



CATSHILL AND NORTH MARLBROOK PARISH NEIGHBOURHOOD PLAN – SUMMARY OF REGULATION 16 REPRESENTATIONS

REPRESENTATION	SECTION / POLICY / PARAGRAPH	COMMENT (SUMMARISED OR EXTRACT)
CNMNP01 – Severn Trent	Policy ENV4	<p>Severn Trent is supportive of this policy, in particular the comment that states ‘unless a proposal can demonstrate that the contribution of the scheme would outweigh the harm to Local Green Space’ as we believe this provide opportunity where SuDS schemes may be required to utilise Local Green Spaces.</p> <p>We would therefore recommend that the following point is added to Policy ENV4:</p> <ul style="list-style-type: none">• Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.
	Policy ENV8	<p>Severn Trent is supportive of this policy, however we would encourage you to go further in sustainable design principles to include water efficiency. Whilst the protection of sources of water is important it is also important that new development considers how water will be utilised within the home. By reducing the amount of water utilised development can reduce its impact on the sewerage network, reduce the quantity of water needing treatment for consumption and reduce the quantity of wastewater requiring treatment.</p> <p>To ensure that the design element is considered from the outset of design it is recommended that the policy specifies water efficiency. Some example wording is provided below to assist with implementation of our request:</p> <ul style="list-style-type: none">• All development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.

		<p>The implementation of water re-use technology could also help to reduce the need for water, providing additional benefits to both water supply resilience and Sewerage resilience.</p> <ul style="list-style-type: none"> All Development should demonstrate that unless not reasonably practicable the site designs have included water re-use measures
	Policy ENV9	<p>Severn Trent is supportive of this policy regarding the provision of SuDS within new developments. We would however encourage specific reference to the drainage hierarchy. The management of surface water is a key element in delivering new development without increasing flood risk on or off site.</p> <p>Planning Practice Guidance Paragraph 80 provides a priority system that new development should follow to ensure that surface water is discharged to a sustainable outfall. Severn Trent would recommend that this is highlighted within the design policy. Some example wording is provided below to assist in the interpretation of this request:</p> <ul style="list-style-type: none"> All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.
	Policy ENV10	Severn Trent is supportive of this policy regarding requirement for permeable paving.
CNMNP02 – The Coal Authority	General	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.
CNMNP03 – Natural England	General	<p>Thank you for your consultation on the above dated 25 February 2021.</p> <p>Natural England does not have any specific comments on the Catshill and North Marlbrook Parish Neighbourhood Plan.</p>
CNMNP04 – Dodford with Grafton Parish Council	General	At the Dodford with Grafton Parish Council meeting last night, the representation period for the Catshill and North Marlbrook Parish Neighbourhood Plan notified by Bromsgrove District Council was discussed.

		The Parish Council did not wish to make any representations but I was asked to send an email congratulating your Parish Council on your excellent Neighbourhood Parish Plan.
CNMNP05 – Lickey and Blackwell Parish Council	General	Thank you for consulting Lickey and Blackwell Parish Council. We discussed this at our March meeting and I have been instructed by the Parish Council to offer their congratulations on an excellent job.
CNMNP06 – Mr Easthill	Para 8.5.4 (Fig.6)	With regard to page 37 of the Catshill and North Marlbrook Neighbourhood plan of January 2021. On page 37 the site reference 22 is in reality split between two landlords; the Holt Estate and Strawford or their successors.
CNMNP07 – Worcestershire County Council	General	Highways - all development should adhere to the guidelines set out in the Worcestershire Streetscape Design Guide.
	Section 10.8 – Climate Change and Water Management	Climate change mitigation and adaptation are central to the National Planning Policy Framework (NPPF). The UK Climate Change Act 2008 sets legally binding targets for the UK to reduce carbon emissions to net zero by 2050. New developments will be around for a considerable number of years, it is important that they remain fit for purpose over their lifetime as the climate changes. We are encouraged to see the inclusion of climate change within the NP (10.8 – Climate Change and Water Management). We are fully supportive of all adaptation measures listed in 10.8.2, which align with Bromsgrove District Plan (BDP) Policy 22 – Climate Change.
	Policy H3	<p>We are supportive of Policy H3; the BDP SO10 encourages new developments to be low or zero carbon, with BDP22 (Climate Change) calling for ‘developments to incorporate zero or low carbon energy generation technologies’. However, there could be more stretching targets proposed within the NP to achieve energy efficiency and further support installation of renewable energy to achieve low/zero carbon development.</p> <p>It would be encouraging to see recognition of the issue of fuel poverty within the Neighbourhood Plan. The latest figures show that 10% of households in Worcestershire are considered to be fuel poor, meaning they have high energy costs but a low household income.</p>

	General	There is limited reference to supporting the inclusion of electric vehicle chargepoints in new developments in the NP. BDP16.3 states that <i>'The Council will support the use of low emission vehicles including electric cars through encouraging the provision of charging points in new developments'</i> .
	Policy ENV8	The NP could consider improvements to water efficiency in new homes and non-residential developments over and above building regulations, including the provision of water butts (residential).
	General	The NP makes no reference to waste, supporting the segregation of waste for recycling, or ensuring infrastructure and access for waste collections. The plan could consider options for onsite composting for new homes, including provision of compost bins for all new homes. The plan could consider inclusion of provision of allotment and growing space in suitable locations.
CNMNP08 – Historic England	General	<p>Thank you for the invitation to comment on the Submission Neighbourhood Plan.</p> <p>Our previous comments on the Regulation 14 Plan remain entirely relevant that is: “Historic England is supportive of both the Vision and objectives set out in the Plan and consider that it takes a suitably proportionate approach to the historic environment of the Parish. The use of Design Codes will no doubt prove invaluable as a context and guide for future development, the approach to which along with the desire to conserve the distinctive character of Catshill and North Marlbrook including the focus upon green space and green infrastructure is highly commendable”.</p> <p>Beyond those observations we have no further substantive comments to make.</p>
APNP09 – Eldnar Ltd (on behalf of WCC)	General	<p>WCC has previously made representations through Place Partnership (dated 2nd November 2021, ref: P/H Div/0029/20) in relation to two landholdings that form part of the WCC Bournheath Smallholdings Estate.</p> <p>Sites within the Catshill and North Marlbrook NP, such as those within the WCC Bournheath Smallholdings Estate, are therefore key in addressing both the district’s supply and delivery</p>

		shortfalls. The sites have been submitted as part of the Bromsgrove District Council (BDC) Call for Sites as part of the preparation of the emerging Local Plan.
	Policy H1	<p>We find that NP Policy H1 is positive and proactive in essentially mirroring the approach within both the ALP, emerging Local Plan and the National Planning Policy Framework 2019.</p> <p>It allows for the principle of major development (ten or more houses) on land which BDC has released from the Green Belt. We are supportive of this approach as it allows BDC to decide where Green Belt land would be best released in order to best distribute and locate housing across the district. It also acknowledges that the area within the NP will be required to accommodate housing during the plan period which is key given its role as a Large Settlement within the district.</p>
	General – basic conditions	The NP is required to meet the “basic conditions” set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. Based upon the approach which now seeks to allow BDP to decide what land is released from Green Belt, and thus allow development on such sites in principle within the NP, it is considered that the NP now has regard for national policy, contributes to the achievement of sustainable development and is in general conformity with the strategic policies contained in the development plan for the area of the authority.
CNMNP10 – Avison Young on behalf of National Grid	General	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p>
CNMNP11 – RPS on behalf of Gleeson Strategic Land	General	Despite supporting the principle of preparing an NDP for the Catshill & North Marlbrook Parish area (the Parish) GSL has concerns with various policies and other related aspects of the published documents. These concerns are exacerbated by section 6.7 of the Consultation

		<p>Statement, published as part of the Regulation 16 Submission Consultation, which contains a selective list of supportive quotes which are presented as typical responses to the Regulation 14 consultation.</p> <p>RPS must express our concerns in respect of various aspects of this submission version of the CNMNDP. These concerns are that aspects of the CNMNDP do not meet the 'basic conditions' as set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).</p> <p>In particular, RPS consider the CNMNDP does not meet the following:</p> <ul style="list-style-type: none"> (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order, (d) the making of the order contributes to the achievement of sustainable development, (e) the making of the order 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).
	Section 3, Chapter 8	<p>As set out at paragraph 3.6 of our Regulation 14 Response earlier versions of the CNMNDP considered potential site allocations for housing development, including Land to the North of Braces Lane. However, as noted at paragraph 3.7 of our Regulation 14 Response CNMPC have now reined back from doing so.</p> <p>Policy BDP3.1 of the adopted BDP (2017) clearly establishes the need for changes to the Green Belt which, as per paragraph 136 of the NPPF, allows for detailed amendments to the boundaries of the Green Belt to be made through non-strategic policies, including neighbourhood plans. As such RPS contend that it is within the remit of the CNMNDP to make detailed changes to Green Belt boundaries and doing so would be entirely in accordance with the positive and proactive approach to meeting housing need envisaged by the NPPF.</p>
	Policy H1	<p>Criterion 1 of Policy H1 as worded seeks to prevent development on the basis of future work to be undertaken outside the NDP process. As set out in paragraphs 4.6 and 4.7 of our Regulation 14 Response this cannot be applied independently to specific proposals on sites located within the Green Belt and the criterion does not stand on its own. It also seeks to establish an additional level of protection to Green Belt land above the protection afforded by</p>

		<p>the NPPF. This is not justified, nor is it necessary.</p> <p>Criterion 2 is overly restrictive as worded as it does not allow for the redevelopment / reuse of previously developed land within the Green Belt, despite this being acceptable in certain circumstances as defined by paragraph 145 of the NPPF. While the Consultation Statement correctly notes that the CNMNDP cannot do this, that would be the effect of the current policy wording. Accordingly, RPS recommend that this is deleted.</p>
	Policy H2	<p>RPS welcome the changes that have been made to this policy. However, the proposed revised wording continues to be overly prescriptive by requiring that schemes should provide the four criteria set out at a) to d). This would potentially preclude developments that make a contribution to some, but not all, of these criteria and in particular is likely to introduce additional barriers to smaller developments that do not have the necessary scale to address all of these criteria within the same scheme. RPS suggest that amending the final sentence of the first section of the policy to: “In particular, schemes that provide some or all of the following will be supported”</p>
	Policy H3	<p>RPS note that the proposed wording of this policy has been revised from the Regulation 14 version of the CNMNDP and the reference within the Consultation Statement that the Design Guide is intended to have an ‘informative role’. However, RPS are concerned that the Design Guide as drafted is not as envisaged by the planning practice guidance.</p> <p>The Design Guide is a particularly lengthy document, which is overly prescriptive setting various requirements for developments. As such rather than acting as a concise and positive document that highlights key design issues and presents possible solutions the Design Guide prescribes specific approaches and does not recognise that there may be appropriate alternative solutions not envisaged by the authors.</p>
	Policy ENV4	<p>RPS disputes the legitimacy and credibility of the evidence provided by CNMPC for the designation of Area 2 as a Local Green Space in the CNMNDP.</p> <p>In the Consultation Statement CNMPC state that it would be unlikely to inhibit development of adjacent land because it has the potential to be incorporated into the open space / recreational</p>

		<p>area for a scheme. RPS dispute this conclusion as the designation of this land in its entirety would potentially fetter development of land to the north by preventing access from Birmingham Road as proposed in Appendix A of our Regulation 14 Representations. This would be contrary to basic condition test 8b as it would prevent sustainable development.</p> <p>While RPS dispute the designation of any part of this area as a Local Green Space, should it be considered that this is justified the boundary should be revised to ensure that a suitable access from Birmingham Road can be provided and so not inhibit the development of the land to the north.</p>
CNMNP12 – Turley on behalf of Redrow Homes	General	We are concerned that the assessment of sites, including Redrow’s site at Washingstocks Farm (‘Site 2’), is not sound and should not therefore be relied upon in informing the BDC Local Plan Review.
	Section 3, Chapter 8	Section 3 of the NP introduces site specific assessments for meeting an identified housing need for the NP area. We reserve the right to comment on the appropriate level of growth to be attributed to the NP area through the BDC Local Plan review process.
	General	<p>We do not consider that the additional grounds for downgrading Site 2 as identified within Appendix 7 and 10 of the evidence base are sound and they conflict with the findings of the GBPA which underpins the Green Belt review which will inform the preparation of the BDC Local Plan Review.</p> <p>We consider that the site assessment for Site 2 should be at least graded as amber, consistent with the Aecom assessment. It is critical that all sites with potential for release from the Green Belt are soundly assessed to inform the BDC Local Plan review and we contend that Site 2 provides the most sustainable and deliverable option to accommodate housing needs within Catshill.</p>
CNMNP13 – Avison Young on behalf of St Philips	General	Through its engagement with the Plan (specifically in its response to the Regulation 14 consultation) St Philips has raised a number of concerns around (i) the extent to which the Plan contributes to sustainable development; (ii) the extent to which the Plan complies with national planning policy; and (iii) the proposed designation of part of its land at Stourbridge Road as a

		Local Green Space ('LGS') and the evidence base to support this.
	Policy ENV4 and Appendix 12	<p>The Reg. 14 pre-submission version of the Plan proposed the designation of a significant part of St Philips' land at Stourbridge Road as Local Green Space. The key points arising from our client's response to the Reg.14 consultation can be summarised as follows:</p> <ul style="list-style-type: none"> i) the proposed designation of part of the land at Stourbridge Road as Local Green Space would significantly constrain the delivery of the site which, by the Parish Council's own admission, appears to be one of the most sustainable and suitable options in the Plan area. ii) the proposed designation is un-evidenced and not justified and is informed by an erroneous assessment that reaches conclusions contrary to other parts of the Parish Council's evidence base. iii) With the above in mind, the Plan fails to meet the first and fourth basic condition required to enable the Plan to be 'made' (as set out in the Town and Country Planning Act 1990). On this basis, the designation of the site as Local Green Space is wholly inappropriate and should be removed accordingly.
	Section 3, Chapter 8	<p>It is not clear what purpose the inclusion of commentary on housing numbers and possible housing sites seeks to achieve, given there is no policy in the Plan that either: a) sets a housing target for the Plan area; or b) allocates sites for development.</p> <p>The reason for drawing attention to these matters is because they confirm that the eventual housing target that the District Council selects is likely to increase from figures that were referred to in initial consultation documents and are repeated in the AECOM HNA and the Neighbourhood Plan, meaning that such references are redundant.</p>
	Policy H1	<p>Amongst other things, it says that residential development will only be permitted on sites which are released from the Green Belt by the District or are previously developed non-Green Belt sites. Whilst the general presumption against development in the Green Belt is broadly consistent with national policy, the Plan doesn't include a reference to the Very Special Circumstances test (as outlined in paragraphs 143 and 144 of the NPPF) that would apply to proposals for development in the Green Belt.</p>

		As drafted, there is a risk that Policy H1 would impose a blanket ban on residential development on greenfield land in the Green Belt. Although the NPPF sets a very high bar for allowing such development, it nevertheless does provide a mechanism where such development might be allowed. We therefore recommend that the policy wording be revised to include reference to the Very Special Circumstances test, in order to be consistent with the NPPF.
CNMNP14 – Savills on behalf of landowner	Para 6.3	This paragraph acknowledges that the modest gap between Bromsgrove and Catshill has become vulnerable because of recent and planned developments to the northern and western edges of Bromsgrove. We consider that the risk of coalescence between the southern part of Catshill and Bromsgrove lends support to alternative parts of Catshill being considered more favourably for development.
	Para 6.6	We note that principle 3 refers to avoiding over reliance on a single large site for housing purposes. Whilst it is sensible to allocate a range of sites for development, large sites should not be dismissed in such a way. Comprehensive development of a large site can provide “economies of scale” in order to provide robust contributions to local services and support the viability of shops and services nearby through the location of a critical mass of new residents.
	Para 8.2.7	We note that reference is made to the 379 homes per year figure derived from review of the standard methodology and its implications for Bromsgrove. Consideration will also need to be given to the recently revised version 2 of this standard methodology which requires a 35% uplift for large cities such as Birmingham and Wolverhampton. It has already been demonstrated through currently adopted and emerging plans that these locations cannot accommodate additional growth within their Local Authority boundaries.
	Para 8.5.1	We support the statement made at paragraph 8.5.1 that: “... Respondents also favoured housing being spread across a number of small sites across the Parish. Unfortunately, such an approach would limit developer contributions and significantly reduce provision of affordable homes and also conflict with residents’ desires for improvements to infrastructure and services.”
	Para 8.5.3	We have concerns with the fact that as identified in paragraph 8.5.3 that the AECOM produced work for the evidence base did not take into account Green Belt or impact on traffic. We agree

		with AECOM's stance that Green Belt release must be considered by the District Council through their assessments. However we request clarity on why traffic impacts were not assessed during the site selection process. Until both of these pieces of work are undertaken we question the validity of the evidence base findings that back up the site assessment process.
	Section 8.9	We support the principle of good quality design contributing to the overall sustainability of development. However we disagree that the best way to achieve this is always through the use of a design code. It should be made clear that a design code is in place to provide assistance on what is good design in a wide context, but cannot provide clarity on what is considered acceptable at a site specific scale. Even though the Design code is at a Parish level, this is not fine grain or detailed enough to provide site specific details. It should be acknowledged that matters of detail, of which design is one, should be considered at the planning application stage and more specifically through a reserved matters application.
	Policy H2	<p>This policy should be amended to include acknowledgement that the mix of dwelling types is something that should be considered on a site by site basis, rather than a blanket mix being imposed across all development.</p> <p>We object to there being no requirement for the provision of three bedroom homes. There is no rationale to require over two thirds of homes to be two and four bed, but not require three bedroom homes.</p> <p>AECOM's report also advises to promote the delivery of bungalows and apartments to cater for an elderly population, We disagree that bungalows are only way to deliver accommodation for older people. This could include the provision of maisonette dwellings to enable delivery of first floor and ground floor accessible dwellings, whilst ensuring suitable density is maintained. We consider that any requirement to provide bungalows is unduly restrictive and onerous unless there is evidence that demonstrates at a site specific level that the provision of this type of dwellings is appropriate.</p>
	Policy ENV2	In principle we agree with the Plan position on requiring comprehensive landscaping proposals. However it is not clear from the wording of the policy at which stage this would be required. Such detailed matters should not be required to be considered at the Outline planning application

		stage. Matters such as landscaping are site for site specific consideration and should not be unduly influenced through a design code.
	Policy ENV3	We object to the requirement to connect to the ecological sites identified. Firstly it is unclear what ecological evidence base has been produced to support the designation of these sites. Secondly, we question the ability for every development site across the Parish to suitably connect to all of the sites listed.
	Policy ENV4	We note that a range of Local Green Spaces are identified by the Neighbourhood Plan. Policy ENV4 states that development must not detract from the openness or special character of a Local Green Space. We request clarification on what is meant by this and the requirements that would need to be met in any future planning applications to be determined in accordance with the Plan when made.
	Policy ENV7	We consider that the designation of significant views as highlighted on the Policies Map should be clear that it does not sterilise development at locations across the Parish. There should be a balancing exercise during the Plan production process between the successful and viable delivery of development sites and the designation of significant view status and its implications for development in that location.
	Policy ENV8	Whilst we support in principle the introduction of measures to increase sustainability in developments, we consider that placing a requirement to achieve zero or very low carbon emissions is potentially onerous, if policy is not worded to reflect building regulations requirements.
	Para 12.3	We agree with the position set out at paragraph 12.3 which states that a full review of the Neighbourhood Plan will be undertaken every 5 years (or sooner if circumstances warrant). We consider it useful to set out the purpose of these reviews, but that the triggers for such a review should be explicitly stated within a policy in the plan.