

Our Ref: NR/640/Alvechurch  
Your Ref:

17 November 2017

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Dear Sir / Madam

**COMMENTS ON THE ALVECHURCH PARISH NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION**

GVA is instructed by Taylor Wimpey UK Limited ("Taylor Wimpey") to submit comments to the Alvechurch Parish Neighbourhood Plan pre-submission consultation.

Taylor Wimpey has interest in land east of Swan Street, Alvechurch ("the site"), which is identified on the attached **Aerial Location Plan**.

**Site and background context**

***The site and its surroundings***

The site is circa 13 hectares and adjoins the south east edge of Alvechurch and is within the Green Belt. To the north of the site is open space and to the south is Alvechurch Football Club. The site is bound to the west by existing residential dwellings along Redditch Road and Swan Street, and to the east by the A441.

The site and its surroundings have the following key features:

- There is a road and Public Right of Way which bisects the site west to east from Redditch Road;
- The River Arrow runs along the north and east border of the site;
- Alvechurch Conservation Area is across the northern boundary of the site which contains a number of listed buildings; and
- A Scheduled Ancient Monument is immediately north of the site (moated site and fishponds at the Bishop's Palace). The fish ponds are also a Local Wildlife Site/Special Wildlife Site.

***Bromsgrove District Council's Development Plan***

The Development Plan for Bromsgrove is the Bromsgrove District Plan 2011 to 2030 which was adopted by the Council on the 25 January 2017. This sets out the Council's vision and strategy for the District and how development will be accommodated to the year 2030.

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Policy BD2: 'Settlement Hierarchy' sets out the role of the District's settlements to enable allocation of appropriate levels of growth. Alvechurch is defined as a 'large settlement' which is the second tier in the settlement hierarchy after the 'main town' of Bromsgrove.

Policy BDP 3: 'Future Housing and Employment Growth' contains the detail of the growth strategy for the District and is based on the 2012 Worcestershire Strategic Housing Market Assessment (SHMA). This considers that the objectively assessed housing need for Bromsgrove is 6,648 and that therefore, planning for 7,000 homes over the period 2011-2030 meets the housing requirement of the District.

The sites and associated development trajectories identified in the District's 2013 Strategic Housing Land Availability Assessment (SHLAA) highlight that approximately 4,700 homes will be delivered over the plan period without development in the Green Belt.

A full Green Belt Review is therefore required for Bromsgrove to ensure that land can be identified for the remaining 2,300 homes.

Policy BDP 4: 'Green Belt' outlines the detail of the District's upcoming Green Belt Review that will be undertaken in accordance with Policy BDP 3 in advance of 2023. It will identify:

- a) Sufficient land in sustainable locations to deliver approximately 2,300 homes in the period up to 2030 to deliver the objectively assessed housing requirement for Bromsgrove District;
- b) Safeguarded land for the period 2030-40 to meet the development needs of Bromsgrove District and adjacent authorities based on the latest evidence; and
- c) Land to help deliver the objectively assessed housing requirement of the West Midlands conurbation within the current plan period i.e. up to 2030.

In accordance with the Green Belt Review, land will need to be allocated for development in a Local Plan Review. The timing of the Green Belt Review and Local Plan Review are not currently known and will be determined by updated evidence and the monitoring of housing delivery against the Council's projected housing trajectory.

### ***Alvechurch Parish Neighbourhood Plan***

Taylor Wimpey understands that the Alvechurch Parish Neighbourhood Plan Steering Group (on behalf of the Parish Council as the qualifying body) has now completed a draft Neighbourhood Plan for the period to 2030.

Assuming that the examiner recommends that the draft Neighbourhood Plan can proceed and that there is a majority outcome during the referendum, the Neighbourhood Plan will be "made" and will become part of Bromsgrove District Council's Development Plan. It will therefore be a statutory consideration when determining planning applications in the Alvechurch Parish.

### **Comments on draft planning policies**

We set out our comments herewith on the relevant policies contained within the pre-submission version of the Alvechurch Parish Neighbourhood Plan (APNP) and respond accordingly to ensure that the Neighbourhood Plan is positively prepared, justified, effective and consistent with local and national planning policy. Specifically, we respond on the sections, topics and policies within the Neighbourhood Plan identified in the table below.

Section	Topic area and policies
1. Introduction and background	
2. Alvechurch today	
4. The policies of the APNP	Topic 1: Policies for new housing - policies 2, 5, 6, 7 and 8

	Topic 2: Policies for heritage, design and the natural environment - policies 9, 10, 11, 12, 13 and 14
	Topic 3: Policies for leisure, health and wellbeing - policies 15, 17 and 18
	Topic 5: Policies for getting around - policies 26, 27 and 28
<b>5. Future growth in the Parish</b>	
<b>6. Monitoring and review of the plan</b>	

### **Sections 1 and 2: Introduction and background and Alvechurch today**

In sections 1 and 2 of the draft APNP there is clear acknowledgment that Alvechurch Parish will be required to take a proportion of Bromsgrove's future housing growth, given it is one of the larger settlements in the District, as set out in the adopted Bromsgrove District Plan.

Importantly there is recognition that Alvechurch Parish has only Green Belt land available now for any significant future development which will need to be considered for growth.

There are also various statements about the Parish Council working closely with Bromsgrove District Council when it undertakes a Green Belt Review as part of the Local Plan Review in order to ensure that any release of Green Belt land in the Alvechurch Parish is in the most sustainable locations.

Taylor Wimpey welcomes the recognition within the draft Neighbourhood Plan that Alvechurch will be required to accommodate future housing grown on Green Belt land.

A Development Statement is currently being prepared by Taylor Wimpey to set out a vision for the site and to demonstrate how a sustainable, high quality development could be brought forward. The Development Statement is informed by a suite of technical and design evidence and will be available to discuss with Parish Council once complete.

### **Section 4: The policies of the APNP**

Section 4 establishes a series of planning policies which are linked to the vision for the Parish. Each policy is supported by relevant background information, evidence and justification.

#### **Topic 1: Policies for housing**

A number of policies within the APNP relate to housing and Taylor Wimpey's comments on these are set out below.

Paragraph 4.1.14 outlines that during community consultation, local stakeholders favoured "option 1" for future housing which proposes that future Green Belt development should only be adjacent to current houses.

Paragraph 4.1.29 sets out that support will be given to well-designed new housing located on brownfield sites within the Alvechurch Village settlement boundary and that if it is decided in the future that land should be released from the Green Belt, then there will be a revision of the Neighbourhood Plan to deal with any necessary changes.

Taylor Wimpey is pleased that the Parish Council is taking a positive and proactive approach to future housing growth in the Parish and that the Parish Council will ensure that the Neighbourhood Plan is kept up-to-date.

Should the site become allocated, Taylor Wimpey is committed to delivering a high quality and sustainable scheme that responds to the local surroundings and integrates with the neighbouring existing residential dwellings.

### ***APNP Policy 2: Locations for new housing development***

Policy 2 sets out a series of criteria that relate to new housing development. The policy states that apart from the Alvechurch Village itself, the neighbourhood area is designated as Green Belt and that inappropriate development will not be permitted in the Green Belt unless very special circumstances can be demonstrated (as set out in the National Planning Policy Framework (NPPF), paragraphs 87 to 89).

Although the introductory text to policy 2 is clear that Green Belt land will be required for future housing development, this is not reflected within the policy text itself. It is therefore recommended that a statement similar to that made in paragraph 4.1.29 is added to policy 2. This will help to affirm the Parish Council's commitment to review such land in line with future changes to the Bromsgrove District Local Plan.

### ***APNP Policy 5: Housing design principles***

In terms of housing design principles, paragraph 4.1.79 sets out that local preference is for housing to be limited to small developments with a majority of properties being for one, two and three bedrooms. Developments should be aimed at those accessing housing for the first time and for elderly residents wishing to downsize.

The following principles are established through policy 5:

- High quality design;
- Proposals limited to a maximum of two storeys except where the surrounding local built character would be appropriate for greater;
- Locally sourced indigenous materials and suitable detailing reflecting local building style is encouraged;
- Housing developments should meet the requirements of "Secured by Design" and achieve the highest standard of "Building for Life"; and
- Development should maximise the use of renewable energy opportunities, where feasible, including use of solar panels and sustainable drainage.

Emphasis is placed on the need for developers to use the Alvechurch Parish Design Statement as guidance when formulating development proposals.

Taylor Wimpey appreciates the importance of high quality design and would endeavour to meet the principles of the APNP if the site becomes allocated. The importance of the Alvechurch Parish Design Statement is recognised and would be relied upon when formulating the development proposals. The proposals would also adhere to nationally accepted design guidance such as "Secured by Design" and "Building for Life".

Taylor Wimpey does however wish to highlight that the design intricacies of any future development at the site cannot yet be confirmed and that viability matters could affect the extent to which renewable energy features are incorporated on the site. This would need to be explored further and agreed with the relevant stakeholders in due course.

***APNP Policy 6: Sustainable development through design***

This policy sets out that developers will be encouraged to demonstrate how their proposal will achieve a high level of environmental sustainability in terms of design and construction.

The supporting text notes that sustainable design is covered by national standards and that in Alvechurch Parish there is encouragement for developers to go beyond the national standard and build exemplary sustainable homes.

Given that the Housing White Paper outlines the Government's intention to minimise the use of local standards (through the Housing Standards Review) Taylor Wimpey is pleased that the Neighbourhood Plan draws upon national standards.

Whilst Taylor Wimpey is committed to delivering a development with the best possible sustainability credentials for both design and construction, the ability to exceed national standards would be determined by viability matters.

***APNP Policy 7: Providing a mix of housing types and sizes***

APNP Policy 7 concerns housing mix and establishes a number of principles, namely:

- Developments of 10 or more dwellings shall provide a mix of house types and garden space that is proportionate to each dwelling;
- New housing shall be well designed in scale, form and character to meet the needs of current and future households in the Neighbourhood Plan area;
- Development of 11 or more dwellings will be required to include an element of affordable housing in accordance with the NPPF and the adopted BDP Policy 8 where viable;
- Proposals for 10 or more dwellings should seek to achieve the following mix unless viability or other material considerations show a robust justification for a different mix;
  - a) Overall up to 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; and
  - d) Up to 10% should have 4 or more bedrooms.

The policy justification sets out that the APNP seeks, based on the 2012 Worcestershire SHMA, a proportion of smaller housing for first-time occupiers and older residents wishing to downsize.

Information within the policy justification sets out that local residents consider that additional housing should be limited to small inexpensive houses if the Green Belt has to be used.

The SHMA is considered to be a robust basis for the house type targets set out in the draft Neighbourhood Plan; however, it will be important to maintain flexibility to allow for changing local circumstances. It will also be important that the housing mix prescriptions are revised in line with up-to-date evidence (for example the District-wide reports relating to housing need that are being prepared in accordance with Bromsgrove District's Local Plan Review).

***APNP Policy 8: New housing, improved services and facilities***

This policy sets out that proposals for new housing developments that make provision for new or improved services and facilities will be supported when related tariffs and obligations trigger financial contributions through the Community Infrastructure Levy (CIL) and other applicable mechanisms.

The policy further outlines that contributions will be required as appropriate from each developer to fund additional healthcare, education, leisure facilities, green infrastructure, highways and transportation. A list of potential local facilities and services to be provided is set out, although expressed that these will vary over time.

Taylor Wimpey affirms in principle support for contributions to community facilities to be sought from new residential development. However, this should of course be considered on a site by site basis depending on the viability of the proposed scheme. An allowance should be made for contributions to be negotiated in the light of viability considerations so as not to preclude the development of otherwise suitable sites.

Taylor Wimpey notes that Bromsgrove District Council does not currently have an adopted CIL charging schedule. It will be necessary to ensure that contributions sought in respect of improved local services and faculties are consistent with any future adopted CIL charging schedule, or in the absence of this, with the CIL Regulations 2011, as amended.

## **Topic 2: Policies for heritage, design and the natural environment**

Policies within the APNP concerning heritage, design and the natural environment are also relevant to Taylor Wimpey's interest in the land east of Swan Street, Alvechurch. These policies are:

- Policy 9: Built heritage and local character;
- Policy 10: Local distinctiveness;
- Policy 11: The Alvechurch Parish Design Statement;
- Policy 12: Protecting landscape and open views;
- Policy 13: Access to the countryside; and
- Policy 14: Protection and enhancement of the natural environment.

Key points from the above policies are that:

- Development adjacent to the Parish Conservation Area should respond to the distinctive local built character and its particular surroundings, and sensitively contribute to creating quality design appropriate to its rural setting (policy 9).
- Any new development adjacent to a heritage asset should be sensitively designed to conserve and enhance the setting, form and character of the heritage asset (policy 9).
- Developers are required to take full account of the Alvechurch Parish Historic Environment Resource Assessment, the Alvechurch Parish Design Statement and the Alvechurch Historic Environment Action Plan documents when preparing proposals for development (policies 9, 10 and 11).
- Proposals for new development will be supported that are in-keeping with their surroundings (policy 10).
- The protection and safeguarding of historic boundaries and historic hedges, especially around the Bishop's Palace will be assessed (policy 10).
- New development should preferably be located on land of lesser environmental value and respect and seek to protect high-value agricultural land, important views, landmarks and local points of interest in the neighbourhood area (policy 12).
- Proposals for new development should connect the new development to the countryside and where possible to key places such as the Worcestershire and Birmingham canal and the River Arrow (policy 13).
- New development should protect and enhance the natural environment and locally valued habitats and wildlife, particularly relating to the River Arrow, amongst others (policy 14).

The key features of the site and its surroundings were set out at the beginning of this submission and include proximity to the River Arrow, Alvechurch Conservation Area, Scheduled Ancient Monument and Local Wildlife Site/Special Wildlife Site.

The Development Statement being prepared for the site considers a range of technical matters including heritage and ecology. The findings from the technical studies will be included in the Development Statement and form the basis of a proposed masterplan for the site.

Taylor Wimpey is committed to delivering a scheme which responds to the sensitivities of the site and surrounding local environment, ensuring that any future development would not have adverse impacts on local heritage and the natural environment.

### **Topic 3: Policies for leisure, health and wellbeing**

There are policies within the APNP relating to leisure, health and wellbeing which Taylor Wimpey also wishes to make brief comments on:

- Policy 15: Provision and improvement to health care facilities;
- Policy 17: Improvement to, and protection of, open spaces; and
- Policy 18: Sport, leisure and recreation facilities.

Key points from these policies are that:

- For major developments a Health Impact Assessment (HIA) will be required where the proposal is likely to have a major impact and measures to mitigate impact will be secured by planning obligations (policy 15).
- Development that would result in the loss of open space or cause harm to the setting, character, appearance, general quality or accessibility will not be permitted unless the community will gain equivalent benefit from open space improvements or the provision of replacement open space. Open spaces that are particularly valued by the local community include along the course of the River Arrow wildlife corridor (policy 17).
- Improving access linkages alongside the River Arrow and canal towpath and connecting Public Rights of Way to open spaces is a priority (policy 17).
- Proposals for new residential development of 10 homes or more will be encouraged to contribute towards the provision of new, and improvements to, existing sport and recreation facilities (policy 18).

The position of the site within its wider context is a key consideration. The provision of and access to open spaces, recreational and community facilities are being explored through the Development Statement for the site. Any financial contributions levied towards such amenities will need to be considered in the light of financial viability. Taylor Wimpey therefore advises that viability and feasibility are referred to in these policies so that the Neighbourhood Plan policies do not jeopardise the delivery of potential housing sites.

### **Topic 5: Policies for getting around**

Key points are drawn from the following policies:

- Policy 26: Getting around;
- Policy 27: Provision of adequate parking; and
- Policy 28: Improving road safety and traffic management.

Taylor Wimpey notes the following points within these policies:

- Proposals for development should identify the realistic levels of traffic they are likely to generate and must assess the potential impact on the local community. Proposals that contribute to the attractiveness of walking, cycling and use of public transport will be considered favourably. Financial contributions for local infrastructure enhancement will be required where adverse impacts are identified (policy 26).
- Development proposals, where appropriate, should provide parking in accordance with Worcestershire County Council's standards (policy 27).
- The Parish Council will seek to promote traffic calming measures through developer contributions and use of any future adopted CIL receipts. Developers must take proportionate steps to mitigate any highways impacts arising from development (policy 28).



Pedestrian and vehicle access and egress to and from the site is being considered through the Development Statement, as are the potential routes through and around the site. The proposed masterplan for the site will be based upon technical evidence pertaining to transport and highways, and will seek to avoid the generation of negative impacts in the neighbourhood area.

Again, any reference to developer contributions within the Neighbourhood Plan policies should be worded to allow for consideration of financial viability in order that the delivery of suitable sites is not prejudiced.

### **Section 5: Future growth in the Parish**

Section 5 of the APNP deals with how future development might be addressed in the Alvechurch Parish neighbourhood area, given a large area of the Parish is covered by Green Belt policy.

Paragraph 5.8 sets out that the NPPF is clear that Green Belt Reviews are matters only for local planning authorities such as Bromsgrove District Council and not for Neighbourhood Plans. In the interest of the Localism Act 2011 however, whilst the Neighbourhood Plan cannot revise the Green Belt boundary through its own policies, the Parish Council believe that it is extremely important that local residents should have a substantial say in where such future local planning authority led changes for Alvechurch might be.

In this respect, Taylor Wimpey understands that the local community has previously given their views on broad areas of land around Alvechurch at a community consultation event for the Neighbourhood Plan.

Taylor Wimpey is cognisant of the relationship between Bromsgrove District's Local Plan and the emerging Neighbourhood Plan for Alvechurch Parish and is pleased to see that, as far possible, local people residing in the Parish have been, and will continue to be involved in decisions about where future housing development is directed.

Emphasis is placed on the potential offered by the land east of Swan Street, Alvechurch, for residential development and Taylor Wimpey would be pleased to discuss the site with the Parish Council once the Development Statement and its supporting work is complete. This suggestion is made with the view that the Parish Council would consider the site as one of the favoured locations for the growth of Alvechurch in the future, in accordance with any reviews of the Neighbourhood Plan.

### **Section 6: Monitoring and review of the plan**

Section 6 of the APNP states that Alvechurch Parish Council will ensure the Neighbourhood Plan is followed and regularly reviewed.

In order to actively manage the Neighbourhood Plan between its adoption and the end date of 2030, and to take account of possible changes in national or local planning policies, the following review periods will be adopted:

- After the Neighbourhood Plan's implementation, the Parish Council will prepare an annual report to monitor the plan progress and assess whether the policies have been effective when determining planning applications in the neighbourhood area.
- The Neighbourhood Plan will be reviewed every five years. The first review is likely to take place in 2022/23, followed by a second review in 2027/28. The purpose of the review will be to revise and update the plan as changes happen in the Parish.
- During the review in 2027/28 the Parish Council will consider the need for a subsequent Neighbourhood Plan.



Taylor Wimpey is supportive of the suggestions that the Neighbourhood Plan will be reviewed in the future. Such reviews should take place in line with the review of Bromsgrove District's Local Plan and updated evidence associated with this, particularly in respect of housing need and the Green Belt.

Subject to the outcomes of the District Green Belt Review and the approach taken in the Local Plan Review, Taylor Wimpey expects that a review of the Neighbourhood Plan would need to identify Green Belt sites for development and / or contain specific policies for the development of Green Belt sites around the Alvechurch Parish (perhaps containing greater detail than that in the revised Local Plan).

However, it will be important that the any future reviews of the Neighbourhood Plan do not impose overly burdensome prescriptions on Green Belt sites to the point where the delivery of the sites is threatened. This is because delivery of Green Belt sites will be critical in achieving Bromsgrove District's housing requirement.

### **Conclusions**

Overall Taylor Wimpey supports the draft Neighbourhood Plan and particularly the recognition that in the medium to long term, Green Belt land will need to be developed within the Parish boundary. This is in accordance with the extant planning policies of the adopted Bromsgrove District Plan and forthcoming Bromsgrove District Green Belt Review and Local Plan Review.

Taylor Wimpey welcomes the opportunity to engage with the Parish Council pre and post adoption of the Neighbourhood Plan to ensure that its aspirations in respect of the land east of Swan Street, Alvechurch, and the Neighbourhood Plan are aligned.

Such dialogue would help to realise the full potential of the site and deliver housing to achieve the necessary levels of housing growth within Bromsgrove District.

In addition to the **Aerial Location Plan**, the following drawings are appended to this letter to support Taylor Wimpey's vision for the site:

- **Site Features and Opportunities Plan;**
- **Illustrative Concept Masterplan;** and
- **Illustrative Hand Drawn Sketches.**

These will be included in the Development Statement together with other supporting drawings and technical information which will be made available to the Parish Council in due course.

Should you wish to discuss any aspect of this submission, please contact GVA in the first instance using the details below.

Yours faithfully



**Natalie Render MSc MRTPI**  
**Senior Planner**  
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**For and on behalf of GVA Grimley Limited**

Site  
Boundary






















Project Name	Drawing Title
Land East of Swan Street, Alvechurch	Aerial Location Plan
Job no. BMPL - 373715	Dwg no. A105
Date: 16 Nov 2017	Scale: NTS
Rev.	Drawn by: M.L.
	Checked by: B.G.



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LEGEND

-  Site Boundary (approx. 13.0ha)
-  Primary Site Access
-  Private Access to Neighbouring Residential Property to be Retained
-  Private Access to Existing Farmstead to be Retained
-  River Arrow
-  Existing Pond
-  Low Lying Areas - Potential to Accomodate SuDS
-  Indicative Existing Trees
-  Exposed Boundary Edge
-  Flood Zone 2
-  Alvechurch Conservation Area
-  Listed Buildings
-  Assumed Alignment of Drain from Title Plan (Source Unknown)
-  Bridleway - AV-581(C) / AAV-588 (C)
-  Bishop's Palace - Scheduled Ancient Monument
-  Suggested Extent of Development Offset to Scheduled Ancient Monument
-  Accomodate Long Range View to Newbourne Hill
-  Potential Source of Odour from Water Pollution Control Centre
-  5m Contours

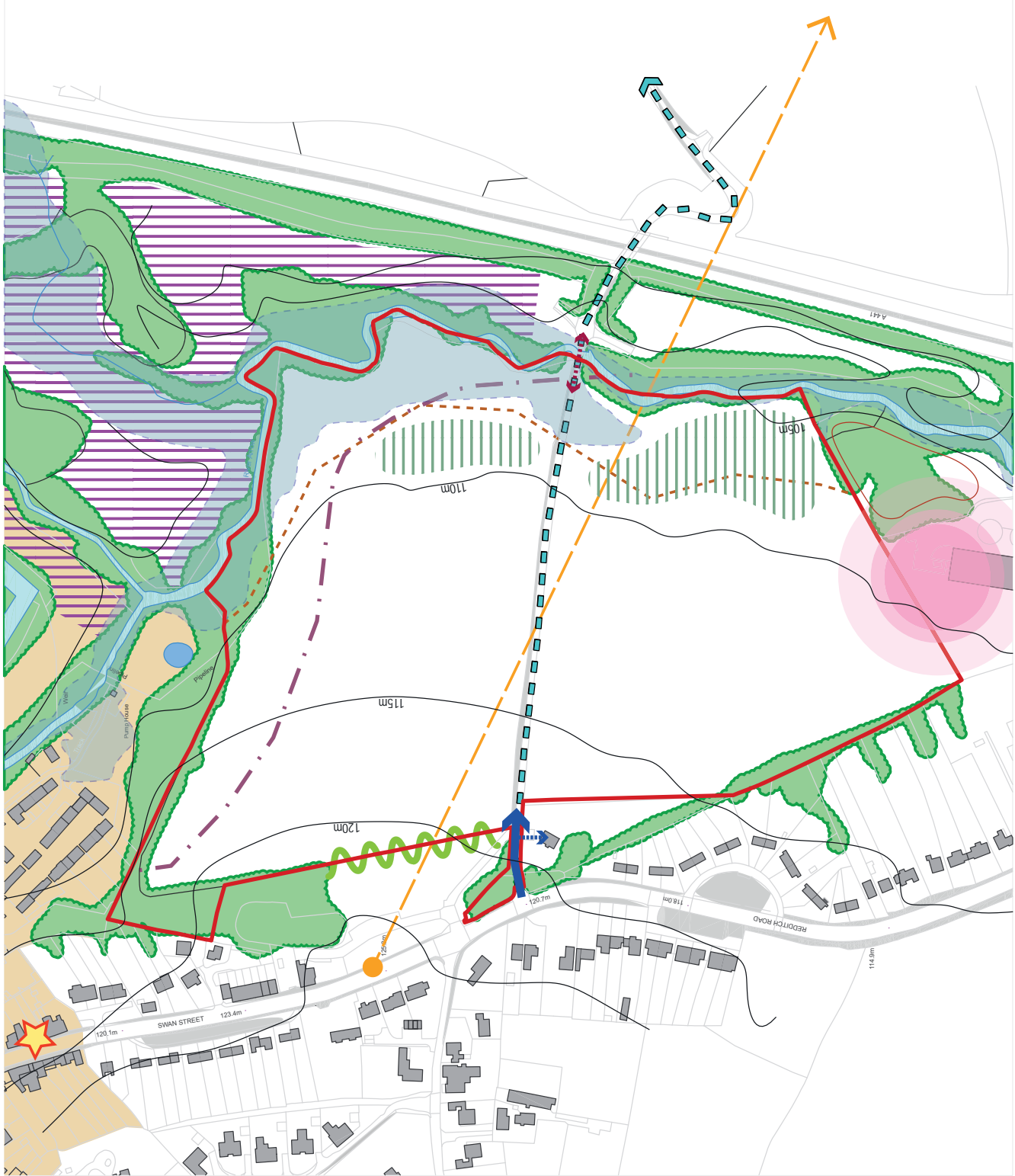


Project Name  
**Land East of Swan Street, Alvechurch**

Drawing Title  
**Site Features and Opportunities Plan**

Job no. BMPL - 367165    Dwg no. A01    Rev.  
Date: 31 Jan 2017    Scale: 1:2500@A3    Drawn by: B.G.    Checked by:

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# LEGEND

Site Boundary (approx 13.01ha)



0 50m 100m  
SCALE 1:2500

Project Name  
Land East of Swan  
Street, Alvechurch

Drawing Title  
Illustrative Concept Masterplan

Job no. BMPL - 367165

Rev.  
Drawn by M.L.

Date: 02 Feb 2017

Scale: 1:2500@A3

Checked by B.G.

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Project Name  
Land East of Swan  
Street, Alvechurch

Drawing Title  
Illustrative Hand Drawn  
Sketch 1

Job no. BMUD - 373615

Dwg no. 08

Rev.

Date. 03 Nov 2017

Scale. NTS

Drawn by. C.O.  
Checked by. B.G.





Project Name	Drawing Title
Land East of Swan	Illustrative Hand Drawn
Street, Alvechurch	Sketch 2
Job no. BMUD - 373615	Dwg no. 09
Date: 03 Nov 2017	Scale: NTS
	Rev.
	Drawn by: C.O.
	Checked by: B.G.

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