

**REPRESENTATIONS TO THE ALVECHURCH
NEIGHBOURHOOD PARISH DEVELOPMENT
PLAN:**

ON BEHALF OF

JAMES CHRISTOPHER HOMES

8TH NOVEMBER 2017

REF 15.073



Cerda Planning have been instructed by James Christopher Homes to submit representations to the Alvechurch Parish Neighbourhood Plan.

The following comments are made in relation to the draft Plan and its appendices.

Cerda Planning in general, welcomes the drafting of a neighbourhood development plan for Alvechurch. In line with the Localism Act of 2011, the Neighbourhood Planning process allows local communities the opportunity to “plan” for themselves. The NPPF advocates such an approach whereby the Neighbourhood Plan can develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development and that reflect the needs and priorities of communities providing they are planned in a positive manner to support local development which shapes and directs development in their area.

The preparation of a Neighbourhood Plan is consistent with the first Core Planning Principle of the NPPF which states that “Planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Paragraph 58 of the Framework requires that Neighbourhood Plans should contain robust and comprehensive policies...based on stated objectives for the future of the area and understanding and evaluation of its defining characteristics...”

The dedicated chapter on Neighbourhood Plans states that Neighbourhood Planning gives communities direct power to develop a shared vision and deliver the sustainable development they need. It emphasises that the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area and that Neighbourhood Plans should be in general conformity with the strategic policies of the Local Plan. It specifically advises at paragraph 184 that “Neighbourhood Plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”

It is therefore clear that residents of Alvechurch have accepted that there is a need to allow further development in the village in order to secure the long term survival of the community, whilst retaining its unique and distinctive character.

Cerda Planning are generally supportive of the Alvechurch Parish Neighbourhood Plan in particular the understanding that a Green Belt review will be required in order to support future residential development. Larger settlements such as Alvechurch will be expected to accommodate additional development and therefore it is important that Green Belt land is properly assessed and where appropriate released in order to facilitate sustainable development on the edge of Alvechurch. However it is concerning that such a review is outlined as a long term objective of the Plan. Given the current housing requirement and that

Bromsgrove District Council is expected to assist in meeting unmet housing need arising from surrounding authorities then this approach can be seen as limited. Given the NPPF's approach to proactive planning it is suggested that this Green Belt review and subsequent review of Alvechurch settlement boundary is progressed as an immediate objective of the Neighbourhood Parish Plan. At the very least sustainably located brownfield sites outside of the settlement boundary should be given equal weight and support to those sites within the settlement boundary. The NPPF outlines that sustainable development is the golden thread running throughout planning and as such sites that comprise sustainable development should be approved without delay, therefore sustainable brownfield redevelopment should be prioritised inside and outside of the settlement boundary.

The Plan acknowledges that there is a need in the village for growth and investment and highlights the positives for the local area that development can deliver. However despite the acknowledgement that the Neighbourhood Plan will support sustainable development Cerda Planning are concerned that the Draft Plan includes NO proposed allocated sites. Given that the Bromsgrove District Plan identifies Alvechurch as a second tier settlement it is clearly expected to receive a large amount of growth and therefore the Neighbourhood Plan should seek to direct this growth through residential allocations.

I. APNP POLICY 2: LOCATIONS FOR NEW HOUSING DEVELOPMENT

Cerda Planning support the principle that brownfield land will be prioritised over greenfield inline with NPPF guidance and that the settlement of Alvechurch will be the focus of residential development. However, brownfield land located outside out the village settlement boundary should not be prejudiced as a result. Brownfield land outside of settlement boundaries that lie in a sustainable location with access to services, facilities and public transport should receive the same level of support as sites that lie within the settlement boundary.

Our client is the owner of Alvechurch Business Park, a brownfield site which lies outside of Alvechurch settlement boundary and falls under Green Belt designation. However, the site has recently received a residential permission to develop the north eastern part of the site (Ref-16/1190) and therefore is clearly considered sustainable by Bromsgrove District Council with principle of development established. The remaining area of the business park remains brownfield in nature and can be considered available, viable and deliverable. Clearly restricting residential development to sites only located within the village settlement boundary is a narrow approach to sustainable development. The NPPF highlights that sustainable development is the golden thread throughout planning, therefore brownfield sites lying outside the settlement boundary but are sustainably located should be given equal weight to sites within the village boundary. This approach is supported in paragraph 89 of the NPPF which states that an exception to Green Belt policy is the **complete redevelopment of previously**

developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Therefore development of our client's site is appropriate development and should not be prejudiced. It is suggested that the policy is amended to demonstrate flexibility in bringing forward sustainably located brownfield sites located outside of the settlement boundary in line with guidance within the NPPF.

II. APNP POLICY 5: HOUSING DESIGN PRINCIPLES

Cerda Planning are generally supportive of APNP Policy 5 as it ensures high standards of design and environmental improvements are achieved. However the Policy must be consistent with the Development Plan in terms of design criteria and justification. The design criteria within APNP 5 can be considered too onerous resulting in sustainable development being constrained by overly prescriptive design policies.

Paragraph 59 of the NPPF highlights that design should be used to deliver high quality outcomes. However design policies should **avoid unnecessary prescription or detail** and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

In light of the above Policy APNP 5 should concentrate on general design guidance in order to facilitate further opportunities for sustainable development and ensure development is not restricted.

III. APNP POLICY 7 PROVIDING A MIX OF HOUSING TYPES AND SIZES

APNP Policy 7 considers housing types and sizes commenting that developments of over 10 units should provide a specific mix of dwellings. The mix outlined is as follows;

- a. 10% of new dwellings should aim to have 1 bedroom
- b. 40% should aim to have 2 bedrooms with an element of ground floor single level dwellings to meet the needs of the elderly and people with disabilities
- c. 40% should aim to have 3 bedrooms
- d. Up to 10% should aim to have 4 or more bedrooms

It is unknown how these conclusions have been established as no evidence base is provided. In addition the Bromsgrove Development Plan states that for sites over 10 dwellings a 'wider mix of dwellings types may be required'. Given that the Development Plan is not prescriptive in the breakdown of the mix of units it is reasonable to question why the draft Neighbourhood Plan suggests an exact mix as above. This mix may prevent certain schemes from coming forward in terms of viability. The policy should follow guidance with the Development Plan in which the housing mix for a scheme is determined on a site by site basis and individual context of the scheme based on up to date housing requirement/market demand.

IV. APNP POLICY 12: PROTECTING LANDSCAPE AND OPEN VIEWS

Cerda Planning are supportive of policy APNP 12 which seeks to safeguard important landscapes and attractive open views. Where possible, all new development should be directed towards previously developed land with greenfield land coming forward as a last resort. All sustainably located previously developed land should be prioritised in terms of

development so as to protect access to open space and key views within the Neighbourhood plan area.

V. APNP POLICY 13: ACCESS TO THE COUNTRYSIDE

Cerda Planning are fully supportive of Policy APNP 13 as access to the countryside is crucial for improved health and wellbeing. Every opportunity should be taken to improve links between residential areas and open space beyond settlement boundaries. Green infrastructure and access to open space is increasingly becoming a material consideration due to green spaces link with a high standard of living and high quality of life.

Our clients site (Scarfield Business Park) lies between the Worcester and Birmingham Canal as well as open countryside to the west of Alvechurch. Development of this site will not only provide a number of sustainably located dwellings but also assist in increasing access to the open countryside. Currently the site comprises previously developed land with excessive hardstanding. Development of the site would provide any future residents with access to both the canal network and the open countryside improving health and well-being. The importance of development that facilitates greater access to the open countryside and green infrastructure is supported and is evidenced by the existing permission (16/1190) for 9 dwellings to the north east of the business park.

VI. APNP POLICY 14: PROTECTION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT

Policy 14 discusses enhancement of the natural environment and how new development can support this. Cerda Planning are supportive of this policy as developing previously developed land is an effective way to improve the natural environment and ensure that instead of land acting as a barrier to wildlife it can actually safeguard, create and reconnect wildlife.

VII. SUMMARY

Cerda Planning recognises the importance of localism and that the Neighbourhood Planning process empowers communities to shape where they live and work. The Alvechurch Parish Neighbourhood Plan is therefore welcomed in principle. The aims and objectives are understood and considered to be important to the long term aspirations of the area. However we are disappointed that plan does not contain housing allocations which can be viewed as a barrier to development within the village, which is contrary to paragraph 184 of the Framework. Whilst the Neighbourhood Plan is aware of the requirement to release Green Belt land, it is outlined a long term strategy. Given the housing requirement for Bromsgrove district in addition to the overspill from neighbouring authorities, it is clear that the neighbourhood plan should take a proactive stance to Green Belt development, ensuring that sustainably located previously developed land is viewed positively and can be delivered in the short term.

My client has secured a residential permission for redevelopment of part of parcel of Scarfield Business Park highlighting its sustainable credentials. It is clear that the rest of the site would act as a logical extension to the settlement of Alvechurch and as such should be viewed favourably.