

SWLP Preferred Options Consultation Response

Alcester Town Council

General comments arising in relation to all identified sites within Alcester

While Alcester Town Council (ATC) considers there is a need for affordable and social housing in Alcester, the sites proposed would be inappropriate for the development envisaged by the SWLP for the following main reasons:

Public transport provision/ accessibility:

- Public transport in and around Alcester is severely lacking.
- There is neither a train station nor a train service near Alcester. The nearest stations are either Bearley (6.7 miles from Alcester) which is 60-80 minutes away by public bus or Wilmcote (6.5 miles from Alcester) which is 49 minutes away by public bus.
- The public bus service is typical of a rural location, with buses running approximately hourly and taking 31 minutes to get to the nearest main town, Stratford upon Avon (8 miles away).
- It takes 90 minutes to get from Alcester to Warwick Hospital and involves 3 different bus journeys.

Infrastructure:

Schools:

- The local primary and secondary schools in Alcester are at full capacity. Alcester Academy and St Benedict's are both Academy Schools, so the Local Education Authority, Warwickshire County Council, cannot force them to expand.
- Available information on school places indicates that the local Alcester Schools will be able to manage the existing population and the increase in demand once the allocated development sites have been completed (ie Alcester Park on Birmingham

Road), but not with the additional capacity that will be required of potentially 3,163 homes as envisaged under Spatial Growth Area 21 (Alcester).

Local NHS capacity:

- The local doctors' surgeries in Alcester are at capacity. The Infrastructure Delivery Plan (page 53 table 4.8) states there is a total of 12,544 patients registered at the two surgeries. There is a total of 5.34 FTE GPs making the average number of patients per GP 2349, exceeding the national average which is 2260 (*Source: BMA Pressure in General Practice data, updated January 2025*). Anecdotal evidence suggests it is difficult to get a routine appointment within 3 weeks. Adding thousands more dwellings to the area would exacerbate the challenges faced by local GP surgeries.
- The South Warwickshire University NHS Foundation Trust (Warwick Hospital) recently declared a state of critical emergency. On 8 January 2025, a press release on the hospital's website stated, '*Over the last week attendances at Warwick Hospital's Emergency Department have been consistently some of the highest we have ever experienced, and this is significantly impacting on the time patients are waiting to be seen.*' Adding an increasing population to Alcester puts further pressure on the local hospitals.
- No dentists in Alcester are taking NHS patients. The nearest dentist reportedly taking NHS patients in Warwickshire is 8.3 miles away in Stratford upon Avon.

Flooding:

- The River Alne and Arrow join on the outskirts of Alcester, and, when they have flooded, have engulfed part of the town. Alcester has flooded 22 times since 1864. The last major occurrences were in 1956, 1960, 1977, 1978, 1998, 2007 and in 2012. The flooding in 2007 was the worst flood event for 250+ years and when 200 homes were left uninhabitable.
- There have been 10 flood alerts in Alcester in the last 10 years, and 5 of these have been in the last 12 months. The latest one was 6 January 2025.

- In response to the severe flooding of 2007, an Alcester flood scheme completed an underground storage tank with a 3.25 million litre capacity in June 2011. However, the tank only gives 12 minutes' warning when it is full.
- The Strategic Flood Risk Assessment (October 2022) forming part of the SWLP Technical Evidence, highlights the considerable flooding issues experienced in Alcester from both pluvial and fluvial flooding. Table 6-2 provides details of the Environment Agency's flood defence assets which details the embankments and high ground/ walls that surround parts of the town as protection from the River Alne and River Arrow. The Standard of Protection for these defences is stated as 1 in 100 (p105, Infrastructure Delivery Plan). The status of these flood defence assets is currently unknown, but it is ATC's understanding that considerable work is required by the Environment Agency to improve the status of the assets as they have not had any significant investment since installation.
- Fear of flooding is the primary concern of residents as evidenced by ATC surveys. Alcester has established a Flood Group and coordinates Flood volunteers to carry out a flood action plan in the event of a significant flood event, including communicating with vulnerable residents or those living in areas previously flooded.
- With the exception of Site RefID411 and RefID512, the sites proposed for development absorb surface water and act as flood plains. Residents fear that development on the sites would increase the risk of flooding in areas already at high risk in Alcester, and further downstream.
- The built-up boundary provides very limited housing development opportunity with the flood plains being a major obstacle. Although there are a number of sites identified outside of SG21, the majority of these sites have scored highly due to flooding constraints – specifically the majority sit in Flood Zones 2 and 3 and are subject to surface water flooding.

Specific Comments regarding Spatial Growth Location – Alcester (SG21)

Site RefID 640 – Land west of Alcester

It is significant that the Interim Sustainability Appraisal by Lepus Consulting (December 2024) (hereafter referred to as the ‘SA Report’) indicatively ranks Alcester in 23rd place out of 24 as the worst performing strategic growth location option.

‘The Alcester SGL has been identified as being in the worst performing for flooding (SA Objective 2), biodiversity (SA Objective 3), landscape (SA Objective 4), cultural heritage (SA Objective 5), accessibility (SA Objective 11) and economy (SA Objective 13)’ (section 5.16.9).

The following information and evidence is provided by Alcester Town Council (hereafter ATC) to support this appraisal and provide further data for use in any future assessment. The same objectives identified under the SA Report have been used for ease of reference and consistency.

1. SA Objective 1- Climate Change – Plan objective to reduce the SWLP authorities’ contribution towards the causes of climate change.

- The site does not lie within the principle of the 20-minute neighbourhood.
- Any journey from SG21 to key facilities and services in Alcester via means of active travel (ie by foot or bicycle) would take significantly longer due to the requirement to traverse the A435 dual carriageway via a road bridge at Arrow or other similar location. For example, it would take an average of 39 minutes to walk to the nearest Health Centre.
- Short journeys are therefore likely to be made by car which would increase carbon emissions.

2. SA Objective 2- Flood Risk- Plan objective to plan for anticipated of climate change

- Considering the size of SG21, a significant proportion of the land would be at flood risk or adversely impacted.

- This is supported in the Appendices to the SA Report (B.3.3.3) that states Alcester is the second worst SGL for flooding, as *‘between 14 and 17% of SG21 boundaries lie within flood zones 2 and 3, and is also likely to result in negative impact of flood risk.’*
- 17% of the site is within Flood Zones 2 and 3 and a quarter of the site (24%) is in an area subject to surface water flooding. Development of SG21 would significantly increase the already high flood risk to adjacent land.
- The site includes Spittal Brook which is a watercourse serving the town which has a history of severe flooding. The route of Spittal Brook will therefore reduce the developable area within SG21.
- Such a large-scale development would create additional surface water run off that would adversely impact the Spittal Brook. The increased surface water run off would also place further pressure on blue infrastructure including drainage gulleys and culverts.
- NPPF (2024) provides that strategic policies should be informed by strategic flood assessments that consider the cumulative impacts in local areas susceptible to being affected by flooding. This guidance is reiterated in the SWLP Technical Evidence - Stratford upon Avon District Level 1 Flood Risk Assessment 2022.

3. **SA Objective 3-Biodiversity and geodiversity- Plan objective to protect, enhance and manage biodiversity and geodiversity.**

- NPPF (2024) guidance states that planning policies should contribute to and enhance the natural and local environment and seek to protect biodiversity and geodiversity.
- In 2018, ATC commissioned an Ecological Report for the Alcester Neighbourhood Development Plan – this report which is available here <https://www.alcester-tc.gov.uk/wp-content/uploads/2018/10/Alcester-Ecological-Report-Aug-2018.pdf>
This report identifies the distinctive habitats within SG21, in particular the areas of Ancient Woodland around Cold Comfort Wood and the intact hedgerows and veteran trees. This is such a large swathe of land that there are numerous reports of protected species within the site.
- The site is within 25m of a Local Wildlife Site and 27% of the site intersects with an area with baseline habitat score of 40-80. Section 5.4.4 of the SA Report considers

that SG21 is likely to result in ‘adverse impacts’ on Local Nature Reserves where these are located in close proximity.

- SG21 is located 0.5km from the River Arrow Local Nature Reserve and *‘has the potential for adverse impacts on [it], such as through increased footfall along the river, as well as potential harm to the quality of water from pollution associated with the development at this SGL.’* (section B.4.5.2 of the Appendices to the SA Report).
- The site is near to Ancient Woodland which has not been identified or assessed under the HELAA part A or B. Reference to Ancient Woodland is only made in the Appendices of the SA Report (section B.4.4.2) where Alcester is identified as being adjacent or in close proximity to stands of Ancient Woodland. Development at this location *‘has the potential to cause damage through increased levels of pollutants, worsening air quality and increased footfall from walkers and dogs.’* ATC further notes the provisions of Draft Policy 36 that considers Ancient Woodland to be a *‘locally important site and asset’* which would *‘fall to local plans to determine their protection.’* ATC further notes Draft Policy Direction 42 which has a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerow cover on-site. Ancient Woodland *‘must be retained on site unless there is a sound arboriculture reason not to’.*

4. SA objective 4 – Landscape- Plan objective to protect, enhance and manage the quality and character of landscapes and townscapes.

- The (1975) West Midlands Green Belt is a statutory green belt environmental and planning policy that regulates the rural space within the West Midlands region. Alcester is a designated ‘key inset area’ within the West Midlands Green Belt.
- 100% of SG 21 is located in Green Belt. Once the Green Belt is gone it is lost forever and ATC firmly believes that this Green Belt area should remain protected from development.
- The Green Belt prevents urban sprawl and towns merging and protects the countryside. It provides the physical separation between Alcester and Arrow. The proposed development would coalesce these communities and there would be no

buffer - which contradicts the NPPF (2024) that states one of the key purposes of the Green Belt is to prevent towns merging.

5. SA Objective 5- Cultural Heritage - Plan objective to Protect, enhance and manage sites, features and areas of archaeological, historical and cultural importance.

- ATC notes and strongly agrees with the statement contained in the ‘red’ scoring in the ‘Heritage and Settlement Sensitivity Assessment for Warwick and Stratford-on-Avon Local Plan’ contained in the Technical Evidence which states: *‘The range of heritage assets, which includes the scheduled Roman town, Alcester Conservation Area, the hamlet of Oversley Green, estate village of Arrow and Ragley Hall, makes development to the south highly damaging to the heritage assets.’* The reasons for this are explained further below.
- Alcester has a number of listed buildings within the settlement including:
 - i. 3 no. Grade 1 buildings
 - ii. 8 no. Grade 2* buildings
 - iii. 147 no. Grade 2 buildings¹
- Ragley Hall in Alcester is a building of historical interest (Grade 1 Listed Building since 1 Feb 1967). It is also listed under the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended, for its special architectural or historic interest.² The stately home would be adversely impacted by the proximity and encroachment of such a large development, which would be partly visible from the Hall. This is supported by the Appendices to the SA Report that states: *‘Alcester SGL is situated 10m from the Ragley Hall Registered Park & Gardens; although they are separated by the A422 there is still expected to be significant change to the surrounding landscape including through the loss of some countryside views.’*
- Besides Ragley Hall, there are a number of other significant historic sites in the Roman Town of Alcester. These include Alcester Abbey (considered to be a monastic

¹ Source: Heritage and Settlement Sensitivity Assessment for Warwick and Stratford-on-Avon Local Plan.

²https://mapservices.historicengland.org.uk/PrintWebServiceHLE/StatutoryPrint.svc/399342/HLE_A4L_Grade%7CHLE_A3L_Grade.pdf

site), the medieval complex of Beauchamp Court (itself identified as a potential development site under the SWLP (site IDRef 641), which is registered as a Scheduled Monument – ref no 1020035, ‘Beauchamp Court Moated Site’), and the Grade 2* Registered Park and Garden (including the sham castle of Oversley Castle).

- More than half of SG21 is within 500m of rural Listed Buildings. ATC notes that the Appendices for the SA Report identifies SG21 as coinciding with Grade II Listed Buildings where there is *‘potential for development to significantly alter the surrounding landscape setting and views of these heritage assets.’* Alcester SGL coincides with three Grade II Listed Buildings including ‘Cold Comfort Farmhouse’ and its associated barns (section B.6.3.4).
- The SA Report further states (section 5.5.1) that SG21 could potentially have an adverse impact on the landscape. Alcester lies wholly within the Arden Special Landscape Area, which is defined in the Appendices to the SA Report (B.5.4.2) as having *‘special qualities’*. SG21 could result in a potential major negative impact on the Arden Special Landscape Area, giving rise to potential changes to landscape character and views.
- To the east of Ragley Hall is the estate village of Arrow, which has a group of Listed Buildings and the park associated with Arrow Court. Ragley Hall and Arrow form a single conservation area. A development such as SG21 would adversely impact on the integrity of the conservation area in Arrow. SG21 is identified in the Appendices to the SA Report as being adjacent to the Arrow Conservation Area and as such any new development *‘is anticipated to impact their setting and surroundings.’* (section B.6.5.2).
- Part of the site is within 500m of a rural Scheduled Monument.
- NPPF (2024) confirms the importance of considering the impact of development proposals on heritage assets settings.

6. SA Objective 6 – Environmental Pollution- Plan objective to Mitigate adverse impacts from existing air, water, soil and noise pollution and to avoid generating further pollution.

- A development of this scale will lead to unacceptable impact on the countryside in terms of noise and light pollution.
- SG21 is located adjacent to the A435 dual carriageway. This proximity would expose site end users to significant noise and air pollution.
- The lack of public transport means new residents will be reliant on their cars. The potential for 3,163 additional dwellings will result in increased pollution due to car-based journeys, for both commuting to work and school and travelling to local key services and facilities.
- The scale of SG21 would significantly add to light pollution in the area. The location of the proposed site is highly visible from approaches coming to Arrow along the A422 from The Ridgeway and approaches coming to Alcester along the B4090 Alcester Heath Road.
- ATC further notes the potential detrimental impact on the bed and banks of the Spittal Brook watercourse which would affect the quality of the river water and its habitat and minerals.

7. SA Objective 7- Natural Resources- Plan Objective to Protect and conserve natural resources including soil, water and minerals.

- According to the Defra map showing Agricultural Land Classification, the whole area of SG21 is agricultural land of good quality - soil classification Grade 3. The majority of the area under consideration is farmed and cropped annually. The crops grown on the site contribute to UK-produced food supplies.
- 100% of the site is located within a minerals safeguarding area, resulting in an Amber score in the HELAA assessment results. The Appendices to the SA Report notes further that SG21 has the potential to adversely impact the minerals safeguarding area – identified as unconsolidated sand and gravel resources and areas of building stone (section B.8.2.2).
- Development of SG21 would result in the permanent loss of these resources.

8. **SA Objective 8- Waste- Plan Objective to Reduce Waste generation and disposal and support sustainable management of waste.**

- There are insufficient facilities locally to cope with the significant increase in waste production that would result from a residential-led development of the scale envisaged by SG21.

9. **SA Objective 9- Housing- Plan objective to provide affordable, high quality and environmentally sound housing for all.**

- While the principle of this objective is supported by ATC, the selection of the site for SG21 is both disproportionate and inappropriate.
- A development of the scale of the proposed SG21 would change the town of Alcester forever. It would result in a large residential 'urban extension' to a small market town. An expanded settlement would be split in two with a fast-moving dual carriageway (A435) or bypass running right through the middle.
- The population of the town would double – there would be a new community the equivalent size to the west of the existing Alcester settlement. Increasing the population of Alcester by 50%, with the added requirement of further development within Alcester, would significantly change the unique character of the town, as well as placing an additional strain on existing facilities.
- Integration of the two Alcester communities would be physically and practically challenging. Connectivity to the existing town would require significant infrastructure including bridges, tunnels and subways. Additional active travel links for pedestrians and cyclists would also be required at significant expense.
- Failure to significantly invest for the provision of additional facilities to service the scale of developed envisaged by SG21 would result in a disconnected and enormous housing estate (separated from the existing settlement by a dual carriageway) that neither relates or contributes to the existing town.
- There is no defensible boundary to the west of SG21 which could lead to continual pressure to extend westward.

- The extension would also consume into an enlarged urban area, the existing rural hamlet of Arrow. SG21 falls one third within the parish of Alcester and two thirds within the parish of Arrow & Weethley. Arrow is a proud historical village community outside of Alcester with its own identity.
- The development of SG21 would result in the community of Weethley being geographically isolated.

10. SA Objective 10- Human Health- Plan Objective to Safeguard and improve community health, safety and wellbeing.

- A number of comments have been made above regarding the existing pressure on local hospitals – namely the Alexandra Hospital, Redditch and the South Warwickshire University NHS Foundation Trust at Warwick. A further 3,163 dwellings would exacerbate this pressure.
- Furthermore, access by end users of SG21 to A&E providers would be well in excess of the target of 5km.
- A number of comments have also been provided above in relation to local GP surgeries and NHS dentists. GP surgeries in Alcester are at capacity and in excess of the average registrations at GP surgeries.
- There are a number of public footpaths running alongside and across SG21. Namely the AL506, AL50, AL180, AL149, AL201. These footpaths are essential access for the residents of Alcester to access the open countryside and embrace local nature and an area rich in biodiversity. Development of SG21 would result in the loss of these public footpaths. Even if they were retained, they would run through a large housing estate and their rural character would be lost forever.

11. SA Objective 11-Accessibility and Connectivity. Plan Objective to improve accessibility, increase the proportion of travel by sustainable modes and reduce the need for travel.

- Such a large development, located to the west of Alcester and physically separated from the town and all key facilities and services by a dual carriageway (the A435) would inevitably result in a dramatic increase in traffic. The increased commuting

journeys from school/ work would further exacerbate the transport issues. Journeys would be car-based and would not, therefore, meet the key objective of the SWLP.

- Traffic on the A46 and A435 is already above capacity. Significant and costly improvements would be needed to the arterial network to accommodate this increase in the population, including probably a bypass around Studley and dualling of the A46 to Stratford and beyond.
- There would be insufficient employment in Alcester for a further 3,163 households. This is supported by the Appendices to the SA Report which provides that Alcester is in proximity to only one small employment site, where access to employment opportunities is therefore more limited. This would result in additional commuting, leading to a significant increase in vehicular traffic through Alcester and on surrounding roads and villages as workers commute to Stratford upon Avon, Warwick, Birmingham and other significant centres of work and employment. Cars would be the preferred means of transport due to the lack of public transport in and around Alcester. Such a consequence makes SG21 environmentally unsustainable.
- There is no train station in Alcester or nearby.
- There is poor public transport from the centre of Alcester and none available in the proposed SG21 area.
- It is noted that the SA Report states (section 5.12.3) that Alcester is one of only 3 Strategic Growth Areas located where adverse effects on accessibility are expected.
- Significantly, section 5.12.4 of the SA Report and section B.12.5.4 of the Appendices provides: *'Alcester has been identified as the worst performing option for accessibility as [it] perform[s] poorly across all receptors. [This SGL is] not located within a sustainable distance to bus stops, railway stations or local services, [is] identified to have poor connectivity, and 43% of the site falls outside of any of the priority areas.'*

12. SA Objective 12- Education. Plan Objective to increase access to education and improve attainment to develop and maintain a skilled workforce.

- The Plan objective which is for residential development to be within 800m of a primary school is not deliverable within SG21. ATC notes that 0% of the SG21 is within 800m of a primary school. Journeys to school would therefore be by car, putting further pressure on local roads and parking provision.
- Alcester is stated to be an area where over half of the SGL area is within a sustainable distance to a secondary school, and wholly within a sixth form facility (B.13.4.5 of the Appendices to the SA Report). Specifically, 89% of the site is within 1.5km of an existing secondary school. ATC notes, however, that Alcester Grammar School is a selective school with a catchment extending 16 miles from the centre of Stratford. There is a live petition to encourage the Grammar School to reduce its catchment as local children are already struggling to find places at the school. Alcester Grammar School does not have the space to expand to create significant additional school places.
- More generally on secondary education, when the High School in Bidford was closed in the 1980's, it was envisaged that children from Bidford would go to secondary school in Alcester but due to the popularity of Alcester Academy and its constrained site, this is proving increasingly difficult. Any significant development in Alcester would make this even worse.
- For these reasons, ATC therefore strongly agrees with the Infrastructure Delivery Plan (January 2025) that states '*Alcester [...] is forecast to be full to capacity for several years.*' (p45)

13. SA Objective 13-Economy. Plan Objective to ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.

- The existing employment area for the town is located primarily at the Arden Forest Industrial Estate.

- The proposed site is located entirely in the Green Belt and adjacent to important Listed Buildings and the Conservation Area. To develop part of it for employment floorspace would severely impact on the setting and heritage value of these assets.
- Such development would also exacerbate road congestion on what is already a very heavy trafficked road network.

Without prejudice to the strongest possible objection to the proposed SG21, the extent of infrastructure required to accommodate such a large settlement would be cost and scale prohibitive. Alcester would need new highways – particularly a bridge with two lane access to a new development of potential 3,163 houses. The town would require a new doctor’s surgery, primary and secondary schools, a community centre, cemetery, shops, car parks, play areas and dedicated green spaces and new footpath routes.

The Town Council is firmly of the opinion that the development of SG21 would be inappropriate development of the Green Belt and that this site should be removed from consideration in the SWLP.

Summary comments on the identified sites around Allimore Lane, Alcester

- All of the sites around Allimore Lane have a rural aspect. They are sited on the edge of the town of Alcester, some distance away from the local amenities and facilities such as schools and doctors.
- Policy NE4 of the adopted Alcester Neighbourhood Development Plan protects Valued Landscape 4 which is located around Allimore Lane. The proposal to develop any of these sites conflicts with that policy.
- Any significant development of sites on Allimore Lane site will require another vehicle access route into Alcester. The bridge on Allimore Lane would be insufficient to carry significant additional traffic.
- Allimore Lane as currently used is shared between pedestrians and vehicles with no pavement. This works for the very limited amount of traffic using it at present but is not suitable if there is significant additional development. The narrowing at the bridge would preclude a pavement being constructed.
- All of the sites around Allimore Lane are Amber under the HELAA part A score and have a weighted constraint score of 9 because the land is currently greenfield.
- All sites around Allimore Lane have also scored Amber under HELAA Part A because 100% of all the identified sites are within a minerals safeguarding area.
- All sites have scored Amber on the basis all sites have a percentage of land that sits within Flood Zones 2 and 3 and are subject to Surface Water Flooding.
- An Amber score has been given for all Allimore Lane sites as they are all within 500m of rural listed buildings and within 500m of a rural scheduled monument.
- Furthermore, all the sites around Allimore Lane have an Amber score for sitting within 25m of a Local Wildlife Site.
- All Allimore Lane sites intersect 100% with an area with baseline habitat score of 40-80.
- There are a significant number of trees and groups of trees protected by Tree Preservation Orders on land adjoining Allimore Lane – thus recognising their significant contribution to the amenity of the area.
- Allimore Lane itself is part of the route of the historic Monarch's Way which is a 625-mile long-distance footpath that approximates the escape route taken by King

Charles II in 1651 after being defeated in the Battle of Worcester. The Monarch's Way runs from Worcester via Bristol and Yeovil to Shoreham, West Sussex, and is an approximation of the King's route using available public rights of way and visiting places noted in historic records.³

- Any development so close to this nationally recognised public footpath must be done very sensitively to avoid adversely impacting the amenity of the route.

With reference to the 'particular sites' around the Allimore Lane area, identified under the Preferred Options Consultation of the SWLP, ATC submits the following comments:

RefID 411- Land off Allimore Lane Also identified as RefID 837 North of Allimore Lane (comments included below apply equally to both site Ref IDs)

- This site has two site RefIDs – 411 and 837.
- Alcester Town Council (ATC) understands from the SWLP Team that Site RefID411 was submitted by a land promoter through the Call for Sites exercise, while Site RefID 837 was identified in the Site Allocation Plan (SAP) (Site REF: SCB.1), but that only one Site RefID should have been allocated.
- As noted above, this site was previously allocated for housing in the 2019 Site Allocation Plan and ATC was therefore aware of this site's potential.
- Access via Allimore Lane includes access over a small narrow bridge.
- Any access to the site would need to be made suitable.

RefID 445 – Land South of Allimore Lane, Alcester

- Some of this land is located in the parish of Arrow & Weethley.

³ https://en.wikipedia.org/wiki/Monarch%27s_Way

- There are significant flooding issues with this site – the HELAA Results and sites outcomes for this site state that 22% of the site is within Flood Zones 2 & 3 and is subject to surface water flooding. A significant amount of space around the flood zone is required.
- None of this site lies within 200m of a primary school.
- The site would fall outside of the ‘20 minute neighbourhood’ principle.
- ATC does not consider that this is 12.72 hectares of developable land.
- Public footpath AL49 runs across the site.
- The access road to this site would have to come off the A435 dual carriageway or Evesham Street which would be unviable.
- Access issues would be prohibitively expensive. It would not be possible to develop the whole of the site with only an access via Allimore Lane.
- The site contains a Valued Landscape location looking towards the bridge on Allimore Lane. Policy NE4 of Alcester’s current Neighbourhood Development Plan protects Valued Landscapes. Appendix 3 explains that preservation of Allimore Lane, which has little traffic and is extensively used by walkers, is important.
- 100% of this site is located in a minerals safeguarding area.
- 2% of this site is located within 500m of a rural scheduled monument and 19% is within 500m of rural listed buildings.
- 14% of this site is within 25m of a known or potential Local Wildlife Site.
- Furthermore, 100% of the site intersects with an area with a baseline habitat score of 40-80.

Site RefID – 810 South of Allimore Lane (west) Alcester.

- Similar issues are raised for Site RefID 810 as for the other Allimore Lane sites.
- The cumulative effect of development around Allimore Lane exacerbates the already challenging access issues with the road in its current state - with a small bridge that would be inappropriate for both construction traffic and significant daily vehicle traffic movements.
- The HELAA Results and sites outcomes for this site state 7% of the site sits in Flood Zones 2 & 3.

- 3% of the site is in an area subject to surface water flooding.
- The site would fall outside of the '20-minute neighbourhood' principle.
- The site is a considerable distance to the main area of Alcester Town, including the doctors and schools. It is a 30-minute walk to Alcester Academy (secondary school) and 0% of the site is within 800m of an existing primary school. It is a 24-minute walk to the Alcester Health Centre on Fields Park Drive.
- 100% of the site lies within a minerals safeguarding area.
- 6% of the site lies within an actual or potential Local Wildlife Site.
- 100% of the site intersects with an area with baseline habitat score of 40-80.

Site RefID 811– South of Allimore Lane (east) Alcester

- Similar issues as raised above for the other Allimore Lane sites.
- 29% of this site is stated under the HELAA Results and Sites Outcomes document to sit in Flood Zones 2 & 3.
- 18% of the site is in an area subject to surface water flooding.
- 100% of the site lies within a minerals safeguarding area.
- 14% of the site is within 500m of a rural scheduled monument.
- Only 1% of the site is within 800m of an existing primary.
- 15% of the site lies within 25m of a Local Wildlife Site.
- 100% of the site intersects with an area with baseline habitat score of 40-80.

In relation to the two further ‘particular sites’ identified under the Preferred Options Consultation of the SWLP, ATC submits the following comments:

Site RefID 512- The Moathouse, Birmingham Road, Kings Coughton Alcester

- The Moathouse Public House is a Grade II building, first listed on 11 December 1969.
- The key issues for this site include the importance of protection of the Listed Building, and the proximity of the site to a Local Wildlife Site and Green Belt.
- There are a number of Amber scores under HELAA part A for this site:
 - i. 100% of the site is in the Green Belt, so the HELAA A score is Amber. 21% of the site is in an area that is considered to make a moderate contribution to the Green Belt purposes.
 - ii. It is also a Greenfield Site.
 - iii. 25% of the site is subject to surface water flooding.
 - iv. The site is adjacent to Flood Zones 2 and 3 which scores another Amber.
 - v. 100% of the site is within a minerals safeguarding area.
 - vi. 100% of the site is within 500m of a rural listed building.
 - vii. 100% of the site is within 500m of a rural scheduled monument.
 - viii. 34% of the site is within 25m of a Local Wildlife Site.
- Other relevant information includes 100% of the site intersects with an area with baseline habitat score of 40-80.

Site RefID 641 – Beauchamp Court, Kings Coughton, Alcester

- 100% of this site lies within the Green Belt.
- 100% is within 500m of a rural Scheduled Monument- in fact over half of this site is a Scheduled Monument (Ref No 1020035, Beauchamp Court Moated Site). On this basis, ATC strongly considers that this site should not be considered for development as part of the SWLP.

- 100% of the site is within 500m of a rural listed building.
- 100% of the site lies within a minerals safeguarding area.
- A significant proportion of the site is within Flood Zones 2 & 3 or in an area subject to surface water flooding.
- 21% of the site is within 25m of an actual or potential Local Wildlife Site which gives it an Amber score on the HELAA A results.
- 100% of the site intersects with an area with baseline habitat score of 40-80.