

## Churchill and Blakedown Neighbourhood Plan Publication

Name	Summary of Representations
<b>Consultation 20<sup>th</sup> May – 1<sup>st</sup> July 2016</b>	
Environment Agency	<p>We note there do not appear to be any additional site allocations proposed within the Plan.</p> <p>We would only make substantive further comments on the plan if it were seeking to allocate sites in Flood Zones 2 or 3 (the latter being used as the 100 year climate change extent).</p>
Highways England	<p>In relation to the Churchill and Blakedown Neighbourhood Plan, Highways England's principal interest is safeguarding the operation of the M5 which routes approximately 7 miles to the west of the Plan area.</p> <p>It is noted in Policy CB17 – Scale and Type of New Residential Development that development growth will be small scale in nature and, in this regard, Highways England does not consider that there will be any impacts on the operation of the strategic road network, and therefore has no comments.</p> <p>Highways England notes that the A456 routes through the plan area and that it acts as a diversionary route for M5 traffic when the motorway is closed NB between J6 and J5 due to repair works or other incidents. It further notes that traffic calming measures are proposed as part of Policy CB2 – Transport Improvements, for routes which run through the centre of the village. Whilst the Plan is non-specific in terms of which routes could be subject to these measures, Highways England considers that any proposal for traffic calming measures on the A456 would need to be carefully considered. Physical traffic calming measures could impact on the A456's role as a diversionary route for the M5. Highways England would therefore prefer alternative measures to be considered such as the use of Interactive Traffic Signs – Vehicle Activated and Variable Message.</p>
Historic England	<p>We are pleased to see our comments on an earlier draft have been acted upon. Historic England is supportive of both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character including important views is to be applauded. We also highly commend the approaches taken in the Plan to ensuring that the design of new development contributes to the conservation and enhancement of the historic environment.</p> <p>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.</p>
National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus. National Grid has identified the following high pressure Gas Distribution pipelines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 1144 Hanbury - Swindon Junction – HP Pipeline</li> <li><input type="checkbox"/> 1439 Hossil Lane – Kidderminster – HP Pipeline</li> </ul> <p>National Grid has identified the following high voltage overhead powerline as falling within the Neighbourhood area boundary:</p>

	<p>□ ZN Route - 400kV from Feckenham substation in Redditch to Penn substation in South Staffordshire</p> <p>From the consultation information provided, the above gas distribution pipelines and overhead powerline do not interact with any of the proposed development sites.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there is no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a></p>
Natural England	<p>Natural England does not have any further comments on this draft neighbourhood plan.</p>
North Worcestershire Water Management	<p>I believe that the importance of the Blakedown Brook with its pools and tributaries is recognised, which now includes the Hurcott and Podmore Pools SSSI. Through policies CB5 (17&amp;18), CB6 (12) and CB8 (1-5) the Neighbourhood Plan stresses that it is important that any new development within the parish will not negatively impact upon the water environment and gives guidance on how to do this. Action 7 sets out that the Parish Council will work with land owners and statutory bodies to ensure that the networks of pools and interconnecting streams run freely, which is welcomed.</p> <p><b>Conclusion</b> I conclude that my comments upon the draft plan are taken on board and I have no adverse comments to make upon the current version of the Neighbourhood Plan.</p>
RCA Regeneration	<p>Housing – Objective 7- <i>To support small- scale housing development within the village boundaries that meet local needs.</i></p> <p>A strong reason to raising an objection to the Churchill and Blakedown Neighbourhood Draft Plan is the requirement for further assessment of housing need during the review period of the Wyre Forest core strategy.</p> <p>Land at station yard, off Lynwood Drive Blakedown site is an sustainable location to provide additional new housing as it would make more efficient use of this currently vacant site and take some pressure off the development in less sustainable locations.</p> <p>There is a need for additional housing within the District and nationally. This draft neighbourhood would provide opportunities for a future windfall site that would contribute to meeting the Council housing numbers in accordance with Core Strategy Policy The Neighbourhood plan should have a certain regard to national and local policy and judgement should be made on the conformity of the strategic policies in the development plan which is detailed at Paragraph 184 of the National planning policy Framework states that “Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies”.</p> <p>As there has been no call for site exercise undertaken for the Churchill and Blakedown neighbourhood plan (Para 4.5.7) there has been no consideration for potential sites within the parish to be brought forward. The NPPF recognises the need <i>‘The presumption in favour of sustainable development is principally a means of ensuring that plans, both local and neighbourhood, are positively prepared to achieve the best social, economic and environmental outcomes for an area. Neighbourhood plans need to have appropriate regard to this national policy. The presumption makes clear that</i></p>

	<p><i>planning applications which are in line with local plans and neighbourhood plans should normally be approved. This should be a strong incentive to put local and neighbourhood plans in place.'</i></p> <p>As the Neighbourhood plan details there is a shortage of 1, 2 and 3 bedroom properties in Blakedown (4.5.5) and therefore land at station yard could be deemed to provide a sustainable site to meet demand for small infill/windfall site. Therefore there would be in support of the policy CB17 relating to scale and type of new residential development would <i>'convert or re-use an existing building or previously developed land.'</i> We consider the station yard site would reflect this policy and provides a good windfall site, reducing pressure on sites in open countryside elsewhere in the District and meet the neighbourhood plan housing need.</p> <p>Development located in Local Strategic Villages such as Blakedown will perform an economic role by providing land for aspirational and affordable housing, which expands the quality and choice of housing size and tenure. New development located in these areas will provide new residents, who will provide increased levels of disposable income that will (in part) be spent locally supporting existing services and facilities. Paragraph 7 of the NPPF identifies that the economic role of sustainable development is <i>'contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure'</i>. This is taken forward in paragraph 9 of the NPPF which notes that in pursuing sustainable development involves <i>'making it easier for jobs to be created in cities, towns and villages'</i>.</p> <p>The above highlights the duty on the Blakedown Neighbourhood Plan to plan positively for job creation and economic development in alignment with the Framework. Significant economic growth can be achieved with evidence that supports the deliverability of the requisite housing; this would be the appropriate level of growth to ensure compatibility with the economic aspects of the NPPF. Ensuring that new development is located to LSVs will mean that the Blakedown Neighbourhood Plan will be in alignment with the NPPF and the economic principles within it.</p>
Sport England	<p>Planning Policy in the <b>National Planning Policy Framework</b> identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Paras 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of</p>

	<p>playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a></p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below:  <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.  <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.  <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p>
Worcestershire County Council	We do not object to the content of the consultation and have no further comments to make at this stage.
<b>Consultation 30th November 2016 – 25<sup>th</sup> January 2017</b>	
A Addison	<p>Policy CB3 - Lists requirements for all development within the conservation area and within setting of listing buildings. Criteria 6) requires parking and servicing areas to be concealed behind built frontages. - Not clear why this is necessary. Within the conservation area there are numerous examples of parking to the front of buildings, clearly visible within street scene. Concealing parking in this manner suggested would not harmonise with the character and appearance of the conservation area and would be overly restrictive - Remove criterion 6) from Policy CB3.</p> <p>Policy CB4 - Part 1) of this policy requires all development to ensure unknown deposits are identified and appropriately considered during development. This would add a huge burden and expense to every development. Only where there is a reasonable and identifiable potential for a site to contain archaeological deposits should this be required - Alternative suggested wording 1) New development must take account of known surface and sub-surface archaeology, and, where there is a reasonable and identifiable potential for unknown archaeological deposits to be present, ensure they are identified and appropriately considered during development.</p> <p>Policy CB6 - Part 1) of this policy states that "no development will be</p>

	<p>permitted that encroaches or has a detrimental effect on the visual amenity of the green wedge that separates Blakedown and Hagley." This is overly restrictive, as any development in this area would 'encroach' on the visual amenity. This area is designated as Green Belt - so does not reasonably require any further restrictions on development. Certain forms of development are appropriate in the Green Belt (i.e. agricultural buildings), however an agricultural building would 'encroach' on the visual amenity of the area, and as such would fail to comply with this policy. Alternative suggested wording 1) Only appropriate forms of development, in line with national guidance, will be permitted within the designated Green Belt areas.</p> <p>Policy CB17 - Criteria 5) of this policy requires all residential development within the settlement boundary to constitute the conversion or re-use of an existing building or brownfield land. This is overly restrictive, as precludes any non-brownfield site within the settlement boundary. The settlement boundary has been established to identify where future development is acceptable in principle. This extra restriction is not required. The plan includes a preference for brownfield development in any case. Alternative suggested wording, Remove criteria 5) from this policy</p>
Canal and River Trust	The plan area does not include any of the canal network and the Staffordshire and Worcestershire canal, whilst located to the north-west of the Plan area, is not in close proximity and would not appear to be significantly affected by the proposals within the Plan. Therefore the Canal and River trust have no comments to make.
Environment Agency	We note there do not appear to be any additional site allocations proposed within the Plan. We would only make substantive further comments on the plan if it were seeking to allocate sites in Flood Zones 2 or 3 (the latter being used as the 100 year climate change extent).
Highways England	<p>The NDP states that no specific sites have currently been identified by the Parish Council for housing and indeed no specific housing target figure has been provided. However it is noted that Policy CB17 sets out an emphasis for only small-scale infill development to come forward. As a result, Highways England can deduce that there will be no impacts on the SRN.</p> <p>Upon reviewing the Churchill and Blakedown Neighbourhood Development Plan submitted document, we can therefore conclude that the NDP does not conflict with any of our responsibilities to ensure the continued safe operation and functionality of the SRN.</p>
Historic England	<p><i>"Historic England is supportive of both the content of the document and the vision and objectives set out in it.</i></p> <p><i>The emphasis on the conservation of local distinctiveness and the protection of locally significant buildings and landscape character including important views is to be applauded. We also highly commend the approaches taken in the Plan to ensuring that the design of new development contributes to the conservation and enhancement of the historic environment".</i></p> <p>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.</p>
Natural England	Natural England does not have any specific comments on this neighbourhood plan.

Sport England	<p>Planning Policy in the <b>National Planning Policy Framework</b> identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Paras 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, '<b>A Sporting Future for the Playing Fields of England – Planning Policy Statement</b>'.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a></p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>If you need any further advice please do not hesitate to contact Sport England using the contact details below.</p>
Severn Trent Water Authority	No specific comments to make.
Worcestershire Regulatory Services contaminated land and air quality	No adverse comments.

Worcestershire Regulatory Services pollution and nuisance	No adverse comments.
--	----------------------