



## **Alrewas Neighbourhood Plan Submission Consultation Representation Form**

Alrewas Parish Council has submitted the Alrewas Neighbourhood Plan to Lichfield District Council. Under section 16 of the Neighbourhood Planning (General) Regulations 2012 Lichfield District Council are now consulting on the proposed Neighbourhood Plan and would like your comments. In order for your representation to be taken into account at the Neighbourhood Plan examination and keep you informed of the future progress of the Neighbourhood Plan your contact details are needed. **The closing date for representations to be made is 17<sup>th</sup> April 2015 at 17:15pm.**

**Please return your completed representation forms by the closing date via email to [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk) or by post to the following address;**

Development Plans & Implementation  
Lichfield District Council  
District Council House  
Frog Lane  
Lichfield  
Staffordshire  
WS13 6YY

All comments will be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Lichfield District Council in line with the Data Protection Act 1998.

**You can view the Alrewas Neighbourhood Plan and associated documents via <http://www.lichfielddc.gov.uk/alrewasnp> or hard copies of the documents are available in reception at Lichfield District Council.**

**Please complete the boxes below using a separate form for each representation:**

Name(s): Mr Philip G. Sharpe, Planning Officer
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Name(s) of Organisation (if applicable): Inland Waterways Association, Lichfield Branch
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Address (including postcode):
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Email address:
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Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan Proposal:

Yes  Y No

If 'Yes' is your preferred method of contact either via email or post?

Email  Y Post

Alrewas Neighbourhood Plan Representation Form

Please state which part of the Neighbourhood Plan (for example which section, paragraph or policy) your representation relates to:

Policies 5.2.1 and 5.2.5 and supporting text

Please use the space below to make comments on this part of the Neighbourhood Plan:

Please see attached Word document:  
Alrewas Neighbourhood Plan – IWA comments

Please continue on separate sheet if required

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## **ALREWAS NEIGHBOURHOOD PLAN**

### **Comments by Inland Waterways Association, Lichfield Branch – April 2015**

#### **Introduction**

The Inland Waterways Association (IWA) is a national charity which campaigns for the conservation, use, maintenance, restoration and development of the inland waterways for public benefit. The Lichfield Branch of IWA has considered the Alrewas Neighbourhood Plan in relation to the environment of the Trent & Mersey Canal and the interests of its users.

The Trent & Mersey Canal is a historic waterway and a valuable amenity and recreational corridor providing leisure boating, walking, angling, cycling and nature conservation benefits to the neighbourhood. It is designated a Conservation Area throughout for its special architectural and historic interest. The section of canal within Alrewas village is within the Alrewas Conservation Area.

IWA generally commends the plan for its recognition of the value of the canal through numerous textual references, photographs and several supportive policies. However, we are concerned that the suggested housing allocations in part conflict with these aspirations and could damage the environment of the canal around Bagnall Lock.

#### **Policies**

Policy 3.1 says “the canalside environment will be protected and enhanced”.

Policy 3.2 is a comprehensive policy for the canal recognising its historic, tourism and amenity value and requiring relevant developments to support additional tourist facilities. [But note correction to Canal and River (singular) Trust].

Policy 4.2 recognises the significance of the Trent & Mersey Canal within the Conservation Area and the need to enhance it and protect it from adverse effects of development.

Policy 4.6 designates a Local Green Space area alongside the canal within the Conservation Area north of the village, and another near to the canal west of the village.

All these policies are supported by IWA.

#### **Housing Allocations - West**

Policy 5.2.1 suggests up to 30 dwellings be allocated West of the village boundary but Policy 4.6 designates most of this area as Local Green Space leaving only 2 possible sites, both adjacent to the Trent & Mersey Canal. The capacity of these sites would be of the order of 30 houses and therefore, whilst supposedly eschewing site specific allocations (Section 13), the Neighbourhood Plan is in effect allocating these 2 sites.

#### **“The Doctor’s Field”**

The field between the canal and Kings Bromley Road, colloquially known as the Doctor’s Field, is currently the subject of a planning application (14/01103/FULM) for 10 houses but IWA has objected to this as damaging to the historic setting, rural environment and economy of the canal. Built development in the countryside adjacent to the canal system damages the rural setting of the canals

that contributes to their heritage interest, wildlife, amenity value and recreational use. The local rural environment of the canals plays a vital role in attracting and sustaining the recreational and tourism use of the whole canal system which helps fund its maintenance and contributes to the visitor economy.

This is a Greenfield agricultural site partly within the Alrewas Conservation Area and adjacent to the Trent & Mersey Canal Conservation Area, and lying outside the Village Settlement Boundary. The visual impact of the development would fundamentally alter and damage the historic setting of this part of the two conservation areas. It would dominate the surroundings of the historic Bagnall Lock and Bridge, the adjacent wharf and canal related cottage properties, and the attractive and well used visitor moorings on the canal.

The Alrewas Conservation Area boundary was clearly drawn to include part of this site to protect the setting of the Bagnall Lock area and the historic building formerly the Old Boat public house. The Alrewas Conservation Area Appraisal map highlights the panoramic view from the Kings Bromley Road approach to the village from the A513 and states:

9.6 “The open fields outside the Conservation Area boundary contribute to the setting of the Conservation Area as they are part of its character and reflect the village’s agricultural background. They also provide a definitive boundary, views in and out of the Conservation Area and contain sites of archaeological interest.” Housing development here would damage this setting and block these views.

The Appraisal also states:

9.5 “Any future development in the Conservation Area needs to preserve or enhance its character and appearance.” Development here would meet neither of these requirements.

Section 10 of the Alrewas Neighbourhood Plan references this assessment but fails to take proper account of its significance.

This field has also been the site for the Alrewas Canal Festival which would be lost by its development.

Designation of this site for housing would be contrary to Neighbourhood Plan Policies 3.1 and 4.2 as above and also Policy 4.4 by blocking important rural views both from and of the canal. Policy 5.2.5 which advocates the West Expansion Location refers to taking into account the important views into the Conservation Area but development here would be fundamentally inimical to that aim.

### **“The Horse Field”**

The field between the canal and the bypass, long used for grazing horses, is also a greenfield site adjoining the Trent & Mersey Canal Conservation Area. Its development would similarly impact the setting of the historic Bagnall Lock, bridge, wharf and cottage and also the canal visitor moorings. It would be contrary to the principles of the Alrewas Conservation Area Appraisal and Policies 3.1, 4.2 and 4.4 as above. Although within the Village Settlement Boundary it is isolated from the main built-up area by the cricket ground and public recreation open space and built development here would be a protrusion into the countryside.

Furthermore, this site is accessible only across Bagnall Lock Bridge 49 which is a narrow hump-backed bridge and unsuitable to take increased traffic. Its historic parapets could easily be damaged by the wide vehicles that would require access during construction work.

The Neighbourhood Plan identifies a need for additional amenity and open space areas for the village and it would be more appropriate for this field to be protected either as a future extension to the ‘Walkfield’ sports area or for other community open space use rather than be lost to built development.

## **Housing Allocations - North**

The main reason for the suggested West area designation seems to be that development to the North of Dark Lane is “strongly opposed by the community” (p39) but the reasons advanced against this forming the major part of the allocation are less than convincing.

The Dark Lane (former Essington House Farm) site is the subject of a current planning application (15/00120/FULM) for 121 dwellings which, after two amendments, now avoids the Conservation Area and the proposed Local Green Space, and the housing is some distance away and well screened from the canal, so IWA has no objections. This site alone could provide all the housing allocation for the plan period without the damaging sites west of the village, or indeed the isolated site east of the A38.

However, in Section 11 it is misleadingly said that “the north of the village”:

- “floods regularly”, but that area is beyond the proposed housing area;
  - “is adjacent to the canal”, but that area has been removed from the proposed housing area;
  - “is partly Conservation Area”, but that area has been removed from the proposed housing area;
- and it implies that access would only be from village side roads.

In fact, whilst still a Greenfield development, the proposed housing area on the North would be well screened from existing properties, have no significant impact on the Conservation Area or the canal, and have direct access to the main Burton Road road. Therefore, on any balanced planning assessment it must be concluded that the Dark Lane site is less damaging than development to the west.

## **Conclusion**

IWA concludes that whilst much of the Plan and the individual policies are commendable, the inherent contradiction of trying to accommodate local opposition to development at Dark Lane has led to confused reasoning, misleading statements and major inconsistencies between the policies and the proposed housing area allocations. In particular, the proposed development to the West is damaging and unacceptable and the reasons advanced for limiting development to the North are unconvincing.

IWA considers that the plan should be revised to recognise the relative merits of the amended Dark Lane proposals and to remove the suggested West side housing allocation.

Policies 5.2.1 and 5.2.5 and the supporting text should be changed to remove development to the West and to increase the indicative allocation of development to the North.