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Date: 08 August 2018**

By email

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Strategic Planning
Bromsgrove District Council
Parkside
Market Street
Bromsgrove
B61 8DA

Dear Sir/Madam,

Alvechurch Parish Neighbourhood Plan Consultation

RPS has been instructed by Messrs Wild, Johnson, McIntyre and Fisher (the Consortium) to undertake representations on their behalf in respect of the Alvechurch Parish Neighbourhood Plan (APNP) Consultation. The Consortium has controlling interests on an area of land east of Callow Hill Road which falls within the Alvechurch Neighbourhood Plan area. RPS has recently promoted the land through the pre-submission APNP review, where representations focused on the promotion of the site coming forward within the APNP. It is noted that the Alvechurch Steering Group await the Green Belt Review to be undertaken by Bromsgrove District, where it is anticipated Green Belt land will be released within Alvechurch to help meet the 2,300-dwelling deficit. Therefore, at this stage the Alvechurch Steering Group has not allocated sites for residential development within the Neighbourhood Plan.

The land to the east of Callow Hill Road was reviewed within the Strategic Housing Land Availability Assessment (SHLAA) 2015 (BDC89) and is categorised as a site with 'Green Belt Potential' with no physical constraints, the only true restriction being its location within the Green Belt. Since initial representations further detailed work has been undertaken to address concerns that the SHLAA has included within its analysis. The site will be promoted for residential allocation through the review of the Green Belt and the Local Plan due late 2018/early 2019.

Policy Update

Bromsgrove District Local Plan

The Bromsgrove District Local Plan was adopted March 2015, with the admission that a Green Belt review was required to meet the need for the remaining 2,300 homes. Once a Green Belt review has been undertaken, then additional sites can be allocated through the Local Plan Review. The publication and consultation on Issues and Options is due in late September 2018, this will include the consultation on the methodology for the site selection; including the Green Belt Review. The Green Belt Review will identify areas of land within the District that perform worst against the five Green Belt purposes, taking consideration of the need to promote sustainable patterns of development. The parcels of land identified will then be considered via the Local Plan Review.

Draft Alvechurch Parish Neighbourhood Plan

After undergoing pre-submission consultation October/November 2017 and reviewing comments expressed by consultees, the Neighbourhood Plan Steering Group submitted the amended Plan to Bromsgrove District Council (BDC) June 2018. BDC are satisfied with the APNP and invite consultees to comment on the Plan within a six-week period. The remainder of this letter will comment on, where necessary, the sections and policies within the plan.

Section 1: Introduction and Background and Section 2: Alvechurch Parish Today and Key Issues

RPS welcomes the proposed arrangement that the Parish Council has with regard to the Green Belt. 90% of BDC is currently designated as Green Belt, and when formally adopting their Local Plan in 2015 it was under the premise that 2,300 homes would be sourced on Green Belt land through a Green Belt Review in the future. With Alvechurch being one of the larger settlements within the District, it will be expected to accommodate housing growth in the future.

Section 2, Paragraph 2.7 states that the APNP will need to be reviewed once the Green Belt Review has been undertaken. RPS agrees with this statement, and welcomes a APNP review once the Local Plan has been adopted. This is supported by paragraph 2.13, where the Parish Council admits that Alvechurch Village no longer has areas for residential development and will look towards the edge of the village to release green belt land in the most sustainable locations. Appendix 1 of this representation includes a Site Delivery Document prepared on behalf of the Consortium, including a masterplan of the site and technical evidence, to demonstrate the deliverability of the land at Callow Hill Road as a sustainable residential development.

Section 4: The Policies of the APNP

Topic 1: Policies for Housing

Policy H1 sets out the criteria to support applications for residential development, RPS agree with the majority of the criteria, criteria (a) states that new housing development will be supported in principle if *'it is located within the designated Alvechurch Village settlement boundary'*. Paragraph 2.13 pg. 14 states that *'if Alvechurch village is to have more sustainable and affordable housing after 2023... then land around the edge of the Alvechurch Village will need to be released'*. This clearly points to the need to review the APNP and the settlement boundaries to accommodate additional housing.

Policy H7 looks at the improvement of services and facilities including the conservation of wildlife and creation and maintenance of canal-side and countryside footpaths. RPS would like to refer back to Appendix 1 which includes the Delivery Document for the proposed site, which runs alongside the Worcester and Birmingham Canal. The proposal intends to enhance the area and encourage the integration of the village to encourage current residents to enjoy the area.

Topic 3: Policies for Leisure, Health and Well-Being

Policy LHW 3 encourages the improvement and protection of open spaces, and lists the Worcester and Birmingham Canal and towpath as 'open space valued by the community'. RPS has communicated with the Canal and River Trust and gained positive feedback on the prospect of residential development running alongside the canal. The proposed masterplan for the land to the east of Callow Hill Road has since been adapted, mainly altering the position of the footbridge from the development to the land to the east. The proposal seeks to enhance the canal and towpath by providing a footbridge linking the development to the open space for future residents to enjoy.

Policies LWH 1: Healthy Environments and Health Care Facilities, LWH 3: Improvement to and Protection of Open Spaces, and LWH4: Sport, Leisure and Recreational Facilities refer to the financial contributions from sites of 10 dwellings or more. RPS request each of these policies should include a consideration into financial viability on a site by site basis so the delivery of housing within Alvechurch parish is not put at risk due to funding.

Topic 5: Policies for Getting Around – Transport

Policy GAT 1 looks into the considerations that developers should give to future residents manoeuvring around the area. RPS, suggest including reference to considering the financial viability of schemes under criteria 3f where the plan refers to the provision of electric vehicle charging infrastructure, as this may affect the viability of a development.

Paragraph 4.383, pg 108 encourages the use of traffic calming measures to improve safety in Alvechurch Parish. RPS agree with this and pointed out that the consortium proposes to work with Worcestershire County Council to create a safe environment for current and future occupiers travelling to and from the proposed site on the land to the east of Callow Hill Road.

Section 5: Future Growth in the Parish and Section 6: Monitoring and Review of the Plan

RPS commend the Parish Council's approach to working pro-actively with BDC. RPS agree that the Neighbourhood Plan should be reviewed, which would include a review of the settlement boundary to accommodate additional housing, once the BDC Local Plan has been reviewed. Para 4.396 states that the next Neighbourhood Plan Review is likely to take place in 2022/23, however the Bromsgrove District Local Development Scheme Programme looks at adopting the new Local Plan early 2021. RPS agree that the NP should be reviewed every five years, however once the Bromsgrove District Local Plan has been adopted the Parish Council should look to review the NP prior to 2022/23 to address any policies that may conflict between the two documents and address any areas that may potentially be released from the Green Belt within Alvechurch. The NP Steering Group may want to reconsider changing the wording to 'the first review is likely to take place once the Bromsgrove District Local Plan has been reviewed and adopted'.

Conclusion

To conclude, RPS supports the draft Neighbourhood Plan prepared by Alvechurch Parish Council, and commend the work undertaken by the Steering Group in preparing the document. The Neighbourhood Plan seeks to address the long-term requirement of housing and that Green Belt land will need to be released to accommodate this.

In addition to the Site Delivery Document prepared for the site included within Appendix 1, the previous representations made by RPS November 2017 is included within Appendix 2 for reference.

If could please notify me via email of the local authority's decision on whether this neighbourhood plan is made, it would be appreciated.

Should you require any further information, please contact me on the details below.

Yours sincerely,
for RPS

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APPENDIX 1 – SITE DELIVERY DOCUMENT



Creating new homes
Land East of Callow Hill Road, Alvechurch

Site Delivery Document

November 2017

File Ref	JBB8105	Date
Prepared by	PM	Nov 17
Checked by	TP	Nov 17

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1 Introduction

The purpose of this document is to promote this site for residential development by demonstrating that the site can be successfully delivered in a manner that respects the character of Alvechurch whilst providing a sustainable development in accordance with national and local planning policy.

This document has been produced by RPS Planning and Development ('RPS') on behalf of the landowner.

The document demonstrates the suitability of the land to the east of Callow Hill Road, Alvechurch for residential led development.

This document comprises the following chapters:-

- Chapter 2 looks at the context of the site;
- Chapter 3 then assess the site and the potential for development;
- Chapter 4 provides a Masterplan framework; and
- Chapter 5 concludes the document.



Site Plan

2 Site Context

The site is located to the north-west of Alvechurch, a village located within Bromsgrove District, to the north-east of Bromsgrove town, between Birmingham and Redditch.

Wider Context

Alvechurch benefits from a railway station on the Cross City line which links Redditch to Birmingham and beyond to Lichfield. There is also a bus service linking to Birmingham and Redditch, with bus stops on Birmingham Road and Redditch Road. There are a range of services and facilities located along Red Lion Street, Bear Hill and Radford Road; including a number of shops, restaurants, pubs and a doctor's surgery. The site's accessibility to existing services and facilities is illustrated on the facilities map overleaf.

Site Location and Description

The site is currently located outside of the settlement boundary and within the Green Belt. A full Green Belt review will be required following the adoption of the Bromsgrove District Plan, to ensure that land can be identified and allocated via a Local Plan Review to ensure that a further 2,300 homes can be delivered.

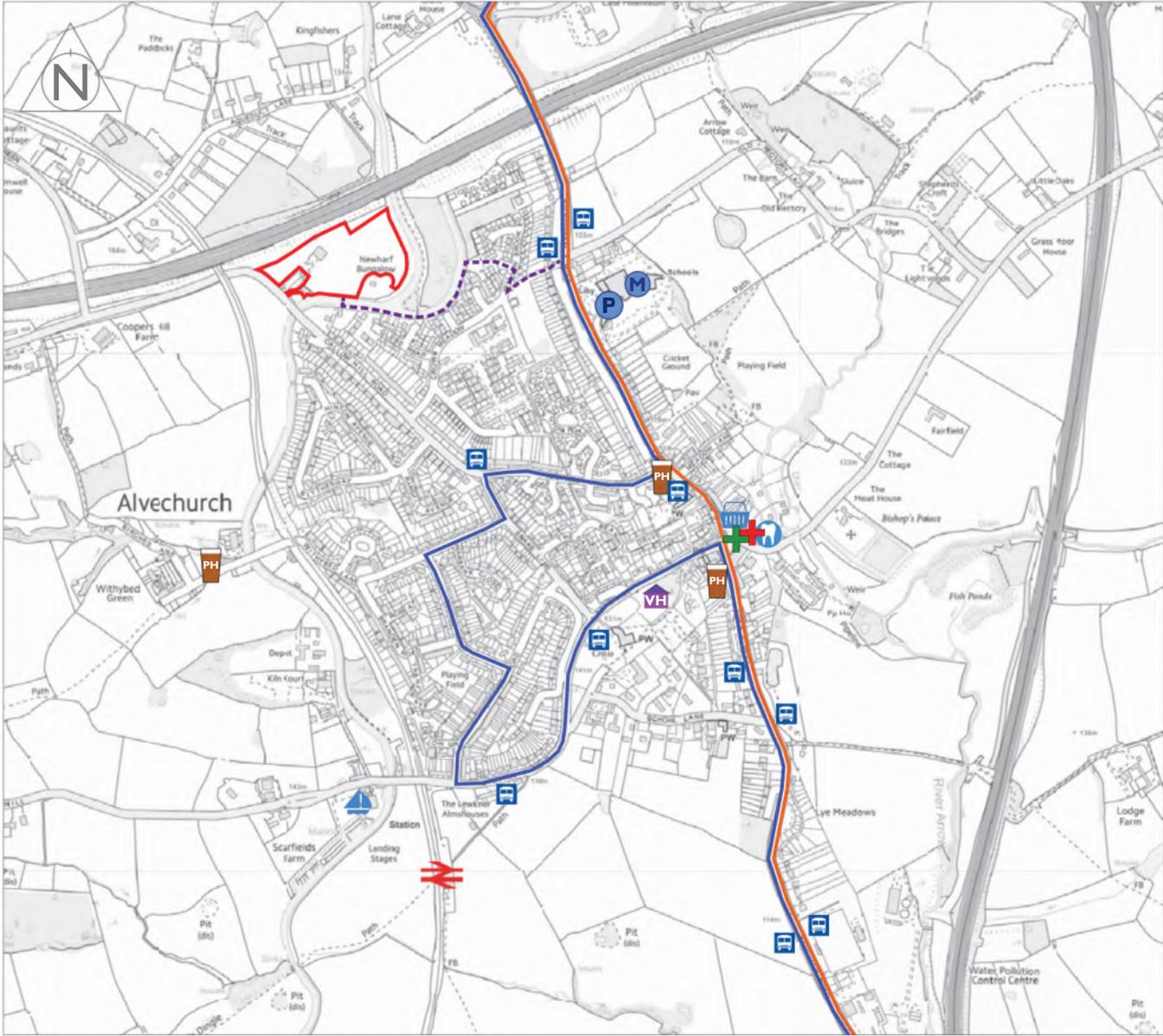
The site is approximately 3 hectares in area and is contained by the M42 motorway to the north, the Worcester and Birmingham Canal to the south and east, and Callow Hill Road to the west. A working farm, several cottages, a bungalow and kennels are adjacent to the site.



Aerial Photograph of Alvechurch

Key

-  The Site
-  Bus Route 182/183
-  Bus Route 146
-  Bus Stop
-  First School
-  Middle School
-  Alvechurch Train Station
-  Convenience Store
-  Pharmacy
-  G.P.
-  Dentist
-  Public House
-  Village Hall
-  Public Footpath link
-  Marina



Facilities Plan

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Planning Policy Context

Introduction

In order to provide an appropriate policy context overview, the key Green Belt, housing delivery and design related policy documents which have been used to shape this document are referred to below.

National Policy



National Planning Policy Framework (NPPF)

The NPPF charges local planning authorities with significantly boosting housing supply (paragraph 47). The NPPF also enforces the need to protect the Green Belt. Paragraph 83 sets out that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. When defining Green Belt boundaries, paragraph 85 states that they should be defined clearly, using physical features that are readily recognisable and likely to be permanent.

The NPPF outlines the presumption in favour of sustainable development indicating that planning applications should be considered in accordance with this presumption where development plan policies are out of date. Where policies are up to date and conform to the NPPF, it is expected that planning applications will be permitted where they conform to the development plan and no material considerations indicate otherwise.

The NPPF explains that:

"...local planning authorities should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth..." (Paragraph 17)

There is therefore a clear emphasis on delivering development which will both stimulate the economy and deliver the needs of local communities.

Local planning authorities should ensure that their Local Plan meets the full needs for market and affordable housing and identify key sites which are critical to the delivery of housing over the plan period. This is also to include working together with neighbouring authorities to meet development requirements which cannot be wholly met within their own areas (paragraph 179). A specific supply of developable sites should be identified and updated annually. Local planning authorities should also set out their own approach to housing density to reflect local circumstances.

Design is an important feature of the NPPF: it is important to plan positively for high quality and inclusive design for all development. High quality design and good standards of amenity are important for all existing and future occupants of buildings. Design should go beyond visual appearance and architecture, to address the connections between people and places and the integration of development into the built and natural environment.

Local Planning Policy

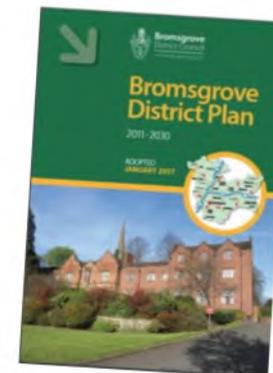
The Bromsgrove District Plan 2011- 2030 was adopted on the 25th January 2017. The adopted Plan forms part of the statutory development plan for the district, setting out the Council's vision and strategy for the area until 2030 and will provide the basis for decisions on planning applications.

The BDP covers the administrative area of Bromsgrove District and replaces the 'saved' policies of the Bromsgrove District Local Plan (Adopted 2004).

The BDP requires that a full Green Belt Review will be carried out, to ensure that land can be identified and allocated via a Local Plan Review to contribute to the remaining 2,300 homes required to achieve the housing target of 7,000 by 2,300. The timing of this review will be determined by updated evidence including the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory. Once the review is completed, outcomes will then be incorporated into the Local Plan Review.

The relevant policies within the adopted District Plan are:

BDP3 - Future Housing and Employment



This policy sets out the development targets for housing and employment in Bromsgrove District up to 2030, emphasising the importance of maintaining a 5 year land supply. Currently the Council have identified that approximately 4,700 homes will be delivered without having to develop in the Green Belt. The Council have a housing target of 7,000 new homes by 2030. The policy identifies the need for a Green Belt Review to be undertaken to identify land for housing beyond 2023.

BDP4 – Green Belt

Approximately 90% of Bromsgrove District is currently designated as Green Belt. The policy seeks to protect the Green Belt, whilst setting out the type of development which would be appropriate. As well as outlining the issues that will be addressed and the approach that will be adopted in the Green Belt Review, which is due to be undertaken in advance of 2023.

BDP7 – Housing Mix and Density

Within this policy, proposals for housing must take account of identified housing needs in terms of the size and type of dwellings. To ensure mixed and vibrant communities are created, development proposals need to focus on delivering 2 and 3 bedroom properties. On schemes of 10 or more dwellings it is accepted that a wider mix of dwellings types may be required.

BDP 21 – Natural Environment

This policy aims to safeguard and enhance the local distinctiveness of the District provided by the natural environment. Within the policy the Council require developments to take into account the following five components:

- Protect and enhance core areas of high nature conservation value
- Protect and create corridors and ‘stepping stones’
- Enhance restoration areas
- Protect and create buffer zones – areas that protect core areas, restoration areas and ‘stepping stones’ from adverse impacts in the wider environment
- Ensure sustainable use areas – areas of surrounding land that are managed in a sustainable and wildlife friendly way

Other relevant policies are:

BDP8 – Affordable Housing

BDP10 – Homes for the Elderly

BDP19 – High Quality Design

Supplementary Guidance Documents

The following relevant Supplementary Planning Document continues to apply under the Bromsgrove Development Plan (2017) until they are superseded.

SPG 8 – Alvechurch Village Design Statement

Alvechurch Village Design Statement was produced by the Parish community and Steering Group, adopted by Bromsgrove District Council in November 2005. The Design Statement aims to raise the rural and historic character awareness by providing design principles that should be encouraged with new development. The proposal would conform to such guidance.

Draft Alvechurch Neighbourhood Plan, September 2017

Alvechurch Parish Council via its Neighbourhood Plan Steering Group has produced a draft neighbourhood plan for the period up until 2030. The Plan is currently going through a final week period of consultation prior to the formal submission to Bromsgrove District Council.



POLICY 2: Locations for New Housing Development

Proposals for new housing will be supported in principle if they meet the following criteria:

- a. The site is located within the designated Alvechurch Village settlement boundary
- b. The redevelopment of brownfield land will be prioritised
- c. Redevelopment would not lead to the loss of open space, community asset or employment uses, which are desirable to maintain.
- d. Development should not extend existing ribbon development and should contain the spread of the Village, by promoting infilling up to its natural physical boundaries
- e. Criteria for defining development boundaries: boundaries should follow clearly defined physical features such as: walls, fences, hedgerows, roads, streams, and water courses in general. However, some development boundaries may follow along the rear of built development rather than physical features to prevent inappropriate back land development, for instances where dwellings have large back gardens
- f. The development would not have an adverse impact on the local landscape, natural environment or heritage assets

g. The scale, height and form of the proposed development will fit unobtrusively with existing buildings and spacing between buildings would respect the character of the street scene

h. The development would not adversely impact on the existing residential amenity of adjoining occupiers

i. To meet sustainable criteria new development where possible should be located within 15 minutes and no more than a 20 minutes' comfortable walk of the Village centre at a comfortable pace

j. The Neighbourhood Plan should be used as a whole

The above Policy requires new housing development within the settlement to be located within a sustainable location. The land East of Callow Hill Road conforms to the criteria, and would therefore be classed as a suitable extension to Alvechurch.

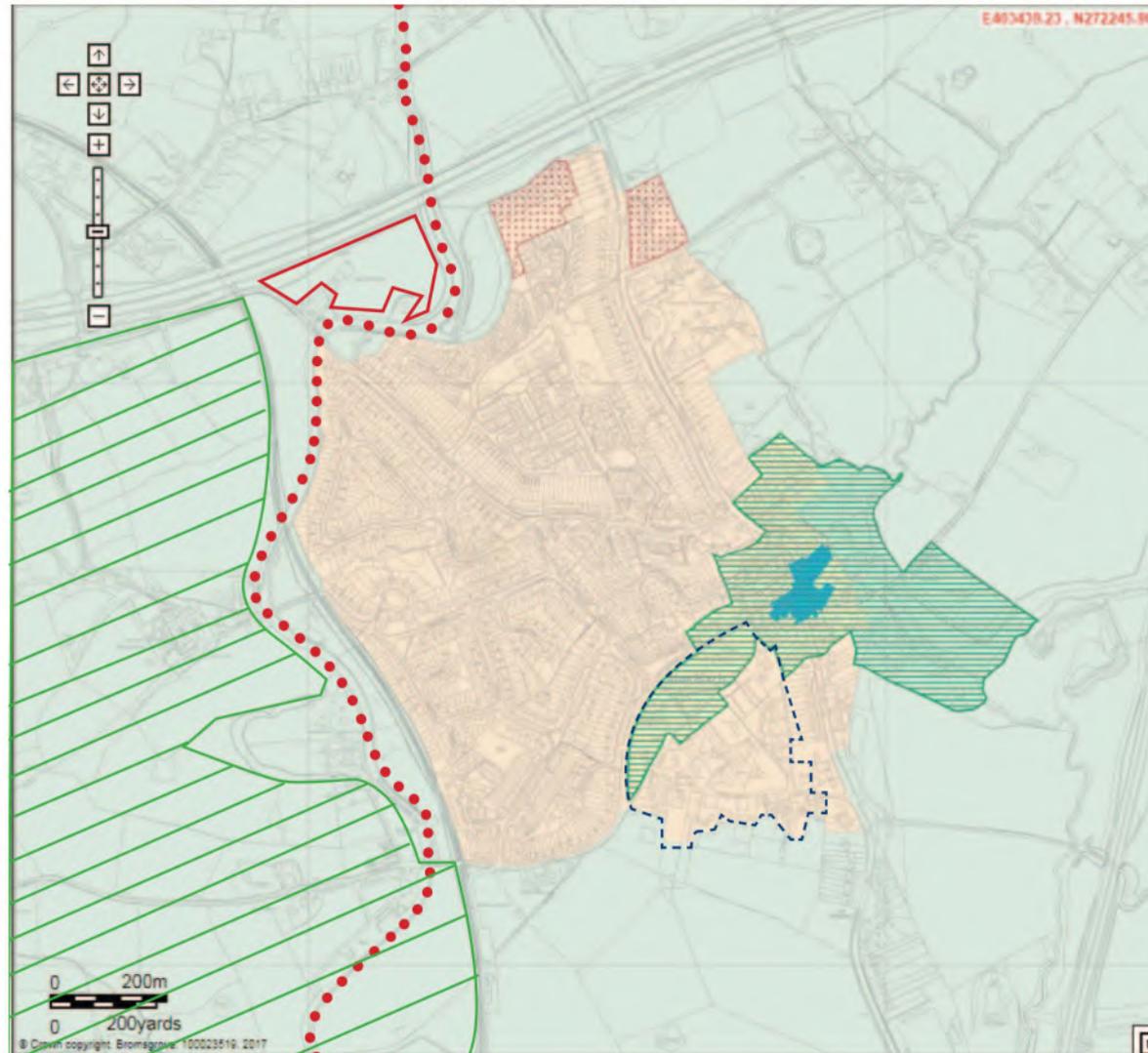
Additional Policies relevant to the development:

- Policy 4 – Affordable housing on rural exception sites in the Green Belt
- Policy 5 – Housing design principles
- Policy 6 – Sustainable development through design
- Policy 7 – Providing a mix of housing types and sizes
- Policy 12 – Protecting landscape and open views
- Policy 13 – Access to the countryside
- Policy 14 – Protection and enhancement of the natural environment
- Policy 17 – Improvement to and protection of open spaces

The Alvechurch Neighbourhood Plan is not yet adopted and therefore limited weight can be given to it; although appropriate engagement with this process will be undertaken as part of the site promotion.

Legend

-  Conservation Area
-  Green Belt
-  Landscape Protection Area
-  Residential Area
-  Shopping
-  Low Density Area



Bromsgrove District Plan Proposals Map

3 Site Assessment

The application site extends to approximately 3ha (7.4 acres) and is located on the north-western edge of Alvechurch, approximately 1.2km from the village square.

Existing Site Features

The site is contained by the M42 motorway to the north, the Worcester and Birmingham Canal to the south and east, and Callow Hill Road to the west. Farm and associated buildings, cottages, a bungalow and kennels are currently on-site.

Local Amenities

The site has access to a wide range of facilities and services within Alvechurch. The village square, located within approximately 12 minutes' walk of the site, features a number of small shops and restaurants. Other facilities currently within Alvechurch include a first and middle school, Sports and Social Club, a number of public houses, and churches.

In addition to these local amenities, a wide range of services and facilities are available within Redditch Town Centre. The nearest bus stop is on Blythes Way, which is within approximately 500 metres from the centre of the site and is safely accessible on foot. There are two regular bus services running through Alvechurch: the 182/183 service and the 146 service. These two services run Monday –Friday and the latter also runs on a Saturday. The buses serve Bromsgrove, Redditch and Cotteridge. The Local amenities are mapped out on page 3.



View across the site



View across the site



Existing farm buildings on the site

In addition, there are numerous bus services which run from Redditch Town Centre, providing connections to nearby centres such as Birmingham, Worcester and Bromsgrove. Alvechurch railway station is located approximately 1.4km from the site. This station is served by trains running to Redditch, Four Oaks, Lichfield City and Lichfield Trent Valley. London Midland operates a 20-minute frequency service through Alvechurch towards Lichfield with calling points at Longbridge, University, Five Ways, Birmingham New Street and Sutton Coldfield.

The site is within close proximity to the M42 which links with the M40 to the east which provides a direct route into London, and the M5 to the west which provides a direct route to the south-west of the country.

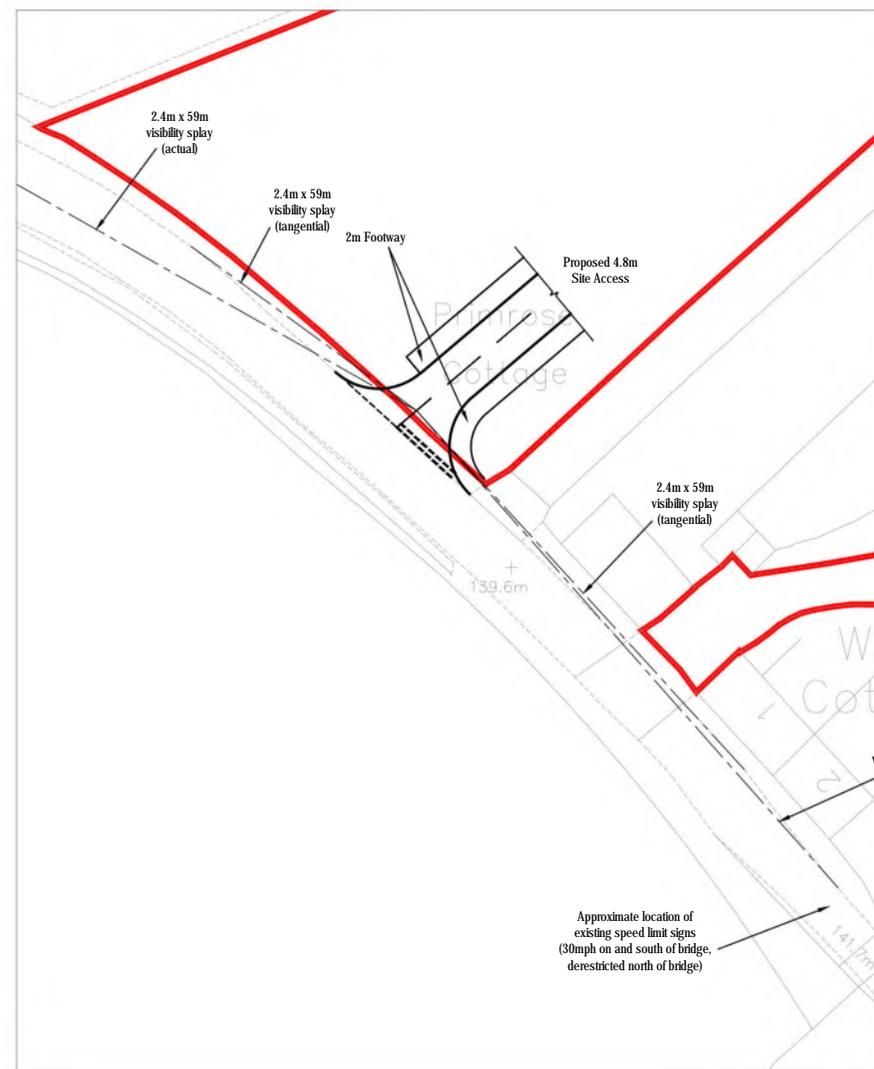
The A441 is also within close proximity to the site offering good access to Birmingham to the north and Redditch to the south.

Access

An initial highways assessment and access design has been carried out by RPS Transport. In addition to this, an Automatic Traffic Counter (ATC) was placed along Callow Hill Road in the vicinity of the proposed site access to continuously record vehicular speeds over a seven day period.

Callow Hill Road is a public highway subject to the national speed limit. The speed limit reduces to 30mph at the southern edge of the site, at Callow Hill Road bridge (over the Worcester and Birmingham Canal) prior to entering Alvechurch. The results of the ATC showed the 85th percentile speeds recorded along Callow Hill in the vicinity of the proposed access junction were 33.8mph in the northerly direction (heading out of the village) and 35.1mph in the southerly direction (towards the village). In agreement with Worcestershire County Council a proposed junction design, achieving visibility splays of 59m in either direction has been agreed (this is shown opposite). Manual for Streets (MFS) sets out that 59m visibility is appropriate for speeds of up to 37mph. The junction therefore would secure a visibility splay in excess of the minimum required for average vehicle speeds along this stretch of Callow Hill Road.

There are no existing footways along Callow Hill Road between the site access and the canal bridge to the south. In order to facilitate a safe and attractive access to the site by non-car modes, a new foot and cycle bridge across the Worcester and Birmingham canal is proposed, tying into the exiting towpath that runs along the canal's western boundary.



Proposed Access Achieving 59m Visibility Splay

From the southern side of the canal it would be possible to reach Heron Close or Cyget Close via the towpath and onwards via the existing pedestrian and cycle routes into Alvechurch, so connecting the site via sustainable means to existing local amenities to the south and east of the site.

The land to the south of the canal, surrounding the towpath appears to be owned by the Canals and River Trust (formerly British Waterways). The existing towpath widens at the point where the proposed footbridge is positioned and therefore there should be sufficient space to erect the foot/cycle bridge as shown. Further technical work and conversations with the landowner will commence to ensure this is a practicable solution.

Safe and attractive vehicular and pedestrian access can be provided to the site to enable development.

Ecology

A Preliminary Ecological Appraisal, including a walkover of the site has been undertaken by RPS Ecologists. This has identified the presence of the protected Worcester and Birmingham Canal Local Wildlife Site (LWS). By providing a landscaped buffer zone between the development and the Canal as shown on the concept plan (p.19) and through the adoption of appropriate best practice measures to protect the canal, any potential impacts upon the LWS have been minimised. Additional measures would include protective fencing and surface water drainage management to minimise risk of pollution incidents. Facilities for the disposal of litter and dog faeces would further minimise impacts from recreational use.

There is an existing line of trees along the site boundary which is shown on the masterplan to be left undisturbed. The grassland to the south-east of the site is of local conservation value and this area is also left undisturbed. A full Phase 1 walkover assessment will be undertaken in future to ensure there are no adverse impacts from the potential development

The site has some potential for protected species or other species of conservation interest. Therefore, surveys to assess whether protected species are present will be undertaken prior to development.

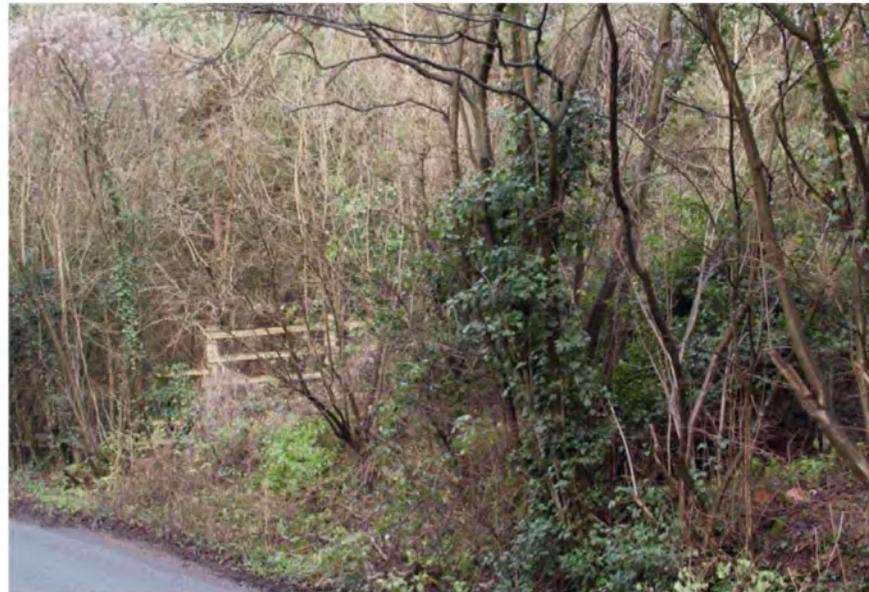
Overall, development on the site would not lead to any significant ecological harm.



Worcester and Birmingham Canal



Grasslands to the south-east



Existing line of trees

Landscape

A Landscape Appraisal has been undertaken by RPS Landscape Architects. Following a visit to the site, it is apparent that the principle landscape components within the Site and its immediate context include the following resources:

- The existing trees and hedgerows to the boundaries including the plantation landscape buffer to the M42 and the landscaped embankment adjacent to the canal;
- The public towpath adjacent to the canal and the opportunity it provides for people to access the canal network and the wider countryside;
- The opportunity of the Site to improve biodiversity and sustainability by creating green infrastructure, Sustainable Urban Drainage Systems and public footpaths / cycle routes through the Site linking with the existing networks.

The Site's positive and negative visual issues are:

- The nondescript agricultural buildings on the site are visible from the Callow Hill Road bridge, although filtered through vegetation (these buildings would be removed upon development); and
- The site is largely screened from visual receptors on the canal and towpath except from near Callow Hill Road due to the trees and hedgerows adjacent to the canal and because of the embankment adjacent to the eastern boundary.

The Landscape Opportunities and Constraints Plan (page 21) illustrates recommended landscape buffer and green infrastructure zones to be created adjacent to the canal, adjacent to Callow Hill Road and on the higher ground within the site.

Given the provisions within the Masterplan, development on the site would not lead to any adverse impact upon landscape value.



The public towpath of the Worcester and Birmingham Canal



Screening from Worcester and Birmingham Canal



Agricultural buildings to New Wharf Farm

Built Heritage

A desk-based Built Heritage Assessment has been carried out by RPS CgMs for the site. The assessment has not identified any built heritage issues that would preclude development of the study site.

There are no scheduled monuments or listed buildings within the study site and the site is not within a Conservation Area. There are two Grade II* and nineteen Grade II listed buildings within a 1km radius of the study area. The desk-based assessment has concluded that due to the distance from the study site and intervening built development, providing the development is appropriately laid out then the Listed Buildings and their settings are not expected to be affected.

There is a non-designated heritage asset – the canal wharf located to the south-eastern boundary of the site. An outbuilding associated with the canal wharf is considered to possess historic and group values but at a local level only. This has been taken into account in the Masterplan which proposes a sympathetic layout to ensure development on the site does not impact any nearby heritage assets.

Archaeology

A desk-based assessment for the site has been undertaken by RPS CgMs. It has not identified any archaeological issues that would preclude development of the site.

No World Heritage Sites or Scheduled Monuments would be affected by development within the site. There are two archaeological monuments recorded within the proposal site, former clay extraction pits and a canal wharf. According to the Historic Environment Record, there is little to no potential of remaining environment remains relating to the clay extraction pit. Existing outbuildings which once formed part of the canal wharf lie within the site and are considered to be of local significance due to their archaeological interest. The development proposals include the protection of these buildings and their archaeological interest is therefore safeguarded.

There is considered to be a low/negligible potential for the proposal site to contain any other significant archaeological remains and therefore this is not considered a constraint to developing the site.

Noise

A desk-based Noise and Vibration appraisal has been undertaken by RPS Acousticians. It is apparent that the M42 to the north of the site is the nearest noise generating source. It is also however known that through modern building materials and practices, the attenuation of noise from sources such as road and rail links, can be sufficiently reduced to provide enjoyable living conditions.

As preceded by the approved development to the east of the site fronting Birmingham Road, satisfactory internal acoustic environments can be achieved through appropriate ventilation systems are provided so that windows can remain closed to provide attenuation to external noise where necessary. Satisfactory external acoustic environments in gardens has been achieved by designing the layout of surrounding houses to provide the requisite screening to noise from the M42 and/or Cross-City Line railway. These are common measures to control noise have been widely accepted to enable residential developments in areas affected by noise from major transport links.

Vibration from rail lines is usually negligible at most, given the distance from the site it is not anticipated that there would be an issue with vibration to any potential residential development.

On the basis of the above, there are no reasons due to noise or vibration to deem the site unsuitable for residential development.

Flood Risk

A Preliminary note on flood risk and surface water drainage has been produced by RPS Hydrologists. The note has confirmed that the site is at a low risk of flooding from fluvial or pluvial sources; the Environment Agency Flood Map shows the site to be outside Flood Zones 2 and 3, and hence located within Flood Zone 1. The nearest natural watercourse is a small tributary of the River Arrow, which flows in a southerly direction approximately 500m east of the site. The main channel of the River Arrow is approximately 400m beyond this. The closest mapped floodplain is associated with the River Arrow; the floodplain is confined to a narrow corridor adjacent to the watercourse at a level more than 10 m below the site. As such, floodplain compensation is not an issue for development on this site.

The Level 1 Strategic Flood Risk Assessment (SFRA) does not identify any historic flooding incidents on the site.

The site is adjacent to the Worcester and Birmingham Canal. The risk of canal flooding to the site is considered to be low. Guidance within the SFRA advises that the control structures on the canal are designed to keep water levels in the watercourse with a freeboard of 300mm. In the event of 'abnormal' conditions, for example, extreme storm events; structural failure or blockage; or vandalism, there are storm weirs and emergency sluices which become operable in order to reduce the risk of overtopping or breaching. This risk is further reduced through regular inspections of the canal structures. Nonetheless there does remain a residual risk of flooding to the site from this source, if the flood reduction mechanisms or systems fail. Within the Level 1 SFRA, the Council Drainage Engineers have identified that the vicinity of Withybed Lane (which crosses the canal 150 m south of the site) is an 'Area of Concern', potentially because of culverts known to have capacity or structural problems. The Canal and River Trust is a Statutory Consultee and should be consulted during pre-application stage.

Mapping within the Level 2 SFRA suggests that the eastern part of the site may be susceptible to groundwater flooding. The risk of groundwater flooding to the site could be confirmed through a more detailed site-specific investigation into ground water conditions on site. Appropriate mitigation measures have been incorporated into the development design to ensure the risk of flooding from this source is reduced to an acceptable level.

According to Environment Agency mapping the site is identified as being at a very low risk of surface water flooding, with the exception of a very small area close to the canal on the eastern part of the site. Level 2 SFRA mapping the site is not identified as being at risk of flooding from off-site surface water flooding.

Ground Conditions

A Geo-Environmental Report has been carried out by RPS. Based on the neighbouring land uses it can be considered that the site is situated in a moderately sensitive environmental setting. Nearby residential properties, the Canal and groundwater represent sensitive receptors.

The report indicates that there is the potential for localised shallow ground contamination associated with infilled ground/made ground and other historical land use features including the former wharf and farm buildings. There is a limited potential for ground gas associated with infilled ground and the off-site landfills to impact the site.

Prior to development of the site it would be necessary to undertake a Phase 1 Geo-Environmental Assessment and a basic Phase 2 Site Investigation incorporating soil and analysis and ground gas monitoring to assess the potential risk associated with ground contamination and ground gas. These documents would be required by the local planning authority in support of a planning application. The site investigation could be combined with the geotechnical ground investigation.

Utilities

A Utilities Report has been carried out by RPS Engineering.

The Distribution Network Operator in this area is Western Power Distribution and it has been confirmed that there are existing services on and around the development site.

The communications provider in this area is BT Openreach and it has been confirmed that BT Openreach has infrastructure in Callow Hill Road. BT drawings also indicate that there are live services on the site to connect a telecoms mast.

The water network supplier in this area is Severn Trent Water and it has been confirmed that Seven Trent Water has a 6" main in Callow Hill Road.

Foul water drainage can be provided through connections to the adopted sewers either in Callow Hill Road or Glebe Road to the south of the site.

The main network transporter for gas in the area is National Grid. National Grid has both medium and low pressure mains in Callow Hill Road. The medium pressure main runs immediately adjacent to the site. The low pressure mains are located south of the development site on the other side of the canal bridge. National Grid has provided a point of connection onto the medium pressure main.

Initial enquiries have indicated that all necessary services and utilities are available in close proximity to the site.

Green Belt

The site is currently within the West Midlands Green Belt and therefore development is currently restricted to that which is not inappropriate within the Green Belt. The adoption of the Bromsgrove District Plan makes it clear that a full Green Belt Review will be required as a part of the Local Plan Review, which seeks to identify parcels of land that could be released for development to help Bromsgrove and its neighbouring authorities meet their housing needs.

When identifying appropriate parcels for release from the Green Belt it is essential to locate parcels with robust and easily identifiable boundaries and which no longer contribute to the purposes of the Green Belt.

The five purposes of the Green Belt are contained within paragraph 80 of the NPPF and are:

- To check 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.

A brief assessment of the site against the five purposes of the Green Belt reveals that-

- The site is not adjacent to a large built up area and given the existing development fronting Callow Hill Road to the west of the site, it would not result in ribbon development, therefore it does not have a significant role in checking the sprawl of large built-up areas.
- The closest neighbouring settlement to the site is Barnt Green, some 1.5km north-west of the site. There would be no likelihood of the settlements merging because of the significant physical barrier created by the M42.
- The site has already been affected by the encroachment from previous development, including the telecommunications mast, there are significant boundaries to all sides (M42, Callow Hill Road and the canal) and the site performs no current leisure or recreation functions therefore it is not significantly assisting in the safeguarding of the countryside from encroachment.
- The nearest Listed Building to the site is Lane House, some 350m north-east, due to the presence of the raised M42 to the north there is no intervisibility between the site and the Listed Building, therefore the site does not play a significant role in protecting the setting of historic towns;
- The site, as with all Green Belt land does assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Overall therefore, it is presented that the site does not provide a significant contribution to the Green Belt as many of the principles of the Green Belt have already been compromised.

4 Masterplan

Opportunities and Constraints

- The site is encompassed by mature tree planting along the M42 corridor, around the Canal and along the boundaries of existing properties adjacent to the boundary. This gives the site strong enclosure and defined boundaries.
- Higher ground toward the centre of the site allows longer distance views to the south and south-west. The site will require tree belt planting along the 'ridge' to break up the development area and reinforce planting on site.
- The mature woodland trees delineate the canal frontage whilst the site is at a higher level away from the canal side itself, particularly towards the east where the canal was cut into the slope. This creates a positive setting for housing, without the opportunity for direct frontage onto the canal, hence retaining the character of the canal corridor itself.
- The canal has a towpath which is a pedestrian right of way and the proposals include an indicative footbridge to create a pedestrian link from the site to the towpath and wider footpath network.
- There is an area of grassland towards the south-east corner of the site, which for ecological reasons, will be retained within the open space provision and provide a wildlife habitat.
- Existing cottages along Callow Hill Road give a strong sense of enclosure to the road frontage and should be continued north of the site access, without compromising the visibility splay from the proposed access point.
- There is an historic narrow canal bridge crossing.
- There are existing agricultural buildings and hard standing on the site which will be demolished and removed with any development.
- There is a telecommunications mast on the northern boundary with access required to the mast for maintenance. The lease agreement for the mast provides for its removal in the event of planning consent for development of the site being issued.
- The site will require servicing for foul water and sewerage, and utility connections. A small electricity sub-station is required on site to service the development.
- There is an existing access track to Waterside Cottage via a separate vehicular access on Callow Road that lies within the site. This access will be retained and will not be used for vehicular access into the development.



Opportunities & Constraints Plan

Concept

- The area proposed for housing development lies along the northern edge of the site, with wide new tree belts to largely screen or 'break up' the development from longer distance views from the south and provide new foraging routes for wildlife. The proposal is for approximately 55 dwellings of various mix and type.
- Lower density housing 'pockets' are proposed amongst new tree planting along the northern boundary, with dwellings either side on or backing onto the northern boundary and M42 woodland corridor.
- Tree belts will be punctuated by private drives / shared accesses to access the lower density parcels. This central belt of trees running east to west would be predominantly in private ownership between back gardens or as part of the highway verge and side gardens.
- Open space to the south would incorporate tree planting, a large balancing basin to attenuate surface water run-off during heavy rainfall, and the retained grassland to the south-east, connected by this open space green link. This green link also connects through to the surrounding woodlands and tree belts that surround the site.
- The woodland to the west alongside the canal is overlooked by frontage within the development at a higher level to the canal within the site.
- The units fronting Callow Hill Road would be served from the rear to enable the units to front the road and reflect the character of the road and the setback of the existing cottages to the south.
- A footbridge can be linked to the development area and open space with a path, connecting the development to the canal towpath. Scoping works are currently being undertaken by consultants.
- All the surrounding properties are screened from the development by proposed and reinforced tree planting belts.
- Some streets are aligned north to south to take advantage of the longer distance views over the village, whilst others define perimeter blocks and allow overlooking of open space to create a positive edge to the development. All public open space is overlooked directly by frontage.
- The telecommunications mast located to the North West of the site will be removed once development has begun.



Concept Plan

Masterplan commentary

- The proposed masterplan indicates a total of 55 new dwellings which would help towards the five year housing supply and be of an appropriate density for Alvechurch;
- The layout proposed reflects the character of existing properties in Alvechurch and the surrounding area;
- The masterplan shows a mix of housing type to suit a variety of needs;
- The proposed development incorporates a significant amount of tree planting, with a large tree belt towards the north of the site to retain the site's character and maintain the green corridor through the site;
- While there is some canal side development, the proposed dwellings are largely located away from the canal to avoid visual harm;
- Where housing is adjacent to the canal, there is a large amount of existing tree screening;
- Existing residential properties have been considered in the design of the masterplan and large areas of open space have been located directly adjacent to those existing properties to limit the impact of the development;
- The masterplan provides large areas which will retain the ecological value of the site and help to provide wildlife habitats;
- A large balancing basin has been incorporated to attenuate surface water run-off during periods of heavy rain. This basin also provides a pleasing outlook for existing residents;
- The location of areas of public open space is such that they will benefit from natural surveillance due to the layout of the site and the orientation of the dwellings;
- There is one main access to the site from Callow Hill Road. This access will not impact on the existing properties along Callow Hill Road;
- The layout of the masterplan shows legible routes through the site with appropriate vehicular and pedestrian access;
- The services for the site are located so as to have limited impact on existing and future residents.



Masterplan

Creating new homes **Land East of Callow Hill Road, Alvechurch:** Site Delivery November 2017

5 Conclusions

This document demonstrates the suitability of land to the east of Callow Hill Road for residential development. The Masterplan has been designed to be sensitive to the local area and take advantage of the site's benefits to provide a high quality, sustainable development.

The site is currently within the Green Belt however this document is prepared in anticipation of a Green Belt review as part of the emerging Local Plan Review. Through the process of reviewing the Green Belt boundaries Bromsgrove Council will need to identify and allocate suitable sites on the edge of existing settlements for residential development. The site would be appropriate for release from the Green Belt as it no longer fulfils the purposes of the Green Belt due to the encroachment of built development, and the significant and robust boundaries to all sides. This document demonstrates that the site at Callow Hill Road would provide a suitable residential extension to Alvechurch with links to local services.

The development of the site would make a sizable contribution to the Bromsgrove or Redditch cross-boundary housing supply and create a high quality development that would provide a range of sizes and types of market and affordable homes.

The site has good transport links to the wider area and would provide an additional pedestrian crossing over the Worcester & Birmingham Canal. The development would provide public open space and areas to support biodiversity, helping to support an attractive and sustainable environment.

The document acts as a starting point for working with the local authority and community to refine the proposal further and deliver a successful development for the future.

Creating new homes

Land East of Callow Hill Road, Alvechurch

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APPENDIX 2 – PRE-SUBMISSION RPS REPRESENTATION



Date: 10th November 2017

Neighbourhood Plan Representation

Land to the east of Callow Hill Road, Alvechurch

Introduction

This representation has been prepared by RPS Planning and Development on behalf of landowners in relation to the Draft Alvechurch Neighbourhood Plan 2011-2030 which is currently undergoing a 6 week public consultation during October and November 2017.

The area of land in question is located east of Callow Hill Road and is currently outside the development boundary identified within the Neighbourhood Plan. It is seen as a suitable and sustainable residential site for future allocation at Alvechurch to accommodate the housing target set out by Bromsgrove District Council.

A Site Delivery Document has been prepared by RPS Planning and Development, which provides further detail of the site and which demonstrates its suitability for residential development.

Bromsgrove District Plan 2011 – 2030

The Bromsgrove District Plan was adopted January 2017, and has identified a required target of 7,000 new homes by 2030. The District Council have identified that approximately 4,700 homes can be delivered without having to develop in the Green Belt. This means a further 2,300 homes need to be identified to meet the target, leading to the need to potentially release Green Belt land for future development. Policy BDP3 of the District Plan identifies the need for a Green Belt Review to be undertaken to identify land for housing before 2023.

Draft Alvechurch Neighbourhood Plan, September 2017

The designated Neighbourhood Plan area was formally agreed in January 2013. Since then the Neighbourhood Plan Steering Group has set out their vision for Alvechurch Parish. A draft Neighbourhood Plan has now been produced for the period up to 2030. The plan and all associated documents are currently undergoing a 6 week period of consultation prior to the submission to Bromsgrove District.



The Neighbourhood Plan currently does not look at any sites outside the settlement boundary, within the Green Belt. The Plan indicates that once Bromsgrove Council have undertaken their Local Plan review, including a Green Belt review, they may have to identify development sites.

During the consultation period when producing the Neighbourhood Plan a survey was undertaken with the residents of Alvechurch to establish the preferred areas for future development. There is an understanding that Alvechurch is constrained by surrounding Green Belt land which is the only option for future development in the area. The majority of local residents voted that it would be preferred if sites released from the Green Belt for development were situated immediately adjacent to existing settlements. The land to the east of Callow Hill Road is located adjacent to Alvechurch, therefore conforming to the preferred option.

POLICY 2: Locations for New Housing Development

The Neighbourhood Plan Policy 2: Locations for New Housing Development sets out the following criteria for new development within Alvechurch. As described above the subject site is outside the settlement boundary and as such these policies will not apply. In the event that additional sites are needed to be identified this policy will set criteria for such sites, in addition to being located adjacent to the settlement boundary. The criteria are

- a. It is located within the designated Alvechurch Village settlement boundary

Land East of Callow Hill Road, is located adjacent to the settlement boundary, however Alvechurch currently has no potential development sites within the boundary. There were two sites within the settlement boundary with planning permission for residential use, these have now been completed providing 52 new dwellings.

Any future review of the Green Belt would necessitate a similar settlement boundary review.

- b. The redevelopment of brownfield land will be prioritised

The site is unmanaged and of poor quality which is considered to have low or no value to the Green Belt. It is accepted all previously developed land options would need to be considered ahead of Green Belt releases.



- c. It would not lead to the loss of open space, community asset or employment uses, which are desirable to maintain

The site does not consist of open space, community asset or employment use. The development would in fact improve what is currently a disused area, and will also provide improved open space.

- d. Development should not extend existing ribbon development and should contain the spread of the village, by promoting infilling up to its natural physical boundaries

Ribbon development is a line of buildings served by individual accesses extending along a road, therefore the development would not result in ribbon development. The site has strong defining boundaries with the placement of development within the area that is naturally and physically bound.

- e. Criteria for defining development boundaries: boundaries should follow clearly defined physical features such as: walls, fences, hedgerows, roads, streams, and water courses in general. However, some development boundaries may follow along the rear of built development rather than physical features to prevent inappropriate back land development, for instances where dwellings have large back gardens

The site has very strong physical boundaries, the M42 runs adjacent to the north, the Worcester and Birmingham canal also runs adjacent to the east and south, with Callow Hill Road located to the west. Trees and hedgerows are due to be kept and enhanced along the boundary of the main site.

- f. It would not have an adverse impact on the local landscape, natural environment or heritage assets

Trees surrounding the site are due to be kept on the masterplan, as well as improvements to the canal area by providing a landscape buffer zone. With regards to Listed Buildings within the area, (Two Grade II*, and nineteen Grade II listed) due to the distance of the site and intervening built development, the Listed Buildings and their settings are not expected to be affected. Existing and additional trees will mitigate any potential negative impacts.



- g. The scale, height and form of the proposed development will fit unobtrusively with existing buildings and spacing between buildings would respect the character of the street scene

Existing cottages along Callow Hill Road give a strong sense of enclosure to the road frontage and will be continued within the development to reflect the character of the road. Future applications on the site for residential dwellings will take into consideration further policies and guidance from the Bromsgrove District Plan, including the Alvechurch Village Design Statement.

- h. It would not adversely impact on the existing residential amenity of adjoining occupiers

Neighbouring residents have been taken into consideration with regards to the placement of units. A large area of open space will separate the existing cottages and the single dwelling to the West of the site. Mature tree planting will be retained which surrounds the properties as well as additional trees so the development will not negatively impact the neighbouring properties.

- i. To meet sustainable criteria new development where possible should be located within 15 minutes and no more than a 20 minutes' comfortable walk of the Village centre at a comfortable pace

The site is approximately a 12 minute walk to the village square, via the public footpath which includes shops, restaurants, doctors, and public houses. A short walk along the footpath also leads you to bus stops for both routes 182 and 146. The first and middle school is also located close to the bus stops.

- j. The NP should be used as a whole

As a development, the design has taken into account the surrounding area as well as improving open space for current residents and new residents to enjoy. The scheme will also support biodiversity in the area which will support an attractive and sustainable environment. Additional Policies relevant to the development are addressed through the proposed design:

- Policy 4 – Affordable housing on rural exception sites in the Green Belt
- Policy 5 – Housing design principles
- Policy 6 – Sustainable development through design
- Policy 7 – Providing a mix of housing types and sizes
- Policy 12 – Protecting landscape and open views
- Policy 13 – Access to the countryside
- Policy 14 – Protection and enhancement of the natural environment
- Policy 17 – Improvement to and protection of open spaces



Summary

As detailed above, the site itself would conform to the Neighbourhood Plan and Policy 2 for defining development sites. We believe that in any future review of Green Belt, settlement boundaries, and site identification, the site would meet these criteria.

The provision of a potential suitable site within the Alvechurch Neighbourhood Plan will aid the Local Plan Review that is due to be undertaken before 2023.

For further, detailed information regarding the masterplan proposal for the site, see Appendix 1: Site Promotion Document.