circumstances" test has been passed through the preparation and adoption of the Local Plan and its acknowledgement for Green Belt land release is required.

It is noted that the Bromsgrove District Council website advised that the latest five year housing land supply paper was produced in April 2017 and concludes that as of 1 April 2017 the District can demonstrate a 4.5 year supply of deliverable land for housing. There is, therefore, a pressing need for additional sites to come forward for residential development. Given the constraints put in place on development by the Green Belt, it will be challenging for the District to rectify its five year housing land supply shortfall until the Green Belt is reviewed.

It is, therefore, our view that it is a compelling case for the Neighbourhood Plan seeking to review the Green Belt and allocate land for development now. This would be in accordance with the

requirements of the new Framework and the acknowledgement in the adopted Local Plan policies that a Green Belt review is required. It is also consistent with the acknowledgement that, as one of Bromsgrove's District's largest settlements, Alvechurch can be expected to support some future strategic housing to meet the growth of the District.

It is appreciated that this would necessitate further Neighbourhood Plan consultation. It would, however, result in the Neighbourhood Plan being future proofed and becoming a more long term policy document.

Future Development

The recognition that the Parish Council will work with Bromsgrove District Council to ensure that any land released through the Local Authority Green Belt and Local Plan review is in a sustainable location and informed by community consultation is supported. As referred to above, it is our view that the Neighbourhood Plan should explicitly identify the results of the July 2014 consultation that identifies the preferred development site.

The Key Aims

We support Key Aim 1 that seeks to deliver development to meet the current and future needs of all age groups in a growing Parish. It is noted that the Key Aims apply for the period up to 2030. The emerging Neighbourhood Plan acknowledges that for Alvechurch to grow, development is required outside of the Green Belt, however, the Neighbourhood Plan does not allow for Green Belt land release. As a consequence in order to deliver Key Aim 1, the Plan needs to be amended to remove land from the Green Belt, in accordance with the requirements of the new Framework, or an early review of the Neighbourhood Plan is required to identify development opportunities outside the existing settlement boundary within the Green Belt.

General Policy 1 – Actively Involving Local People in the Planning Process

We support recognition that local people should play a positive role in shaping future development proposals through the pre-application process. In this regard Alvechurch Parish have already undertaken substantial work with the local community in order to identify their preferred location for growth. The land in Barratt's control to the north east of Alvechurch has been clearly identified as the preferred location for a notable extension to the settlement through community consultation. This development aspiration should be used to inform the Local Plan review process.

Policy H1 – Locations of New Housing Development

Given that in its current form the Neighbourhood Plan does support Green Belt land release, we have no particular concerns with the approach to the location of development adopted by Policy H1. However, as explained in our response to the "Green Belt" section we are of the view that the new Framework provides the Parish with the opportunity to revisit the Green Belt boundary to release additional land for development if further consultation is undertaken on the Neighbourhood Plan. It is our view that the Neighbourhood Plan should be reviewed to either support Green Belt land release now and identify additional sites for development, or it should be acknowledged that an early review of the document is required in order to expedite the preparation of a replacement Neighbourhood Plan that identifies development opportunities on land currently within the Green Belt following the adoption of the replacement Bromsgrove Plan. It is not possible for the Neighbourhood Plan to meet the full development requirements of the District to 2030 without Green Belt land release.

Policy H4 – Housing Design Principles

Part 7 and 8 of Policy H4 put in place a series of requirements for new residential developments. A number of these requirements have significant cost implications for new schemes that may not be commercially viable in all instances. We, therefore, suggest that the policy is worded to advise that the various criteria are aspirations as opposed to requirements allowing for some flexibility and negotiation when developing new schemes.

Policy H6 – Providing a Mix of Housing Types and Sizes

We are concerned about the prescriptive nature of the policy. The need for different sized houses will change over time. That being the case, even if the suggested mix of property sizes within the policy reflects the needs of a village now (which we would question) it may not reflect the housing needs for the life of the Neighbourhood Plan. Furthermore, any developer looking to deliver new houses within the village will seek to establish what local demand is at that time in order to deliver market facing products. The size of the properties proposed will reflect market requirements.

Part 3 of the Policy should be removed in its entirety in order to ensure flexibility in the delivery of house types. The size and mix of properties should be determined on a site by site basis collecting best information available at that time.

Policy H7 – New Housing, Improved Services and Facilities

Planning obligations can be sought with new developments to offset the impact of the proposed development. For example, if a new residential development will result in new pupils in the area, and there is no capacity in the local schools, it is appropriate for a planning obligation to be sought to allow for increased school place provision. This approach is in accordance with the requirement of the Community Infrastructure Levy (CIL) Regulations 2010, which advises at paragraph 122 that obligations must be:

- Necessary to make the development acceptable in planning terms.
- Directly related to the development; and
- Fairly and reasonably related to the scale and kind to development

Planning obligations cannot be used to address existing deficits in local facility provision. That being the case, it is our view that Policy H7 should be amended to make it clear that planning obligations will only be sought where they meet the requirements of the CIL122 tests.

Community Action – Planning Future Education

The community action policy seeks to address a matter that is not planning related i.e. school catchments. The admission policies of the local schools are not covered by the Planning Acts. This policy should be removed from the document.

Policy LHW4 – Sports, Leisure and Recreation Facilities

Policy LHW4 advises that priority will be given to the provision of, amongst other things, improvements to the riverside walk along the River Arrow and linkages to green space. The land in Barratt's control adjoins the River Arrow. Through the development of the site improvements can be made to the riverside environment and the towpath.

Community Action 8 – Future Growth of the Parish

As referred to above, we support the recognition that the growth of Alvechurch is constrained by the Green Belt and that a Green Belt review will be required in order to allow the settlement to grow. Bromsgrove District cannot accommodate its own housing growth requirements without releasing Green Belt land for development (and will need to play a role in meeting the growth requirements of Birmingham City). As one of the largest settlements in the district Alvechurch will have an important role to play and help to meet the future growth requirements.

The recognition that the Neighbourhood Plan will need to be reviewed following the adoption of the replacement Bromsgrove Local Plan is welcome. However, as referred to in our response to the "Green Belt" section, the new Framework provides the opportunity to enable the Neighbourhood Plan to review Green Belt boundaries at this time subject to further consultations. It is, therefore, our view that the Parish should actively consider opportunities available to amend the emerging Neighbourhood Plan to allocate land for development, the land in Barratt's control should be the preferred site for development as detailed in the attached Promotional Document. Alternatively, Policy Community Action 8 should commit to a Neighbourhood Plan review immediately following the adoption of replacement Bromsgrove District Local Plan so that policies can be put in place to meet the emerging plan's development aspirations.

I trust you found this letter useful. If you have any queries, or would like to discuss this matter further, please do not hesitate to contact me.

Yours faithfully



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Cc Jo Hess – Barratt Homes