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PROPERTY CONSULTANCY

Our Ref: P1090/Simon Hawley/typag  
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Dear Sir/Madam,

### **Alvechurch Parish Neighbourhood Plan Pre-Submission Consultation Representations on behalf of Barratt West Midlands**

Harris Lamb Property Consultancy (HLPC) is instructed by Barratt West Midlands to submit representations to the Alvechurch Parish Neighbourhood Plan Pre-Submission consultation document. We welcome the preparation of the document, and support its general approach towards development. There are, however, a number of areas where we believe the emerging Neighbourhood Plan could be improved and areas where changes are required in order to make the Plan consistent with the Bromsgrove Local Plan and the Framework.

Barratt West Midlands have held a series of meetings with the Parish Council to discuss the development potential of their land interest to the East of the Birmingham Road. Previous consultations undertaken by the Parish Council in July 2014 resulted in the land in my Client's control being identified as a preferred location for an extension to the settlement. It is not, however, possible for the Neighbourhood Plan process to amend the Green Belt and to propose an allocation in this location. It is the intention of my Client to continue to work with both the Parish Council and Bromsgrove District Council through the plan making process to confirm the development potential of this site.

Attached to these representations is a copy of the planning promotional document for St Laurence View (the land in Barratt West Midlands' control). It was previously provided to the Parish in October 2016. The promotional document is provided with these representations to outline the development potential of Barratt West Midlands land interest to help inform the plan making process.

We set out below our comments on the emerging Neighbourhood Plan. We would welcome the opportunity to discuss these comments further with the Parish if that is of assistance.

#### **Section 1 – Introduction and Background**

We welcome the acknowledgement in the Introduction section of the Plan that as one of the largest settlements in Bromsgrove District, Alvechurch should take a proportion of the District's future housing numbers. The commentary in the Introduction and Background section of Plan acknowledges that the Neighbourhood Plan should help manage, rather than resist development, is welcomed.

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The acknowledgement that a Green Belt Review will be required in order to identify sites for significant future development around the settlement is also welcomed. The urban capacity of Alvechurch is limited. In addition, the adopted Bromsgrove Local Plan acknowledges that a Green Belt Review is required in order to meet the overall housing requirement. Policy BDP3 - Future Housing Employment Growth, of the Bromsgrove Local Plan advises that 7,000 dwellings are required in the Plan area between 2011 and 2030. There is capacity for 4,700 of these dwellings on land outside of the Green Belt. As a consequence, 2,300 dwellings are required to be delivered on land that is currently in the Green Belt. One of the largest and most sustainable settlements within the District, Alvechurch will have a key role to play in helping to meet the Green Belt housing requirement.

It is also expected that Bromsgrove District will have a key role to play in meeting Birmingham City Council's unmet housing requirement and, potentially the housing needs of the Black Country, which could increase the amount of Green Belt land required significantly.

### **Future Development**

The recognition that Alvechurch should deliver future development is supported. It is also agreed that it is important that local people are given the opportunity to influence where the Green Belt boundary changes should be made by working jointly and cooperatively with Bromsgrove District Council Officers through the Green Belt and Local Plan Review process. Bromsgrove District Local Plan Policy BDP4 – Green Belt, advises at paragraph BDP4.3 that the Green Belt Boundary Review will follow sustainable development principles and take into account up to date evidence and proposals in Neighbourhood Plans. The emerging Alvechurch Neighbourhood Plan will, therefore, clearly be a key consideration in the Council's Green Belt Review. Whilst the Neighbourhood Plan cannot allocate land for development in the Local Plan, it can clearly influence the Council's preferred choice of sites. It is, therefore, our view that the Parish should take the opportunity to use the Neighbourhood Plan to provide an indication of their preferred Green Belt development location to help inform the Green Belt and Local Plan Review process.

The land in Barratt West Midlands control has been identified as being the most suitable location for development in the Green Belt through the Neighbourhood Plan consultation process. In addition, HLPC have undertaken a review of the potential development locations adjacent to the settlement, the findings of which are summarised in the attached Planning Promotional document. It is informed by the Bromsgrove Local Plan evidence based documents including the Council's Area Assessment Study (2013) and SHLAA as well as the Bromsgrove Local Plan 2004 Inspector's Report. It clearly indicates that the land in Barratt West Midlands control should be the preferred location for development going forward.

### **Key Issues for the Future**

We welcome the recognition that high quality design will play an important role in preserving the special character of Alvechurch. Barratt Homes welcome the opportunity to actively engage the Parish and local residents on the design and appearance of any residential development on their land interest in order to help facilitate the delivery of a high quality scheme.

### **The Vision and Key Aims**

We support the Vision and a number of the Key Aims of the Plan. The recognition in Key Aim 1 that development should be proposed to meet current and future needs is fully supported. In terms of Key Aim 2, all development, not just development within the village boundary, should be within walkable distance to key facilities. The Neighbourhood Plan acknowledges that any large



scale development will need to take place outside of the village boundary sites with good access to services and facilities, such as the village school, should be identified as preferred locations for development.

### **APNP Policy 2 – Location for New Housing Development**

As the Neighbourhood Plan cannot be used to allocate land for development in the Green Belt the approach to the location of new housing development in APNP Policy 2 is supported as a short-term objective. However, it is acknowledged at paragraph 4.1.29 of the Neighbourhood Plan that it is likely that land will need to be released from the Green Belt to meet the growth requirements of Alvechurch through the Local Plan process. As a consequence, part A of the policy that seeks to direct development to land within the designated village boundary, will conflict with this policy objective. It is acknowledged that the supporting text suggests that this policy may need to be reviewed following release of land from the Green Belt through the Local Plan process. There will, however, be a time lag between the preparation of the Bromsgrove Local Plan review and an updated Neighbourhood Plan. It is, therefore, suggested that text is added to Policy APNP 2 to advise that Part A of the policy applies until such point that the Local Plan Review process releases land from Green Belt for development. At this point, development will be expected to be located on land within the settlement boundary or land allocated for development through the Local Plan Review process.

### **APNP Policy 5 – Housing Design Principles**

A policy encouraging high quality design is supported. However, reference to the developments being “small scale” is inappropriate. The exact quantum of development that will be directed towards Alvechurch through the Bromsgrove Local Plan review is yet to be established. The Neighbourhood Plan recognises the fact that Green Belt land release will be required for any notable new developments to take place at Alvechurch. Whilst the term “small scale” is not defined by the policy, it is likely that any potential Green Belt release site would not be “small scale” and an unnecessary policy conflict could arise. It is, therefore, suggested that this wording is removed from the policy.

### **APNP Policy 7 – Providing a Mix of House Types and Sizes**

We are concerned that Part 4.1.119 of the policy sets a prescriptive mix of house sizes. The Neighbourhood Plan is being prepared to cover the period up to 2030. During the course of the Plan Period, the housing needs of the Parish could change. Housing needs will be influenced by both the changing age population of Alvechurch and the existing properties that become available for sale within the village.

Furthermore, it is noted that the housing mix in the policy is based upon the Worcestershire SHMA 2012/13. This is already an old document and it's evidence of housing mix is out of date. We are, therefore, concerned that this is being used to inform the mix requirements of this policy.

It is our view that the policy should be amended to advise that developments will be expected to provide a mix of property sizes. The mix proposed should be informed by market requirements at that time.

### **APNP Policy 8 – New Housing, Improved Services and Facilities**

It is acknowledged that a planning obligation package should be provided with new developments to offer such an impact. The impacts of housing developments are linked to their



size, location and the capacity of services within the village at the time the application is made. It is, therefore, difficult to predict exactly what a planning obligation package for a future development will be. In addition, if Bromsgrove adopt a CIL, the process for establishing and directing planning obligations becomes substantially streamlined.

It is, therefore, our view that Policy 8 needs to be amended to remove the list of potential projects where planning obligations will be spent. This makes the policy inflexible and certain developments may not trigger a requirement for the improvements identified.

### **APNP Policy 13 – Access to the Countryside**

We support the recognition that new developments should improve access to the countryside by connecting into and upgrading footpaths, cycleways and bridleways. Development with good access and pedestrian connectivity should be supported. In this regard, it should be noted that the land in Barratt West Midlands control will provide easy access to the River Arrow and provide a footpath connection between Birmingham Road and the river.

### **APNP Policy 15 – Provision and Improvement to Healthcare Facilities**

Policy 15 suggests that new major developments should be accompanied by a Health Impact Assessment. The Health Impact Assessment should demonstrate the potential impacts on health and wellbeing as a consequence of the development. It is suggested that this should be undertaken at the pre-application stage. However, often at the pre-application stage the exact details of development are not known. The pre-application process can be used to inform the nature, scale and appearance of developments. It is, therefore, our view that it is inappropriate to suggest that Health Impact Assessments should be undertaken as suggested.

### **APNP Policy 17 – Improvement to, and Protection of, Open Spaces**

It is noted that a part of this requirement of Policy 17 seeks to improve access and linkages for cyclists and pedestrians, especially alongside the River Arrow and canal towpath and connecting public rights of way to open space. The land in Barratts West Midlands control adjoins the River Arrow. It provides the opportunity to assist in the aspiration to improve the connectivity alongside the River Arrow. This is a significant benefit of the development of the site.

### **APNP Policy 18 – Sport, Leisure and Recreational Facilities**

The requirements of the policy advise that proposals that meet the requirements of the local community will be considered favourably. Paragraph 4.3.54 of the policy identifies improvements to riverside walks along the River Arrow and linkages between spaces as providing aspiration. The land in Barratt West Midlands control abuts the River Arrow. It provides the opportunity to enhance the riverside walks in this location and create usable green space next to the river.

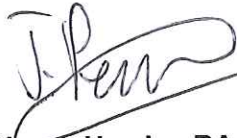
### **Community Action 8 – Future Growth of the Parish**

We welcome the recognition in Community Action 8 that the Parish Council will work practically with Bromsgrove District Council and provide a steer at the appropriate time as to where future development should be located. We agree that it is important local residents should have a say in where future developments should take place. Reference is made in paragraph 5.10 of the Neighbourhood Plan to previous consultation undertaken by the Parish Council on the preferred locations for development outside the village boundary. We are, however, of a view that it would be helpful if additional text were included that confirms the outcome of this consultation exercise.

This would provide a clear steer for anyone reading the Neighbourhood Plan as to where the site that was identified as the preferred location for growth outside of the settlement. It will also assist the District Council in the preparation the Green Belt and Local Plan Review by understanding the Neighbourhood Plan's preferred growth objectives.

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

Kind regards,



PP  
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