



**BROMSGROVE DISTRICT COUNCIL**

**MEETING OF THE COUNCIL**

**WEDNESDAY 25TH SEPTEMBER 2013, AT 6.00 P.M.**

**THE COUNCIL HOUSE, BURCOT LANE, BROMSGROVE**

**SUPPLEMENTARY DOCUMENTATION**

The attached papers were referred to on the Agenda previously distributed relating to the above mentioned meeting.

**BACKGROUND INFORMATION ON RECOMMENDATIONS FROM THE CABINET - BROMSGROVE DISTRICT PLAN 2011-2030 - REPORT ATTACHED APPENDICES 1-4 ARE AVAILABLE ON THE COUNCIL'S WEBSITE AND IN THE MEMBERS' ROOM. COPIES WILL ALSO BE AVAILABLE IN THE COUNCIL CHAMBER. (Pages 1 - 714)**

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17th September 2013

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## Housing Growth Consultation – Consultation Responses

## Appendix A - updated

### Site 1 – Foxlydiat (Area 4) - OBJECTION

KEY ISSUE: Biodiversity/ Natural Environment

<b>Sub Issues</b>	<b>Officer response</b>
<p>Habitats for flora and fauna will be destroyed and would be damaging to rare breeds i.e. natterer and pipistrelle bats, avocets, great crested newts, orchids, skylarks, mallards, badgers, pheasants, honey buzzards, common buzzards, swallows, green woodpeckers, greater spotted woodpeckers, goldfinches, nuthatches, cuckoos, starlings, fieldfares, barn owls, sparrowhawks, Dormice, grass snakes, hares, rabbits, Curlews, Chiff Chaffs, kestrels, Meadow Pipits, partridge, redwings, Partridges, Plain White Doves, Bullfinches, swallows, herons, hares, water voles, shrews, trout, butterflies, Osprey, Goldcrests, Little Owls, Tree Creepers, Kestrels, Swifts, Jays, House Martins, Swallows, Skylarks, Sedge Warblers, Great Tits, Whitethroats, Willow Warblers, Long Eared Owls, Scandinavian Redwings, Robins, Fieldfare Red Kites, Egrets, Long Tailed Tits, Quail, Oyster Catchers, Blue Tits, Wood Warblers, Yellowhammers, honey bees, Nuthatch, moths, deer and otters (EU directive (Annexe IV) council directive 92/43/EEC on conservation of natural habitats and of wild flora and fauna).</p> <p>Area 4 is an important wildlife corridor between neighbouring copses/woods which if lost would leave isolated pockets of unsustainable wildlife.</p> <p>Biodiversity sightings – photographic evidence submitted by E Morris and saved on Joint Shared Drive</p> <p>Birdlife will be affected with the removal of hedgerows</p>	<p>Before development commences and an application is approved a habitats survey and protected species survey will be completed to the appropriate standards, in accordance with relevant legislation. This will inform the master planning of the site in order to maximise opportunities for biodiversity and recreation and mitigate the effects of development on biodiversity such as planting to encourage natural foraging, artificial bat roosts etc</p>
	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure. This should include a hedgerow assessment, determining which hedgerows are worthy of retention and protection.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>The imposition of large amounts of street and house lighting, the disturbance and noise of cars etc. Low level lighting must be installed to reduce energy consumption and light pollution.</p>	<p>Planning Conditions assigned to planning applications can minimise impact during the construction phase. There will be an imposition but design of development informed by a habitats survey can mitigate against long term impacts.</p>
<p>Foxes will be forced into houses spreading disease or injury to the public</p>	<p>This is not an issue that determines if this location is better/ worse than another.</p>
<p>Following lane widening to accommodate increased traffic flows, further widening would be required to accommodate new ditches, which would impact on the native hedges and would change the rural character of the area</p>	<p>Specific road layouts are not known yet, detailed analysis will be completed, however a hedgerow assessment should determine which hedgerows are worthy of protection and retention. It is inevitable given the scale of development that the rural character of the area will change</p>
<p>It is stated that sites will have a "Strategy and Management Plan for green infrastructure which maximises opportunities for biodiversity and recreation." How can building 2800 houses maximise biodiversity and recreation, if you want to "maximise" it don't build in the first place.</p>	<p>It is essential that houses are delivered to meet Redditch need alongside this it is important to incorporate the existing natural environment as much as practicable. In order to achieve this a suitable strategy must be in place.</p>
<p>Development will result in the loss of important trees</p>	<p>An ecological assessment will need to be completed which includes tree and hedgerow analysis, this would need to be submitted as part of any planning application. The protection of trees will be dealt with through the application process and any removal of trees to enable development will be kept to a minimum.</p>
<p>Cannot "protect...the distinctive character...natural and historic environment" if undulating ridge and furrow fields developed and TPO hedges/trees removed</p>	<p>NPPF guides local planning authorities to meet their objectively assessed housing needs. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. The protection of trees will be dealt with through the application process and any removal of trees to enable development will be kept to a minimum.</p>
<p>Threats to destroy a large tract of beautiful and valuable countryside in complete conflict with Objective 9</p>	<p>It is not possible for one element of development to fully meet all 13 Objectives, the development plan aims to balance the 13 objectives overall. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the</p>



Sub Issues	Officer response
<p>When developing at the density required to provide the housing will not be possible to show any significant sensitivity to the valuable natural habitats that we know exist within the area</p>	<p>built form of Redditch and cause least harm to the Green Belt. The HGDS paragraph 3.45 states, “A density of 30 dwellings per hectare (dph) was used to calculate area capacities. The majority of existing development in Bromsgrove and Redditch is relatively low density and therefore at this density it is possible to provide a realistic figure with a proportion of areas likely to exceed 30 dph. Using the figure of 30 dph ensures that housing potential is not overestimated and as a result the combined total of developable areas can be viewed as a minimum.”</p> <p>The extent of Site 1 has a greater capacity than required for 2800 dwellings; this is to allow for natural habitats and green infrastructure to be an integral part of the scheme.</p>
<p>Bow brook identified by Environment Agency as failing to meet “good ecological status” as required by the Water Framework Directive.</p>	<p>It is not for any new development to rectify any existing problems as long as it does not exacerbate them. A habitats survey and protected species survey will be completed to the appropriate standards, in accordance with relevant legislation. Any application for development will be dealt with in consultation with the Environment Agency.</p>
<p>The “Norgrove” section of Swans Brook that goes as far as the Ford on Pumphouse Lane is an “Area of Wildlife that is of County Interest”. The section of Swans Brook that leads from the Ford to the Pumping Station at Curr Lane and beyond, should also be considered a site of equal “County Interest”. It is a watercourse worthy of protection and enhancement</p>	<p>It is not clear where this quotation is taken from, the Worcestershire Biodiversity Partnership Rivers and Streams Action Plan makes reference to improvements along Bow Brook and other watercourses but does not refer to Swans Brook.</p>
<p>As the more recent survey has revealed higher grading in the Foxlydiat area, than the original pre-1988 survey, Redditch and Bromsgrove Planning should confirm the current grading quality of Area 4 before considering as potential building land</p>	<p>Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. It is considered that the quality of agricultural land is a minor constraint to development.</p>
<p>Emphasise the importance of the Swans Brook LWS and anticipate that upstream sections of the brook (which fall within this site) and additional smaller watercourses which feed into it will need the same degree of protection and buffering as the LWS. The housing numbers proposed (2870) may need to be reduced in light of further detailed evidence</p>	<p>The extent of Site 1 has a greater capacity than required for 2800 dwellings; this is to allow for natural habitats and green infrastructure to be an integral part of the scheme. An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.</p>

<b>Sub Issues</b>	<b>Officer response</b>
Proposed Growth Option 1 (Areas 1, 2 and 3) has overall, the fewest potential ecological constraints to development, whilst areas to the north-east of the A448 and west of the A441, potentially have the most.	An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
No over-riding ecological constraints have been identified from the initial survey work and evidence reviewed to date.	Noted, an ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
Development affords significant opportunities for improving biodiversity through change of land use and incorporation of ecological enhancements, which will accord with national and local planning objectives and aims of the UK and Worcestershire BAPs.	Agreed, the policy is aiming to ensure that where there may be losses to biodiversity that there are opportunities taken for mitigation against that loss and improvements elsewhere around the site.
There should be scope to retain important existing hedgerows within the area and to strengthen boundary treatments around the peripheries.	The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure. This should include a hedgerow assessment, determining which hedgerows are worthy of retention and protection.
The area is not subject to any statutory or non-statutory nature conservation designation	Noted.
There are no scheduled ancient woodland within the area. The nearest area of ancient woodland, Hennal's Wood	Noted.
Area dominated by grassland, which largely exhibits a limited species composition. One arable field is in the area but due to intensive management, few if any other plant species present. Edges of the field have limited species diversity colonising from adjacent grassland.	An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
Height, structure, species composition and management hedgerows varies, although generally dominated by native shrub species, often with semi-mature to mature standard trees, with several potential veteran trees present.	Noted.
Habitats relatively common in the local area and are unlikely to be of greater interest than similar habitats in the wider countryside	An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
Habitats that represent better examples of BAP priority habitats could be readily retained within a sensitively designed masterplan, potentially as wildlife corridors within Green Infrastructure.	The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure. The BAP will be taken into consideration and an ecological survey will

Sub Issues	Officer response
<p>There is opportunity to retain, protect and enhance habitats/ features of greatest ecological value and incorporate within development managed for the benefit of biodiversity and recreation in accordance with the NPPF and Local Plan policies B(NE).1 and B(NE).3, and Revised Draft Core Strategy policies 2 and 5.</p> <p>Opportunity to expand existing woodland, through native woodland planting, providing long-term buffers to retained woodland and space for species to expand their range. Opportunity to secure a long-term program of positive management of existing woodland areas would be available.</p>	<p>be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.</p>
<p>Change in land use due to development would benefit ponds and off-site watercourse, as these habitats/ features would no longer be subject to run-off from agricultural fertilisers/ chemicals.</p> <p>North western sector of Area 4 is the least suitable for development of those selected in the HG document as it has "more than 60%" chance of being "Best and Most Versatile" land, is open and obviously well-cultivated, is part of HECZ 147b whereas other two sectors are part of 146c</p>	<p>Any application for development will be dealt with in consultation with the Environment Agency. The development will be required to not exacerbate any problems downstream.</p> <p>The quality of the land is one consideration, there are other considerations such as high ridge lines which may determine areas within the site that are less suitable for physical development, however this site boundary chosen presented the strongest defensible boundaries in Green Belt terms.</p>
<p>Proximity of fields and trees is known to be beneficial to mental health/well-being, cannot 'improve quality of life and sense of well-being'</p>	<p>NPPF guides local planning authorities to meet their objectively assessed housing needs. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. The intention is not to build houses without integrating the natural environment element. The Policy states that <i>"the sites will have an overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity."</i></p>
<p>'Protecting' existing habitats... landscape geodiversity' - by building over the top/changing topography?</p>	<p>It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.</p>

KEY ISSUE: Flood Risk

Sub Issues	Officer response
<p>Development will impact on Bow Brook and tributaries that run into Norgrove Pool, Elcocks Brook, Shell Brook. The Bow Brook floods regularly with water flooding into gardens.</p> <p>If you decide that urban extension has to take place in these areas, it is essential that substantial mitigation measures, such as holding tanks, are included in the conditions for development.</p> <p>Soil erosion on farmland. Rivers and water courses cannot cope with further surface water from proposed developments.</p>	<p>PPS 25/ NPPF requires that surface water run-off cannot be higher than the greenfield site at present, and should aim to improve current rates.</p> <p>A flood risk assessment of the site will determine how this can be achieved for this site but it should be noted that there is no objection in principle from the Environment Agency.</p> <p>Soil erosion is not known to be a significant issue in this location. As surface run-off should not increase as a result of development this concern should not be exacerbated.</p>
<p>Concern localised flooding will be magnified. Potential for flooding at Feckenham. Concern over previous flooding effects on Droitwich Spa, Salwarpe, Droitwich Canal Basin, Vines Park in Droitwich, Huddington, Shell and Himbleton. In terms of the 'Bromsgrove District and Redditch Borough Strategic Flood Risk Assessment Level 1 Draft Report' (September 2008) by Royal Haskoning – Lack of information supplied where towns and villages downstream of the River Salwarpe and the Bow Brook have been flooded in 2007. Concerns related to storm and surface water run-off from the proposed development into lower field and property (Holyoakes Farm, Holyoakes Lane) and into the surrounding roads and into the brook which is already under pressure. The building of the A448 and the subsequent "landscaping" of the excavated subsoil from the new road along the adjacent field edges creating the ridges mentioned in your report, led to significant and on-going water management issues downhill<sup>4</sup>.</p>	<p>A Site Specific Flood Risk Assessment (FRA) will need to address downstream effects of development. A FRA will take account of flooding from all sources and historic flooding.</p> <p><b>ACTION: Ensure a Site Specific Flood Risk Assessment request is included in either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</b></p>
<p>Part of the proposed area is criss - crossed by a stream, regularly in flood and contains a spring with a pool. The land slopes and is wet and boggy.</p> <p>Gypsy Lane in area 4 suffers from some very specific flooding</p>	<p>A Site Specific Flood Risk Assessment (FRA) will consider areas at risk and appropriate mitigation measures will be employed. The draft policy requires that surface water run-off is managed to prevent flooding on and around the site through the use of Sustainable Urban Drainage Systems (SUDs).</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>problems related to earlier development i.e. the building of the A448 in the 1970s, and suffers from considerable run off not just of water but also silt (land erosion).</p> <p>High concentrations of clay with lower layers of blue and orange indicating longstanding waterlogging.</p> <p><sup>4</sup> Flooding in Holyoakes Lane outside Holyoakes Cottages, flooding through the interior of the longbarn at Holyoakes farm and flooding within the yard and gardens of Holyoakes Farm</p> <p><sup>5</sup> Environment agency "Factors that affect erosion and run off "Steep fields can cause water to run off at a rapid rate. This is particularly the case where water percolation into the soil is slow. Highest risk are those fields at 7 degrees. Water will pond when it reached a flat area.</p> <p>Photographic evidence submitted by J Godwin and saved on Joint Shared Drive</p>	
<p>Basic infiltration systems for surface water management will not work in this area due to the heavy clay.</p>	<p>Agreed, there are alternative SUDs methods that can be used which do not use infiltration techniques.</p>
<p>Flooding has increased since the completion of the Priest Bridge sewage treatment works and since additional houses were last built in Redditch within this catchment area.</p>	<p>A FRA will take account of flooding from all sources and historic flooding.</p>
<p>Run-off, flood water and ground water to Feckenham is likely even with attenuation reservoirs.</p>	<p>PPS 25/ NPPF requires that surface water run-off cannot be higher than the greenfield site at present, and should aim to improve current rates. A Site Specific Flood Risk Assessment (FRA) will need to determine how this can be achieved for this site. This assessment will also address downstream effects of development. A FRA will take account of flooding from all sources and historic flooding.</p>
<p>Provision of Spill Ponds (attenuation reservoirs able to contain 100 year storms), gravity flooding will be controlled. Due to congestion, annual blockage by detritus, the local high water table and blockages in the connecting network, relying on this method of flood control will result in a much higher likelihood of flooding downstream in</p>	<p>A Site Specific Flood Risk Assessment (FRA) will need to be completed for this site. This assessment will also address downstream effects of development. Drainage mitigation measures will be incorporated within the site specific FRA as will any potential for downstream pollution.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Feckenham. What specific safeguards are being implemented to alleviate this situation?</p>	<p>Any application for development will be dealt with in consultation with the Environment Agency. The development will be required to not exacerbate any problems downstream.</p>
<p>Surface water run-off from Great Hockings Lane pollutes the Norgrove fishing pool</p> <p>May be issues with overland inundation during overland flooding due to the close proximity of the Bow Brook and nearby sewer</p>	<p>PPS 25/ NPPF requires that surface water run-off cannot be higher than the greenfield site at present, and should aim to improve current rates. Drainage mitigation measures will be incorporated within the site specific FRA as will any potential for downstream pollution. Any application for development will be dealt with in consultation with the Environment Agency.</p> <p>A flood risk assessment of the site will determine how this can be achieved for this site.</p>
<p>Environment Agency concerns needs to be addressed as a priority before any development is commenced</p>	<p>Agreed.</p>
<p>Site 1 mainly located on a Principal Aquifer. It forms part of the Warwickshire Avon Permo-Triassic Sandstone South groundwater body. This groundwater body is at good chemical status and poor quantitative status. This means that the quality of the groundwater is good however, the aquifer is over-abstracted and this has caused problems with low flows in the watercourses that should be supported by baseflow from the aquifer. Source Protection Zones (i.e. SPZ 1, 2 and 3) cover part of the area relating to Severn Trent Water Ltd's public water supply boreholes.</p>	<p>It is not for any new development to rectify any existing problems as long as it does not exacerbate them. A site specific Flood Risk Assessment will be completed to the appropriate standards, in accordance with relevant legislation. Any application for development will be dealt with in consultation with the Environment Agency.</p>
<p>The site is not within a flood plain and is classified as Flood Zone 1 therefore satisfies requirements of the Sequential Test.</p>	<p>Noted.</p>
<p>Risk of groundwater and surface water flooding is low across most of the site. May be localised susceptibility in central and north-west areas, but this can be managed and is not a significant impediment to development</p>	<p>Noted.</p>
<p>Following development, overall impermeable areas are expected to increase, but there no reason to suggest that a scheme for provision and implementation of a surface water regulation (attenuation) system cannot be agreed with relevant Authorities</p>	<p>Noted.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Some areas of southern portion of the site are within the Inner and Outer Source Protection Zones (Zones 1 and 2) associated with the boreholes. Construction method statements will be necessary for works within these zones its not anticipated that the boreholes will create a significant constraint. To the contrary, removal of agricultural land and the associated use of fertilizers close to a water abstraction borehole could be beneficial</p>	<p>Noted.</p>
<p>A water main crosses the southern portion of the site from north-east to south-west. The main is 450mm diameter and sits within a ten metre wide easement. It is anticipated to be a substantial supply main serving the Redditch area and diversion is not considered to be a viable option.</p>	<p>Noted.</p>
<p>A preliminary flood risk screening report prepared by Argyll Environmental identifies parts of the site as being susceptible to ground water flooding, albeit it also identifies a similar susceptibility for the whole of Webheath and there is no documentary evidence to support such an assessment.</p>	<p>A Site Specific Flood Risk Assessment (FRA) will need to be completed for this site.</p> <p>Any application for development will be dealt with in consultation with the Environment Agency. The development will be required to not exacerbate any problems downstream.</p>
<p>An application to Severn Trent Water for an area-wide modelling exercise to establish likely reinforcement works has been submitted. Irrespective of outcomes, it is probable that reinforcement works will be carried out on a phased basis</p>	<p>Noted.</p>

**KEY ISSUE: Green Belt**

<b>Sub Issues</b>	<b>Officer response</b>
<p>Little consideration has been given to the erosion of the "green belt"</p>	<p>The Housing Growth Development Study (2013) has undertaken broad and focussed appraisals of the Green Belt around Redditch considering the purposes of including land in the Green Belt in accordance with the National Planning Policy Framework (NPPF).</p>
<p>Development would cause significant impact on Green Belt. The proposed development is on Green belt and should not be considered on those grounds alone.</p>	<p>The sites that have been proposed have been assessed to have the least impact, with the best long term boundaries.</p>

Sub Issues	Officer response
<p>There is an implication of "sprawl". The proposed development area is within a few hundred meters of Tardebigge, which is just a few miles from Finstall, which almost is connected to Bromsgrove; this would have an impact on the South/West elevation from the A448.</p>	
<p>Development in Area 4 will coalesce with Bentley The area will lose the strong green belt boundary, the A448, leading to the potential of further development and sprawl into the surrounding countryside.</p>	<p>The A448 is not a Green Belt boundary so it would not be lost as a result of these proposals</p>
<p>If this development is allowed on this land will that allow me to knock down my barn and build 20 affordable houses to contribute towards the so called cause? I am bound by the rules enforced by yourselves and so should you be bound by the same rules.  Having been refused planning for a two-storey side extension at this address based on that being considered inappropriate development in Green Belt, I find it inconceivable that the development of Site 1 (Area 4), only 300m from this location, could in any way be deemed appropriate development of Green Belt. Surely the standards by which Bromsgrove Planning have previously ruled would determine that development of this area in this way must be rejected.</p>	<p>Any proposed sites would be taken out of the Green Belt. If a site is within the Green Belt it would be subject to separate planning application and assessed on its merits.  The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.  20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>The plan clearly states that Green Belt land should only be developed in extreme circumstances then goes on to state that Green Belt Land has been designated as suitable for development.  Another intrusion into the Green Belt. This must stop or be controlled very carefully before we have no Green Belt left around Redditch.</p>	<p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.  20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>Document used for determining the preferred area refers to strong boundaries to prevent future sprawl, this is irrelevant as there are</p>	<p>It is agreed that existing boundaries such as Foxlydiat Lane are strong. However, insufficient land supply in the Borough necessitates</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>extremely strong existing boundaries such as Foxlydiate Lane which are being overridden. There is nothing in current policy which prevents the new boundaries being dealt with in the same way as the sprawl continues into additional green belt areas.</p> <p>How could the proposed development not be considered 'urban sprawl'?</p> <p>Risking allowing housing to continue to sprawl into the wider countryside</p> <p>Boundaries mostly weak with no topographical feature to strengthen them. Strongest boundary is the A448 with the rest comprising narrow country lanes, broken hedge lines and a stream.</p> <p>Proposed boundaries require strengthening, yet the site is still supported. Other sites are criticised for poor defensible boundaries and later discounted. This does not demonstrate a balanced approach to the assessment of each area.</p> <p>The conclusion states that the proposal 'uses strong and defensible Green Belt boundaries', yet the previous section highlighted weaknesses with the boundaries.</p> <p>Foxlydiate included in the Green Belt to "contribute to the open character of the corridor between Redditch and Bromsgrove".</p> <p>BDC Draft Core Strategy 2 paragraph 7.202 Core Policy 22 Green Belt – why has this not been applied?</p> <p>'Redditch Green Belt Release to Meet Growth Needs' – Jan 2013 Para 3.71 continues under E. Development of Green Belt sites should generally be phased late in the plan period after further investigation as to whether they constitute the most sustainable form of development in the local area and represent exceptional circumstances.</p>	<p>the need to use Green Belt land to meet development needs and to reassess existing boundaries.</p> <p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p> <p>The western site boundaries comprise a tree-lined watercourse and Cur Lane, which are both considered to be strong boundaries for analysis purposes. Two weak boundaries offer good connectivity between strong boundaries such as Cur Lane and the A448 to enable a suitable development area to be identified.</p>
	<p>Development in this location would have a less significant impact on the Green Belt 'Strategic Gap' than development in other locations north of the Borough.</p> <p>This is draft policy which will form part of a revised district plan alongside the housing growth proposals for Redditch, This policy clearly states "There will be a presumption against allowing inappropriate development in the Green Belt. Permission for the development of new buildings in the Green Belt will not be given, except in very special circumstances." The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough is considered to constitute an exceptional circumstance which</p>

Sub Issues	Officer response
	<p>necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p> <p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p> <p>Although development on Green Belt land should generally be phased later in the Plan period, it is not possible to delay the development of the cross boundary sites until all of the sites in Redditch are developed as Redditch does not have a five year housing land supply without taking cross-boundary development in to account.</p>
<p>HGDS doesn't demonstrate it has taken account of 'Redditch Green Belt Release to Meet Growth Needs' – Jan 2013. Para 2.22 applies to Area 4 but it can be argued that this can be more clearly demonstrated in other examined Areas (also paras 3.71 – 'exceptional circumstances, 3.80 &amp; 3.81 - Greenfield sites should not be brought forward ahead of need')</p>	<p>The Redditch Green Belt Study only considered Green Belt land within the Borough and not the cross-boundary growth areas. Where this Study indicated that Green Belt land within Redditch may be suitable for development, it also identified that land cross-boundary might offer more appropriate and defensible Green Belt boundaries. It was therefore the purpose of the HGDS to identify these boundaries.</p> <p>Although development on Green Belt (or greenfield) land should generally be phased later in the Plan period, it is not possible to delay the development of the cross boundary sites until all of the sites in Redditch are developed as Redditch does not have a five year housing land supply without taking cross-boundary development in to account.</p>
<p>Part of the area could merge with Tardebigge to the north and Banks Green and Upper Bentley to the west.</p> <p>North western and south western 'wings' of Site 1 very intrusive into the Green Belt, the former causing coalescence risk with Tardebigge and Bromsgrove and both representing uncontrolled sprawl and unacceptable encroachment into the countryside.</p>	<p>The extent of Site 1 does not merge with Tardebigge, Banks Green or Upper Bentley.</p> <p>The proposed alterations to the Green Belt boundaries offer strong defensible features such as the tree-lined watercourse, which would not be easily breached and will endure beyond the Plan period.</p>

Sub Issues	Officer response
<p>Impact on Tardbigge is dismissed on the weak basis that the village does not have a defined settlement boundary or village envelope, despite having a clear identity as a community</p> <p>Land north of the public footpath was considered in the 2009 RPS/FPCR Study. Concluded it would have more impact on wider countryside than land south to Foxlydiate Lane. Would reduce open gap between Redditch and Bromsgrove from 4.8km to 2.8km, introducing greater coalescence and increasing perception of unrestricted sprawl.</p>	<p>Proposing a Green Belt boundary along the PROW would not have allowed sufficient land to be identified to meet growth needs. However, the extent of Site 1 has a greater capacity than required for 2800 dwellings; this is to allow for natural habitats and green infrastructure to be an integral part of the scheme and for strong defensible Green Belt boundaries to be established.</p> <p>Development in this location would have a less significant impact on the Green Belt 'Strategic Gap' than development in other locations north of the Borough.</p>
<p>Councils' Study failed to assess Green Belt harm. Claiming harm is potentially less than significant in comparison with many others due to the potential to create defining long term boundaries, merely on the basis of appropriate buffers being retained (para 5.68). This weak assessment of harm is backed up by weak assessment that accessibility is good, despite being 4.7km from Redditch Town Centre and 5.5km to the nearest industrial estate.</p>	<p>Para 3.30 of the HGDS states "A key component of the 'Focused Area Appraisal' was the assessment of the Green Belt as well as the defining of appropriate boundaries for each of the potential development areas. The methodology to assess land against the Green Belt purposes and to select defensible boundaries has been derived from an evaluation of other best practice assessments." This approach was consistent for all Focused Area Appraisals.</p>
<p>What are the defining features? Why are they not detailed? The site will be visible from the south and from the Bromsgrove Highway so good containment not possible from the north</p>	<p>Distance to the Town Centre and employment areas is not the only determining factor when identifying development locations.</p> <p>Defining features comprise a tree-lined watercourse, ridge lines and Cur Lane, for example. All of which are considered to be strong boundaries for analysis purposes, and would not be easily breached and will endure beyond the Plan period.</p> <p>Visible features such as high ridge lines may determine areas within the site that are less suitable for physical development.</p>
<p>Cur Lane an ideal boundary to check urban sprawl, yet in the focussed appraisal for Area 8 (Bordesley), the use of Storage Lane as a boundary is frowned upon, why the differing opinions when both should be equally judged for this purpose?</p>	<p>Area 8 has not been identified as a preferred location for development. Storage Lane is a strong enough boundary in Green Belt terms but the extent of development would be more than is required before it reaches Storage Lane. The HGDS has identified</p>

Sub Issues	Officer response
	that there is a lack of strong defensible boundaries south of Storage Lane. Furthermore, development at Bordesley would have a greater impact with respect to 'strategic gap' reduction to the conurbation than development elsewhere.
Extensive negative aspects in the documents conclusion are forgotten by the last paragraph.	HGDS para 10.2 states <i>"All of the areas are in the Green Belt and all of the areas have constraints and strengths. No area is perfect or ideal. The choice that has to be made therefore is on the basis of the area(s) which most sustainably deliver the required amount of development and associated infrastructure with the least negative impacts"</i> .
Boundaries, particularly man made ones (roads and hedge lines) are defensible only for as long as one wants them to be. Question whether emphasis on these factors deflects attention from the location and nature of the land itself and the development's impact on the surrounding Green Belt.	HGDS para 3.30 states <i>"The methodology to assess land against the Green Belt purposes and to select defensible boundaries has been derived from an evaluation of other best practice assessments."</i> Roads and hedgerows are considered to be strong defensible boundaries in best practice assessments.

KEY ISSUE: Historic Environment

Sub Issues	Officer response
Impact on Norgrove Court (Grade I listed)	Norgrove Court is located about 750m south of the boundary with site 1. There is a strong Green Belt boundary at the south of Site 1 along Pumphouse Lane. It is considered that impact to Norgrove Court is negligible.
Medieval Ridge and Furrow Fields systems still intact.  Archaeological surveys have found evidence of medieval field systems, ridge and furrow, crop circles and ancient fishponds.	While part of the historic environment, Ridge and Furrow is not considered to be of such significance to be a constraint to development unless it is associated with scheduled remains. However prior to any development being approved, such remains would be fully assessed and recorded, and where deemed to be of significance would be preserved in situ as part of the developments Green Infrastructure provision.
Report does not mention that the whole of area 4 identified for development is within the bounds of the historic Royal Forest of Feckenham and is an area asserted by Bordesley Abbey in the 13th century. The preferred area for development within area 4 sits	Reference to survey work on HE and archaeological assessment to the standards required by WCC would be advantageous.  <b>ACTION: Include reference to the Historic Environment</b>

<p><b>Sub Issues</b></p> <p>between the Bordesley granges of Hewell and Sheltwood and was itself a grange of Bordesley<sup>10</sup>. The manor of Tuneshale<sup>11</sup> noted in the perambulations of Feckenham Forest in 1280 incorporated an enclosed court and is believed to be located in the vicinity of Holyoakes Farm, as is Eahmund's Burial ground (see footnote). Holyoakes farm is not listed but is a half-timbered house with timber dating back to the late 1500s and gentrified sometime around 1830 when a brick surround was added. Recent archaeological investigations at Holyoakes Farm have unearthed possible remains of the 14th century Bordesley abbey Grange including a possible vivarium and investigations are on-going. There are 2 documented medieval pits within area 4<sup>12</sup>. Until the dissolution of the monasteries these were held by the abbot of Bordesley who then leased them together with land and farm on a 60 year lease to Thomas Holliock in 1530. One of the pits is located at the top of the concrete path next to the cattlesheds on Tony May's Land. This is the "coppice" you refer to in your report and lies in a field called "Stonepit Piece" and the other is Holyoakes Pit which lies in Pool Meadow<sup>13</sup>. There is a large pool in Holyoakes pit which was created by damming Swann Brook. Remnants of a possible medieval earth dam can still be seen together with a post-medieval brick dam. The appraisal of area 4 also mentions evidence of medieval ridge and furrow fields in this area.<sup>14</sup> A simple desk based archaeological survey would not be acceptable if this area was to be developed indeed the HER report for this area clearly states that the absence of archaeological reports in this area does not mean the absence of archaeology. Therefore time and money would be needed to properly investigate and protect the pits and any associated archaeology around Holyoakes Farm, the former Tynsall field which is the land adjacent to the A448 opposite Hewell Grange and the Lane House if we are not to lose yet another part of the ancient history of Redditch, Tardebigge and Bromsgrove.</p> <p><sup>10</sup> <a href="http://www.reading.ac.uk/bordesley/Granges.htm">http://www.reading.ac.uk/bordesley/Granges.htm</a>. Research in progress on the Granges of Bordesley Abbey</p>	<p><b>Officer response</b></p> <p><b>Assessment and potential need for appraisal either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</b></p>
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Sub Issues	Officer response
<p><sup>11</sup> now extinct  <sup>12</sup> see national archives re Bordesley rentals and Earl of Plymouth Archives  <sup>13</sup> Tithes map  <sup>14</sup> Della Hooke in Anglo Saxon Charters of Worcestershire identifies and maps the burial ground of Ealhmund an important Anglo-Saxon chieftan of Bromsgrove and potentially one of Bromsgrove's oldest burial grounds.  Have detailed studies been carried out over and above desktop studies?</p>	<p>The Historic Environment Assessment (HEA) for Bromsgrove District combines county landscape character mapping with Historic Environment Record (HER) data and an outline Historic Landscape Character Assessment to produce 20 distinctive Historic Environment Character Zones (HECZ). This site falls within Historic Environment Character Zone (HECZ) 147 of the Historic Environment Assessment (HEA) which has been identified as having moderate potential for unknown archaeology; therefore an appraisal of the site may be required prior to any development.</p> <p><b>ACTION: Include reference to the Historic Environment Assessment and potential need for appraisal either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</b></p>
<p>There has been no detailed consideration for the destruction of the "Incredible" (Ordinance Survey 2013) Monarch's Way footpath within the consultation. This historic route will be destroyed throughout the length of the development.</p> <p>Across the proposed site from the A448 is the Saltway, an ancient Roman road now a public footpath and running west from Curr Lane is a section of Monarch's Way, at 610 miles in total, the second longest way marked route in the country celebrating Charles II's escape after The Battle of Worcester. Both these popular and well walked ways are PRoWs – Public Right of Ways – and as such are legally protected.</p> <p>Conflict with the character of the local Conservation area</p>	<p>The section of the footpath which crosses the site will be incorporated into the green infrastructure network. There have been no objections in principle from the County archaeology team.</p>
	<p>The A448 acts as a natural boundary between Site 1 and the Conservation Area. Development would be kept away from the north</p>

<p><b>Sub Issues</b></p> <p>Site 1 comes extremely close to the boundary of the Conservation Area and it is inevitable that the disturbance in the form of noise, street lighting and traffic will be detrimental to the Registered Park</p> <p>May damage historic or architectural value of listed buildings in the area</p>	<p><b>Officer response</b></p> <p>east corner of the site to avoid any impact on the setting of the CA and the Grade II listed Water Tower</p> <p>Lanehouse Farm, listed Grade II is opposite the site. The NPPF states that “Substantial harm to or loss of a grade II listed building, park or garden should be exceptional” further that “Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss”. The proposal is not likely to substantially harm this asset.</p>
<p>There is at Holyoakes Farm, (origin 17<sup>th</sup> Century “A Thousand Years of Tardbigge “by Margaret Dickens ) an on -going excavation conducted by North Worcestershire Archaeology Group after the discovery of a large stone wall buried 4 to 5 feet below present ground level, possibly related to water management and former foundations. This excavation is on- going and records will be updated as new developments are uncovered. “The proposed development could potentially impact on below and above ground archaeological remains.”</p> <p>Before written history, archaeology is the only testament to generations of people of whom there is no other record. Archaeological heritage will be lost forever if the proposed Foxlydiate Development of 2,800 houses is sanctioned.</p>	<p>Acknowledge that there is potential for archaeology at Holyoaks Farm. Reference to survey work on HE and archaeological assessment to the standards required by WCC would be advantageous.</p> <p><b>ACTION: Include reference to the Historic Environment Assessment and potential need for appraisal either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</b></p> <p>Reference to survey work on HE and archaeological assessment to the standards required by WCC would be advantageous.</p> <p><b>ACTION: Include reference to the Historic Environment Assessment and potential need for appraisal either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</b></p>

KEY ISSUE: Housing - Affordable

<p><b>Sub Issues</b></p> <p>Placing people with reduced incomes in affordable housing, miles away from facilities and local amenities will be a financial drain in</p>	<p><b>Officer response</b></p> <p>The provision of affordable housing is a requirement within any residential development proposal. The policy ensures essential</p>
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travelling to such facilities.	services such as a schools, retail and community facilities are within the development therefore increasing its sustainability
Affordable housing should be built as near to the Town Centre as possible.	<p>There are redevelopment opportunities within the Town Centre. However, the Local Plan has a duty to meet other development needs such as retail, leisure and other compatible town centre uses as well as housing. Until more detailed plans emerge to deliver the Town Centre Strategy, the amount of residential development feasible cannot be identified.</p> <p>Whilst it is acknowledged that development located in or close to the Town Centre has many advantages, the likely amount of residential development that could be provided would not be substantial enough to remove the need for residential development elsewhere in the Borough.</p>

KEY ISSUE: Infrastructure – General

<b>Sub Issues</b>	
<p>There is a refurbished Village Hall in Webheath, no further meeting places are needed.</p> <p>No local GP surgeries, dentists, pharmacies, shops, pubs, sports and recreation facilities in the area.</p> <p>Is there any evidence to suggest the current Webheath residents want additional facilities and amenities?</p> <p>Even if you could persuade the developers to build shopping, leisure and health facilities in this new development in order to make it sustainable there is the added challenge of convincing traders to invest in and populate the new commercial outlets. This will be especially difficult in a recession.</p>	<p><b>Officer response</b></p> <p>Development of this scale (2800 dwellings cross bdy) is likely to require new community facilities including doctors, dentists, shops etc.</p>
<p>Is there any evidence to suggest the current Webheath residents want additional facilities and amenities?</p> <p>Even if you could persuade the developers to build shopping, leisure and health facilities in this new development in order to make it sustainable there is the added challenge of convincing traders to invest in and populate the new commercial outlets. This will be especially difficult in a recession.</p>	<p>In the interests of sustainability we would encourage this type of use. There is nothing to suggest it wouldn't be economically viable in this location. The Redditch Retail Needs Assessment (2008) <a href="http://redditch.whub.org.uk/cms/environment-and-planning/planning-services/planning-policy/development-plan/emerging-local-plan-no4/evidence-base.aspx#RNA">http://redditch.whub.org.uk/cms/environment-and-planning/planning-services/planning-policy/development-plan/emerging-local-plan-no4/evidence-base.aspx#RNA</a> states at paragraph 8.21 "In the context of continuing research into the preferred location for significant housing growth in and around Redditch, there is likely to be scope for the provision of a new district centre (or centres) to serve the needs of</p>



Sub Issues	Officer response
	<p><i>the larger new housing areas. Such a centre (or centres) could also help serve local needs in existing areas which currently lack a range of facilities (e.g. some northern and western areas of Redditch). A new district centre may not necessarily be located within the administrative boundary of Redditch. The location of new centres should be carefully considered in the context of the need to serve new housing growth areas and existing housing areas within Redditch which lack easy access to a foodstore capable of serving main food shopping requirements." So there is likely to be a requirement for new provision which can remedy existing deficiencies in this location.</i></p>
<p>A local shop may be included on the development however people will still travel to the large supermarkets for their main shop</p>	<p>Noted</p>
<p>Elsewhere, such as The Oakalls, promises relating to infrastructure and facilities are made at this stage of planning which are then not fulfilled at the implementation stage.</p>	<p>Facilities and infrastructure that are required will be specified within the Policy and Infrastructure Delivery Plan (IDP) and negotiated through the planning application process.</p>
<p>The development proposes that a community centre and shop be provided. This will become a destination for the populace outside of the developed area - especially if it is closer than facilities elsewhere. This will create traffic into the new development, and this will likely be at already busy times of the day. Little regard has been given to the impact that this additional traffic will have upon the surrounding roads.</p>	<p>A Community Centre and shop is not likely to trigger significant traffic from outside the locality. Predicted traffic numbers have been considered through the Worcestershire County Council Transport Studies. New facilities in this location attracting existing residents would help to improve the overall sustainability of the town.</p>
<p>Mail Postcode areas: Area 4 is served by two sorting offices; this will affect deliveries as they will come from two separate sorting offices, dependent upon current postcode boundaries, increasing CO2 emissions. Royal Mail should be engaged to appraise the situation.</p>	<p>Carbon emissions from Royal Mail deliveries are an issue for them to consider. Royal Mail are undergoing a nationwide programme of operational transformation and are required, like other parcel companies, to update their services. Part of their modernisation includes actions to reduce their impact on the environment.</p>
<p>When will new planned infrastructure be phased?</p>	<p>Officers are engaging with infrastructure providers to determine appropriate phasing.</p>
<p>In line with present government policy encourage all employment opportunities to avoid life on benefits being a "life-style" choice. Therefore residents should not be restricted to Redditch for choice of work.</p>	<p>There are no restrictions on where residents can work.</p>

<p><b>Sub Issues</b></p> <p>A fibre-optic cable follows the line of the gas main Area 3 (southern section) but could be accommodated within a central area of open space.</p> <p>An Oil Pipeline crosses the north-western part of Area 3 (southern section) and will have to be accommodated with any layout.</p> <p>A fibre optic cable, owned by Geo Networks limited, crosses the middle portion of Area 3 (southern section) from east west. For the majority of its length the cable runs within the safety stand-off corridor associated with the high pressure gas main. Joints in fibre optic cables are not welcome and every effort will be made to incorporate that portion of the cable not within the safety stand-off corridor associated with the local high pressure gas main to be retained within public open space/pedestrian areas.</p> <p>The Birmingham Airport Link of the Fawley to Seisdon oil pipeline, operated by Esso Petroleum Company Limited, passes west to east across the middle portion of the phase three site, passes under the A448 and continues across Butler's Hill to the east. No works are permitted within 3.0m of the pipeline without prior notification and diversion of the pipeline is not a viable option.</p>	<p><b>Officer response</b></p> <p>This can be considered in master planning of the site these types of constraints have also been resolved in other locations around Redditch where constraints affect the site.</p>
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**KEY ISSUE: Infrastructure – Education**

<p><b>Sub Issues</b></p> <p>Local schools are at full capacity</p> <p>There is no readily accessible Middle or Secondary school</p>	<p><b>Officer response</b></p> <p>Approximately 1000 houses can sustain a one form entry first school; therefore the cross-boundary housing proposed would be expected to generate approximately 96 additional pupils per year group. There are currently very few first school spaces remaining across Redditch. Therefore two new first schools would be needed on-site, each to be capable of accommodating up to 60 children per year group, to be provided alongside the phases of housing.</p>
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Sub Issues	Officer response
	<p>The middle and high schools in Redditch currently do have spare places (138 places in current Year 5 and 155 places in current Year 9). Consideration does need to be given to which catchment areas the developments would fall into and any change would need to be the subject of a formal consultation. A number of the middle and high schools in Redditch were previously larger than their current admission numbers, therefore, if necessary, higher intakes could be achieved to provide extra spaces.</p> <p>It is not clear at the moment that an additional middle school is needed; however this could change depending on pupil numbers and if there were any catchment area changes. Worcestershire County Council periodically refresh their requirements to take account of all changes.</p>
<p>Residents in Webheath can't get places for their children in local schools enabling them to walk to school, cars will have to be used, therefore increasing the Co2 emissions</p>	<p>School provision would be developer funded.</p> <p>Noted. Worcestershire County Council has advised that <i>“Webheath First School Academy currently has sufficient places for the number of children living in the catchment area who start school each September. Places cannot be held back for children who move into the area after the closing date so late applications or families looking to move schools at other times may find that there are no places available in their preferred school but will be offered an alternative. The County Council has approved the expansion of Batchley First School from September 2014 intake to provide additional school capacity in this part of Redditch. Numbers will continue to be monitored and additional expansions considered as and when necessary.”</i></p>
<p>The only way to affect obesity and weight problems is for children to walk to school. This housing development will not provide this option.</p> <p>What is not ascertained is how far it is reasonable for children to walk to school.</p>	<p>Walking and cycling is a consideration within the Policy. In addition, a school will be provided on-site. A Travel Plan will be required as part of a Planning Application for the development and a separate Travel Plan will be required for the school.</p> <p>Paragraph 3.19 of the HGDS states that a reasonable walking</p>

Sub Issues	Officer response
<p>3. 19 of the Study says that to date, only desktop studies have been carried out to ascertain proximity to schools. This is inadequate for the purposes of this exercise.</p>	<p>distance to services and facilities is less than 3km. There is not considered to be a more accurate way to ascertain proximity than measuring it.</p>
<p>Education aspects inadequately researched. There is no relevant Education material listed in the References in Appendix III.</p>	<p>Appendix III is a Glossary List. There is no published information regarding education that needed to be referenced. Consultation is ongoing with Worcestershire County Council (WCC) regarding infrastructure needs.</p>
<p>Forecasted growth of 96 additional pupils per year is not up to date and subject to the release of 2011 census data</p>	<p>WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.</p>
<p>The study referred to two new first schools being required. This is confusing as all other statements in the study refer to a (i.e. one) new first/primary school.</p>	<p>Two new first schools are required to support the growth of Redditch.</p>
<p>The statement in relation to a potential middle school is non-committal and un-researched</p>	<p>WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.</p>
<p>There is no reference to natural links to high schools. There are also no feasibility studies into a new high school or “an all through” school.</p>	<p>WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.</p>
<p>We agree that for this scale of development a new first school would be required. The school would need space on site to accommodate up to 450 pupils, although construction would be incremental as the development progressed. The County Council expect development to fund 100% of this new infrastructure, including provision of a suitable site, as the school would purely be serving new development. There would be a presumption under current regulations that the new school would be a free school or academy but the County Council would consider other methods of establishing the new school in line with regulations in place at that time. The County Council is not of the opinion that additional middle or high schools are required. However we will be expecting these developments to make appropriate contributions towards extending provision at existing schools as necessary to meet any increased demand.</p>	<p>Noted.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Will generate families with school age children in excess of 1,800; even with the promise of a new first School there will be a considerable short fall of availability for school placements at all levels, not just First School level.</p>	<p>WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.</p>
<p>Distances to first and special schools relating to Site 1 are closer than for example Area 8. Until the new first schools are provided (likely several years after the first housing occupation) pupils seek places at existing schools. For both middle and secondary schools, Area 8 is closer to existing schools than Site 1. As it appears that no provision is required on Site 1 for middle or secondary education this will increase the need to travel, particularly at peak times.</p>	<p>School infrastructure will be delivered at the appropriate phase. It is acknowledged that travel to Middle and High schools may be necessary, however the Policy requires that sustainable means of travel to facilities such as Middle and High Schools is provided.</p>

**KEY ISSUE: Infrastructure – Funding**

<b>Sub Issues</b>	<b>Officer response</b>
<p>Who will pay for the infrastructure required to support this development</p>	<p>Generally developers will fund the infrastructure. The IDP will identify the funding streams</p>
<p>How would Redditch B.C. the Police and the Emergency Services cope with the extra services required for thousands of new households?</p>	<p>BDC will have a duty of care for the cross-boundary development located in its District. Emergency services are partly funded through council tax, regardless of which authority council tax is paid to. In terms other local authority expenditures this will either be dealt with via the local authority who collects the council tax or by legal or other arrangement with, or including the neighbouring council.</p>
<p>Redditch already needs a new fire station</p>	<p>Consultation response on behalf of HWFRS indicates that a new capital facility is not required in order to fulfil their statutory obligations. However, WMP will require the provision of a new dedicated police station in Redditch in the long term.</p>
<p>Although some capital investment may be forthcoming from developers to support major infrastructural work, the not inconsiderable on-going costs would have to be borne by Redditch council at a time when councils are already strapped for cash.</p>	<p>On-going costs have not been identified; however grounds maintenance etc will be dealt with through council tax and other legal/management arrangements.</p>
<p>If there is truly no alternative to this development for Bromsgrove I would expect to see Redditch negotiate a far higher contribution to</p>	<p>This is the councils preferred option although alternatives do exist. The policy has been prepared by both councils and it addresses the</p>

<b>Sub Issues</b>	<b>Officer response</b>
facilities and road improvements in the Redditch area and a development richer and self sufficient in facilities.	issue of new development being sustainable and having regard to wider social and other infrastructure issues. Negotiated contributions would be proportionate, necessary and related to the site.
Why are tax payers being made to pay extra for increased infrastructure for houses to be built in Bentley / Foxlydiat when they can be produced a lot cheaper and with far less impact on the environment in Bordesley	Officers are not aware that it is more expensive to build at Foxlydiat rather than Bordesley, nor has evidence been submitted to demonstrate this. The cost of infrastructure is not the sole determining factor on the location of development, although it is a consideration.

**KEY ISSUE: Infrastructure – Health**

<b>Sub Issues</b>	<b>Officer response</b>
Alexandra Hospital will not cope with additional strain on resources from additional development	Worcestershire Acute Hospitals NHS Trust was consulted on this proposal and is aware of the amount of development needed and population changes up to 2030. The Councils will continue to engage with the Trust through the Infrastructure Delivery Plan (IDP) process.
GP facilities will not cope with additional strain on resources from additional development	Consultation with the infrastructure providers including the Redditch and Bromsgrove Clinical Commissioning Group is on-going to determine the infrastructure needed to support development.
No medical facilities in the area for future Foxlydiat residents	
Health resources already stretched, will have great difficulty in serving total projected Redditch housing growth of more than 6,000 (a new intake of perhaps 15,000 – 20,000 people or an increase of circa 20% - 25% in the current Redditch population).	
NHS website suggests methods of transport to practices but none can be reached by bus from Area 4. It has advised patients to go by car, taxi or to walk a considerable distance to access public transport.	Consultation with the infrastructure providers is on-going to determine the infrastructure needed to support development. Appropriate bus infrastructure will be required. New public transport services will be provided to serve the area.

**KEY ISSUE: Infrastructure – Utilities**

<b>Sub Issues</b>	<b>Officer response</b>
Area 4 is furthest away from primary electric, gas, water and telecom services.	There has been no indication from infrastructure providers that there will be a problem servicing any site around Redditch. Furthermore

Sub Issues	Officer response
<p>Area 4 site is too far away from any BT exchange at Headless Cross (BT Exchange site) (WMHX), for what can be considered as a useable Broadband speed for Internet usage, gaming and those that work from home or run businesses from home.</p>	<p>utility providers have not made representations on specific sites.</p>
<p>The Foxlydiate/Bentley area currently lies the furthest distance from the primary power supplies and would prove to be one of the most expensive options in terms of providing new 11 kv circuits. In terms of sustainability and deliverability this does not make sense.</p>	<p>Consultation with the infrastructure providers including Western Power Distribution and National Grid is on-going to determine the infrastructure needed to support development.</p>
<p>Study is silent on the availability of electricity to Site 1. No evidence that discussions have taken place with any provider as to capacity available, the need for upgrades of facilities and cost of providing sufficient power.</p>	<p>Electricity supply is not considered to be an issue on this site, this has been confirmed by the infrastructure providers.</p>
<p>No detail about the ability and cost of providing acceptable telecommunications to the development. Broadband provision in particular is very poor in the parish.</p>	<p>Consultation with the infrastructure providers is ongoing to determine the infrastructure needed to support development.</p>
<p>Electricity Services are not an impediment to development. 66kv and 11kv cables can be diverted into an underground route through the development.</p>	<p>Noted.</p>
<p>May be a need for future reinforcement works to the Redditch primary substation, but Western Power Distribution does not consider that this would be an impediment to development</p>	<p>Noted.</p>
<p>Water abstraction boreholes are situated either side of Cur Lane. These do not represent a significant constraint to development. There are a number of water mains, these will have to be accommodated in-situ within development layout. May be necessary to reinforce local water supply network, but this is feasible and viable.</p>	<p>Noted.</p>
<p>A high pressure gas main crosses Area 3 (southern section) and will be accommodated within any layout. Assumed reinforcement of local gas network will be needed, but this is achievable.</p>	<p>Noted.</p>
<p>Western Power Distribution has indicated that existing network has capacity to serve between 200/300 new dwellings without undue alterations or off-site reinforcements</p>	<p>Noted.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Future electricity supplies may involve reinforcement works to the Redditch primary substation but Western Power Distribution stated it cannot consider this in detail until firmer details on the likely rate of increased demand is known and an assessment made of the overall demand at the time of requirement.</p> <p>The site is clear of overhead and underground cables operated by British Telecom.</p>	<p>Consultation with the infrastructure providers is ongoing to determine the infrastructure needed to support development. However, it is not likely that firm details are known until a planning application is received.</p>
	<p>Noted.</p>

**KEY ISSUE: Landscape**

<b>Sub Issues</b>	<b>Officer response</b>
<p>Important ancient area, The Monarch's Way, runs through it and should not be destroyed.</p>	<p>Features such as the Monarchs Way should be encouraged to be incorporated into the development.</p>
<p>Undulating land, which gives the area its character, will be levelled for building.</p>	<p>The levelling of ground is not necessary for development to commence.</p>
<p>Question whether any thought has been given to screening the planned development from residents.</p>	<p>The sites have been assessed for their ability to integrate into the existing urban area rather than possible screening from existing residential development.</p>
<p>The area as it stands offers much in the way of recreation and historical interest to cyclists, walkers and riders, and to the residents who prize its rural character</p>	<p>Historical and recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.</p>
<p>The area is agricultural land (ranging from 1 to 3b) and development would oppose the aims of enabling local food production. Government's target for sustainability on food is 85% whereas we are currently at only 64%. Developing this area would exacerbate this already poor situation.</p>	<p>Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development.</p>
<p>The countryside in the proposed area contains some land of high landscape sensitivity.</p> <p>Area 4 is defined as Medium/High Landscape Character which has been stated in Bromsgrove's Green Infrastructure report as</p>	<p>The area is located within a medium to high landscape sensitivity risk. This level of risk is similar to the other areas subject to this Focussed Area Appraisal, therefore sensitive design would be required to mitigate the impact on the landscape.</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>not preferred development land</p>	<p>Whilst it is preferable for development to occur in areas of low sensitivity, all of the land around the periphery of Redditch is of medium or high sensitivity and therefore the medium sensitivity of this area is not an undue constraint that weighs against the choice of this particular area.</p>
<p>The positioning and height of the development site will mean it will be a blight on the landscape from some considerable distance as the land to the south west drops away.</p>	<p>The boundaries to site 1 have been carefully drawn to help minimise the impact on the landscape. The north eastern part of the area comprises of undulating countryside with two low ridges (130-145m) running perpendicular to the A448, leading up to a high ridge at approximately 150 metres. Beyond this ridgeline the land slopes downhill in a north westerly direction to Tardebigge. Any development to the south of the 150m ridge would be well contained.</p>
	<p>It should also be noted that the area is well screened from the A448 dual carriageway by virtue of the earthworks created when the road was constructed. Further screening and careful site masterplanning can be employed to mitigate against the effect of views into the site on the higher parts of the site to the far west.</p>
	<p>The Spring Brook with associated hedgerows and trees provides a strong boundary to the west on the parcels of the development area. This will limit the impact on the wider landscape.</p>
<p>New housing on the Foxlydiat site will be located on an Area of Landscape Protection as revealed in the 1973 study.</p>	<p>Landscape Protection Areas no longer exist as they were derived from a Worcestershire Structure Plan policy that has now been deleted.</p>
<p>Area 4 looks outwards to the Malvern Hills and the Cotswolds. Both have the status of being designated Areas of Outstanding Natural Beauty. It would be interesting to see what the Planning Inspectorate view on this is.</p>	<p>The designated status of these areas is acknowledged however they are a significant distance from site 1 meaning there would be no significant impact upon them. This is not a reason to constrain development.</p>
<p>Site 1 (Foxlydiat) is far too large and should not extend along the A448 beyond Tack Farm where there is a natural visual (hilltop) and transport boundary. The area of 3 fields in the northwest of Site 1 along the A448 beyond Tack Farm must be retained as agricultural</p>	<p>Every effort has been made to draw the most defensible and enduring Green Belt boundary. The north eastern part of the area comprises of undulating countryside with two low ridges (130-145m) running perpendicular to the A448, leading up to a high ridge at approximately</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>land as a minimum.</p> <p>The large part of the proposed development is on a ridge adjoining the current Bromsgrove/Redditch highway – this would make the development visible for miles around and certainly not in keeping with the policy used to deliver the proposed development.</p>	<p>150 metres. Beyond this ridgeline the land slopes downhill in a north westerly direction to Tardebigge. Any development to the south of the 150m ridge would be well contained.</p>
<p>The Tardebigge area provides a critical countryside amenity for the whole West Midlands area and encroaching housing into Tardebigge and Bentley will quickly destroy this.</p>	<p>It is not considered that the countryside amenity in the Tardebigge area is any more critical than any other area near Redditch. Green Belt boundaries have been carefully drawn so encroachment will not occur.</p>
<p>Existing options should be fully explored before new farmland is annexed for house building.</p>	<p>20 different sites were considered around the periphery of Redditch all of which were rural in nature. It is considered that the quality of agricultural land is a minor constraint to development. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch</p>
<p>Will spoil natural and existing contours</p>	<p>It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development. Excessive remodelling of land will be avoided.</p>
<p>Will destroy traditional field patterns</p>	<p>A strategy and management plan for Green Infrastructure should include a hedgerow assessment, determining which hedgerows are worthy of retention and protection and therefore protect field patterns.</p>
<p>Landscape valued for recreational purposes</p>	<p>Noted, recreation use is common in all semi-rural areas and therefore in all of the potential development sites.</p>
<p>Development at Foxlydiat would have a detrimental impact on the designated landscape of Hewell Grange.</p>	<p>Comments noted. The HGDS considers landscape issues within HGDS paragraphs 6.2.6 and 6.2.8.</p>
<p>Topography would allow the housing to have no connection to the built urban form and would be clearly visible out into the wider rural landscape.</p>	<p>Disagree, the HGDS considers topography constraints at para 6.1.78 which suggests that the area could connect to Redditch in terms of its built urban form.</p>
<p>Views from northern elevated part of the site do not pick out the existing urban conurbation and this land is unrelated to Redditch which is well screened by vegetation and topography.</p>	

Sub Issues	Officer response
<p>From any point on this area and looking in any direction but North all that can be seen is rural landscape so would be exceedingly obtrusive into the wider rural landscape.</p> <p>Turning down Foxlydiate Lane, views to the north-east are of unbroken countryside, the housing fronting this road being effectively screened by a thick belt of vegetation. Development could however, be confined here to the two depths of smaller fields without undue visual harm. This land lies at a lower level and is both visually and physically contained by rising land to the north.</p>	<p>Para 6.1.89 of the HGDS states <i>“Development on Area 4 could be connected to the existing built form of Redditch in terms of Webheath and there is potential to connect to the A448. Careful design would be required at the A448 and at the north eastern point due to steeper slopes which could be mitigated by strategic landscaping. This is also a consideration at the western edge of the area due to the potential for encroachment when viewed from the west.”</i></p> <p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of sufficient Green Belt land, within Bromsgrove adjoining Redditch.</p>
<p>The southern part of site 1, adjoining development centred on Great Hockings Lane, is prominently rising land, facing north with expansive panoramic views to the Malvern Hills in the west and the Clent Hills to the north. Development here would be highly visually intrusive and would not relate to the existing residential area.</p> <p>Character and sensitivity of the landscape needs to be considered as the site is located on a west facing slope and development should seek to minimise the potential impact on Green Belt.</p> <p>Spring Brook could act as a natural boundary to an extension with additional buffer planting where appropriate.</p> <p>Photograph 53A looks west across Spring Brook towards open countryside which suggests housing development in the foreground could be seen from a distance.</p> <p>Land at Webheath (Areas 1 and 3) has greatest capacity to accommodate development and Area 2 (south of Cur Lane) has</p>	<p>The boundary running along the tree-lined watercourse was identified as offering the greatest amount of visual containment. Para 6.1.87 of the HGDS states <i>“...For the most part the area is sufficiently enclosed so, providing that the area is sensitively developed, the Green Belt impact could potentially be minimised.”</i></p> <p><b>ACTION: Ensure that reference to sensitive landscaping is reflected either in the Policy or ensure there is reference to this elsewhere in the BDC plan.</b></p>
<p>Land at Webheath (Areas 1 and 3) has greatest capacity to accommodate development and Area 2 (south of Cur Lane) has</p>	<p>Noted. This has been considered within the HGDS.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>similar capacity to the other potential growth options.</p> <p>Land south of the Bromsgrove Highway (Areas 1 and 2) offers the strongest potential to accommodate development that is carefully designed to respect the setting of the existing urban area, and the sensitivity of the adjacent landscape.</p>	
<p>Area 1 lies in a localised valley which affords it a degree of containment and enclosure by roads and strong boundary vegetation, including a strong belt of trees along the existing urban edge of Webbeath defined by Folydiat Lane.</p>	<p>Noted. This has been considered within the HGDS.</p>
<p>Land has limited visual receptors which add to the moderate level of sensitivity, in contrast to other Growth Option areas to the north-east of the Bromsgrove Highway and beyond.</p> <p>South of Cur Lane is on a consistently sloping valley side that ranges from 130AOD in the southwest corner to 105AOD in the east. This creates an open aspect to views from the immediate countryside to the west, but protected from wider views due to the number of ridges and localised highpoints that filter views.</p>	<p>Noted. These constraints have been considered within the HGDS.</p>
<p>Area A contained by rising topography to the west and north, limiting views from wider landscape. Localised views from roads and footpaths are available, despite being within a rolling landscape. Wider views limited due to topography and vegetation. Cur Lane is winding and enclosed by hedgerows and trees limiting views in; the same with Folydiat Lane where only gaps for field access provide views into the site.</p> <p>Rolling topography and pastoral character the south of the site is more visually exposed, with the appearance of the existing urban edge visible along the ridgeline to the east. This area has a moderate strength of character, displaying some characteristics of the landscape type, therefore would have moderate landscape sensitivity to change.</p>	
<p>Impact on residential amenity is restricted to existing urban edge and</p>	<p>Agree.</p>

Sub Issues	Officer response
<p>three properties in or close to the site.</p> <p>Noticeable difference in quality of landscape resource from east to west in Area A. North west parts of Area A large scale agricultural landscape with relatively limited visual receptors and landscape character is clearly disturbed and in need of restoration. Southeast is more managed character and smaller scale, with remnant field boundaries and copses retained</p>	<p>Noted.</p>
<p>Land in the north western part of Area A has notable capacity as there are few landscape features present and is visible from a limited number of receptors, albeit it is gently sloping from the A448 and more visually exposed than south eastern part.</p>	<p>Noted. These constraints have been considered within the HGDS.</p>
<p>Northern boundary open to views from the north. Would benefit from additional planting to enhance existing hedgerow and provide a strategic landscape buffer</p>	<p>It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.</p>
<p>In western edge along Cur Lane, views from Monarch's Way should be mitigated by strategic planting to offset possible impact.</p>	<p>Agreed. The aim of the policy is to have an overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation.</p>
<p>There is scope to utilise existing vegetation structure to minimise potential impact on the surrounding countryside</p>	<p>Assessment across all focussed area appraisals is consistent.</p>
<p>Do not believe the text and photographs relating to the Green Infrastructure of Site 1 provide the necessary comprehensive physical description of the area and its relationship to the urban form of Redditch.</p>	<p>The policy requests that detail is provided to show the site has maximised opportunities for biodiversity and supplemented with an overall strategy and management plan for Green Infrastructure.</p>
<p>Redditch built up area largely surrounded by low hills and ridges c. 120 – 170m O.D. Land drops to c. 70m in the Arrow Valley with Redditch town centre elevated at 125m O.D. Existing housing concentrations therefore well contained in a bowl defined by high ground acting as a robust boundary to urban sprawl. Spilling out beyond this bowl into open countryside would occur if proposals to develop Site 1 agreed.</p>	<p>The site is not part of the Redditch 'bowl' setting and needs to be assessed on its own merits. It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.</p>
<p>Had a topographical map been included in the study, it would have shown predominant slopes in Site 1 face south and west, i.e. away from Redditch rather than towards it.</p>	<p>Not included in the HGDS, however, contour maps were used during site assessments.</p>

Sub Issues	Officer response
<p>Photographs 79 and 21A indicate a wide sweeping slope where the impact of housing development is difficult to mitigate. It could dominate nearby landscape slopes to the west, creating, at Cur Lane, a jarring interface between town and country. Development on upper slopes would be visible from Holyoakes Lane and High House Lane, which the Study seems to acknowledge.</p>	<p>It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.</p>
<p>Unfortunately that photograph 82B which seeks to define the Spring Brook boundary, looking south, does not show that to the left of the building there is a very steep slope leading up to Webheath. Any housing here would look away from Redditch out towards open country and would be difficult to obscure</p>	<p>It is acknowledged that this land does slope down towards Spring Brook, it should be noted that the Brook lies in a valley. Development on the mentioned slope would be visually contained as the land rises up west of the valley floor.</p>
<p>Despite the suggestion that Site 1 would connect with Redditch via Webheath there is no natural link either to the town or to the area north of the A448</p>	<p>Development in this location will create a balanced community that fully integrates into the existing residential area of Webheath.</p>
<p>Visual impact is subjective: residents' views need more importance as adverse effects are permanent</p>	<p>This is taken to mean a view as in 'perspective' as it is not clear from the representation. The 'right to a view' is not a material planning consideration. Para 6.1.87 of the HGDS states "...For the most part the area is sufficiently enclosed so, providing that the area is sensitively developed, the Green Belt impact could potentially be minimised."</p> <p><b>ACTION: Ensure that reference to sensitive landscaping is reflected either in the Policy or ensure there is reference to this elsewhere in the BDC plan.</b></p>
<p>The identity is that of a semi-rural village implies that the decision has already been made</p>	<p>Officers cannot find reference to site 1 development being classed as either semi-rural or a village in the consultation documentation.</p>
<p>Development of part of site 4 may be acceptable between Birchfield Rd, Foxlydiate Lane and Cur Lane but no further north west than the extent of existing development on Birchfield Road, i.e. the garage next to the junction with the A448. This is less unsustainable than the whole of site 4 and has logic in urban form for "infilling"/slightly extending existing development. Retention of trees along Foxlydiate lane (NW side) would screen development, minimizing visual impact</p>	<p>The sustainability benefits of this part of site 1 are noted within the report in the context of the wider site 1. It is considered that all of site 1 is acceptable for housing development, along with site 2, to meet the needs of Redditch to 2030 as they are the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. Retention of trees is considered favourable by both authorities.</p>

KEY ISSUE: Open Space

<p><b>Sub Issues</b></p>	<p><b>Officer response</b></p>
<p>There will be insufficient garden or amenity land</p>	<p>Provision is unlikely to be insufficient; however the policy could be clearer with regards to the level of open space provision.</p> <p><b>ACTION: Ensure that open space provision for the development is included either in the Policy or ensure there is reference to this elsewhere in the BDC plan</b></p>
<p>A detailed visual appraisal has been carried out on all 7 areas identified. Topography and natural landscape of the land around the town (Bromsgrove) has a major impact on the prominence of proposed development. The appraisal identifies that Bromsgrove town effectively sits in a bowl and it is imperative to position development to ensure it does not 'spill over' the sides of the bowl and become unnecessarily visible from the wider countryside. This obviously is not taken into consideration in developments which are far enough away from Bromsgrove not to be seen?</p>	<p>This would not have been taken into account as this study has its own strategic objectives. One of which is (Obj. 6) to minimise the loss of Green Belt and areas of high landscape quality.</p>

KEY ISSUE: Rural Economy

<p><b>Sub Issues</b></p>	<p><b>Officer response</b></p>
<p>As part of the rural economy pheasant shoots are routinely held in the woodland and fields adjacent to the pool at Holyoakes Pit. Pheasants and wildfowl are bred and enclosed in woodland around the pool.</p>	<p>Regardless of where the development goes around Redditch there will be a displacement of rural activities. It is uncertain how much pheasant shooting contributes to the rural economy.</p>

KEY ISSUE: Sewage Treatment

<p><b>Sub Issues</b></p>	<p><b>Officer response</b></p>
<p>Sewage treatment will increase carbon emissions</p>	<p>This is agreed; however sewage treatment is necessary to support development.</p>
<p>Pumping sewage to Spenal is not a sustainable option</p>	<p>There are many aspects to sustainability that need to be considered and this is only one. The Council is working with Severn Trent to find</p>

Sub Issues	Officer response
Gravity drainage to Priest Bridge is costly (£2.5m)	<p>the most sustainable option for sewage treatment.</p> <p>This cost is correct however no decision has yet been made over whether this method of drainage would be used. If this method is used Severn Trent would have to find the finance and factor it into their delivery plans.</p> <p>Another option would be to provide a new pumping station. The estimated cost for this would be £100,000 plus annual operating costs.</p> <p>There are no specific actions in the RBC Climate Change Strategy regarding sewage.</p> <p>Development is not allowed to pollute groundwater wells; this will be ensured through the planning application process in consultation with the Environment Agency and Severn Trent Water Limited (STWL).</p>
<p>Providing a pumping station for sewage removal would be contrary to the RBC Climate Change Strategy</p> <p>Development will cause contamination to Curr Lane Wells, public water supply and water gathering grounds</p> <p>Water quality of wells will be prejudiced.</p>	<p>A site specific flood risk assessment will be needed to determine level of flood risk. This work is currently being carried out in line with Environment Agency and STWL requirements.</p>
<p>Water runoff/ flooding and sewage issues have not been addressed – I moved from an address off Foxlydiat Lane partly due to the lack of response from Redditch Council/ Severn Trent to sewage that frequently poured on to the road and ‘green area’ used by children following previous development work – both parties blamed the other.</p> <p>If the option to use the Priest Bridge sewage treatment works is implemented there will be an unacceptable increase in the operational outflow into Bow Brook. Should surface water enter the foul water drainage system there will also be an increase in the outflow from the Priests Bridge directly into Bow Brook, at a point immediately upstream of communities in Saleway Parish</p>	<p>Environment Agency and STWL will determine what is acceptable outflow into the Bow Brook and from Priest Bridge when designing the scheme.</p>
<p>No clear and binding requirement to handle additional sewage and run-off water in an environmental friendly, low cost manner.</p> <p>Severn Trent consider that the appropriateness of locations for development, in order of preference to build would be:</p> <ul style="list-style-type: none"> <li>• 1<sup>st</sup> – Bordesley</li> <li>• 2<sup>nd</sup> – Brockhill</li> <li>• 3<sup>rd</sup> – Foxlydiat</li> <li>• 4<sup>th</sup> – Webheath</li> </ul>	<p>STWL are legally obliged to provide infrastructure to handle sewage however the Councils are unable to influence how this is managed.</p> <p>Preferences of infrastructure providers is not the sole determining factor in site choice, all of these sites are able to be served by STWL.</p>



Sub Issues	Officer response
<p>Area 4 paragraph concludes with: <i>“including a new/first primary school. Sewerage issues would also need to be investigated further.”</i> Whereas Area 8 concludes: <i>“which could be costly.”</i> If it is costly for Area 8 it will be more costly for Area 4 when the school and sewerage issues are included. Why was the phrase “which could be costly” not included in conclusion to Area 4.</p>	<p>Agreed, this is an inconsistency within the Report, it is acknowledged that both areas could be costly.</p>
<p>There is a 525mm (21 inch) diameter foul sewer through Feckenham to Priest Bridge, runs parallel to Bow Brook for most of its length. It performs satisfactorily but during wet weather the sewer may be affected by ground water infiltrating into the pipe, reducing its capacity in wet periods.</p>	<p>Noted, this is a maintenance issue for STWL. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem.</p>
<p>Both options for sewerage would be problematic due to the location on the existing sewerage system. Extensive sewer upgrading work would be required for both options and would take several years to provide.</p>	<p>Both options are technically possible; the chosen option will need to be delivered at the appropriate time to support development.</p>
<p>Source Protection Zones (SPZs) have been modelled to protect specific sensitive locations such as springs, wells and boreholes used for potable supply. They define the source catchment area i.e. the area underlain by groundwater which will eventually be drawn to that borehole or well. Generally, the closer a polluting activity or release is to a groundwater source the greater the risk of pollution (SPZ1 is the inner zone and therefore the type of development and activities that can take place within this zone are restricted). The site is therefore located in a sensitive hydrogeological setting. Further guidance on activities within SPZ1 and topics including: sewage works; groundwater flooding; sustainable drainage; waste storage; fuel storage; groundwater resources etc. is set out in Groundwater Protection: Principles and Practice document (GP3), available via: It's essential these principles are adhered to (where relevant) when detailed proposals are produced, in protecting controlled waters and meeting WFD objectives. Development should be located and designed appropriately and consideration should be given to pollution potential of activities. Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1 we require a risk</p>	<p>Agreed, the groundwater protection principles will be incorporated into the Policy as appropriate.</p> <p><b>ACTION - incorporate these principles into the Policy as appropriate</b></p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>assessment to demonstrate that pollution of groundwater would not occur. This will also require approval from the SuDS approval body (SAB), when established, to ensure they follow the criteria set out in the SuDS national standards (when published), including standards for water quality, design and maintenance.</p> <p>Design of infiltration SuDS schemes and their treatment stages needs to be appropriate to the sensitivity of the location and subject to risk assessment considering the types of pollutants likely to be discharged, design volumes and the dilution and attenuation properties of the aquifer. A supporting risk assessment and careful design would be required to show that SuDS schemes in SPZ1 will not pose an unacceptable risk to drinking water abstractions, for the use of infiltration SuDS to be acceptable.</p> <p>Pumping involves delays and faults with creation of leaking pressure main, giving rise to toxicity.</p>	<p>STWL have advised that Pumping stations are basically large manhole type chambers with pump located in a sump in the bottom. When the level of sewage in the sump reaches a pre-defined level, the pumps switch on, and when the sump is empty the pumps switches off. Within the control equipment there are various systems that monitor performance (for example; whether the pumps are working correctly, if the level in the sump is higher than expected, whether there are any issues with the pressure main) and so if the monitoring systems identify any abnormalities then there are telephone alarm systems in place to seek operational attendance. Also to reduce the risk of sewage escaping which operational help is on its way, there is emergency capacity provided within the sump to temporarily store flows.</p> <p>The pressure mains for the pumping stations are designed based on the amount of sewage being pumped, the length of the pressure main and the height the sewage is being pumped. This then determines the type and strength of pipe used, and during construction this is pressure tested to ensure it is leak free. Under normal conditions pressure mains do not leak and so will not cause ground</p>

Sub Issues	Officer response
	contamination but as will all assets there is a risk of failure, especially as they get older. As pressure mains are under pressure, if they do spring a leak they will result in a burst which would be visible at ground level (also the alarm systems should pick up the fact that the pumps are pumping at a lower pressure). Consequently the risk of toxicity from a sewage pressure main is no greater than a normal gravity sewer.
Waste from Webheath Sewerage Farm will need to travel over Foxlydiate Lane or Heathfield Road.	STWL have advised that Webheath sewage treatment works was abandoned many years ago and replaced with a pumping station off Church Road. This pumping station now pumps the foul sewage to a sewer in Springvale Road (close to the play area adjacent to 26 Springvale Road) and then flows by gravity through the main Redditch sewerage network to Sernal sewage treatment works. Flows do however pass through the northern end of Foxlydiate Lane before passing under the Bromsgrove Highway and on towards the main trunk sewer in the Arrow valley.
Site is clear of any existing adopted or private sewers.	Noted.
Subject to phasing development and following improvement works, adequate capacity can be made available at either Priest Bridge and/or Sernal sewage treatment works.	Noted.
May need improvements to sewerage infrastructure system which the water authorities will have a statutory duty to resolve	Agreed.
Contours suggest foul water will be discharged via on-site gravity sewers to new pumping stations and pumping mains to a suitable outfall sewer	This is consistent with what STWL and Developers have suggested and sewerage issues can be resolved.
Severn Trent Water has welcomed early discussions regarding foul drainage and potable water supply.	Noted.
Further modelling will be undertaken to determine current capacity of existing networks and timescales for implementing upgrades required to accommodate the development.	Noted.
Adequate consideration has not been given to provision of sewerage services in Area 1. The statements " <i>The most sustainable and cost effective means should be implemented which could make the timescale for infrastructure delivery a lengthier process than</i>	It is considered that short term solutions are essential to enable development to occur. STWL are being consulted in order to develop the most suitable and sustainable solutions both in the short term and long term, with the long term solution being a more sustainable option.

Sub Issues	Officer response
<p><i>delivering short term solutions</i>” followed by “<i>However short term solutions could be provided in the interim with a view to more sustainable solutions in the long term</i>” can be seen as indicators of a wish to take the most expedient option which is, in effect, to do very little in relation to long term solutions. This is not planning for sustainable development.</p>	
<p>One might have expected the Outline Water Strategy Report would have addressed possible cross boundary development west and south of Foxlydiate. Site 1 was not included in the list of strategic sites or on the relevant maps and no information was put forward about it.</p>	<p>The cross-boundary sites were unknown at this stage and therefore it would not have been possible to consider any of the cross-boundary sites within this study.</p>
<p>Addition of 6,000 to 8,000 people from Site 1 means the costly gravity drainage system needed. Delivery would inevitably impact on phasing of development. Feasibility studies and assessment of likely cost to Severn Trent customers are absolutely necessary.</p>	<p>Agreed, this further work is being completed. Development is likely to be phased.</p>
<p>Though sewage treatment is not envisaged by Severn Trent Water as being a constraint to proposed developments within Redditch, their 2012 report does not mention the wider Bentley Pauncefoot area.</p>	<p>This report was prepared by STWL and therefore is not the responsibility of the Councils.</p>
<p>With the other reports mentioned in this section it does not comment on the Water Source Protection Zone (SPZ) underlying much of the proposed development area. “Planning for Water in Worcestershire” 2011 states “<i>it is critically important to consider such areas when planning development in Bromsgrove District since the ground water zone is under protection due to human consumption.</i>” The extent of the SPZ is marked on Environment Agency “Groundwater” 1:20,000 map for the area. Difficult to understand why reference not made since it may limit SuDS techniques which could be used.</p>	<p>Noted, the groundwater protection principles will be incorporated into the Policy as appropriate.</p> <p><b>ACTION - incorporate Environment Agency Guidance principles into the Policy as appropriate</b></p>

KEY ISSUE: Site constraints

Sub Issues	Officer response
<p>The document suggests that the scrap yard at the junction of Dagnell End Road and Icknield Street may present an added constraint to</p>	<p>Webheath ADR has not been subject to this appraisal, however, this issue will be considered as part of the Webheath Strategic Site</p>

<p>this site for development, due to an advisory 250m exclusion zone. This is understood, but in a similar vein, the Webheath ADR land includes an area of disused sewage works yet this is not seen as any form of constraint or as requiring any form of exclusion zone. Why is there no consistency between the focussed appraisal assessments on issues such as this?</p>	<p>response to BORLP4 consultation.</p>
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KEY ISSUE: Sustainability

<b>Sub Issues</b>	<b>Officer response</b>
<p>Site is at least an hour's walk from either Town Centre &amp; facilities like shopping centres, bus stations, trains, schools, medical facilities.</p>	<p>See above for schools. It is agreed that it is approximately an hour's walk from Foxydiade to the Town Centre. Other sites are comparable in terms of their distance although it is acknowledged that the Foxydiade site is furthest from the town centre in terms of walking. However the policy is attempting to create sustainable development with onsite provision of community and other facilities and good connectivity to the town centre, schools etc.</p>
<p>No employment in the area for future Foxydiade residents</p>	<p>The emphasis is to provide employment opportunities within and around Redditch's urban area and with good public transport connections.</p>
<p>Redditch cannot offer sufficient opportunities for employment for this amount of additional housing development</p>	<p>The quantum of employment need is identified and provided for in the emerging plans for Redditch, Bromsgrove and Stratford-on-Avon Districts.</p>
<p>It is not realistic to think that those who live in the new development will only work in Redditch or Bromsgrove and will not commute to Birmingham and beyond for work.</p>	<p>This is agreed and acknowledged in the evidence base. However we are trying to create a balanced community so it's important that the evidenced amount of employment growth as well as housing growth is located around Redditch.</p>
<p>No guarantee that transportation to Foxydiade estate will be sustainable. No guarantee that new business will open to support the development in the area.</p>	<p>The policy states "Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch's Way in 1."</p> <p>The policy requires that provision for such facilities is made: the</p>

Sub Issues	Officer response
	market will dictate how these facilities will be used.
Concerns about the distance a fire engine would have to travel to reach a serious incident (fire or road traffic collision) in Webheath or Foxlydiat	<p><b>ACTION: Ensure that the policy provide more detail of the level or scale of community and retail facilities required in the site</b></p> <p>The response from the Fire and Rescue Service does not raise any concerns. Previous discussion has indicated that a Fire Station located to the north of the town would adequately meet response times to the north-west cross boundary arc.</p>
Increased car journeys is not sustainable	This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage. The Policy requires improvements to passenger transport to encourage modal shift.
People will not travel to Redditch to shop, the demographic of this site attracts a higher ACORN rating (social economic status profile) they are more likely to travel to shopping locations where higher-end quality shops and boutiques exist, such as Touchwood, Merry Hill, The Bullring.	It is not possible to determine the demographic of the site, it is intended this site will meet a broad spectrum of housing needs and therefore a range of socio economic requirements.
There are no travel destinations identified to the west of Redditch	It is assumed the respondent is referring to the 'Travel Destinations from Development Areas' Map from Consultation. This map shows that Bromsgrove is west of Redditch and a significant travel destination in terms of meeting the HGDS Strategic Objectives.
People should travel under 4 miles to employment.	This is not a planning policy matter. Planning cannot dictate where people choose to live in relation to their location of work.
Given that Webheath has access issues with poor infrastructure, how can it be easier to connect than Bordesley? If there is a major dependency on access issues being resolved, why is this not seen as a major stumbling block?	Access is direct to the Strategic Road Network for all the focussed site areas. Site 1 is not dependent upon the same access arrangements as Webheath.
Study accepts Site 1 is a greater distance from Redditch Town Centre than several other areas but implies this distance is offset by availability of different routes into the centre. Fail to see the logic of this argument when translated into the perceptions of potential inhabitants of the area.	It is acceptable for the study to make reference to multiple routes being available to the Town Centre where they exist. It is not clear how perceptions of potential inhabitants may affect this.
Development at Site 1 would lead to a disproportionate increase in journeys across town to work which would add to its unsustainability.	This comment assumes all future residents will work on the east of the town, which would not be the case.
Study suggests development in Site 1 would stimulate provision of	The site would facilitate access onto the Strategic Road Network, via a

<p><b>Sub Issues</b></p> <p>additional local facilities in Webheath. The extended shape of the site and topography would not necessarily facilitate access to Webheath by alternative modes of travel. Likely that residents would use private car for local journeys and thus would not necessarily focus on Webheath.</p>	<p><b>Officer response</b></p> <p>range of transport options, and would also provide access to existing facilities in Webheath should the residents choose to do so.</p>
<p>Suggestion that regeneration of Bromsgrove town centre might be assisted by development in Site 1 is speculative than evidence based. If one considers the draw of Merry Hill, Worcester and Solihull, an increase in online shopping and retail and cultural benefits of Birmingham it is only in smaller scale cultural and leisure activities that Bromsgrove might benefit. Redditch however is nearer.</p>	<p>Whilst it is difficult to prescribe how or where people will prefer to shop or access facilities, because the growth locations are all adjacent to Redditch it can be presumed that the majority of residents in any area will use Redditch facilities, however there is a possibility for opportunities for Bromsgrove Town Centre use with Site 1 being taken forward as an allocation just because of its location.</p>

KEY ISSUE: Transportation – Funding

<p><b>Sub Issues</b></p> <p>Widening the roads and adding pavements would have to be considered if these roads were to be used by those living at the new development in area 4. The capital cost assumed will be borne by the developers, but industrial size agricultural vehicles, herds of beef cattle and silage tankers use these lanes therefore frequent damage to new roads, new kerbs and new pavements is inevitable. The cost of repairs would need to be borne by the council. Adding pavements and widening the roads would encroach into the field ditches which are used as emergency flooding conduits.</p>	<p><b>Officer response</b></p> <p>These matters will be considered within the more detailed Development Control process at both the pre-application and planning application stage. As set out in the Worcestershire LTP3, the promoters of new development will be expected to set out in their Transport Assessments (which support a Planning Application), the measures needed to mitigate adverse impacts of generated travel demand and their associated costs (including on-going operating/maintenance costs). These measures will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that transport assessment will set out how the scheme design and mitigation measures will encourage traffic to use the most suitable routes. The Transport Assessment must also include an analysis of accident data and proposed mitigation measures.</p>
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KEY ISSUE: Transportation – Public Transport

<p><b>Sub Issues</b></p> <p>Sites to the north of Redditch are nearer to the rail network</p>	<p><b>Officer response</b></p> <p>It is agreed that sites to the north of Redditch are closer to the train</p>
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<b>Sub Issues</b>	<b>Officer response</b>
<p>The 'mitigation' of adding more buses is reduced because the roads round the affected areas are narrow, winding and hilly, which would make the presence of buses a danger rather than a resource</p>	<p>station and rail links. Other responses deal with sustainable travel patterns. It is envisaged that additional bus services will access existing and new residential areas and not use rural routes.</p>
<p>Whether or not increased public transport opportunities were to be offered, it is noted in a recent report that most car owners would choose to drive.</p>	<p>The Choose How You Move Project Manager has advised that the Choose how you move in Redditch baseline report identified that, prior to the project commencing, most car drivers in Redditch would choose to drive. However, interim results are suggesting that the intensive travel marketing (personalised travel planning) campaigns, investments in infrastructure and improvements in the quality and availability of information are leading to behaviour change. Whenever new developments are planned and proposed through the planning process, a central aim is to ensure that these developments are designed to be sustainable. This includes a wide range of measures, including the provision of enhanced passenger transport, walking and cycling opportunities to ensure that new residents can take full advantage of local services and facilities without being reliant on access to a car. This is a critical to ensure that new residents enjoy a high quality of life.</p>
<p>A comprehensive network of buses travelling to and from Redditch and Bromsgrove town centres including the 2 railways stations, leisure centres and schools and running at least every 20 minutes during rush hour and extending to at least a late bus at 23.00hrs would be the minimum required to coax even a small proportion of the total new population out of their cars. This is an unrealistic expectation in a time when the council has limited and diminishing funds.</p>	<p>It is envisaged that bus services will be introduced to encourage patronage and meet demand. Nothing suggests that increased bus services would be unrealistic as a result of this development.</p>
<p>Buses do not coincide with rail departures / arrivals, can add 30 mins to journey time by waiting for connection, discouraging use of public transport.</p>	<p>As set out in the Worcestershire LTP3, new developments should be designed to be accessible by public transport. The promoters of new development will be expected to set out in their Transport Assessment how this is to be achieved together with a supporting assessment of the subsidies (if any) required to sustain their operation. Ensuring that passenger transport operators work in</p>



Sub Issues	Officer response
<p>Blue Diamond bus service operated in this area may be subject to a monopoly investigation as there is no rival operator, which will result in unfair pricing and degraded routes – running only those that are profitable.</p> <p>Bus fares will be high.</p> <p>Concerned over rumours of a bus route being routed along Great Hockings Lane</p>	<p>partnership will be required in order to encourage passenger transport use. Providing higher frequency bus services can also reduce the wait-time for journeys on bus and rail.</p> <p>Bus Services are operated by private companies, planning policy cannot influence the way they are operated.</p>
	<p>All bus routing and frequency will be considered as part of the transport assessment submitted as part of a Planning Application. As set out in the Worcestershire LTP3 as part of the development control process the developer of the site will be expected to submit a 20 year business case outlining the financial support required from the site to support a service. The developer will be required to set this out in their Transport Assessment submitted in support of any Planning Application. These proposals will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that transport assessment will set out how the scheme design and associated mitigation measures will maximise use of public transport as a means of reducing dependency on car for journeys to/from any proposed development.</p>
<p>No clear and binding (on the developers) requirement to deliver sustainable transport in any form</p>	<p>Disagree, the policy states “Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch’s Way in 1.”</p>
<p>In section 6.1.25 the Study suggested potential to divert 143 service into the area. This is an hourly service to Bromsgrove and may be a viable option for a bus operator; however an hourly service to Bromsgrove will not adequately serve this area. A development of 6,888 population and 40 % affordable housing will certainly require a bespoke bus service route with a frequency in the region of 5-10</p>	<p>WCC LTP3 policy and the Bromsgrove and Redditch Transport Network Assessment and Mitigation Reports (TNAMR) outlines that there will be a requirement for a high frequency bus service linking the proposed development with key destinations and interchanges within Bromsgrove and Redditch. As set out in the Worcestershire LTP3 as part of the development control process the developer of the site will</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>minutes rather than extending existing services.</p>	<p>be expected to submit a 20 year business case outlining the financial support required from the site to support a service. The developer will be required to set this out in their Transport Assessment submitted in support of any Planning Application. These proposals will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that transport assessment will set out how the scheme design and associated mitigation measures will maximise use of public transport as a means of reducing dependency on car for journeys to/from any proposed development.</p>
<p>Halcrow have previously reported on Draft Core Strategy 2 on behalf of Heyford Developments Limited. Is this conflict of interest</p>	<p>WCC have procured transport consultants to complete work on an ongoing basis. This procurement procedure was completed in advance of potential development sites being identified.</p>
<p>An entirely new bespoke (bus) service will be required wherever the development is located and therefore no area is more favourable than another.</p>	<p>This is incorrect; Sites 1 and 2 would not require a bespoke service.</p>
<p>Development will deliver high quality, high frequency bus services with target frequency of 10 minutes. These will link to Redditch and Bromsgrove town centres and train stations. Routing is a matter for detailed consideration but it is likely that services will run through Webheath therefore benefit existing residents. Layout of each phase will ensure all dwellings are located within 250m of a bus stop.</p>	<p>High frequency bus services from new developments have been outlined as a requirement in the WCC LTP3 policy, and the Bromsgrove and Redditch Transport Network Assessment and Mitigation Reports (TNAMR). As part of the development control process the developer of the site will be required to submit a 20 year business case outlining the financial support required from the site to support a service. The developer will be expected to set this out in their Transport Assessment submitted in support of any Planning Application. These proposals will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that transport assessment will set out how the scheme design and associated mitigation measures will maximise use of public transport as a means of reducing dependency on car for journeys to/from any proposed development.</p>
<p>Modal shift to road based public transport will not occur unless a</p>	<p><b>Action – Amend Policy to require that all dwellings are located within 250m of a bus stop.</b> WCC LTP3 policy and the Bromsgrove and Redditch Transport</p>

Sub Issues	Officer response
<p>regular, preferably 10 minute frequency bus service is available from an early stage. No evidence provided to indicate that bus service operators have been engaged in discussion about extending services into Site 1 or provision of new or the level of subsidy required until a service became viable.</p>	<p>Network Assessment and Mitigation Reports (TNAMR) outlines that there will be a requirement for a high frequency bus service linking the proposed development with key destinations and interchanges within Bromsgrove and Redditch. As set out in the Worcestershire LTP3 as part of the development control process the developer of the site will be expected to submit a 20 year business case outlining the financial support required from the site to support a service. The developer will be required to set this out in their Transport Assessment submitted in support of any Planning Application. These proposals will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that transport assessment will set out how the scheme design and associated mitigation measures will maximise use of public transport as a means of reducing dependency on car for journeys to/from any proposed development.</p>
<p>Document states there are 3 bus services running within 1km of the site, but fails to state that the nearest bus stop is 1.4km from the centre of the site, or 1.8km from the furthest point of the site, which is the measurement basis used in other appraisals.</p>	<p>Additional bus stops will be provided within any development site to ensure that all dwellings are located within 250m of a bus stop.</p> <p><b>Action – Amend Policy to require that all dwellings are located within 250m of a bus stop.</b></p>
<p>It is considered satisfactory that there are bus stops within 1km of the site. In fact the nearest stop is 1.4km from the centre of the site, if using similar measuring criteria to that for Area 8. Inconsistencies in focussed appraisals between areas are significant.</p>	<p>The HGDS simply states that there are 3 bus services running within 1km to the north east of the area. The central point of each site was used as a consistent methodology for measuring distances (unless otherwise stated). In addition, bus stops will be provided within any development site to ensure that all dwellings are located within 250m of a bus stop.</p> <p><b>Action – Amend Policy to require that all dwellings are located within 250m of a bus stop.</b></p>
<p>Redditch Station is approximately 4.5 km from Site 1 so if car travel is to be reduced, improved bus connections and cycling routes will be necessary.</p>	<p>The policy states “Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch’s Way</p>

Sub Issues	Officer response
Integration of modes would be encouraged by provision of “cycle and ride” facilities at Redditch Station	<p><i>in 1.”</i></p> <p>Improvements are being sought through the Infrastructure Delivery Plan in relation to cycle parking, improved signage to encourage trips to the railway station and cycle storage at the railway station.</p>

KEY ISSUE: Transportation – Road Infrastructure

Sub Issues	Officer response
<p>Would all traffic (i.e. 6000+ cars) have direct access onto Church Road from the Foxlydiat development?</p> <p>Regardless of what road infrastructure is in place for the larger site, people will use the nearest, most convenient access</p> <p>Development at Foxlydiat should only be accessed via the Bromsgrove Highway so no additional traffic is routed through the existing Webheath development</p> <p>Current road network/ country lanes (Cur Lane, Copyholt Lane, Coalash Lane, Holyoakes Lane, Black Lake Lane, Angel Street, Foxlydiat Lane and Crumpfields Lane, Birchfield Road, Heathfield Road, Middle Piece Drive, Downsell Road, Blackstitch Lane, Hewell Lane/ Alcester Road, Finstall Road, Pikes Pool Lane, Blackwell Road, Green Hill, Old Burcot Lane, Spirehouse Lane) inadequate to accommodate additional traffic volumes.</p> <p>Many lanes already hazardous, especially when used as short-cuts by people unfamiliar with their hazardous nature: many stretches only wide enough for one car; limited passing places; prone to flooding hence riddled with pot holes &amp; in very poor repair; used by large &amp; slow-moving agricultural vehicles hence often covered with mud &amp; dangerous for heavy braking.</p> <p>Concern over safety of roads, the road system is made up of ‘lanes’ will put residents at risk.</p>	<p>The primary access is likely to be on to the A448, additional accesses are yet to be determined.</p> <p>It is anticipated that the most convenient access points will take traffic directly onto the Strategic Highway Network.</p> <p>The development will require a new road network to accommodate the volumes of traffic envisaged.</p> <p>These matters will be considered within the more detailed Development Control process at both the pre-application and planning application stage. As set out in the Worcestershire LTP3, the promoters of new development will be expected to set out in their Transport Assessments (which support a Planning Application), the measures needed to mitigate adverse impacts of generated travel demand and their associated costs (including on-going operating/maintenance costs). These measures will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that transport assessment will set out how the scheme design and mitigation measures will encourage traffic to use the most suitable routes. The Transport Assessment must also include an analysis of accident data and proposed mitigation measures.</p>

Sub Issues	Officer response
<p>Increased traffic along lanes is leading to damage and erosion to the roadside and destruction of grass verges and ditches which is causing unnecessary flooding of the lanes.</p> <p>Bentley and Stoke Prior lanes will be used as shortcuts to Droitwich and motorway junctions, and from further afield into Redditch (Aston Fields).</p> <p>Lanes will be used as short-cuts from the large development; traffic will be met by heavy and frequent farming vehicles.</p> <p>Blackstitch Lane used as a 'rat run' by existing Webheath residents due to congested nature of Heathfield Road.</p> <p>Norgrove Lane and Foxlydiat Lane too narrow to accommodate builders HGVs and additional traffic.</p> <p>Would introduce more than 4200 vehicles to the locality, inconceivable that a substantial number would not find their way onto the narrow lanes</p> <p>Highways Officer could not confirm that measures to prevent excessive use of the lane network in this vicinity would be effective, and acknowledged that development would result in extra traffic on the lanes.</p>	<p>Lanes are used (in part) as "shortcuts" because of delays on the primary Road Network (PRN). In considering the performance of strategic transport infrastructure (including the PRN) with the type, scale and location of development set out in the Bromsgrove District and Redditch Borough Plans, it has been highlighted that significant investment will be required in the PRN. It is clear that improvements to PRN infrastructure will be required to ensure that future delays on the PRN are kept to a minimum and that the PRN represents the most attractive route for drivers. It is recognised that these improvements will have to be supported by development Masterplans and associated transport infrastructure and services mitigation measures which are designed to actively discourage use of country lanes. These mitigation measures will be considered by the Highway Authority within the more detailed Development Control process at both the pre-application and planning application stage as part of their assessment of the proposed development.</p> <p>A delivery vehicle management plan will need to be provided by the promoter of a site, it will need to be agreed with the highway authority and local planning authority. It is expected that transport assessment will set out how the scheme design and mitigation measures will encourage traffic to use the most suitable routes.</p> <p><b>ACTION: Incorporate new criteria "<u>All proposals should discourage unintended through traffic (rat runs) within the development site and/or between sites.</u>"</b></p>
<p>Heathfield Road is busy due to the location of the shop/ post office which is used by local residents.</p> <p>Heathfield Road is almost a one way system.</p> <p>Speeding vehicles – Sillins Lane, Church Road, Foxlydiat Lane, Cur Lane, Blackstitch Lane, Crumpfields Lane</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p> <p>These matters will be considered within the more detailed Development Control process at both the pre-application and planning application stage. As set out in the Worcestershire LTP3, the promoters of new development will be expected to set out in their</p>

Sub Issues	Officer response
	<p>Transport Assessments (which support a Planning Application), the measures needed to mitigate adverse impacts of generated travel demand and their associated costs (including on-going operating/maintenance costs). These measures will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that transport assessment will set out how the scheme design and mitigation measures will encourage traffic to use the most suitable routes. The Transport Assessment must also include an analysis of accident data and proposed mitigation measures.</p>
<p>Accident 'black spot' at Blackstitch Lane/ Middlepiece Drive/ Heathfield Road</p> <p>Blackstitch Lane will be a main artery and it is not up to the task despite anything that has been said to the contrary.</p>	<p>These matters will be considered within the more detailed Development Control process at both the pre-application and planning application stage. As set out in the Worcestershire LTP3, the promoters of new development will be expected to set out in their Transport Assessments (which support a Planning Application), the measures needed to mitigate adverse impacts of generated travel demand and their associated costs (including on-going operating/ maintenance costs). These measures will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that the Transport Assessment will set out how the scheme design and mitigation measures will encourage traffic to use the most suitable routes. The Transport Assessment must also include an analysis of accident data and proposed mitigation measures.</p>
<p>Can we have a clear statement about this dangerous site? Do the council/planners/ inspector /developer consider it to be safe?</p>	<p>The impact of development at this location will need to be considered, with a detailed review of the evidence, within the more detailed Development Control process at both the pre-application and planning application stage.</p>
<p>Development at Foxlydiat would force additional traffic onto Plymouth Road or Coldfield Drive, both of which require transit through Headless Cross traffic lights which is already a major bottleneck.</p>	<p>The junctions which have been identified as having the greatest potential for increased traffic movements have been modelled in the Highway Assessment.</p> <p>This junction was not considered to have sufficient increased impact from development across the Borough. The modelling for this</p>

Sub Issues	Officer response
<p>Windsor Rd is a bottleneck with the bridge for Birmingham area traffic, A441 north of Sainsbury's is a bottleneck</p>	<p>particular junction has been priced at approximately £3000 at a cost to the Council. The decision has been taken not to proceed with this work by Planning Advisory Panel.</p> <p>The Bromsgrove and Redditch Transport Network Assessment and Mitigation Reports (TNAMR) have identified locations where forecast traffic growth will result in junctions being at or over capacity, and identified schemes to mitigate the impact. It is expected that, in the event of the planned developments progressing to Planning Application stage, the promoters will develop detailed proposals for highway schemes which mitigate the adverse impacts of generated traffic. These mitigation measures will be considered by the Highway Authority within the more detailed Development Control process at both the pre-application and planning application stage as part of their assessment of the proposed development.</p>
<p>Parking congestion along Heathfield Road, Downsell Road, Springvale Road and at Webheath First School will be exacerbated with increased traffic numbers</p> <p>Increased traffic will cause congestion at M5 and M42 motorway junctions.</p> <p>Lydiate Ash junction (M5 J4) already solid at rush hour.</p> <p>Increased traffic will cause congestion at Burcot, Lickey End and Tardebigge.</p> <p>Congestion unlikely to disappear, especially junctions at peak times. Added volumes of traffic would be seen on alternative route of the B4096 Howell Lane, through Tutnall and Cobley and Burcot to Lickey End to junction 1 of the M42 or Birmingham Road for access to M5 J4. Drivers avoid Bromsgrove by taking Cur Lane into Copyholt Lane and other lanes to the west to access to M5 J5.</p> <p>Bromsgrove has its own housing growth needs and this will increase</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p> <p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p> <p><b>ACTION: Incorporate new criteria "<u>All proposals should discourage unintended through traffic (rat runs) within the development site and/or between sites.</u>"</b></p>

Sub Issues	Officer response
<p>commuting traffic by a similar amount of cars over the next five years, potentially increasing commuting traffic to around 6-8000 cars within this time scale.</p>	
<p>Bromsgrove bypass should go all the way to the M5.</p>	
<p>No improved transport links to the east of Redditch i.e. to London and Coventry. Discussions should be undertaken with Warwickshire Council</p>	
<p>Birmingham Road from Lickey End to Bromsgrove highway already seriously overloaded with standing traffic several hours per day, as is Birmingham Road in Bordesley from the end of the Alvechurch By-pass to the Sainsbury roundabout. These two bottlenecks will be completely swamped unless new roads are provided prior to developments. If not, Hewell Lane from Lickey End to Foxdiatate Roundabout, already in very poor state and has a poor accident record, will become more of a rat run.</p>	
<p>Increased traffic will impact on A448/A38 roundabout junction at Bromsgrove and Morrisons junction at Winyates. What studies have been completed to alleviate this?</p>	<p>Morrisons Island was one of the junctions assessed through the Halcrow transport modelling. It is not listed as one of the improvements in the Transport Schemes document.</p>
<p>Land between Morrisons and Mappleborough Green has been built on so land is not now available to dual this section of road even though provision was made several years ago.</p>	<p>Road reserve has been removed (BORLP3), but the land has not been built upon. This stretch is not identified as being in need of improvement.</p>
<p>New interchange required for site access to existing road system, causing significant disruption for residents</p>	<p>This is a temporary matter. All development causes a certain level of disruption to existing residents during construction; however this can be controlled through planning conditions.</p>
<p>Widening roads will be difficult and distressing i.e. Church Road and Foxlydiatate Lane as some properties front the road directly.</p>	<p>There is no reference within the consultation documents to road widening.</p>
<p>Claims that roads will be 'improved' simply translate as 'widened', this means speeds and traffic volume will increase.</p>	
<p>Key roads in Webheath do not benefit from modern safer design that</p>	<p>Accept that there is a difference between the road systems in the</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>encompasses an enhanced understanding of safe road system design. Other parts of Redditch has avoided through roads that do not have driveways that exit directly onto carriageways carrying traffic that is travelling through the area.</p>	<p>former New Town and other parts of Redditch's urban area. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>Have Highways or developers done a Risk Assessment about increased traffic and the potential increase of accidents?</p>	<p>These matters will be considered within the more detailed Development Control process at both the pre-application and planning application stage. As set out in the Worcestershire LTP3, the promoters of new development will be expected to set out in their Transport Assessments (which support a Planning Application), the measures needed to mitigate adverse impacts of generated travel demand and their associated costs (including on-going operating/maintenance costs). These measures will be considered by the Highway Authority as part of their assessment of the proposed development. It is expected that the Transport Assessment will set out how the scheme design and mitigation measures will encourage traffic to use the most suitable routes. The Transport Assessment must also include an analysis of accident data and proposed mitigation measures.</p>
<p>Roads visibly damaged as a result of the volume of traffic</p>	<p>This is a Highways Maintenance issue.</p>
<p>More traffic detrimental to local residents particularly children.</p>	<p>This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage.</p>
<p>Increased traffic noise and pollution.</p>	<p>This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage.</p>
<p>Increased traffic would also include more vans and lorries due to the growing trend for internet shopping</p>	
<p>There are humped back bridges some with weight restrictions.</p>	<p>Noted.</p>
<p>More Redditch commuters travel to work to Birmingham, Webbeath is geographically furthest from Birmingham or public transport links than other areas.</p>	<p>The most popular employment destination for Redditch residents, are locations within Redditch. All focussed area appraisal sites link onto the strategic road network.</p>
<p>Quickest route to M42 is not via A448, as most people know or would get to know, because these houses will inevitably be purchased from out of town people commuting to Birmingham (knock on doors on</p>	

Sub Issues	Officer response
<p>local new sites to gain evidence), and drivers will instead cut through Burcot or Bordesley.</p>	
<p>How does Foxlydiate / Bentley site, planned to feed onto the A448 “stop migration away from Redditch”?</p>	<p>The exact details of the new transport arrangements will not be known until a detailed Transport Assessment is undertaken.</p>
<p>To maintain rural character and protect conservation area and villages adjacent, ensure that access to Gypsy Lane was restricted to pedestrians and cyclists with vehicular access to and from new development only via a new entrance and exit from the A448.</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>Buntsford Park likely to be the next accident black spot due to additional traffic volumes. Cars parked on both sides of the road making vision very poor.</p>	<p>200 dwellings is the trigger for a through route as opposed to a cul de sac. Any road network would be designed in accordance with the Highway</p>
<p>If no more than 200 dwellings can be accessed off a single road, how many access points would development in this location create?</p>	<p>The developer of any site would be required to undertake the works necessary to mitigate the impacts of the development on the existing highways and for the provision of a range of necessary new transport infrastructure, including sustainable transport.</p>
<p>It is not clear who would finance these works.</p>	<p>Worcestershire County Council (WCC) salts approximately 2,191km of road. Our Winter Service Policy sets out the principles that are used to meet the obligations and duties in respect of the winter service. The objectives of the winter service, as far as reasonably practicable, are to ensure the safe movement of vehicles and pedestrians on the highway network and to minimise delays, accidents and damage to the highway resulting from ice and snow.</p>
<p>The A448 Bromsgrove Highway is subject to road traffic crashes as a result of icing to the carriageway</p>	<p>WCC prioritise the routes comprising the Principal Road Network, the A448 forms part of this network. Treatment takes place in accordance with the available forecast (weather information is obtained from specialist forecasters, roadside monitoring stations and supplementary patrols). WCC use a pre-wet solution to improve the effectiveness of granular at lower temperatures, however, this is often not visible on</p>

Sub Issues	Officer response
	<p>the road and the public may perceive that we've taken no action.</p> <p>Throughout periods of severe weather, WCC regularly publish press releases to advise motorists of the current weather situation and intended gritting actions and the website is similarly updated. WCC do encourage the public to report any known areas of difficulty (<a href="http://www.worcestershire.gov.uk/cms/my-self-service/report-it/gritting-ice-and-snow.aspx">http://www.worcestershire.gov.uk/cms/my-self-service/report-it/gritting-ice-and-snow.aspx</a>) and, subject to available resources, WCC carry out ad-hoc gritting where they can.</p> <p>WCC have examined their records and are not aware of any major problems during the last winter season on the Bromsgrove Highway. WCC do endeavour to salt before the rush hour traffic as it is a heavily used road but it goes without saying that drivers should always drive with caution and temper their driving according to the conditions.</p>
<p>The 'Identified Highway Schemes Required' if development proceeds either in Area 4 or Area 6 indicates that some 34 No junctions will need to be improved to allow traffic to move freely and safely. To complete all would be very costly, time consuming and disruptive to existing traffic.</p>	<p>The upgrading of existing junctions is a typical requirement on the back of developments in any area. In any case the list of schemes are not only related to sites 1 and 2, they also relate to improvements needed as a result of all developments across the Borough, and outside of the Borough.</p>
<p>Slideslow roundabout likely to be at saturation point due to existing heavy flows of traffic, improvement schemes would not be productive.</p>	<p>The transport schemes identify that this junction will require enhancements as a result of development pressure from all developments across Redditch and Bromsgrove.</p>
<p>A38 between Stoke Heath and Lydiate Ash has a large volume of traffic already, it's unlikely that improvement work would improve the traffic flows</p> <p>Accidents on M5 and M42 cause significant disruption to A448 and A38 because they are used as a diversion. A38 traffic backs up to Slideslow Roundabout which in turn gridlocks traffic on the A448 and traffic backs up from Bromsgrove to Foxlydiate and onto the A4189 and beyond.</p> <p>Development likely to exert main pressure on A448, Slideslow</p>	<p>The transport schemes identify that junctions along the A38 will require enhancements as a result of development pressure from all developments across Redditch and Bromsgrove.</p>

Sub Issues	Officer response
<p>roundabout and A38 northwards to Junction 1 of M42. These locations require detailed study to assess specific impact and mitigation required, although similar impacts are felt from other development scenarios.</p> <p>Farm vehicles already have difficulty</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem.</p>
<p>Getting from the site to the town centre and employment areas will create more local traffic</p>	<p>This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage.</p>
<p>One access point to the A448 may not provide enough capacity, so additional access may be needed at Foxlydiat Lane. Bringing Foxlydiat Lane up to standard will be costly and community would not want it.</p> <p>The only way to persuade drivers to the main routes would be to ensure only one access/egress at the A448 junction but this wouldn't be safe or viable, expensive for the developer and would disrupt the local community</p>	<p>Until a detailed transport assessment is undertaken it is not known what the capacity of the 'Foxlydiat junction' is to take new development, however it is likely that a re-design of the junction will be required to ensure that the junction has capacity. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>Curr Lane and Pumphouse Lane unsuitable to be used to access the 800 dwellings.</p>	<p>It is not clear what this reference to 800 dwellings is referring to. For site 1 a Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>To achieve adequate sight lines and safe access and egress would require substantial engineering and re-alignment works</p>	<p>A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>Underestimation of construction traffic particularly relevant to A448 and Callow Hill Cross Roads.</p>	<p>This is a temporary matter. All development causes a certain level of disruption to existing residents during construction, however this can be controlled through planning conditions.</p>
<p>Will provide scope to provide a link road from Foxlydiat junction through Area 1 to connect with an improved junction with Church Road and into Area 2 to allow for potential road link to proposed new housing on the ADR site to the south-east. This would inevitably reduce volume of traffic from the ADR site that will need to filter through the Webheath area to reach the wider highway network.</p>	<p>Noted</p>
<p>A district centre and primary school within the first phase of Area 1</p>	<p>Noted</p>

<b>Sub Issues</b>	<b>Officer response</b>
will reduce the volume of traffic leaving the boundaries of the development area.	
Access to A448 works against Policy 19 (v) of Redditch Local Plan No.4 so site should be removed from consideration	Policy 19 concerns the addition of new accesses. Site 1 is able to access the A448 through the upgrading of an existing junction.
Development here improves viability for travelling past Bromsgrove on to M42, towards Birmingham and beyond	Access is direct to the Strategic Road Network for all the focussed site areas enabling easy access to a range of destinations.
Main pressure exerted on A448, Slideshow Roundabout and A38 to M42 J1 thus proving the majority of traffic will head away from Redditch, negating the strategy to re-vitalise Redditch Town Centre.	Whilst some pressure will be added to the Slideshow roundabout and other junctions in Bromsgrove, the majority of the transport schemes required within Redditch are needed because of development pressure from all sites that are envisaged to be developed across the Borough. Access is direct to the Strategic Road Network for all the focussed site areas enabling easy access to the Town Centre.
Department for Transport predicts that transport growth expected to resume as the economy recovers and road travel will increase by approx 33% from 2011 – 2035. Over twenty years there's a trend to a large long term increase in car and light van ownership in the West Midlands. A further trend is to more and longer journeys especially to workplaces in the West Midlands Metropolitan Area and to changes in retailing leading to the evolution of new shopping journey patterns. An increased number of people have been predicted for Redditch generating increased travel needs (not simply in the local area) and could accentuate these trends.	Noted. The trends in future car based travel have been taken into account in the projected traffic increases undertaken as part of the Halcrow transport modelling.
No mention of likely increased pressure on minor highway network in and around Site 1. A study of traffic patterns locally would show significant levels of local and non-local traffic using minor roads and heavy goods traffic from agricultural employment. Minor roads, many single track and very poor condition not capable of accepting large traffic increases	A high level assessment of the impacts of different growth scenarios around Redditch was undertaken in tandem with the HGDS. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.

KEY ISSUE: Transportation – Walking, cycling and horse riding

<b>Sub Issues</b>	<b>Officer response</b>
Speeding traffic dangerous for walkers, cyclists and equestrians. Increased safety risk for children walking to school and OAP's using	The impact of development at this location will need to be considered, with a detailed review of the evidence, within the more detailed

Sub Issues	Officer response
the local grocery store	Development Control process at both the pre-application and planning application stage.
Many roads lack pavements	New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network or for provision of walking or cycling routes are required.
Safety concerns crossing the A448. No thought given for pedestrian walkways. residents will cross to access main bus route to Bromsgrove along B4096	The impact of development at this location will need to be considered, with a detailed review of the evidence, within the more detailed Development Control process at both the pre-application and planning application stage.
Threatens public rights of way for walkers	Public rights of way would be required to be maintained as part of any development
Number of footpaths and public rights of way could have a negative impact on the enjoyment of rural pursuits	
What's proposed regarding the only two Bridleways in this area? Plans show intention to build on two bridleways in Webbeath.	Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.
Cur Lane used at least twice weekly by Redditch Road and Path Cycling Club as return route to Redditch.	
National Cycle Route 5 passes through, and is clearly signposted on quiet lanes at Church Road. No clear proposals for handling of route 5.	
Increased cycle use is key to sustainable transport yet there is no clear explanation as to how this will be achieved for cyclists. Arrow Valley Runners Club meet at Morton Stanley Park and head along country roads through Webbeath and beyond	
Cycle usage will not increase as too many people rely on cars	The Policy requires improvements to passenger transport and other more sustainable modes of transport to encourage modal shift.
District Centre and school located to the east of the site and will therefore be within walking and cycling distance for Webbeath residents.	Noted

<b>Sub Issues</b>	<b>Officer response</b>
Development will include improvements to walking and cycling network and will respect existing public rights of way	Noted
Footpath network and cycling routes along lanes testify to the high amenity value. Sustrans National Cycle Route runs through Bentley Pauncefoot parish and acts as an important natural link between densely populated areas in the north towards the M42 and the wider Worcestershire countryside to the south. Constructed links through a major housing development would not compensate for the loss of long established country routeways.	Public rights of way would be required to be maintained as part of any development. Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.
Walking and cycling not only environmentally benign but socially advantageous since opportunities for primary contact with fellow residents are enhanced.	Noted
NPPF para 38 states that, where practicable within large scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. Institution of Highways and Transportation "Guidelines for Providing Journeys on Foot" (2000) suggests acceptable and desirable walking distances. It is desirable that town centres are within a 200 metre walking distance, commuting and schools 500 metres and elsewhere within 400 metres. Due to the size and shape of Site 1 it is likely that it would be problematic to locate key facilities on this site within acceptable walking distances. Topography of Site 1 and the barrier-like effect of the major roads discourage the use of pathways.	The HGDS referred to the acceptable walking distances which are more up to date for this kind of assessment. It assessed distances to a range of facilities, and this was used consistently in assessing the distance to all potential sites. It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.
Public footpaths and bridleways could provide increased recreational opportunities, including the potential improvement of the footpath network, provided they are sensitively integrated into new development.	Noted

**KEY ISSUE: Water**

<b>Sub Issues</b>	<b>Officer response</b>
A high level of risk of contamination by pathogens to the drinking water at the Curr Lane wells	Development is not allowed to pollute groundwater wells; this will be ensured through the planning application process in consultation with the Environment Agency and Severn Trent Water Limited (STWL).

<b>Sub Issues</b>	<b>Officer response</b>
<p>Curr Lane Wells are 'compensation boreholes' used to top up normal water flows in the Bow Brook to compensate for groundwater abstraction for water supply. The brook water is currently "very good status". Any new development of the scale proposed has the potential to contaminate the wells.</p>	
<p>There is borehole water extraction at Curr Lane, a large number of proposed properties would be built above extraction/pumping level, these are problems for the future if development goes ahead</p>	<p>There are two recorded boreholes and one possible borehole within the site in the vicinity of Curr Lane however these do not present a significant constraint to development of the site.</p>
<p>Swann Brook: The level of investment required to manage the storm and run off from the site will not be insignificant and any failure and resultant pollution will have a deleterious effect not just on the indigenous wildlife but also on the rural economy and potentially human health.</p>	<p>The water run-off from the site will need to be managed to ensure that additional flows are not created. This will be ensured through the planning application process in consultation with the Environment Agency and Severn Trent Water Limited (STWL).</p>
<p>SUDS: building on Redditch marl is not ideal</p>	<p>There are a variety of SUDS techniques available which can be implemented on sites throughout and around Redditch.</p>
<p>A water main crosses the southern portion of the site from north-east to south-west. The main is 450mm diameter and sits within a ten metre wide easement. It is anticipated to be a substantial supply main serving the Redditch area and diversion is not considered to be a viable option.</p>	<p>Noted</p>
<p>Unlikely that a service will be taken from the 450mm diameter main through the site. Assumed that reinforcement of local network may be necessary; invariably the case with edge of town developments.</p>	<p>Noted</p>

KEY ISSUE: Miscellaneous

<b>Sub Issues</b>	<b>Officer response</b>
<p>The TW application cannot be determined in isolation and should be looked at as part of the wider local plan.</p>	<p>It can be determined in isolation. Planning applications will be determined in line with relevant material planning considerations.</p>
<p>Webheath is a village and an established and thriving community. It WILL be destroyed if the proposal for 3000 houses is approved. In terms of community cohesion or social engineering/planning terms, is it advisable to increase a 'village' by two thirds?</p>	<p>Perceptions of whether Webheath is part of Redditch town or a separate village are simply that, perceptions. It has been the case for a long time in planning policy terms that Webheath as an area, has been included within the urban part of Redditch town.</p>



Sub Issues	Officer response
<p>I cannot understand how anyone would deliberately set out to upset long-term residents of Webheath Village</p>	<p>Irrespective of whether or not Webheath is a village, it is anticipated that any new residents can be integrated into the existing community. The planning system has not been set up to upset residents, however it is acknowledged that new development in any community may be at least initially resisted.</p>
<p>At least if building were confined to the Bromsgrove area along the highway, there would be no residents to antagonise.</p>	<p>It's the job of the planning system to establish the best location for development irrespective of the number of people affected or perceived to be affected.</p>
<p>It seems to me that there is a bias opinion that is prevailing against common sense.</p>	<p>The Redditch Growth Report is unbiased evidence to support the locations for growth.</p>
<p>I do not want our home to be devalued any more that the current economic climate had done. Affordable housing will drastically reduce the value of properties in this premium area (Bentley)</p>	<p>Property value is not a material planning consideration.</p>
<p>I quote page 66, section 7.08 "Neither Winyates Triangle nor Ravensbank are in the Green Belt and 5.8 ha of the Bordesley Employment site is part of the Brockhill ADR. The three areas will also meet different needs with Ravensbank being suited to B2 and B8 uses whilst Bordesley and Winyates Triangle are gateway B1 sites serving the west and east of the town respectively." Section 7.11 states "Whilst the Brockhill ADR west of the railway could be regarded as a sustainable location given its proximity to the town centre the site is compromised due to its topography and relationship to the adjoining countryside. The site also has a limited capacity of 308 dwellings based on the North West Redditch masterplan. There is capacity at Bordesley Park to accommodate either growth option and if our recommendation were to be adopted there would be no need to consider additional urban expansion sites within the plan period up to 2026 at the earliest." With concerns of Webheath ADR sustainability, the Council stated 'In our view the Webheath ADR is not suitable for development due to the poor linkages with the town centre and employment areas, the quality and character of the landscape, the restricted highways network and difficulties in providing foul drainage.' There have been no changes to this area of Webheath since 2009, so nothing has changed, it is no more</p>	<p>The document being referenced is the 'Study into the Future Growth Implications of Redditch Second Stage Report' (WYG 2). Reference to documents which conflict the proposals put forward in the HGDS are not relevant as WYG2 was largely discredited by the WMRSS Panel Report recommendations.</p>

Sub Issues	Officer response
<p>sustainable than it was in 2009.</p> <p>NPPF states <i>"Pursuing sustainable development requires careful consideration of viability and cost in plan making and decision making"</i> and <i>"the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"</i><sup>1</sup></p> <p>(<sup>1</sup> NPPF. Ensuring viability and deliverability. To ensure viability, the cost of any requirements likely to be applied to the development such as affordable houses, infrastructure contributions, should, when taking into account the normal cost of development and mitigation provide competitive terms for a willing landowner and a willing developer to enable the development to be deliverable)</p> <p>This site will and always be an isolated site that will have no benefit to other residents unless all facilities are provided then, as can be seen in the "New Town" area antisocial behaviours will follow in future years</p>	<p>There is no evidence at this stage to suggest that any of the developments around Redditch are unviable.</p> <p>Viability of the plan will be tested prior to publication</p>
<p>Existing residents will be extremely upset for many years with building / disruption / pollution / environmental disintegration etc. It will have similarities to HS2 in length of build, construction on going pollution, noise, social problems - properties will be blighted for many years if in the current climate the houses do not sell due to being isolated in no mans land in Bromsgrove but on the outskirts of Redditch</p> <p>Potential residents of new development would prefer their houses to back onto a golf course/ country park rather than existing houses. Therefore, providing housing immediately adjacent to current existing housing in Redditch at</p>	<p>There is no evidence to suggest the site will be isolated. It is anticipated that any new residents can be integrated into the existing community, the requirement for new facilities have been included in the policy and will be of significant benefit to both exiting and future residents.</p> <p><b>ACTION: Ensure the policy encourages community safety by incorporating the principles and physical security standards of the 'Secured by Design' award scheme or ensure there is reference to this elsewhere in the BDC plan.</b></p> <p>It is acknowledged that development anywhere will cause additional noise and disruption during construction; however this is considered to be only temporary. Planning conditions can be used to limit the level of disturbance during the construction phase.</p>
<p>Potential residents of new development would prefer their houses to back onto a golf course/ country park rather than existing houses. Therefore, providing housing immediately adjacent to current existing housing in Redditch at</p>	<p>It is not feasible for all development to back onto golf courses and country parks. Having an adjoining existing community with the proposed area will allow for better community integration with the existing urban area.</p>

Sub Issues	Officer response
<p>Webheath should not be a major decision making factor</p> <p>How does this plan enhance and improve the places in which we live our lives? (NPPF, The Right Hon Greg Clark MP)</p>	<p>As a local authority we have a duty to plan for the future housing and employment needs of the town. Development may lead to enhanced transport, education and other facilities.</p>
<p>More housing will bring an increase in crime</p>	<p>The crime impact of any new development is taken into account. Early involvement of the Council's Community Safety Team, (in partnership with the West Midlands Crime Risk Advisor) provides crime prevention design advice for planning applications.</p> <p>The Councils are aware that this level of growth carries significant infrastructure implications for the police service and the Police Service will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch.</p>
<p>Residents of new homes will be left in no-mans land with inadequate services paying Bromsgrove council charges but mainly needing to use Redditch facilities</p>	<p>The development will create the need for new services and facilities and appropriate Council tax from the appropriate authority will be required. Development in this location will create a balanced community that fully integrates into the existing residential area of Webheath.</p>
<p>Make into a 'garden site' not a housing estate, each property should have a tree and shrub of British native species, street corners with groups of trees, some roads tree lined</p> <p>Development will destroy the rural character of Bentley</p>	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure.</p>
<p>If development must go ahead in Foxlydiate consider affordable accommodation placement. Build near to Batchley and Brockhill where most are council homes and only private alongside private houses in Webheath and Foxlydiate Lane.</p>	<p>Whilst all areas surrounding Redditch would experience a change from a rural character to an urban character, it is not an issue exclusive to this site. The requirements for housing require that land is found to accommodate the development.</p> <p>The policy requires that residential development should reflect the local requirements as detailed in the most up to date housing market assessment and comprise of up to 40% affordable housing with a flexible mix of housing types and tenures. These should be integrated, or pepper potted, through the development to ensure that the new development is vibrant and mixed.</p>
<p>Foxlydiate/Webheath and Bentley area (Site 1) are clean and rubbish free, with more houses there is a good chance of them becoming a dumping ground with litter, graffiti and property damage (reference to</p>	<p>This is not a planning matter.</p>

Sub Issues	Officer response
<p>other council estates in Redditch).</p> <p>RBC have a duty to consider residents health and wellbeing, (and are partners in wellbeing board). Our living environment forms an essential part of wellbeing. This proposal will spoil current leisure and relaxation found in the location</p>	<p>This is considered in the analysis of the sites and the sustainability appraisal accompanying the HGDS, this includes social well-being where there is an acute shortage of houses to meet people's needs. Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.</p>
<p>Extension of the urban areas of Redditch along the A448 Bromsgrove Highway will mean that Redditch will dominate Bromsgrove economically, politically and population.</p> <p>Economically Redditch will increase its dominance over Bromsgrove as the place to go for commerce, retail and commercial. Resulting in a decrease in retail and commercial businesses operating from the area and reduction in employment, increased vacant properties and local tax take will reduce. This will create building opportunities through change of use of industrial areas? In order to protect the current Bromsgrove economy a site north of Redditch would be preferable creating two distinct areas?</p>	<p>This is not a likely outcome, and no evidence has been provided to confirm that a site north would prevent this happening; the towns are separate and have their own identities and roles to fulfil.</p>
<p>Are the council going to pay compensation to those who's conditions/ quality of life may be worsened by development?</p> <p>The amount of 'social housing' planned, but not widely acknowledged is totally out of character with the area and will necessitate considerable costs.</p>	<p>There is no liability on the planning department for issues in the development stage</p> <p>Irrespective of concerns, the policy requires that residential development should reflect the local requirements as detailed in the most up to date housing market assessment and comprise of up to 40% affordable housing with a flexible mix of housing types and tenures. These should be integrated, or pepper potted, through the development to ensure that the new development is vibrant and mixed.</p>
<p>Planning permission previously denied to build in Webheath because of moving sand problems and unsecure ground to build on.</p>	<p>This was not a refusal reason for Webheath ADR proposals. There are no known minerals deposits of concern within Site 1.</p>
<p>People have chosen to live in Webheath and this Plan wrecks their social aspirations.</p>	<p>Noted</p>
<p>The following Agencies have concerns with the Redditch Growth plan</p>	<p>Disagree, these stakeholders are invited to comment on the proposals</p>

<b>Sub Issues</b>	<b>Officer response</b>
and BORLP4: Severn Trent (Paul Hurcombe), EA, Worcestershire Framework Directive, Worcestershire Highways Dept, Biodiversity Area Statement, Worcestershire Wildlife Trust, Meteorological Office, WYG (2)	and are required to feedback to the Council's in order to refine proposals or improve the policy. Reference to documents which conflict the proposals put forward in the HGDS are not relevant as WYG2 was largely discredited by the WMRSS Panel Report recommendations.
Site 1 does not comply with NPPF p.8 "When considering edge of centre and out of town proposals, preference should be given to accessible sites that are well connected to the Town Centre".	This is in reference to town centre uses and their location being preferable within or on the edge of existing town centres.
Photographic evidence submitted by E Morris and saved on Joint Shared Drive	Noted.
Working population gravitates to where there is appropriate employment. The most attractive areas employment-wise are those that provide choices to enable employment flexibility and to maximise people's potential.	Noted.
Council has been deflected in what should be a focussed appraisal, into seeking to achieve social gains to existing areas when the focus should be to achieve the most sustainable development which minimises harm to Green Belt purposes and areas of heritage and environmental sensitivity. Social benefits to Webheath can be achieved from a smaller Site 1 which avoids serious harm to the Green Belt and landscape.	The development principles used to analyse all of the sites factor in a number of concerns which the chosen sites should address, including green belt purposes and other environmental matters. The social benefits of a site are not an overriding concern which favoured Site 1 more than site 2 or some other areas.
Considerable uncertainty over deliverability of 2,800 dwellings in the Plan period in addition to 600 dwellings anticipated on Webheath ADR. Implied delivery rate of 3,400 dwellings in this location is significantly in excess of 200 dwellings per year to 2030, allowing for the lead-in time required. An alternative strategy that limits development to approximately 1,500 or 1,600 dwellings represents a more realistic strategy which could be deliverable.	The delivery of the site would require approximately 160-170 dwellings per annum. The plots can be sold to separate house-builders who can deliver different types of houses to the market at the same time.
No evidence of a masterplan being done for this site so can there be a realistic prospect of delivery on this site?	The evidence required to understand the constraints and necessary improvements has been completed, and developers have submitted masterplans for the site.
No evidence that any discussion has taken place between developers and the Councils. Cannot see how site 1 can be delivered within five years	These discussions have been on-going.

<b>Sub Issues</b>	<b>Officer response</b>
Opportunities exist to provide housing in area 5, parts of area 7, 8 and 11 and by utilising Redditch's generous green space.	20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations. Open space sites generally contain important ecological designations or have archaeological value and also form an important part of Redditch's sports and recreation provision.
Query number and distribution of 'tips' in the area covered by your Plan No.4 'Foxlydiat' and confirming your policy in restricting development to within 200m of said 'tips' and your policy as to vapour barriers and vents	It is not understood what the respondent is referring to.
Since builders can self certify building regulations builders can depart from legitimate requirements that the rest of us have to abide with	All development must be built to Building Regulation standards.
Should the north Webheath site proceed, it could take 3-4 years before sewerage capacity improvements are complete and any planning permissions will need to take note of this timeframe.	Noted, phasing will be required on both sites 1 and 2.

**Site 1 – Foxlydiat (Area 4) - SUPPORT**

KEY ISSUE: Support for development of Area 4

<b>Sub Issues</b>	<b>Officer response</b>
Number of Areas allocated for development in Local Plan 4/ Cross Boundary Growth Expansion (2030) should be kept to a minimum to minimize overall impact. No one Area can provide the full requirement so limit development to 2 Areas maximum. (Areas 4 & 6)	Noted, this is what the HGDS proposes.
I think you are choosing reasonably well	Noted.
Support Site 1. It is essential that Bromsgrove and Redditch identify further land to accommodate their housing needs. Consider that the two Authorities have given full consideration of alternative locations.	Noted.
Support Site 1. It is important that the view of new development is shielded by some appropriate tree planting, to maintain the longer range views of the countryside.	Noted.

Sub Issues	Officer response
Support Site 1 since it is expansion of existing housing and so will simply make larger, joined up, communities.	Noted.
Preferred option fairly distributes the housing requirement for between 2 sites, thereby using 2 main arterial roads (A448 to Bromsgrove/Worcester and A441 to Birmingham)	Noted.
Area 4 allows easy access to Redditch town centre via existing roads	Noted.
Support for the SWOT analysis in the Housing Growth Executive Summary	Noted.
Welcome proposals that development of the sites would include provision of green infrastructure and the steps taken so far to identify existing landscape and nature conservation interests and sensitivities.	Noted.
Welcome the attention given to flood risk – one of our [National Trust] ongoing concerns is risk of flooding to the historic property in our care at Coughton Court. This could be affected by development upstream at Redditch. Would look for SuDS to address impacts on the wider catchment as well as the watercourses most closely related to the sites.	Noted, this will be explored with the developer.
Foxydiate and Webheath would benefit from the improvements to local infrastructure and other community facilities.	Noted.
Ideally suited for quick access to the A448, which opens up opportunities to travel in either direction for work opportunities and to revitalise both town centres	Noted.
The vast majority of Site 1 lies in Flood Zone 1 based on 'indicative' Flood Zone Map. However, there is an ordinary watercourse (Spring Brook) and its tributaries within the site boundary. Spring Brook has an associated floodplain only up to Cur Lane. Above this, the catchment size is less than 3km <sup>2</sup> . Floodplain extents for Spring Brook are not based on a detailed hydraulic model but on a national, generalised flood mapping technique which ignores the presence of structures such as bridges and culverts and the potential impacts of blockages.	A site specific flood risk assessment is being completed for Site 1 in consultation with the Environment Agency.
Given the site size, the small catchment size of the watercourses and	Noted.

Sub Issues	Officer response
topography, the majority of the site would be located within Flood Zone 1 where development is appropriate (in considering fluvial flood risk).	
Landowners are working together to secure the delivery of the site	Noted.
Support cooperating between authorities and that Foxlydiate represents a sustainable location for meeting future housing needs for Redditch	Noted.
Site 1 represents a suitable, available and deliverable option to secure cross boundary growth	Noted.
Note and support the reduction in overall size of this area based on the reduced likely impact on adjacent Local Wildlife Site (LWS – previously known as SWS) woodlands a smaller development area will bring. However we continue to believe that careful protection of these sites will be important.	Noted, the HGDS considered these constraints
Support proposed integration of SUDs and protection of the watercourses within a comprehensive GI network.	Noted.
Webheath represents a sustainable community within Redditch. There is considerable scope for enhancement of local services and facilities, which the development could deliver to the betterment of future residents and existing community.	Noted.
Site 1 defined by strong, readily recognisable and defensible boundaries formed by the Bromsgrove Highway to the north-east; Foxlydiate Lane to the south-east; Pumphouse Lane to the south; strong natural features such as mature hedgerows and a stream to the west; and Cur Lane and Gypsy Lane to the west and north-west.	Noted.
Can be considered as three adjoining areas capable of being developed comprehensively on a phased basis over the Plan period. Area 1 (rear of the Foxlydiate Arms); Area 2 (south of Cur Lane); and Area 3 (north of Area 1 and north-east of Cur Lane and Gypsy Lane). Area 1 can reasonably be considered as a first phase, with Area 2 as a sensible second phase and Area 3 as a potential third phase.	Noted
The basic concept would be to provide development at a medium density, which might be reduced towards the fringes of the various areas, where sensitive landscape or other environmental or technical	Noted, this can be refined in the design of the development.



Sub Issues	Officer response
<p>issues suggest that a lower density might be more appropriate.</p> <p>Growth Option 1 area could average around 35-40 dwellings per hectare (DPH), which when applied to a notional net developable area of around 67%, would equate to 75-80 hectares capable of accommodating around 2800 dwellings, plus extensive areas of public open space as broadly indicated on the concept plans.</p>	Noted.
<p>Area 1 and 2 might each accommodate in the region of 1000 dwellings, whereas the reduced Area 3 could accommodate around 800 dwellings, with the remainder to the north, retained as open land or woodland.</p>	Noted.
<p>Area 1 would accommodate a Local Centre comprising a Primary School (which would be capable of being enlarged); plus a small group of shops and possibly a health centre (doctors and dental surgeries and possibly a chemist). The school could be located towards the eastern edge of the site, so as to be well positioned in a very accessible location with good vehicular and pedestrian linkages and as close as possible to the existing urban area of Webheath, which it could also serve.</p>	Noted.
<p>Foxydiade sector (reduced Area 4 of Scenario 2) - This land will provide a natural extension to Webheath. Accordingly, we find it difficult to oppose its development.</p>	Noted.
<p>Pumphouse sector - This constitutes a considerable extension of Redditch, protruding into Green Belt. It should be on the reserve list, to be used only if sufficient land cannot be found elsewhere. Spring Brook is a robust boundary, and is lined by trees, which (until they are mature and are felled for timber) shields the sector from the countryside to the west around Upper Bentley. If the area does have to be taken out of the Green Belt, suggest that there is an alternative boundary considered in the form of a continuous hedge (or fence) from Cur Lane at SK010669 to SK00756630. After that the boundary would cut across a field to Pumphouse Lane at SK 007661. There it would meet the suggested extensions to the Webheath ADR, with hedges leading straight across the valley to Crumpfields Lane at SK012656.</p>	Noted.

<b>Sub Issues</b>	<b>Officer response</b>
English Heritage agrees with the recommended preferred option [Area 4 (Site 1) and Area 6 (Site 2)] and their proposed spatial extent	Noted.

**Site 2 – Brockhill East (Area 6)**

KEY ISSUE: Support for development of Area 6 general comments

<b>Sub Issues</b>	<b>Officer response</b>
The number of Areas allocated should be kept to a minimum to minimize overall impact. No one Area can provide the full requirement so limit development to 2 Areas maximum. (Areas 6 & 8)	20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. Area 8 is not a preferred location.
Will address the need for first time buyers Infrastructure is already in place	This is true for all potential development areas. All sites will require new infrastructure provision to support development.
I think you are choosing reasonably well	Noted.
Support Site 2. It is essential that Bromsgrove and Redditch identify further land to accommodate their housing needs.	
Support for the SWOT analysis in the Housing Growth Executive Summary	
Accept that Site 2 seems a suitable choice for development at the scale proposed	
The Authorities have given full consideration of alternative locations. Support extension of Redditch Local Plan No.4 to include Area 2 which includes land owned by our clients, Worcester Diocesan Board of Finance Ltd off Brockhill Lane.	Support noted. This land falls within the proposed Site 2 boundary.
Support Site 2 since it is an expansion of existing housing and so will simply make larger, joined up, communities.	Noted.
Preferred option fairly distributes the housing requirement between 2 sites, thereby using 2 main arterial roads (A448 to Bromsgrove/Worcester and A441 to Birmingham)	Noted.
Brockhill would benefit from the improvements to local infrastructure and other community facilities	Noted.
Site 2 is mainly located on Secondary Aquifers and is therefore	Noted.

<p>considered to be a 'low risk' site in terms of controlled waters receptors adjacent to Weights Farm Landfill, regulated by us (Environment Agency). It is an inert landfill site that receives relatively low quantities of waste. We have no substantiated records of any complaints/ issues associated with its operation. Whilst it should be taken into consideration during the design and layout we do not envisage proposals would significantly impact on the ability of the operator to meet the conditions of their permit.</p>	
<p>Site 2 accommodates a modest extension of some 600 to 670 dwellings to the Brockhill East Strategic Site identified in the Draft Redditch Local Plan No 4.</p>	<p>Noted.</p>
<p>Has benefit of being part delivered, with the remainder subject of masterplanning exercises and subject of advanced pre-application discussions.</p>	<p>Noted.</p>
<p>Brockhill East will take development to RBC boundary; it's close to the town centre and existing and planned employment mean that it is logical to look beyond it into the Green Belt</p>	<p>Noted.</p>
<p>Can form a cohesive new neighbourhood centre on the planned relocation of the Holyoakes First School, playing fields and a new district centre.</p>	<p>Noted.</p>
<p>English Heritage agrees with the recommended preferred option [Area 4 (Site 1) and Area 6 (Site 2)] and their proposed spatial extent</p>	<p>Noted.</p>

KEY ISSUE: Objection to development of Area 6 general comments

<p><b>Sub Issues</b></p>	<p><b>Officer response</b></p>
<p>Brockhill is already a large housing estate and is continuing to grow. To locate a further major development adjacent would give a continuous unrelieved urban sprawl across the North of Redditch and the proposed islands of biodiversity would be so isolated as to be virtually worthless.</p> <p>Important wildlife habitat</p>	<p>Any habitats or species survey completed would identify where and what type of mitigation would be required in order to facilitate the development, therefore biodiversity would be maintain or enhanced. The Policy states that "sites will have an overall strategy and management plan for green infrastructure which maximises opportunities for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity." The proposed site 2 would be contained by the proposed new Green Belt boundary at Weights lane so it would not be permitted to sprawl northwards</p>

Reduction of good quality agricultural land and the loss amenity value to the residents. Agricultural value	Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development.
Area used for recreational purposes	Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.
WYG2 (p.97) states that natural habitat has only 'limited value'. Community woodland has now been planted in this location	The community woodland will be designated in the Redditch draft Local Plan No.4 as open space within the Brockhill East Strategic Site and as part of the masterplanning of the strategic site it is clear that there is no willingness to build here. It is unlikely that there would have been a significant change in ecological status, however the WYG 2 documents are not what was consulted upon as part of the HGDS
Infrastructure is compromised by electricity surges and power drops	<b>ACTION: Amend RBC Policies map</b> On any site, electricity supply is not considered to be an issue which would constrain or prevent development. Consultation with the infrastructure providers including Western Power Distribution and National Grid is on-going to determine the infrastructure needed to support development.
There are no public rights of way within the area in order to ensure permeability of the site.	Noted Policy wording needs to reflect the creation of permeable routes through the site where there are no existing sites. <b>ACTION: Amend policy third paragraph to reflect site 1 being able to make full use of existing walking and cycle routes, but that site 2 needs to create these routes.</b>

KEY ISSUE: Flood risk

**Sub Issues**

**Officer response**

Welcome the attention that has been given to flood risk – one of our [National Trust] on-going concerns is the risk of flooding to the however; reference to areas downstream of the sites can also be

<p>historic property at Coughton Court. This could be affected by development upstream at Redditch and we would therefore look for the SuDS to address impacts on the wider catchment as well as the watercourses most closely related to the sites.</p>	<p>included.</p> <p><b>ACTION – amend policy criterion v “surface water runoff must be managed to prevent flooding on and, around and downstream of the sites through the use of SUDS.”</b></p>
<p>Lies within Flood Zone 1 based on our ‘indicative’ Flood Zone Map. However, the watercourse within the site is very small/minor and its floodplain is not mapped because its catchment area is less than 3km<sup>2</sup>. Given the size of the site and the small catchment size of the watercourse, the majority of the site would be located within Flood Zone 1, where development is appropriate (in considering fluvial flood risk).</p>	<p>Noted.</p>
<p>Given the topography of Site 2 and the close proximity to the River Arrow, policy should address issue of mitigating flood risk that might result along the River Arrow Valley running south-east</p> <p>Flooding along Windsor Road</p>	<p>It is not considered that the River Arrow is within close proximity to Site 2. However, a site specific flood risk assessment will be required with any development proposal which will identify any necessary mitigation measures.</p>

KEY ISSUE: Landscape

<p><b>Sub Issues</b></p>	
<p>Area 6 looks inwards to Redditch as opposed to looking out towards the Malvern’s and the Cotswold’s</p> <p>Expansion of Site 2 towards the north is possible and if controlled will minimise landscape impact</p>	<p><b>Officer response</b></p> <p>This is not a valid reason to constrain development.</p> <p>A large part of area 6 is within Redditch Borough boundary and parts are already subject to approved planning permission for both housing and employment. It is considered that site 2 would integrate well with these existing proposals as well as the existing urban form of Redditch (HGDS, Para 6.3.82).</p> <p>It is also considered that site 1 would integrate with the existing urban form at Webbeath (HGDS, Para 6.1.89).</p> <p>The preferred option of sites 1 and 2 will provide land for Redditch’s housing needs to 2030. It is not considered necessary to propose more development. The HGDS has analysed possible Green Belt boundaries for the longer term and has identified Weights Lane to the north of Site 2, as a strong defensible boundary. It is not appropriate</p>

	<p>to expand growth beyond this boundary.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
<p>New houses should not be built on the hillside above the railway line facing Bordesley. This will be an eyesore for residents in Bordesley and those travelling on the A441 into Redditch. Houses being built on this land will not be in keeping with the green belt or the landscape of the area and it will look ridiculous to have houses on the hillside just up from the railway.</p> <p>Area 2 needs to be adjusted to show that land on the hillside next to the railway remains green belt land and that area 2 begins the other side of the hill which will be more in keeping with the development at Brockhill East and keep a more distinct and clear green belt boundary. This dividing green belt boundary is crucial and building houses by the railway line on the hillside cannot be allowed as it is not in keeping with the landscape or Weights Lane industrial development which it will border.</p> <p>To the north the landscape is steeply rising to Butlers Hill and noticeably changes to a more secluded and intimate small-scale rural character. Development at this higher level would break the skyline and be visually intrusive. It should be kept well back from Brockhill Lane with a buffer to protect the character of the lane and of Hewell Grange and the higher land at Butlers Hill should be excluded entirely.</p>	<p>Paragraph 6.3.85 of the HGDS acknowledges this site constraint of the varying topography within Site 2. It is considered that “appropriate design could reduce this negative impact, particularly regarding long term views”.</p> <p>In addition site 2 could contain housing development by virtue of the ridgeline and high points at the western boundary of the site which will assist in safeguarding the countryside from encroachment.</p>
<p>Housing would reach the ridge just east of Brockhill Farm but would not intrude into open countryside from this direction</p> <p>There would be an impact on the tranquility of the setting of the Hewell Grange Registered landscape, but partly mitigated by the presence of Brockhill Wood</p>	<p>Site 2 western boundary is at the ridgeline. The HGDS does not propose to develop beyond this to Brockhill Farm.</p> <p>It is not considered that Site 2 will impact the setting of Hewell Grange Registered Landscape. By virtue of the eastern boundary being a ridgeline and the location of Brockhill Wood, impact beyond to the conservation area and Registered Landscape is considered negligible.</p>

<p>Located on a prominent ridgeline of Butler's Hill, constrained by large woodland blocks and diverse landform. Due to its attractive qualities and frequency of landscape features, considered moderate/high overall sensitivity and low capacity.</p>	<p>It is considered that "appropriate design could reduce this negative impact, particularly regarding long term views" (para 6.3.85 of HGDS).</p>
<p>Support Site 2. It is important though that the view of the new development is shielded by some appropriate tree planting, to still maintain the longer range views of the countryside</p>	<p>Noted.</p>
<p>Welcome proposals for inclusion of green infrastructure and the steps taken so far to identify existing landscape and nature conservation interests and sensitivities</p>	<p>Noted.</p>
<p>This site has significant tree and hedgerow interest as well as the Red Ditch watercourse and adjacent LWS woodland. Whilst we do not wish to object to the reduced proposed allocation illustrated in figure 15 we do consider that retention and enhancement of this important GI resource will need careful consideration in any final allocation here. We therefore support the commentary regarding opportunities to integrate these features into a robust GI package for this area and we welcome the weight this is given in the Housing Growth Policy.</p>	<p>Support to retain and enhance Green Infrastructure noted.</p>
<p>Both the 2009 RPS/FPCR Study and the Councils' own January 2013 Development Study supported development. 2009 Study appraised a slightly differently area to site 2. However, general appraisal noted it was well contained in landscape terms so that encroachment would be minimised.</p>	<p>Noted. There is a difference between Area 6 and site 2 because site 2 was formed to reflect the outcome of analysing the most defensible green belt boundaries and to form a developable area.</p>
<p>January 2013 Development Study found that of five 'weaknesses', two are common to all sites (loss of agricultural land and Green Belt). Other weaknesses (topography, high landscape sensitivity and loss of wooded estatelands) are manageable in that they do not constrain the whole area and development can be accommodated with sensitive urban design including establishment of ridgeline woodland planting characteristic of the area</p>	<p>Noted as per Paragraph 6.3.85 of the HGDS "appropriate design could reduce this negative impact, particularly regarding long term views".</p>
<p>Existing development is not sympathetic with the topography of the local area</p>	<p>Noted.</p>



KEY ISSUE: Green Belt

<b>Sub Issues</b>	<b>Officer response</b>
<p>Issue with the strength of the Green Belt boundary west of Site 2.</p>	<p>The majority of the western boundary between Brockhill and Weights Lane is considered strong (HGDS, Page 229). This is due to the mature woodland and mature tree lined hedgerow. The relatively small boundary at 15 could connect easily with the mature woodland. In addition to this the land rises due west to form a ridge which would contain the area.</p>
<p>Identify safeguarded land at 'Brockhill North' with Weights Lane and Butlers Hill Wood as southern Green Belt boundary and Cladshill Wood as eastern Green Belt boundary and the western edge of the ADR.</p>	<p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
<p>Well shielded from adjoining countryside by ridges of hills, so will have little impact on the Green Belt</p>	<p>Agreed – it is considered Area 2 is well contained and will assist in safeguarding the countryside from encroachment (NPPF paragraph 80).</p>
<p>Strip of land between Brockhill Lane and Brockhill Wood is suitable to be released from the Green Belt if land opposite is</p>	<p>The furthest land parcel to the west which lies below Brockhill Lane is beyond Area 6 and was dismissed in the HGDS under Area 5 analysis. Para 6.2.70 "At the northern extremity of the area, in the vicinity of Brockhill Farm, the land parcels north of Brockhill Wood appear remote from the remainder of the area. The wood provides a strong boundary and development beyond this would encroach into the countryside". The other land parcel, not part of Brockhill Wood but south of Brockhill Lane (Greensleeves) would not be considered a good defensible alternative Green Belt boundary because Brockhill</p>

<p>The north-western boundary selected in the HG document approximates to a ridge. The boundaries adopted are those of fields. By taking the ridge itself to be the boundary, slightly more land could be released. It may be unsatisfactory for the Green Belt boundary to cut across fields. If the present suggested boundary is not an ownership boundary, there's no great difficulty will arise from this change. Even if ownerships are different, the sale of additional land could easily resolve any difficulty. The value of development land is so high that ownership differences ought not to be allowed to affect the outcome of a Green Belt review.</p> <p>There is another possible robust boundary further from the town, in the form of the two pools in the valley west of the ridge. The adoption of these as a boundary is unattractive, as it would take the extent of the town over the top of the ridge and into the next valley. If the pools were the boundary, the logical northern boundary might be Butler's Hill Wood, rather than continuation of Weights Lane. Would regard this extension, west of the ridge, as a reserve option, to be used if insufficient land not found elsewhere.</p>	<p>Lane for a its entire length alongside the proposed growth area, is a very strong potential boundary. Development in this location would also be remote from Site 2 due to its disconnection by Brockhill Lane.</p> <p>The north western boundary (boundary 10 in the HGDS) is a field boundary which is defensible, but also an appropriate place for the developable area to end in terms of topography. Both of these features lend themselves to the site 2 boundary being defined as proposed.</p>
<p>Borough boundary uneven and Weights Lane provides a clear, strong and defensible boundary.</p> <p>Area 2 would be an extension to a current housing development and adjacent to an Industrial Park, but is still Green Belt with difficult access</p>	<p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development. The HGDS has analysed possible Green Belt boundaries for the longer term and has identified Weights Lane to the north of Site 2, as a strong defensible boundary. It is not appropriate to expand growth beyond this boundary. Para 6.3.61 of the HGDS states "development past this ridge would lead to encroachment of the countryside as this area appears remote from the remainder of the area. The ridge (156 meters) would visually contain any development further east in the area".</p> <p>Noted the HGDS consider this.</p>
	<p>All of the twenty sites analysed were either Green Belt land or areas of open space within Redditch. Access to the sites would form part of the development proposals and are feasible for all development sites in the focussed appraisal.</p>

KEY ISSUE: Open Space

**Sub Issues**

**Officer response**

From the previous Persimmon build in Brockhill only one piece of

The long-running adoption issues at Brockhill are acknowledged as

<p>Brockhill Open Space has been adopted only in January 2013. This is 10+ years after development completed. This isn't a good advertisement in looking after the wellbeing of locals.</p>	<p>unfortunate and largely unacceptable. However, whilst this is essentially a legal matter, Planning officers will aim to be more proactive with respect to future developments, in any location to ensure this situation is not repeated.</p>
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KEY ISSUE: Transport – Public Transport

<b>Sub Issues</b>	
<p>There is potential for pedestrian access to Alvechurch Station from Area 6</p>	<p><b>Officer response</b> Alvechurch Station is too far away from Area 6 for there to be a walking route created that would be within reasonable walking distance.</p>
<p>The southern and eastern sections of Area 6 are in close proximity to bus services. There are no bus stops on Weights Lane or Brockhill Lane. There are bus stops towards Salters Lane and Batchley Road (1.2km). The need to travel would be reduced if more local facilities/services provided development</p>	<p>The Policy states that “significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both site 1 and site 2 which make full use of new and existing walking and cycling routes...”</p>
<p>Accessibility to services and facilities are considered good with access to some possible by sustainable modes. Some facilities within walking distance and for access to facilities further afield public transport may be possible.  Close to public transport infrastructure</p>	<p>Noted, this has been taken into account in the HGDS.</p>

KEY ISSUE: Transport – Road Infrastructure

<b>Sub Issues</b>	
<p>Windsor Rd is a bottleneck with the bridge for Birmingham area traffic, A441 north of Sainsbury's is a bottleneck</p>	<p><b>Officer response</b> The Bromsgrove and Redditch Transport Network Assessment and Mitigation Reports (TNAMR) have identified locations where forecast traffic growth will result in junctions being at or over capacity, and identified schemes to mitigate the impact. It is expected that, in the event of the planned developments progressing to Planning Application stage, the promoters will develop detailed proposals for highway schemes which mitigate the adverse impacts of generated traffic. These mitigation measures will be considered by the Highway Authority within the more detailed Development Control process at</p>

	<p>both the pre-application and planning application stage as part of their assessment of the proposed development.</p>
<p>Site 2 bounded by a single track lane, any traffic emerging from Site 1 would cause congestion on this and other lanes as people try to find 'rat runs' to avoid the traffic congestion, leading to more accidents</p>	<p>Lanes are used (in part) as "shortcuts" because of delays on the Primary Road Network (PRN). In considering the performance of strategic transport infrastructure (including the PRN) with the type, scale and location of development set out in the Bromsgrove District and Redditch Borough Plans, it has been highlighted that significant investment will be required in the PRN. It is clear that improvements to PRN infrastructure will be required to ensure that future delays on the PRN are kept to a minimum and that the PRN represents the most attractive route for drivers. It is recognised that these improvements will have to be supported by development Masterplans and associated transport infrastructure and services mitigation measures which are designed to actively discourage use of country lanes. These mitigation measures will be considered by the Highway Authority within the more detailed Development Control process at both the pre-application and planning application stage as part of their assessment of the proposed development.</p>
<p>Development here likely to disperse movement on the local and strategic highway networks more evenly than other locations, with trips being made both eastwards and westwards but with potential heavy flows on Brockhill Drive.</p>	<p>The Redditch Transport Network Assessment and Mitigation Report (TNAMR) has identified Brockhill Drive as being a location where mitigation measures will be required.</p>
<p>Area 6 allows easy access to Redditch town centre via existing roads</p>	<p>Noted, this was taken into account in the HGDS</p>
<p>Area 6 has the potential to facilitate pedestrian trips to Redditch Town Centre, however investment in infrastructure will be required to maximise trips.</p>	<p>The Policy states that <i>"significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both site 1 and site 2 which make full use of new and existing walking and cycling routes..."</i></p>
<p>Far fewer roads will have to be built and more importantly maintained</p>	<p>The Redditch Transport Network Assessment and Mitigation Report (TNAMR) has identified Brockhill Drive as being a location where mitigation measures will be required.</p>
<p>Speeding vehicles are already a problem along Brockhill Drive</p>	<p>The Redditch Transport Network Assessment and Mitigation Report (TNAMR) has identified Brockhill Drive as being a location where mitigation measures will be required due to the forecast increases in volumes of traffic. This would include provision of the necessary</p>

	<p>highway, public transport, walk and cycle infrastructure measures designed to mitigate adverse impacts. This will include as required improved crossing facilities for pedestrians and measures to discourage speeding.</p> <p>These mitigation measures will be considered by the Highway Authority within the more detailed Development Control process at both the pre-application and planning application stage as part of their assessment of the proposed development.</p> <p>This roundabout was designed to be at-grade to enable development to the Brockhill ADR site</p>
<p>Roundabout at Hewell Road/ Brockhill Drive is dangerous</p>	

KEY ISSUE: Education

<p><b>Sub Issues</b></p> <p>Discussions are taking place with Persimmon Homes regarding education provision for their development in the area around Lowans Hill Farm. It is intended that a new school site will be provided and that there will be sufficient space to allow the school to expand to meet the needs of children living in the new housing in both Redditch and Bromsgrove. The County Council is not of the opinion that additional middle or high schools are required. However we will be expecting these developments to make appropriate contributions towards extending provision at existing schools as necessary to meet any increased demand.</p>	<p><b>Officer response</b></p> <p>Noted, this is taken into account in the HGDS.</p>
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**Brockhill West (Area 5) - Support for exclusion of Area 5**

KEY ISSUE: Support for exclusion of Area 5 - General

<b>Sub Issues</b>	<b>Officer response</b>
<p>Object to any development of Area 5 up to 2030. This area should be positively and clearly identified and named as being excluded with clear justification and explanation of the reasons why.</p>	<p>Noted. The proposed policy states that sites 1 and 2 will meet the housing requirements in Redditch up to 2030. The HGDS considers area 5 and the overall conclusions in chapter 10 do not recommend area 5 for development before 2030.</p>
<p>Support the exclusion of Area 5 (Brockhill West) from development in order to protect the area behind Dairy Lane referred to as Batchley Brook Valley (within Area 5).</p>	<p>Noted. Constraints within area 5 have been noted within the HGDS. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations.</p>
<p>Many 'Persimmon Assets' (such as under-passes) in Brockhill still unadopted after 13+ years.</p>	<p>The long-running adoption issues at Brockhill are acknowledged as unfortunate and largely unacceptable. This is essentially a legal matter and has no material impact on the consideration of future development proposals submitted for consideration and will be addressed as part of the existing legal agreements.</p>
<p>The public consultation document clearly states that this area is considered as unsuitable for developing as part of the plan. We believe that considering the information and decisions expressed for this area, it should not be re-introduced after the public consultation under any circumstances otherwise the whole process could be described as being misleading.</p>	<p>The HGDS clearly states that sites 1 and 2 will meet the housing requirements in Redditch up to 2030 but there is no suggestion in the report that Area 5 is unsuitable for development, just that it is not the most appropriate location because of surrounding historic built environment and setting of heritage assets.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly</p>

	<p>how this process will occur at the moment as the process for preparing plans can change and national government may have changed their plans for meeting the housing shortfall across the country.</p>
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KEY ISSUE: Support for inclusion of Area 5 - General

<b>Sub Issues</b>	<b>Officer response</b>
<p>Bromsgrove District Local Plan should emphasise suitability of land at Brockhill West to provide a comprehensive cross-boundary urban extension to contribute deliverable development to meeting the strategic housing requirement</p>	<p>It is not considered appropriate to suggest land at Brockhill West is suitable for development. It was made clear that “a large proportion of this area [5] may not be appropriate for development due to the surrounding historic built environment and setting of heritage assets.” (HGDS, Para 6.2.101).</p>
<p>Identified acceptance in evidence that Brockhill West is a sustainable and logical location for extension to the urban area</p>	<p>Comment noted. Area 5 was considered as a potential location for Redditch Housing Growth. However after detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>In place of 2,800 dwellings at Foxlydiate and no development at Brockhill West, allocate 1,550 dwellings in the eastern central part of Foxlydiate adjacent to the A448 and 1,200 dwellings at Brockhill West. 250 within Redditch and approximately 950 in Bromsgrove to which accesses exist on the western edge of the existing Brockhill development.</p>	<p>The suggestion made is not considered a suitable option for an urban extension to Redditch, following the HGDS and the conclusions to area 5. Paragraph 6.2.110 states “It is considered that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park, raises substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch Borough.”</p>
<p>Eastern central part of Site 1 has some merit; this applies only in conjunction with parallel proposals at Brockhill West where suitable connectivity can be created.</p>	<p>It is considered that sites 1 and 2 have more merit in meeting Redditch’s housing needs to 2030 that all of the 20 sites examined, as they are considered to be the most sustainable and have the fewest constraints in terms of environmental or historic designations.</p>
<p>At its greatest extent, the site could accommodate 1560 dwellings – a significant contribution to the sustainable housing target and, as such, it would merit further study.</p>	<p>The suggested capacity of the site is noted. As already mentioned the significant historic constraints of area 5 make it an unviable option for Redditch housing growth.</p>

KEY ISSUE: Infrastructure

<p><b>Sub Issues</b></p> <p>There is no infrastructure supporting the existing estate. There is no post office and only limited shopping.</p> <p>There is already a shortage of schools in the area and all doctors are some distance away.</p>	<p><b>Officer response</b></p> <p>Noted. The supporting infrastructure and nearest facilities were considered in relation to all of the focused areas of study, this included a consideration of the nearest facilities to area 5, see paragraphs 6.2.22-6.2.33 of the HGDS.</p> <p>Any future development of the scale proposed is likely to include additional facilities; however the preferred option of both Councils, to develop Sites 1 and 2, is considered to be the most sustainable location for Redditch housing growth.</p>
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KEY ISSUE: Transport

<p><b>Sub Issues</b></p> <p>This development will not benefit the people and businesses of Redditch. It is more likely to attract commuters for Birmingham and elsewhere due to its access to the M5.</p> <p>Rail access to destinations for employment outside of Redditch</p>	<p><b>Officer response</b></p> <p>Area 5 is not being proposed for development. It is considered that sites 1 and 2 are the most sustainable locations for development and the locations selected are not likely to make a significant difference to where the commuters will be attracted to</p> <p>There are a wide range of other considerations that suggest the preferred option would cause least harm to the Green Belt and has fewer constraints in terms of environmental and historic designations.</p> <p>It is considered that access to rail services is favourable to any development site as it increases the transport modes available and the overall sustainability of a site. Good rail access to Redditch is vital to improving accessibility and could equally result in attracting employment uses to Redditch.</p>
<p>The increased traffic flow onto the Bromsgrove Highway will cause problems at peak times</p>	<p>Worcestershire County Council (WCC) have completed transport assessments which recommend the highway improvements that are needed to support the two sites for development (with an understanding that all of the proposed development sites within Redditch and within Bromsgrove also come forward during the plan periods).</p>



	<p>There is a need for highway improvements to support the two proposed cross boundary sites if they are to be developed sustainably. An example of a highway improvement that has been identified by WCC is an additional approach lane on Brockhill Drive to Bromsgrove Highway/ Brockhill Drive. There are other highway improvements needed, they are all detailed in the supporting evidence base.</p> <p>Highway improvements will be predominately paid for by the developers.</p>
<p>The increased traffic will cause a great deal of environmental damage to the area.</p>	<p>Area 5 specifically is not being developed. A sustainability appraisal was carried out to assess the most suitable locations for development. Air quality is monitored throughout the District and no AQMA's are located within the immediate vicinity of the area. Further studies would be required to assess the impact development would have. In addition to this the sites chosen have very few constraints in terms of environmental designations.</p>

**KEY ISSUE: Ecology/Biodiversity**

<p><b>Sub Issues</b></p> <p>Lack of recorded evidence for protected species area may mean that future survey findings will alter or reduce the overall developable area or lead to requirements for particular mitigation or enhancement</p>	<p><b>Officer response</b></p> <p>There is no detailed Habitats and Species Survey. All sites have ecology issues which would need to be mitigated against.</p> <p>The Policy proposed requires any development to "protect existing biodiversity habitats and landscape geodiversity."</p>
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**KEY ISSUE: Flood Risk**

<p><b>Sub Issues</b></p> <p>Area 5 is mainly underlain by Mercia Mudstone Secondary Aquifer with a small part of the site within SPZ 3 for Severn Trent Water Ltd. public water supply boreholes. There is Flood Zone 2 and 3 associated with the Batchley Brook (classified 'ordinary watercourse')</p>	<p><b>Officer response</b></p> <p>The extent of the flood risk would not be known until detailed Flood Risk Assessments are completed for any site. These constraints have been considered within the HGDS.</p>
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<p>plus a number of smaller tributaries. Flood modelling would be required to define the developable area. Development should be located within Flood Zone 1 with sufficient protection given to the watercourse corridor and Hewell Park Lake Site of Special Scientific Interest (SSSI).</p>	<p>The proposed sites 1 and 2 mean that development within area 5 is not required as it is considered that the preferred sites present the most sustainable options.</p>
<p>Issues pertaining to Batchley Brook is significant constraint to delivering large scale development</p>	<p>This constraint has been noted in Paragraph 6.2.36 of the HGDS. "Batchley Brook is one of the watercourses identified in the Level 1 SFRA that is most vulnerable to exceeding its flow capacity to an extent that properties have been affected."</p>
<p>If Area 5 is selected all the run-off water will be collected in attenuation ponds/SUD's at the base of the development. The flow of water being fed into Batchley Brook therefore considerably increased making developing on the opposite side of the Brook from the attenuation ponds/SUD's more problematic</p>	<p>Development is not proposed within area 5. The issue of flood risk has been considered for area 5 (see section 6.2.34 of the HGDS).</p> <p>The use of SuDS as a means of managing surface water runoff had been identified as a policy requirement in order to prevent flooding in and around the proposed sites.</p>
<p>The whole area prone to severe flooding. To the rear of [1-19] Dairy Lane, has suffered continuously, resulting in:</p> <ul style="list-style-type: none"> <li>• Flooded underpasses requiring residents to cross a main road with no pavements or safe crossing (Brockhill Drive) to access shops, schools and buses etc.</li> <li>• The culvert under Brockhill Drive being unable to service the flow of water at peak floods and therefore back floods into the Open Space and underpass. This fierce fast flowing brook when in flood is a serious danger, especially to small children.</li> <li>• The attenuation ponds/SUD's in Brockhill Park are ineffective as there is still serious flooding. There has even been a registered flooding incident in Dairy Lane, so we may not be immune from future flooding if development here goes ahead.</li> </ul> <p>Mathematical models reflect what should happen; local evidence reflects what does happen. We can find no information that explains fully and clearly how creating 'balancing ponds', 'attenuation ponds' or 'sustainable drainage solutions' for Batchley Brook will in anyway alleviate this issue of flooding.</p>	<p>General constraints of flooding in relation to area 5 noted and as a general point have been considered as an area constraint in the HGDS (section 6.2.34).</p> <p>Area 5 is not proposed for development. The extent of the flood risk in the proposed sites would not be known until detailed Flood Risk Assessments are completed for any site. Adequate reference to SuDS is made within the policy; additional detail would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p> <p>The proposed sites 1 and 2 mean that development within area 5 is not required as it is considered that the preferred sites present the most sustainable options.</p>
<p>If Area 5 is reconsidered for development land to the rear of 1-21 Dairy Lane (stretching to the Conservation Area boundary) should</p>	<p>At present it is not proposed to develop on Area 5 and the sites chosen provide the housing Redditch requires up to 2030. Any</p>

<p>be excluded. This area is the natural flood plain for Batchley Brook and as such – floods (within Flood Zones 2, 3a and 3b). Building so close to the Brook and its flood plain is very unwise. It will lead to future flooding. Not looking for whole of Area 5 to be excluded.</p>	<p>constraints to development including that from flood risk should be taken into account in future considerations.</p> <p>It should also be noted that Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
<p>The floodplain of Batchley Brook is clearly unsuitable for development, but might provide useful Public Open Space.</p>	<p>Noted. Area 5 is not proposed for development within the HGDS. It is important to provide open space in conjunction with the level of housing proposed. The proposed policy requires development sites 1 and 2 to “include public open space creating a permeable layout with well-defined streets.” (HGDS, Page 226).</p>

**KEY ISSUE:** Landscape

<b>Officer response</b>	
<p><b>Sub Issues</b></p> <p>Comprises discrete rolling topography and parkland character. Physically constrained by topography and frequent landscape features. Hewell Grange estate immediately to the north (Registered Park and Garden and Conservation Area), and Brockhill Wood to the east create a diversity and strength of character. Landscape quality and sensitivity is considered moderate, although there are limited views in and out of the area compared to more exposed locations.</p> <p>Significant constraints to delivering large scale development. Whilst some opportunities may exist on reduced area illustrated in Fig. 10 the development footprint would be significantly reduced by the need to retain a significant green link between Foxlydiat and Pitcheroak Woods and the wider countryside to the west. Accordingly agree with conclusions drawn in paras 6.2.108 – 6.2.112.</p>	<p>Comments noted. The HGDS considers landscape issues within HGDS paragraphs 6.2.6 and 6.2.8.</p>
	<p>Constraints for area 5 have been highlighted by the HGDS.</p> <p>The woods mentioned are shown on figure 9 page 96 of the HGDS. Green links are important and are acknowledged by the policy requirement that “The sites will have and overall Strategy and Management Plan for Green Infrastructure which maximises</p>

	opportunity for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity.”
The landscape of this part of Area 5 is classed as being of high sensitivity	This is noted within HGDS paragraph 6.2.8 which refers to the Landscape Sensitivity Map within the wider evidence base.

KEY ISSUE: Heritage issues, Registered Park and Garden, Conservation Area

<b>Officer response</b>	
<b>Sub Issues</b>	As part of the Hewell Grange Estate – Setting of Heritage Assets Assessment (HGEHAA), the impact of the proposed development of Area 5 was assessed using the Methodology ‘Setting of Heritage Assets’. The conclusion reached was that development within this area would cause substantial harm to the setting of the Hewell Grange Heritage Assets (HAs), including the Conservation Area (CA) and the Registered Park & Garden (RPG).
Development of Area 5 would not adversely affect the setting of Hewell Grange.	Having assessed the impact of the development on Area 5, on the setting of the HAs adjacent to the Area, the conclusion has been reached, and detailed in the HGEHAA, that substantial harm would be caused to the setting of these assets
Development can be designed/implemented maintaining an appropriate relationship with adjacent heritage assets.	Notwithstanding any masterplanning work the HGDS (Paragraph 6.2.110) considers “that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park, raises substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch Borough.”
In the context of masterplanning work no impact on the character, appearance, significance or immediate setting of the conservation area has been identified	The HGEHAA details the impact development on Area 5 would have on the character, appearance, significance and immediate setting of not only the CA but also other HAs, notably the RPG.
There would be a change to the rural landscape to the east of the conservation area, affecting the approach and wider setting. However impact to the wider setting would have relatively low significance considering the wider unaltered landscape to other compass points.	It is agreed that the development of Area 5 would impact on the setting of the CA to the east. The HGEHAA has only considered the impact on the setting to the east of the CA and other HAs, and not the wider setting.
Only reason why site/location not selected relates to impact on significant historic assets at Hewell Grange	Impact on significant historic assets was a key reason taken into account however the conclusions to Area 5 identify additional constraints that “development would need to overcome... including the

<p>A landscape assessment (by FPCR) concluded that impacts can be mitigated, recognising a need for revisions particularly the elevated land adjacent to Hewell Lane where a wider woodland belt should be located, the area around the Tack Farm buildings where further consideration is merited in respect of the locally visible high spot, and in respect of the siting of the proposed school, currently shown as occupying a very large site, whereby there would remain a greater distance between the school grounds and the edge of the Conservation Area at the Papermill Cottages.</p>	<p>SSSI, the Special Wildlife Site and the flood risk/ historic flooding areas associated with Batchley Brook.” (HGDS, paragraph 6.2.109).</p> <p>The FPCR considered landscape issues, and does not appear to have examined the setting of the HAs, which was considered in the HGEHAA. The conclusion of the HGEHAA was that development on Area 5 would cause substantial harm to the setting of the neighbouring HAs, the mitigation suggested in the FPCR Assessment would not reduce this harm.</p>
<p>The need for the urban extension to meet sustainable social and economic development objectives outweighs the minor impact of the proposals on the historic assets</p>	<p>The preferred option addresses Redditch’s Housing needs whilst avoiding impact on historic assets, thus it is considered a more advantageous outcome. It is considered that development within Area 5 could have much more than a minor impact and as such raises “substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch” (HGDS, paragraph 6.2.110).</p>
<p>Proposals are in accordance with policy in NPPF and would only present 'less than substantial' harm on the conservation area with no harm on the Registered Park &amp; Garden, with considerable public benefit. Suitable buffer areas can be provided and greater public appreciation of the heritage assets achieved through enhanced access by paths through the green infrastructures of Brockhill (existing) and Brockhill West (proposed).</p>	<p>The conclusion of the HGEHAA was that substantial harm would be caused to the setting of the HAs adjacent to Site, including the Grade II* RPG, and the NPPF states that substantial harm to such assets is wholly unacceptable.</p> <p>Proposals which harm the historic environment are not in in accordance in with the NPPF, as detailed in the HGEHAA. Section 4.9 of the HGEHAA states “The Area (Area 5) currently contributes to the significance of the HAs in forming part of the rural setting of the HAs. It is the buffer between them and the outskirts of Redditch. Screening new development with trees and hedgerow will not mitigate the fact that the buffer between the HAs and the outskirts of Redditch will be foreshortened resulting in the loss of the setting of the HAs, and therefore detracting from their significance.”</p> <p>There is no indication that development of this site will give greater access to the HAs than there currently is via the Public Right Of Way.</p>
<p>Not visible from most of this site and surrounded by woodland.</p>	<p>The CA, the Planted Hill, Southern Parkland, and some non-designated HAs are all visible from various parts of Area 5, which comprises the setting of these assets. Development on Area 5 would</p>

<p>On the 'Councils evidence base' the assessment has continually failed to provide an objective or accurate assessment of these settings [of the heritage assets] and of the significance and degree of harm afforded to the heritage assets. Omitted important policy requirements and ignored important sections of national guidance, giving undue weight to historic policies. Fails to present an objective, accurate, balanced or proportionate assessment. Councils' assessment is unsound for determining suitability of sites. Evidence base challengeable in respect of landscape considerations.</p> <p>The lack of objection by English Heritage to the Brockhill West proposal in the Redditch Borough Revised Draft Preferred Strategy in 2011, since when there has been no significant change in designations to justify a change of position on the acceptability of development, leads to conclude that there is no basis for an objection.</p> <p>Council cite paragraphs from NPPF to explain assessing harm to heritage assets. Council concentrate on paragraphs which result in a conclusion of substantial harm rather than presenting a neutral approach to policy. In particular paragraphs 132, 133 and 135 of the NPPF, whilst para 134, where potential for assessing less-than-substantial harm is omitted. Indicates that prior to assessment the local authority assume substantial harm</p> <p>In quoting Local Plan policy it has been given weight equal to its standing pre-NPPF, rather than indicating that, as there is a degree of conflict within the policies and the NPPF, that they should be given reduced weight. Fails to indicate the degree of weight afforded to the draft conservation area appraisal (Bromsgrove District Council, 2010).</p> <p>Part of site 5 nearer to the Grange could be excluded. The location of any housing development should provide this choice.</p>	<p>therefore cause substantial harm to these HAs.</p> <p>The Council has carried out an objective assessment of the significance of the settings of the HAs by following the methodology outlined in the EH Document 'Setting of Heritage Assets'. All policies relevant to the Historic Environment were considered. The HGEHAA came to the conclusion that the development of Area 5 would cause substantial harm to the setting of adjacent HAs. In providing a summary of policy, only those relevant were included.</p> <p>English Heritage have supported the conclusions of the HGHA. In their consultation response dated 15<sup>th</sup> May 2013, they have stated "With regard to Site 5 English Heritage agrees with the findings of the detailed Assessment and the decision not to take the site forward, because of the potentially damaging implications for the significance of the Hewell Grange Registered Park and Garden (Grade II*) and Hewell Grange conservation area."</p> <p>All policies relevant to the historic environment have been considered. Following an analysis of the setting issues using the English Heritage Setting Document, the conclusion was drawn that development of this site would cause substantial harm to the adjacent HAs, and therefore in providing a policy summary, the policy was omitted as it was not considered relevant.</p> <p>Local Plan Policy is not considered to be in conflict with the NPPF in respect of the issues raised here.</p> <p>The Hewell Grange Conservation Area Appraisal and Management Plan (Hewell Grange CAAMP) is not draft and was adopted in August 2010</p> <p>It is considered that Area 5 forms part of the setting of a number of HAs, as outlined in the HGEHAA, and development within the setting would harm the significance of the HAs and therefore no development should take place within this Area. The preferred options exclude any development on Area 5.</p>
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<p>Under Experience of the Asset, the LA quotes Section 117 (PPS5) Historic Environment Planning Practice Guide. However, it omits final part of sentence “Nevertheless, proper evaluation of the effect of change within a setting of a heritage asset will usually need to consider the implications, if any, for public appreciation of its significance.” In other words, whilst the ability to experience an asset should not rely on the public ability to experience an asset, consideration and due weight should be afforded to the importance of those views, where public access is not easily or legally gained.</p> <p>Several photographs utilise zoom lenses, giving undue and misleading visual reference to arguments. This is in direct contrast to professional guidelines on utilising photographs for such purposes, in particular those published from the Landscape Institute (April, 2013).</p> <p>Paragraph 4.4 of heritage evidence states that the boundary of the RPG is loosely screened with trees. This is incorrect as the tree cover, planted as part of successive garden redesigns is considerably more than loose screening, with woodland creating over half of the boundary, including The Planted Hill.</p> <p>In the heritage evidence, there is no assessment of the significance to be afforded to views, in relation to understanding and appreciating the RPG.</p> <p>Para 4.5 of heritage evidence is reference to the Landscape Agency Report, which describes a “rare and valuable example of Victorian modifications, enhancing rather than detracting, from an earlier landscape”. This may be true in landscape and visual terms, although the author is not qualified to respond to that, the impact of the Victorian modifications on the historic element and value of the RPG has been considerably damaged by successive landscape designers. Work undertaken during the late C19th and early C20th conflicts with much of the landscape designs created and to varying degrees carried out by the more important of the landscape designers involved in the Estate. To state that this is an enhancement of the historic designed landscape seems contradictory to the principal significance of the RPG.</p>	<p>The HGEHAA has considered the views from where public access is not easily gained and this is examined on page 14 under the heading, ‘Views from, towards, through, across and including the asset.’</p>
	<p>The photographs that have been taken with a zoomed lenses have all been clearly labelled as such. The zoomed photographs can never replace looking at the view on site</p>
	<p>This section of the HGEHAA was only looking at the Lake and Lakeside area (see Map), and the comment was in respect of the boundary between the RPG and the fields around the Batchley Brook.</p>
	<p>Would disagree paragraph 4.7 of the HGHEA describes the unaltered rural setting to the RPG to the South East, illustrated by the extensive views of the RPG and other HAs within their rural setting, and very limited views of Redditch and the housing at Brockhill.</p> <p>This is not the case, much of the Victorian work is to the west of the lake and the Brown and Repton areas, comprising the French Garden and the Planted Hill. Successive designers have impacted on their predecessors work, but the work of Brown and Repton is clearly discernible, even despite alterations carried out by the Prison Service. The work carried out post Repton is considered significant in its own right, and is highlighted in the detailed description in the Register. The later work sought to compliment the earlier garden design in some cases, eg The Water Tower is on axis with the Repton Island, in the Brown lake, and is linked by the grass terraces.</p>

<p>Paragraph 4.8 states that rural setting of the RPG and conservation area will be lost with development of sites A and B. This statement denies the fact that a considerable amount of the rural landscape, in particular to the north, east and west, will be retained unaltered, thus preserving the majority of the rural setting.</p> <p>Heritage evidence describes the significance of the conservation area but fails to give an indication of the contribution, or the degree of contribution this wider rural landscape makes to the significance of the conservation area</p> <p>Heritage evidence comments on elements which make up the physical surroundings of the heritage assets but continually fails to give any indication of the extent of the contribution these elements make on the significance of the heritage assets, as required to undertake such analysis in line with the English Heritage guidance.</p> <p>Degree of change includes construction of Estate buildings considered as non-designated heritage assets, but does not consider the degree to which these have impacted on the historic designs and ethos of the historic designs of the garden and parkland.</p> <p>Under Experiencing the Asset, the heritage evidence finds that the RPG and CA integrate into surrounding almost totally rural landscape and states that this is particularly true at the southern end.</p> <p>Considering the degree of rural landscape surrounding these assets, identifying the southern end of the site as a particularly notable area of rural landscape gives undue reduced weight to the other areas, thereby creating a false impression of the lack of importance of these areas and of a heightened importance of the southern area.</p> <p>Heritage evidence notes a variety of views to, from, across and including the heritage assets with no indication of the significance of each of these views. Fails to consider implications for public appreciation of its significance, giving equal standing and consideration to views from Public Rights of Way as to positions within the middle of a field.</p>	<p>We note the acknowledgement that the development of Area 5 (Site A) ( the report has not considered Site B) will harm the rural setting of the HAs to the south east. This report only examined the impact of the development of Area 5 on the setting to the south/south east of the HAs.</p> <p>The HGEHAA considers the impact of the development of Area 5 which comprises the setting of the HAs to the south east. The level of significance is summed up in the conclusion to Step 3 of the EH setting analysis on page 15 of the Assessment.</p> <p>See comment above</p>
<p>Degree of change includes construction of Estate buildings considered as non-designated heritage assets, but does not consider the degree to which these have impacted on the historic designs and ethos of the historic designs of the garden and parkland.</p>	<p>The estate buildings comprise a small number of buildings that one would expect to find on a country estate of this size and type. They have all been constructed on the edge of the estate in the parkland, and not within the more formal areas of the park, and have minimal impact on the park.</p>
<p>Under Experiencing the Asset, the heritage evidence finds that the RPG and CA integrate into surrounding almost totally rural landscape and states that this is particularly true at the southern end.</p> <p>Considering the degree of rural landscape surrounding these assets, identifying the southern end of the site as a particularly notable area of rural landscape gives undue reduced weight to the other areas, thereby creating a false impression of the lack of importance of these areas and of a heightened importance of the southern area.</p> <p>Heritage evidence notes a variety of views to, from, across and including the heritage assets with no indication of the significance of each of these views. Fails to consider implications for public appreciation of its significance, giving equal standing and consideration to views from Public Rights of Way as to positions within the middle of a field.</p>	<p>On page 10 of the HGEHAA it is made clear that the scope of the study is restricted to the impact of any possible development within Area 5 on the HAs.</p>
<p>Heritage evidence notes a variety of views to, from, across and including the heritage assets with no indication of the significance of each of these views. Fails to consider implications for public appreciation of its significance, giving equal standing and consideration to views from Public Rights of Way as to positions within the middle of a field.</p>	<p>The photographs illustrate the rural setting and the visibility of the HAs, including the Planted Hill from Area 5. This is stated in the first section under 'Experience of the Asset' heading'. They show the proximity of Area 5 to the HAs. It is also highlighted that at the start that Section 117 of the PPS5 Planning for the Historic Environment: Historic Environment Practice Guide, states 'the contribution that setting makes to the significance does not depend on there being public rights or an ability to access or experience that setting'.</p>



<p>Heritage evidence claims that tranquility and remoteness of heritage assets will be lost, failing to note that substantial elements of the rural surroundings to the north, east and west, will remain</p>	<p>This HGEHAA is assessing the impact of development on Area 5 on the setting of the neighbouring HAs. This part of the setting is highly visible, and it also forms the buffer between the HAs and the urban fringes of Redditch, without it the HAs will lose their setting and will become contiguous with the suburbs of Redditch.</p>
<p>In the heritage evidence, throughout Step 3 there are comments on effects of development, examining the alteration from a variety of views. Fails to consider the relative importance of such views, giving equal weight to all such views leading to a lack of objective assessment</p>	<p>Would disagree, the range of views illustrate the visibility of the estate as a whole from Area 5 and the immediate vicinity, and illustrate the rural setting.</p>
<p>Heritage evidence states that development would be prominent and very distracting but with no explanation of how this opinion has been arrived at and no evidence to support these opinions.</p>	<p>The HGEHAA states that development of Area 5 is likely to be prominent due to the topography of the site. The topography and nature of the views across the site from various vantage points is discussed earlier. It is not possible to be specific at this point in time as a planning application is not being considered only the principle of development on this site.</p>
<p>Throughout Other Effects of Any Potential Development in the heritage evidence, it notes there will be alterations to the skyline, but fails to indicate where this alteration will be seen from and the degree of significance to be afforded to such views.</p>	<p>Again, it is not possible to be specific at this point in time as a planning application is not being considered only the principle of development on this site.</p>
<p>Heritage evidence refers to introduction of lighting, and alterations to general character of Sites A and B changing the sites, but fails to give any assessment of the degree of such alteration, the significance of such alteration, and the degree of impact on heritage assets, and their significance.</p>	<p>Again, it is not possible to be specific at this point in time as a planning application is not being considered only the principle of development on this site. The document only considered the impact on Area 5.</p>
<p>Heritage evidence fails to identify/consider potential mitigation, which may minimise potential impact, or which may provide positive enhancement or opportunities to draw on the contribution made by the historic environment. This would help the document accord with paragraph 126 of the NPPF.</p>	<p>Page 21 of the assessment states 'Although the topography of The Area is undulating, having assessed the topography and sightlines in detail, to and from the southern boundary of the RPG and the CA, it is considered that any development in The Area (Area 5) would intrude into the setting of both Heritage Assets'. The HGHEA does accord with Paragraph 126 of the NPPF, notably where "they (LPAs) should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance."</p>
<p>Although Registered Park and Garden lies adjacent to site, the site plays a neutral role in creating the setting</p>	<p>The HGHEA explains in some detail why this site comprises part of the setting of the RPG and the other HAs associated with the Hewell</p>

<p>Use of natural topography with a robust landscape buffer, new woodland blocks and retention of higher ground and character and integrity of Batchley Brook Valley, prevent substantial alteration to the setting or significance of the park &amp; garden</p>	<p>Estate.</p> <p>This site currently forms a natural rural buffer between the HAs and the urban area. If developed the buffer, the wider rural setting of the HAs in this area, would be lost, and the significance of the HAs harmed. Planting of woodland blocks would only act as a screen and would have to be high enough to hide development. This would not only be a unnatural creation in the natural landscape, but would foreshorten the rural buffer, in term having a negative impact on the setting of the HAs.</p> <p>Section 4.9 of the HGEHAA states “The Area (Area 5) currently contributes to the significance of the HAs in forming part of the rural setting of the HAs. It is the buffer between them and the outskirts of Redditch. Screening new development with trees and hedgerow will not mitigate the fact that the buffer between the HAs and the outskirts of Redditch will be foreshortened resulting in the loss of the setting of the HAs, and therefore detracting from their significance.”</p>
<p>Though there will be some impact on wider rural landscape the degree to which these fields form and integral and vital element is low considering landscape to the north, east and west</p>	<p>This part of the setting is highly visible, and it also forms the buffer between the HAs and the urban fringes of Redditch, without it the HAs will lose their setting and will become contiguous with the suburbs of Redditch, as explained in Section 4.9 of the HGEHAA, noted above.</p>
<p>The historic edge of the Park itself would act as an effective boundary to the north west of the site which would be well contained to the north east by the Batchley Brook and Brockhill Wood and, to the south east, by the strong ridge utilised by the B4094 Hewell Lane.</p>	<p>As explained in the HGHEA, this site is part of the setting of the Hewell Estate. “The setting contributes to the legibility of a historically and aesthetically important country estate, which remains remarkably intact, and therefore our ability to appreciate the significance of the RPG and the CA.”</p>
<p>Would relate well to existing built-up area of Redditch at Brockhill and Batchley and would have good access to supportive infrastructure; bus services, railway station, education, retail and health. Thus there is the potential for less reliance on the motor car.</p>	<p>This is true, but the development would cause substantial harm to the setting of various HAs including the Grade II* RPG, as explained in the HGEHAA.</p>
<p>Development beyond the south east boundary of the Park would detract little more from its setting than the prison buildings and prison officers’ housing to the north west and the A448 dual carriageway to the south, which separates the Grange from its kitchen garden.</p>	<p>See comments on page 13 of the HGEHAA. These developments were noted in the report; they clearly detract from the setting of various HAs. They were constructed at a time when government departments benefitted from Crown Immunity, and the land they occupy is comparatively small compared to the development site. On</p>

<p>Those preparing the HG document have sought a landscape boundary between Batchley and Hewell Park. The officers have however ignored the most obvious landscape barrier of all, namely the edge of the park. The boundary of the registered park (as shown on figure 8, page 93 of the HG document) is very similar to the extent of the park that the author deduced from the Tithe Map for Tardebigge parish. This boundary has recently been adopted as the boundary of the Conservation Area, though this Area also incorporates two groups of buildings adjoining but outside the registered park. This accordingly represents both a long-standing and an extant boundary. This would make a robust north-western boundary for a developable area. Batchley Brook and Brockhill Wood would provide a robust northern boundary.</p> <p>The desire to protect the setting of the Conservation Area is laudable, but it is suggested that the HG document is taking this to extremes.</p> <p>The registered park to Hewell Grange, the listed buildings therein, together with the Hewell Conservation Area and the listed buildings therein - Many of these buildings and features date from our period of interest 1837-1915 and contribute significantly to the character of the historic environment on the Hewell Estate.</p> <p>Any housing development in the northern-most point of site 2 adjacent to the A448 and at the top of the hill opposite Tack Farm is likely to be visible from a number of points within the registered park and conservation area.</p> <p>Would not support development beyond the proposed site boundaries and closer to either the Hewell Conservation Area or the registered park, where such development would have a negative impact on views out of the conservation area and registered park, and could adversely affect the setting of listed buildings in those areas.</p> <p>The Hewell Grange estate lies in close proximity to the identified sites</p>	<p>their own these developments impact on the setting of the HAs, and cumulatively their impact is even greater.</p> <p>As explained in the HGEHAA, Area 5 comprises part of the setting of the Hewell Estate. "The setting contributes to the legibility of a historically and aesthetically important country estate, which remains remarkably intact, and therefore our ability to appreciate the significance of the RPG and the CA."</p> <p>The HGDS identifies strong and weak boundaries within area 5 (P228). The strong boundary along the edge of Hewell Park is acknowledged on p228 however due to the impact to the historic setting of the park it is considered inappropriate to use this boundary.</p>
<p>The registered park to Hewell Grange, the listed buildings therein, together with the Hewell Conservation Area and the listed buildings therein - Many of these buildings and features date from our period of interest 1837-1915 and contribute significantly to the character of the historic environment on the Hewell Estate.</p> <p>Any housing development in the northern-most point of site 2 adjacent to the A448 and at the top of the hill opposite Tack Farm is likely to be visible from a number of points within the registered park and conservation area.</p> <p>Would not support development beyond the proposed site boundaries and closer to either the Hewell Conservation Area or the registered park, where such development would have a negative impact on views out of the conservation area and registered park, and could adversely affect the setting of listed buildings in those areas.</p> <p>The Hewell Grange estate lies in close proximity to the identified sites</p>	<p>The CA is not the only HAs under consideration, there is also the Grade II* RPG as well as non-designated HAs on the edge of the CA. The NPPF is clear that HAs including their settings are important, and should be protected from development which harms their significance.</p> <p>Comments noted.</p>
<p>The registered park to Hewell Grange, the listed buildings therein, together with the Hewell Conservation Area and the listed buildings therein - Many of these buildings and features date from our period of interest 1837-1915 and contribute significantly to the character of the historic environment on the Hewell Estate.</p> <p>Any housing development in the northern-most point of site 2 adjacent to the A448 and at the top of the hill opposite Tack Farm is likely to be visible from a number of points within the registered park and conservation area.</p> <p>Would not support development beyond the proposed site boundaries and closer to either the Hewell Conservation Area or the registered park, where such development would have a negative impact on views out of the conservation area and registered park, and could adversely affect the setting of listed buildings in those areas.</p> <p>The Hewell Grange estate lies in close proximity to the identified sites</p>	<p>Comments noted.</p>
<p>The registered park to Hewell Grange, the listed buildings therein, together with the Hewell Conservation Area and the listed buildings therein - Many of these buildings and features date from our period of interest 1837-1915 and contribute significantly to the character of the historic environment on the Hewell Estate.</p> <p>Any housing development in the northern-most point of site 2 adjacent to the A448 and at the top of the hill opposite Tack Farm is likely to be visible from a number of points within the registered park and conservation area.</p> <p>Would not support development beyond the proposed site boundaries and closer to either the Hewell Conservation Area or the registered park, where such development would have a negative impact on views out of the conservation area and registered park, and could adversely affect the setting of listed buildings in those areas.</p> <p>The Hewell Grange estate lies in close proximity to the identified sites</p>	<p>These constraints to the site have been considered and the preferred option of sites 1 and 2 mean impact to these assets within area 5 will be avoided.</p> <p>Comment noted, however Hewell Grange is one of 6 Grade II* RPG in</p>

<p>1 and 2. As the only Grade 2* Registered park in Worcestershire it is essential that the historic landscape at Hewell is protected and maintained.</p>	<p>Worcestershire but is the only one in Bromsgrove District</p>
<p>Support the landscape appraisal and Heritage Asset assessment carried out by Bromsgrove District Council.</p>	<p>Support for the HGEHAA noted.</p>
<p>Notes with approval the conclusion that development of the land immediately to the south and south east of the Hewell Grange Registered Park and the Conservation area would cause substantial harm to the setting of the major heritage assets.</p>	<p>Support for conclusions of HGDS noted.</p>
<p>With regard to Site 5 English Heritage agrees with the findings of the detailed Assessment and the decision not to take the site forward, because of the potentially damaging implications for the significance of the Hewell Grange Registered Park and Garden (Grade II*) and Hewell Grange conservation area.</p>	<p>Support for HGEHAA noted.</p>
<p>The Hewell Grange Estate: Setting of Heritage Assets Assessment 2013 report states 'The analysis carried out in this document has demonstrated that development in The Area (Area 5) would cause substantial harm to the significance and setting of major assets. The Area (Area 5) should therefore not be allocated.'</p> <p>Development in this location would have a detrimental effect on the Hewell Grange Conservation Area and Registered Park and Gardens. This area can see and therefore can be seen from the Old Papermill Cottages and the Hewell Kennels, which are both within the boundary of the conservation area.</p> <p>Support the exclusion of Area 5 (Brockhill West) from development because of its close proximity to the Hewell Grange Conservation Area and Registered Park and Gardens.</p>	<p>Support for the HGEHAA and HGDS noted.</p>

KEY ISSUE: Green Belt

<p><b>Sub Issues</b></p>	<p><b>Officer response</b></p>
<p>There are two possible approaches to providing a barrier between the town and the Park:</p>	<p>With the policy proposing sites 1 and 2, area 5 is not proposed for development.</p>

<p>- The Green Belt boundary would be set as the boundary of the Park, with Batchley Brook and the southern boundary of Brockhill Wood, but site-specific policies would be incorporated in the Plan, providing a cordon sanitaire within which development would be prohibited.</p> <p>- The Green Belt boundary would be set along the less robust line of footpath 539C and the accommodation road from it to Tack Farm (boundary 2 – a strong boundary). Explanatory text would then explain that the robust line was the edge of the Park, but that the boundary had been set where indicated to provide a small strategic gap between the land released for eventual development and Hewell Park.</p>	<p>A key part of the 'focused area appraisal' was the assessment of the Green Belt which assessed the various NPPF purposes of the Green Belt. This involved considering the use of physical, permanent attributes on the ground. The assessment of all potential Green Belt Boundaries within area 5 have been clearly shown (HGDS, page 228). This shows strong and weak boundaries within the area. A potential developable area has been identified within the HGDS (figure 10, page 120).</p> <p>It is considered that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park raises substantial concerns as to the suitability of area 5 to take housing growth. The two possible approaches to identify potential boundaries for a development site are therefore considered unsuitable.</p>
<p>The south-eastern boundary of the developable area is of course a very strong one. Hewell Lane (B4096) runs along the summit of a ridge, a watershed between the Arrow and the Bow Brook. The Bromsgrove Highway (A448) parallels Hewell Lane. The only further consideration here may be that a policy will be needed that roofs should not project above the ridge.</p>	<p>Comments on the identified potential developable area for area 5 noted. However the HGDS concludes that area 5 is not one of the sites proposed for development.</p> <p>The issue of roofs projecting over ridges is noted. The proposed policy states that development should be "sympathetic to the surrounding rural areas of Bromsgrove" whilst "fully integrating into the existing areas of Redditch."</p>
<p>Brockhill West significantly more sustainable than Foxlydiate proposals in respect of accessibility, integration with the town, landscape impact and containment and impact on Green Belt.</p>	<p>This is considered incorrect. For example, area 5 is less sustainable than area 4 in terms of impact to the historic environment. The sustainability appraisal carried out for the housing growth areas shows how developable area 4 can be viewed more sustainable than area 5.</p>
<p>This is Green Belt land</p>	<p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p> <p>From the evidence contained in this Study it is clear that a thorough process has been undertaken to identify the best possible solution to</p>

sustainably meet the identified growth needs of Redditch. It is unfortunate that in order to do this, current Green Belt land has to be reallocated but government policy is clear on the need to find land to meet unmet housing needs<sup>1</sup>, and that Green Belts can be reviewed as part of the plan making process<sup>2</sup>. In an area with such significant Green Belt coverage (Bromsgrove District has 91% Green Belt coverage) these two principles (in Paragraph 182 and Paragraph 83 of the NPPF) lead to the inevitable conclusion that in order to meet unmet needs, release of some Green Belt land will have to be considered.

## Bordesley (Area 8) – Support for Development

KEY ISSUE: Bordesley as an alternative development location - General Comments

<b>Sub Issues</b>	<b>Officer response</b>
Area 8 Bordesley should be reconsidered as a strategic site for development.	20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.
The number of Areas allocated for future development in the Local Plan 4/Cross Boundary Growth Expansion (2030) should be kept to a minimum therefore minimizing the overall impact.	The Councils do not want to release more Green Belt land for development than is required to meet the objectively assessed housing needs.
No one Area can provide the full requirement so limit development to 2 Areas maximum. (Areas 6 & 8)	The policy proposed includes sites within Areas 4 and 6 which together meet the full requirement. Limiting the number of development areas arbitrarily would reduce the ability of the plan to provide enough land to meet housing needs.
Regeneration of area via resurrection of the North West Redditch Masterplan.	Most of the area covered by the former draft Redditch North West Master Plan area is already incorporated within the sites allocated for development within Local Plan No.4, so only limited further regeneration development is possible.
The existing building found at Bordesley to the east of this location, and on the Birmingham road to the north, indicates that the gap between Redditch and Birmingham (Alvechurch) is not going to get any smaller than it is at present, as both areas of existing development provide physical barriers to a Bordesley site.	It is presumed that this representation means to the west rather than east. The existing development that currently exists at Bordesley does not diminish the Green Belt gap between smaller settlements closer to Redditch, or the larger strategic gap to the conurbation and Birmingham. The physical barrier only therefore exists on this western edge of Area 8.
This site could easily be joined into the Redditch conurbation (Church Hill/Hithergreen Lane) and will not be a satellite settlement. Existing houses here have previously been classified as not being a settlement so no encroachment arguments apply.	There is no logical extension to the urban form of Redditch in this location and this is a key concern for this area. Any development within Area 8 would cause urban sprawl beyond the existing built up area more than any other area identified in the focussed area appraisal work, due to its lack of existing connectivity with the built form of Redditch.
Half (at least) of the proposed houses need to go into Bordesley from Foxydiat.	There is no rationale for this statement. The Housing Growth Development Study explains the rationale for the two preferred sites.
Build along the new rail track	This suggestion proposes development in Area 11 and beyond , this

	<p>was discounted for the following reasons: Local Wildlife Sites, River Arrow flood plain, impact on the Green Belt and resulting loss to the 'strategic gap' (HGDS para 6.5.78).</p> <p>This area is not proposed as a preferred site at this stage so there would be no merging of development.</p> <p>There is no evidence to back this assumption. The existence of the Dagnell End Road segregating any development opportunity from the open space in Redditch would mean that this design/layout would not be feasible</p> <p>The Housing Growth Development Study explains the rationale for the two preferred sites in relation to the Objectives. Overall the Study does not conclude that area 8 meets the Objectives perfectly.</p> <p>Bordesley has never been designated a good place to build. A Study carried out by White Young Green (WYG Second Stage Report) suggested that Bordesley would be suitable to meet housing need. However this Study's recommendations were considered by WMRSS Phase 2 examination and not considered sufficiently robust to support a designation.</p> <p>As part of the current HGDS all sites including Bordesley of the WYG areas were considered as potential areas to meet Redditch's housing need. After detailed analysis it was considered that sites 1 and 2 were the most suitable.</p> <p>There are no positive planning reasons to currently suggest merging settlements would be a reason to support development. Green Belt Policy (NPPF paragraph 80 bullet point 2) currently recommends against the merging of settlements.</p> <p>This is not a planning consideration.</p> <p>All potential development areas are contentious as Green Belt would need to be lost, and people live in close proximity to all potential development areas.</p>
<p>Development here would result in the merging with existing development at Bordesley</p> <p>Potential residents of new development would prefer their houses to back onto a golf course/ country park rather than existing houses. Therefore, providing housing immediately adjacent to current existing housing in Redditch at Webheath should not be a major decision making factor.</p> <p>All 13 plan objectives listed in your booklet would suit Area 8 perfectly</p> <p>Bordesley was designated the good place to build 3 years ago why now is it not?</p> <p>WYG2 concluded that Area 8 was the most appropriate for cross boundary development</p>	
<p>Development here would also result in the merging with existing development at West Bordesley</p> <p>Persons coming to live at Redditch will most likely have lived previously in towns or urban areas so that moving to an area like Bordesley should help them to integrate well-being urban rather than a rural area.</p> <p>Building on Area 8 would not be as contentious.</p>	



<p>It has been suggested that Area 8 could possibly cater for more houses than is required and that this detracts from the use of this area for the development. Is it possible to develop Area 8 with lower density, provide employment so that travel distance to work is reduced and create more open and amenity space for the use of residents?</p>	<p>This suggestion would use more Green Belt land than necessary to meet the current housing requirements. Both Councils will seek to make the most efficient use of land as possible. It is also not feasible that employment provision on site would meet all of the employment needs of area 8. There are also more sustainable employment options elsewhere.</p> <p>The Policy proposed requires any development site to include “public open space creating a permeable layout with well-defined streets” .</p> <p>It is unclear how development north of Redditch would improve Bromsgrove’s Town Centre.</p>
<p>Building to the north of Redditch would improve Bromsgrove’s Town centre.</p> <p>If this area were to be considered in future for development, it would be open to legal challenge because of the result of this examination in public.</p>	<p>This is not the case. This Area has been discounted as the Council’s preferred option to meet growth needs up to 2030. When it is appropriate to review the Plan, and with future development requirements post 2030 in mind, this area may need to be reviewed for its suitability to meet those future development requirements. At this point in time, longer-term growth requirements post 2030 have not been identified.</p>

**KEY ISSUE: Biodiversity**

<p><b>Sub Issues</b></p>	<p><b>Officer response</b></p>
<p>Reduced ecology issues</p>	<p>There is no detailed Habitats and Species Survey to corroborate this. All sites have ecology issues which would need to be mitigated as part of detailed proposals.</p>
<p>Note very significant issues associated with likely impacts of development, especially with respect to the Dagnell Brook and other LWSs and SSSIs.</p> <p>Dagnell End Brook is a SWS</p>	<p>The Policy proposed requires any development to “protect existing biodiversity habitats and landscape geodiversity.”</p> <p>Noted, these constraints have been considered within the HGDS.</p>
<p>Note that large scale development here would effectively enclose the northern edge of the Arrow Valley Park, severing its link to the wider</p>	<p>Agreed, these constraints have been considered within the HGDS.</p>

<p>countryside. Agree this area is inappropriate for major development. Small scale proposals would also have to address various biodiversity, landscape and flooding issues and any development here would need to have substantial GI links to maintain connectivity between the Arrow Valley and the wider countryside.</p> <p>Document states there are 2 SWS adjacent to the northern boundary. Although it is realistic to mention these, they are not inside the area, and should not be seen as constraints</p> <p>River Arrow and its tributary are special wildlife sites. They form valuable wildlife corridors, linking the watersheds which flow to the River Trent and River Avon.</p> <p>A wide diversity of bird species are often observed in and around Alvechurch. These include nesting ravens, kingfishers, buzzards and other raptors, owls, all three species of woodpecker and many others. The WMRSS Sustainability Appraisal by URSUS Consulting Ltd (page 6) states "bird species provide a good indication of the states of the wildlife in the countryside."</p> <p>The habitat of large numbers of badgers, owls, kestrels, buzzards, woodpeckers, kingfishers, crayfish, fresh water shrimps and bats would be destroyed.</p> <p>Agricultural land</p>	<p>Designations within and adjacent to potential development sites have been identified for all sites.</p>
<p>Noted.</p>	<p>Noted.</p>
<p>There are areas of ancient woodland.</p>	<p>There is no detailed Habitats and Species Survey to corroborate this. All sites have ecology issues which would need to be mitigated as part of detailed proposals.</p> <p>The Policy requires any development to "protect existing biodiversity habitats and landscape geodiversity." In any case Area 8 is not a preferred site.</p> <p>Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development.</p> <p>The area is within the Wooded Estatelands Landscape Character type, therefore it is expected that there could be parcels of ancient woodland.</p>

KEY ISSUE: Flood Risk

<p><b>Sub Issues</b></p>	<p><b>Officer response</b></p>
<p>No flooding issues</p>	<p>It is not possible for there to be no existing flood risk issues as there</p>

	are ditches and a watercourse and defined flood risk areas on the Area (Zone 2 and 3). If this site were to be the preferred option a FRA would be required
This area is dissected by the flood plain, providing the opportunity to reinforce the green linkages and integrate existing and new development.	With any watercourse that appears through a site, there are opportunities for GI enhancement and wider linkages are possible
Area 8 is located on Mercia Mudstone formation. There are four historic landfills and therefore appropriate land contamination assessments would need to be undertaken.	Noted, should there be a planning application received on site relevant land contamination assessments would be needed.
There is Flood Zone 2 and 3 associated with a tributary of the River Arrow (classified 'ordinary watercourse'). Flood modelling required to define developable area. Development should be located within Flood Zone 1 with sufficient protection to the watercourse corridor.	Noted this would be required on any potential sites.
SuDs and demarcation of land bordering the brook as a Green corridor would aid dispersal of surface and groundwater. Link to the Arrow Valley Green corridor to the south of Dagnell End Road.	This would be required in any case because the brook is a SWS which flows to the Arrow Valley. SuDS would be required for any potential development, as required by the Councils' proposed policy.
Since the Redditch and Bromsgrove Outline Water Cycle Strategy doesn't comment on potential development at Bordesley we refer to the Royal Haskoning Report which reveals that when considering the impact of 2000/3000 houses, drainage and flooding are not seen to be a problem	The Outline WCS was completed before the cross boundary locations were analysed so it would not be included.
Area 8 is clearly a flood risk as it contains a number of tributaries of the River Arrow.	The extent of the flood risk would not be known until detailed Flood Risk Assessments are completed for any site. These constraints have been considered within the HGDS. However the SFRA Level 1 states that there are 'no formal flood defence structures or reports of fluvial flooding along this [Dagnell Brook]'
Flooding at Storage Lane, Dagnell End Road/ B441	
Development will compound flooding issues at the Abbey Park golf course	
The fields are waterlogged as drainage appears to be very poor.	The drainage issues on site would not be known until detailed Flood Risk Assessments and drainage strategy are completed for any site.

KEY ISSUE: Green Belt

<b>Sub Issues</b>	<b>Officer response</b>
No obvious boundary to potential development in this location but it	Topography in this area is not considered to be strong enough to be

could be contained by topography	able to contain development, until Storage lane is reached at the northern extent of the area.
Bordesley greenbelt is of less natural importance than Bentley's	Natural importance is not a Green Belt purpose. All Green Belt purposes have been considered in the same way for each site in the Housing Growth Development Study. Development at Bordesley would have a greater impact with respect to 'strategic gap' reduction than development elsewhere.
The proposed boundary for development would maintain a strategic gap between Rowney Green, Alvechurch and Redditch.	There is no 'strategic' gap between these settlements, the strategic green belt gap is considered to be a much larger extent of land which prevents the coalescence of Redditch and Birmingham. In any case, proposed development on area 8 would reduce the gap significantly, especially to Rowney Green.
The areas (sites 1 and 2) avoid building on the strategically important area of countryside in the Parish of Alvechurch which separates Birmingham from Redditch.	Noted. See response above
Can understand the wish to avoid development in the north west of Area 8 since this is largely an open relic parkland landscape. If it were to be conserved, a benefit would be that the setting of Rowney Green would be preserved and a clear gap between Redditch and Alvechurch maintained. Thus coalescence of distinctive settlements will have been avoided.	Agreed but in relation to the whole of area 8 due to the weak boundaries across the area, these matters have been considered within the HGDS.
Defensible boundaries could be created by topography/ hedgerows/ tree-planting - this is a twenty year rollout	Existing defensible boundaries are always more preferable for defining long term green belt boundaries on a site to provide more certainty going forward. The HGDS has considered these constraints.
Would be contained by topographical features and main roads which surround three sides of it so containing the possibility of future sprawl.	The HGDS examined these boundaries and determined that there are few features that could contain a smaller development area.
Boundaries on Area 8 would need strengthening. Three boundaries comprise an A road, a B road and a wide country road interspersed with housing.	
This section is less vulnerable than the Green Belt that separates Redditch from Astwood Bank or Studley.	Neither area 8 nor the land between Redditch and Astwood Bank or Redditch and Studley has been identified as preferred options for housing growth. These areas have been discounted in the HGDS for a

	number of reasons, not least because of the coalescence of the settlements.
Boundary no. 30 on the Housing growth Development Study map is weak but only a short stretch where there is only posts and wire. Could be reinforced.	Boundary 30 is a very short section of the boundary. The existing green belt boundary. These constraints have been considered within the HGDS.
Rejection of options north of Redditch is supported on grounds of coalescence risk with Alvechurch, sprawl, encroachment into an extensive area of countryside, and development in a location more likely to lead to commuting away from Redditch to Birmingham rather than encouraging more balanced growth within Redditch. This rejection is consistent with the conclusions of the RSS Panel at paragraph 8.82 of their report.	Agreed.
The document says that there is no logical extension to the urban form of Redditch. This is an argument which could equally apply to the other areas, as they all eat in to green belt, and create odd extensions to the form of Redditch.	This is not the case. The HGDS refers to the urban form being cut off by potential development through the substantial area of the Arrow Valley Park and its links northwards. The other sites are all green belt but this is a different consideration from urban form
Document suggests that the feeling of remoteness would be increased because the area cannot be seen due to higher areas in foreground. Where exactly are these higher areas? Any undulation would likely be levelled to some extent by the developer which would mitigate this. The land rises to the North, so suggesting it would not be visible from other Redditch urban areas is a mystery.	The higher areas exist just north of the Dagnell End Road. The undulating areas start at the edge of the existing housing along Dagnell End Road and continue until after the entrance to the fishing pools. Large scale earth movements in any development are not generally encouraged, especially on such a large site.
"A distinct lack of strong defensible boundaries in the area makes it difficult to determine where any development would start to encroach in to the countryside, unless weak boundaries were strengthened considerably". This is no different to Area 4, which also has weak boundaries but wording in Area 4's appraisal doesn't suggest that this is a problem. Why should it be a concern for this site? Many of the boundaries for Area 8 are actually stronger than those for Area 4.	Area 4 boundaries have been assessed in the same way as Area 8 and the HGDS explains where boundaries are stronger in parts of Area 4.
The statement that 'therefore in Green Belt terms no development would be preferable for this area; however for consistency further work has been done on selecting the most appropriate boundaries that could be utilised' gives the impression that this factor alone has been used to make a decision against	One factor has not led to conclusions about an areas suitability. There has been extensive SA work carried out for all sites, in particular those included in the focussed site appraisal which considers a number of sustainability factors leading to the selection of sites 1 and 2.

<p>development on Area 8, and that the further comments made in the document on the site are merely for the appearances sake. No area should be discounted on one factor alone, especially when it is a factor which is poorly matched against other sites being considered.</p>	
<p>A boundary can run from the mid-point on the eastern boundary of HECZ148h to the north of the Fishing pools and across to Poplar Farm and Icknield Street. This would maintain a gap between housing and Storage Lane. However the suggested northern boundary of the area considered suitable for housing is set further to the south than this, with a consequent increase in the strategic gap.</p>	<p>The suggested boundary appears to be boundary 23 leading to boundary 4 in the HGDS Appendix 2. These boundaries have been identified as weak boundaries and are not suitable for long term green belt boundaries.</p>
<p>Development here would be a fundamental assault on the original green belt concept (reduction of the Redditch/ Birmingham Green Belt gap) and create a stand-alone housing estate wholly disconnected from the Redditch urban form (a connection which new sites for housing for Redditch should have).</p>	<p>Agree, these constraints have been considered within the HGDS.</p>
<p>Area 8 is a very important 'buffer' between Redditch and the urban conurbation of Birmingham.</p> <p>Maintain openness between Birmingham, Hopwood, Alvechurch and Redditch, if we are to respect the principle of the Green Belt and maintain the above features of our locality.</p>	<p>It is important in terms of the role it plays in keeping Redditch and the conurbation separate through its Green Belt purpose, as well as other settlements</p>
<p>The northern boundary of Area 8 (Storage Lane) is not well defined and would lead to continual pressure from developers to extend development all the way up to the M42, engulfing Alvechurch and Rowney Green</p>	<p>Area 8 has not been identified as a preferred location for development. Storage Lane is a strong enough boundary in Green Belt terms but the extent of development would be more than is required before it reaches Storage Lane. The HGDS has identified that there is a lack of strong defensible boundaries south of Storage Lane. Furthermore, development at Bordesley would have a greater impact with respect to 'strategic gap' reduction to the conurbation than development in other locations.</p>
<p>VMRSS panel report refers to this area as a "more significant gap towards Alvechurch in relation to the purposes of the West Midlands Green Belt in containing the West Midlands conurbation (pages 194/194 / paragraph 8.82)</p>	<p>Noted.</p>
<p>Either the whole area should be in the Green Belt or none of it. Officers have struggled to find any landscape barrier in this area for a</p>	<p>Agreed.</p>

<p>northern boundary to an area released. The reason is clear: there is none. The only possibilities are:</p> <ul style="list-style-type: none"> <li>- The Dagnell Brook, which is also the boundary between Beoley and Alvechurch. This runs up the eastern side of Osmerley, and thus does not offer a northern boundary.</li> <li>- The continuous boundary between Bordsley Park and the other two farms, between two HECZ areas (shown on figure 19, page 166 of the HG document) – HECZ 148h and parts of HECZ 148c. However, the release of the whole of this would take the edge of Redditch far unacceptably close to Rowney Green. It would therefore virtually remove the strategic gap between Redditch and that village.</li> </ul>	
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KEY ISSUE: Infrastructure – Education

<b>Sub Issues</b>	<b>Officer response</b>
Alvechurch and Bordesley were always historically linked to Redditch Schools in the past	This is not a planning matter which relates to the release of land for development.
Bordesley has better access to schools in both Redditch and Bromsgrove.	In terms of distance to schools Area 8 is closer to Middle and High schools than some areas, like Site 1, but no closer to first schools. The accessibility to these schools will vary depending on the school and public transport available. Travel Plans for any site will be needed to ensure accessibility is improved, especially by public transport.
Current provision 6.4.27 of the Study. It should be noted the absence of Abbeywood and St Stephen's	This paragraph refers to the closest first school which is Beoley First school, so these other schools would not be mentioned.

KEY ISSUE: Infrastructure – General

<b>Sub Issues</b>	<b>Officer response</b>
Reduced noise issues	If the respondent is suggesting there would be less noise issues after development, this is not likely to be a significant issue in any of the focussed sites which would weigh in favour of one site over another. However if the respondent suggests there are currently less noise issues, this will be dependent on where within the site a noise assessment is taken, as some parts will be more tranquil whilst others such as near the Birmingham Road/Scrap yard will be noisier.

<p>Impact on local services will be intensified by proposals to largely concentrate the build on a single site. It will be mitigated only by provision of new facilities or by spreading need over a number of locations to access existing resources. In this event, Area 8 is in closer proximity and has better road and direct transport links to the increasingly supportive healthcare roles provided by Birmingham, Coventry and Warwick.</p>	<p>This has been considered. The impact on facilities around Redditch would be more dispersed if a pattern of growth in many areas were to be chosen and this has its own drawbacks. Local healthcare would be considered to relate to Redditch as this is where the majority of people access their GP surgeries. In terms of other healthcare from areas further afield, there are potential accesses to strategic road networks on many of the focussed sites, therefore this is not a reason to weigh in favour of one site above another.</p>
<p>The conclusion for Area 8 section 6.4.85 states: <i>“It should be noted that the nearest facilities are within Bromsgrove District and this may work against the primary objective of providing sustainable development for Redditch’s needs”</i> This statement does not comply to Strategic Objective 2.1 Item 3: <i>“To support and enhance the vitality and viability and, where appropriate, the regeneration of Town Centres, District Centres and other centres in both Bromsgrove District and Redditch Borough”</i> which encompasses Bromsgrove as well as Redditch.</p>	<p>The facilities like schools, local shops, healthcare etc are more likely to be things that are not generally solely contained within a Town Centre, so the aim of ensuring there is good access to facilities is different to finding a scheme which could provide benefits to the Town Centres.</p>
<p>There is an existing High Pressure National grid gas main across Area 8. It could be modified to provide an immediately available gas supply to the site.</p>	<p>Domestic properties would not connect to the local high pressure gas mains that run across the site. There are Low pressure and Medium pressure mains that run along the edges of Area 8 and gas supply is not considered to be an issue on any of the areas.</p>
<p>Bordesley is closer to Redditch water supply distribution/network and is a more cost effective and sustainable solution.</p>	<p>On any site, water supply is not considered to be an issue which would constrain or prevent development, and there are no particular reasons why Area 8 is more favourable in this respect.</p>
<p>Bordesley closer to primary electrical supplies that serve Redditch i.e. the Ipsley Primary Sub-Station.</p>	<p>On any site, electricity supply is not considered to be an issue which would constrain or prevent development.</p>
<p>Bordesley closer to the main Redditch Telephone exchanges and telecom infrastructure. This is a more cost effective solution and is also better in terms of deliverability and sustainability.</p>	<p>There are no issues with access to telecom or broadband infrastructure on any of the broad appraisal sites which would constrain or prevent development, and there are no particular reasons why Area 8 is more favourable</p>
<p>The Roman road (Ryknild Street) most is a narrow country lane and is part of the sign-posted Avoncroft Cycle Way which leads to the city.</p>	<p>Noted.</p>
<p>Incorporate footpaths and cycleways. Whilst significant investment in walking and cycle infrastructure to provide accessibility is anticipated</p>	<p>There are always going to be site constraints that make walking and cycling more difficult in parts of large sites, but these can be designed</p>



<p>this would also be the case at Site 1 where topography is less accommodating.</p> <p>Area 8 will require significant investment in walk and cycle infrastructure.</p> <p>Topography would facilitate the provision of cycling routes and footpaths</p>	<p>in a way to make them more accessible. Agreed that the policy can be improved to ensure that development provides the best solutions to overcome this.</p> <p><b>ACTION: Amend either the Policy, third bullet point to include reference to safe walking or cycling routes, or ensure there is reference to site level requirements elsewhere in the BDC plan.</b></p>
<p>Developer has completed some of the necessary assessments and engaged in discussion with Council and utilities about planning. Likely that Area 8 could be brought forward for development earlier than Site 1.</p>	<p>Not all necessary assessments have been submitted to the Councils. There are however on-going discussion between the Councils and a number of infrastructure providers, including utilities providers. There is no evidence submitted to suggest that area 8 can be brought forward earlier than site 1.</p>
<p>There are three public rights of way within the area. These footpaths provide opportunities for potential residents to have good access to the Arrow Valley Park and local facilities.</p>	<p>Noted, there are footpaths in and around many of the potential sites which link to a number of areas within Redditch urban area.</p>

KEY ISSUE: Infrastructure – Health

<p><b>Sub Issues</b></p>	
<p>If the Alex Hospital is downgraded, emergency services can get onto the M42 in a couple of minutes.</p> <p>In consideration of the reduction of services at the Alexandra Hospital (including reduced A &amp; E), and the likely transfer of some NHS services to University Hospital Birmingham, it would make more sense to build these houses in Bordesley.</p>	<p><b>Officer response</b></p> <p>The Councils have had no response from emergency services or the NHS on this matter; however the strategic road network can potentially be accessed very easily from any of the focussed sites that have been appraised.</p>
<p>Faced with somewhat less unfavourable proximity for Area 8, the Study is able to conclude emphatically that “access to healthcare is poor with the nearest GP surgery approximately 2.85 km away”. The Study lacks consistency in its Area assessments of the accessibility of health services. Surely the prognosis for Area 4 and Area 8 “is poor”.</p> <p>The area is 4km from the services/facilities within Alvechurch and</p>	<p>It is noted that the closest existing GP surgery to Area 4 is 3.7km. The reference to area 8 having ‘poor access’ is relevant given that there is only one link onto the strategic road network in this location. If it is required new or extended GP surgeries can be provided alongside any proposed site.</p>

<p>5.1km to Redditch Town Centre. Access to health care could be improved if a medical facility were provided on site.</p> <p>HGDS section 5.97 states: “<i>meaning that there are very few services and facilities within walking distance</i>”. This statement refers to Area 8 and could be deemed accurate as the distance to the school is 3km, the GP surgery 2.9km and Alvechurch local centre 4km, however a similar statement does not appear in section 5.61 referring to Area 4 when the distance to the school is 3km (the same), the GP surgery 3.7km (further away), limited retail facilities in Webheath 3km (post office and grocers) and Batchley District Centre 4km (the same). No area is more favourable than another.</p>	<p>Distance to services/ facilities are identified as a weakness for both Areas 4 and 8 in the HGDS Executive Summary.</p>
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KEY ISSUE: Landscape

<b>Officer response</b>	
<p><b>Sub Issues</b></p> <p>Undulating hills are self-contained and do not spoil the landscape</p>	<p>Unsure how undulating hills can be self-contained. There are few areas in Area 8 that are undulating</p>
<p>A landscape which is comparatively flat</p> <p>Area 8 is only medium landscape sensitivity</p>	<p>This is correct but it makes this area difficult to visually contain</p>
<p>Only Medium Landscape Character, defined as not an undue constraint to choosing this area for development (Ref to Bromsgrove GI report)</p>	<p>Whilst it is preferable for development to occur in areas of low sensitivity all of the land around the periphery of Redditch is of medium or high sensitivity and therefore the medium sensitivity of this area is not an undue constraint that weighs heavily against the choice of this particular area.</p>
<p>Outside Landscape Protection Area and Area of Great Landscape Value</p>	<p>Furthermore, development in this location would be visually prominent due to the openness of the landscape and poor internal boundaries.</p> <p>These designations are no longer relevant, as Areas of Great Landscape Value were revoked with the abolition of the Structure Plan, and Landscape Protection Areas whilst being saved policies, have been superseded as it is now considered more appropriate to use the landscape character assessment.</p>
<p>Agricultural land quality no higher than 3a. Development of the Bordesley Site would avoid the adverse effect on the Government's target for sustainability on food. (Government target is 85% but our</p>	<p>The land bounding the River Arrow has a greater than 60% likelihood of being best and most versatile (BMV) agricultural land. Beyond this the remainder of the area has between 20.1% and 60% likelihood of</p>

<p>current UK level is 64% !)</p>	<p>being BMV agricultural land. As land is of a similar quality across all of the areas of focused appraisal, the loss would be equivalent in any area chosen and therefore it is considered a minor constraint to development. Although the Government does encourage food production, the NPPF guides Local Authorities to meet their objectively assessed needs.</p>
<p>Area 8 looks inwards to Redditch as opposed to looking out towards the Malvern's and the Cotswold's</p>	<p>This is not a valid reason to constrain development.</p>
<p>The developable area of Bordesley sits in the Redditch bowl mitigating the impact on landscape.</p> <p>Would it not be more in keeping with their (Bromsgrove) philosophy to place the houses in the 'Bowl of land ' in area 8 which overlooks the 'Bowl' that Redditch sits (Built Form and Rural and Visual Landscape Appraisal - Bromsgrove. 2002)</p>	<p>The 2002 built form and rural visual appraisal has since been superseded by the Worcestershire Landscape Character Assessment.</p>
<p>From the majority of area Redditch can be seen, and only on the furthest Eastern section can distant views of the country side be seen - minimally obtrusive into the wider landscape</p> <p>Site not visible when coming into Redditch from Alvechurch/ Bromsgrove as it sits behind higher ground of Rowney Green. It is no more visible from Redditch than any development would be on Area 4.</p>	<p>These comments concern landscape setting within area 8 looking out and not from a wider area looking in. The WMRSS panel report did acknowledge that there would be wider visual issues with this area. Panel Report para 8.82 states: <i>"In landscape terms we can appreciate that when looking north from Redditch the greater part of the Bordesley park area would be contained within ridge lines while some of the areas in and adjacent to ADRs would be on or close to ridge lines. However, the situation is not as clear-cut as that as, from some viewpoints nearer Alvechurch, parts of the suggested Bordesley Park land would be in clear view and, conversely, there are some areas of ADR and adjacent land that appear well contained in landscape terms."</i></p>
<p>The Redditch Borough Council Open Space Needs Assessment 2009 states that the West (adjacent to Area 4) is well catered for with a surplus of 4.81ha/1000 population but Abbey (adjacent Area 8) is poorly provided for with a deficit of -1.86ha/1000 population. Development in Area 8 would enable more open and amenity space to be provided</p>	<p>Irrespective of the development area, the Policy will require 'public open space creating a permeable layout with well-defined streets'.</p>
<p>Development here will not result in the loss of Worcestershire countryside</p>	<p>Development within any of the focussed areas would constitute a loss of 'countryside', and area 8 is no exception.</p>

<p>It could equally be said that Redditch Golf Club acts to separate Webheath/Foxydiade from Redditch Town.</p> <p>The Arrow Valley Park dissects Redditch in two already so to suggest that development at Bordesley would be any more difficult to integrate into the urban area is not a valid comment. Residents on a Bordesley development would be closer to the Town Centre than those in either Matchborough or Winyates, so it could be argued they would be more integrated.</p> <p>Much is made of various HECZ sites although the majority of development proposed by the developer does not spread in to these areas.</p> <p>Masterplan content is ignored when considering this site. Unfair to suggest that resulting impact on views to or from Rowney Green is of more importance than to or from other areas</p> <p>The precious value of the countryside in the Parish of Alvechurch (and Bordesley Park in particular) is confirmed in a letter sent to me on 4<sup>th</sup> August, 2009 from Mr Peter Langley, retired Deputy Director of the Government Office of the West Midlands, after the close of the Examination in Public of the West Midlands Regional Spatial Strategy Phase Two.</p> <p>We have read in the HGD Study (Area 8) that the development in the southern half can be visually contained (Page 172 paragraph 6.4.81). Development here would be extremely damaging to the special rural view from Redditch Crematorium (Grid Reference SP 0430 6880). This building has been so sited that surprise rural panoramic views open up to mourners when they enter the hall and as they make their way out. The potential development would destroy the views and deprive mourners of this unexpected asset.</p> <p>Most of the hillsides which surround Alvechurch Parish and the upper Arrow Valley with those of its tributary, the Dagnell Brook are designated as areas of Great Landscape Value or Landscape Protection Areas. Insensitive development could greatly damage or destroy the landscape, on the skyline as well as elsewhere while</p>	<p>Webheath area is still connected with built development in the vicinity of Birchfield Road.</p> <p>The proposed development area at Bordesley would sever the green links into the wider countryside from the park in a way that would affect the urban form. It is different with the former New Town areas because the park has a linear feature which is bounded by the built up areas, it doesn't flow into wider countryside.</p> <p>The HECZ covers all of area 8, and also all of the other 20 areas that have been analysed. They are not designations, they are character zones.</p> <p>Master plans of one site do not provide information that is useful for doing a comparative analysis of sites, although officers are aware of the plans.</p> <p>Noted, these constraints have been considered within the HGDS.</p>
	<p>Noted.</p>
	<p>These designations no are longer relevant, as Areas of Great Landscape Value were revoked with the abolition of the Structure Plan, and Landscape Protection Areas whilst being saved policies have been superseded as it is now considered more appropriate to use the landscape character assessment. The Landscape character</p>

there are a large number of other environmental, archaeological and historical features concentrated here.	assessment has been considered in the HGDS.
When descending the hill from the Bordesley Hall/ Rowney Green crossroads driving eastwards, there are spectacular views which would be destroyed by the Area 8 development.	Noted, these constraints have been considered within the HGDS.

KEY ISSUE: Sewage Treatment

<b>Sub Issues</b>	<b>Officer response</b>
More sustainable for sewage etc (see attached report from STW), (a gravity feed for waste and storm water)	Sewerage treatment is only one aspect of sustainability. Although it is of course likely that STW's preference for sites to be located where the costs to STW are lower, there are other considerations that lead to the selection of the preferred sites of 1 and 2.
Lower co2 levels than Foxlydiate/Mebeath, lower electricity costs than having to pump sewage etc.	There are no significant Co2 emissions differences between options around the Redditch area. Pumping sewerage which may be required elsewhere does not require significant electricity generation
Additional works at Bordesley estimated to cost only £100,000 Mainly to east of River Arrow – easier drainage	To check if this is right
The area in Bordesley is well drained	It is not correct that drainage by gravity would be taken from points to the east of the River Arrow; it would be relevant from points along the ridgeline which starts along the A448 at the north of Site 1. This is unknown until a detailed assessment is completed

KEY ISSUE: Sustainability

<b>Sub Issues</b>	<b>Officer response</b>
2 miles from Redditch Town Centre for jobs and accessibility	The distance from the centre point of Area 8 to the Town Centre is 5.1km or 3.2 miles. The routes to the Town Centre are well established from the edge of the area but it is beyond a reasonable walking distance and this is reflected in the HGDS.
Routes to the Town Centre are more direct and an easier option for walking.	The nearest supermarket is 1.5miles from the centre point of Area 8.
A main supermarket within 1 mile	Abbey Stadium is 2.21km from the centre and the south western part is 1.45km away. This has been considered within the HGDS.
Close to Abbey Stadium	Whilst it is difficult to prescribe how or where people will prefer to shop or access facilities, because the growth locations are all adjacent to
The location will also ensure that the new population will use Redditch rather than Bromsgrove because of its location	

	<p>Redditch it can be presumed that the majority of residents in any area will use Redditch facilities, however there are more opportunities for Bromsgrove Town Centre use with Site 1 being taken forward as an allocation.</p> <p>The enhancements to the railway stations are not related to this HGDS consultation; however such improvements are being sought through the CHYM project or through Network Rail's enhancement of the Alvechurch link to Redditch and associated improvements. Improvements are also being sought through the Infrastructure Delivery Plan in relation to cycle parking, improved signage to encourage trips to the railway station and cycle storage at the railway station.</p> <p>Agreed, this has been considered within the HGDS.</p>
<p>Link in cycleways with secure lockers at station - all these are environmentally friendly.</p>	
<p>Close to Abbey Stadium and Leisure facilities such as Abbey park Golf, several Churches, DIY, Fire Station, crematorium, existing employment opportunities, places of interest like Abbey Meadows, newly built Hotel and public houses and eating places</p> <p>Development at Bordesley would centralise Town Centre facilities geographically</p> <p>The spending power of residents in this area would keep the Kingfisher Centre viable.</p> <p>The area is 5.1km from Town Centre. This is incorrect. From centre of site, train station 3.7km (car) 3.2km (foot), town centre car parks 4.18km, Church Green by foot 2.8km.</p>	
<p>Likelihood of a heavy reliance on car transport realistically less than for Area 4</p>	
<p>Last paragraph of Area 8 section insinuates that residents may use</p>	<p>This is not a consideration which would favour development in any location</p> <p>The population increase will help to sustain services and facilities throughout Redditch, irrespective of the location.</p> <p>Distance measurements were measured from a central point within the site. This approach was taken to encourage consistency between areas considered. This means that parts of area 8 will be closer to facilities including those mentioned by respondents. The opposite is also true some parts of area 8 will be further away than the quoted distances.</p> <p>The distances quoted by the respondent may measure these distances in a different way.</p> <p>The HGDS states that development could encourage commuting to Birmingham where the economic benefits would manifest. Closer proximity to motorway junction could facilitate this by car. It is however unrealistic to suggest that a move away from car use will be altered, but public transport has potential to be more easily integrated into Site 1 than Area 8.</p> <p>Not necessarily. The HGDS merely points out the proximity to</p>

<p>Alvechurch facilities instead of Redditch. This is an example of how incorrect distances result in false judgements. Alvechurch is stated as being 4.04km, which against the documented figure of 5.1km to Redditch, could suggest it supports using Alvechurch services. When the real distance figure for Redditch Town Centre of 4.1km is used, the argument is much weaker. Is it realistic to assume someone would shop at Alvechurch with limited facilities/services, when the Kingfisher Centre with a huge array of shops and services is on the doorstep and a superstore exists just down the road?</p> <p>There is less likelihood of the suggested regeneration happening at Bromsgrove than might have been the case at Site 1 but the benefits for Bromsgrove are only speculative and, since the development is for Redditch housing stock, it is appropriate that this impact should be felt in Redditch.</p>	<p>Alvechurch services and facilities to area 8 (para 6.5.25).</p> <p>Distance measurements from area 8 were measured from a central point consistent with other areas. This approach was taken to encourage consistency between areas considered. This means that parts of area 8 will be closer to facilities including those mentioned by respondents. The opposite is also true some parts of area 8 will be further away than the quoted distances.</p>
<p>The assessment of Area 8 in relation to accessibility to local facilities fails to fully take account of the Church Hill local centre which is located within walking and cycling distance of the site. This area is currently being redeveloped which will increase the facilities and amenities in the area. As indicated above, Area 8 can deliver a local centre on site which could include retail, education and medical land uses which will reduce the need to travel outside the development.</p>	<p>Whilst it is difficult to prescribe how or where people will prefer to shop or access facilities, because the growth locations are all adjacent to Redditch it can be presumed that the majority of residents in any area will use Redditch facilities, however there are more opportunities for Bromsgrove Town Centre use with Site 1 being taken forward as an allocation.</p>
<p>The assessment of Area 8 in relation to accessibility to local facilities fails to fully take account of the Church Hill local centre which is located within walking and cycling distance of the site. This area is currently being redeveloped which will increase the facilities and amenities in the area. As indicated above, Area 8 can deliver a local centre on site which could include retail, education and medical land uses which will reduce the need to travel outside the development.</p>	<p>Para 6.4.31 of the HGDS addresses the facilities at Church Hill District Centre. Furthermore, redevelopment of Church Hill District Centre will not increase facilities and amenities in the area.</p> <p>Development in any location will address the needs for additional local facilities and area 8 is not an exception to this.</p>

**KEY ISSUE: Transportation - Funding**

<p><b>Sub Issues</b></p> <p>Taylor Wimpey, when they submitted their planning application for 200 dwellings at Webheath were informed there is a Worcestershire CC Transport/Highways Levy of c£3,000 per dwelling. Developing at Bordesley always raises the question of a possible bypass being built and then who will pay for it etc. If you received £3,000 for 2,000 dwellings it gives you £6 million, which is a good starting point for future consideration. Development at Brockhill East, East of the railway line will provide a new roundabout at Weights Lane/ Birmingham Road all adding to reasons why this area should be re-</p>	<p><b>Officer response</b></p> <p>The Transport Infrastructure evidence for both Councils is in draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. Therefore it is not appropriate to collect through S106 or future CIL for a scheme that is not required. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council areas.</p> <p>The roundabout east of the railway line on Weights Lane has planning</p>
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<p>considered for development purposes.</p> <p>Gallaghers have already offered to pay to extend the already existing by-pass</p> <p>Development here could potentially encourage progression of the Bordesley Bypass, alleviating current traffic congestion.</p> <p>Whilst the Bordesley By-Pass does not necessarily have to be constructed to allow the development of Area 8 it would be beneficial in that it would reduce existing traffic flow at Dagnell End Road junction.</p> <p>Understand that developer liaising with officers has planned mitigation measures on the Dagnell End Road and has set aside land and an appropriate contribution towards building the Bordesley bypass. This should satisfy to a large degree the WCC requirement that funding for delivery of the bypass must be developer led.</p> <p>Bordesley Bypass could mainly be carried 'off line' ensuring little disruption to the travelling public</p> <p>Area 8 is defined by four roads and the impact of traffic would be focussed particularly on two of them rather than on a single dual carriageway and a network of small lanes as in Site 1. The A441 especially the Dagnell End Road junction which is the busiest in Redditch will need work to cope with the extra traffic generated by any development. A Bordesley Bypass could contribute to mitigation measures by diverting, easing and regulating traffic flow.</p>	<p>permission associated with the Weights Lane scheme, and is not therefore related to Area 8 being delivered.</p> <p>WCC have identified the transport schemes required to mitigate the impact of total travel demand generated by the preferred development growth plan as a whole and as set out by the Local Planning Authorities. These measures have been developed on the basis of the total quantum and distribution of the travel demand forecast to be generated by the planned developments and taking account of the pressure that this places on the various parts of the highway, public transport, walk and cycle networks.</p> <p>It is expected that, in the event of the planned developments progressing to Planning Application stage, the promoters will develop detailed proposals for highway schemes which mitigate the adverse impacts of generated traffic. This may result in changes to the mitigation measures, but this will be dependent upon the evidence provided by the scheme promoters and will be subject to the Development Control process at both the pre-application and planning application stage.</p> <p>In the event of changes to the development plan in terms of type, quantum and location, WCC would assess the impact on the transport network and if required, revise the transport infrastructure measures needed to mitigate the impacts of generated travel demand.</p> <p>Similarly, if development proposals are brought forward which are in addition to those set out in the current plan, WCC would assess the impact on the transport network and if required, revise the transport infrastructure measures.</p> <p>The Transport Infrastructure evidence for both Councils is in draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council</p>
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	areas. This could impact on the viability of the site and potential for other infrastructure provision on site.
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KEY ISSUE: Transportation – Public Transport

<b>Officer response</b>	
<b>Sub Issues</b>	
Excellent bus services	The site is undeveloped like other potential sites and therefore does not benefit from excellent bus services through the site. From the centre point of the site, there is an unreasonable walking distance to the nearest bus stop.
Provision of public transport will be cheaper in this location	Area 8 would require a new bespoke bus system which would be costly, whereas in other locations existing networks could be enhanced and expanded.
Bordesley has better rail links	Alvechurch rail station and Redditch rail station are closer to Area 8 than some other areas looked at in the detailed site appraisals. This would still be encouraging travel to the stations by car and out commuting.
There is a new railway station construction in Alvechurch to provide additional service to Area 8. Why is this not mentioned in the "Housing Growth Background Document-January 2013" .	Although Area 8 falls within Alvechurch Parish, there is no new railway station construction to serve area 8. The proposed enhancements at Alvechurch station will have a positive impact on rail services to and from Redditch as a result of the passing loop and the frequency of trains from two to three per hour. This doesn't impact more significantly on any particular growth proposal for Redditch than others.
Opportunity to construct new railway platform to allow commuters travel to Birmingham or Redditch town	Improvements to increase trains to three per hour between Redditch and Birmingham will increase the service for commuters. An additional station is considered an unviable option and the need for additional stopping points between Redditch and Alvechurch is unnecessary.
Planners could encourage the siting of another railway station at Bordesley	
A case could be made for an intervening station as part of the rail upgrade project	The proposed enhancements at Alvechurch station will have a positive impact on rail services to and from Redditch as a result of the passing loop and the frequency of trains from two to three per hour. This doesn't impact more significantly on any particular growth proposal for Redditch than others.
The close proximity of future development to Alvechurch and Redditch stations was an important consideration to Network	

<p>Rail when making the decision to enhance Redditch Branch. Redditch Station is a similar distance from both Area 4 and Area 8) only 0.5km difference) and so a deciding factor on the sustainability of each area when considering rail travel is the distance to Alvechurch Station.</p>	<p>Para 6.4.18 of the HGDS takes the footpath network into account.</p>
<p>Good potential links into the wider Redditch pathway and cycleway system</p>	<p>Distance to the Town Centre is not the only determining factor when identifying development locations. Area 8 would require a new bespoke bus system which would be costly, whereas in other locations existing networks could be enhanced and expanded.</p>
<p>Concentration of development at one location closest to the town centre offers the maximum potential to improve and integrate public transport links.</p>	<p>Although Area 8 falls within Alvechurch Parish, there is no new railway station construction to serve area 8. The proposed enhancements at Alvechurch station will have a positive impact on rail services to and from Redditch as a result of the passing loop and the frequency of trains from two to three per hour. This doesn't impact more significantly on any particular growth proposal for Redditch than others.</p>
<p>Rail access to destinations for employment outside of Redditch</p>	<p>Access to cycling and walking routes are comparable for both areas. Route 55 of the Regional Cycle Network was considered as part of the HGDS (para 6.4.23). Area 8 would require more investment to improve the public transport network than site 1.</p>
<p>Area 4 is located adjacent to the National Cycle Route 5 which is part of a long distance cycle network through England &amp; Wales as stated in section 6.1.26. Area 8 is located adjacent to the Regional Cycle Route 55, which runs along the southern border of Area 8 on Icknield Street, which is part of a local cycle network from Redditch to Kings Norton as stated in section 6.4.23. Part of section 6.4.47 of the Housing Growth Development Study states: "Area 8 will also require significant investment in walk and cycle infrastructure in order to provide the necessary level of accessibility to/from the area and to maximise the use of sustainable modes of transport from the site". This statement applies equally to Area 4 as evidenced by the closeness of cycle routes to each area.</p> <p>Significant investment no different to Area 4 or any other sites. For some reason the potential high cost of this is mentioned for this site but not for others.</p>	<p>WCC have indicated that area 8 would require a new bespoke public</p>
<p>If bus route 52 were to be extended into Area 4 this could as easily</p>	<p>WCC have indicated that area 8 would require a new bespoke public</p>

<p>be extended into Area 8 as the service also serves Bordesley</p> <p>Other routes that could easily be diverted into Area 8 are numbers 146, 182, 183, 517 &amp; 519</p> <p>In relation to the public transport the indication is that Area 8 would require a costly bespoke service. However the Church Hill area is served by several public transport routes, with some routes operating along Icknield Street and adjacent to Area 8. There is the potential that these services can be diverted into the site. Therefore this site can be accessed via public transport without the need for a bespoke newly commissioned route.</p> <p>It is suggested that as the centre of the site is 1.7km from existing bus stops, this is beyond reasonable distance. This is not an argument against development, as such a scale development would include bus stops at numerous points</p> <p>It states the area is 4.3km to Redditch Train Station when measured on a map. Using footpaths alongside roads, the distance is actually 3.7km.</p> <p>Pedestrian access to Alvechurch Station from Area 8 is remote. From the far end of which, the walk is at least 1 hour 15 minutes with a sizeable hill in the way. The approach to Alvechurch Station and the size of the forecourt does not easily lend itself to access by bus.</p> <p>Limited public transport</p>	<p>transport system.</p> <p>This is not used as an argument against development, it forms part of the analysis of all sites.</p> <p>Distance measurements for all areas were measured from a central point. This approach was taken to ensure consistency between areas considered. The distances quoted by the respondent may measure these distances in a different way.</p> <p>Para 6.4.25of the HGDS recognises that this is beyond a reasonable walking distance.</p> <p>Noted. This has been considered within the HGDS.</p>
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KEY ISSUE: Transportation – Road Infrastructure

Sub Issues	Officer response
<p>Not country lanes as in Webbeath/Foxydiatate</p> <p>Bordesley is located within 10 mins of the M42, close to the motorway network for jobs and accessibility.</p> <p>Document does not mention the fact that the location of area 8 makes it ideal for linking to the M42, without creating major traffic</p>	<p>Disagree. There are similar country lanes within and around all sites.</p> <p>Agreed that this site is well placed to access the motorway network. However, there are sustainability concerns about allocating a site that will encourage out-commuting by car.</p>

issues elsewhere, as will occur with other sites	
Access to highways to destinations for employment outside Redditch. Irrespective of construction of the Bordesley Bypass, area located close to A441 therefore good and varied access to range of major roads including M42S, M42N and M40	
Adequate roads and highway infrastructure locally	
Access for the Area 8 development site in Dagnell End Road is easy	The existing road network would need improvement to support development; this is true of all potential development sites. Access is direct to the Strategic Road Network for the focussed site areas.
All modes of transport would be reduced in terms of distance	It is assumed this comment refers to the distance from existing facilities within Redditch, this has been considered as part of the HGDS.
Opportunity to build a bridge to allow a Northern link to Brockhill	There is already an access via Weights Lane which would be upgraded to enable development at Brockhill.
Plans & cost were made during the Atlantic Beacon project to make a single track road from Sainsbury's to the island south of Alvechurch to alleviate the bottle neck at Dagnell End	Noted. The planning permission for the Bordesley Bypass has now lapsed.
Existing residents / commercial enterprises - most will benefit from better transport links	Such benefits could be achieved on all potential development sites.
Windsor Rd is a bottleneck with the bridge for Birmingham area traffic, A441 north of Sainsbury's is a bottleneck	The Bromsgrove and Redditch Transport Network Assessment and Mitigation Reports (TNAMR) have identified locations where forecast traffic growth will result in junctions being at or over capacity, and identified schemes to mitigate the impact. It is expected that, in the event of the planned developments progressing to Planning Application stage, the promoters will develop detailed proposals for highway schemes which mitigate the adverse impacts of generated traffic. These mitigation measures will be considered by the Highway Authority within the more detailed Development Control process at both the pre-application and planning application stage as part of their assessment of the proposed development.
The access to Redditch Town Centre from Bordesley is mainly by dual carriageway not impacting on built up urban areas.	All potential development sites can access the Town Centre via dual carriageway.
Bordesley benefits from wide, free flowing main roads with little or no	Disagree. There are agricultural and equestrian businesses within the

farm machinery movement or equestrian usage.	site that use the surrounding roads. This constraint is not specific to Site 1 only.
The by-pass would enable raw materials to be easily transported to Redditch and finished goods to be easily transported by the motorway system via junction 2 of the M42, to markets in other parts of the country and abroad.	All of the sites subject to focused site area appraisal have potential access to the strategic road network.
The Travel Destination from Development Areas map highlights that around 46% of traffic will be destined for locations other than Redditch/Bromsgrove, in fact around 32% of the traffic is expected to travel to Birmingham based locations anyway, wherever the final development sites are located. The statement for Area 8 does not take account of the Travel Destination study, and is being used to prejudice the reasoning behind the discounting of Area 8 for development.	This Map does not display percentages. All sites have been considered equally with regards to transport evidence; for Area 8 this is detailed in paragraph 6.4.45 and for Area 4 this is detailed in paragraph 6.1.44 of the HGDS.
Development in this location is likely to exert pressure on the A441 and the A435 northwards thereby exerting some pressure on the Strategic Road Network.	Noted. The HGDS takes this into consideration.
The small roads of Icknield Street, Storage Lane, Watery Lane and Lilley Green Road are unsuitable for increased traffic volumes.	Noted, it is likely that every potential development site may require upgrades to the existing road infrastructure to cope with increased traffic volumes.
Access to Redditch town centre is only via a bottleneck at the western end of Dagnell End Road.	
Traffic gridlocks as a result of M42 closures	Noted, this is not unique to the M42 or Redditch.

**KEY ISSUE:** Historic Environment

<b>Officer response</b>	
<b>Sub Issues</b>	
There are listed buildings along Storage Lane and Icknield Street that would also come under threat.	This has been considered in the HGDS (paragraph 6.4.68). Listed buildings have a statutory protection; however the presence of them does not necessarily preclude development.
There are many places of historic and archaeological interest in this sector of the green belt which are listed in the Register of Worcestershire Countryside Treasures (Feb 1973), in a report by Dr Della Hooke, Birmingham University 1989/90, for Worcestershire County Council and the Countryside Commission and in the Historic	All relevant historic assets have been identified from the Historic Environment Record and taken into consideration in the HGDS.

<p>Environment Record of the Worcestershire Archive and Archaeological Service.</p> <p>The area between Dagnell Brook and the river Arrow with Storage Lane on the north constitute the manor of Osmerley. This was given to Bordesley Abbey in the mid-12<sup>th</sup> century and remained part of the abbey demesne until the dissolution of the abbey in 1539. It was then transferred by the crown to the Windsor family (later Lords Windsor and then Earls of Plymouth), and became known as Bordesley Park. It was sold during the Interregnum to the wealthy ironmaster Thomas Foley and remained in his family until the early 19<sup>th</sup> century. The area became divided into Bordesley Park, Bordesley Park Farm and Lower Park Farm. The whole area thus has a historical integrity.</p> <p>Site of Medieval hunting park.</p>	
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**Bordesley (Area 8) – Support for Exclusion of Site**

KEY ISSUE: Reasons to exclude Bordesley general comments

<b>Sub Issues</b>	<b>Officer response</b>
<p>RSS examination in public Inspector found against developing Bordesley</p>	<p>Noted, the VMRSS Panel Report considered the recommendation of Bordesley as the preferred location for cross boundary growth (WYG 2), however felt the study was not sufficiently robust to support a detailed designation at Bordesley. The Panel Report concluded that Bromsgrove Council should determine the choice of locality around the Redditch boundary to accommodate around 3,000 dwellings to meet Redditch growth (paras. 8.82 - 8.84).</p>
<p>Development will destroy the rural character of Rowney Green</p>	<p>Noted, this has been taken into account in the HGDS (paragraph 6.4.58).</p>
<p>The area is used on a regular basis by ramblers, cyclists and horse riders.</p> <p>There are multiple riding stables in the Area 8 that provide recreation.</p>	<p>Noted, these are common uses in all semi-rural areas and therefore in all of the potential development sites.</p>

<p>A fishery has been established within Bordesley Park.</p>	
<p>Evidence that two of the large fields at the northern end of Area 8 are subject to a restrictive covenant which forbids building within sight of Storage House.</p>	<p>From a legal perspective, it is possible to vary or revoke restrictive covenants with consent of the beneficiaries via a deed of variation/revocation.</p>
<p>Support for the SWOT analysis in the Housing Growth Executive Summary</p>	<p>Noted.</p>
<p>Many of the listed houses in area 8 have their own supply of Well water which could be contaminated by seepage from building in the area.</p>	<p>Development would not be permitted to contaminate water sources.</p>
<p>Development at Bordesley is not envisaged as part of the Alvechurch Neighbourhood Plan for at least the next 15 years or so and is premature to planning for the housing needs of BDC and Alvechurch Parish</p>	<p>Noted, however Neighbourhood Plans must be in conformity with the Development Plan which must plan to meet the objectively assessed housing needs</p>
<p>Very large number of visitors who come from the city, Redditch and even from overseas, to enjoy the varied informal leisure activities, giving great economic and social value to this very narrow sector of the green belt around Birmingham.</p>	<p>Noted.</p>
<p>The Worcester and Birmingham Canal. Fishermen are often seen along its banks. Several local boatyards hire narrow boats for holidays. This attracts many overseas visitors who enjoy the distant rural views across the valley as they set off on their tour</p>	<p>Noted.</p>
<p>Bordesley Abbey Visitor Centre and Forge Mill Museum are on the southern side of the disparked medieval Bordesley Park, just within Redditch Borough.</p>	<p>Noted.</p>

### Area 11 - Support for exclusion of Area 11

KEY ISSUE: Support for exclusion of Area 11 - General

<b>Sub Issues</b>	<b>Officer response</b>
Support exclusion due to Area 11 including a section of the Worcester and Birmingham Canal and Shortwood Tunnel. Reduced Area 11 included land at risk from flooding associated with Cofton Reservoir, Upper Bittel and Lower Bittel Reservoirs	Agreed. The larger area 11 was discounted at the Broad Area Appraisal stage, partly because it includes a significant number of environmental designations including the Canal section. The reservoirs noted are at least 2 miles north of the site and risk of flooding is likely to be much higher from the River Arrow which flows through the site. The extent of the flood risk would not be known until detailed Flood Risk Assessments are completed for any site.
In light of various significant constraints Area 11 is not appropriate for large scale development	Agreed, constraints within area 11 have been noted within the HGDS. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations.

KEY ISSUE: Area 11 as an alternative location - General

<b>Sub Issues</b>	<b>Officer response</b>
Area 11 could be utilised Area 6 brought forward. As Area 6 is proposed, it's difficult to understand why Area 11 hasn't, especially when developer's proposals demonstrate a viable option for housing and employment which would improve sites sustainability credentials. Shares may advantages of Area 6 adjacent.	Area 11 has been assessed on its own merits and although it adjoins area 6 it contains other constraints that are not found within area 6 - for example potential flood risk from the River Arrow and lack of strong and defensible Green Belt boundaries to take the required growth. Development in area 11 would be less sustainable than the proposed sites 1 and 2.
Smaller area 11 could be utilised, including a route for the Bordesley Bypass.	The Transport Infrastructure evidence for both Councils is in draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. Therefore it is not appropriate to collect through S106 or future CIL for a scheme that is not required. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council areas



<p>Though parts more appropriate for employment uses it's rejected on the grounds that Redditch is well supplied at Winyates Green, Gorcott and Ravensbank. Housing equivalent stated to be 537 dwellings and the identified area is sufficiently enclosed so that the impact on Green Belt potentially reduced. Could be brought forward for delivery within five years.</p>	<p>For the purposes of this cross boundary work, no additional cross boundary land for employment purposes is required.</p> <p>After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations. As such it is considered unnecessary to release any land within area 11 (para 6.5.83) for housing.</p>
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KEY ISSUE: Flood Risk

<p><b>Officer response</b></p>	
<p><b>Sub Issues</b></p> <p>In Area 11 the majority of the area is located on Mercia Mudstone formation, Secondary Aquifer. There is an authorised landfill (Weights Farm) that would require consideration (see comments for site 2). There is Flood Zone 2 and 3 associated with the River Arrow (classified Main River), plus smaller tributaries. Development should be located within Flood Zone 1 with sufficient protection given to the watercourse corridor.</p>	<p>Landfill by Weights Lane noted.</p> <p>The extent of the flood risk within area 11 would not be known until detailed Flood Risk Assessments are completed for any site. These constraints have been considered within the HGDS. Flood Zones 2 and 3 and noted as constraints to development.</p>

KEY ISSUE – Landscape

<p><b>Officer response</b></p>	
<p><b>Sub Issues</b></p> <p>Landscape impact in area identified for potential on the openness of the Arrow Valley makes it highly unattractive</p>	<p>Landscape and Topography of area 11 is considered within section 6.5.6 of the HGDS which states it is located in “an area of high landscape sensitivity risk”. This level of risk is similar to the other areas subject to this Focused Area Appraisal, therefore sensitive design would be required to mitigate the impact on the landscape. That the majority of the eastern section of area 11 is flat being the River Arrow flood plain is also noted.</p> <p>Whilst it is preferable for development to occur in areas of low sensitivity, all of the land around the periphery of Redditch is of medium or high sensitivity. However, area 11 is not proposed for</p>

<p>Wedge of land between Butler's Hill Wood and the railway should be excluded. If this is left as a scrap of otherwise useless land as a result, plant it with trees as an extension to the wood</p>	<p>development. Whilst considered in the focused area appraisal, the area of land described has been excluded for housing development. Furthermore, area 11 was not proposed for development as part of this consultation. In addition as the land is privately owned both local authorities have limited control over planting trees on the land.</p>
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KEY ISSUE: Transport

<p><b>Officer response</b></p>	
<p><b>Sub Issues</b></p> <p>Poor judgments used relating to the encouragement of travel to Birmingham for Area 11. As with Area 11, residents will travel to their place of work regardless of location</p> <p>To suggest that 'development in this location will encourage travel by car more than some of the other areas being appraised' may be a true, but there are other sites (Area 4) which would necessitate car travel more - wording used infers it may be the worst location but it is not.</p>	<p>True, the location of site will not stop residents from travelling to their place of work however it is considered that area 4 is more likely to attract residents who work in Redditch than further afield.</p> <p>This incorrectly quotes the HGDS. The study doesn't claim area 11 will encourage travel by car <i>more than</i> some of the other areas. Wording used within the HGDS (para 6.5.26) is justified as "<i>the majority of services and facilities are beyond a reasonable walking distance</i>". Thus "<i>it is considered that development in this location would encourage travel by car</i>". This wording used doesn't necessarily suggest area 11 is the worst site for this issue.</p>
<p>No mention for Areas 8 or 11 of Bordesley Bypass</p> <p>Areas 8 and 11 include a bypass at developers cost, providing significant improvement to the highway network and improvement in conditions for the residents at Bordesley.</p> <p>Development at any other site would add to traffic flows on the A441 (approx.7% of destinations from new development would be to Longbridge, 8% to Birmingham City Centre/Selly Oak/University all of which would be likely to utilize the A441), so the ability to have this part of the highway network upgraded/improved at no cost to the tax payer should on its own merits be a prime factor for supporting development here</p> <p>"There are a number of narrow country lanes which would require</p>	<p>The Transport IDP for both Councils is draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. Therefore it is not appropriate to collect through S106 or future CIL for a scheme that is not required. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council areas.</p> <p>Even with a guarantee that a bypass would be provided it is unclear at this stage whether this would impact on other requirements for a scheme, such as affordable housing or design and build standards.</p>
<p>"There are a number of narrow country lanes which would require</p>	<p>This quote is taken from the broad site appraisal within the HGDS</p>

*significant upgrading to accommodate additional traffic flows. This could mean there may be significant infrastructure costs". Why is this factor not mentioned in initial appraisal for Area 4 which has just as many narrow country lanes, as does Webbeath?*

(para 5.136). An existing infrastructure deficiency was acknowledged at the broad site appraisal for area 4 (para 5.64). Notwithstanding this, both areas 4 and a reduced area 11 were considered to be worthy of further consideration for a focused site appraisal as the study has comprehensively considered a number of strategic objectives for each site.

The fact that narrow lanes were not specifically mentioned does not mean the factor was not considered in all the focussed site appraisals. Access to potential development may mean that narrow country lanes are not necessarily required as access points. The exact details of the new transport arrangements will not be known until a detailed Transport Assessment is undertaken.

In addition to this transport modelling work on various scenarios for locations of cross boundary development was commissioned in November 2012. This modelling work concluded that development in area 4 is likely to exert the main pressure on the A448, the Slideslow roundabout and the A38 running north to Junction 1 of the M42. This does not mean there will be no impact on the surrounding lanes and that significant improvements will not be required. The impact on highways infrastructure is not seen as a barrier to development (HGDS, paragraph 6.1.45).

**KEY ISSUE: Sustainability**

**Sub Issues**

Site close to Redditch Town Centre and all its services, yet still the distances stated are questionable.

Not enough is made about the location in relation to Abbey Stadium. Where it says it is 1.4km away, parts of 11 are only a few tens of metres away.

The Town Centre is easily reached on foot.

**Officer response**

Distance measurements from area 11 were measured from a central point within the site, which is consistent with other areas. This approach was taken to encourage consistency between areas considered. This means that parts of area 11 will be closer to facilities including those mentioned by respondents.

The HGDS acknowledges that certain facilities are within walking distance of area 11 (para 6.5.30) which could encourage healthy

	lifestyles. However it is considered that the majority of services and facilities are beyond a reasonable walking distance.
Is it really considered that residents would travel to the limited shops and services in Alvechurch, when a Sainsbury's superstore, the Kingfisher Centre and other facilities are literally down the road from this site?	Not necessarily. The HGDS merely points out the proximity to Alvechurch services and facilities to area 11 (para 6.5.25).

KEY ISSUE: Green Belt

<b>Officer response</b>	
<b>Sub Issues</b>	
Concerns of coalescence are raised where the area runs north towards Alvechurch and Bordesley. The distances between the northern most tip of the area is significantly further away from Alvechurch than the tip of Area 4 is to Tardebigge where coalescence not considered a problem.	In the HGDS assessing area 4 paragraph 6.1.53 raised the concern that part of the "part of the area could merge with Tardebigge to the north, Banks Green and Upper Bentley to the west." Issues of coalescence were then considered in the assessment for area 4. It is not considered that the proposed developable area, site 1, would cause coalescence with Tardebigge. Similar issues were raised with area 11 in terms of impact to Alvechurch and Bordesley (paragraph 6.5.55).
The new bypass could also create strong Northern boundary.	A wide range of issues were considered in the HGDS which led to sites 1 and 2 being chosen as the most sustainable option. Existing defensible boundaries are always more preferable for defining long term green belt boundaries on a site to provide more certainty going forward. The HGDS has considered these constraints. Any bypass through area 11 is unlikely to provide a northern boundary.
To suggest that ribbon development of Bordesley is relevant to coalescence is hypocritical considering southern boundary of Webheath ADR contains ribbon development. Eastern side of Area 4 contains ribbon development along Foxlydiat Lane but this is not considered.	The point made in the HGDS at para 6.5.55 is on the basis that development in area 11 would lead to coalescence with Bordesley. Ribbon development is mentioned because that is the nature of the small settlement at Bordesley.  Webheath would not be impacted in terms of coalescence as it is already part of the larger Redditch urban area as is the development along Foxlydiat Lane.
If the reserve option of an extension of the area beyond the ridge to	The HGDS considers the ridge, within area 6, to be of value in

the pool in the valley bottom were adopted, it would be natural to extend it north to Butler's Hill Wood.

reducing the risk of encroachment within the Green Belt. It is also considered that development beyond the ridgeline would lead to encroachment (HGDS, Paragraph 6.3.60). A reserve option for development beyond the plan period to 2030 is not currently being considered.

**Miscellaneous**

KEY ISSUE: Support for development

<b>Sub Issues</b>	<b>Officer response</b>
<p>The best solutions from the evidence provided by RBC and BDC Officers are to either develop Areas 4 (Foxydiolate) and 6 (Brockhill East) or Areas 6 (Brockhill East) and 8 (Bordesley). I believe these options are the only two that should in any form be considered further. I support either of these two options.</p>	<p>Noted, however 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>The sites suggested are considered to be appropriate because they offer an opportunity to develop sustainable urban extensions which are well connected to Redditch town centre by improved public transport provision and new cycle links.</p>	<p>Noted</p>
<p>The level of growth directed towards site 1 is considered to be sufficient to allow the provision of day-to-day facilities to meet the needs of local residents and reduce the need to travel, the requirement to provide a primary school is of particular note.</p>	<p>Noted</p>
<p>Site 2 is considered to be a natural extension to the existing Local Plan allocation and the requirement for it to be integrated with that site is welcomed as this will allow residents to benefit from new services and facilities in order to reduce the need to travel.</p>	<p>Noted</p>
<p>The sites selection has clearly considered other sites and a Sustainability Appraisal has been prepared to look at the sustainability implications of all of the sites considered including those which form the preferred option and the basis for consultation.</p>	<p>Noted</p>
<p>There is likely to be sufficient land available within Flood Zone 1 ('low probability') for both preferred sites, where development is appropriate in line with the Technical Guidance to the National Planning Policy Framework (NPPF).</p>	<p>Noted</p>
<p>We have no objection in principle to these proposals for development of sites 1 and 2, as specified in the consultation documents</p>	<p>Noted</p>
<p>Acknowledge the Councils requirement to identify land for new housing and employment and the assessments indicating these may be the most sustainable locations.</p>	<p>Noted</p>

<b>Sub Issues</b>	<b>Officer response</b>
Impressed with the joint working of the two local authorities and would have accepted the outcome from such an apparently unbiased process.	Noted
The suggested outcome seems entirely logical as an extension to Redditch's need for housing	Noted
A failure to work together negates either Councils Local Plan given the lack of available land in Redditch	Agreed, the Councils are working together to meet Redditch's growth needs.
This positive approach to accommodating Redditch's needs which cannot be met within its own boundaries is welcome.	Noted
The sites identified for development appear to have been chosen on the basis of thorough environmental and accessibility assessment, consideration of Green Belt policy objectives and consideration of infrastructure requirements.	Noted

KEY ISSUE: Alternative locations for development

<b>Sub Issues</b>	<b>Officer response</b>
Are the Council sure they have investigated every avenue in cross border chats with e.g. Stratford District Council? What evidence is there of meaningful and full discussions with Stratford in line with the Localism Bill.	Both Redditch and Bromsgrove Councils consider they have fulfilled the requirements of the Localism Act in terms of the duty to cooperate. Stratford on Avon District Council was consulted on the HGDS which considered and assessed areas within Stratford District for potential to meet Redditch Housing needs.
Area 6 (Brockhill East), Area 8 (Bordesley), Area 11 and a reduced capacity Area 5 (Hewell / Tack Farm) could between them cope with housing growth required and would sensibly spread the load across the four areas.	The advantages of "spreading the load" of housing growth across a number of sites was considered within the HGDS (paragraph 8.12). 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.
Weights Lane and Bordesley, straddling the A441	This location relates to Area 11 which was considered within the HGDS. It was considered that "development within Area 11 is not suited to large scale house building due to the limited ability to constrain development and control urban sprawl in the Green Belt" (HGDS, Paragraph 6.5.83).
Bromsgrove land between Church Hill and Beoley	This location relates to Area 10 which was considered in the Broad

Sub Issues	Officer response
<p>Land to the east of Church Hill bordered by the B4101 Beoley &amp; A435 Portway (the Beoley triangle) has potential for development</p>	<p>Appraisal in the HGDS. It was considered that “development in parts of this area would mean that Beoley would merge into Redditch and cause significant harm to the Conservation Area and associated Listed Buildings” (HGDS, Paragraph 5.129).</p>
<p>Area 5 - Hewell/Tack Farm</p>	<p>HGDS Paragraph 6.2.110 states “it is considered that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park, raises substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch Borough.”</p>
<p>Area 1 - Crabbs Cross to Astwood Bank</p>	<p>Area 1 was discounted at the broad site appraisal stage due to the advantages being greatly outweighed by the disadvantages, for example “significant Green Belt harm caused by coalescence of Redditch and Astwood Bank” (HGDS, paragraph 5.31).</p>
<p>Studley</p>	<p>The areas surrounding Studley (13, 14 and 15) were discounted at broad site appraisal stage for a number of reasons including significant Green Belt and environmental implications (HGDS, paragraphs 5.165, 5.177, 5.189). These areas are within Stratford-on-Avon District who will plan for the level of growth for Studley.</p>
<p>Beoley:</p> <ul style="list-style-type: none"> <li>* Develop an area which has good existing road infrastructure and links to major A-roads.</li> <li>* Develop an area which already has schools close.</li> <li>* Develop an area which already has good public transport inks.</li> <li>* Develop an area which is close to the town centre in order to reduce transport costs on the environment.</li> <li>* Develop an area which is close to existing leisure and sporting facilities.</li> <li>* Develop an area which is already on National Electricity, Gas and Water networks.</li> <li>* Develop an area which would also allow expansion in the future whilst being cognisant of all the above.</li> <li>* Develop an area which has the least impact on the FEWEST number of residents</li> </ul>	<p>These comments relating to the development of Beoley are relevant in terms of assessing the sustainability of an area, however there are more issues to consider when assessing a site for example the impact to Green Belt, Environmental and Historic constraints which are also relevant to developing around Beoley. The methodology used in Section 3.14 for the focused sites addressed some of the issues that have been mentioned:</p> <ul style="list-style-type: none"> <li>• Road Infrastructure, Schools &amp; Public Transport – Para 3.19 Accessibility.</li> <li>• Town Centre, leisure and sport – Vitality and viability – Para 3.19 &amp; 3.22.</li> <li>• Existing infrastructure networks – Infrastructure Capacity – Para 3.24.</li> <li>• Allowing future expansion – Green Belt Assessment section starting paragraph 3.29 follows government guidance in ensuring that “existing and new [Green Belt] boundaries are durable beyond the</li> </ul>



Sub Issues	Officer response
	<p>duration of the plan period.</p> <ul style="list-style-type: none"> <li>Fewest impacts on number of residents. It is considered that development which is the most sustainable should be pursued, the impacts on residents are considered by assessing the various aspects of sustainability.</li> </ul>
<p>Why is east of Redditch ignored? Employment land is mostly on the east side. It would make sense to build where people live, if you believe businesses will set up in Redditch</p>	<p>The east of Redditch hasn't been ignored. Areas 15, 16, 17, 18, 19, 20 and 10 (HGDS, page 16, map 1) are situated on the eastern side of Redditch and although some of Redditch employment is located on this side of the Town they were discounted at the Broad Area Appraisal stage.</p>
<p>Why is there only one location proposed by Redditch and Bromsgrove when other sites deemed by your planning department to be more suitable?</p> <p>If Bromsgrove have to supply the land it could be spread across several sites. Why isn't it proposed to share these allocations around the Bromsgrove/Redditch border?</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations. Full details of why these sites were chosen can be found in the Housing Growth Development Study.</p>
<p>Why have areas such as Bradley Green, Callow Hill, Feckenham been ignored?</p>	<p>Callow Hill was considered as part of areas 2 and 3 of the study and discounted. Stand alone settlements in the rural south were considered to be unsustainable.</p>
<p>Development in Studley area which could give Redditch better transport link North and East as well as providing that community with the reopening of the fire station, full utilisation of the High School with Warwickshire children, a combined interest in the future of the Alexandra hospital, more high quality housing in Studley, etc.</p>	<p>This area was discounted in the HGDS pg 48-49 due to significant green belt and environmental considerations including coalescence of settlements and significant flooding issues.</p>
<p>Consider developing in Catshill area and the west side with suitable motorway screening and perhaps a new motorway junction on the Kidderminster road.</p> <p>Build at Maypole</p> <p>Build at Wychbold</p>	<p>A key concern with these suggestions is that they are poorly located to serve the needs of Redditch in contrast to sites adjacent to the town which were the consideration of the HGDS (Paragraph 5.9). This is also relevant to the suggestion to have a larger number of smaller developments dispersed throughout Bromsgrove.</p> <p>Development is also occurring in surrounding districts to meet the needs of other localities. For example Bromsgrove district has land for</p>

Sub Issues	Officer response
<p>Build at Throckmorton</p> <p>Much of the Redditch' allocation might even be able to be constructed on Bromsgrove land on the edge of Birmingham</p> <p>May be an opportunity to build on Brownfield Sites in Bromsgrove (e.g. the old British Leyland Site). Have these options been investigated and is there any reason why development must be on the fringe of Redditch?</p> <p>A larger number of smaller developments of 100-200 homes - for which you would then need 15-30 could be accommodated by extending villages and smaller communities across the Bromsgrove and identify one/possibly two sites for a mini-new town</p> <p>Move it to a more appropriate and fitting area where it lends itself to a new development of such a size</p> <p>With regard to the proposal for the development of 3000 in one place, I refer to David Cameron's comments saying the government didn't want sprawling estates tacked onto villages.</p>	<p>4,500 dwellings to meet its needs to 2022; this includes a development site at Catshill for 80 dwellings. Within Bromsgrove the location of development follows the settlement hierarchy meaning larger settlements receive the highest growth. If development to meet Redditch's need was placed in another location within Bromsgrove or another surrounding district it would result in disproportionate growth of up to 3,000 dwellings in such settlements.</p> <p>It is considered that development adjacent to Birmingham would serve Birmingham's needs rather than Redditch. The British Leyland Site, presumably referring to the Longbridge Works, is part of the Longbridge Area Action Plan which is already undergoing substantial regeneration and is contributing to Birmingham's growth needs by providing new housing.</p> <p>The HGDS has considered reasonable alternatives to the proposed sites and the study considered that site 1 and site 2 are acceptable for housing development as they are the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p> <p>The proposed policy suggests two sites to take the 3,400 with the larger site 1 taking a minimum of 2,800 dwellings. The concern of sprawl is noted and credence was given to this issue as part of the HGDS in terms of proposing Green Belt boundaries.</p>
<p>If a small-scale, focussed approach was applied to 20 areas around Redditch, within the smaller 'pockets', development could be identified meeting criteria for sustainability etc. This would spread the 'load' and impact to existing areas all around the borough, enabling more organic growth and infrastructure. Encourage small-scale development all round the town's margins and small-scale and innovative building enterprises. More people can live close to the town, enjoying access to facilities there and be within easy distance of the countryside. To drop whole, new, artificial 'communities' in one or two large areas ruins irrevocably the environment and distorts the</p>	<p>All 20 areas around Redditch were considered and assessed to ascertain their suitability to incorporate Redditch Housing Growth. A number of areas were discounted at the Broad Area Appraisal stage for various reasons including harm to Green Belt and other constraints leading to them not performing well in terms of sustainability and leading to the conclusion of being discounted.</p> <p>The advantages of spreading Redditch housing growth across a number of sites was considered within the HGDS (paragraph 8.12). It is clear from the Sustainability Appraisal carried out that Area's 8, 11</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>natural process of urban growth.</p> <p>Build several smaller areas in Bordesley, Brockhill// Weights Lane, Dagnell End Lane, Icknield St towards Church Hill. Would cause less intrusion and upset, be evenly spread. Plus Infrastructure costs will be tremendously lower.</p> <p>May wish to consider breaking up the sites across 4 sites for example to allow for better social integration and early delivery of much needed housing</p> <p>The advantage of a small number of houses in each of the areas would give no sudden rise in infrastructure needs and allow for small expansion of existing facilities as needed.</p> <p>The benefit of multi-site use is that, if the number of dwellings projected to be necessary was proved during the plan period to be over-generous, development could be phased on chosen smaller sites without committing a single large site to planning blight.</p> <p>Build specialised housing for the growing older population. Has less environmental impact and releases family homes that are needed</p>	<p>and 5 do not perform as well as Site 1 and 2. It is considered that the most sustainable sites have been chosen.</p> <p>It is agreed that artificial communities should be avoided with a view to encouraging a vibrant community. The proposed policy suggests that <i>“All development must be of a high quality design and locally distinctive to its surrounding rural and urban character, contribute to the areas identity and create a coherent sense of place.”</i></p> <p>The requirement for 3,400 dwellings is likely to have a cumulative impact on Redditch infrastructure even if dispersed around Redditch.</p> <p>Phasing of development sites will ensure that housing is built over the plan period. With the two cross boundary sites included Redditch has adequate land for its housing needs for 2030. In examining the 20 sites around Redditch a whole host of issues were considered including impact on environment and issues with encroachment into the countryside which could lead to blight.</p>
<p>Move recreational green spaces to the edges of Redditch and accept that it has a higher than average proportion of green spaces within the urban boundary</p> <p>The municipal 9 hole golf course in Plymouth Road is relocated to Site 1 and the course is redeveloped for housing; excellent access, proximity to town centre, rail and bus travel. Site is roughly equivalent in area to Site 2 or Crumpfields Lane Plan No.4. A Municipal Golf Course on Site 1 retains Green Belt and reinforces separation between Bromsgrove &amp; Redditch.</p> <p>Brownfield development</p>	<p>Housing for the elderly can have the same level of environmental impact as other housing. However the need for this type of housing is covered elsewhere in the two Councils' emerging plans.</p> <p>It is considered that the Green spaces within Redditch perform a vital function of the Town's Green Infrastructure and encourage healthy lifestyles within the Town. Moving these assets in place of housing is not considered a suitable option.</p> <p>The golf course contributes to Redditch's sports and leisure provision in a sustainable central location, it also has substantial constraints in terms of tree coverage and a Local Wildlife Site designation, and as such it is considered inappropriate to develop.</p>
	<p>All of the brownfield land that is capable of being developed to meet</p>

<b>Sub Issues</b>	<b>Officer response</b>
	<p>Redditch's housing need is detailed in Redditch's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>There are still some brownfield sites in Redditch that are available for development, however due to other factors they may not be capable of coming forward for development soon (in the next five years).</p> <p>The SHLAA identifies brownfield sites for around 266 dwellings and a further 205 estimated of brown/greenfield mixed sites. This equates to about 525 dwellings on brownfield land for the Plan period (2011-2030), which will equate to 8.2% of the total strategic housing requirements.</p> <p>During the last Plan period (1996-2011) 51.3% of completions were on brownfield land – this exceeded the Structure Plan target of 25%. So far, during the current Plan period (2011-2030) 86% (54 dwellings) have been completed on brownfield land.</p>
Brownfield development in the Green Belt in addition to smaller scale periphery sites	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt; there is no brownfield Green Belt land in either of these locations. Brownfield land within the Green Belt can perform Green Belt functions equally as well as greenfield land. Brownfield land is also assessed against the same Green Belt criteria as greenfield land. This approach will be followed if or when future Green Belt reviews need to be undertaken.</p>
Redditch needs economic investment to sustain jobs and underpin housing demand.	<p>Agreed. Alongside proposed housing development Redditch Borough Council is making provision for 55 hectares of land which is available for employment use for the period up to 2030. The sites identified in the Employment Land Review are capable of meeting a range business needs, and present a balanced portfolio of available sites. It includes the Eastern Gateway initiative, which incorporates land within both Bromsgrove and Stratford-on-Avon Districts and office provision within some of Redditch's Strategic Sites.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>The full extent of Area 18 includes a significantly larger tranche up to the A435. Should be considered suitable for additional residential development.</p>	<p>The HGDS (Paragraph 5.15) states that “A review of the A435 and adjoining land also concludes that development potential exists on land in the A435 corridor both within Redditch and Stratford on Avon District”</p>
<p>Winyates Green Triangle land is more suitable for residential development.</p>	<p>Disagree. The Winyates Green Triangle is considered more suited to employment land especially as it will form part of the Redditch Eastern Gateway. This location has also been identified as an Economic Game changer by Worcestershire County Council.</p>
<p>Area 14 would infill land between the settlements of Redditch and Studley.</p>	<p>This area is not considered appropriate for development in the HGDS as the area “has the important Green Belt function of preventing the settlements of Studley and Redditch from merging” (Paragraph 5.177).</p>
<p>Areas 9 and 10 lie adjacent to each other. The south-western section of Area 9 and western section of Area 10, both with access to Ravensbank Drive, would be suitable residential development. It would enhance local facilities at Church Hill and Beoley and could be designed sensitively.</p>	<p>These areas were not considered suitable due to coalescence of Beoley and Redditch and the likely significant harm to the Conservation Area and associated Listed Buildings. In addition to this, ‘The Mount’ Scheduled Ancient Monument is located in the western part of Area 10 which is an added constraint (HGDS Paragraphs 5.116 and 5.129).</p>
<p>Area 1 and 2 together has opportunities to enhance local services and facilities. Green Belt harm minimised as there would be a gap to Feckenham. An area this size could sustain public transport so can overcome this concern.</p>	<p>These areas were not considered suitable due to significant Green Belt harm, in terms of leading to coalescence with Astwood Bank, and lack of close and easy access to Redditch Town Centre (HGDS for Area 1 Paragraph 5.29, for Area 2 Paragraph 5.43 and for Area 12 Paragraphs 5.145 and 5.149).</p>
<p>Strong objections to the development of the entirety of either of Area 1 or Area 12 as they would remove the strategic gap between Redditch and Astwood Bank, but we consider that that: A few hundred houses might be accommodated on the fringes of the town between Evesham Road and the Slough. We appreciate that this is mostly in the Warwickshire parish of Sambourne, and thus strictly outside the scope of the consultation. Similarly a few hundred might be located immediately south of Dagtail Lane. We appreciate that there is no obvious strong boundary in this case.</p>	
<p>Encourage modification of existing run-down Council owned properties in Matchborough, Winyates, Oakenshaw, Church Hill etc. to 1B/2P &amp; 2B/3P flats to reduce the need for new affordable</p>	<p>An initiative such as this would not necessarily require specific planning policy and could come forward via the Housing Strategy Team. Whilst this suggestion presents a credible option for increasing</p>

Sub Issues	Officer response
<p>housing.</p>	<p>the affordable housing stock, it is unlikely that the full objectively assessed affordable housing need will be met based on the housing requirement of 6400 dwellings. This situation will not therefore offer opportunity to reduce the housing requirement.</p> <p>Redevelopment of the former New Town District Centres (Local Plan policy 33) offers the opportunity to increase the affordable housing provision, as has been demonstrated through the recently approved planning application for Church Hill District Centre.</p>
<p>Bromsgrove need to consider more manageable tranches of housing – using existing resources. In planning terms, traffic will be accommodated better by being distributed around the network rather than in one development location (which needs a lot of capital).</p>	<p>Bromsgrove and Redditch authorities have worked together to identify the most sustainable location for housing development to meet Redditch's Needs.</p> <p>Worcestershire County Council (WCC) have completed transport assessments which recommend the highway improvements that are needed to support the two sites for development (with an understanding that all of the proposed development sites within Redditch and within Bromsgrove also come forward during the plan periods).</p> <p>There is a need for highway improvements to support the two proposed cross boundary sites if they are to be developed sustainably. The highway improvements needed are detailed in the supporting evidence base.</p> <p>Highway improvements will be predominately paid for by the developers.</p>
<p>Build in Arrow Valley (which drains by gravity)</p>	<p>Development within the Arrow Valley was ruled out at an early stage within the HGDS as “it forms an important part of Redditch’s sports and recreation provision” (Paragraph 5.13). In addition the area contains important ecological and historical designations.</p>
<p>A new settlement away from Redditch would meet housing needs whilst avoiding coalescence</p> <p>Dovehousefield farm at Hunnington as a new settlement. It has</p>	<p>A new settlement was considered as a possible option to meet or contribute towards meeting Redditch’s housing needs to 2030. The HGDS concluded that this was not be the most effective way of delivering sustainable development not least because the area would</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>strong defensible boundaries and avoids coalescence plus there is infrastructure in place</p> <p>Dismissal of area 10 at an early stage before viability testing is unfortunate. It may reveal the need for smaller, easier sites to accommodate the housing shortfall.</p>	<p>be poorly located to serve the needs of Redditch. In addition the proposed sites 1 and 2 avoid any coalescence between settlements.</p> <p>The Broad Area Appraisal considered all 20 areas around Redditch and looked at the various constraints to development. It was considered that “development in parts of this area [10] would mean that Beoley would merge into Redditch and cause significant harm to the Conservation Area and associated Listed Buildings” (HGDS, Paragraph 5.129).</p>
<p>Study too quickly dismissed land south of Redditch in Area 12, where there is considerable frontage development on the north side of the Slough in Stratford. Additional land could be allocated on this north side of the Slough without detriment to the broader Green Belt around Redditch. Such release would have only limited impacts on landscape, agricultural land, and Green Belt. A number of parcels of land are suitable, available and deliverable in the short and medium term within the plan period in Area 12 including Rough Hill Rare Breeds.</p>	<p>The HGDS noted that on the north side of The Slough is a SSSI and any development in this location could be detrimental to this asset. In addition development on this site has the potential for coalescence with Astwood Bank (HGDS, Paragraph 5.153).</p>
<p>The western segment of area 4 which contains land owned by my Clients should be included in land to be allocated for future residential development. The analysis in the Housing Growth Study too easily dismissed this western segment without proper analysis of its characteristics. It would provide both defensible boundaries to the Green Belt but also help protect important woodland. There would be no less encroachment into the countryside than any other land being currently designated. The land at Twin Oaks, Curr Lane is suitable, available and deliverable.</p>	<p>The Western Segment of area 4 is not required to contribute towards Redditch Housing Needs to 2030. The Western segment is more remote than the areas being proposed for development. It is noted that “any development on this section represents development beyond strong boundaries in particularly Gypsy Lane, meaning there would be an element of encroachment into the countryside” (HGDS, Paragraph 6.1.64).</p>
<p>Understand that Birmingham City Council, own substantial tracts of land within the Maypole area (south of the city, adjacent to the A435), which they have requested Bromsgrove DC that they wish to build upon. Bromsgrove DC should assist Birmingham in meeting its own and Redditch BC’s targets, by building there.</p>	<p>Bromsgrove District Council is also aware that Birmingham City Council may require assistance in achieving their housing target. The amount of development required is not yet known. It is therefore considered that cross-boundary growth in relation to Birmingham can be addressed through the full Green Belt Review proposed within Bromsgrove’s emerging District Plan.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Parcels of land at Longbridge, Kings Norton and Druids Heath areas are ripe for development, which could realise approximately 2,000 to 3,000 new dwellings.</p>	<p>Land is currently coming forward for Housing in Longbridge as identified within the Longbridge Area Action Plan. The locations mentioned are potentially more suited to contribute to Bromsgrove or Birmingham's housing needs.</p>
<p>Note Redditch's desire to maintain its unique structure incorporating a high proportion of green space, reflecting its New Town Master Plan but the gross land take-up of peripheral development will be significantly higher than would otherwise be the case</p>	<p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p>
<p>The map attached to the 2010 Redditch Growth Consultation leaflet defines how generous planners are in allocating land as open space and parkland within Redditch. Can recognise a conflict of ideologies – New Town Planning versus Green Belt provision - which has been resolved by Redditch discounting development in the town's green spaces and choosing instead to encroach into the surrounding Green Belt.</p>	<p>The open spaces within the urban area of Redditch are a legacy of the New Town design and as such incorporate important historic features and environmental designations. In addition, they provide opportunities for recreation.</p>
<p>Suggest that sites within the Redditch bowl should be preferred options since they would complement the present housing areas and the impact of urban sprawl would be limited.</p>	<p>For each area analysis in the HGDS topography has been taken into account and informed the outcomes.</p>
<p>Area 7 - The arc of housing development to the south of Dagnell End Road sits oddly within the urban landscape. There is potential housing capacity in the fields south of Dagnell End Road, between the Abbey Golf Course and the A441, which would link physically and socially with the rest of Redditch. Would not expect provision of supportive infrastructure to cause problems. Similarly there are sites to the east of the area above the Arrow Flood Plain e.g. Paper Mill Hill, which may be suitable for development thus minimising the loss of the Green Belt.</p>	<p>Both Dagnell End Road and Paper Mill Hill were essentially covered within Area 7 on page 18 of HGDS. This area forms part of the northern section of the Arrow Valley Park and Abbey Park Golf Course which forms an important part of Redditch's open space provision.</p> <p>In addition to this there are a number of constraints not least the SSSI on Dagnell End Meadow, Local Wildlife Sites, two Scheduled Ancient Monuments and flood risk from the River Arrow.</p>
<p>Area 7 includes important wildlife and heritage assets, but its questioned whether the whole area must be excluded and whether a modest amount of housing capacity might not be found by nibbling at its edges. There are a few fields between the Abbey golf course, A441, and Dagnell End Road (B4101), which might be made</p>	



Sub Issues	Officer response
<p>available. Similarly Paper Mill Hill is above the Arrow floodplain and potentially suitable for development.</p> <p>Area 18 and land between it and A435 - The southern part adjoins an industrial area, and would be best used for that, but the rest adjoining residential areas ought to be suitable for housing. Since it provides a north-south link from Evesham and Alcester to M42 J3, the construction of relief bypass road is a desirable object, particularly since the continuation roads further north and south have already been improved, leaving a gap in the strategic highway network. Nevertheless, it ought to be possible to provide a rather narrower highway reservation and release much of the residue for housing.</p>	<p>The HGDS states that the area is considered suitable, available and capable of delivering housing and employment within the plan period up to 2030. The area falls within Redditch Borough and Stratford-on-Avon District, following a review of the A435 corridor sites within it feature in the Redditch SHLAA and ELR.</p>
<p>Wholesale development of Area 3 would have a significant landscape impact in terms of its effect on the countryside to the west. Nevertheless, opportunities exist for developing land adjacent to the Webheath ADR, particularly at Crumpfields to round this off where it currently has a jagged end.</p>	<p>The HGDS comments upon the rising topography of the area and also highlights some constraints to development that mean wholesale development of the area would be inappropriate.</p>
<p>The possibility of a small urban extension to the village of Astwood Bank does not even seem to have been considered. The possibility of building a hundred or two houses as urban extensions to that village ought to have been considered.</p>	<p>The scale of housing required to meet Redditch's needs to 2030 cannot be met around Astwood Bank. The HGDS raises some concerns with development in areas 1, 2 and 13 which are adjacent to the settlement at Astwood Bank as it could lead to coalescence with Studley, Sambourne and Redditch and to some extent Feckenham on the western side.</p>
<p>Northern edge of Redditch to the immediate north of Dagnell End Road, and to the west of Icknield Street within Bromsgrove District. It measures 57Ha and would deliver some 1000 dwellings net (Site details attached)</p> <p>Dagnell End Brook can be protected in terms of biodiversity and Flood risk as can be located outside Flood Zone 3. Site no more ecologically sensitive than 4 or 6 (report attached).</p> <p>Non-car forms of transport require enhancement here like areas4 and 6. Newly re-built Church Hill centre would be accessible via</p>	<p>A number of different scenarios for development were considered including development within area 8.</p> <p>The HGDS (Paragraph 10.2) states that <i>"No area is perfect or ideal. The choice that has to be made therefore is on the basis of the area(s) which most sustainably deliver the required infrastructure with the least negative impacts."</i></p> <p>It was considered that on balance Area 8 has insufficient capacity to meet the unmet housing needs of Redditch and even combined with Area 6 there is still a short fall.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>improved links. A local centre within the scheme would further enhance sustainability.</p> <p>None of the green belt concerns apply to this site more strongly than areas 4 and 6.</p> <p>Para 6.4.87 notes that “some parts of the area like the south east part of the brook could be considered more suitable for development, however this alone would not provide the required housing to meet Redditch needs”. This is a reference to our client’s land, and it accepts that it could be appropriate for development. Given that the HGDS and SA themselves accept that development needs cannot be met by a single site. To discount this part of Area 8 on the grounds that it would not meet housing needs alone is perverse.</p> <p>The scrap yard referred to is included within the development area. Green belt purposes and green belt amenity would be well served by its redevelopment. Dagnell End Road need not be sacrosanct as the Green Belt boundary. Report attached shows development can be successfully integrated including creation of outer boundary.</p>	

KEY ISSUE: Cross boundary Policy – support

<b>Sub Issues</b>	<b>Officer response</b>
<p>Support policy in general as requirement for further housing development is recognised. Consider that locations in the policy need reconsidering.</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>Policy presents a rational approach</p>	<p>Noted</p>
<p>Support 40% affordable housing target as this will place urban extensions in good stead for meeting affordable housing need. A full mix of affordable house sizes, types and tenures, responsive to local needs as indicated in the most up to date evidence (including SHMA), should be delivered. Expect more detailed policies to follow</p>	<p>Noted</p>

<p>in the Bromsgrove Local Plan.</p> <p>A split of 70% social rented and 30% shared ownership, close to the 'Mix 1' and 'Mix 2' scenarios tested in the Viability Study, is supported by bdht and should be investigated further.</p>	<p>This is noted and can be negotiated for, However the SHMA takes account of type and tenure mix over a five year period and is reviewed accordingly to meet current needs, by referencing any current requirement for type and tenure, it could render the policy out of date by the time later phases of the proposed sites come to be developed.</p>
<p>Support the promotion of developing community facilities</p> <p>Note second to last bullet point of Policy picks up flood risk and refers to measures to improve local water environment, which we support. Further detail could clarify this requirement.</p> <p>Policy appears broadly acceptable - Lay out a requirement for 40% GI in major allocations. This would accord with best practice and emerging policy in South Worcestershire and would give a helpful benchmark for development master planners.</p>	<p>Noted</p> <p>Adequate reference to flood risk is made within the policy, this would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p> <p>This would come in advance of Bromsgrove and Redditch completing GI strategies for their areas which would not be appropriate. The emerging policy for BDC will aim to deliver a high quality multi-functional green infrastructure network by:</p> <ol style="list-style-type: none"> <li>1) ensuring developments adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure, with priorities determined by local circumstances and;</li> <li>2) requiring development to have regard to and contribute towards the Worcestershire Green Infrastructure Framework, the emerging Worcestershire Green Infrastructure Strategy and where available, the concept plans.</li> </ol>
<p>English Heritage welcomes emphasis on importance of integrating new development with existing built edge and surrounding rural areas. The latter will form the new settlement edge and warrants careful consideration. Suggest a strategy and management plan for GI refers to heritage assets in addition to biodiversity benefits. This reflects the multi-functional basis of GI and an integrated approach to masterplanning needs. This is consistent with Worcestershire County Council's GI Framework.</p>	<p>Noted, In undertaking GI work, the historic environment character zones and the sites heritage assets are considered and constraints for biodiversity will feed into the strategy for GI so that biodiversity gains can be achieved.</p>

KEY ISSUE: Cross boundary Policy – Objections

<p><b>Sub Issues</b></p> <p>Disagree with the policy due to locations chosen for development</p>	<p><b>Officer response</b></p> <p>20 different sites were considered around the periphery of Redditch.</p>
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<b>Sub Issues</b>	<b>Officer response</b>
<p>Enormous increase in housing proposed and rise in population cannot be sustained in the Foxlydiat area. The policy is questionable since it's too extensive for Foxlydiat</p>	<p>After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p> <p>The increase in population and resulting housing requirements are identified in the Strategic Housing Market Assessment and are Redditch's objectively assessed needs.</p>
<p>Policy contains massive requirements that are unlikely to materialise because of current/future national economic difficulties. Bound to be affected and handicapped by financial constraints.</p>	<p>The increase in population and resulting housing requirements are identified in the Strategic Housing Market Assessment and represent Redditch's objectively assessed needs. The housing requirement covers a twenty year period. It is expected that during this time, the housing market will experience both peaks and troughs in delivery rates, as has been the case during previous Plan periods. The promoters of development sites have indicated positive delivery trajectories. Therefore concerns regarding delivery of the numbers of houses on these sites are limited.</p> <p>Furthermore, annual monitoring of housing delivery would present an opportunity to assess delivery rates and changing circumstances. If the need arose, then early review of the Plan could be undertaken, as advocated in the NPPF (para 153).</p>
<p>This has been put forward by Bromsgrove District Council and is a flawed policy being enforced upon the Borough Council</p>	<p>This is not the case, the HGDS was prepared by both Bromsgrove and Redditch and the consultation was also approved by both Councils</p>
<p>What safeguards are there to ensure the laudable aims of the final policy paragraph (high-quality development, locally distinctive, contribution to local identity etc.) are implemented in the final product?</p>	<p>This is the policy which any final proposals would need to have to comply with in order to be granted planning consent.</p>
<p>Policy is confusing Development at Site 1 wouldn't create a balanced community integrated with Redditch and would not be 'sympathetic' to the surrounding rural areas of Bromsgrove.</p>	<p>It is not clear what aspect of the policy is confusing. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. The policy requires that the development creates a balanced community that</p>

Sub Issues	Officer response
	integrates into the existing residential areas of Redditch, and any final proposals would need to have to comply with in order to be granted planning consent.
Requirements in para 2 is lacking detail. Issues such as percentage of affordable housing, public transport provision, etc. might be better in a list of developer obligations to be sought. Include references to highway requirements, contributions to education, greenspace provision, and leisure contributions.	Specific infrastructure requirements will be included within the Bromsgrove and Redditch Infrastructure Delivery Plans. The planning policy will refer to the provision levels required on the site.
Matters such as design quality, biodiversity, etc would expect to apply to all developments across the Districts and should therefore be enshrined in the Local Plan principles	Developments on any proposed sites would need to take account of the policies within Bromsgrove's District Plan as well as this policy.
Schools not needed as there are unused school places in Redditch.	The WCC education department has indicated that the developments proposed on sites 1 and 2 would require the provision of two new first schools and contributions towards other schools.
Questions rationale for 40% affordable housing. Redditch Borough requirement based on assessment of need and viability considerations is a reduced level of 30%. Infrastructure requirements of large scale urban extensions are significant and cannot allow delivery at rate higher than that expected on adjoining land. 30% more appropriate and consistent.	This requirement relates to the evidenced viability of delivering affordable housing on greenfield land in Bromsgrove. The policy is flexible enough by including reference to 'up to' a 40% requirement.
Requirement for 40% affordable housing is confusing as Policy 6 Affordable Housing of Draft Borough of Redditch Local Plan No.4 only specifies 30% affordable housing provision on sites of more than 10 dwellings.	
What if a policy within Bromsgrove Local Plan contradicts, or contravenes a policy on Redditch Local Plan No.4? The impact of policies is more likely to directly affect Redditch due to proximity. No management structure or plan is in place to deal with such instances. Bromsgrove and Redditch Consultation is developed to ensure new homes, jobs and services are developed with supporting transportation infrastructure, yet policy doesn't mention potential impact upon level crossings by developments (e.g. new dwellings or businesses). Level crossings can be impacted in a variety of ways by	The policy to deliver this development has and will be jointly prepared by both Councils to ensure that it can successfully deliver the development without conflicting with other development plan policies for Redditch and Bromsgrove.  There are no level crossings in Redditch or in close proximity to the two proposed sites.

Sub Issues	Officer response
<p>planning proposals:</p> <ul style="list-style-type: none"> <li>• By a proposal being directly next to a level crossing</li> <li>• By the cumulative effect of developments added over time</li> <li>• By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route</li> <li>• By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway</li> <li>• By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads</li> <li>• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</li> <li>• By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing</li> <li>• By any development that alters a primarily agricultural use level crossing to residential usage (e.g. from use by a farmer to proposed use by a residential development).</li> </ul>	
<p>As consultation on Housing Growth supports railway improvements, there should be support to removal of level crossings (Moors Gorse is effectively closed already once the footbridge is constructed).</p>	<p>Moors Gorse is not within or close to the two Districts so this comment also does not apply.</p>
<p>We request that the policy confirms that: Bromsgrove Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town &amp; Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway;</p>	<p>The statutory responsibility is noted; as it is covered in legislation it is considered unnecessary to include this within the policy itself.</p>
<p>As a first principle, Network Rail would seek to close Level Crossings where possible;</p>	<p>There are no level crossings near to the two proposed sites so reference is not necessary</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; and</p> <p>The developer is required to fund any qualitative improvements required to the level crossing identified as a direct result of the development proposed.</p>	<p>There are no level crossings near to the two proposed sites so reference is not necessary</p> <p>There are no level crossings near to the two proposed sites so reference is not necessary</p>
<p>To ensure developer contributions deliver improvements to the rail network, recommend that the Consultation include provisions for rail. Policy should include the following:</p> <p>A requirement for developer contributions to deliver improvements to the rail network, including any development that occurs as a consequence of the Bromsgrove and Redditch Consultation on Housing Growth. A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. To be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.</p>	<p>Network Rail have advised on local level schemes that are being progressed - new Station at Bromsgrove, Alvechurch additional platform and Wythall car parking. No major enhancement projects have been submitted to the Council to seek contributions.</p>
<p>Expect permeable paving, swales and filter drains necessary in all large developments to avoid discharge into foul sewer network which could increase the volume and frequency of flooding and adverse effects on natural/social environment.</p>	<p>Adequate reference to SUDS is made within the policy, this would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p>
<p>The requirement for Green Infrastructure and SUDs and on Site 2 "to avoid development on high slopes" (Paragraph 10.4 page 224 of Housing Growth Development Study) means these sites may not achieve the number of dwellings envisaged. Refer to 'Viability Testing Local Plans Advice for Housing Delivery Practitioners –</p>	<p>The on-site requirements have been considered in determining the capacity for housing and employment across site 2 and the adjoining Brockhill Strategic Site.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Local Housing Delivery Group' chaired by Sir John Harman (June 2012). The Harman Report states "One error that has a very large impact on the outcome of viability testing is overlooking the distinction between the gross site area and the net developable area. The net area can account for less than half of the site to be acquired (that is, the size of the site with planning permission) once you take into account on-site requirements such as formal and informal open space, sustainable urban drainage systems, community facilities and strategic on site infrastructure etc. On larger sites, sometimes the net area can be as little as 30%".</p> <p>Policy not sound within the meaning of the NPPF. Not disputing the Policy has been positively prepared insofar as the Councils are working jointly to meet development needs of Redditch, do not consider it is justified, effective or consistent with national policy.</p> <p>Broaden flexibility of Policy by including one or more reserve cross-boundary sites. Policy and criteria would apply to them. Policy would set out circumstances when reserve sites can be brought forward, as a result of lack of delivery of allocated sites. This process could occur without a review of the Local Plan</p>	<p>There are no specific reasons provided by the respondent as to why the policy is not justified, effective or consistent with national policy</p>
<p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>	<p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p>

KEY ISSUE: Cross boundary Policy – suggested changes

<b>Sub Issues</b>	<b>Officer response</b>
<p>Could have tried to slowly develop smaller areas before looking at devastating a massive greenbelt area.</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>Sustainable transport: the developers to fund the provision, upgrade to existing facilities and signposting and maintenance of cycle route 5 across Redditch for a minimum of 10 years following commencement of development at the site.</p> <p>Sustainable transport: developers to fund or support the provision of additional bus services to the development for a period of 10 years following the completion of sale of the first property at the development</p> <p>Water management: developers to fund the provision, maintenance and management of all water handling at the development in perpetuity. This to include: the handling of run-off water, maintenance and protection of existing water courses and any flora and fauna therein.</p> <p>Vehicular access: developers to fund and maintain the improvement of the roadways within the development, and connecting the development to wider Redditch in such a way that: walking and cycling is promoted by the provision of “dutch-style” protected combined cycle and walking routes alongside the roadways. This for a minimum of 10 years following the commencement of development.</p> <p>Countryside access: developers to fund the preservation and maintenance of existing footpaths and ancient routes (e.g. the Monarch’s Way) for a period of 10 years following the commencement of development at the site.</p> <p>Water treatment: given the requirement to pump sewage water 7.5 kms to Spenal Ash, all properties to be built with roof top solar panels installed in order to offset the energy requirements of the sewage pumping operation</p> <p>Seek to provide ‘church space’ within the new shared community</p>	<p>most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p> <p>The Councils are currently preparing Infrastructure Delivery Plans (IDPs) which will identify all types of infrastructure needed to support development. The IDPs will, in turn, inform the level of developer contributions sought for infrastructure (and, where applicable, for future maintenance). It should be noted that some infrastructure is provided directly by the developer, some via developer contributions and some is provided directly by the infrastructure provider.</p>
<p>Adequate reference to renewables and technologies is made within policies elsewhere in the Bromsgrove District Plan and to repeat these would be too onerous.</p>	<p>Unless a provider or scheme is likely to or requests to be incorporated</p>

Sub Issues	Officer response
<p>facilities</p> <p>Suggest considerable work needed to investigate suitability of all sites considered to establish their deliverability and viability. If developers have options on various sites its not unreasonable to expect initial surveys on ecology, utility provision, public transport provision, etc. These would have to be considered by developers in preparing Environmental Impact Assessments at a later stage.</p>	<p>within the development it is not feasible to set aside land or property for this purpose.</p> <p>There will be work on viability and further evidence to support Sites in advance of the pre-submission versions being published</p>
<p>Might be useful for Members to consider the relative merits of allocating one or two large developments or allocating smaller housing numbers to a greater number of sites.</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>Includes a reference to the need for development to ensure sufficient capacity of sewerage systems for wastewater collection and treatment is provided. The housing study (paragraph 9.3, page 221) site appraisals acknowledge constraints to the existing foul infrastructure network as a key component in delivery timescales and phasing. However, this is not reflected in the policy, there is no reference to phasing of development informed by infrastructure requirements.</p>	<p>STWL are providing the Councils with more information on likely costs and timescales for a range of scenarios and this will inform the development of the policy</p> <p><b>ACTION: Review contents of STWL additional information for policy additions.</b></p>

Sub Issues	Officer response
<p>Principles and recommendations of the Level 2 SFRA should be reflected in policy recommendations and requirements for each preferred site, with a commitment to confirming developable areas</p> <p>Would expect hydraulic modelling of watercourses to be undertaken in clarifying the Flood Zone extents</p> <p>Ensure any development does not increase flood risk elsewhere by increasing surface water run-off rates/volumes from the site post development (or during construction). A surface water drainage strategy should be produced for each development site</p> <p>Opportunities for flood risk betterment should be considered.</p> <p>Make it clear that all built development should be located outside the floodplain and a suitable buffer strip provided adjacent to watercourses.</p>	<p>Site specific flood risk assessments are being completed for these sites as the Level 2 SFRA did not consider these sites because they were analysed following the completion of the SFRA. Any relevant policy concerns from the site specific FRAs will be included</p> <p><b>ACTION: Review contents of SFRA for policy additions.</b></p>
<p>Improvements to the water environment should include biodiversity and water quality requirements, linked to the WFD objectives and green infrastructure section of the policy.</p>	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure and this would include potential for enhancements to blue infrastructure.</p>
<p>Reference SuDS as a requirement of the policy, which should be designed with an appropriate level of treatment to protect the water environment</p>	<p>This is already a requirement within the policy</p>
<p>Advise that North Worcestershire Water Management Team are consulted on the draft policy wording, in considering opportunities to improve any local known flooding issues, through development in these areas.</p>	<p>North Worcestershire Water Management Team has been added to the LDF database.</p>
<p>A historic landfill site (Hawthorne Pit, Cur Lane, Bartles Wood, Foxlydiate) is within this area, which accepted waste from 1980–1982. Development in this part would need appropriate site investigation and remediation prior to development. An appropriate contaminated land desk study/risk assessment would need to be submitted, as a minimum.</p>	<p>Presume respondent is referring to Site 1.</p> <p><b>ACTION:</b> Include reference to site investigation for contaminated land for both sites</p>
<p>Although the draft policy refers to improving the local water</p>	<p>Agreed, the groundwater protection principles will be incorporated into</p>

Sub Issues	Officer response
<p>environment, include a specific reference to groundwater quality and contaminated land. This is particularly important for Site 1. Recommend as an additional bullet point. Include requirement to consider sensitivity and potential risk to the water environment (including groundwater vulnerability), and to carefully design development (i.e. layout and any associated infrastructure), with appropriate mitigation to protect and enhance the water environment. Contaminated land assessments should be submitted to sufficiently characterise the risk, including site investigation where necessary. Proposals must undertake appropriate remediation measures and verification works where contamination issues are present.</p>	<p>the Policy as appropriate.</p> <p><b>ACTION: incorporate principles into the Policy as appropriate</b></p>
<p>Careful consideration will need to be given to infiltration SuDS, particularly in groundwater sensitive areas. Where infiltration SuDS are proposed for surface run-off from roads, car parking and public or amenity areas, they should have suitable treatment steps to prevent pollution of ground and surface waters. SuDS can help address existing issues relating to low flows in surface waters and aquifer recharge i.e. by ensuring that natural infiltration rates occur across the development during normal, as well as high rainfall, to maintain base flows.</p>	<p>Adequate reference to SuDS is made within the policy, this would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p>
<p>Reference to the table para 3.38, would like to see the third reference amended (upper case amendments) to "Prominent physical features i.e. Fragmented tree coverage dense woodland, ANCIENT WOODLAND, ANCIENT trees, good and sparse hedgerow growth quality hedgerow growth. This would link with comments in para 3. 16 and reference to ancient woodland in para 3. 17.</p>	<p>The HGDS was completed for consultation purposes and will not be amended following consultation.</p>
<p>Ancient woodland and ancient/veteran trees are an irreplaceable semi natural habitat that does not benefit from full statutory protection: for instance 84% of ancient woodland in the West Midlands has no statutory protection. With only 2.4% of the land area in Great Britain and, for instance, a below average 1.83% of Redditch Borough, covered by ancient woodland, we cannot afford any more of this finite resource to be lost forever in the locality.</p>	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure and this would include evaluating where ancient woodland assets exist and could be protected or enhanced. Emerging BDC policy on the Natural Environment seeks to achieve better management of Bromsgrove's natural environment by expecting developments to protect, restore, enhance and create core areas of high nature</p>

<p><b>Sub Issues</b></p> <p>Government policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The NPPF states “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland” (DCLG, March 2012, para 118). However this NPPF wording should be considered in conjunction with other stronger national policies on ancient woodland. The Government’s policy document ‘Keepers of Time – A statement of Policy for England’s Ancient &amp; Native Woodland’ (Defra/Forestry Commission, 2005, p.10) states: ‘The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland’. The Government’s Independent Panel on Forestry states: ‘Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland Policy (Keepers of Time – A statement of policy for England’s ancient and native woodland)..... Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.’ (Defra, Final Report, July 2012). This has been endorsed by the response in the recent Government Forestry Policy Statement (Defra Jan 2013): ‘We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England’s ancient and native woodland’. The Government’s Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: ‘The Government is committed to providing appropriate protection to ancient woodlands....’. The new Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England’s Wildlife &amp; Ecosystem Services, Defra 2011, see ‘Forestry’</p>	<p><b>Officer response</b></p> <p>conservation value (including nationally and locally protected sites and irreplaceable nature resources such as sites with geological interest, ancient woodlands and habitats of principle importance), wildlife corridors, stepping stones and buffer zones.</p>
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<b>Sub Issues</b>	<b>Officer response</b>
<p>para 2.16) states that – ‘We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site’. The West Midlands Forestry Framework (Growing our future, May 2010, Forestry Commission) Objective EB2 seeks: ‘To prevent any further loss of ancient woodland and to enhance ancient semi-natural woodland and trees with new native woodland planting...’</p> <p>Plan should err on the side of caution by designating a limited amount of land for early development. The target is intended be something like a 20-year land supply. About half of this is provided by urban land supply. Suggest that a considerable part of the area should become Safeguarded Land. The Plan should provide for regular phased release of such land.</p>	<p>Because Redditch would not have a five year supply of land from adoption when using only Redditch Borough sites, some of the parts of sites 1 and 2 would need to delivery houses early on. Indications from both developers are that this is feasible.</p> <p>The preferred option of sites 1 and 2 will provide land for Redditch’s housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>

KEY ISSUE: Biodiversity

<b>Sub Issues</b>	<b>Officer response</b>
<p>Development anywhere will result in the destruction of trees</p>	<p>A Habitats and Species Survey is being completed which includes tree and hedgerow analysis, this would need to be submitted as part of any planning application. The protection of trees will be dealt with through the application process and any removal of trees to enable</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>More work required regarding species and habitats of principle importance prior to development and findings may reduce any developable areas</p>	<p>development will be kept to a minimum. A Habitats and Species Survey is being completed, this would need to be submitted as part of any planning application. This will inform the master planning of the site in order to maximise opportunities for biodiversity and recreation and mitigate the effects of development on biodiversity such as planting to encourage natural foraging, artificial bat roosts etc.</p>
<p>Protection and enhancement of existing features of interest and creation of new and improved links between them will be critical in delivering on-site GI networks, essential if development of any proposed areas is sustainable. Networks of watercourses, trees, hedges and ponds etc. of particular importance and must benefit from careful consideration in final area allocations. With this in mind we are pleased to support bullet points 4 and 5 of the Housing Growth Policy in Appendix 1.</p>	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure.</p>
<p>Generally satisfied that landscape and ecological sensitivities of the preferred sites have been identified and that effects on these from proposed development could be adequately mitigated if provided in accordance with relevant Plan policies.</p>	<p>Noted.</p>

**KEY ISSUE: Green Belt**

<b>Sub Issues</b>	<b>Officer response</b>
<p>If Areas 4,5,6 and 11 were selected this would mean the whole of North Redditch would be a building site for a good number of years and result in the development and destruction of 4 Green Belt areas.</p>	<p>This is not proposed as the preferred approach to meeting housing need.</p>
<p>The SHMA requirement with other evidence has shown that the full 6,400 dwellings required can be met, with the RBC Preferred Options of Areas 4 and 6, so there is no requirement to develop any further Greenbelt sites for the duration of this Plan. I would request that ALL Areas not chosen for development in the Plan and not classed as strategic sites in Local Plan 4, stay as Greenbelt and are not de-regulated in any shape or form i.e. no ADR's etc. Safeguard these Greenbelt Areas for the future of both Redditch and Bromsgrove</p>	<p>The developable areas of Areas 4 and 6 have been identified through the Housing Growth Development Study and are proposed to meet the cross-boundary housing need. All other areas will remain designated as Green Belt and no ADR's are currently proposed to be designated.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>residents.</p> <p>Bromsgrove as a good neighbour ought to help Redditch to overcome some of its needs for Housing, but it should not be at the cost of Bromsgrove's own cherished interests. Under no circumstances should Bromsgrove green belt be touched. Bromsgrove's environmental interests should be the overriding aims and objectives. Therefore, the entire shortfall of 3400 houses should not be considered and met by Bromsgrove.</p>	<p>The cross-boundary growth is for Redditch's needs and for sustainability reasons the development should be close to the boundary of Redditch. All of the areas in Bromsgrove adjacent to the boundary of Redditch are designated as Green Belt, so some Green Belt loss is inevitable in order to accommodate the need. The choice of development locations is based on a wide range of considerations, not just environmental interests. The Duty to Cooperate requires Redditch Borough and Bromsgrove District Councils to work together to find a solution to meet the housing need.</p> <p>There would still be a significant Green Belt gap between Redditch and Bromsgrove. The proposed boundary for Site 1 (which falls within Area 4) has been carefully chosen to limit urban sprawl.</p>
<p>With the development of the Oakalls starting at the A448 and with proposed development of Area 4 this would leave insufficient green belt to define the boundaries of Bromsgrove and Redditch and would start urban sprawl.</p>	<p>The cross-boundary growth is for Redditch's needs and for sustainability reasons the development should be close to the boundary of Redditch. All of the areas in Bromsgrove adjacent to the boundary of Redditch are designated as Green Belt, so some Green Belt loss is inevitable in order to accommodate the need. The two Authorities cannot make provisions in other plans to meet Redditch's growth.</p>
<p>Smaller settlements dotted around the county would impact far less on our green belt.</p> <p>If Green Belt is no longer sacrosanct, how can any boundary (road, railway line, water course or hedge) remain as a barrier to further encroachment in the future?</p>	<p>Green Belt policy has not changed. If there are exceptional circumstances to justify rolling back Green Belt the NPPF suggests that this should be done in order to meet objectively assessed housing requirements.</p> <p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within</p>



Sub Issues	Officer response
	<p>the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
<p>Green belt land is the only barrier to prevent urban sprawl.</p> <p>Too much focus on how to use Green Belt land and not enough on redevelopment.</p>	<p>Noted this is considered in the HGDS</p> <p>Redevelopment and development within Redditch has been considered through the SHLAA. Where redevelopment opportunities exist within the focussed area sites this has been identified.</p>
<p>Potential release of Green Belt land in the 20 areas around Redditch has not been adequately assessed in the same way that the land within Redditch has.</p>	<p>There is a difference in the small scale Green Belt releases within Redditch and the purpose of the HGDS to search for the best site or sites to accommodate a significant amount of Redditch's housing requirements. It is appropriate in these circumstances to have different methodology but they are not inconsistent in the outcomes.</p>
<p>Two years ago, the Draft Core Strategy for Redditch identified the areas under review as Green Belt and the status of the identified sites has not changed; as such, if carried forward, the proposals would represent inappropriate development in Green Belt under current policy.</p>	<p>Green Belt policy has not changed. If there are exceptional circumstances to justify rolling back Green Belt the NPPF suggests that this should be done in order to meet objectively assessed housing requirements.</p>
<p>WPD object to the Council's definition of power lines as "weak boundaries" which are considered by the Council "to be those that are visible but can be easily altered or destroyed" (as set out by Paragraph 3.39). WPD emphasises that strategic overhead power lines are not necessarily 'weak boundaries', which cannot be easily moved or removed. To move or remove strategic power lines may place a financial burden on WPD.</p>	<p>The HGDS does not propose to remove power lines, the reference to weak boundaries is a description of their physical attributes and how well they feature on the ground. Power lines are sometimes diverted underground as a result of development.</p>
<p>Premise of the HGDS is that growth is met around Redditch rather than dispersed which has less Green Belt impact</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>Weak boundaries that need enhancing is at odd with Green Belt policy in the NPPF</p>	<p>Agreed, existing defensible boundaries are always more preferable for defining long term green belt boundaries on a site to provide more certainty going forward. The HGDS looked extensively at proposing</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Supports the principle of having a Green Belt, and of its having defensible boundaries. Nevertheless, the approach to what boundaries constitute defensible boundaries is unsatisfactory. The edge of a wood is clearly a defensible boundary, as is a road. At the other extreme a post and wire fence is clearly an indefensible one. The problem area lies between these. It seems that a low hedge, resulting from regular trimming is treated as a weak boundary, whereas an ill-maintained hedge, where the hedge has been allowed to grow into a row of trees is regarded as a stronger one. There is a fallacy in this: leaving a hedge to grow in an uncontrolled manner for a few years will turn it into a row or trees. The natural growth of trees in that period could easily turn what is now regarded as a weak boundary into a strong one. Conversely, applying a traditional maintenance regime to an overgrown hedge will, in a few years turn it into a much smaller hedge.</p> <p>A ridge of hills is an even more defensible boundary, though at one point the HG document dismisses a ridge as a defensible boundary due to the difficulty of identifying exactly where the boundary should be. In the case of a round-topped hill, there is an element of truth in this. However, a ridge is actually the most robust boundary of all. It will no doubt be desirable to restrict the developable area, so that the roofs of houses will not project above the skyline, but that is an issue of the extent of the developable land, not directly one of precisely where the Green Belt boundary should be placed.</p>	<p>scenarios within these strong boundaries so it achieves this with selecting sites 1 and 2. However where it is not possible to propose green belt boundaries on existing strong boundaries, it is acceptable to enhance weaker boundaries through development and its layout/planting.</p> <p>The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes and strong or weak boundary.</p>
<p>A ridge of hills is an even more defensible boundary, though at one point the HG document dismisses a ridge as a defensible boundary due to the difficulty of identifying exactly where the boundary should be. In the case of a round-topped hill, there is an element of truth in this. However, a ridge is actually the most robust boundary of all. It will no doubt be desirable to restrict the developable area, so that the roofs of houses will not project above the skyline, but that is an issue of the extent of the developable land, not directly one of precisely where the Green Belt boundary should be placed.</p>	<p>The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes and strong or weak boundary.</p>

KEY ISSUE: Housing

<b>Sub Issues</b>	<b>Officer response</b>
<p>Build within the Redditch boundary to satisfy current needs and re-</p>	<p>NPPF requires that the objectively assessed needs are met and are</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>assess future requirements (if they exist) then migration statistics also fluctuate wildly – it is therefore reasonable to presume that housing number requirements will also vary in coming years</p> <p>The suggestion that 3,400 houses are needed by Redditch (as contained in the publicity for the proposed development) is wrong. It is a forecast based on dubious and largely outdated assumptions of demographic and economic growth in the town. Similar projections have been made in earlier years and have fluctuated widely. None of them has come near the miniscule actual growth contained in the consultant's own report.</p>	<p>allocated in a plan for fifteen years</p> <p>The housing requirement for Redditch is set out in the SHMA 2012. The data is informed by the ONS projections which are widely used as standard methodology nationally.</p>
<p>This is a Regional policy, build in other more sustainable locations</p>	<p>This is a plan prepared by the two Local Authorities and is not regional policy. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>if we do need them in Redditch how can we then say they need to be built in Bromsgrove</p>	<p>The requirements for Redditch are in excess of the capacity of the Borough. The cross boundary growth is for Redditch's needs and therefore for sustainability reasons the development should be close to the boundary of Redditch. Based on the target of 6,400 dwellings Redditch does not have a five year housing land supply using land within its own boundaries only. This is because a number of the sites that can form part of portfolio of sites cannot come forward within five years due to other factors such as land ownership issues.</p>
<p>If there is no room how can they be needed?</p>	<p>Capacity and Need are different things. Redditch has limited capacity within its administrative area; however administrative boundaries should not be seen as barriers to meeting need where capacity is limited.</p>
<p>I don't believe this number hasn't been challenged fully</p>	<p>The requirement hasn't been challenged fully; the Public Inquiry will facilitate this opportunity. However, the methodology undertaken to produce the Worcestershire SHMA, follows the DCLG Guidance "Strategic Housing Market Assessments – Practice Guidance" (2007), which sets out a framework that should be followed to develop a good</p>

Sub Issues	Officer response
<p>The country needs affordable housing, not luxury homes on green fields.</p>	<p>understanding of how housing markets operate. It remains the most up-to-date Guidance for undertaking research of this kind. RBC is confident that the methodology it has adopted is appropriate.</p> <p>This is considered in the SHMA which details what affordable housing and market housing is required as well as the size and tenure of housing.</p>
<p>Bromsgrove Council is happy to "dump" its allocation right "in the face" of Redditch residents, well out of sight of its Bromsgrove residents</p> <p>Bromsgrove would of course pass this burden quite readily onto their furthest borders because it will fail to affect them, being so far removed from the proposed development.</p> <p>It is unfair of Redditch Council to agree to take on Bromsgrove's housing allocation at Foxlydiate</p>	<p>This HGDS considers the best sites to meet the objectively assessed needs of Redditch, it does not contribute towards offsetting Bromsgrove housing requirements.</p>
<p>Bromsgrove has its own increasing housing needs. This ought to be the guiding principle.</p> <p>I have no faith that the numbers will stack up when this all plays out in the future and given the migration of people out of the area to find much needed jobs (where will they find them in Redditch?) versus the rising immigrant population (are these the Redditch families that you are building for ?)</p>	<p>Noted, however finding sites to meet Bromsgrove's housing requirements is not the purpose of the HGDS</p> <p>The SHMA recommends a housing requirement based upon a range of factors including migration effects to and from Redditch</p>
<p>If this proposal is agreed will BDC still be required to meet its quota of some 4000 and possibly 7000 homes making a total of at least 7,400 new homes within the boundaries of the BDC?</p> <p>If this is the case then BDC should consider building 6/10 story flats in order to preserve irreplaceable farm land and include all brown field sites. For example the brown field site at the junction of Charfort Road, A38 and Stoke Road would be the ideal location for some 10 story flats as it is within walking distance of Bromsgrove Railway Station, two Supermarkets, two schools, a playing field &amp; bowling ally and opposite to the KFC now being built. While it may currently be</p>	<p>This consultation relates solely to meeting Redditch growth needs. Bromsgrove would still need to meet its requirements separately. It can meet requirements of 4500 new dwellings up to 2023 without any Green Belt release. It is anticipated a Green Belt Review will reveal how and where the remaining needs will be met up to 2030 and beyond.</p> <p>Density issues are an important design consideration when considering proposals for new development. BDC currently adopts the policy stance that new development should in keeping with the character of the area. New housing should be well related in scale and</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>designated as part of the industrial estate I am sure that building some 400 homes on this site would take priority as many industrial building are currently vacant, nor would this site be controversial. When last I suggested that we should be building up and not out to save valuable farming land, I was told by BDC that no one wants to live in flats. If flats are of the standard of those built at the junction Fox Lane and Rock Hill Road that have no place to hang washing and no balcony, I am not surprised, however although they are poorly designed they were all occupied soon after the site was released.</p> <p>The Dodford with Grafton Parish Council express their concern that if the suggested housing growth goes ahead what are the implications for Bromsgrove to meet its own commitment in the context of Birmingham's request.</p> <p>The Worcestershire SHMA did not consider these wider Growth issues. It is important that this observation should not be taken as a criticism of that study but rather as a matter of fact which needs to be dealt with in an appropriate fashion.</p>	<p>location to existing development and well integrated with the existing pattern of settlement. The NPPF states that "Planning policies and decisions should aim to ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials....." It is a misconception that building high rise blocks of flats results in less land take than more 'traditional' development layouts.</p> <p>It is understood that the flats on the junction of Fox Lane and Rock Hill are 3 storey buildings.</p> <p>The HGDS only considers the issue of Redditch growth being required within Bromsgrove District.</p> <p>There is no plan to undertake an immediate Green Belt review within Bromsgrove as there is sufficient supply of sites in the short term. A review will be undertaken within Bromsgrove as part of the next plan to release land to meet Bromsgrove's longer term requirements.</p> <p>The Worcestershire SHMA was completed in advance of understanding the scale of the issue of Birmingham growth needs which cannot be accommodated within the city. Until this information on need and supply is available there is no evidence on which to base decisions about further plan related work in Bromsgrove or Redditch.</p>
<p>Why is RBC just accepting this target and not looking for yourselves to see what best suits the residents of Redditch? If the need is so great, where are all these people living now?</p>	<p>The housing requirement is derived from the Worcestershire SHMA (2012). This Assessment was commissioned on behalf of the Worcestershire Authorities as part of the Localism Act's initiative to remove top-down development targets and return decision-making to the local level. The population demographic is changing. People are living longer and we have an increased aging population. The country is also experiencing a baby boom at the moment, which is also affecting the growth rate.</p>
<p>Query how this decision fits in with the Regional Housing Strategy.</p>	<p>The West Midlands Regional Housing Strategy (2005) aimed to assist delivery of the WMRSS which no longer exists.</p>
<p>It is cheaper to build all houses in one discreet area. This ignores the</p>	<p>There is no evidence to suggest that building in one area around</p>

Sub Issues	Officer response
environmental impact of such a development	Redditch is likely to be cheaper. The environmental impacts of areas have been assessed through the SA.
Acknowledge that the HGDS does not seek to accommodate development in Malvern	Noted
Lack of housing capacity in Redditch is a Redditch issue alone. It has been presented as something affecting both Councils to the same degree	This is incorrect, there is a duty to cooperate and for that cooperation to be meaningful. The decision needs to be endorsed by both Councils for inclusion in both plans for submission
RBC should make its case independently of BDC then BDC replying with its position	
The duty to cooperate is a reciprocal process not a mechanism for enabling unmet needs in one area to be met in another	
South Worcs authorities keen that all of the housing needs are met either within your administrative boundary or as suggested partly within neighbouring Bromsgrove through joint working.	Noted
Wyre Forest DC supportive of the suggested sites for accommodating growth arising from Redditch Borough within Bromsgrove District.	Noted
The two authorities approach to strategic planning is admirable. It demonstrates that both Authorities have engaged with the duty to cooperate unlike others	Noted
Do not believe cooperation between Authorities is enough to discharge duty to cooperate. Following RSS revocation DTC is more important than ever. Birmingham growth is an established strategic matter and cannot be postponed.	The authorities will be completing more work to prepare for submission versions of their Plans to ensure the duty to cooperate is complied with. The matter of Birmingham growth is being considered by the Councils so this duty is also being complied with.
In relation to Bromsgrove Local Plan the City Council's principle interest will be in Examining how land within Bromsgrove might contribute to meet the housing shortfall emerging in Birmingham to meet needs up to 2031 and beyond.	
Bromsgrove and Redditch appear to have a less than 5 year housing land supply.	Based on the target of 6,400 dwellings Redditch does not have a five year housing land supply using land within its own boundaries only. This is because a number of the sites that can form part of portfolio of

<b>Sub Issues</b>	<b>Officer response</b>
<p>RBC only has a 3.4 year housing land supply. This does not comply with the requirements of Para 47 of the NPPF. Without a five year housing land supply, Para 49 of the NPPF will apply, which states "relevant policies for the supply of housing should not be considered up to date if the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites".</p>	<p>sites cannot come forward within five years due to other factors such as land ownership issues.</p> <p>When taking the cross-boundary land in Bromsgrove into consideration (being proposed through this consultation), some development in these areas could contribute to and improve Redditch's five-year housing land supply.</p> <p>Bromsgrove have a 5.87 year supply as of 2013.</p>
<p>There is no indication that additional housing land has been discussed with Stratford Council or other adjoining authorities and we doubt that the duty to cooperate has been complied with properly</p>	<p>Duty to cooperate has been successful with neighbouring Stratford District. The authorities will be completing more work to prepare for submission versions of their Plans to ensure the duty to cooperate is complied with.</p>
<p>While the identification of Areas 4 and 6 appear to have merit more land should be identified in those areas to address the above matters.</p>	<p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p>
<p>Anticipate that if Bromsgrove Plan cannot deal with Birmingham growth matter, an approach like Solihull Council took demonstrating that the matter will be dealt with when appropriate, will be adopted</p> <p>Housing need alone does not constitute very special circumstances for development within the Greenbelt</p>	<p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
<p>Like the draft Local Plan, the HGDS fails to comply with paras 14,</p>	<p>Noted</p> <p>Green Belt policy has not changed. If there are exceptional circumstances to justify rolling back Green Belt the NPPF suggests that this should be done in order to meet objectively assessed housing requirements.</p>
	<p>The HGDS methodology made it clear how each of the sites have</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>30, 85 and 182 of NPPF. It is essential that Local Plans and policies are 'Justified' in order for them to be found sound. They must demonstrate the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Houses for Redditch people - not dormitory town, commuters benefit from our lower house prices, here in Redditch.</p> <p>In a meeting almost 12 months ago, Head of Planning, Ruth Bamford asserted that RBC can demonstrate a 5 year supply of deliverable sites (+ 5%). RBC planners were negligent and inept in that they were wrong in their calculations. RBC planners now say that they do not have a 5 year supply of deliverable sites (+ 5%). This has changed with little or no consultation.</p> <p>Consultation document and Redditch SHLAA do not make it clear that that sufficient consideration has been given by Redditch to their potential urban greenfield capacity.</p>	<p>been considered, and those worthy of further consideration have been analysed in more detail. The SA considers each site as well as looking at combinations of sites. There can be no question of this approach not being thorough in looking at all potential alternatives.</p> <p>The SHMA recommends a housing requirement based upon a range of factors including migration effects to and from Redditch</p> <p>At this time the five year land supply was based upon a rolling forward of the VMRSS target, so the methodology has changed with the production of the SHMA in 2012 and the Redditch housing requirements being expressed as part of the HGDS consultation and Local Plan No.4 consultation.</p>
<p>Redditch does not appear to have carried out an adequate review of its industrial land portfolio. There is anecdotal evidence of a large number of industrial units in Redditch that have been continuously empty for many years.</p> <p>Inclusion of two identified sites within Bromsgrove's administrative area does not resolve the problem of the undersupply of deliverable housing land in Redditch. Be more ambitious and allocate more than a minimum amount of land for residential development in order to significantly boost the supply of housing as necessary to comply with Paragraph 47 of the NPPF.</p> <p>Bromsgrove and Redditch Council's should consider complementing two sites with additional sites, which may deliver earlier in the plan period and add flexibility.</p>	<p>The original SHLAA from 2008/9 identified and assessed 594 sites within the Borough of which some were greenfield. Those considered suitable to deliver residential development were included. The Redditch SHLAA was examined by Bromsgrove officers. It would not be appropriate for the HGDS to repeat information in background evidence.</p> <p>This is undertaken annually in the Redditch ELR. Redditch does not have a large number of vacant industrial units and in fact has low vacancy rates which are required to enable churn in the market.</p> <p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>Consider that a total of 1923 dwellings are reasonably Regarded as deliverable from within Redditch. This leaves a shortfall of 4457 dwellings needing to be delivered from urban extension to the north of the Borough within Bromsgrove.</p> <p>Foxydiate and Brockhill East anticipated to provide 2800 and 600 dwellings respectively. Even in their current form, there would still be a shortfall of 1057 dwellings requiring further allocation</p>	<p>The SHLAA sites within Redditch are considered to be deliverable by the end of the plan period therefore they can all be released to meet the provision of 3,000 dwellings within Redditch. This would therefore leave the cross boundary contribution unchanged.</p>

**KEY ISSUE: Sustainability**

<b>Sub Issues</b>	<b>Officer response</b>
<p>There have been no solar panels on recent developments so these cannot be described as sustainable.</p>	<p>Solar panels are not the only renewable technology which makes a development sustainable. Developments will be constructed to the nationally required standard (Code for Sustainable Homes)</p>
<p>Mitigate the long-term high carbon nature of building new developments</p>	<p>Noted. Incorporating community food growing spaces into any potential development area could be considered further through a Green Infrastructure Strategy and Management Plan for the sites.</p>
<p>Community food growing spaces should be included into new and existing developments.</p>	<p>Green roofs are not the only way to lessen visual impact of new development. However, the use of green roofs is not precluded from consideration and can be employed if and when appropriate.</p>
<p>The visual impact of new developments should be lessened through the use of Green Roofs</p>	<p>Adequate reference to renewables and technologies is made within policies elsewhere in the Bromsgrove District Plan and to repeat these would be too onerous.</p>
<p>All public buildings and refurbishments of public buildings to use the Passivhaus standard for energy efficiency. The Passivhaus standard should also be a requirement for all new private-sector developments</p> <p>May be opportunities to positively connect our landscape with new development plans. Woodlands could become used by social forestry projects to provide materials for hedgerow maintenance, timber-frame buildings.</p>	<p>Agreed. However it is not the remit of planning policy to implement initiatives such as these.</p>

KEY ISSUE: Infrastructure – Rail

<b>Sub Issues</b>	<b>Officer response</b>
<p>We would request that any planning applications from developers that arise as a result of the Bromsgrove and Redditch Consultation on Housing Growth should contact Network Rail for any proposals within the area to ensure that:</p> <ul style="list-style-type: none"> <li>(a) Access points are not impacted</li> <li>(b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g. <ul style="list-style-type: none"> <li>• Drainage works / water features</li> <li>• Encroachment of land or air-space</li> <li>• Excavation and earthworks</li> <li>• Wind turbines</li> <li>• Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues</li> <li>• Lighting impacting upon train drivers ability to perceive signals</li> <li>• Landscaping that could impact upon overhead lines or Network Rail boundary treatments</li> <li>• Any piling works</li> <li>• Any scaffolding works</li> <li>• Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949)</li> <li>• Any use of crane or plant</li> <li>• Any fencing works / acoustic fencing works and boundary treatments</li> <li>• Any demolition works</li> <li>• Any hard standing areas</li> <li>• Works adjoining / adjacent or near to railway stations</li> </ul> </li> </ul> <p>We would very strongly recommend that developers are made aware</p>	<p>Officers have previously made developers and Network Rail aware of the development proposals.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>that any proposal within 10m of the operational railway boundary will also require review and approval by the Network Rail Asset Protection Team, and such schemes should be accompanied by a risk assessment and a method statement. No works should commence on site without the approval of the Network Rail Asset Protection Engineer. Network Rail is required to recover any expenses incurred in facilitating third party proposals, a BAPA may be required for works on site.</p>	
<p>Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such railway improvements; it would also be appropriate to require contributions towards rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network.</p> <p>The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impacts on the rail network.</p>	<p>Network Rail will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch. The Councils have not yet determined whether or not a CIL charging schedule will be pursued, however developer contributions may be appropriate through S106.</p>

KEY ISSUE: Infrastructure – Police

<b>Sub Issues</b>	<b>Officer response</b>
<p>The development and associated population growth proposed by sites identified in the Local Plan, alongside growth in Bromsgrove carries significant infrastructure implications for the police service</p> <p>To fulfil its statutory obligations WMP require provision of a new dedicated police station in Redditch in the long term. HWFRS however are of the view that a new capital facility is not required in the Borough.</p>	<p>Noted. The Police Service will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch.</p>
<p>We accept that the Council will require robust and credible evidence to support the case for contributions from the strategic sites, urban extension and other development across the Borough towards the new facility. Consequently, consultants WYG will prepare a Strategic Infrastructure Assessment (SIA) during the August/September 2013 public consultation on the Local Plan.</p>	<p>Noted. This can be identified in the Infrastructure Delivery Plan for Redditch.</p> <p>Noted. The strategic infrastructure assessment will inform the Infrastructure Delivery Plan.</p>

KEY ISSUE: Infrastructure - Electricity

<b>Sub Issues</b>	<b>Officer response</b>
<p>WPD [may have] [has] a number of strategic electricity distribution circuits (which can operate at 132,000 Volts, 66,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits may run both underground and as overhead lines (on either towers/pylons or wood poles). WPD may also have electricity substations in these areas. Would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.</p> <p>WPD would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on WPD to either divert or</p>	<p>Noted. It is expected that developers will engage directly with WPD in relation to their development proposals. Furthermore, WPD will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch.</p>

<p>underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on WPD to operate an economic and efficient electricity distribution system.</p> <p>WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines</p>	
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KEY ISSUE: Miscellaneous – Planning/ consultation process

<b>Officer response</b>	
<p><b>Sub Issues</b></p> <p>Constructive 'consultation' on future building sites without choices is a misnomer, focusing on the wording of 'chosen' vs 'preferred' options</p> <p>Question whether all stakeholders and residents in the area have been notified of development</p>	<p>Consultation was undertaken on broad areas for development in 2010, following this, 20 potential areas have been analysed in the HGDS. It is therefore appropriate at this stage for the Councils to choose a preferred option as this is required for the plan-making process.</p> <p>All statutory consultees and residents on both Councils planning consultation databases were notified of the Housing Growth consultation period. Consultation was also advertised on both Councils websites, in local press, posters in public buildings and the Kingfisher Shopping Centre. Posters and consultation material was placed in the Redditch public libraries and One Stop Shops. Six drop-in sessions were advertised and Parish Councils notified. Letters were posted out to all properties in the whole of Area 4/ Foxlydiate area due to free papers not being received here and the isolated nature of many of the properties .</p> <p>If residents want to be notified of the future plan-making stages, they can be added to the databases at any time.</p> <p>When any planning application is submitted, residents and stakeholders will be consulted and given the opportunity to comment on the detailed proposals.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Why haven't other Council's cooperated with Redditch under the Localism Act</p> <p>Local Authorities should be able demonstrate that they have liaised productively with adjoining Authorities in the Redditch case, Bromsgrove and Stratford according to Para 110 of Localisation Act. Several plans have been returned by Planning Inspectorate in Coventry and North Worcestershire, where this cross-border co-operation hasn't happened. Has this cross border co-operation actually been taken seriously and pursued effectively and thoroughly in this Redditch Growth documentation?</p> <p>Stratford is at risk under the Duty to Cooperate for not engaging more constructively in cross boundary co-operation.</p>	<p>Both Redditch and Bromsgrove Councils consider they have fulfilled the requirements of the Localism Act in terms of the duty to cooperate. Duty to cooperate has been successful with neighbouring Stratford District. The authorities will be completing more work to prepare for submission versions of their Plans to ensure the duty to cooperate is complied with.</p>
<p>Six weeks is inadequate to respond to such complex planning proposals. How will residents be able to assimilate, analyse such a plethora of information?</p> <p>Why is the current proposal being rushed through? Your various committees/bodies must have been working on this for years behind closed doors – why should those who this most effects be given only weeks to consider/challenge the proposition and come up with alternatives?</p> <p>There has been no accumulation of worthwhile evidence produced by this Council and its favoured developers to show favour for Webheath and Local Plan No.4 in a comparison study of all potential sites. This is undemocratic and by Local Government law borders on illegal</p> <p>Has been arranged underhandedly as I was not aware until now. People of Redditch would not approve such a development</p>	<p>Stratford on Avon District Council is considered to be complying with the duty to cooperate with the allocations for Redditch to meet Redditch's needs for employment at Redditch Eastern Gateway and in exploring potential for small scale housing in the A435 Corridor. It is not for Redditch and Bromsgrove to comment on Stratford's interaction with other neighbouring authorities.</p> <p>Six weeks for consultation is the standard timeframe set out in both Councils adopted Statement of Community Involvement which described how consultation at different stages will be carried out. The drafting of the plans has taken a long time for both Council's and it cannot be considered as being rushed.</p> <p>The process of drafting Local Plan No.4 and the HGDS explains the rationale for the selection of sites in a transparent manner.</p>
<p>Disagree, the opportunities to view the document and attend the drop in sessions have been well advertised to every resident through the local press and on the Council's website, plus through posters in</p>	<p>Disagree, the opportunities to view the document and attend the drop in sessions have been well advertised to every resident through the local press and on the Council's website, plus through posters in</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Redditch has a responsibility to their residents and shouldn't be bullied into accepting what Bromsgrove offers, it just isn't acceptable.</p> <p>You have been warned by your officers that you risk non-compliance under Duty to cooperate of the Localism Act. This Act simply says that when there are very strong reasons to work together on planning issues in the interests of all local residents, then that should happen. It should not be used to threaten Councillors to revoke democratic decisions already taken. The Localism Act states "The act devolves greater powers to Councils and neighbourhoods and gives local communities more control over housing and planning in their area".</p> <p>Three tiers of government opposed HGDS proposals particularly:</p> <ul style="list-style-type: none"> <li>• Bentley Pauncefoot Parish Council submitted objections</li> <li>• Leader of BDC stated publicly "we don't want these houses, we don't want to destroy our green belt".</li> <li>• MP for Bromsgrove expressed his "opposition to the building of thousands of houses in our green belt".</li> </ul> <p>BDC cherry-picking the Localism Act to the detriment of "Rights and Powers for communities and individuals". Using this to put on RBC to have a re-vote to agree the joint consultation and its decision to go ahead with the consultation even if RBC did not decide to go ahead.</p> <p>Bromsgrove does not have to comply and assist the Redditch Growth plan, it can say no and listen to its own population who do not want this development for many valid reasons.</p> <p>Government policy on Localism is guidance not mandatory. Councils have fiduciary duty to act in the interest of the local population hence democracy. Not in the spirit of localism, partnership or democratic process. Puts Councillors in an impossible position.</p>	<p>Councils buildings. There has been a good response to consultation. This is not the case; the HGDS was undertaken by both Redditch and Bromsgrove officers and agreed for consultation by both Councils</p> <p>The Duty to Cooperate is a piece of legislation introduced through the Localism Act (section 110). The Duty requires Local Planning Authorities and other key stakeholders to cooperate with each other on strategic matters. The Localism Act states that Local Planning Authorities and other key stakeholders are required to engage constructively, actively and on an on-going basis in any process by means of which development plan documents are prepared so far as relating to a strategic matter.</p> <p>The Parish Council's comments will be considered as part of the consultation. The BDC leader has in his duty as part of the Cabinet and Council for BDC has agreed to put the HGDS on consultation so that the District Plan complies with national policy. The MP for Bromsgrove has also responded to the consultation and those comments will be considered as part of the consultation.</p> <p>It is unclear from the respondent which part(s) of the Localism Act concerning rights and powers to communities and individuals are being excluded from consideration.</p> <p>With regards to Redditch New Town comments this does not relate to growth locations required to meet housing and employment requirements between 2011 and 2030.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Redditch took the decision to become a New Town nearly 50 years ago, why should Bromsgrove take up slack when Redditch has already exercised its development option?</p>	
<p>The localism act appears to be being breached i.e. no consideration for local views factored into the equation. Your dept. has produced this "Hobson's choice" site proposal</p>	<p>The key part of the Localism Act is the Duty to Cooperate, introduced through the Localism Act (section 110). The Duty requires Local Planning Authorities and other key stakeholders to cooperate with each other on strategic matters. The Localism Act states that Local Planning Authorities and other key stakeholders are required to engage constructively, actively and on an on-going basis in any process by means of which development plan documents are prepared so far as relating to a strategic matter. It is considered that this is being complied with.</p>
<p>Bromsgrove bulldozing through Foxlydiate, with a complete rejection of any other site on the boundary of the two boroughs</p>	<p>This is not the proposal of one Council; it is both Bromsgrove and Redditch. The sites were chosen after analysis of 20 different sites being considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>I was at a meeting where it was agreed that leaflets should be included within the council tax post. I am still waiting.</p> <p>No communication to Area 4 (Site 1) residents from BDC until a few days before joint consultation period commenced. BDC Planner at Bentley Drop-In session conceded that a letter to Area 4 (Site 1) residents to let them know the situation as it developed would have been reasonable.</p> <p>Why have the population surrounding proposed sites (Bentley) not been informed by the Council via post of the plans. There are many who have no idea and their views will not be heard. I was informed by a Council officer at a recent meeting that the Council were not able to inform the public as they did not have contact details, which is rather surprising as voters, council tax payers we receive communication.</p>	<p>These leaflets were to be sent out with the Council Tax reminder letters. However because the consultation was not agreed at the first Full Council meeting in Redditch, the deadline for sending out the leaflets passed and the opportunity was lost.</p> <p>Notification of the consultation period was carried out in accordance with the SCI (Statement of Community Involvement). This document has been in place since June 2006. All statutory consultees and residents on both Councils planning consultation databases were notified of the Housing Growth consultation period. Consultation was also advertised on both Councils websites, in local press, posters in public buildings and the Kingfisher Shopping Centre. Posters and consultation material was placed in the Redditch public libraries and One Stop Shops. Six drop-in sessions were advertised and Parish Councils notified.</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>This is inexcusable and one I believe could be seriously challenged.</p> <p>Very disappointed with lack of information and contact with people. A lot are not really sure what is going on and where these houses will be built all due to lack of information.</p> <p>Limited notification of drop-in sessions. All residents likely to be affected should have received a leaflet. Request denied due to cost. Instead a minimal number printed and left to Parish Council and local volunteers to deliver. Hence a limited awareness of situation. Not good enough to guide people to the website (as per Emma Baker's email to Lynda Warby, 2 April). Communications costs should be in the plan.</p>	<p>If residents want to be notified of the future plan-making stages, they can be added to the databases at any time.</p> <p>When any planning application is submitted, residents and stakeholders will be consulted and given the opportunity to comment on the detailed proposals.</p>
<p>I believe plans are further progressed that we are led to believe.</p> <p>No planned drop-in session at Bentley although this was most affected community in Area 4 (Site 1). Had to make a special request for this to be held. Why did Alvechurch village hall have a drop-in session planned? How is Alvechurch affected by any of this? Why were initial Council planning meetings held in the Alvechurch area when the proposals had changed from Bordesley to Bentley, Foxlydiate and Webheath was this a plan by the Council to ensure those affected would not know of the venue in order to voice an opinion.</p> <p>The developers are leading the council. This site would not be a decision for Redditch people, it would be chosen because it is the most profitable and developers are pushing for it. At the consultation your representatives could give no valid argument for this development over other potential sites other than it is what the developers want.</p>	<p>The status of the draft Plan for Redditch and Bromsgrove and the consultation on the Housing Growth for Redditch has been sufficient explained in the HGDS and the Plan. The future stages have also been explained, and it is not possible to advance the two plans any further or quicker than has been planned.</p> <p>The sites for the drop in session were the ones readily available for the sessions. Alvechurch have been used previously for the consultation in 2010 and received a reasonable attendance, particularly from people in Alvechurch parish. The venues were advertised equally and were well attended.</p>
	<p>The sites were chosen after analysis of 20 different sites being considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. There is no consideration of profit. Potential developers exist within many of the sites so it is not reasonable to suggest that the sites exist only where there is interest.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>The Council would not have sufficient funding to support upgrading major roads to cope with the demands, however, a construction firm who want the new house building business have offered to fund major works, this clearly shows the extreme profit some companies will gain.</p>	<p>It is normal for private house builders to require a reasonable profit from developments that they provide.</p>
<p>Why build in one place instead of spreading the load? I suspect it is to limit the vote losing potential of the plan; you scarify any support you have in Webheath and Bentley and hope to garnish support from areas where no development is taking place.</p>	<p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>To access information on Sites other than 1 and 2 requires access to the Council's website. Not everyone has such access.</p>	<p>All evidence published supporting the consultation was available at the drop in sessions for people to read. Also it was explained within the consultation material that anybody can come to the two Council's offices to view any material if they did not have access. The documents themselves also state that CDs can be made available if people do not have internet access.</p>
<p>It has been hard to submit information through the Redditch website. There were no links to the correct section</p>	<p>There are links to the consultation document from the RBC website and the BDC website and there have been no technical issues reported. The respondent has submitted their comments</p>
<p>EA recommend that WCS is updated to reflect the latest proposals</p>	<p>Site specific Drainage strategies and FRA are being completed to supplement the information in the Council's WCS.</p>
<p>There should be continued discussions with Severn Trent Water in establishing the constraints, upgrade requirements and implications for development, as part of the process for updating the WCS report/producing an Infrastructure Delivery Plan.</p>	<p>Noted, this is being undertaken by both Councils</p>
<p>BDC, RBC, Council Drainage Engineers, Environment Agency, Severn Trent Water, Highways Agency and British Waterways, Developers, Council Officers and Councillors must be prepared to be held culpable if future flooding occurs if this development takes place.</p>	<p>There would be no liability on public bodies if the proper assessments and mitigation to alleviate any risks from flooding have been approved and undertaken to appropriate standards.</p>
<p>The first consultation period included school Easter holidays. The second is due during August – good for Planners taking their</p>	<p>Availability of planning officers to undertake consultation is not a concern. Where bank holidays fall within consultation periods, extra</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>holidays, bad for residents. Considering the seriousness of the consultation process and that it relates to adults a “smiley face” symbol is inappropriate and patronising.</p>	<p>days can be added to the consultation period to allow for this. The system of adding smiley faces to the documents is a simple and effective way of describing when input has been/is sought during consultation.</p>
<p>On speaking to a BDC Planner at the Bentley Drop-In session, he conceded that there could have been a consultation on the five areas taken forward to the focused appraisal stage, but instead BDC had chosen to skip this stage.</p>	<p>This is incorrect; the consultation took place on the wider areas in 2010.</p>
<p>BDC have narrowed the consultation to one option two areas only (sites 1 and 2) and are leaving it to residents to back-track to reassess all the five areas.</p>	<p>The consultation was instigated by both BDC and RBC, so this is not one Council’s choice. The wider options have already been consulted up, and it was necessary to select a preferred option before the Council’s published a plan with an allocation or allocations proposed within them.</p>
<p>To consult on only two options is contrary to Bromsgrove’s SCI, Page 13, section 7 ‘how we will involve people’</p>	
<p>A consultation should provide all options available to enable full consideration. It should not be fait en compli.</p>	
<p>To residents it has been stated by planners and councillors that only “new evidence” will be considered. So why are planning officers not asking for evidence in this process?</p>	<p>This is what the consultation period is for, to receive new information or evidence.</p>
<p>The response forms are not fit for purpose. They seek people’s views which is different. Most will only be able to state their views. How are planners going to use this information?</p>	<p>Most people have chosen not to use the response forms to respond, and the form was only provided to guide some members of the public in their responses but there has been no restriction and many have taken the opportunity to submit their views in a variety of ways.</p>
<p>Ruth Bamford said at the RBC meeting on the 25 March, that: “no volume of public response against the proposal could count as a material factor in the decision making process...” Therefore this is a “tick box” exercise only and the reason for not “consulting” previously in relation to the five areas taken forward to the focused appraisal stage.</p>	<p>Disagree, the content of the responses and the evidence submitted it what will be taken into account; this is standard practice in plan-making. The previous joint consultation on wider areas was undertaken in 2010 so it is unclear why the respondent believes it has not taken place before.</p>
<p>There should be some benchmarks established prior to consultation</p>	

<b>Sub Issues</b>	<b>Officer response</b>
<p>that would give people a measure to refer to when the Council reaches its conclusions, i.e. at what level of objection you deem the scheme 'unsuitable'</p>	
<p>There were no hard copies available for residents or the Action Groups. The request for hard copies was turned down due to cost. Residents therefore had to pay to have copies printed. Communications costs should be in the plan.</p>	<p>It is not feasible to reproduce such large copies for anybody who asks as there are limited budgets; therefore all documents can be accessed online on the consultation website.</p>
<p>RBC website said personal (addresses) would not be published.</p>	<p>Names or addresses of those writing into the consultation will not be published as part of the Councils response to the representations received. However, all representations received are a matter of public record and can be viewed upon request.</p>
<p>At consultation representatives could give no valid argument for this development over other potential sites other than it is what the developers want</p>	<p>The HGDS explains the rationale for the consultation and the officer's endeavour at the events to answer questions from the members of the public, about the consultation and the contents of the consultation documents.</p>
<p>Question soundness of consultations. It was not clear that:  a) there are two consultations on-going b) what their interrelationship is. Some information is confusing e.g. the Foxydiade site shown as Site 1 in Housing Growth leaflet but Site 4 in Executive Summary. Information about Local Plan No.4 hard to find at event and not all staff aware of it's existence.</p>	<p>The HGDS was advertised in the local newspapers, posters through the Town and in Council buildings, and a separate website and drop in sessions were very well attended.</p> <p>RBC, to avoid confusion between the HGDS and the Local Plan consultations, has advertised separately and written to consultees separately. The map referred to explains clearly that the blue designated areas within Redditch are related to Local Plan No.4 and they are considered to be labelled clearly. All officers attending the events were aware of the Local Plan No.4 consultation; however Bromsgrove officers sought out Redditch officers to talk about the Redditch plan to any members of the public asking to discuss it.</p>
<p>Why haven't the visually impaired been taken into account?</p>	<p>It is unclear what this comment refers to. Events for consultation were advertised at a variety of accessible locations. The consultation documents state that the Councils consider reasonable requests to provide them in accessible formats such as large print, Braille, Moon, audio CD or tape or on computer CD.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Study should have been produced before the draft Local Plan. Since the purpose of the HGDS informs the Local Plan process, it is astonishing that the two are published together.</p> <p>Both documents out for consultation at the same time, which gives the appearance that the two have been prepared independently and that there is little intention of allowing public response to either influencing the other.</p>	<p>The study is required to inform the Local Plan and District Plan. The Local Plan for Redditch was put on consultation at the same time as the HGDS and they were consistent in their references. It is impossible to separate the issue of Redditch growth internally and externally.</p> <p>Redditch Local Plan No.4 has been prepared independently by Redditch officers and agreed for consultation by Redditch members; however the same Redditch officers have prepared the HGDS with Bromsgrove officers. It is unclear why the respondent thinks there is no public response allowed when they have responded alongside many others during the advertised consultation period.</p>
<p>Page 6 of the HGDS presents Local Plan 4 as if it is already policy.</p>	<p>On Page 6 the only reference to Local Plan No.4 is para 1.23 which states "The results of this consultation will be incorporated in the draft Local and District Plans (previously called the Core Strategy) of both Councils." This refers to the documents correctly as draft versions, not existing policy.</p>
<p>No leaflet has been posted through resident's letterboxes in Webheath</p>	<p>The Housing Growth Consultation concerned all twenty areas around the edge of Redditch and not just Webheath, therefore leaflets being delivered to only one area was not justified. It was not feasible to leaflet all residents within and around Redditch separately and the opportunity to post fliers with the Council Tax letters had passed before the consultation was approved.</p>
<p>Advertising of Redditch Growth is poor.</p> <p>The planned RBC consultation drop in sessions have been poorly advertised</p>	<p>Disagree.</p> <p>All statutory consultees and residents on both Councils planning consultation databases were notified of the Housing Growth consultation period. Consultation was also advertised on both Councils websites, in local press, posters in public buildings and the Kingfisher Shopping Centre. Posters and consultation material was placed in the Redditch public libraries and One Stop Shops. Six drop-in sessions were advertised and Parish Councils notified.</p> <p>If residents want to be notified of the future plan-making stages, they</p>

Sub Issues	Officer response
	<p>can be added to the databases at any time.</p> <p>When any planning application is submitted, residents and stakeholders will be consulted and given the opportunity to comment on the detailed proposals.</p>
<p>Highly suspicious nature of the re-submitting of the Redditch Growth report, so quickly, after it was thrown out at the RBC Full Council meeting on the 12th February. The time frame, vague wording in RBC constitution and the reason given that compliance with the Localism Act is paramount, should be tested in law.</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>WAG collected evidence that residents of Webheath do not want large scale housing developments upon the Webheath ADR and Folydiade. Neighbourhood Planning within the Localism Act (2011) has influenced this work. This evidence is:</p> <ul style="list-style-type: none"> <li>- Petition 2011 - Against any development of the Webheath ADR &amp; Folydiade - 1,016 signatures.</li> <li>- Petition 2012 - Urging the Planning Committee to refuse development - 1,283 signatures.</li> <li>- Surveys 2012 - 133 Webheath residents completed a detailed online survey i.e. 65% said No new houses, 31% said 0 to 50 houses, and 4% said 50 to 100 houses. See Appendix One Page 5 of 122 (Webheath Neighbourhood Planning Consultation Survey - Future Housing - Key Interim Findings - 31/07/2012)</li> <li>- Petition (Online &amp; continuing) Feb. 2013 - Against any development of the Webheath ADR &amp; Folydiade - 1,008 signatures, so far and still open.</li> </ul>	<p>Noted and petitions/survey have been received.</p>
<p>Planning officers over-influenced by what land developers have put forward. May be appropriate for a short-term technical document such as a SHLAA, but development land is more valuable than agricultural land, so ownership should not be a prime consideration in looking almost 20 years ahead</p>	<p>Developers of the sites have information that can inform the Council's decisions, so if the work is corroborated by officers there is no issue with using it, especially if its related to the delivery of the site. However, for this consultation the HGDS was an officer led analysis of sites which looked at 20 sites irrespective of ownerships.</p>

<p><b>Sub Issues</b></p> <p>For a proposal of this magnitude, I would have thought that the interests of both Bromsgrove and Redditch would have been well served by RBC setting out its position and BDC then examining Redditch's plan and setting out its own separate position.</p>	<p><b>Officer response</b></p> <p>Bromsgrove and Redditch Councils need to demonstrate how the policies and proposals which deal with cross boundary issues have benefitted both areas, and that meaningful cooperation has been achieved. There are benefits to both Councils for an agreement on areas to be met by undertaking the work in cooperation.</p>
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KEY ISSUE: Miscellaneous – Democratic process

<p><b>Sub Issues</b></p> <p>The council, which is elected by Redditch residents and should represent their wishes</p> <p>It would appear the system is corrupt with biased decisions</p>	<p><b>Officer response</b></p> <p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>Why have the members of OUR Redditch council been so misled by the few into believing the best for all is being done?</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>I question the democratic process used by Redditch Borough Council to force this through. The first vote to put the plans out for consultation was defeated. Yet RBC decided to hold a second vote</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>I question the democratic process used by Redditch Borough Council to force this through. The first vote to put the plans out for consultation was defeated. Yet RBC decided to hold a second vote</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>despite the lack of new material to support this second vote. The second vote was only won by a single vote - which suggests this is a highly controversial plan. With the development plans of Redditch for the next 20 years at stake, surely this needs the support of all political parties and the all residents.</p> <p>Why does everyone opposed to these development proposals, and not just the residents of the areas in question, believe that OUR council are ignoring our feelings and fears and despite their statement of wholehearted service to the community who pay their expenses and who voted them in in the first place.</p> <p>I do not approve of the undemocratic processes so far leveraged by the Redditch Borough Council to implement this plan, in continually disregarding the interests of local people such as myself whose lives are likely to be seriously negatively impacted by the proposal.</p> <p>To have to watch a so called senior Redditch councillor smirk at the dismay of the Webheath residents at the town hall meeting to vote for the consultation, is so disgusting.</p> <p>Council treating local residents disrespectfully and unfairly. The vote at recalled 25<sup>th</sup> March was Labour versus Conservative game. Convenient excuse for no public speaking using PURDAH as a</p>	<p>consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p> <p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p> <p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p> <p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p> <p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>reason. This proves we cannot rely on elected Council to make sound and logical decisions on the future of our town.</p>	<p>Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>Residents are being patronised and seriously let down by the apparent relentless drive the council displays to appease Central Government, the developers and their own self interests.</p>	<p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>Think twice Mr and Mrs Councillor before you finally decide. There are a heck of a lot more voters in the threatened areas than in the alternatives (considered or not considered). We shall take care of you at the next election if you display a lack of intelligence, business sense, compassion and consideration for the people who put you where you are and expect the best decisions to be made for the people who count in this fair town.</p>	<p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>I object to a Council who cannot organise a vote to go to consultation and then calls another public vote which is carried by 1. The public had no chance to verify that vote and had to rely solely on a hand count by the Chair who could not get it right the first time. No wonder this Council is so easily gulled by the widely more experienced spin and sales personnel of the developers</p> <p>Britain has always been proud of its democracy: these proposals imply that residents are merely an obstacle to be overcome, rather than valued individuals who invest in their surroundings.</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>How can an area of this size be destroyed by a set of councillors who we haven't elected and have no influence over? How can they actually make decisions about our future without the public scrutiny of</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to</p>

Sub Issues	Officer response
<p>those most affected? This is not democracy and if Bromsgrove Councillors are already saying it is the right place from their point of view, what good is consultation?</p> <p>If I had a suspicious nature, I would wonder if this is a political decision/agreement to keep Bromsgrove Councillors happy. I wonder where their Leader lives?</p> <p><a href="http://www.bromsgrovestandard.co.uk/2012/12/09/news-Row-over-planning-rules-57683.html#ixzz2EIV5TSiv">http://www.bromsgrovestandard.co.uk/2012/12/09/news-Row-over-planning-rules-57683.html#ixzz2EIV5TSiv</a></p> <p>It shows how Hollingworth allegedly operates - it shows how he uses his office to make biased decisions about his ward and where he lives.</p> <p>Just as he has (allegedly) influenced the decision by RBC/BDC planners to propose building thousands of houses in Foxlydiate instead of where it is more Sustainable in Bordesley.</p> <p>I am not alone in feeling like the people of Redditch are being dealt with by BDC like scum. You only have to read councillor Hollingworth's comments in the press to see that he in particular does not welcome the situation of co-operating with Redditch in facilitating these houses. I thoroughly reject the 'chosen sites' as being valid choices; I do not feel like we have been given fair chance to have our say.</p> <p>How many of you making the decisions actually live in the vicinities ruined? A leading Redditch Councillor residing in the Charford area of Bromsgrove doesn't sound quite right to me. What the eye doesn't see, the heart doesn't grieve over.</p>	<p>consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p> <p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p> <p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p> <p>These are serious allegations made against an individual councillor, which the Monitoring Officer would wish to address and any information that can substantiate them should be referred to the Monitoring Officer as outlined above.</p>
	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details</p>

Sub Issues	Officer response
<p>Any Councillor with a vested personal interest, i.e. live in an area that may be impacted upon should not have a major say on any option.</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>It was really interesting that at the council meeting, the Conservative Councillors 'objected' and the Labour Councillors carried the motion with self-satisfied smug expressions. I ask you to take a look at where those Labour Councillors live. How many live in Webheath and Foxlydiate? I bet that the answer is less than 1! So they won't be affected in the slightest! It makes you wonder if there have been any nice arrangements made between the developers and the councillors. With the way that the voting went, I would expect the council to carry out an investigation.</p> <p>Do any of the Councillors live in Bordesley? If so how many and what are their views on the proposal or need we ask.</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>Bromsgrove weaker council has dictated where they want the un-needed dwellings to be a blight on Redditch &amp; it seems Redditch council currently led by a Bromsgrove person has meekly acquiesced.</p> <p>It is quite obvious that Redditch Council is deferring to the demands of Bromsgrove Council and in particular Labour Councillors are voting en bloc to determine the fate of Webheath residents, the majority of whom are Tories.</p> <p>Don't let Bromsgrove council dictate where the development should be.</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>Bromsgrove will gain a payment for the land, the revenue from Council Tax and yet none of the liabilities such as the drain on our</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the</p>

Sub Issues	Officer response
<p>resources</p>	<p>proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>It appears that although the idea was never put to the vote at a local election a cross-border arrangement to consider growth of housing on Green Belt Land has been made. This at the very least is undemocratic and the excuse that if the electors don't like it then they can vote it out is fatuous as Redditch Council "decided" to have only one-third of itself elected at an election. I do not remember this being put to the electorate either.</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>Is a council member doing business behind the scenes with a developer?</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>Given the depth of collaboration between Bromsgrove and Redditch Councils in this planning initiative and wider services, perhaps it is now time to open the local debate for merger of the two councils. In doing so creating greater transparency in decisions for the public and enhancing cost savings in both councillor posts, managers, administrators and especially planners.</p>	<p>Redditch Borough and Bromsgrove District Councils are two sovereign organisations, being Local Planning Authority for their respective areas, with two teams of Planning Policy officers. Any question of merger of Councils is a matter for central government and the Government has made clear that it is not proposing further merger of local councils.</p>
<p>Is it the intention politically to join Redditch and Bromsgrove town together, and therefore develop houses on the land between the two to bring this about in a practical way?</p> <p>The Councils have decided to join Bromsgrove and Redditch physically by developing a set of objectives which steers REDDITCH's 'so called' housing need towards improving Bromsgrove's town centre as well as Redditch's.</p>	<p>However, the Duty to Cooperate requires Redditch Borough and Bromsgrove District Councils to work together to find a solution to meet the housing need. The joint objectives relate solely to the cross-boundary growth study in order to ensure that the preferred option for growth benefitted both Plans' Objectives.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>BDC residents not aware this vote was taking place therefore only 2 members of the public were present. This contrasts with the "openness" of RBC. The run up to the consultation period was during election campaigning so we were told we were not allowed to speak at meetings.</p> <p>Notes from full BDC meeting of 20 Feb 2013 (when the vote to agree to the joint consultation was taken), were not available before the commencement of the consultation period i.e. 1 April.</p> <p>Failed to meet the requirement of 9 clear working days notice which the Constitution requires for submission of non-procedural motions. A motion to rescind a previous decision is not a procedural motion. This is evidenced by the fact that 7 Labour Members deemed it necessary to sign the paperwork on the 12<sup>th</sup> March to enable this rescinding of the previous decision.</p>	<p>Agenda papers and minutes are all published in compliance with the Access to Information Regulations and were in relation to the BDC Council meeting on 20 February 2013.</p> <p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>

KEY ISSUE: Evidence Base - General

<b>Sub Issues</b>	<b>Officer response</b>
<p>Another consultation document is required with ALL potential options for a fair consultation</p>	<p>This consultation was undertaken in 2010 and all 20 areas have been analysed in the HGDS. It is appropriate at this stage for the Councils to present a preferred option.</p>
<p>The number of residents within both these areas (Foxydiat and Bordesley) should not also be used to finalise the decision of where to build.</p>	<p>This is not a consideration in the selection of sites 1 and 2</p>
<p>The infrastructure and ecological facts should be used not how much money will be donated by the developer</p>	<p>Developer contributions are not a consideration in the selection of sites 1 and 2.</p>
<p>Several years ago in the time of the 'regional strategy' Redditch planners claimed that there was net migration from Redditch. If this is the case we do not need 7000 - a more realistic figure would be 3000 which could be accommodated within Redditch boundaries</p>	<p>The objectively assessed housing requirements are based upon the information contained within the SHMA 2012.</p>
<p>How much agricultural land will be lost if the proposal is agreed?</p>	<p>Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed</p>

Sub Issues	Officer response
	housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development. It is not known specifically how much land take would be changed from agricultural use to development.
Are all the recommended sites (on the Consultation leaflet) chosen by the planners or have councillors had any input?	All consultation material had approval from both Councils' members at Full Council.
No local knowledge displayed by the decision makers	This is not the case, all sites have been analysed and officers have undertaken numerous site visits throughout the preparation of the HGDS and the decision to consult was made by elected members of both authorities.
How do you expect people to give evidence based alternatives without having access to detailed information on alternative sites? There was nothing in the consultation which provided any information on alternatives or any summaries to enable people to arrive at suggested evidence-based sites	The information on alternatives was included in the HGDS and assessed through SA. All background evidence is available on the councils website and the consultation website.
Consider the impact of population growth on existing church buildings and where necessary, increase the capacity of the buildings to allow for additional activities (i.e. St Phillips Church, Webheath). This would be determined by the scope of the development and the changing demographic. Discussions should take place between developers and Churches Together in Redditch as soon as possible	This is for the church building to decide and submit a planning application for and is not related to the purpose of the HGDS.
Would promote faith based partnership in education. Discussions should take place with regional church education authorities	It is not the within the remit of planning policy to implement initiatives/partnerships such as these.
The options or 'chosen sites' for us to be consulted on are not proper. There should have been opportunity for the people of Redditch to give their opinion on where we could possibly build this number of houses. As it is we have no choice as the chosen sites conveniently give just the right capacity to meet the extra target number of houses.	This is the purpose of public consultation
Too much of the housing plan does not appear to join up with other areas of council work; it doesn't feel coordinated with wellbeing, community safety, transport, reducing carbon emission, young people plans.	The potential development would need to take into account the other policies contained within the Bromsgrove District Plan which is coordinated with Council services and aspirations for the Council.

KEY ISSUE: Evidence base – Housing Growth Development Study

<b>Sub Issues</b>	<b>Officer response</b>
<p>Very well researched and very in-depth</p> <p>Proposals to select Foxlydiat in preference to Bordesley are deeply flawed</p> <p>Recognise the need for additional housing but scale and location is flawed. Needs to be reconsidered and alternatives discussed</p> <p>Why has the latest "Housing Growth Background Document-January 2013" been prepared by in house planners and not independent consultants.</p>	<p>Noted.</p> <p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>Foxlydiat has been thrown into the pot at the last minute without due research, consultation, &amp; consideration. Was not evaluated as part of previous Core Plans</p>	<p>The officers of the Councils are competent and trained and have experience of the areas. WYG second stage report was completed by independent consultants and was largely discredited by the WMRSS Panel report recommendations.</p>
<p>A number of very weak arguments why Area 8 Bordesley – should not be considered. One of them is the people living here will not shop in Redditch. No evidence to show how Officers came to this conclusion. In Redditch there are 3 major supermarket chains (Tesco, Sainsbury, Morrisons) one of which is a stones throw from this site. Redditch has Debenham's, Marks &amp; Spencer's, B&amp;Q, Matalan, and Homebase etc. Seems nonsensical they would travel to Alvechurch or Rowney Green instead.</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p> <p>In any case the two Councils have consulted on this previously in 2010</p>
<p>Report identifying Foxlydiat and Brockhill East as the two most suitable areas files in the face of other detailed reports supported by RBC. On what "balance" has this decision been made? This should be made public</p>	<p>The HGDS at para 6.4.30 only describes the distances to Alvechurch and Rowney Green facilities</p>
<p>Report identifying Foxlydiat and Brockhill East as the two most suitable areas files in the face of other detailed reports supported by RBC. On what "balance" has this decision been made? This should be made public</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. WYG second stage report was completed by independent consultants and was largely discredited by the WMRSS Panel report recommendations. The HGDS has been made public, which is why there are responses</p>

Sub Issues	Officer response
<p>Housing Growth Study (Area 4): Holyoakes Pit (medieval pit/pool is omitted from report but is well documented on maps<sup>2</sup> and historical documents<sup>3</sup>) The pits and the brook are important both in terms of wildlife and rural employment.</p> <p><sup>2</sup> Tithe map 1836, ordnance survey may 1927</p> <p><sup>3</sup> Dickens, M (1931) "Thomas Hollock has a farm by indenture under the conventional seal of Bordesley 4<sup>th</sup> day of February 27<sup>th</sup> Henry VIII" This lease includes the woods, hedgerows, underwoods and pyttes including water in pool meadow and sufficient wood to repair house, hedge, ploughs, carts and waggons.</p>	<p>Noted, In undertaking GI work, the historic environment character zones and the sites heritage assets are considered and constraints for biodiversity will feed into the strategy for GI so that biodiversity gains can be achieved.</p>
<p>Why, strengths under Area 4, have been listed, but have not been listed under the other areas: "Effects of sprawl, encroachment and coalescence and limited" "Could integrate well with existing built form of Redditch" "Improvements to access and facilities could provide benefits to wider 'name of area' area" "More likely to enhance Redditch and Bromsgrove Town Centres than encourage movement northwards" All of the above bullet points could all go under the other areas, so why only list under Area 4? Weaknesses applied to Area 8, e.g. distance to existing services/facilities are just not true.</p>	<p>This is referring to the conclusion of the analysis of area 4, and all sites have the same methodology of proving a conclusion to sum up the analysis of the site. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt, so not all conclusions will be the same.</p>
<p>Under Area 5 "Increased traffic flows on A448, Slideslow roundabout, A38 up to junction 1 with M42" Why under Area 4, have you put "Potential to connect to A448" as a Strength? It should be listed as a weakness the same as Area 5</p>	<p>Para 6/2/47 of the HGDS states "The modelling work concludes that development in Area 5 is likely to exert the main pressure on the A448 (Bromsgrove Highway), the Slideslow roundabout and the A38 running northwards to Junction 1 of the M42. These key locations will require further detailed study to assess the specific impact and mitigation required as a result. Although it must be noted similar impacts are felt from other development scenarios and therefore acknowledging that significant improvements will be required, this impact on highways infrastructure is not seen as a barrier to development at this time." This is not listed as a weakness.</p>
<p>Area 4 needs the Weakness of Area 5 "Education, employment, Town Centre and Batchley not within walking distance" and "Public Right Of Way (PROW)". What about the Bridleways in Area 4. Why</p>	<p>The HGDS acknowledges that with Area 4 (in para 6.1.28) "The Town Centre, including a range of facilities at the Kingfisher Shopping Centre, is approx. 4.7km away. Enfield employment area is located</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>haven't these been listed as a weakness?</p>	<p>approximately 5.5km away. Likely junction improvements on the A448 would increase the overall accessibility of the area, including access to the Town Centre and important employment locations around the town; however access to these facilities would be predominantly dependant on car or bus, without significant improvements to walking and cycling facilities."</p> <p>Bridleways are not a weakness. Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for recreation.</p>
<p>Area 8, states as a weakness "Lack of physical connection to Redditch" The Town Centre is close to the area and easy to access by foot, bike or car. So why has this been listed?</p>	<p>Whilst it is one of the closer areas to the Town Centre, the openness of the Arrow Valley Park to the south of area 8 offers no physical connection to the urban form.</p>
<p>"Distance to existing services/facilities" This is the best area for services and facilities, with the newly build Abbey Stadium Fitness and Leisure Centre with newly build swimming pool on its door step.</p> <p>"Likely to require new, costly, bespoke public transport services" This would be the same for all the Areas, so why has only highlight on this area?</p>	<p>Access to leisure facilities is not the only consideration when evaluating all types of services and facilities.</p> <p>Area 8 would require a new bespoke bus system which would be costly, whereas in other locations existing networks could be enhanced and expanded.</p>
<p>More information needed on the strong and weak boundaries under Area 8 "No strong defensible GB boundary can be identified". Is a road not a strong enough boundary? If it is, why in Area 4 does the boundary cross Curr Lane? A road is a very strong boundary line. What is meant by strong/"defensible boundaries"? The A448 (in current proposals) has conveniently been leapfrogged to locate 2800 houses</p>	<p>The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes and strong or weak boundary. Cur Lane, as a strong boundary connects to adjacent identified strong boundaries.</p>
<p>Area 8 needs more strengths adding: Road infrastructure very good; Larger Area; Potential for more houses when the next housing growth is needed; Closer to motorway networks; Closer to employment opportunities; More likely to enhance Redditch and surrounding areas; Could integrate well with existing and proposed</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>built form of Brockhill; Far less impact on quality of life and well-being, due to less people living in that area, compared to area 4</p> <p>Mentions no 'Rights of Way' as weaknesses for Area 4 yet they exist (Pumphouse Ln to Hilltop and Curr Ln to Birchfield Rd)</p>	<p>These issues have been dealt with in detail in the Area 8 response table.</p> <p>The HGDS does acknowledge the existence of PROW in Area 4 and this could be considered a constraint. However, the weakness identified in Area 5 relates to potential impact on the adjacent historic asset and ecological designations.</p>
<p>Vague in relation to transport infrastructure and road network to support demands of several thousand additional dwellings</p>	<p>Technical work has been carried out by WCC on behalf of BDC and RBC to assess the potential implications of proposed development and to recommend potential transport solutions.</p>
<p>Evaluation of Bordesley site employs unsound methodology and draws false conclusions.</p>	<p>Methodology is consistent across all focussed area appraisals.</p>
<p>It has been suggested by planners that one of the main reasons why Site 1 (Area 4) was selected over Area 8 was that it has stronger, more permanent boundaries i.e. the lanes around the area plus a brook. This type of barrier has been proved by this proposed development that a road presents no more safety from urban encroachment than a so called weak boundary of field hedging. If a Council wants to build on Green Belt land they simply jump over a strong boundary as is the case with Foxydiat Lane in Webheath.</p>	<p>The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes and strong or weak boundary. It is necessary to breach existing strong boundaries on the edge of the urban area in order to identify land for growth.</p>
<p>Many inconsistencies in how each of the areas have been handled. Whole process needs to be revisited and looked at in an unbiased way. Each element is not consistent and scoring unfair. Document is unprofessional and assumes that the general public will not bother to scrutinise it in detail. Obvious that the area preferred was decided before analysis was done and the analysis was then carried out to fit.</p>	<p>Methodology is consistent across all focussed area appraisals. Distance measurements were taken from a central point of each area.</p>
<p>Weaknesses not applied consistently. Area 11 is "unsuited for large scale housing development" which is true of Area 4 but that is not listed as a weakness for Area 4.</p> <p>Area 5 has a listed weakness of "Education, employment and town centre not in walking distance".</p>	<p>Not true. Area 11 is not considered suitable for housing due to limited ability to contain urban sprawl and more suited to employment uses.</p> <p>Distance to services/ facilities are identified in all focussed areas as weaknesses, with the exception of Area 6.</p>
<p>Can you confirm what route is used to measure the distance to Redditch Centre from Area 8 Bordesley and Area 4 Foxydiat?</p>	<p>Distance measurements for all areas were measured from a central point. This approach was taken to ensure consistency between areas considered.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Report believes that Webheath is suffering in some way and needs services and revitalising and that a sprawling estate is going to improve this. This is a cynical and patronising statement.</p>	<p>Additional development would put undue pressure on existing services and therefore this would require mitigation through the provision of additional services to serve new development.</p>
<p>Growth Report talks about road infrastructure. For Foxlydiat there is no real comment about what's needed apart from possible connection to A448 yet Bordesley states contribution to bypass but funding gap still likely. How can comparisons be made when there is no information?</p>	<p>Supporting information is contained in the background information – Transport Schemes.</p>
<p>Given that different areas had different strengths and weaknesses, how do you transparently pick without measures to compare HGDS 10.2 states "In order to reach the recommendation on the preferred areas all the planning issues must be considered in order to reach a conclusion".</p>	<p>A consistent methodology for all site appraisals enables a balanced conclusion to be reached. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>Given Area 4 and Area 8 are the only two options capable of taking over 2000 why was area 8 included in only one of the combination scenarios, when area 4 was included in all the others? Again this suggests bias.</p>	<p>The scenarios were selected based on the analysis in chapter 6 and the summary of the SA in chapter 7 of the HGDS.</p>
<p>No explanation within the HGDS or SA of why/how the particular scenarios were identified in combination for appraisal. Why was reduced site on Area 8 not considered? Scoring like this may have elevated it</p>	
<p>Findings not independently ratified so the study is based on insufficient research, bias and lack of evidence.</p>	<p>The officers of the Councils are competent and trained and have experience of the areas. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. WYG second stage report was completed by independent consultants and was largely discredited by the WMRSS Panel report recommendations.</p>
<p>Distance from Commerce and Industry: The use of unsubstantiated timings in document/Timings in the HGDS for travel to Redditch from Area 4. Document mentions a time of 5 minutes travel, this is purely</p>	<p>Approximate travel times have been used.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>a finger in the air, it is not supported by actual speed of travel, traffic or weather conditions.</p> <p>Impact on A448 is underplayed for the Foxlydiat site where it is the only main road, and over played for Brockhill and the North where commuter traffic would flow via three main roads (A448, A441, A435).</p>	<p>Para 6/2/47 of the HGDS states "The modelling work concludes that development in Area 5 is likely to exert the main pressure on the A448 (Bromsgrove Highway), the Slideslow roundabout and the A38 running northwards to Junction 1 of the M42. These key locations will require further detailed study to assess the specific impact and mitigation required as a result. Although it must be noted similar impacts are felt from other development scenarios and therefore acknowledging that significant improvements will be required, this impact on highways infrastructure is not seen as a barrier to development at this time."</p>
<p>Unclear from literature that there are significant countervailing factors in favour of Webheath/Foxlydiat.</p>	<p>A consistent methodology for all site appraisals enables a balanced conclusion to be reached. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>Section 6.1.7 states Area 4 is in a medium to high landscape sensitivity risk but in section 6.1.8 it has been demoted to medium sensitivity risk. Other areas were excluded because they were of medium landscape sensitivity hence this displays lack of objectivity and fairness</p>	<p>Para 6.1.7 of the HGDS states that Area 4 is located within a medium to high landscape sensitivity risk. This level of risk is similar to the other areas subject to this Focussed Area Appraisal. No area has been excluded based solely on landscape sensitivity.</p>
<p>Study identifies flood risk on site 1 but survey information required to objectively assess this is conspicuous in its absence</p> <p>6.1.36 Swans Brook, Spring Brook and an un-named watercourse run through the area. Flood zone definition is only available for Spring Brook and some parts of the area along Spring Brook fall within flood zone 2 and 3; however complete flooding data for Area 4 is not available. Sewer flooding was recorded on the area boundary near Springhill Farm, Foxlydiat Lane</p>	<p>A site specific Flood Risk Assessment will be completed to the appropriate standards, in accordance with relevant legislation. Any application for development will be dealt with in consultation with the Environment Agency.</p>
<p>With reference to Objective 12, the people of Bentley have been overlooked and let down by their Council if this development</p>	<p>Quality of life is more than consideration of environmental concerns. The Councils also have a duty to ensure that objectively assessed</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>proposal is allowed to go ahead and the tranquility of this quiet rural settlement is lost</p> <p>Statements lifted from HGDS:</p> <p>“Cur Lane, which bisects the area, could be more appropriate strong boundaries within the area to check urban sprawl”. Note: Curr (not Cur) Lane is a pleasant and well-loved country lane that happens to be our home. Reference to Curr Lane as a tool to check urban sprawl rather than as something of real rural value (to residents and many visitors that enjoy the leisure opportunities that it offers) shows lack of understanding on the part of the Planners.</p> <p>It appears planners have not visited Area 1, if they had done they would realise that the whole of the development is an encroachment into the countryside. I would ask the planners to visit and familiarise themselves with the local environment to produce a credible argument for and against each site.</p> <p>“6.1.65 Regeneration opportunities 6.1.66 There is no urban/derelict land within the area. There are, however agricultural sheds across the area (Photo 56) which could potentially be incorporated into future development schemes.”</p> <p>The agricultural sheds are there for a reason, they support the valuable agricultural economy that is threatened by this proposal and that the planners seem to have overlooked when compiling this study.</p>	<p>housing requirements are met in the Plans, so that peoples need for housing is fulfilled</p> <p>The references to all potential boundaries are consistent in their terminology and use throughout the HGDS are not intended to offend existing residents; however technical planning work still needs to be undertaken to ensure that the Plans allocate sufficient land to meet Redditch’s objectively assessed need.</p> <p>This is not the case, all sites have been analysed and officers have undertaken numerous site visits throughout the preparation of the HGDS. Any development proposed around Redditch would constitute an encroachment into the countryside as there is a need to find Greenfield sites outside of the Borough boundaries.</p> <p>It is appropriate to point out the existence of built development within the site. Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs.</p>
<p>This is a record of information collected from a number of colleagues at the local authority for which I work, suggesting flaws/concerns stemming from the study:</p> <p>Comments collected from Senior Highways Officer:  The Officer questioned the sustainability of a development situated as it is beyond the town boundaries with no significant settlements beyond it and Bromsgrove. Any public transport links that are</p>	<p>There is a need to look beyond the boundaries of Redditch because there is no land available within the boundaries to meet the objectively assessed needs for the Borough. The objective of the HDGS was to find the best site that integrates to the Redditch urban area.</p> <p>The policy states “<i>Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed</i></p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>instigated for this new development (which the Highways Officer present at the drop in session at Lower Bentley Village Hall last month claimed would need to be a 10 minute bus service from Redditch town centre in order to 'promote the vitality of the town centre' ) would be unlikely to be economically viable long term and when the financial assistance from the developer ceases the officer forecasted that the bus service would almost certainly cease unless heavily subsidised by Redditch Borough Council (RBC). Hence this proposal is not sustainable.</p>	<p>through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch's Way in 1." However because Bus Services are operated by private companies, planning policy cannot influence the way they are operated. The Borough Council may choose to subsidise bus services but this is not a determining factor in selecting locations for development.</p>
<p>The Officer questioned at what stage of the development the bus service would be provided. A development of this size will have to be phased; will the bus service be available for the first new residents?</p>	<p>These are details which will be provided when a planning application is being prepared. A travel plan and transport assessment will be produced and the design of the scheme is agreed with the Council and WCC.</p>
<p>Comments collected from Senior Ecology Officer: The isolation of species in Foxlydiate Woods. The physical removal of hedgerows will stop migration of species, fragmenting the habitat and creating a 'zoo' effect. See section 6.1.10 of the report referring to an important wildlife corridor. Item 6.1.14 It has been identified that if Area 4 is to be chosen for development it will be necessary to develop on grasslands which house protected species and that this should be done sensitively. The density of housing required to incorporate 2800 houses onto the area identified will make it impossible to be sensitive to these issues.</p>	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure. This should include a hedgerow assessment, determining which hedgerows are worthy of retention and protection. A species and habitats survey is being undertaken to ensure mitigation and enhancement of biodiversity.</p>
<p>Look at current policies of both Redditch and Bromsgrove around safeguarding our rural landscapes.</p>	<p>The NPPF requires that Councils make plans which meet objectively assessed needs</p>
<p>Proposals that incorporate loss of valuable agricultural land / Green Belt are likely to need to be carried out under license with Natural England.</p>	<p>Natural England have been consulted and have responded to the consultation on Bromsgrove and Redditch plans.</p>
<p>There are many surveys still outstanding and the officer suggested that it was premature to rule out other areas and concentrate on this</p>	<p>The Councils are required to submit plans which are considered to be sound to the SoS with evidence to back up the contents. Relevant</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>area before these studies are carried out and incorporated into the report. Quality evidence is the basis for good decisions. Study fails to illustrate this and conclusions show lack of foundation.</p>	<p>evidence outstanding would be able to either confirm or revise elements of the policy prior to submission.</p>
<p>The officer questioned the methodology used. There are a lot of words but no substance behind them. How did they arrive at these conclusions? Other local authorities employ a transparent methodology whereby all the criteria are assessed, given a score and then laid out in table format before making public.</p>	<p>The consultation material and the SA accompanying the consultation are legally compliant and officers consider the methodology used in the HGDS to be presented in a transparent way.</p>
<p>Interesting statements from National/local policy documents ignored by Council:</p>	
<p>“The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.” (NPPF Page 1)</p>	<p>The HGDS explains that the NPPF has been taken into account where it is relevant to the consultation document.</p>
<p>“Our natural environment is essential to our well-being, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.” (Greg Clark, Minister of Planning - Introductory statement NPPF March 2012)</p>	<p>The introductory statement to the NPPF does not form part of the policy against which planning decision are made</p>
<p>“All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.” (NPPF Page 4)</p>	<p>This requirement of the NPPF has been complied with</p>
<p>When considering edge of centre and out of centre proposals, preference should be given to accessible sites well connected to the</p>	<p>This is related to town centre uses being located within or on the edge of the town centre, so not relevant to the HGDS.</p>

Sub Issues	Officer response
town centre (NPPF Page 8)	
Where is the list of the scoring questions included and excluded for the Areas?	The methodology of the HGDS chose not to include scoring as a way of analysing the sites because it can be interpreted subjectively
To state vaguely that "a combination of Areas 6 and 8 could have a significant harmful impact on the natural landscape" (paragraph 7.22) when a similar statement could be made about other areas, particularly Area 4 (Site 1) which is of higher landscape sensitivity, is more assertion than evidence.	Para 6.1.7 of the HGDS states that Area 4 is located within a medium to high landscape sensitivity risk. This level of risk is similar to the other areas subject to this Focused Area Appraisal. No area has been excluded based solely on landscape sensitivity.
The ridge (boundary 10) is a virtual boundary and a poor barrier to physical encroachment. In this section of Area 4 there is no strong physical/tangible boundary to prevent development sprawling from the upper field to the lower field towards Gypsy Lane. The hedge along the ridge is not continuous and has many large gaps (greater than 50 metres in parts). Neither does the ridge work as strong boundary to prevent "visual encroachment". Development which sits behind the ridge but rises higher than 6 feet can be seen very easily from St Bartholomews Church in Tardebigge, Gypsy Lane, Curr Lane and the middle section of Holyoakes Lane.	Boundary 10 is not just a ridge, there is a hedgerow also and is identified as a strong boundary. The ridge and hedgerow together provide visual containment.
Development at Foxlydiate is contrary to Plan objective 11	A single site cannot meet all 13 strategic objectives
Growth Report has looked deeply into all the sites with an unbiased overall view	Noted.
Growth Report talks about strong defensible boundaries. Surely hedges can be planted to create strong boundaries in Bordesley	The methodology to assess land against the Green Belt purposes and to select defensible boundaries has been derived from an evaluation of other best practice assessments including para 85 of the NPPF: "Local Planning Authorities should... define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
Proposed sites do not meet the Redditch / Bromsgrove strategic objectives: -	The HGDS states at 7.9 "All of the Strategic Objectives would have a positive outcome on development if they were met, as shown by their positive scores (Housing Growth SA main document page 12), but some are more sustainable than others". A single site cannot meet all 13 strategic objectives. There are some sites within the focussed areas which meet the objectives stated. The methodology of the HGDS chose not to include scoring of each site against objectives as
Paragraph 5 - To focus all new development in sustainable locations with suitable infrastructure provision including green infrastructure. Paragraph 6 - To minimise the loss of Green Belt and areas of high	



<b>Sub Issues</b>	<b>Officer response</b>
<p>landscape quality.</p> <p>Paragraph 8 – To ensure that both Bromsgrove and Redditch BC are equipped to mitigate against and adapt to the causes of climate change.</p> <p>Paragraph 10 – To minimise waste and increase recycling, including the reuse of land, buildings and building materials where possible</p> <p>This development will impact all of the above</p> <p>Study stresses the importance of the jointly agreed strategic objectives, yet the choice of Site 1 does not meet any of these with the exception of objective 1 “To provide sufficient homes to meet the housing needs of both Bromsgrove District and Redditch Borough” and 13 “To promote high quality design of new developments and the use of sustainable building materials and techniques” which should be met at any other site or combination of sites</p> <p>You state that the most important strategic objective is: To improve the accessibility of people in both Bromsgrove District and Redditch Borough to employment opportunities and all other facilities and to reduce their need to travel; together with the promotion of safer and more sustainable travel patterns and integration of communities. Little evidence of weight being given to where people will find employment up until 2030.</p> <p>Unrealistic to assume everyone living in Redditch will find employment in Redditch over 20 years. No mention of HS2</p> <p>Report offers only the single solution of developing Site 1 and Site 2 Brockhill East, not providing other options</p> <p>The Study concentrated only on development needs of Redditch. Does not take into account the wider needs of the region</p>	<p>a way of analysing the sites because it can be interpreted subjectively.</p> <p>The objectives have not been prioritised in the HGDS. Where people choose to be employed is not something that can be controlled through planning policy.</p> <p>This assumption has not been made in the HGDS. HS2 is not relevant in determining growth locations around Redditch</p> <p>This is incorrect, all sites have been analysed and scenarios developed in section 8 of the HGDS. It is appropriate at this stage of plan making for the Councils to consult upon a preferred option, which is sites 1 and 2.</p> <p>This is not the purpose of the HGDS.</p>

Sub Issues	Officer response
Exclusion of Webheath ADR from the analysis of Area 3 - of which it is clearly an integral part – is a serious failing of the Study.	The Webheath ADR falls within Redditch and is outside of the boundary where this HGDS focuses.
HGDS does not adequately explain why the impact of large scale development on Site 1 is less negative than in other areas and how the benefits of development there outweigh the disadvantages.	The HGDS is extensive and explains how the conclusions about Site 1 and Site 2 have been arrived at.
Whichever area is chosen needs must be met and they would not have a substantive effect on the preferred choice of area. Assume that this is the reason why there are no comments in the Study about telecommunications, gas and electricity supply networks.	These do not provide a significant constraint to development around Redditch.
Unfortunately that document does not set out statistics on the land areas and capacities in a table, with a breakdown of the sectors of Area 4, save for an incomplete statement in chapter 8.	Capacities will vary depending on the site constraints and further work being completed now will supplement this information; however indicative capacities have been estimated against each scenario presented in Chapter 8 of the HGDS.
Number of spelling and punctuation errors	Noted.
Long, uses jargon and lacks punctuation: makes comprehension even more difficult for non-planners.	
Area 18 not included in Exec summary. Why? Limits appropriateness of choice of sites	This area was excluded from further analysis. The executive summary only provides detail on the focussed area sites.
'chosen areas' implies the decision has already been made	There needs to be a chosen or preferred option presented for consultation at this stage of plan making. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.
The process used to identify additional housing land has been reasonably comprehensive and underpinned by a number of new studies and evidence.	Noted
Welcomes joint working of the Councils in the production of the Study. Welcome the clear, consistent and comprehensive approach this has provided to identification of a preferred location for accommodating needed housing growth.	Noted.
Study provides a clear explanation of the adopted methodology for identifying suitable locations for housing growth.	Noted.

Sub Issues	Officer response
<p>Welcome the use of a tiered assessment approach involving an initial board area appraisal and then a more focused area appraisal of selected sites.</p>	<p>Noted.</p>
<p>At both stages of the appraisal process the historic environment and heritage assets are addressed at an appropriate level of detail drawing on a relevant evidence base.</p>	<p>Noted. The historic environment and heritage assets will be considered further and will feed into the strategy for Green Infrastructure.</p>
<p>At this early stage of the plan-making process the Study contributes to fulfilling the evidence base requirements of the NPPF, as for example at paras 158 and 157 (point 7) and paras 169 and 170 as well as supporting the core planning principle of conserving heritage assets in a manner appropriate to their significance (paragraph 17, point 10).</p>	<p>Noted</p>
<p>Support the use of the Historic Environment Assessments completed for Bromsgrove and Redditch Councils by Worcestershire County Council - these incorporating information held on the Historic Environment Record; and completion of the detailed assessment 'Hewell Grange Estate – Setting of Heritage Assets Assessment' for Site 5, which is informed by the framework set out in English Heritage's guidance on the Setting of Heritage Assets.</p>	<p>Noted</p>
<p>Without viability assessments for two strategic sites it is impossible to know whether or not these sites can sustain the infrastructure requirements proposed such as: - Site 1 including a first school, local centre and associated community infrastructure; - Transport assessments and infrastructure including new and improved accesses, integrated bus services, use of new and existing walking and cycling routes; - Green Infrastructure including maximisation of opportunities for biodiversity and recreation, green corridors along Spring Brook (Site 1) and Red Ditch (Site 2) and the use of Sustainable Urban Drainage (SUD) systems; - High quality design.</p>	<p>Viability testing of the two plans is to be undertaken to inform the next version of the District Plan and Local Plan.</p>
<p>The two sites have been identified without any best practice Landscape/visual assessment of the individual sites or of their relative merits in these terms set against other potential sites.</p>	<p>This is not the purpose of the HGDS.</p>
<p>Whilst the HGDS is essentially a Green Belt review, it takes a generalised view of Green Belt impact to each site. There is much</p>	<p>Under each focussed area appraisal site analysis a section on Green Belt has been included. Under this sub sections on each of the</p>

<p><b>Sub Issues</b></p> <p>emphasis on individual field boundaries to assess where the most appropriate, defensible new Green Belt boundary might lie, but little in the way of a 'high level' analysis of how the overall purposes of the Green belt might be best served through the selection of land for Green Belt release. The different functional attributes of parts of the respective areas are not identified or evaluated.</p>	<p><b>Officer response</b></p> <p>purposes of including land within the Green Belt have been included with an analysis of each focussed site.</p>
<p>Fundamental shortcoming is a blanket 65% conversion factor by HGDS. As a result of RBC's relatively high public open space requirement (it is assumed these would logically be applied by Bromsgrove). On its own, this open space requirement accounts for the vast majority of the 35% gross to net reduction, before any other uses that are to be deducted from the gross site area in each case are taken into account. Area 4 and 6 have a yield that almost exactly matches the 3400 shortfall identified by the consultation. Any slippage in yield from either site has fundamental implications for meeting Redditch's housing requirement.</p>	<p>The discounted land does not relate to RBCs open space requirements, this has not been a factor in influencing the indicative capacities of the sites. There are no factors which would suggest that the capacity of 3400 is not able to be reached by the end of the plan period.</p>
<p>The review of three sites did not fully appraise and consider the vehicular access strategy, the number and locations of access points, whether access strategy is deliverable and then assess the subsequent highway impact based on development.</p>	<p>This was not the intention of the HGDS, however this work is being undertaken to inform the next version of the District Plan and Local Plan.</p>
<p>Assessment of growth areas over reliant on existing facilities rather than considering enhancements each site could deliver.</p>	<p>The policy states that associated community infrastructure is required. Both the distance to existing facilities and the potential for creation of new facilities have been taken into consideration.</p>

**KEY ISSUE: Evidence base – Housing Growth Development Study – Executive Summary**

<p><b>Sub Issues</b></p> <p>In the HGDS Executive Summary the only 'Strengths' in favour of Bordesley are "Potential contribution to Bordesley By Pass (but funding gap still likely)" &amp; "Simpler/cheaper solution to sewerage issues likely". Other significant advantages have disappeared. Weaknesses are magnified, including "lack of physical connection to Redditch" &amp; "distance to existing services/facilities", "likely to require new, costly, bespoke, Public transport services", "flood risk issues".</p>	<p><b>Officer response</b></p> <p>These strengths and weaknesses reflect the discussion included within the HGDS.</p>
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<b>Sub Issues</b>	<b>Officer response</b>
<p>These points are more applicable to Bentley Pauncefoot yet Area 8 has been discounted &amp; Area 4 is under strong consideration.</p>	
<p>Whilst a range of sites are listed with strengths and weaknesses of each, there is no associated cost benefit analysis of each option</p>	<p>This is too detailed for this consultation, and too detailed for an executive summary of the HGDS, which includes sufficient information</p>
<p>Executive summary is contradictory. P.5 – Strengths and weaknesses are totally interchangeable P.8 Conclusions are all one-sided in favour of Bromsgrove</p>	<p>It is not clear what the respondent is referring to as being contradictory. The purpose of the HGDS and its consultation is to find the best sites for growth into Bromsgrove surrounding Redditch in order to meet Redditch's objectively assessed housing requirements, so it is unclear how any statement on page 8 of the Executive summary is favouring Bromsgrove.</p>
<p>While objectives in the introduction to the study are meritable, implementation of objectives in the study is seriously lacking</p>	<p>The Strategy's objectives are intending to be overarching considerations as context for the HGDS. It will be for the policy to ensure that these objectives are implemented.</p>
<p>Support principle one on the importance of comprehensive Green Infrastructure</p>	<p>Noted.</p>
<p>Welcome principles used to evaluate sites at Broad Area Appraisal stage and agree with initially excluded areas (3a, 7 and 18) which appear to us to be unsuitable for inclusion.</p>	<p>Noted.</p>
<p>Agree that there are good environmental and planning reasons for discounting areas 1, 2, 3, 9, 10, 12, 13, 14, 15, 16, 17, 19 and 20 at broad appraisal stage and that the remainder were worthy of additional scrutiny through the focussed area appraisals.</p>	<p>Noted.</p>
<p>Note the methodology used to assess sites in the focussed area appraisals. It has been helpful in highlighting specific areas of biodiversity interest or concern.</p>	<p>Noted.</p>
<p>Exclusion of Area 3a from broad appraisal is unsound. Morton Stanley Park is public open space needed within a town, but the exclusion of a golf course is irrational. The purposes for which the Green Belt can be used include necessary sporting facilities. An 18-hole golf course has substantial land-take and little adverse effect on the openness of the Green Belt. It is a use much more acceptable in open countryside than housing.</p>	<p>It is considered that the towns green spaces, including its golf courses form an important part of Redditch's sports and recreation provision. Part of the Golf course is also covered by important ecological designations.</p>

KEY ISSUE: Evidence base – Housing Growth Development Study – Sustainability Appraisal

<b>Sub Issues</b>	<b>Officer response</b>
<p>SA has been unfairly and inconsistently scored compared with other shortlisted areas. The true score puts Site 1 (Area 4) into a negative sustainability position and should be excluded from consideration for development. (Reference Brooke Smith Planning consultants – BAAG Response)</p> <p>Results of our study show Area 4 is scored unfairly relative to Area 8 (Bordesley). BAAG analysis shows that the actual total score for Area 4 should be -1 rather than +3.</p>	<p>Noted however the approach taken to analysis of each site by the Council is consistent.</p>
<p>Document is subjective so with a different reader other areas would be included (Crabbs Cross, Bordesley). The mitigation for exclusion of area 1 could equally apply to area 4 the only difference being area 4 has a potential developer as does Bordesley.</p> <p>Lack of independent validation is relevant in relation to the SA, the scores across areas show inconsistency, subjectivity and bias. Bentley Area Action Group (BAAG) carried out its own SA, no doubt just as scientific as yours, but they endeavoured to be objective and the scores vary.</p>	<p>There are a number of issues with Area 1 highlighted in the HGDS and the SA which has led to its exclusion. Some sites, or parts of some sites in the focused area had no developer interest.</p> <p>The Councils SA and all evidence will be subject to an examination in public.</p>
<p>Sustainability Appraisal (SA) Non-Technical Summary has no numbered key to the areas and of little help in understanding site selection. Needs further independent review and investigation and needs to be fully referenced so that sources can be checked for bias.</p> <p>To include within the SA (unfortunately not part of the main bulk of the Study), details of retail outlets within c 2km of Area 4 and not to do the same for Area 8 does not allow for meaningful comparisons between the two sites.</p>	<p>The HGDS contains the detail required to understand the site selection. The Councils SA and all evidence will be subject to an examination in public. Officers do not consider there is any bias in any of the documents.</p> <p>The SA is required to be prepared independently of the planning related analysis; however the HGDS is required to, and has taken the SA findings into account when determining the selection of site 1 and site 2. The HGDS contains consistent methodology for assessing distance to facilities and retail which the SA has taken into account in analysing the sites.</p>
<p>WYG SA scores Area 4 as 6 against Area 8's score of 14. This shows Area 8 is much more sustainable than Area 4 and Area 4 has a negative sustainability score, it should be excluded from further</p>	<p>WYG did not assess the same areas as the Council have in this process. In any case WYG second stage report was largely discredited by the WMRSS Panel report recommendations.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>development proposals as were other areas with a negative score.</p> <p>Inclusion of Webheath ADR for development in Local Plan No.4 is not a reason for investigating Area 3. Its poor judgement to make the assumption that the ADR will meet sustainability criteria without further assessment. Given that approximately half of Area 3 comprises the Webheath ADR, the same judgement will apply to the ADR as to the remainder of Area 3. The score against SA objective S5 should therefore be -2, not the -1 suggested. SA objective E9 should be negative (currently 0) as encouragement towards car based travel inferred detracts from the reduction of causes of climate change.</p> <p>SA objective E8 is not scored, as commentary suggests further studies required to assess its impact against the objective. However, there are already known issues relating to the sustainability of potential sewage pumping which will be required from the Webheath ADR site. There is also a known disused sewage treatment plant within Area 3, which may harbour potential hazards requiring further mitigation. These are public knowledge, so not acceptable to comment that related issues would need to be investigated. Known factors could be scored, and they would undoubtedly result in at best a -1, in place of the current</p>	<p>Area 3 was one of the original WYG areas and all of these have been reassessed through the HGDS for consistency. The HGDS does not assess the ADR land within Redditch. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>SA objective E8 is not scored, as commentary suggests further studies required to assess its impact against the objective. However, there are already known issues relating to the sustainability of potential sewage pumping which will be required from the Webheath ADR site. There is also a known disused sewage treatment plant within Area 3, which may harbour potential hazards requiring further mitigation. These are public knowledge, so not acceptable to comment that related issues would need to be investigated. Known factors could be scored, and they would undoubtedly result in at best a -1, in place of the current</p>	<p>Sustainability of potential sewage pumping is not a consideration for E8, which relates specifically to the protection and enhancement of the quality of water, soil and air.</p> <p>It is acknowledged that there is a disused sewage treatment plant within Area 3. However, mitigation measures relating to the disused sewage treatment plant would require further detailed assessment to ensure there is no harm to soil or water quality occurs. Therefore, without this additional work, the scoring of '?' is correct as the rationale to support this (SA p. 11) states "<i>Insufficient information may be available to enable an assessment to be made.</i>"</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Distance from the train station for full area 4 stated as 4km – however, much of the (reduced) area is further (the Town Centre and Train Station are within 50m of each other), so positive scoring against SA objective S3 because its ‘within 4km’ should be adjusted to zero rather than current +1.</p> <p>+2 score for SA objective S5 is of concern. When Area 4 was considered as a whole, its Eastern side was considered 4km from Redditch Town Centre and Train Station, and likely to encourage cars but reduces to 3.5km for reduced Area 4 – despite the Western side being over 6km away – this then is deemed likely to promote sustainable travel patterns. Using flawed distances, as such the score for S5 should be reduced to 0.</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate. The HGDS has consistently used the centre point of each area to measure distances to key facilities and the town centre.</p>
<p>Environmental objective E1 scores -1, although the two SWS’s on site are not mentioned in the commentary. Area 8 matrix commentary includes wording relating to the negative effect development would have on its single SWS, and scores it -2. The E1 score for Reduced Area 4 should be adjusted to -2, or the Area 8 score adjusted to -1 to match Reduced Area 4. Reduced Area 4 has two SWS’s on site, but not referred to in commentary and only scores -1.</p>	<p>The HGDS reflects the existence of SWS in and around Area 8. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>Objective E9 marked +1, related to reducing causes of and adapting to the impact of climate change. Given misleading distances used for proximity to facilities, the potential that the site will not encourage more sustainable travel patterns should adjust this to 0 or -1 as it may increase car usage. This would tie in with scoring for Area 3, partly adjacent to Area 4, and scores 0 on this point.</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate. The HGDS has consistently used the centre point of each area to measure distances to key facilities and the town centre.</p>
<p>Objective EC3 scored +1 in lieu of ‘close’ proximity to NEW College, which is 3.5km. As NEW College lies further from the site than the Town Centre and Railway Station, this is a flawed argument. South Eastern corner of the area may be within this specification, but the majority of the site is between 4km and 6km from the College. A neutral score for the full Area 4 due to lack of employment is just as relevant for the reduced area 4. The score for EC3 should be adjusted accordingly to 0.</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate. The HGDS has consistently used the centre point of each area to measure distances to key facilities and the town centre.</p>



<b>Sub Issues</b>	<b>Officer response</b>
<p>For Area 6 SA objective S5 contradicts the focussed appraisal by scoring +1 for the positive impacts this area promoted for sustainable travel, highlighting inconsistencies in the analysis of the study.</p> <p>For Area 8 Objective S3 for improving the viability and vitality of Town Centres strangely scored -1. Reduced Area 4 scored +1 despite being further from Town Centre facilities.</p>	<p>It is not clear how this analysis and SA scoring is inconsistent with the HGDS analysis.</p> <p>The HGDS explains that Area 4 has multiple routes and accessibility to the Town Centre and this is fairly reflected in the SA scoring.</p>
<p>Although a school is slightly closer to Reduced Area 4 than Area 8 it is oversubscribed. Growth sites are anticipated to incorporate a new First School, which mitigates this. This score should be adjusted to 0.</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>For Area 8 Objective E2 scores -2, with commentary indicating loss of green belt, potential for coalescence with Bordesley and reducing gap between Redditch and Birmingham as reasoning. For Reduced Area 4 only -1 is given, despite the development completely engulfing Foxlydiate, and encouraging coalescence with Tardebigge. Both sites have similar detrimental results and should either adjust Reduced Area 4 to -2 or Area 8 to -1.</p>	<p>The HGDS explains the context to this scoring. Area 8 has not been identified as a preferred location for development. Storage Lane is a strong enough boundary in Green Belt terms but the extent of development would be more than is required before it reaches Storage Lane. The HGDS has identified that there is a lack of strong defensible boundaries south of Storage Lane. Furthermore, development at Bordesley would have a greater impact with respect to 'strategic gap' reduction to the conurbation than development elsewhere. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>For Reduced Area 11 SA Objective E2 scores -2 due to potential coalescence with Bordesley, and reduction of strategic gaps between Redditch /Alvechurch /Bromsgrove /Birmingham. Reduced Area 4 scores only -1 for E2, despite enveloping Foxlydiate and reduce the strategic gap to Bromsgrove more than Reduced Area 11, and promote coalescence with Tardebigge. -2 score for Reduced Area 11 is more relevant for the entire Area 11, but E2 score for Reduced Area 11 should be adjusted in line with other similar comparisons, such as Reduced Area 4, where a -1 score is appropriate.</p>	<p>The HGDS explains why Area 8 is considered to have poor connectivity to the built form of Redditch. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>Area 8 has -2 score for SA objective E3, because the area will not form a logical extension to the existing settlement and potentially block/end the green corridor of the River Arrow valley. Potential for 'logical' extensions to Redditch will always be questionable but no more the case for Area 8 than any other site. Parts to the East of the North-South brook across Area 8 could be removed from Area 8 to</p>	

<b>Sub Issues</b>	<b>Officer response</b>
<p>prevent blocking the valley. Developer proposals to the West do not go across the brook. A reduced Area 8 could have been proposed to mitigate this concern. The score against E3 should be adjusted to -1 instead of the current -2.</p> <p>Score for E1 objective recorded as a single minus, but in the results table, it is scored as -2; the red shaded entry on the corrected table includes the correct figure of -1. (Reduced area 11)</p>	<p>Noted this is an error in the SA and the Reduced Area 11 summary table on page 73 should have scored -1.</p> <p>However, the error in Table 4, p.73 has no consequential effects for the commentary at 4.313 (Conclusion of Broad Area Appraisal). The Scenario Appraisal (Areas 4R, 5, 6 &amp; 11R) (Chapter 5) has no consequential effects for the commentary as a result of the scoring error in Table 4. Furthermore, the Scenario scoring in Table 5, p.92 actually reflects the correct score of -1 (i.e.: -1, -2, -1, -1 = -1.25 average).</p>
<p>For Reduced Area 11 the score for E3 SA objective is -2, despite the fact that the Reduced Area 11 does not infer coalescence with Rowney Green or Aivechurch. Developer proposals are very selective in that they remain contained to the West of the River Arrow and do not extend North beyond Bordesley. If Officers recognised this area as a potential site against the master plans that the developer submitted, then objective E3 could be scored as -1 worst case, to zero, best case.</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>A sustainability appraisal for the combination of the 3 most sustainable sites - Areas 6, 8 and reduced area 11 should be carried out. The existing appraisal for Areas 6 and 8 combined will be revisited, taking into account the corrected scoring factors in the table above, as well as the impact of Area 11.</p>	<p>Appraisal of each site is sufficient. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>S2 Health Provision, Area 8 distance to Alexandra Hospital is mentioned. Area 4 no mention of the Hospital.</p>	<p>These are considered within the HGDS.</p>
<p>S3 No mention of the Sainsbury complex within 2km of Area 8. Whilst for Area 4 both Webheath and Batchley 2.3.km away across the A448 are mentioned.</p>	<p>These are considered within the HGDS.</p>
<p>E3 Area 8 "This area, if developed, will not form a logical extension to the existing settlement" Area 4 "The area has the potential to connect</p>	<p>Agree, this is a conclusion in the HGDS</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>with the existing urban form of Redditch at Webheath”</p> <p>We have considered the Sustainability Appraisal Report and are generally satisfied that it meets requirements for Sustainability Appraisal and Strategic Environmental Assessment and has provided a robust framework for the assessment of the draft Plan, in terms of its consistency with the principles of sustainable development, which has helped to refine emerging policies.</p>	<p>Noted</p>

KEY ISSUE: Evidence base – Severn Trent Report

<b>Sub Issues</b>	<b>Officer response</b>
<p>The Severn Trent report on potential impact of developments made no assessment of surface water drainage. The report stated “...preference would be for development to be located in Bordesley, Brockhill and then Foxlydiate with the least preferable location being in Webheath due to the need to pump or incur a more expensive more sustainable gravity option”</p>	<p>The Severn Trent correspondence to the Councils is not a report as claimed by respondents. Surface water drainage on the sites will be assessed to inform and revise the publication versions of both plans.</p>
<p>Are these reports e.g. ‘STW Foul Water Sewage report (Paul Hurcombe – Dec 2012)’ not being read? Or are they being ignored?</p>	<p>The Severn Trent correspondence to the Councils is not a report as claimed by respondents and this correspondence was requested by the Councils for consideration.</p>
<p>Consult with STW to discuss a timed infrastructure plan and phasing</p> <p>In our drainage overview document (19 Dec 2012) we summarised that sewerage impacts would be minimised if development were allocated to the north of the Arrow valley (closer to the trunk sewers) and development to the west of Redditch (i.e. Webheath/ Foxlydiate) could be problematic to accommodate due to the small size of the sewers. Concern that additional development locations have by-passed the Water Cycle Study process and the 2800 dwellings in Foxlydiate is expected to require extensive sewerage capacity improvements.</p>	<p>Noted, these discussions are on-going</p> <p>The Outline WCS was completed before the cross boundary locations were analysed so they would not be included. STWL are completing more work to understand the costs of solutions for a range of scenarios. Regardless of this, STWL have a duty to enable connection to water supply, and for disposal of waste water for treatment.</p>
<p>For Site 1 whilst it's the developer's responsibility to construct and pay for the pumping station and on-site drainage, maintenance and running the pumping station will transfer to Severn Trent. Pumping is a less environmentally sustainable option due to on-going electricity</p>	<p>STWL have met with the Councils and it is understood that the maintenance is not a constraint to development</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>requirements and associated carbon impacts.</p> <p>Sewer capacity improvements will be required to the existing small diameter sewerage system upstream of the Arrow valley (as indicated in the Water Cycle Study and the WYG report). Until more detailed hydraulic modelling is undertaken we are unable to confirm the extent of any capacity improvements required to ensure flood risk is not increased. Subject to resolving sewerage capacity issues, we do not expect there to be sewerage treatment issues at Spernal sewerage treatment works but the key concern is the ability of the sewerage system to accommodate the additional flows.</p>	<p>Noted however STWL are completing more work to understand the costs of solutions for a range of scenarios.</p>
<p>There is a potential option to drain the site south by gravity to a treatment works at Priest Bridge. This option will require a new 2km long gravity sewer to connect to the existing gravity sewer running along the Bow Brook valley, plus potential capacity improvements to the existing 7.2km sewer to Priest Bridge Sewage Treatment Works. As part of a developer enquiry relating to the Webheath ADR site we have notionally looked at this option but initial estimates indicate this will require approximately £2.5m of sewerage improvements and Priest Bridge Sewage Treatment Works will also require additional treatment capacity.</p>	<p>Noted, STWL are completing more work to understand the costs of solutions for a range of scenarios.</p>

KEY ISSUE: Evidence base – Transport Study

<b>Sub Issues</b>	<b>Officer response</b>
<p>Survey was carried out when schools were on holiday and during an off peak time.</p>	<p>It is not clear what surveys are referred to here. Any traffic survey data provided to WCC must be collected within a neutral month as per Department for Transport guidance.</p>
<p>Welcome the reference to impacts on surrounding highway network being examined and mitigated</p>	<p>Noted</p>
<p>WCC has provided evidence to HA to assess impact of proposals on the SRN and this is in early phases. This will highlight required mitigation and issues around funding which is a pre-requisite for the Plan (Due End July)</p>	<p>Noted</p>
<p>Development must contribute towards improvements to the A38</p>	<p>Noted</p>

Sub Issues	Officer response
<p>through WCC.</p> <p>The following sites are cheapest to develop (confirmed by WCC) - ascending in cost order – Griffon Studley, Mappleborough Green, Bordesley, Brockhill, Foxydiat and Webheath.</p>	<p>It is not clear where this information has come from and therefore what the costs are based on. The cost of development is one consideration when selecting appropriate development sites. The key issue is that individual development sites are viable for development.</p>
<p>Strongly object to the biased Taylor Wimpey (application no. 2012/207/OUT) MEC Transport Assessment (2012) being used as 'INDEPENDENT' evidence for this process to justify building 600 (Webheath ADR) and 2,800 (Foxydiat).</p>	<p>This was submitted with the planning application and was not used as evidence to inform the HGDS.</p>
<p>After reading the 242 page consultation study the planners do not appear to have carried out sufficient traffic studies of what effect this will have on the local Bromsgrove community. What traffic studies been commissioned on local lanes?</p>	<p>Supporting information is contained in the background information – Transport Schemes.</p>
<p>The Bromsgrove District Infrastructure Delivery Plan March 2013 by Halcrow gives costs associated with Improving Bus Service Provision across Bromsgrove District and Redditch Borough. There does not appear to be any background detail to this information and this would be required in order to give an analysis of these figures.</p>	<p>The bus costs provided relate to the annual costs of operating the specified level of bus service. This takes account of staff costs and vehicle operating costs, i.e. gross costs before revenue. The net costs (after revenue) would be lower.</p> <p>WCC LTP3 policy and the Bromsgrove and Redditch Transport Network Assessment and Mitigation Reports (TNAMR) outlines that there will be a requirement for a high frequency bus service from the development linking it to key destinations and interchanges. In the event of the development proceeding to Planning Application stage (and as set out in the Worcestershire LTP3), as part of the development control process the developer of the site will be expected to submit a 20 year business case outlining the financial support required from the site to sustain a service. The developer will be required to set this out in their Transport Assessment submitted in support of any Planning Application. These proposals will be considered by the Highway Authority as part of their assessment of the proposed development.</p>

KEY ISSUE: Evidence base – WYG2 Report

<b>Sub Issues</b>	<b>Officer response</b>
The White Young Green Report (WYG2) actually highlighted Bordesley as the preferred area for development.	WYG Second stage report was largely discredited by the WMRSS Panel report recommendations
Why is WYG2 being ignored?	
The pros for this site certainly outweigh the cons.	

KEY ISSUE: Evidence base – SHMA

<b>Sub Issues</b>	<b>Officer response</b>
Concerns about the independence of the population data. The report on which housing need has been assessed appears to have been submitted by a property consultancy who could potentially have vested interests. Taking these factors into account I am concerned about the validity of the policy produced to deliver these developments.	The SHMA was carried out by planning consultants who have specialist experience in producing this type of assessment and no vested interests. The data has been extracted from ONS projections which is a standard methodology used Nationally.
It is considered that, with a reconsideration of: <ul style="list-style-type: none"> <li>- the excluded SHLAA sites;</li> <li>- proposed housing densities;</li> <li>- the employment sites portfolio; and</li> <li>- the imminent office to residential permitted development changes,</li> </ul> it will not be necessary to provide the level of housing currently being proposed for areas outside of Redditch.	This has been undertaken through annual updates to the Redditch SHMA and ELR. Densities proposed on SHLAA sites reflect the local character of Redditch and make the most efficient use of the land. The PD rights permitting change of use from office to residential is unlikely to yield significant levels of residential development.
Given that there is evidence of migration from both Birmingham and the Black Country into Bromsgrove, two key issues need to be addressed under the Duty to Cooperate as the plan emerges.	Noted this is being considered by the Councils.
Policy 4 sets out a locally derived requirement for 6,380 dwellings between 2011 and 2030, equivalent to 336 dwellings per annum. This is arbitrarily low compared to the economic growth-based requirement of 8,620 dwellings identified by the February 2012	Disagree, the level of growth proposed meets objectively assessed housing requirements. The SHMA presented a spectrum of potential future outcomes for consideration in the development of locally appropriate policy. The employment-constrained scenario was one of

<b>Sub Issues</b>	<b>Officer response</b>
<p>SHMA. It has not been aligned to any economic growth projections. It is therefore unlikely to reflect true housing needs. Housing requirements must be set in accordance with paragraphs 158, 159, 152 and 14 of the NPPF</p>	<p>these. RBC chose to meet its natural growth (migration-led scenario) as opposed to encouraging in migration associated with employment driven scenarios, which result in a higher population and subsequently, a higher housing requirement, but this is not an arbitrary requirement, it is objectively assessed and meets identified need.</p>
<p>ONS recently issued interim-2011 based household projections. These should be used with some caution, as they are interim and likely to have been influenced by short term issues affecting the housing market and economy. When these issues ease household formation rates are likely to return to a pre-recession trajectory over the longer term. The projections only cover the period 2011-2021 and are unlikely to reflect predicted requirements across the whole plan period.</p>	<p>Noted, the 2011 based projections came in advance of the 2012 SHMA projections.</p>
<p>In relation to the housing backlog, Many authorities have consistently under-provided housing against targets in the adopted RSS. These were subject to significant scrutiny and were found to be based on robust evidence. If the LPA has not provided sufficient homes to meet its RSS target, there is a need to ensure requirement in the forthcoming Plan includes an element to address this backlog. Under supply of housing against the RSS target of 350 dpa in Redditch equates to a shortfall of 952 units for the period 2006/07-2011/12. Council's evidence indicates that this backlog is not factored into proposed housing requirement. Unmet need will not just disappear. Failure to include past shortfall in housing delivery is unsound. Shortfall should be made up within the first 5 years of the plan.</p> <p>The preferred overall housing requirement is likely to significantly constrain the scope for addressing affordable housing needs in the area.</p> <p>This approach will put the authority back in control of planning in their area and will give the Members comfort and certainty over the level and location of development that will take place over the lifetime of the Plan.</p>	<p>There is no backlog or under provision. The original RSS plan period would have run from 2006 to 2026. As such, some of the BORLP3 completions would have counted both within its time frame and within that of BORLP4. The Local Plan period will now run from 2011 to 2030. BORLP3 Plan period ran from 1996 to 2011, thus resulting in no overlap of Plan periods/ completions.</p> <p>Any under provision within the Plan period will be dealt with in the Five year housing land supply document.</p>
<p>The preferred overall housing requirement is likely to significantly constrain the scope for addressing affordable housing needs in the area.</p> <p>This approach will put the authority back in control of planning in their area and will give the Members comfort and certainty over the level and location of development that will take place over the lifetime of the Plan.</p>	<p>The Redditch housing requirement has been determined to meet objectively assessed housing need and it is accepted that it will not be possible to meet all demands for affordable housing.</p> <p>Noted</p>

KEY ISSUE: Evidence base – Historic Environment Assessments

<b>Sub Issues</b>	<b>Officer response</b>
<p>HEA should be referred to when assessing the potential growth areas All the potential Growth Areas in Worcestershire have high sensitivity to change. Some already contain known and nationally important heritage assets. All areas have a high potential for containing previously unrecorded remains.</p>	<p>The HEA was considered when preparing the reports. It is agreed that all these areas are highly sensitive to change.</p>
<p>Initial opinions is that the most sensitive areas are 1, 2, 4, 5, western half of 11</p>	<p>Agreed, but would include 3, 9 and 10</p>
<p>Least Sensitive areas 3, 4, 6 and 8, eastern half of 11</p>	<p>Would disagree in respect of 3 and 8, 4?</p>
<p>Area 1 is covered by 2 Historic Environment Character Zones HECZ141 (Astwood Hill and Ham Green) and HECZ142 (Astwood Farm and Dagtail End). There is 1 SAM and 4 Listed Buildings. The western 2/3 of area falls within eastern part HECZ141 and contains the Scheduled remains of Hunt House Moat. This site also includes a grade II listed building, making this area highly sensitive to change. The setting of the monument and listed buildings should be a key consideration in assessing the suitability of Area 1 for growth.</p>	<p>Agreed, although there are 5 listed buildings.</p>
<p>Area 2 is covered by 2 Historic Environment Character Zones HECZ 141: Astwood Hill and Ham Green and HECZ 146: Callow Hill to Cruise Hill. There are 13 listed buildings. The Scheduled remains of Hunt End about the NE corner of this growth area and therefore would impact on the SAM and listed buildings setting.</p>	<p>Comments noted, although there are 12 listed buildings.</p>
<p>Area 3 is covered by 2 Historic Environment Character Zones HECZ 146: Callow Hill to Cruise Hill and HECZ 147: Upper Bentley. There are 5 listed buildings.</p>	<p>Comments noted and agreed.</p>
<p>Area 4 is covered by 1 Historic Environment Character Zones HECZ 147: Upper Bentley. There is 1 listed building. The northwest corner of growth Area 4 abuts the Conservation Area of Hewell Grange.</p>	<p>Comments noted and agreed.</p>
<p>Area 5 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are 5 listed buildings, 1 conservation area and 1 registered park and garden. The north western area of Growth Area 5 lies within the</p>	<p>Comments noted, although there are 17 listed buildings within the Area.</p>



<b>Sub Issues</b>	<b>Officer response</b>
Hewell Grange conservation area and Registered Garden. The listed buildings are all within a cluster at Hewell Grange.	
Area 6 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are no designated assets.	Comments noted and agreed.
Area 8 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are 6 listed buildings.	Comments noted although there 7 listed buildings within the area.
Area 9 is covered by 2 Historic Environment Character Zones HECZ: 133: Holt End to Weatheroak Hill and HECZ 165: The Heaths. There are 12 listed buildings and 1 conservation area. The southern edge of Area 9 contains Holt End Conservation Area, while the south western corner overlooks the Scheduled remains of Beoley Mount.	Comments noted, although the conservation area is known as the Beoley Conservation Area.
Area 10 is covered by 2 Historic Environment Character Zones HECZ: 133: Holt End to Weatheroak Hill and HECZ 165: The Heaths. The northern edge of Area 10 contains Holt End Conservation Area, while the far western corner contains the Scheduled remains of Beoley Mount.	Comments noted and agreed.
Area 11 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are 5 listed buildings and 1 conservation area. The Worcester and Birmingham Canal Conservation Area transects Growth Area 11 and the south western side abuts the Hewell Grange Conservation area.	Comments noted and agreed.

**KEY ISSUE: Evidence base – NPPF**

<b>Sub Issues</b>	<b>Officer response</b>
NPPF states there should be 'Consent of local communities' in these decisions. I am yet to meet anyone who lives in the proposed development area who has given their consent (or even a reluctant acceptance) to this proposal.	This is not contained within the NPPF.
Although on first viewing the Councils cross boundary policy appears to be very acceptable I believe that the NPPF on which it is based is	It is not for the HGDS to question the NPPF; respondent should take this up with DCLG directly.

<b>Sub Issues</b>	<b>Officer response</b>
<p>a flawed document. I believe that the National Planning Policy Framework, which came into effect last year, is too vague and unspecific in its aims and objectives and can too easily be manipulated to suit the whim of the local authority.</p> <p>The NPPF requires 5 years' worth of housing land. 2030 is 17 years away. What is the urgency with allocating Foxlydiate?</p>	<p>The NPPF requires a 5 year supply of land to be available for immediate delivery. The NPPF also requires that plans are prepared for an appropriate time scale, preferably 15 years from adoption. Hence the preparation of a Plan now up to 2030 – adoption in 2014 would require a Plan's forward projection to at least 2029. At the moment, not all of the sites identified within Redditch are immediately available and as such, Redditch cannot demonstrate a 5 year supply of deliverable land. There isn't a hidden agenda to build 6400 dwellings by 2030; this is the overall need up to the end of the Plan period.</p>

**KEY ISSUE:** Evidence base – Joint Climate Change Strategy and Action Plan

<b>Sub Issues</b>	<b>Officer response</b>
<p>Joint Climate Change Strategy and Action Plan produced by Bromsgrove District and Redditch Borough Councils (2010-2013) points out the following:</p> <ul style="list-style-type: none"> <li>• The central estimate of change in winter mean precipitation is 18%; it is very unlikely to be less than 3% and is very unlikely to be more than 39%. By 2020, on average, there will be 6% more winter precipitation than we are used to.</li> <li>• In Bromsgrove and Redditch, the most significant problems will be more serious water stress and overheating. Rainfall is projected to decrease during the summer and increase during the winter months, with an increased risk of more intense events which will increase the risk of fluvial and surface water flooding and parts of the drainage system is prone to being over-whelmed during heavy rainfall.</li> </ul>	<p>PPS 25/ NPPF requires that surface water run-off cannot be higher than the greenfield site at present, and should aim to improve current rates.</p> <p>A flood risk assessment of the site will determine how this can be achieved for this site.</p>

<p>However, recent events have suggested that both summers and winters may have more rainfall in future. It is expected that the flow of water into Bow Brook will increase without the additional risk caused by these proposed developments.</p>	
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KEY ISSUE: Evidence Base – 2010 Joint Consultation

<p><b>Sub Issues</b> The development of Bentley Green Belt is in direct contradiction to your previously stated policies, strategies &amp; objectives.</p>	<p><b>Officer response</b> The Joint consultation in 2010 did include a wide swathe of potential development areas across north and west Redditch, including parts of Area 4.</p>
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# **Bromsgrove District Plan 2011-2030**

**(Proposed submission version)**

DRAFT

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## **1. Introduction and Context**

### **Background**

1.1 The purpose of the Bromsgrove District Plan (BDP or The Plan), is to set out the long-term vision for how Bromsgrove town, the villages and countryside will develop and change in the period up to 2030. The Plan will set out how this vision will be delivered through a strategy of promoting, distributing and delivering sustainable development and growth.

1.2 Preparation of The Plan began following the Planning and Compulsory Purchase Act in 2004 and was then set within the context of the West Midlands Regional Spatial Strategy (now revoked) with its emphasis on urban and rural renaissance. The original Plan was called the Core Strategy and was focused on meeting local needs and aspirations through local engagement, but with a strategic perspective and responsibility. This Plan has been developed in the light of the changing political and legislative landscape of regional and local planning, including the Localism Act 2011, the National Planning Policy Framework 2012 and the introduction of the Duty to Co-operate. The work that was progressed under the Core Strategy forms the basis of this Plan.

1.3 The Council no longer proposes to prepare a separate Area Action Plan (AAP) for the Town Centre. A draft AAP was consulted on at the same time as the Draft Core Strategy 2 in 2011. It has now been decided to incorporate the more detailed key policies proposed in the draft Town Centre Area Action Plan into the District Plan so that all of the important policies affecting the District are contained in one document.

1.4 The Plan's strategy promotes economic and job growth in the District and provides for new housing to meet the District's needs, as well as land for other activities including retail, sport and leisure. The strategy aims to conserve and improve the character and quality of the environment which is an important component of the District's attractiveness to investment and success.

1.5 The Plan reflects national and local aims for reducing carbon emissions. It also contributes to the Council's agenda of improving the quality of life and health of the residents of Bromsgrove which is set out in the Bromsgrove Priorities section of the Single Sustainable Community Strategy for Worcestershire 2011-2021. The Plan will be the starting point for the development of Neighbourhood Development Plans by local communities and for decisions on all new development proposals.

1.6 The Council has a statutory duty to prepare, monitor and review a Development Plan for the District. The Plan will replace the saved policies



from the current Development Plan, the Bromsgrove District Local Plan, (Adopted 2004) as set out in Appendix IV.

## Content

1.7 The Plan includes:

- A **District Profile** which describes Bromsgrove as it is at the moment and influences on this
  - The **challenges** facing Bromsgrove that the Plan can help to address and the **objectives** for addressing these challenges
  - A **vision** of how the District could develop as a place to meet the needs of its local residents, businesses and visitors in the future
  - A **strategy** to direct growth to sustainable locations
  - A set of **Policies** to deliver the strategy
  - A **monitoring and implementation framework** for delivering the Plan.
- The Plan is supported by a draft Infrastructure Delivery Plan (IDP) which attempts to show how the proposed development may be delivered. The IDP is at present in draft and as a 'live' document will be updated before Submission of the Plan. The draft IDP can be found as a separate document.

## What has influenced this Plan

1.8 The Plan is founded on:

National and local planning policies, including:

- The National Planning Policy Framework
- Waste Core Strategy for Worcestershire adopted 2012
- Sustainable Community Strategy
- National imperative of economic growth and sustainable development
- Other relevant plans, policies and strategies that relate to the District or the wider area

1.9 Evidence from a number of studies about the District, including but not exclusively:

- Employment Land Review 2008/2012
- Strategic Housing Market Assessment 2012
- Strategic Housing Land Availability Assessment 2013
- Gypsy and Traveller Accommodation Assessment
- Strategic Flood Risk Assessment levels 1&2 (2008 and 2012)
- Water Cycle Study 1 and Outline (2008 and 2012)
- Settlement Hierarchy Study 2012
- Green Infrastructure Study 2012
- Retail Study 2013
- Viability Assessment 2013?
- Annual Monitoring Reports ongoing

1.10 Recommendations from appraisals and assessments:

- Sustainability Appraisal (SA) of the objectives, strategy, policies and sites which highlighted potential conflicts or areas where the plan could be improved, and ensures that the Plan accords with the

principles of sustainable development. The SA process also incorporates a Strategic Environmental Assessment (SEA). The SA has been integral to each stage of the plan making process.

- Habitat Regulations Assessment of the impact of the strategy and policies on the network of sites of European importance for nature conservation,
- Equalities Impact Assessment of the impact of policies on specific groups, as a result of race, gender, sexual orientation, disability, age or religion

1.11 Involvement of key stakeholders and local communities, including consultation on:

- Issues and Options- 2005
- Issues and Options- 2008
- Redditch Growth joint Consultation- 2009
- Draft Core Strategy - 2010
- Draft Core Strategy 2 – 2011
- Housing Growth Joint Consultation 2013
- Bromsgrove District Plan (2011-2030)- 2013 Proposed submission Version (current)

1.12 A summary of the consultation carried out and how it has influenced the Plan is contained in the Consultation Statement which is a separate evidence base document. A brief summary of the key consultation issues is detailed in each policy under the sub heading of Consultation feedback.

### **Duty to Co-operate (DTC)**

1.13 The BDP takes into account the implications of planning policies of neighbouring authorities as spatial planning should not be constrained by Local Authority administrative boundaries. The District Council has consulted neighbouring authorities at all stages in the preparation of the Plan and will continue to do so as necessary and in particular on strategic cross boundary matters. The DTC has now become a legal duty in plan preparation. The 2012 Regulations set out which bodies the DTC applies to and the NPPF describes the issues which it should address.

1.14 The District Council and Birmingham City Council have jointly prepared an Area Action Plan for Longbridge which was adopted in April 2009. Both Councils also continue to engage on Birmingham's unmet housing need which may require the identification of potential sites in Bromsgrove in the later stages of the Plan period. A housing study is currently being carried out across the whole of the Greater Birmingham and Solihull Local Enterprise Partnership area which will provide some of the evidence required for this issue. The Local Enterprise Partnership (LEP) is discussed in more detail below at paragraph no 1.17.

1.15 The District Council and Redditch Borough Council continue to liaise closely to prepare the new local plans for each independent Local Authority area and build a robust evidence base, jointly where appropriate, in order to make the most efficient use of resources and where this makes sound planning sense. This joint working has also included Stratford on Avon

District Council in order to resolve the unmet employment needs of Redditch.

1.16 A separate document concerning the Duty to Cooperate forms part of the evidence base supporting the Bromsgrove District Plan.

### **The Local Enterprise Partnership**

1.17 Bromsgrove is a member of two LEPs, namely the Greater Birmingham and Solihull LEP (GBSLEP) and the Worcestershire LEP (WLEP).

1.18 The GBSLEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. The role of the GBSLEP is to create and support a globally competitive knowledge economy, ensuring the LEP area is recognised as the natural home for Europe's entrepreneurs and wealth creators.

1.19 The WLEP is a business led partnership of local councils, local business, trade organisations and the voluntary sector. Its task is to develop the best business environment for the county; encourage inward investment; stimulate the local economy; identify appropriate projects for funding and promote Worcestershire as an exceptional place to work, live and prosper. The LEP's vision is "to create the right economic environment to inspire businesses, encourage investment and to create lasting and sustainable employment in Worcestershire by 2017 and beyond."

1.20 Whilst the LEP's operate at a more strategic level, policies contained within the BDP need to be consistent with the visions, aims and objectives of the LEP's and where possible contribute towards achieving some of the objectives of the LEPs.

### **What happens next?**

1.21 The Bromsgrove District Plan (Proposed submission) will go out to publication for the statutory 6 week period, during which time representations from all interested parties on issues of soundness will be welcomed. All of the main issues raised will then be summarised and responded to.

1.22 In due course the final version of the plan will be submitted to the Secretary of State and the submitted document will be made available for another consultation period, during which time formal representations on soundness can be made.

1.23 Once submitted, the BDP will be subject to independent examination to ensure the Plan is sound and for compliance with Duty to Cooperate, legal and procedural requirements. Soundness of a Plan is defined in the NPPF as being "positively prepared, justified, effective and consistent with National Policy".

'Positively prepared' means that the Plan must:

- Meet objectively assessed development and infrastructure requirements
- Be consistent with achieving sustainable development

'Justified' means that the document must be:

- Founded on a robust and credible evidence base
- The most appropriate strategy when considered against the reasonable alternatives

'Effective' means that the document must be:

- Deliverable
- Based on effective joint working on cross-boundary strategic priorities

1.24 All Local Plans will be tested to make sure that they are legally compliant. They must:

- Be prepared in accordance with the Local Development Scheme (a timetable) and in compliance with the Statement of Community Involvement (SCI) and the relevant local planning Regulations;
- Be subject to Sustainability Appraisal meeting the requirements of the Strategic Environmental Assessment Directive;
- Have regard to national policy in the NPPF;
- Have regard to any Sustainable Community Strategy for its area.

1.25 The submitted document will then be considered at an Examination in Public to be conducted by an independent Inspector who will determine whether the plan is sound.

### **Can I still get involved?**

1.26 The preparation of the Plan has been progressing for some time and you may already have been involved in earlier consultation periods. The Plan includes a summary of key issues from previous consultations and describes how this has influenced the Plan. Whether or not you have been involved in any of these earlier stages however, there is still the opportunity for you to be involved by commenting on the soundness of the Plan as detailed above.

1.27 Publication of the Proposed Submission version of the District Plan is timetabled for **30<sup>th</sup> September 2013** and the publication period will run **for 6 weeks**. We will need to consider all of your representations on soundness before a final submission version can be issued and therefore if you have any comments on soundness they must be received by the District Council by **5pm on Monday 11<sup>th</sup> November 2013**.

Please send the completed form to:

The Strategic Planning Team,  
Planning and Regeneration,

The Council House,  
Burcot Lane,  
Bromsgrove,  
Worcestershire,  
B60 1AA

Or alternatively email a copy of the completed response form to  
xxxxxxxxxxxxxxxxxxxx

To find out more about the Bromsgrove District Plan (2011-2030) Proposed submission Version you can visit the Council's web page at [www.bromsgrove.gov.uk/strategicplanning](http://www.bromsgrove.gov.uk/strategicplanning)

Alternatively you may wish to speak to an officer on 01527 88xxxx.

## 2. District Profile

2.1 Bromsgrove District is situated in north Worcestershire and covers approximately 21,714 hectares. Although the Town is located only 22km (14 miles) from the centre of Birmingham, the District is predominately rural with approximately 91% of the land designated Green Belt.

2.2 The area is well served by motorways, with the M5 running north to south and the M42 from east to west. The M5 and M42 connect with the M6 to the north of Birmingham and the M40 to the east. The District also benefits from train and bus connections into Birmingham City Centre and the wider region.

2.3 The main centre of population in Bromsgrove District is Bromsgrove Town with other larger centres being Alvechurch, Barnt Green, Catshill, Hagley, Rubery, and Wythall. A series of smaller rural villages and hamlets are spread throughout the District<sup>1</sup>. Development pressures are high due to the District's proximity to the Birmingham conurbation and the motorway and railway connections.

### **Economic Characteristics**

2.4 Once a prosperous hub for the woollen trade Bromsgrove became a centre for nailmaking in the 19th century and more recently won prominence for engineering and the motor industry. Bromsgrove Town Centre itself is a historic settlement which was mentioned in the Domesday Book, and was involved in the medieval wool trade together with other Worcestershire settlements. Whilst performing the role and function of a non- strategic centre, the Town Centre has the potential for enhancement and regeneration to enable it to better perform this function for the greater benefit and inclusion of local residents and visitors.

2.5 The 2011 Census shows in Bromsgrove 71.8% of people aged 16-74 were economically active, compared with 71.3% in Worcestershire and the average across England of 69.9%. This is a total of 48,664 economically active residents of which 2,070 (3.1%) are unemployed. This compares favourably to a West Midlands unemployment rate of 5.1% and 4.4% nationally. 39.4% of people worked full time, and 15.3% part time; this

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<sup>1</sup> Settlement hierarchy detailed in BDP2 Settlement Hierarchy

compares with 39.2% and 14.9% in Worcestershire. 16.3% of people in Bromsgrove aged 16-74 were retired, compared with 16.0% in Worcestershire, and the figure for the whole of England of 13.7%.

2.6 The dominant industries in Bromsgrove District, in terms of the percentage of employees, are (14.5%) in the Wholesale and retail Trade; Repair of Motor Vehicles and Motor Cycles sector; 14.1% in human health and social work activities; and 11.7% in Education. The District has a job density i.e. the numbers of jobs per resident aged 16-64 of 37,000.

2.7 Household incomes in Worcestershire are higher than they are elsewhere in the West Midlands and nationally. In Bromsgrove the proportion of households earning less than £10,000 a year is 10.9%, whilst the proportion in Worcestershire is 13.4%. The average household income in Bromsgrove is £41,354; in contrast the average is £36,979 in Worcestershire, and £36,357 in England (CACI, 2012).

Table 1

Annual Average Earnings for all Employees by District (2012)			
District	Residence based earnings	Workplace based earnings	% Difference
Bromsgrove	£29,552	£20,697	30.0
Malvern Hills	£24,288	£22,411	7.7
Redditch	£21,934	£22,454	-2.4
Worcester City	£26,478	£23,770	10.2
Wychavon	£26,725	£24,345	8.9
Wyre Forest	£20,842	£18,658	10.5
Worcestershire	£25,330	£22,685	10.4

Source: Annual Survey of Hours and Earnings 2012(ONS)

2.8 As table 1 above indicates, workplace earnings are lower in general than residence-based earnings across Worcestershire, with the exception of Redditch. The biggest differential can be seen in Bromsgrove where, the average (mean) annual earnings of people who work within the District is £20,697 compared with the average annual earnings for residents of Bromsgrove District, which is £29,552, a difference of 30% (ONS, 2012). This would suggest that the District's population earn higher salaries than average, but they earn them in employment locations outside the District. Due to Bromsgrove's close proximity to the MUA, many residents commute to jobs in and around Birmingham. Therefore, it appears that there is an

imbalance between the types of jobs and pay available within Bromsgrove compared with the average wages of the population. Industries with higher paid jobs need to be encouraged to stay or locate in the District to correct this imbalance and reduce the daily flow of the population to other employment centres which is unsustainable (ONS, 2012). It would appear that further development in high tech manufacturing and knowledge based industries is required to redress the imbalance. The Bromsgrove Technology Park has been established but is not yet operating at full capacity. Industries with higher paid jobs need to be encouraged to stay or locate in the District to correct this imbalance and reduce the daily flow of the population to other employment centres which is unsustainable.

2.9 There are two major areas of economic concern requiring regeneration within the District – Bromsgrove Town Centre and Longbridge. Following the adoption of a joint Area Action Plan between Birmingham and Bromsgrove in 2009, Longbridge regeneration is now underway. A draft Town Centre Area Action Plan was previously consulted upon, however key town centre regeneration policies have now been incorporated into this Plan. The Town Centre's regeneration is currently underway and policies contained within this Plan are designed to perpetuate this process.

### **Social Characteristics**

2.10 The 2011 Census shows that Bromsgrove District had a resident population of 93,637, 19,019 of them were aged 17 or below, representing almost 20.3% of the total population in Bromsgrove. There were 19,135 aged 65-plus living in the District, almost 20.4% of the total population.

2.11 The number of children (i.e. Age 17 or below) has decreased by 93 between 2001 to 2011. Over the same time period, the number of people aged 65 and over has risen by about 3,989, representing a 26% increase and the number of people in the 18-64 age group has increased by 1,904 over the same time period.

2.12 The population of Bromsgrove is projected to increase by about 6,000 for the period 2011-21(99,637), and by about 12,800 up to 2030 (106,437). The 18-64 age group stays roughly constant over the 2008-30 time period, whilst the 0-17 age group has a projected increase of around 800. The number of persons aged 65-plus is projected to increase by around 11,300.

2.13 The 2010 Indices of Multiple Deprivation Bromsgrove had the highest proportion of Lower Super Output Areas (LSOAs) in the least deprived quintile /fifth of the population (47%) across the West Midlands. When compared to the rest of Worcestershire, Bromsgrove District has the lowest instances of deprivation, and ranks in the bottom quarter of most deprived local authorities across England (280th out of 354 authorities). However, this has seen an increase from the 2007 Indices, whereby Bromsgrove was positioned 299th nationally. Although the majority of the District performs well in terms of deprivation, there are small pockets of deprivation that need to be tackled. There are three LSOAs in the 30% most deprived nationally and the most deprived area in the District is in the northern part of Sidemoor, which is ranked, 8,168th out of 32,482 most deprived areas nationally (DCLG Indices of Multiple Deprivation, 2010).



2.14 The demand for property within the District has historically had significant implications on property prices. In 2012 the average house price in Bromsgrove was £236,632<sup>2</sup> compared to £205,303 for the rest of Worcestershire and £171,937 for West Midlands. However in July 2012 the average house price in Bromsgrove fell to £221,431 compared to £226,887 nationally<sup>3</sup>. Whilst property prices have stagnated over the past 3 years the current difficulty in acquiring mortgages means home ownership is unobtainable for some. The affordability issue is exacerbated in the smaller rural settlements where property prices are generally even higher, meaning that young people especially, are often unable to find a home in the community where they grew up.

2.15 Education in Bromsgrove is administered by Worcestershire County Council, which controls 27 schools in the District. Local schools continue to perform well with 86.7% of pupils at the end of key stage 4 in the period September 2011 – August 2012 achieving 5+ A\*-C grades, compared to 82.5% in Worcestershire<sup>4</sup>.

2.16 Bromsgrove District is considered to be a safe place to live, with levels of crime being lower than the regional and national figures. In Bromsgrove there were 4,945 crimes recorded during 2011/12, 0.05 crimes per person. This compares to a total of 35,524 criminal offences recorded in Worcestershire, 0.06 crime per person. There were 3,420 Anti Social Behaviour incidents recorded during 2011/12 in Bromsgrove.<sup>5</sup>

2.17 The District has a relatively healthy population in respect of illness, with 49.1% of the population considering themselves to be in very good health, compared to 46.5% in Worcestershire and 45.1% in the Region. The Sport England Active People Survey (survey covers Oct 2010-Oct 2011) states that 20% of respondents regularly participate in sport 3 times a week and 37.3% (survey covers April 2012 to April 2013) participate in 30 minutes of moderate intensity sport once a week. Bromsgrove therefore has a significant number of its population who regularly participate in sporting activity.<sup>6</sup>

### **Environmental Characteristics**

2.18 The District has rich biodiversity, geodiversity and attractive landscape. The District contains 13 Sites of Special Scientific Importance, 90 local sites (85 ecological and 5 geological). These sites are varied in their nature ranging from whole valleys and hills to canals, ponds and rock exposures.

2.19 Bromsgrove falls within the Severn Water Resource Zone which is experiencing shortfalls in water supply. Existing abstraction has caused unacceptable environmental impacts in several areas which include the Bow Brook and the Battlefield Brook. Flood risk within the District is mainly associated with flash flooding of ordinary watercourses as a result of rapid rainfall runoff. In addition to the increase in flow, the localised flooding is

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<sup>2</sup> <http://www.worcestershire.gov.uk/cms/research-and-intelligence/local-area-profiles.aspx>

<sup>3</sup> [http://news.bbc.co.uk/1/shared/spl/hi/in\\_depth/uk\\_house\\_prices/html/houses.stm](http://news.bbc.co.uk/1/shared/spl/hi/in_depth/uk_house_prices/html/houses.stm)

<sup>4</sup>

<http://atlas.worcestershire.gov.uk/IAS/profiles/profile?profileId=36&geoTypeId=16&geoIds=47UB#iasProfileSection8>

<sup>5</sup> <http://atlas.worcestershire.gov.uk/IAS/profiles/>

<sup>6</sup> [https://public.sportengland.org/.../Bromsgrove\\_Mini\\_LSP\\_Jan\\_2012.pdf](https://public.sportengland.org/.../Bromsgrove_Mini_LSP_Jan_2012.pdf)



exacerbated by the lack of maintenance of the watercourses, change of land management practice, new development, soil types, blockages and reduced channel capacity resulting from culvert collapse. In addition, parts of Bromsgrove are also affected by fluvial and sewer flooding. Watercourses receiving water from the STWs that serve the District includes the River Arrow, Hoo Brook, Sugar Brook, River Tame, River Stour and Hen Brook. With the exception of the River Tame which is only assessed for its dissolved oxygen, all watercourses fail to meet at least one of the Water Framework Directive (WFD) objectives and standards. The District contains 2 canals and numerous pools and reservoirs. In terms of biodiversity, the habitats and species that are of particular relevance to Bromsgrove are water voles, bats, hay meadows, acid grassland veteran trees and canals.

2.20 The Local Landscape Character as described in the Worcestershire County Council's Landscape Character Assessment<sup>7</sup> illustrates that there are ten different Landscape Character Types (excluding urban) in the District and these comprise of Estate Farmlands; Principal Settled Farmlands; Principal Timbered Farmlands; Principal Wooded Hills; Sandstone Estatelands, Settled Farmlands with Pastoral Land Use; Timbered Pastures; Timbered Plateau Farmlands; Wooded Estateland and Wooded Hills and Farmlands . The natural and rural nature of the District provides ample opportunity for outdoor leisure activities. Tourism destinations within Bromsgrove are varied and include, for example, the Lickey, Clent and Waseley Hills country parks, Avoncroft museum and the Worcester and Birmingham canal, which boasts the Tardebigge Locks being the longest navigable flight of locks in country, comprising 30 locks climbing 217 feet (66m).

2.21 Bromsgrove District is predominantly rural and away from the more built up areas around Bromsgrove, is characterised by a settlement pattern of farmsteads and wayside dwellings with the occasional village.

2.22 The historic landscape in terms of field boundaries, including some post medieval enclosure, has survived in many areas. The recent Historic Environment Assessment of Bromsgrove District indicated that there was generally a moderate to high survival rate of historic character across the District, although many of the historic assets are undesignated. However there are over 467 Listed Buildings and 839 known sites of Archaeology Interest, 13 of which are Scheduled Ancient Monuments. The listed buildings range from the Grade I listed Hagley Hall and St John's Church in Bromsgrove, through a variety of rural buildings including two windmills to a 1950s house in Hopwood. There are also 11 Conservation Areas that are designated as being of special architectural or historic interest and 2 registered historic parks and gardens. The Conservation Areas vary greatly in their character. The majority are centred around villages such as Alvechurch and Belbroughton, which date back to at least medieval times, as well as Bromsgrove Town Centre. The more unusual conservation areas include a stretch of the Worcester and Birmingham Canal and the Chartist settlement at Dodford. The Canal Conservation Area includes the Tardebigge Flight (as mentioned above 30 locks, which are all listed). The Dodford Conservation Area is centred on the planned Chartist settlement

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<sup>7</sup> <http://www.worcestershire.gov.uk/cms/landscape-character-assessment.aspx>

developed in the 1840s and originally comprised 39 cottages on 4 acre plots. The original layout has survived as well as a number of the cottages 11 are listed including Rosedene, owned by the National Trust. Dodford was one of five Chartist Settlements constructed in the country, and is considered to have been one of the key events in agricultural development in Worcestershire.

2.23 In addition to the Chartist Settlement at Dodford there are other assets within the District which are important in terms of local character and distinctiveness. Notably these include the cottages and workshops relating to the nailing industry, which boomed in Bromsgrove during the 18th and early 19th century, and can be found throughout the District; structures and other evidence relating to the scythe industry in Belbroughton; work by the Bromsgrove Guild of Applied Arts, founded at the end of the 19th century, which attracted craftsmen to the area from across Europe, before it closed in the late 1960s.

2.24 The high proportion of Green Belt, throughout the District, has preserved a relatively coherent post medieval landscape. Large 20th century development has largely overwritten historic landscape character in undesignated areas such as Hagley Village and Hollywood. Although Bromsgrove District remains predominately rural, the District has experienced a greater loss of historic farmsteads compared to other areas of the county. A large proportion of surviving farmsteads have undergone some level of conversion, which does at least secure their future.

2.25 In terms of Buildings at Risk, Bromsgrove District has relatively few Designated Assets on the English Heritage at Risk Register. However, the absence of a local list means that large numbers of locally important heritage assets have not been formally identified.

2.26 The largely unspoilt rural environment, the rich variety of historic assets and character make the District a much sought after and desirable place to live, and no doubt help in attracting tourism and regeneration.

2.27 The District has a high dependence on car ownership compared to national statistics. Figures from the 2011 Census show that only 12.5% of households in Bromsgrove do not own a car or van. This compares to 16.6% of households in Worcestershire, and 25.8% in England.

2.28 The number of people travelling to work by car (49.9%) is higher than the national average (36.9%). The District's excellent motorway and 'A' road network together with the poor access to public transport in the rural parts of the District contribute to this high dependency on car use. Due to the District's close proximity to the West Midlands conurbation, many inhabitants in Bromsgrove commute to work in Birmingham.

2.29 Although the District benefits from excellent strategic road connections, it experiences localised environmental problems and associated congestion caused by high traffic volumes. The District has four Air Quality Management Areas, at Redditch Road, Stoke Heath; Kidderminster Road, Hagley; along Hanover Place and Worcester Road within the Town Centre, and at Lickey End adjacent to Junction 1 of the M42. Furthermore, if there is a problem with traffic flows on the motorway(s) in the vicinity of Bromsgrove, traffic tends to divert through Bromsgrove, causing localised congestion and air quality issues at certain times. These main traffic routes also pose problems with noise pollution for local residents.

2.30 Birmingham Airport is located within easy commuting distance of Bromsgrove. The Airport provides vital links with Europe and the rest of the world for local and regional business tourism, international conferences and sporting events and is also a major employment site. The Airport is therefore key to maintaining the region's competitiveness and in terms of Bromsgrove, maintaining and improving connectivity to and from the Airport is fundamental.

2.31 The District is also served by train connections with a number of commuter routes passing through the District into Birmingham. Over the last ten years the number of people who use Bromsgrove station has increased. Despite this increased usage the existing station and its facilities are inadequate, accessibility to the Town Centre is poor; there are limited parking facilities; poor access by local bus and existing platform lengths prohibit larger trains from stopping. The station presents a poor image as the gateway to Bromsgrove. The District is also served by 4 other stations at Alvechurch, Barnt Green, Hagley and Wythall. Over the period 2004/2005 to 2009/2010 the number of people using Bromsgrove District's five railway stations has increased by nearly 130% although growth in demand at Bromsgrove station has been higher (at 155%) despite the constraints at this station. These issues are, however, being addressed by the rail industry in partnership with the public sector and, subject to funding, a high quality multi-modal interchange at Bromsgrove is currently planned together with a variety of improvements at other stations. The District is also served by a mixture of local and interurban bus services which provide essential links to local facilities and services and also to neighbouring towns and cities. Bus patronage increased by approximately 38% over the period 2004/5 and 2008/9.

### **3. Key challenges**

3.1 As can be seen from the District profile there are various challenges which the District faces and these together with broader issues are summarised below:

- 1) Regeneration of the Town Centre.
- 2) Maintaining vitality of smaller villages.
- 3) Meeting the growth needs of the District up 2030 and beyond by ensuring that there is an adequate supply of appropriate housing and employment land thus providing certainty for the development industry.
- 4) Maintaining a balanced community in terms of population structure and the housing market. Meeting the needs of the community in particular the provision of affordable housing and housing suitable for the elderly.
- 5) Attracting inward investment and stemming outward commuting

- 6) Striking a balance between ensuring the District is accessible whilst also encouraging sustainable travel by, for instance, encouraging walking and cycling and the increased use of public transport
- 7) Responding to the needs of existing employment and the economy and recognising the importance of farming/agriculture in the District
- 8) Recognising the strength provided to the economy by diversification into, for example, high technology industries, green industries and in rural areas, farm diversification. Also recognition of the benefits of homeworking in rural areas whilst acknowledging potential problems of broadband coverage in such areas.
- 9) Stemming outward migration of young people due to issues of housing affordability and lack of suitable employment
- 10) Promotion of a healthy community, recognising the importance of green infrastructure and its multi functionality, as well as open space/leisure facilities, and reducing the number of “hot food” outlets
- 11) Recognising the role as custodians of the environment for future generations including for example, managing the water environment and flooding issues; addressing climate change issues, reducing carbon emissions and increasing the use of renewable energy.
- 12) Celebrating and conserving the District’s individuality as an attractive and safe place with a unique historic built environment and landscape which is biodiversity rich.
- 13) Ensuring that the District enjoys a sustainable built environment that enables and empowers users and occupiers to feel safe and secure through the incorporation and provision of new or improved infrastructure.
- 14) Ensuring the local communities have a greater involvement in planning the future of the communities in which they live.

#### **4. VISION**

4.1 The vision for Bromsgrove expressed in the Bromsgrove District Plan needs to support the vision that has been established by the Bromsgrove Partnership. This Partnership brings together different organisations from the public, private, voluntary and community sectors. Instead of each organisation working separately in isolation, the Bromsgrove Partnership provides a forum for local organisations to come together and address issues that are important to those living, working and visiting Bromsgrove District in a more effective and cohesive way.

Bromsgrove Partnership’s vision for the District is:

***“We will make Bromsgrove District the place to live, do business and to visit.”***

The vision also needs to be consistent with the vision of the relevant Local Enterprise Partnership (LEP). Embracing the key messages of the LEP visions and incorporating the challenges previously identified, the following vision for the Bromsgrove District Plan has been derived:

### **BDP Vision**

4.2 By 2030 Bromsgrove District and its communities will have become sustainable, prosperous, safe, healthy and vibrant. People from all sections of society will have been provided with access to homes, jobs and services. The attractiveness of the District in terms of its landscape, built form and settlements will have been preserved and enhanced.

#### **The Economy**

4.3 Bromsgrove will maintain low levels of unemployment by providing a range of jobs in various sectors, with growth primarily focussed on knowledge based industries and manufacturing situated at the Bromsgrove Technology Park and at Longbridge. Existing employment will have been supported, whilst opportunities for entrepreneurship, diversification and innovation will have been encouraged. Diversification of sustainable rural enterprises will also have been encouraged, helping to improve prosperity in both Bromsgrove Town Centre and the rural areas.

4.4 Longbridge will have undergone a major transformation and will now be an exemplar sustainable mixed use development, delivering new jobs, houses and community, leisure and educational facilities for the benefit of the local communities of, Bromsgrove, Birmingham, and beyond.

#### **The Town Centre**

4.5 A regenerated Town Centre will be the key centre for services in the District. The Town Centre will be transformed into a thriving location that provides a unique blend of old and new. The Town Centre will be an attractive place to visit with a network of public squares and interlinking pathways, making it an easy and convenient place to move around, engendering both community pride and a sense of place. The Spadesbourne Brook will have been naturalised wherever feasible, thereby supporting biodiversity, particularly the native water vole and alleviating flood risk. The Town Centre will be accessible for all, being easily reached and well linked by public transport and with good access by car. There will be a vibrant mix of retailing including popular high street stores, smaller independent retailers and specialised markets. A variety of pubs, cafes, restaurants, leisure and cultural facilities will provide a lively, safe and varied leisure experience. The increase in people living and working in the Town will contribute to its prosperity, vitality and safety.

#### **Sustainable communities**

4.6 In the next 15 to 20 years, the District will have achieved a more balanced housing market and be continuing to deliver the required level of housing growth to meet local needs. New employment space together with shops, services and community facilities will have been provided alongside this development. All new development will therefore be planned in a balanced and sustainable way, placing a high priority on quality of life, ensuring the protection and enhancement of valuable natural and historic resources and providing the necessary supporting infrastructure.

4.7 New development will have been directed to sustainable locations around Bromsgrove town in the first instance, whilst encouraging appropriate levels of housing provision in other sustainable locations, such as the larger settlements. Sustainable and inclusive urban extensions will be established to the north and west of the town. The identification of the transport infrastructure, services and supporting Travel Plans needed to encourage walking, cycling, the use of public transport and high occupancy car modes will have been recognized at the beginning of the planning process. Developments will deliver affordable housing, employment, open space, and community facilities and will achieve a high standard of sustainable design and construction. New and existing communities will be supported by a network of local centres which will provide local residents with easy access to shopping, employment and services. Public transport, walking and cycling links will have been improved to better connect residents with local and regional destinations, providing health benefits and decreasing carbon emissions. Walking and cycling will be an easy first choice for shorter journeys. More balanced, mixed use communities with good service centres, together with a greater proportion of people working from home will have further reduced the need to travel and levels of out commuting from the District.

### The Villages

4.8 The smaller villages and neighbourhood centres will be maintained and enhanced to play a valuable role in providing local services and reducing the need for local people to travel for their day to day requirements. These centres will be part of a working and tranquil countryside which remains unmistakably Bromsgrove. The countryside will be well managed balancing the potentially conflicting use for recreational purposes whilst preserving it as a rich biodiversity resource.

4.9 Residents will live in a mixture of well designed homes within high quality surroundings whether part of the urban areas, village or countryside, in accommodation they can afford and which meets their needs. This will include varying tenures that will meet the social needs of residents, including the provision of affordable housing. Schemes will be delivered which support independent living for vulnerable people and the elderly population.

### Community Issues

4.10 The local people of Bromsgrove will be more actively involved in decision making for their communities and neighbourhood plans will have an increased role to play in planning the future of these communities.

4.11 Bromsgrove's population will remain comparatively healthy, with people taking more habitual physical activity and utilising the range of high quality sports and recreation facilities the District has to offer. People will have the opportunity to lead healthier lifestyles with improved access to clean and attractive green spaces, facilitated by a comprehensive network of walking and cycling routes. Higher levels of employment, increased personal wealth, greater community empowerment and greater access to social and medical support will have improved the health of the community and people will generally have a better quality of life. Good design, improved leisure opportunities, increased community pride and social inclusiveness will have ensured that crime rates and fear of crime have been reduced.

### The Environment

4.12 Important natural and historic areas and buildings help to create the distinctive character and identity of Bromsgrove District and its settlements. These include the Lickey, Clent and Waseley Hills, canals, ancient woodlands, areas of nature conservation, biodiversity and landscape character, together with Conservation Areas, listed buildings and their settings, all of which will have been carefully protected, conserved and enhanced. The Green Belt boundary will remain unchanged<sup>8</sup>, and the quality of the environment will continue to improve with the existing high levels of open space and 'greenery' within the settlements maintained and improved.

4.13 Bromsgrove District will have become much more effective in adapting to and mitigating the impacts of climate change. New developments will be using an increased proportion of energy from renewable sources; air quality will have been improved; recycling will have radically increased; and the carbon footprint of the District will have been significantly reduced. Developments will be built to a higher design standard ensuring increased energy and water efficiency. Sustainable Drainage Systems will be also be utilised to mitigate flooding and will contribute to strengthening the green infrastructure network. Green infrastructure will have become a comprehensive and integral part of the fabric of the District, with resultant multi- functional benefits for biodiversity, flood alleviation, water conservation, leisure, health and well-being. Networks of ecologically functional habitats will have been identified and (re)connected where possible as a part of development proposals.

## 5. STRATEGIC OBJECTIVES

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<sup>8</sup> Subject to a review by 2023

5.1 A set of spatial objectives have been defined that aim to deliver the spatial vision, as detailed above, for Bromsgrove by 2030. They build upon national policy and address key local challenges. The objectives provide the basis for the preferred spatial strategy for the District, including the core policies which are necessary to secure the delivery of the vision. The proposed strategic objectives, which are not in any specific order of preference, are outlined below:

SO1 Regenerate the Town Centre to create a thriving, accessible and vibrant centre providing facilities to meet the needs of Bromsgrove residents

SO2 Focus new development in sustainable locations in the District such as on the edge of Bromsgrove Town in the first instance

SO3 Support the vitality and viability of local centres and villages across the District

SO4 Provide a range of housing types and tenures to meet the needs of the local population for example the special needs of the elderly and the provision of affordable housing

SO5 Provide support and encouragement for economic growth of existing and new businesses for example, in knowledge based industries and high tech manufacturing, whilst also supporting farming and rural diversification and investing in lifelong education and learning skills

SO6 Encourage more sustainable modes of travel and a modal shift in transport, for example encouraging walking and cycling and promoting a more integrated, sustainable and reliable public transport network across the District

SO7 Improve quality of life, sense of well-being, reduce fear of crime, promote community safety and enable active, healthy lifestyles for example by providing safe and accessible services and facilities to meet the needs of Bromsgrove's residents

SO8 Protect and enhance the unique character, quality and appearance of the historic and natural environment, biodiversity and green infrastructure throughout the District

SO9 Safeguard and enhance the District's natural resources such as soil, water and air quality; minimise waste and increase recycling including re-use of land, buildings and building materials

SO10 Ensure the District is equipped to adapt to and mitigate the impacts of climate change, for example, by managing and reducing flood risk by ensuring water and energy efficiency and by encouraging new developments to be low or zero carbon



SO11 Promote high quality design of new developments and use of sustainable building materials and techniques

SO12 Foster local community pride, cohesion and involvement in plan making process

## 6. Structure of policies

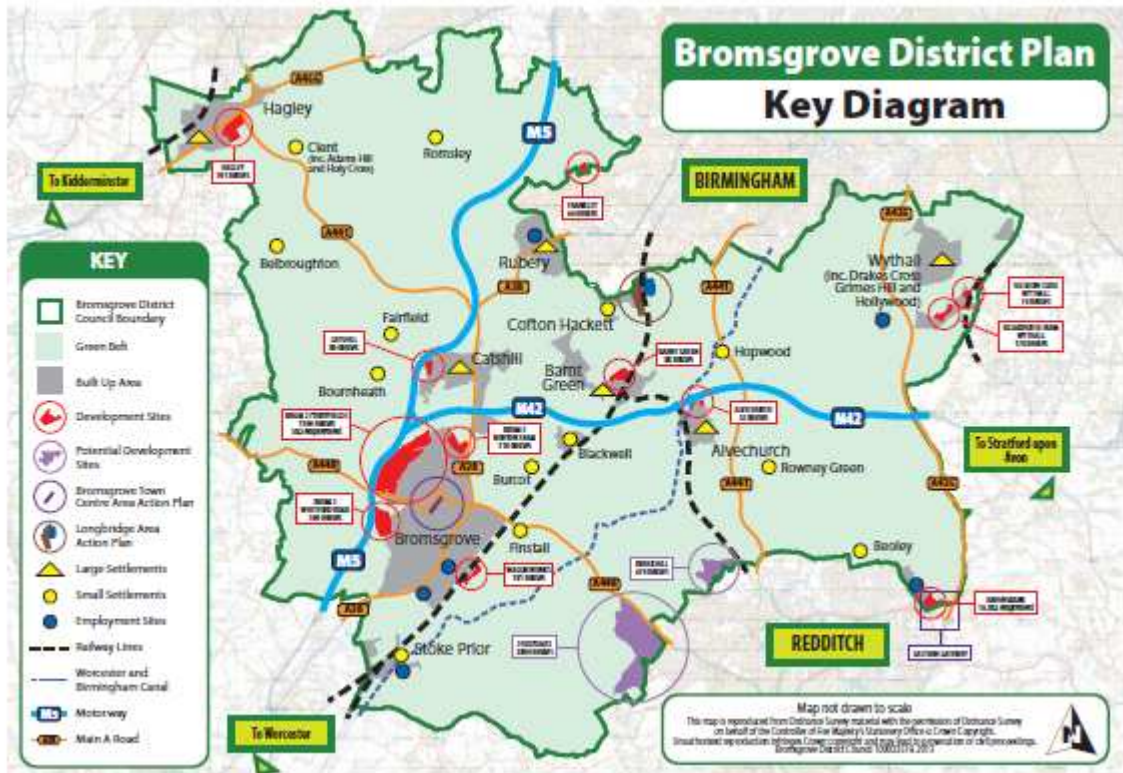
6.1 A number of inter-related themes have emerged from the strategic objectives and these have been used as a basis to structure the Policies. Due to their spatial nature there will inevitably be some overlap between the policy areas. Where this explicitly occurs, cross references have been included for the sake of clarity, however it is likely that subtle overlaps will also occur and **the plan should therefore be considered in its entirety**. The structure of the Policies section of this document is therefore subdivided into main themes as follows:

- **Development Strategy**
- **No Place like Home**
- **Let's do Business**
- **The One and Only Bromsgrove**
- **Clean, Green and Healthy**

6.2 The context for each policy is first provided, then a brief feedback on consultation and the Sustainability Appraisal is given and finally the actual policy is highlighted in bold typeface.

## 7. KEY DIAGRAM

**The Key Diagram** diagrammatically illustrates, the spatial strategy set out within the document.



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## 8. POLICIES

### 8.1 Development Strategy

- BDP 1 Sustainable Development Principles
- BDP 2 Settlement Hierarchy
- BDP 3 Future Housing and Employment Development
- BDP 4 Green Belt
- BDP 5 A) Town Expansion Sites
- 5 B) Other Development Sites
- RCBD 1 Redditch Cross Boundary Development
- BDP 6 Infrastructure Contributions

This suite of policies identifies the strategic growth needs of the District. It identifies where the most sustainable locations for growth are and puts in place policies to ensure that this development is well designed and will be delivered. It advocates a green belt review of the plan and sets the criteria by which this review will be achieved.

### BDP1 Sustainable Development Principles

8.2 Following the publication of the NPPF the presumption in favour of sustainable development ('the presumption') is a key consideration in all planning applications. This provides a more positive and purposeful framework for assessing and determining development proposals in accordance with this

Plan or any relevant Neighbourhood Plans. Where proposals accord with this Plan the Council will aim to approve them without delay.

8.3 To expand upon 'the presumption' this policy sets out the local issues which need to be considered when determining whether development is sustainable. There is a need to balance the social, economic and environmental impacts of any particular development. This is critical in the delivery of sustainable development which is an overarching aim of the Bromsgrove District Plan.

8.4 Where no policies in the Plan are relevant or relevant policies are out of date, proposals will be assessed against the NPPF and only be refused where the adverse impacts significantly outweigh any benefits or specific policies highlight that development should be restricted. In Bromsgrove it is considered that policies relating to sites designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space; designated heritage assets and locations at risk of flooding override the presumption in favour of sustainable development.

### **Consultation Feedback**

8.5 Consultation feedback was generally very positive in relation to this policy with many supporting the policy in its current form. Some did feel that the policy should be removed as it repeated national policy however following the publication of the NPPF it was considered that the policy went beyond the level of detail provided in the new national guidance. It is considered that the policy draws on a wide range of planning issues to provide a clear and concise list of criteria against which all applications can be assessed.

8.6 Some felt the policy could be strengthened to make it more deliverable and also be more positive in relation to the natural environment, making a specific reference to the significance of historic assets and their settings and clearly referencing walking, cycling and public transport. Some also considered that there should be an explanation in relation to the final bullet point that refers to the economic implications for the District. Some minor wording changes were included to add further clarity and strength to the policy but some of the wording changes were considered to overlap and repeat other policies. The wording 'In considering all proposals for development regard will be had to the following' has not been amended as stronger wording could be considered too onerous, as all of the criteria will not be relevant to all applications.

8.7 The policy has been expanded significantly to include a version of the model policy on the presumption in favour of sustainable development to ensure conformity with the NPPF.

### **Sustainability Appraisal**

8.8 The policy was assessed against the SA objectives and was one of the strongest performing policies due to the overarching nature of the policy. The policy performed well against social, environmental and economic objectives. There were no recommendations for mitigation.

## **BDP1 Sustainable Development Principles**

**BDP1.1** When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

**BDP1.2** Planning applications that accord with the policies in this District Plan and where relevant, with policies in neighbourhood plans will be approved without delay, unless material considerations indicate otherwise.

**BDP1.3** Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- a) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- b) Specific policies in that Framework indicate that development should be restricted as stated in footnote 9 of paragraph 14 of the NPPF. For example, those policies relating to sites designated as Sites of Special Scientific Interest; remaining land designated as Green Belt, Local Green Space, designated heritage assets and locations at risk of flooding.

**BDP1.4** In considering all proposals for development in Bromsgrove District regard will be had to the following:

- a) Accessibility to public transport options and the ability of the local road network to accommodate additional traffic;
- b) Any implications for air quality in the District and proposed mitigation measures;
- c) The cumulative impacts on infrastructure provision;
- d) The quality of the natural environment including any potential impact on biodiversity, landscape and the provision of/and links to green infrastructure (GI) networks<sup>9</sup>;
- e) Compatibility with adjoining uses and the impact on residential amenity;
- f) The impact on visual amenity;

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<sup>9</sup> see GI policy BDP 24 and glossary

- g) The causes and impacts of climate change i.e. the energy, waste and water hierarchies, flood risk and future proofing;**
- h) The provision of communication technology infrastructure to allow for future technological enhancements e.g. fibre optic ducting;**
- i) The impact on the historic environment and the significance of heritage assets and their setting;**
- j) Financial viability and the economic benefits for the District, such as new homes and jobs.**

## **BDP2 Settlement Hierarchy**

8.9 Bromsgrove District contains one main town, Bromsgrove Town and a number of other settlements and villages which vary in size and character. 91% of the District is Green Belt and this designation covers over 20000 hectares of land. Many of the villages in the District are of a rural nature and in some cases these villages can be relatively isolated. Settlements work by providing services for a wider area, the bigger the settlement the more services it tends to have. Over time a settlement hierarchy has been established in the District, with Bromsgrove Town providing most of the services. Generally the smaller settlements have been limited to providing local services and as car ownership has increased, service provision in the smaller villages has tended to decline.

8.10 The purpose of the settlement hierarchy is to provide a clear policy on the future role of the District's settlements and villages to enable allocation of appropriate levels and types of development to different settlements within the District, focusing new development in locations which will provide and support sustainable communities. It is useful for plan making purposes to group these settlements into a hierarchy based on an understanding of their current size and level of service provision.

8.11 Bromsgrove is by far the largest settlement and stands alone at the top of the hierarchy with a different order of services and facilities in comparison to all of the other settlements in the District. Bromsgrove Town is therefore the principally preferred location for growth.

8.12 The settlement hierarchy reflects the regeneration priorities for the District and is based on the size of the settlement and an assessment of the facilities and services available in each settlement.

8.13 Whilst the majority of development will occur around the Town and in the larger settlements there will be opportunities for small affordable housing schemes in rural settlements that meet local needs. Until a Green Belt Review is carried out it is considered desirable for village envelope boundaries to remain unchanged.

### **Consultation Feedback**

8.14 The inclusion of a settlement hierarchy was supported although some felt that it was based solely on population size and therefore further supporting evidence was needed. Some felt that a fourth tier should be added to the hierarchy to better define the types of settlements and include greater clarity

over the types of development permitted within each type of settlement. Some considered that Blackwell, Cofton Hackett and Stoke Prior should form part of a higher tier and all other smaller settlements the fourth. However it is not considered that this approach is entirely robust as some of the smaller settlements, whilst they do have a lower population sometimes have a greater range of services and facilities, such as Belbroughton and Romsley, than the three identified allegedly 'higher order' settlements. It is however considered that there is sufficient flexibility within the policy to allow appropriate development to come forward in the settlements not 'washed over' by Green Belt. Furthermore to exactly define what types of development that would be allowed in each settlement type was considered too inflexible and following the publication of the NPPF, being prescriptive about the types of allowable development would not be in conformity with the spirit of this guidance. Some also raised concerns over the position of particular settlements within the hierarchy and the omission of certain settlements, for example, Tardebigge and Huntington. The settlement hierarchy evidence acknowledges that not all settlements are included in the hierarchy, particularly the smaller settlements within the Green Belt which are sometimes purely ribbon development and/or with very limited sustainability credentials.

8.15 There were concerns raised that the policy effectively prohibited garden land development which can form an important part of housing supply and that mention of this aspect was inappropriate in the settlement hierarchy policy. Whilst the discussion of the issues around brownfield land was originally considered valid in this policy, following a redraft of the policy this issue has been relocated to the high quality design policy.

8.16 Some considered that it was not necessary to make reference to the maintenance of a 5 year supply as it was repetition of national policy. Others considered that the release of development sites should be carefully managed through the plan period. It was also suggested that some of the proposed development sites should be retained as ADRs. On reflection it was considered that these issues would be better dealt with in the policy on Future Housing and Employment Development.

### **Sustainability Appraisal**

8.17 The strength of the policy is that it underpins the sustainable development strategy for the District in that future development will be focussed on the most sustainable settlements which contain a range of services and facilities. The policy therefore provides the basis for focusing growth in sustainable locations whilst acknowledging the importance of allowing some growth in the villages.

### **BDP 2 Settlement Hierarchy Policy**

**There will be four main facets to the delivery of housing in Bromsgrove District consisting of the following:**

- 1. Development of previously developed land or buildings within existing settlement boundaries which are not in the designated Green Belt**
- 2. Expansion Sites around Bromsgrove Town (as identified in BDP 5A)**

3. Development Sites in or adjacent to large settlements(as identified in BDP 5B)
4. Exceptionally, affordable housing will be allowed in or on the edge of settlements in the Green Belt where a proven local need has been established through a comprehensive and recent survey and where the choice of site meets relevant planning criteria. Where viability is a concern the inclusion of other tenures within a scheme may be acceptable where full justification is provided. Where a proposed site is within the boundaries of a settlement, which is not in the Green Belt, a local need for housing would not need to be justified

Proposals for new development should be located in accordance with the District's settlement hierarchy as shown in the table below. This will ensure that development contributes to the regeneration priorities for the area, preserves the attractiveness of the environment, reduces the need to travel and promotes sustainable communities based on the services and facilities that are available in each settlement and will assist villages to remain viable and provide for the needs of the catchment population that they serve.

<b>Settlement type</b>	<b>Name</b>	<b>Suitable development</b>
<b>Main Town (population circa 30,000)</b>	<b>Bromsgrove</b>	<b>Comparison and convenience retail (to meet District requirements and needs) Commercial leisure- restaurants, cafes pubs and bars Office Residential development of a scale proportional to the sustainability of the settlement. Hotels/guest houses Employment Leisure/culture ie churches, health centres, libraries, public halls etc Major services</b>
<b>Large 'Settlement' (population circa 2500- 10,000)</b>	<b>Alvechurch Barnt Green Catshill Hagley Rubery Wythall</b>	<b>Convenience A1 retail (to meet needs of the specific village) Local services Residential development of a scale proportional to the sustainability of the settlement. Small scale business/office development</b>

<p><b>Small 'Settlement' (population circa 50-2500)</b></p>	<p><b>Belbroughton<sup>10</sup> Blackwell Cofton Hackett Romsley Stoke Prior Adams Hill Beoley Bournheath Burcot Clent Dodford Fairfield Finstall Holy Cross Hopwood Lower Clent Rowney Green</b></p>	<p><b>Housing to meet local needs (through rural exception sites in appropriate circumstances). Where a proposed site is within the boundaries of a settlement, which is not in the Green Belt, a local need for housing would not need to be justified.</b> <b>Local services</b> <b>Small scale rural employment in appropriate circumstances.</b> <b>More limited local services for example, local convenience shop/post office or public house.</b></p>
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5. **The Settlement Hierarchy outlined above will provide the guiding principles in terms of sustainability for the proposed Green Belt Review sequential testing.**
6. **The 'village envelope' ie the defined settlement boundary for a village, is identified on the Policies Map and will remain unaltered until a review of the Green Belt is undertaken. Within the village envelope appropriate development will be limited to suitable infill plots. This applies to the following villages; Adams Hill, Belbroughton, Beoley (Holt End), Bournheath, Burcot, Clent, Fairfield, Finstall, Holy Cross, Hopwood, Lower Clent, Romsley and Rowney Green.**

### **BDP3 Future Housing and Employment Growth**

8.18 The NPPF requires local authorities to use local evidence to ensure that Local Plans meet the full objectively assessed needs for housing and economic development<sup>11</sup>. It is essential that housing and employment targets are based on up to date and robust evidence.

8.19 The Worcestershire Strategic Housing Market Assessment 2012 (SHMA) analyses the current housing market and assesses future demand and need for housing within each local authority across the County. In determining the potential housing requirement for the District a range of scenarios were tested with the most realistic being migration-led and employment constrained scenarios which identified a net dwelling requirement for the period 2011-2030 of 6,980 and 6,780 respectively. The Council is committed to significantly

<sup>10</sup> Villages highlighted in blue are subject to a village envelope

<sup>11</sup> Paragraph 47 of the NPPF



increasing the supply of housing to meet need and demand. On this basis a housing target of 7,000 is proposed for the 19 year plan period.

8.20 It is fundamental to the success of the strategy for growth that the Council is able to achieve, and maintain, a 5 year supply of housing land. Following the publication of the NPPF, local authorities have to provide a buffer of either 5% or 20% depending on whether they have a history of persistent under-delivery. Based on the evidence analysed within the paper 'Housing Delivery Performance' the Council will initially seek to maintain a buffer of 5% in addition to the 5 year land supply.

8.21 The NPPF highlights that windfalls can now be included in 5 year land supply calculations where there is compelling evidence that windfalls have consistently become available and will continue to do so in the future. A separate paper entitled '5 Year Land Supply in Bromsgrove District' highlights that an allowance of 30 dwellings per annum should be included.

8.22 The sites and associated development trajectories identified in the SHLAA highlight that approximately 4,600 homes will be delivered in the period up to 2023. This equates to the equivalent of a 12 years supply of land that can be delivered without the need to alter Green Belt boundaries. Previous versions of the SHLAA have indicated that only 4,000 homes could be developed on non-Green Belt land. This increase of 600 is primarily due to the inclusion of a windfall allowance. The breakdown of the types of sites contributing to the 4,600 total is detailed in the table below:

<b>Source of Supply</b>	<b>No. of Dwellings</b>
Completions (2011-13)	386
Commitments	1052 <sup>12</sup>
Bromsgrove Expansion Sites	2106
Remaining Development Sites	179
Other SHLAA Sites	421
Windfall Allowance	480
<b>TOTAL</b>	<b>4624</b>

8.23 It is clearly essential that a full Green Belt Review is undertaken following the adoption of this Plan to ensure that land can be identified and allocated to ensure that the remaining 2,400 homes can be delivered. This will ensure that the Council is in a position to achieve the housing target of 7,000 by 2030.

8.24 An Employment Land Review was originally completed in June 2009 but this has since been updated in 2012. The minimum forecast requirements identify that a total of 19.9 hectares of employment land is required over the period 2010-2030. However, this figure is considered to be the absolute minimum required and does not take into account any losses of employment land during the plan period. Further land would also need to be made available

<sup>12</sup> This figure includes the development sites at Selsdon Close (Wythall), St. Godwalds Road (Bromsgrove), Birmingham Road (Alvechurch), Kendall End Road (Barnt Green), Kidderminster Road (Hagley) and Bleakhouse Farm (Wythall)

to ensure a balanced portfolio of employment land in terms of sufficient choice of available sites and locations up to 2030. On this basis and also considering the need to strike the right balance between housing and employment growth a minimum target of 28ha is considered appropriate.

8.25 As mentioned above the Council has a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. New housing is considered to be a strategic priority which Redditch Borough Council are unable to fully address within their own administrative boundary and require help immediately to achieve, and then maintain, a 5 year supply of housing land. Land has been identified within Bromsgrove District to deliver 3,400 homes to enable Redditch Borough to achieve their housing target of 6,400. Bromsgrove Council is also aware that Birmingham City Council may require assistance in achieving their housing target. The amount of development required is not yet known but the need for this housing is not immediate. Bromsgrove is also already to help meet the growth needs of Birmingham with the 700 houses currently being developed on the former MG rover plan at Longbridge. It is therefore considered that cross-boundary growth in relation to Birmingham can be addressed through the full Green Belt Review.

### **Consultation Feedback**

8.26 In accordance with the responses received, the plan period has been extended so that it in excess of a 15 year period is covered. In addition the Council has amended the housing and employment targets so that they are based on the most up to date evidence as suggested by some respondents. Concerns were also raised over the failure to address the growth needs of Redditch and Birmingham. The policy has been altered to reflect the concerns in relation to cross boundary growth. The key evidence for this is the Worcestershire Strategic Housing Market Assessment 2012 (SHMA) and the Employment Land Review Update (2012).

### **Sustainability Appraisal**

8.27 The policy performs well against a number of social and economic objectives due to the delivery of housing and creation of new jobs. However, the policy performs less favourably against some of the environmental objectives due to the loss of greenfield land and the potential loss of Green Belt towards the end of the plan period.

### **BDP3 Future Housing and Employment Growth**

<b>BDP1 Development Targets</b>		
<b>BROMSGROVE</b>		
<b>Type of development</b>	<b>Target</b>	<b>Timescale</b>
<b>Dwellings outside Green Belt</b>	4,600	2011-2023
<b>Green Belt Review</b>	2,400	2023-2030

<b>employment land in hectares (ha)</b>	28ha	2011-2030
<b>REDDITCH</b>		
<b>Type of development</b>	<b>Target</b>	<b>Timescale</b>
<b>dwelling units</b>	3400	2011-2030

**BDP3.1** It is proposed that prior to 2023 a full Green Belt Review will have been completed and further sites will have been allocated to contribute approximately 2,400 dwellings towards the 7,000 target.

**BDP3.2** The immediate release of Bromsgrove Town Expansion Sites and Other Development Sites is promoted in BDP5 with development expected throughout the plan period.

**BDP3.3** The Council will seek to maintain a 5 year supply of deliverable sites plus an additional buffer of 5% moved forward from later in the plan period (or 20% where there has been persistent under delivery of housing). Annual monitoring will be used to identify the required rate of housing delivery for the following five year period, based on the remaining dwellings to meet overall requirements. When a five year supply has been achieved the Council will consider whether granting permission would undermine the objectives of this strategy.

#### **BDP 4 Green Belt**

8.28 Ninety-one per cent of Bromsgrove District is currently designated as Green Belt, although this figure will fall to XX per cent with the release of land around Redditch. This forms an integral part of the West Midlands Green Belt, which was established to prevent the outward expansion of the conurbation. The NPPF requires Green Belt boundaries to be capable of enduring beyond the plan period and can only be altered in exceptional circumstances or through the preparation or review of the Local Plan. In view of the urgency to have an adopted up to date District Plan, the Council is progressing a plan that identifies sufficient land to deliver 4,600 of the 7,000 requirement by approximately 2023 without altering Green Belt boundaries. The Council acknowledges the remaining 2,400 homes cannot be delivered without altering Green Belt boundaries. In advance of 2023, a Green Belt Review will be undertaken which will remove sufficient land from the Green Belt to deliver the remaining 2,400 homes in the period 2023-2030 and address the longer term development needs of Bromsgrove District and adjacent authorities based on the latest evidence at the time. The general extent of the Green Belt as indicated on the Policies Map will therefore only be maintained in the short to medium term.

The Green Belt Review will take account of:

- the need to accommodate 2,400 dwellings in the period of 2023 to 2030;
- the need for identifying safeguarded land to meet longer-term development needs in Bromsgrove and possibly in the conurbation stretching 10 years beyond the plan period;

- the cross-boundary development needs of the conurbation in the plan period;
- Identification of the most sustainable sites to meet the needs identified

8.29 As mentioned in BDP 3 Future Housing and Employment Development, the amount of development required in relation to the conurbation is uncertain and will depend on the latest evidence available in the next District Plan review. For meeting the development needs in Bromsgrove, the total amount of land required will be approximately 330ha, including:

- 128ha<sup>13</sup> to deliver 2,400 dwellings until 2030;
- 188ha of safeguarded land to deliver 3,680 dwellings<sup>14</sup> for the 10 years beyond 2030;
- 14ha of safeguarded land to meet employment needs for the 10 years beyond 2030

The Green Belt Review will follow the approach in the settlement hierarchy (BDP2) for Bromsgrove related growth as follows:

- Significant growth in Bromsgrove Town
- Some growth in large settlements
- Limited opportunities for growth in small settlements

8.30 With Bromsgrove Town having a large variety of services and facilities and also the best access to regular public transport, it is the logical location for the largest proportion of growth. At this stage it is not considered appropriate to apportion a particular number or percentage of dwellings to tiers within the settlement hierarchy or individual settlements. This is considered to be inflexible and it is more important to focus on identifying the most suitable and sustainable sites for growth. The Council will work with neighbourhoods and consider Green Belt land around all identified settlements in the settlement hierarchy and potential sites identified in Neighbourhood Plans. This may lead to alterations to some settlement boundaries and some village envelopes where suitable sites for development are identified.

8.31 The Green Belt Review will also consider all land along the northern boundary of the District that adjoins the West Midlands conurbation to meet any growth needs arising from the conurbation. At this stage the quantum of development required is not yet known however the Council is working with the local authorities in the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) under the duty to co-operate to address this issue.

8.32 At this stage no further Green Belt alterations are proposed adjacent to Redditch Town, within Bromsgrove District. Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which Redditch Borough Council believes would enable some longer term land availability to occur. Redditch Borough Council also considers that the likely deterioration of

<sup>13</sup> based on net density 65% developable area for housing at 30dph and the remaining 35% used for supporting infrastructure) e.g.  $((2,500/30)/65) \times 100$

<sup>14</sup> 367 dwellings per annum x 10 years

the 1960's and 1970's New Town areas may provide further regeneration scope within the next plan period.

8.33 Paragraphs 89 and 90 of the NPPF highlights the forms of development that are considered to be appropriate within the Green Belt. The Council intends to use this policy to provide a greater level of detail than what is provided within the NPPF which will aid decision making through the development management process.

8.34 The NPPF permits proportionate extensions to all building in the Green Belt. In terms of residential dwellings this is interpreted by the Council as extensions up to a maximum increase of 40% of the original dwelling or a maximum total floor space of up to 140m<sup>2</sup> (i.e. the original dwelling plus extension). Only extensions built before 1<sup>st</sup> July 1948 (the date of the first modern Planning Acts), should be considered to be part of the original dwelling. For the purpose of calculating the floorspace, only existing curtilage buildings located within 5 metres from the original dwelling house will be treated as forming part of the dwelling. New curtilage buildings located more than 5 metres from the dwelling house will normally be treated as inappropriate development. Any proposed extensions above the identified thresholds will be viewed as inappropriate development and would therefore only be permitted where very special circumstances exist.

8.35 The proposed threshold is the same as that used within Supplementary Planning Guidance 7 - Extensions to Dwellings in the Green Belt (adopted in 2004), which will be amended following the adoption of this Plan. The figure within SPG7 was determined after comprehensive analysis and an 8 week consultation. The Council considers that the situation in the District has not changed since then, that the principle was accepted in planning appeals and the same principle should therefore still apply.

8.36 As there are huge variations in terms of the size for non-residential buildings in the Green Belt across the District it is considered inappropriate to impose a percentage threshold on proportionate extensions. To ensure the openness and the purposes of including the land in Green Belt are maintained, all relevant proposals will be determined on their own merits to reflect what is considered to be proportionate in that particular instance. Issues that may be considered are the openness and the purposes of including the land in Green Belt, highway safety, visual amenities or environmental character resulting from additional traffic, parking facilities, provision of necessary services and amenity of nearby occupiers.

### **Consultation Feedback**

8.37 Most of the comments on Green Belt came from other policies, such as the development sites and employment policies. Comments on Green Belt were contradictory, a considerable amount of comments considered that the Council should do the Green Belt review now to ensure sufficient land is available for development, which should also include leisure development and allow businesses in the Green Belt to expand. At the same time, many

considered that Green Belt should be protected from development and some suggested that several designations of Areas of Development Restraint (identified in the existing local plan adopted in 2004) should be changed to Green Belt.

8.38 There were also some suggestions to provide further protection for the Green Belt, for example, to remove the right to retrospective planning and give higher priority to the openness of Green Belt. There were also comments on the policy repeating national guidance contained in PPG2 Green Belts.

### **Sustainability Appraisal**

8.39 The policy performs strongly in relation to environmental and social objectives in terms of identifying land for future housing in sustainable locations which could additionally contribute to maintaining the viability of the Town centre and local centres.

#### **BDP 4 Green Belt**

**BDP4.1 The general extent of the Green Belt as indicated on the Policies Map will only be maintained as per BDP 4.2.**

**BDP4.2 A Local Plan Review including a full Review of the Green Belt will be undertaken in advance of 2023 to identify:**

- a) Sufficient land in sustainable locations to deliver approximately 2,400 homes in the period 2023-2030 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 and adjacent authorities based on the latest evidence ; and**
- c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period ie. up to 2030.**

**BDP4.3 The Green Belt boundary review will follow the approach in BDP2 Settlement Hierarchy and take into account any proposals in Neighbourhood Plans. Where appropriate, settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development.**

**BDP4.4 The development of new buildings in the Green Belt is considered to be inappropriate, except in the following circumstances:**

- a) Buildings for agriculture and forestry;**
- b) Appropriate facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it;**
- c) Extensions to existing residential dwellings up to a maximum of 40% increase of the original dwelling or increases up to a maximum total floor space of 140m<sup>2</sup>;**

- d) **Proportionate extensions to non-residential buildings taking into account the potential impact on the openness and the purposes of including the land in Green Belt. Proposals that can demonstrate significant benefits to the local economy and/or community will be considered favourably;**
- e) **The replacement of a building, built with the intention of being permanent, provided the new building is in the same use and should not be materially larger than the original building;**
- f) **Limited infilling in Green Belt settlements and rural exception sites in accordance with BDP 9 Rural Exception Sites;**
- g) **Limited infilling or the partial or complete redevelopment of previously developed sites that would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.**

### **BDP5 Bromsgrove Strategic Site Allocations**

8.40 As previously mentioned the Council intends to deliver approximately 7,000 homes in the 19 years between 2011 and 2030. At the time of writing, 386 homes have already been completed, 99 are under construction and a further 953 dwellings have outstanding planning consents. On this basis approximately a further 5,562 dwellings will need to come forward by 2030. To achieve this aim it is considered necessary to allocate sites without delay. This will provide clarity for all interested parties on where the homes will be located and how the targets will be achieved.

8.41 The allocations will be separated into two separate forms. Firstly, there are the three Bromsgrove Town Expansion sites which all need to come forward to maximise delivery prior to a Green Belt Review. Separate to this are the Other Development Sites which are primarily the smaller sites located around the District which also have an important role to play in achieving housing targets. Realistic capacity figures identified for the sites can be found in table 2 of this document. The figures reflect further detailed site assessment work and discussions with relevant stakeholders taking into account any constraints and on-site infrastructure requirements.

#### **A) Bromsgrove Town Expansion Sites**

8.42 Bromsgrove Town is the most sustainable location for significant growth within the District due to the wide variety of services, facilities and employment opportunities available. In addition there are existing public transport links by both bus and rail, which, with further investment in infrastructure and services will help to provide people with a realistic alternative to the car. With the greatest need and demand for housing in Bromsgrove Town, it is a logical location for growth.

8.43 Sustainable urban extensions are proposed around the west and north of Bromsgrove Town. There are three development opportunities, as shown on Map1 below, that individually and collectively are of such a scale and significance that they are central to the success of the Bromsgrove District

Plan. In recognition of this, and to enable progress as quickly as possible, their development is promoted directly through the policies, explanatory text and illustrative diagrams in the Bromsgrove District Plan. The sites are:

- Norton Farm, Birmingham Road (BROM1)
- Perryfields Road (BROM2)
- Whitford Road (BROM3)

8.44 Whilst these three sites are physically separate and under different land ownerships the Council considers that there could be opportunities for joint working that could deliver benefits for the town. For example, Green Infrastructure and Transport Strategies will extend beyond site boundaries improving linkages into the Town and the wider countryside and therefore it is essential that such matters are addressed in a holistic manner. Whilst the sites are unlikely to come forward together a level of collaborative working should ensure a good mix of uses with the right amount of infrastructure to meet local needs in the District.

**8.45 The policy itself focuses on the principles of development and is not intended to provide policy guidance in every respect. It must therefore be read in conjunction with other policies contained within the Bromsgrove District Plan and any other relevant policies including the NPPF.**

### **BROM1, BROM2 and BROM3**

8.46 The three sites provide opportunities for logical extensions to existing urban areas to the west and north of the town. With the M5 and M42 providing defensible long term boundaries, the impact on the wider Green Belt would be negligible. The combined area of the strategic allocations are approximately 111 hectares of which 12 hectares are on BROM 1, 75 hectares are on BROM 2 and 24 hectares on BROM 3.

8.47 Due to the scale of BROM 2 there is an opportunity to provide a full mix of uses to maximise sustainability and provide wider community benefit. Uses will include housing; employment; improved walk, cycle and public transport links; a local centre and retail and community facilities such as play facilities and sports pitches.

8.48 Sidemoor First School is located in the heart of BROM 2. It is therefore logical that the local centre is located in close proximity to the school to create a communal hub to the development where a range of services and facilities can complement each other. This should also include parking provision to cater not only for the local centre but also overflow parking for the school at busy times. To enhance the attractiveness of the proposed local centre some amenity green space should also be provided to create a 'village green' type setting.

8.49 All allotments in Bromsgrove are full and each has waiting lists for plots. The significant increase in population from this development would further increase the pressure for allotment space in the town. An allotment site should



therefore be included within the development. The most appropriate location would be adjacent to the 100% affordable housing scheme.

8.50 It has been identified that there is a specific requirement for adult football pitches due to increased participation in the Bromsgrove leagues. Provision would also need to include access, parking and changing facilities. It is preferable for these facilities to be concentrated in a single location on BROM 2 adjacent to the King George V playing fields.

8.51 It is preferable for the three expansion sites to include a small number of large play areas rather than a larger number of small play areas. This will enable a wider range of play equipment to be provided in selected locations that will be easier to maintain. It is however, important that all residents have access to such a facility within a 10 minute walk. The exact amounts of open space required on each site will depend upon the amount and type of dwellings proposed. Whilst the Council would expect the vast majority of provision to be provided on-site, some off-site commuted sums may be appropriate where a better outcome can be achieved through improvement or expansion of existing facilities such as at Sanders Park.

8.52 The development of these sites would make a significant contribution towards delivering locally identified housing targets. However, it is critical that in order to achieve these targets that new housing addresses local need rather than encouraging further in-migration into the District. Therefore detailed development proposals will need to conform with other policies in the Bromsgrove District Plan that focus on the delivery of 2 and 3 bedroom units and up to 40% affordable housing. Evidence gathered also identifies a need in the District for housing suitable for the elderly and this site provides an opportunity to address this need. Whilst building to Lifetime Home Standards ensures homes are compatible for the elderly there is also a need for more specialised accommodation such as an 'extra care' village that offers varying degrees of residential care. It is not only the type and size of dwellings that are important, they must also be of high quality design and be constructed in a sustainable way to maximise energy efficiency, embrace opportunities for renewable energy use and provide good accessibility to existing and/or proposed community facilities.

8.53 One of the key overarching objectives of all three sites is that the development should minimise the use of car based travel. This will require significant improvements to public transport and the improved provisions for walking and cycling.

8.54 The proximity of the motorway means that air and noise quality will be an issue that requires further investigation and mitigation. The sites (particularly BROM 1) are also located near to an Air Quality Management Area (AQMA) at junction 1 of the M42. The design of any new development will need to take the existence of the AQMA into full consideration to avoid any additional adverse impact.

## **Consultation Feedback**

8.55 A wide range of consultation responses were received in relation to the policy and in particular the choice of site allocations. Across all the sites a range of issues were raised including traffic congestion; lack of infrastructure; loss of greenfield land; impact on biodiversity and pollution. However, it is considered that many of the matters can be addressed through the implementation of this policy, for example, the policy seeks to retain important biodiversity features and implement a strategy to manage traffic. Planning contributions will be sought where appropriate to deliver new and improved infrastructure. It is acknowledged that development will result in the loss of greenfield land, however, there is a lack of suitable brownfield alternatives and there is a high level of housing need in the District. It is also important to note that the sites were identified as Areas of Development Restraint (ADR) in the Bromsgrove District Local Plan (Adopted 2004) which means that they were identified for future development and are not in the designated Green Belt.

8.56 Wording changes were also sought by some respondents to CP4A (now BDP5A). Some felt that criteria i to viii contained elements of repetition of either other Bromsgrove District Plan policies or national policy and were also too generic. Detailed local assessments have identified issues that are particularly relevant to the urban extensions and Officers therefore consider that it is important that these issues are addressed and dealt with strategically in the development of BROM 1, BROM 2 and BROM 3.

8.57 Other respondents considered that the criteria could delve into greater detail on issues such as highway improvements, ecological connectivity, SuDs and heritage assets. It was also suggested that the policy should seek to maintain 40% open space, set a maximum limit for retail floor space and remove the terminology 'landscape geodiversity features'. The Council made some of the proposed changes in relation to highway improvements and SuDs however some of the proposals were considered to create unnecessary duplication with other policies in the plan. The Council considered the imposition of a 40% open space target and a retail target was too prescriptive and could unduly constrain development.

8.58 The Council have continued to gather evidence in relation to the sites and engaged with relevant stakeholders which have resulted in minor changes to the capacities of each of the sites.

### **Sustainability Appraisal**

8.59 The policy performs well against a number of SA objectives for several reasons including the delivery of affordable housing, job creation and access to facilities and services. The policy performs less favourably against some of the environmental objectives due to the loss of greenfield land and the loss of high quality agricultural land. However, given the lack of brownfield alternatives available and the presence of much high quality of agricultural land around the town this is inevitable. The recommendation for mitigation is the creation of a detailed Masterplan that addresses a full range of issues including biodiversity and green infrastructure.

## **BDP5A) Bromsgrove Town Expansion Sites policy**

**BDP5A.1** The mixed use urban extension is proposed across three sites that will create a sustainable and balanced community that integrates into the existing residential areas of Bromsgrove. The development will fully address the social, economic and environmental aspects of sustainable development and will consist of approximately 2106 dwellings, 5 hectares of employment land, local centre(s), retail and community facilities.

**BDP5A.2** Of this total allocation BROM1 will include a minimum of 316 dwellings and associated community infrastructure that should include public open space with play facilities.

**BDP5A.3** BROM2 will contain a minimum of 1300 dwellings, 5 hectares of local employment land (office and/or light industry), a local centre and community facilities.

**BDP5A.4** A local centre should also be provided on BROM2 that provides a mix of retail and other A class uses. The local centre should be located adjacent to Sidemoor First School, include sufficient parking to cater for its own needs and also the school at busy times and amenity green space should also be provided.

**BDP5A.5** The community facilities should consist of a community hall, large equipped play areas, sports pitches and an allotment site. There is a specific requirement for adult football pitches adjacent to the King George V playing fields and associated infrastructure including access, parking and changing facilities should also be provided.

**BDP5A.6** BROM3 will include a minimum of 490 dwellings and associated community infrastructure that should include public open space with play facilities and small scale local retail.

**BDP5A.7** It is required that:

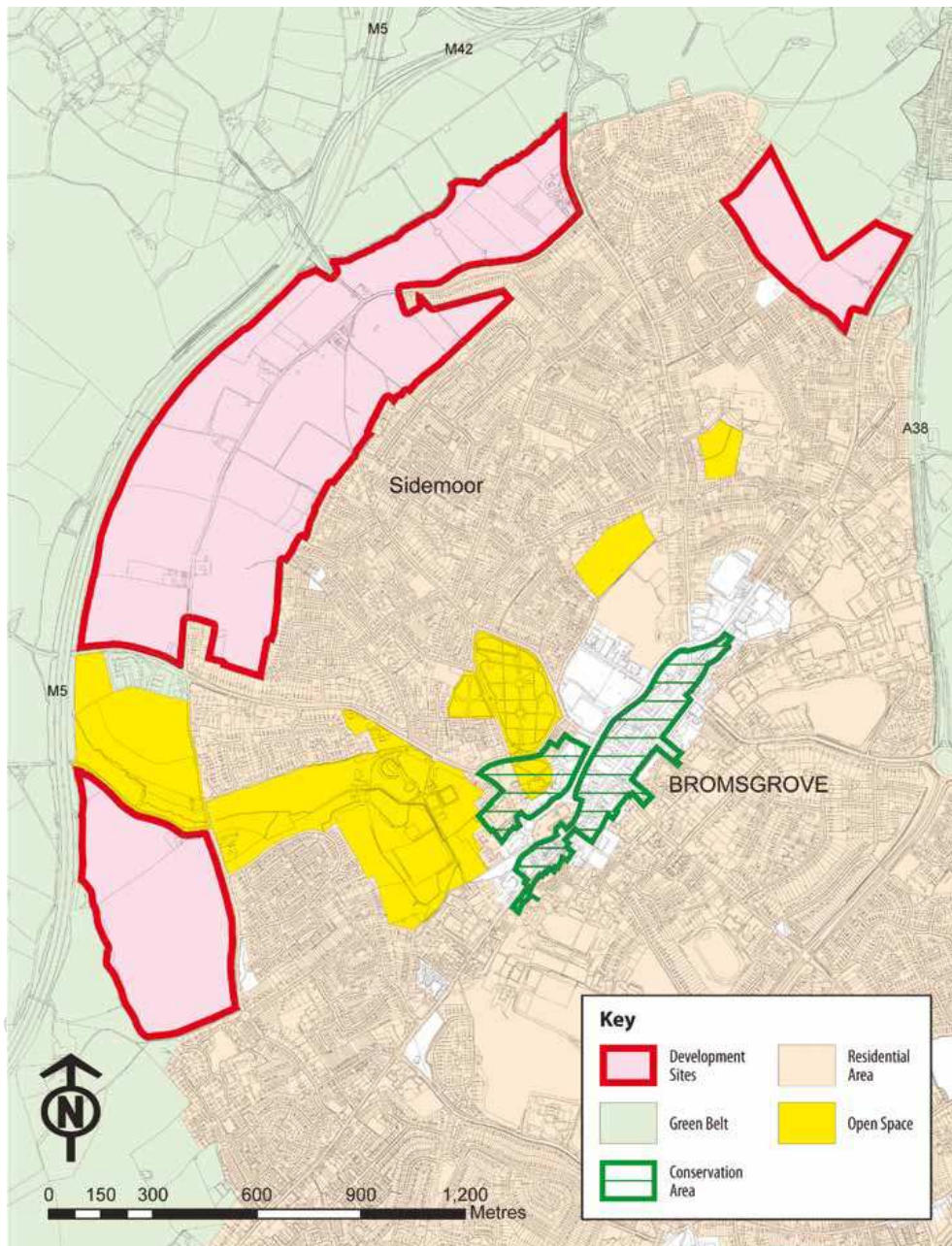
- a) The residential development reflects the local need of a high proportion of 2 and 3 bedroom properties and contains up to 40% affordable housing (which should include an appropriate mix of social rent, affordable rent and intermediate housing);
- b) To address the housing needs of the elderly all dwelling should seek to achieve Lifetime Home Standards and BROM2 should contain an 'extra care' type facility of approximately 200 units;
- c) An overall transport strategy will be developed that maximises opportunities for walking and cycling making full use of the Sustrans route No. 5 (in BROM2) and Monarch's Way (adjacent to BROM3);
- d) Significant improvements in passenger transport will be required including integrated and regular bus services connecting the new and existing residential areas to the railway station, with the Town Centre as the focal point of the network. In particular, a regular service

- should be routed through BROM2 and into the residential area of Sidemoor which would provide benefits for the wider community;
- e) It will be necessary to manage the cumulative traffic impact generated by the new developments following the implementation of measures which maximise the use of walk, cycle and passenger transport modes. All proposals must be subject to appropriate appraisal in consultation with Worcestershire County Council and consistent with LTP3 policies and design standards. Full consideration must be made of the impact on the wider transport network, including that managed by the Highways Agency;
  - f) Noise and air pollution emanating from the M5 and M42 will need to be addressed ensuring that sensitive land uses and the AQMA at junction 1 of the M42 are not unduly impacted upon;
  - g) All development must be of a high quality and locally distinctive to Bromsgrove, thereby enhancing the existing character and qualities that contribute to the town's identity and create a coherent sense of place. There should be a continuous network of streets creating a permeable layout and the use of continuous building lines to help define streets;
  - h) The development will need to reflect the topography of the sites, with built form avoiding the prominent ridgelines on both BROM1 and BROM3;
  - i) The sites will have an overall strategy for green infrastructure ( incorporating SuDS and blue infrastructure) that maximises opportunities for biodiversity and recreation throughout, creating a green corridor around the Battlefield Brook (BROM2) and in the case of BROM3, links to Sanders Park;
  - j) Important biodiversity habitats and landscape features should be retained and enhanced with any mitigation provided where necessary. There should be no net loss of hedgerow resource within the sites. Full account should be taken of protected and notable species (e.g badgers, reptiles, water voles and bats);
  - k) Flood risk from the Battlefield Brook on BROM2 and BROM3 should be addressed through flood management measures to protect and enhance the District's watercourses and enable development appropriate to the flood risk; and surface water run off must be managed to prevent flooding on and around all of the sites through the use of SuDS<sup>15</sup>. In accordance with the objectives of the Water Framework Directive, development should ideally enhance, or at least not worsen, water quality;
  - l) Sewerage capacity issues will be satisfactorily addressed in Bromsgrove Town through engagement with both Severn Trent Water Ltd and the Environment Agency;
  - m) The developments should seek to incorporate zero or low carbon energy generation technologies e.g Combined heat and power, ground source heat pumps and/or solar power; and
  - n) Financial contributions for infrastructure provision will be required as detailed in BDP6 Infrastructure Contributions.

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<sup>15</sup> Some SuDS will need to be approved by the Science Advisory Board (SAB)

## Map x Bromsgrove Town Expansion Sites



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### BDP5 B) Other Development Sites

8.60 As aforementioned the supply of brownfield land, identified within the Strategic Housing Land Availability Assessment (SHLAA), which is currently suitable and available for development is insufficient to meet locally identified housing targets. This means that greenfield sites will need to be released immediately to achieve a suitable supply of housing. This will initially be achieved through the allocation of expansion sites around Bromsgrove Town as outlined above. However, these sites alone will be insufficient to maintain a suitable supply throughout the plan period. They are also large sites which may be difficult to fully deliver in the short term. Other smaller greenfield sites, that

are highlighted in the SHLAA, will therefore ensure an adequate supply of land is maintained. These are primarily the areas that were reserved for future development in the Local Plan, formerly known as Areas of Development Restraint (ADR) and will now be referred to as 'development sites'<sup>16</sup>.

8.61 It should be stressed that these development sites are not designated as Green Belt land and are required as they will make a significant and cumulative contribution towards delivering locally identified housing targets. They are also located within or close to existing larger settlements which are considered to be sustainable locations and have a good range of existing services available, some of which include for example a railway station, schools and shops.

### **Alvechurch**

8.62 Two small development sites are located on the northern edge of the existing residential area of Alvechurch. The first site, which has an area of approximately 1.06 hectares, is located on the corner of Birmingham Road and Old Rectory Lane and is predominantly in agricultural use or is grassland. The second site has an area of around 0.6 hectares and is located to the rear of houses fronting Birmingham Road, with a branch of the Worcester and Birmingham canal located to the western boundary, as shown on map 2. At the time of writing outline planning permission for 25 dwellings has been granted for the Birmingham Road/ Rectory Lane site (13/0026). Land adjoining Crown Meadow, Birmingham Road, Alvechurch has full permission for 27 dwellings (11/0672) and is currently under construction

### **Barnt Green**

8.63 Also included in the list of other development sites is land at Barnt Green, identified as an 'unzoned area' in the Bromsgrove District Local Plan (BDLP). The site has a developable area of approximately 5 hectares (this excludes Cherry Hill Coppice, the Barnt Green Inn and the cricket pitch) and is identified on map 3. At the Public Inquiry held into the Proposed Modifications of the BDLP the Inspector identified that the site<sup>17</sup> at Barnt Green was a suitable location for some ADR provision. Following a High Court challenge whereby the views of the Inspector were upheld and after due consideration, BDC now concur with this view. The boundary of the site has been redrawn to show the developable area and the remaining 'unzoned land' has been placed into the Green Belt as it should have been shown previously on the Proposals Map. At the time of writing the site has outline planning permission for 88 dwellings (11/0741).

### **Catshill**

8.64 This site is located to the north western edge of the residential area of Catshill, to the rear of houses fronting Stourbridge Road and bounded in part to the north by the M5. It totals some 6.04 hectares in area, is vacant and has a watercourse running through it, together with associated flood plain and is shown in map 4. This site now has reserved matters planning permission for 80 dwellings (12/0586).

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<sup>16</sup> Please see individual plans showing the boundaries of each development site

<sup>17</sup> As shown on plan

### **Frankley**

8.65 This site is located close to the boundary with Birmingham in the north western sector of the District. The site is approximately 6.66 hectares in area and is currently vacant. Restrictive covenants affect the site which limit both its use and developable area (See map 5).

### **Hagley**

8.66 This large site, located to the south of Kidderminster Road (A456) and to the west of the A491, is almost 22 hectares in area, as indicated on map 6. It is predominantly agricultural land with some residential development to the southern end of the site. Gallows Brook bisects the site. It is considered that this site could provide a sustainable mixed use development comprising community leisure, employment and residential development. The site is made up of 4 portions. At the time of writing one portion has outline planning permission for 175 dwellings (12/0593), outline planning permission for 70 dwellings has been approved on another portion (12/0875), 38 dwellings are expected from the appeal site at Brook Crescent, whilst the remainder has capacity for approximately 18 dwellings.

### **Ravensbank expansion site**

8.67 This site is located to the south/east of the existing Ravensbank employment site and is approximately 10 hectares in area, as indicated on map 7. The original employment site caters for Redditch Borough's needs and it is envisaged that this expansion site will provide additional capacity for Redditch's future needs on a similar basis. This site is part of the Redditch Eastern Gateway, a strategic employment site, which is being promoted by the Worcestershire Local Enterprise Partnership.

### **Wagon works/St Godwalds Road**

8.68 This development site is located south of existing residential development at Scaife Road, south/west of St Godwalds Road and in relative close proximity to Bromsgrove railway station, as shown on map 8. This site comprises almost 8 hectares of land and has planning permission for 181 dwellings following a reserved matters application (12/0708).

### **Wythall**

8.69 Comprises two development sites located to the north (Bleakhouse Farm) and east (Selsdon Close) respectively of the existing residential area at Wythall, as shown on map 9. The first site is approximately 6.3 hectares in area and the second smaller site has an area of approximately 3.1 hectares. At the time of writing the land at Bleakhouse Farm has outline planning permission for 178 dwellings (12/0912). Selsdon Close has planning permission and 76 homes are now under construction.

### **Consultation Feedback**

8.70 A wide range of consultation responses were received in relation to this policy and in particular the choice of site allocations. Across all the sites a range of issues were raised including traffic congestion, lack of infrastructure, loss of greenfield land, impact on biodiversity and air quality. It is considered that



many of the matters can be addressed through the implementation of the District Plan as a whole which, for example, seeks to address noise and pollution issues, retain important biodiversity (as part of Green Infrastructure) and implement a strategy to manage traffic. Planning contributions will be sought where appropriate to deliver new and improved infrastructure. It is acknowledged that development will result in the loss of greenfield land, however, there is a lack of suitable brownfield alternatives and there is a high level of housing need in the District.

8.71 Wording changes were also sought by some respondents to ensure development sites:

- Allow flexibility as to how the 40% affordable housing is allocated.
- Reflect and incorporate flood management measures to protect and enhance the District's watercourses
- Retain and enhance Green Infrastructure and incorporate SuDS

8.72 Many of the proposed changes were appropriate however these amendments were considered to create unnecessary duplication with other policies in the plan.

8.73 Concern was raised regarding the loss of certain assets, such as the cricket pitch and Barnt Green Inn on Barnt Green development site, which was never the intention but was not clear in the Plan. Therefore the Barnt Green development site map has been amended to clarify the specific developable area.

8.74 The Catshill development site boundary map has been amended to reflect what is considered to be the developable area.

8.75 The Council recognise the importance of continuing to liaise with relevant stakeholders to discuss any further site issues.

8.76 Submissions for alternative sites were received, predominately for Green Belt sites which would be considered in the event of a Green Belt review. The Council will continue to gather information from developers regarding realistic capacities and delivery time scales for sites and update the SHLAA and subsequent versions of the Plan accordingly.

### **Sustainability Appraisal**

8.77 The policy performs well against a number of SA objectives for several reasons including the delivery of affordable housing, job creation and access to facilities and services. The policy performs less favourably against some of the environmental objectives due to the loss of greenfield land. However, the proposals do not result in the loss of Green belt land. Given the lack of brownfield alternatives available within the District the loss of some greenfield land is inevitable. The recommendation for mitigation is the creation of a detailed Masterplan that addresses a full range of issues including biodiversity and green infrastructure.



## BDP5 B) Other Development Sites Policy

BDP5B Table 3 highlights development sites which will contribute to housing needs in Bromsgrove District for the period 2011-2030. The table identifies the potential capacities on each site and sites which have already received planning permission.

**Table 3 Scale of Development**

Development Sites	Map No.	Area (hectares)	Suitable use	Potential capacity	Received permission
<b>Alvechurch</b>					
<b>Land Adjoining Crown Meadow</b>	<b>2</b>	<b>0.6</b>	<b>housing</b>	<b>27</b>	<b>27</b>
<b>Birmingham Road/ Rectory Lane</b>	<b>2</b>	<b>1.06</b>	<b>housing</b>	<b>25</b>	<b>25</b>
<b>Barnt Green</b>	<b>3</b>	<b>5</b>	<b>housing</b>	<b>88</b>	<b>88</b>
<b>Catshill</b>	<b>4</b>	<b>6.04</b>	<b>housing</b>	<b>80</b>	<b>80</b>
<b>Frankley</b>	<b>9</b>	<b>6.6</b>	<b>open space/housing</b>	<b>66<sup>18</sup></b>	<b>-</b>
<b>Hagley</b>	<b>5</b>	<b>21.9</b>	<b>mixed use<sup>19</sup> - community leisure/employment/residential</b>	<b>301<sup>20</sup></b>	<b>273</b>
<b>Ravensbank expansion site (for Redditch's needs)</b>	<b>8</b>	<b>10.3</b>	<b>employment</b>	<b>-</b>	<b>-</b>
<b>Wagon works/St Godwalds Road</b>	<b>6</b>	<b>7.8</b>	<b>housing</b>	<b>181</b>	<b>181</b>
<b>Wythall</b>					
<b>Selsdon Close</b>	<b>7</b>	<b>3.1</b>	<b>housing</b>	<b>76</b>	<b>76</b>

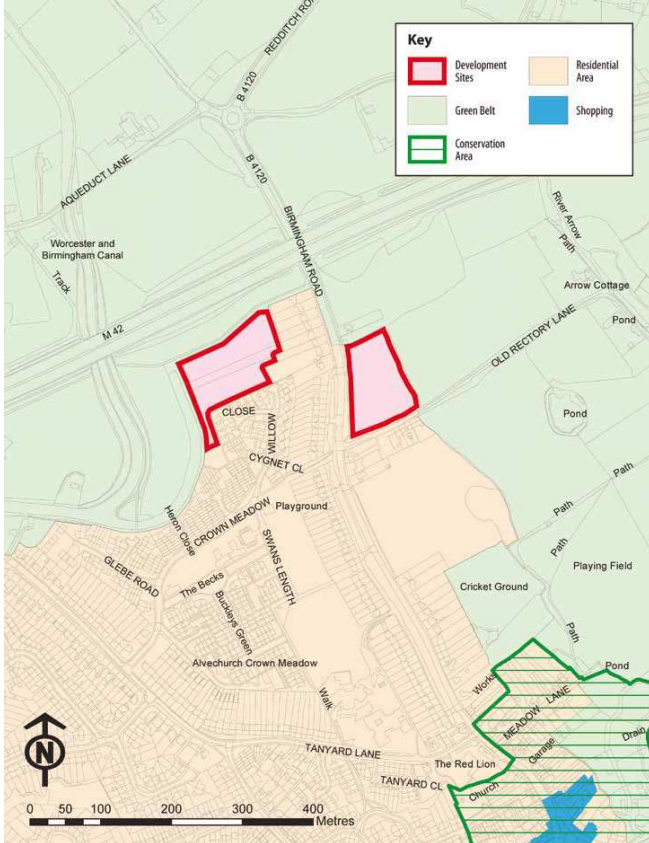
<sup>18</sup> The site has some protection in terms of open space and also has restrictive covenants which limit its use and developable area.

<sup>19</sup> As combined area of sites is significantly greater than other areas, a mixed use development here is considered a more sustainable option. Sites could be developed in various proportions for community leisure, employment and residential uses.

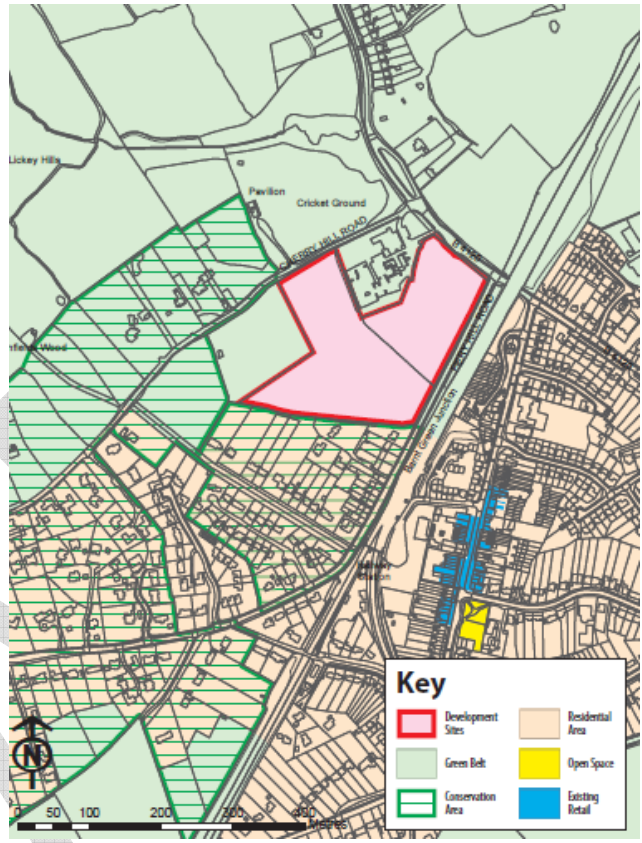
<sup>20</sup> Potential capacity of 301 is made up by 4 portions; 175 homes have outline planning approval, 70 dwellings outline planning approval from the Western Road portion, 38 dwellings from the appeal site at Brook Crescent and a further 18 dwellings expected on the remainder.

<b>Bleakhouse Farm</b>	<b>7</b>	<b>6.3</b>	<b>housing</b>	<b>178</b>	<b>178</b>
<b>TOTALS</b>		<b>68.7</b>		<b>1022</b>	<b>938</b>

**Map 2 Alvechurch Development Sites**

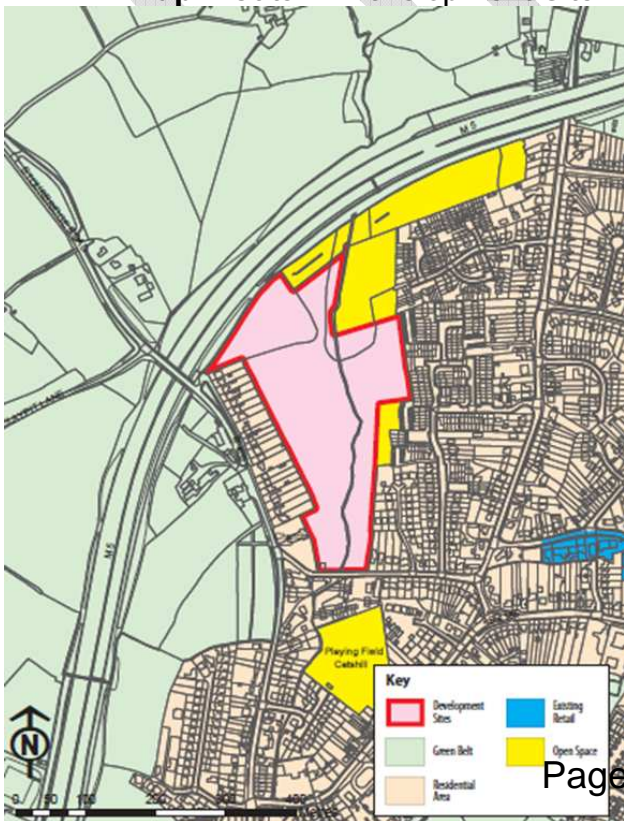


**Map 3 Barnt Green Development**

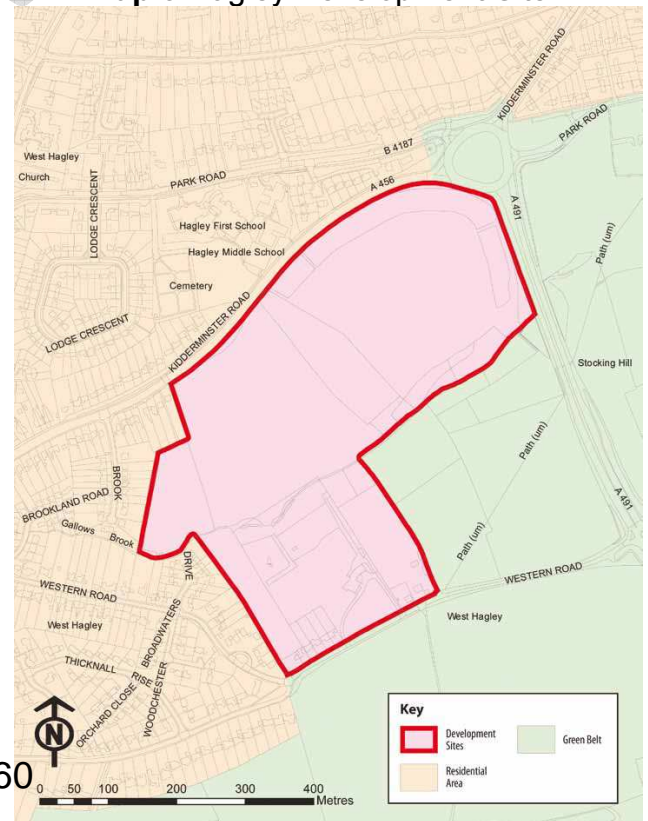


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**Map 4 Catshill Development Site**



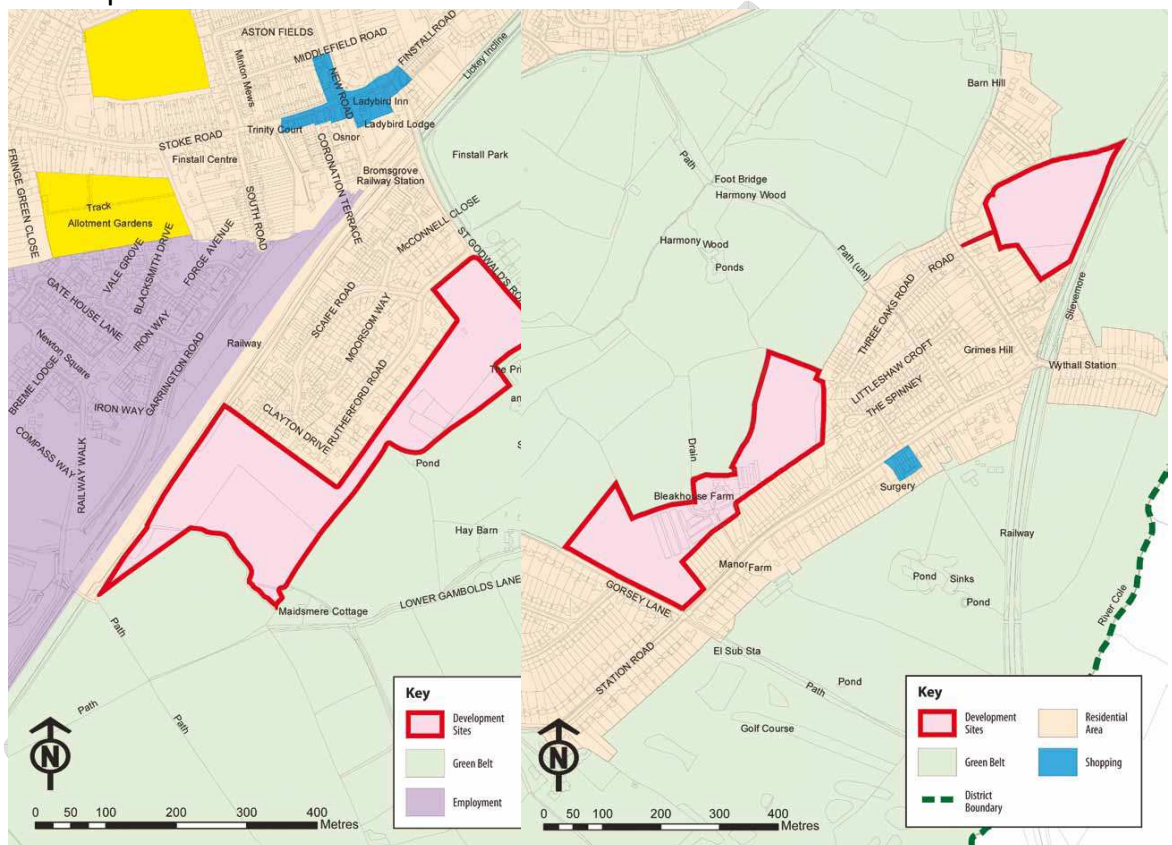
**Map 5 Hagley Development Site**



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**Map 6** Wagon Works Development Site  
 Development Sites

**Map 7** Wythall

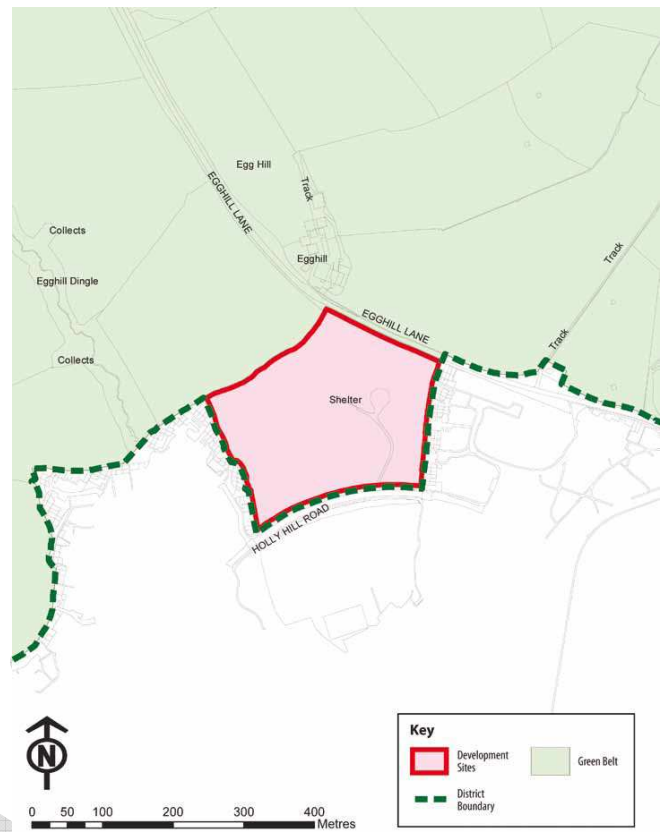
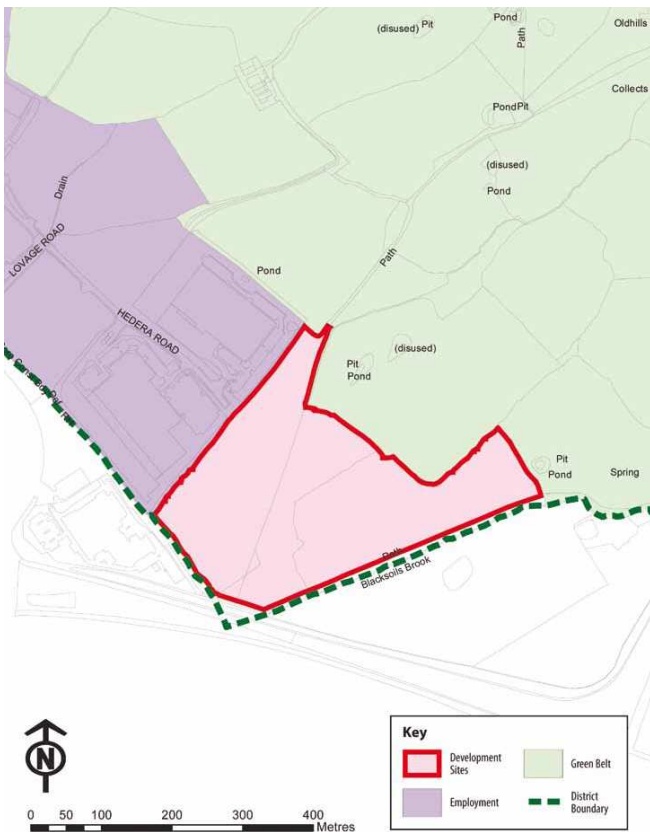


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**Map 8** Ravensbank Expansion Site  
 Development Site

**Map 9** Frankley





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## RCBD1 Redditch Cross Boundary Development

RCBD1.1 The Worcestershire Strategic Housing Market Assessment (SHMA) identifies that Redditch's housing requirements up to 2030 should be around 6,380 dwellings. The Redditch Strategic Housing Land Availability Assessment (SHLAA) identifies that Redditch Borough only has the capacity to accommodate around 3000 dwellings within its own boundaries, leaving a shortfall of around 3400. Bromsgrove District Council and Redditch Borough Council have worked together in accordance with the Duty to Cooperate to find preferred locations to accommodate this shortfall. An assessment (Housing Growth Development Study January 2013) has been carried out, building upon a consultation conducted in 2010, to ensure that the most suitable and sustainable sites have been selected.

RCBD1.2 Two sustainable mixed use urban extensions (Foxlyidate and Brockhill) are proposed adjacent to the west and north of Redditch Town which will deliver two new sustainable communities. The two development sites, as shown on Page X, will provide a minimum of 3400 dwellings and comprehensive provision of associated new infrastructure to meet some of Redditch's housing requirements up to 2030. These sites are currently designated as Green Belt; however exceptional circumstances exist to allocate these sites to meet development needs. These developments will create balanced communities that fully integrate into the existing residential areas of Redditch, addressing the social, economic and environmental elements of

sustainable development, whilst being sympathetic to the surrounding rural areas of Bromsgrove.

**RCBD1.3 Site 1 Foxlydiate** is located to the north western side of Redditch within the Parish of Bentley Pauncefoot and will provide opportunities to improve facilities and services in the wider Webheath area. It also offers the opportunity to extend existing bus services and through the provision of facilities within development has the potential to reduce the need to travel.

**RCBD1.4 Site 2 Brockhill** is located to the north of Redditch, partly within the Parish of Tutnall and Cobley, has good access to Redditch Town Centre, is well served by existing bus routes and has employment close by.

#### **RCBD1.5.1 Consultation Feedback**

A wide range of consultation responses were received in relation to the policy and in particular the choice of site allocations. Across all of the sites a range of issues were raised including traffic congestion, lack of infrastructure, loss of greenfield/Green Belt land, impact on biodiversity and pollution. However, it is considered that many of the matters can be addressed through the implementation of this policy, for example the policy seeks to retain important biodiversity features and implement a strategy to manage traffic. Some infrastructure requirements will be provided as part of any new development and where appropriate planning contributions will be sought to deliver new and improved infrastructure. It is acknowledged that development will result in the loss of greenfield and Green Belt land, however there is a lack of suitable brownfield alternatives and there is a high level of unmet housing need in the Borough.

#### **RCBD1.5.2 Sustainability Appraisal**

The policy performs well against a number of SA objectives for several reasons including the delivery of affordable housing, job creation and access to facilities and services. The policy performs less favourably against some of the environmental objectives due to the loss of greenfield and Green Belt land. However, given the lack of brownfield alternatives available this is inevitable. The recommendation for mitigation is the creation of a detailed Masterplan that addresses a full range of issues including biodiversity and green infrastructure.

#### **RCBD1.1 Redditch Cross Boundary Development**

**RCBD1.6 Two mixed use urban extensions are proposed (as shown on Map RCBD1 X) across two sites adjacent to Redditch and are appropriate to deliver a minimum of 3400 dwellings and comprehensive provision of associated new infrastructure to meet some of Redditch's housing requirements up to 2030.**

**RCBD1.7 Site 1 Foxlydiate will include a minimum of 2800 dwellings, a first school and a Local Centre, including associated community infrastructure.**

**RCBD1.8 Site 2 Brockhill will contain a minimum of 600 dwellings which will integrate with the Strategic Site at Brockhill East, as shown in the Redditch Local Plan No.4 and should integrate well into the existing urban fabric of Redditch.**

**RCBD1.9 In order to achieve these sustainable new communities all aspects of the delivery of the urban extensions must be in accordance with the Policies contained within the Bromsgrove Development Plan and any other relevant Policies. In addition, it is a requirement that the following principles are applied to both sites:**

**RCBD1.10 The residential development will reflect the local requirements as detailed in the most up-to-date Housing Market Assessment and comprise of up to 40% affordable housing with a flexible mix of house types and tenures.**

**RCBD1.11 An overall Transport Assessment will be produced taking into account the cumulative and wide ranging effects of development on transport infrastructure including new and improved access arrangements, which are in keeping with the structured road hierarchy.**

**RCBD1.12 Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both Site 1 Foxlydiate and Site 2 Brockhill, with all dwellings to be located within 250m of a bus stop.**

**RCBD1.13 Walking and cycling routes should be well integrated with the Green Infrastructure Network. Site 1 Foxlydiate should make full use of existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch's Way and Site 2 Brockhill should create routes.**

**RCBD1.14 Both sites will have an overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity. Green Corridors should be created around Spring Brook in Site 1 Foxlydiate and the Red Ditch in Site 2 Brockhill. Both sites should be sensitively designed to integrate with the surrounding existing environment and landscape. In particular, development should be respectful and sympathetic to the topography of the sites, with no development on prominent ridge lines and where appropriate retain tree lined boundaries.**

**RCBD1.15 Flood risk from the Spring Brook on Site 1 Foxlydiate and the Red Ditch on Site 2 Brockhill East should be managed through measures that work with natural processes to improve the local water environment. Surface water runoff must be managed to prevent flooding on, around and downstream of the both sites through the use of Sustainable Drainage Systems (SuDS). A supporting risk assessment will be provided as SuDS**

techniques may be limited due to Source Protection Zones within Site 1 Foxlydiate.

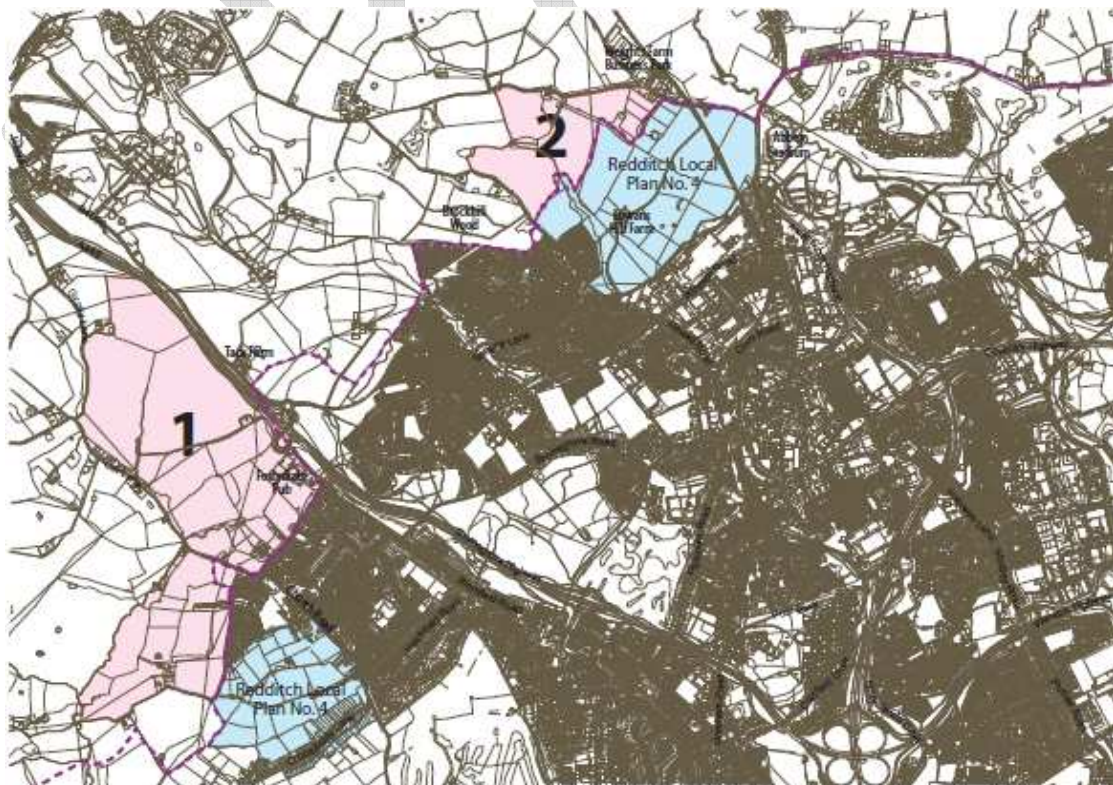
**RCBD1.16** Proposals for development will need to ensure that sufficient capacity of the sewerage systems for both wastewater collection and treatment is provided through engagement with Severn Trent Water Ltd and the Environment Agency and delivered at the appropriate stage.

**RCBD1.17** All development must be of a high quality design and locally distinctive to its surrounding rural and urban character; contribute to the areas' identity and create a coherent sense of place; and respect and enhance the setting of any heritage asset. There should be a continuous network of streets and spaces, including the provision of public open spaces, creating a permeable layout with well-defined streets.

**RCBD1.18** In preparing development proposals, provision should be made for any necessary infrastructure for the effective delivery of the site.

**RCBD1.19** Any proposals for development on either site must not individually or cumulatively jeopardise the future use of any other part of the site (s) or impede the delivery of the two sustainable communities.

**RCBD policies map (map below to be replaced with excerpt of final policies map)**



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## **BDP6 Infrastructure Contributions**

8.78 The Infrastructure Delivery Plan (IDP) will identify the required infrastructure to ensure that the Plan is deliverable. Development often has an impact on service provision and requires new infrastructure to be provided. It is therefore considered reasonable that developers contribute towards new and/or improved infrastructure that is designed to mitigate these impacts provided that this does not affect the viability of the proposed scheme. It is considered that adequate infrastructure should be provided to support new development at an appropriate stage. **Contributions from a particular development will be fairly and reasonably related in scale and kind to the relevant scheme.** The Council will work in partnership with infrastructure providers, grant funders and other delivery agencies in seeking the provision of the necessary infrastructure to support new development.

8.79 The principle of securing developer contributions towards infrastructure in order to mitigate against the impact of development is a well-established process. The conventional approach towards securing such contributions in the past has been based on negotiations formalised through S106 agreements. It is however envisaged that a standard charge would be levied on all new development as has been practiced on various schemes around the country. This does not mean that planning obligations will cease to be used as there will, in certain circumstances, be site specific issues that can only be mitigated through a S106 agreement. The IDP will be used as part of the evidence base to support the Community Infrastructure Levy (CIL) charging schedule. The IDP will be a 'live' document that will be updated through the Plan Period to reflect new information and/or requirements.

8.80 Worcestershire County Council, in conjunction with the six Worcestershire local authorities, has commissioned consultants to undertake CIL viability work and it is envisaged this work will underpin the charging schedules of the individual authorities. The shared evidence base will provide Bromsgrove District Council with the opportunity to set our own tariff rates to ensure that viability is maintained. Once a draft CIL charging schedule is prepared it will be consulted upon for 4 weeks and will go through an independent public examination process before being formally adopted by the Council.

### **Consultation Feedback**

8.81 From previous consultations there was support for the development of a CIL in the District, although it was highlighted that economic viability was fundamental. With Consultants being employed to address viability it is considered that this concern has been satisfactorily addressed.

8.82 Concerns were raised about the second paragraph of the DCS2 policy where it stated that all forms of development should aim to benefit the local community taking account of its needs and aspirations. It was considered that this goes beyond the realm of what is permitted by relevant legislation; however



the Council considers that most developments provide direct benefits through the creation of new homes or jobs and therefore the policy does not place an unreasonable burden on applicants. Whilst the wording has now been removed from the policy the reference to an improved quality of life for residents still maintains the stance of delivering a net benefit.

8.83 Some felt the policy could be written in a more flexible way highlighting that contributions could go directly to local communities or Parishes as deemed appropriate. It was also considered necessary by some to highlight that any money should be spent within 5 years and if not returned to the developer. The Council recognises the validity of the points raised but considers these matters should be addressed within the CIL as the document progresses and will in any case be governed by the CIL Regulations.

8.84 There were requests for additional information to be included in the policy. Several respondents felt that Green Infrastructure should be highlighted as a possible area for contributions. Whilst the Council agree that Green Infrastructure could be a possible area for contributions a definitive list of possible areas for contribution is no longer included in the policy. This is considered to be more flexible and will not impede the process of developing a charging schedule within the CIL. It was also felt by some that the New Homes Bonus (NHB) and Tax Increment Financing (TIF) could also be mentioned. The Council considers that NHB and TIF are not planning obligations and therefore have not included references to these in this policy.

### **Sustainability Appraisal**

8.85 In terms of the sustainability appraisal the policy performed strongly against social, environmental and economic objectives due to the overarching nature of the benefits of contributions. No mitigation was identified for this policy.

### **BDP6 Infrastructure Contributions**

**Development and infrastructure provision will be coordinated to ensure that growth in the District is supported by the provision of infrastructure, services and facilities needed to maintain and improve quality of life and respond to the needs of the local economy. This will be documented in the Infrastructure Delivery Plan.**

**Irrespective of size, development will provide, or contribute towards the provision of:**

- **Measures to directly mitigate its impact, either geographically or functionally, which will be secured through the use of planning obligations;**
- **Infrastructure, facilities and services required to support growth which will be secured through a Community Infrastructure Levy (CIL)**

**Contributions through CIL will be required once the charging schedule has been through an independent public examination and has been formally adopted by the Council.**

### **8.86 No Place like Home**

BDP 7 Housing Mix and Density

BDP 8 Affordable Housing

BDP 9 Rural Exception Sites

BDP 10 Homes for the Elderly

BDP 11 Accommodation for Gypsies, Travellers and Showpeople

BDP 12 Sustainable Communities

This section of the Plan covers the housing policies. It includes policies which aim to ensure that all of the identified housing needs of the District are met. It also aims to ensure the efficient use of land whilst protecting the unique character of Bromsgrove's diverse settlements. It seeks to ensure that people also have access to local services that reflect their needs.

### **BDP7 Housing Mix and Density**

8.87 Proposals for housing must take account of identified housing needs in terms of size, type and tenure of dwellings. These needs will include an appropriate provision for all sectors of the community.

8.88 National guidance seeks to ensure that a mix of different housing types is achieved across the plan area to meet the needs of the community. Household needs within Bromsgrove District are varied and include requirements for singles, couples, families, gypsies and travellers, the young, the elderly as well as a requirement for affordable housing. Some of these specific requirements are addressed in separate policies of this Plan including; Affordable Housing (BDP8), Homes for the Elderly (BDP10) and Accommodation for Gypsies, Travellers and Travelling Showpeople (BDP11).

8.89 The wide-ranging changes introduced under the Localism Act 2011, and the Welfare Reform Act 2012, will impact on supply and demand for affordable housing in the District, and these changes will inevitably affect size, type and tenure mix, all of which will need to be catered for in the delivery of future affordable housing options for local people.

8.90 There are also various households with special needs including disabled people with physical and/or sensory impairments, learning difficulties and mental health needs. Other household needs may include groups requiring supported accommodation such as Black and Asian Minority Ethnic groups, and travelling populations. Household sizes required to address these needs range from 1-bed to 4/5-bed properties, and the types and style of accommodation will include a diverse mix of flats, houses and bungalows.

8.91 In line with national trends Bromsgrove has an ageing population. The 2012 Worcestershire Strategic Housing Market Assessment (SHMA) identifies

that the proportion of older person households (those over the current working age) is forecast to grow from 21.4% to around 33% of the total population. This analysis suggests that there will be high demand for smaller properties suitable for meeting the needs of older person households.

8.92 Whilst the number of family households is set to decline overall it is important to recognise that this is not true for all age groupings, with notable increases in the number of family households where the head of the household is aged between 25-34 and 45-49. It is therefore considered that there is likely to be a sustained demand for family housing recognising that moderate and larger properties represent the aspiration for many households of different age-groups.

8.93 However, it is important to note that Bromsgrove has a high proportion of large 4 and 5 bedroom homes. In order to help redress the balance between large homes currently available and the ageing population there needs to be a significant change in building patterns across the District to provide realistic alternatives for the increasing elderly population.

8.94 Land is a finite resource and in a District with limited potential for brownfield redevelopment, it is important that any use of greenfield sites is minimised. The level of development on sites should therefore be maximised without compromising the quality of housing development. It is important to remember that density is an outcome of the design process and not a determinant. Whilst it is important to make the best use of land this does not override the requirements of achieving high quality design that reflects the characteristics of the surrounding area in accordance with policy BDP19 High Quality Design.

### **Consultation Feedback**

8.95 There was support for the policy although some thought it was inflexible and too prescriptive. It was felt that the Council should be trying to deliver a wider mix of homes reflecting need, demand and the existing mix of dwellings. The evidence supporting a focus on smaller dwellings was questioned as developers argued that people tend to buy the largest property that they can afford rather than buying to meet actual needs. It was considered that trying to micro-manage supply in such a way could compound affordability problems. The Council considers that there are already a high proportion of larger dwellings in the District and therefore it is essential to build smaller dwellings to meet the needs of first time buyers and people of retirement age. It is considered that the policy is sufficiently flexible to deliver a wide range of dwellings across the plan period.

8.96 Some respondents felt that a density target was unnecessary as they felt that planning should be design-led instead. It was considered that applying a density target could constrain the quality of a development. In a District that is 91% Green Belt it is essential to make prudent use of land to minimise Green Belt release in the future. However, the Council recognises the importance of having a design-led approach and therefore density targets have been

removed. The emphasis is now on making efficient use of land whilst achieving a high quality design outcomes without imposing prescriptive density targets.

## **Sustainability Appraisal**

8.97 The Policy was assessed within the Sustainability Appraisal and performs well against a number of social and environmental objectives due to its emphasis on meeting housing needs, creating mixed and balanced communities and minimising the use of greenfield land. No weaknesses were identified.

### **BDP7 Housing Mix and Density**

**BDP7.1 Proposals for housing must take account of identified housing needs in terms of the size and type of dwellings. To ensure mixed and vibrant communities are created development proposals need to focus on delivering 2 and 3 bedroom properties. On large schemes it is accepted that a wider mix of dwelling types will be required.**

**BDP7.2 The density of new housing will make the most efficient use of land whilst maintaining character and local distinctiveness and therefore should fully accord with BDP19 High Quality Design.**

### **BDP8 Affordable Housing**

8.98 Bromsgrove has some of the highest house prices in Worcestershire and a very high level of homeownership, with only 10.6% of homes in the District socially rented. This combination of factors means that there is a significant unmet demand for affordable housing.

8.90 Over recent years several studies have identified that there is a requirement for greater levels of affordable housing in the District, including the Housing Needs Study (2004), The South Housing Market Area Assessment (2007), Bromsgrove Housing Market Assessment (2008) and most recently the Worcestershire Strategic Housing Market Assessment (2012). This latest Assessment identifies that there is a need for homes of all sizes with the greatest need for 1 and 2 bedroom properties.

8.91 One of the key findings of the Worcestershire Strategic Housing Market Assessment (SHMA) is that 57% of households are unable to afford to purchase or rent on the open market in Bromsgrove District. This means that many local people have been forced to seek more affordable housing outside of the District. The knock-on effect of this is that many people who work in the District commute in daily, this is clearly not sustainable. Increased affordable housing provision will help to reduce this trend.

8.92 The SHMA has identified that a total of 219 new affordable dwellings are required each year over the next 5 years to meet affordable housing needs. This is considered to be a challenging target which, if not met, will lead to

further increases in the need for affordable housing in the future unless market conditions change significantly. The Council together with other partners will seek to increase the annual provision of affordable housing to reduce the level of unmet annual need. It will endeavour to do so through the creation of mixed communities where a range of housing types and tenures are available.

8.93 The SHMA identified the sizes of dwellings required to meet local needs by analysing the size of households in 'significant need' on the Council's waiting list. It highlights that there is greatest need for smaller properties reflecting the reduction in the size of the average household both locally and nationally.

8.94 The definition of affordable housing within Annex 2 of the NPPF highlights that there are a range of products available including social rented, intermediate housing and affordable rent. It is considered that affordable rent can make a useful contribution to affordable housing provision in the District but the Worcestershire SHMA identifies that 35% of households in the District would be unable to afford 80% of local market rents. It is therefore apparent that a significant proportion of new affordable housing stock will still need to be social rented.

8.95 The Council is undertaking a review of its involvement in the county-wide choice-based lettings approach, including whether the common allocation policy is the best way of determining need in the District. The Council has also adopted the power, available under the Localism Act, to discharge homelessness duties into the private sector. These two developments may lead to significant changes in both the assessment of housing need in Bromsgrove, and the way in which this need is addressed, both of which will need to be factored into supply and demand projections in the future. It is therefore essential to take a flexible approach to tenure split via consideration on a site-by-site basis.

8.96 With undisputed high levels of need for affordable housing it is essential that levels of affordable housing delivered are maximised but this needs to be balanced against ensuring that any targets and thresholds set are viable to ensure that housing is delivered. The Council therefore completed an Affordable Housing Viability Assessment (AHVA). The study tested a wide range of scenarios taking into account a variety of development costs. The key recommendations from the report have helped to inform this policy. The evidence highlights that the Council's aspiration of achieve 40% affordable provision on-site is achievable in most circumstances.

8.97 All affordable housing provided should seek to achieve high standards of design in accordance with BDP19 High Quality Design and should successfully integrate into housing developments. It is therefore essential that affordable housing is distributed throughout schemes and should not be distinguishable from market housing.

## **Consultation Feedback**

8.98 Consultation feedback highlighted that there was widespread support for the policy on affordable housing although some concerns were raised. It was identified by some respondents that the policy should be supported by up-to-date evidence. Following the completion of the Affordable Housing Viability Assessment and the Worcestershire SHMA this matter has been addressed and the policy has been amended to reflect this robust and up to date evidence.

8.99 Some felt that the policy was too prescriptive and should be more flexible in terms of the percentage target and the mix and tenure of affordable units to be provided. The Council acknowledges that it is important to be flexible with the tenure mix to ensure that the types of homes needed most in a community are delivered. Therefore the tenure mix and dwelling sizes is now proposed to be negotiated on a site by site basis.

8.90 Some respondents felt that the policy should mention affordable rent as a type of affordable housing. The Council agreed with this comment and a reference to affordable rent is now included.

8.91 Some felt that clarity was needed as to whether the policy only applied to the net gain in dwellings whilst others felt an SPD was needed to provide further clarity and detail generally. The Council considered that the policy already provided clarity on the issue of net gain and generally the policy provided sufficient detail so that an SPD may not be required in the future.

### **Sustainability Appraisal**

8.92 The assessment of the policy within the Sustainability Appraisal has identified that the policy performs well against some of the social objectives due to the delivery of affordable housing and the creation of mixed and balanced communities. Due to the nature of the District, some the affordable housing will be on greenfield land meaning the policy performs poorly against some of the environmental objectives.

### **BDP8 Affordable Housing**

**Where there is a net increase of 10 or more dwellings or the site is equal to or greater than 0.4 hectares, affordable housing provision will be expected on-site and will be calculated against the net number of new dwellings as follows:**

- **Up to 40% affordable housing on greenfield sites or any site accommodating 200 or more dwellings;**
- **Up to 30% affordable housing on brownfield sites accommodating less than 200 dwellings**

**In exceptional circumstances where the applicant can fully demonstrate that the required target cannot be achieved the Council may negotiate a lower provision.**

**The Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking into account local needs, the housing mix in the local area and the impact on viability. A mix of the following tenures will generally be sought:**

- **Social rented;**
- **Intermediate housing; and**
- **Affordable rent**

**The affordable housing element of developments should focus primarily on the delivery of smaller units. However, there may be locations or changes in market conditions that warrant a different breakdown to deliver a scheme that best meets local needs in relation to the relevant settlement. The precise mix to be provided should be developed through discussions with the Strategic Housing Team.**

**To help meet the needs of the elderly all homes should be built to Lifetime Homes Standards in accordance with BDP10 Homes for the Elderly.**

**To create mixed and balanced communities affordable housing should be distributed throughout new developments and not be visually distinguishable from market housing.**

**When a development site is brought forward for planning consent on a piecemeal basis i.e. involving a parcel of land for development which is part of a larger site, Bromsgrove District Council will assess 'affordable housing' targets for each part of the site on a pro-rata basis having regard to the overall requirements generated by the whole site.**

### **BDP9 Rural Exception Sites**

8.93 The Worcestershire SHMA identifies that there is a need for affordable housing across the District in both urban and rural areas. This is partly due to the fact that the supply of new affordable homes has been unable to keep up with levels of need, particularly in rural areas and also the disparity between average house prices and average household earnings. The average house price in Bromsgrove District is £238,935 (December 2012), which is significantly higher than the Worcestershire average of £204,286. In the more rural parts of the District the average house price is much higher, meaning that in some cases the median average house price exceeds the median household income by nine times, which is a notably high affordability ratio. With the current provision of affordable housing very limited in many rural areas some residents have little option but to look for more affordable housing outside their Parish and in some cases outside Bromsgrove District.

8.94 The Council will therefore support rural exception schemes where a need has been robustly identified through a recent local housing needs survey. Any survey will need to identify a genuine need to live within a settlement and prove a financial need for the affordable housing. Data should also be gathered to ascertain the type and size of dwellings required. Where exception schemes are approved the Council's Local Lettings Criteria will be applied to ensure that

homes are provided in the first instance to residents of the relevant Parish within which the scheme is located.

8.95 To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. There is a preference for sites within settlements although, where this is not possible, sites adjacent to rural settlements will be acceptable where there is good access to local facilities and it does not conflict with other policies within the Plan.

8.96 To help address the need for affordable housing the Council would generally expect schemes to be for 100% affordable housing. Although, where this makes a scheme unviable an element of market housing will be acceptable when robustly justified by a viability appraisal. However, it is essential that the majority of the scheme consists of affordable housing. It should be shown through the viability appraisal that the market housing element of the scheme provides the required level of cross-subsidy for the affordable housing without leaving a residual profit for the developer.

8.97 The settlement hierarchy (BDP2) sets out the types of uses that are generally acceptable within each tier of the hierarchy. It highlights that rural exception schemes are not appropriate in Bromsgrove Town or large settlements. The settlements of Bromsgrove Town, Alvechurch, Barnt Green, Catshill, Hagley, and Wythall all contain sites allocated within this plan which will deliver up to 40% affordable housing. This will ensure that there will be a significant contribution to affordable housing delivery within each of these settlements across the plan period. The only large settlement without identified allocations is Rubery however as it is located adjacent to Birmingham it cannot be considered an appropriate location for rural exception housing. The settlements within the third tier of the hierarchy are smaller, more rural and have no development sites identified and are either within or surrounded by Green Belt. They therefore provide the ideal locations for rural exception housing if a proven need has been identified. It is crucial that rural exception schemes do not harm the character and appearance of attractive rural settlements within the District and therefore should be proportionate to the size of the relevant settlement. It is considered that 15 dwellings (including any market housing) is a realistic upper limit to the size of schemes in most instances.

### **Consultation Feedback**

8.98 The issue of rural exception housing was previously addressed within the affordable housing policy but has now been given greater prominence in a policy of its own so greater detail can be provided. This reflects the importance of this method as a way of delivering affordable housing and also the fact that the Council no longer intends to develop an Affordable Housing SPD following the adoption of this Plan. Consultation feedback from both the Draft Core Strategy 2 and the Draft Affordable Housing SPD (November 2009) highlight the support for a policy on this issue. In particular, respondents to the draft



SPD felt that the matter was of such importance it should be addressed within a DPD rather than an SPD so greater weight could be attached to it. Some respondents highlighted that some market housing could be acceptable as cross-subsidy to enable the delivery of rural affordable housing. Wording changes have been made to address this issue and ensure that the policy accords with the NPPF.

## **Sustainability Appraisal**

8.99 The assessment of the policy within the Sustainability Appraisal has identified that the policy performs well against some of the social objectives due to the delivery of affordable housing, the creation of mixed and balanced communities and the potential to improve the vitality and viability of some community facilities in some small settlements. The potential loss of Green Belt land means that the policy has a negative impact when assessed against EV2.

### **BDP9 Rural Exception Sites**

**BDP9.1 Exceptionally, affordable housing will be allowed in or on the edge of settlements in the Green Belt where a proven local need has been identified. In accordance with the Settlement Hierarchy (BDP2) Bromsgrove Town and the large settlements are not acceptable locations for rural exception housing.**

**BDP9.2 Every application for affordable housing under this policy must contain a Local Housing Needs Survey. This survey should be completed prior to the submission of any planning application and identify the following:**

- a. A genuine need to live within the village – A local connection will be required for this e.g. employed/live within the village or need to give or receive support from a close family member who lives in the village;**
- b. A financial need for affordable housing – The survey should identify individuals who are unlikely to be able to get a sufficient mortgage to purchase a property on the open market that meets the basic needs of their family; and**
- c. The type and tenure of affordable housing – The survey should gather information ascertaining the size of the property required and whether social rented, intermediate or affordable rent accommodation is needed**

**BDP9.3 The following sequential test will be applied to sites:**

- i. In the first instance sites should be located within existing settlement boundaries**
- ii. Where there is not possible sites should be adjacent to the village boundary**

**BDP9.4 Under no circumstances will housing be considered on sites that are detached from settlements that appear as isolated housing developments in the open countryside.**

**BDP9.5 Any proposals should be proportionate to the size of the settlement in question and therefore it is considered that schemes should not generally be larger than 15 units. Under no circumstances will schemes be permitted where the number of units exceeds the need identified in the Housing Needs Survey.**

**BDP9.6 Whilst the Council has a preference for 100% affordable housing schemes, where it can be robustly justified through a viability appraisal the inclusion of other tenures within a scheme may be acceptable. The majority of any scheme should always consist of affordable housing and viability appraisals should highlight that the amount of any market housing included is minimised so that only sufficient finance is raised to provide the required cross-subsidy without leaving a residual profit.**

#### **BDP10 Homes for the Elderly**

8.100 The UK's ageing society poses one of the nation's greatest housing challenges. Based on data from the 2011 census, older people occupy nearly a third of all homes. Nearly two-thirds (60%) of the projected increase in the number of households from 2008 to 2033 will be headed by someone aged 65 or over. Over ten million people in the UK are over 65 years old. The latest projections are for five and a half million more elderly people in twenty years' time and the number will have nearly doubled to around nineteen million by 2050. Within this total, the number of very old people grows even faster. There are currently three million people aged more than 80 years and this figure is projected to almost double by 2030 and reach eight million by 2050. While one-in-six of the UK population is currently aged 65 and over, by 2050 one in-four will be. The pensioner population is expected to rise despite the increase in the women's state pension age to 65 between 2010 and 2020 and the increase for both men and women from 65 to 68 between 2024 and 2046. In 2008 there were 3.2 people of working age for every person of pensionable age. This ratio is projected to fall to 2.8 by 2033 (Parliament, 2012).

8.101 This trend is exacerbated in the rural District of Bromsgrove as it is predicted that the population aged 60 and over will, in fact, increase substantially. The SHMA (February 2012) shows that within Bromsgrove the proportion of older person households is forecast to grow from 21.4% to around 33% of the total population by 2030. The changing age profile of the projected population of the authority indicates that there will be a high demand for smaller properties able to meet the needs of older person households.

8.102 Over the longer-term the proportionate and absolute increase in older person households will place ever increasing pressures on the existing housing stock. In particular the rise in households where the head of household is aged over 85 will lead to greater requirements for different forms of supported housing which can meet the needs of elderly residents. This increasing ageing

population may also have a significant impact on policy and planning for the District, with specific regard to community safety, health and the strength of communities. Generally older age groups tend to have a heightened fear towards crime, as well as having a greater propensity to having Limiting Long Term Illness (LLTI).

8.103 Although there is likely to be relative stability in the locally generated need and demand for housing from the younger and working age populations, there will be very large increases in the need and demand for housing with care from older people, especially from the oldest elderly whose numbers will almost double.

8.104 There is a need for a dramatic change in house building in the District towards providing many more two bed homes for all age groups (Refer to Policy BDP7 Housing Mix and Density). Failure to provide alternatives for the rapidly increasing pensioner population will result in most people staying in their existing family homes - as is currently the case - with the effect of dramatically reducing the supply of such properties in the local housing market.

8.105 Building new homes and communities designed with older people in mind not only makes sense in terms of meeting the diverse needs of an ageing population, it can also help to open up housing opportunities and choices for younger people. A housing policy for an ageing society is therefore a good housing policy for everyone.

8.106 Lifetime Homes Standards are inexpensive, simple features designed to make homes more flexible and functional for all. In order to progressively encourage increased take-up in new build projects, Lifetime Homes Standards are a key feature within the Code for Sustainable Homes and currently mandatory at level 6.

8.107 The Joseph Rowntree Foundation in association with the Habinteg Housing Association ([lifetimehomes.org.uk](http://lifetimehomes.org.uk)) conducted a national comparative study into the cost of meeting both Building Regulations and Lifetime Home standards. The additional cost of building Lifetime Homes ranged from £545 to a maximum of only £1615 per dwelling, depending on the size, layout and specification of the property.

### **Consultation Feedback**

8.108 There was considerable support for this policy during the consultation as it demonstrated that the Council recognised the need to understand and plan for an ageing population. There were some concerns about the introduction of 'Lifetime Homes' standards from developers; however, these measures are seen as essential to meet the needs of the elderly and assisting independent living at home. 'Lifetime Homes' standards were taken into account as part of the Affordable Housing Viability Study (2012). There was also a desire from developers to provide elderly accommodation outside defined settlements; however, this would contradict policy BDP 4 Green Belt.

## **Sustainability Appraisal**

8.109 The policy was assessed within the Sustainability Appraisal, which identifies the need for appropriate provision for all sectors of the community including the needs of elderly people. The policy performed highly against social objectives, although mitigation may be required when considering development outside defined settlements.

### **BDP10 Homes for the Elderly**

**BDP10.1 Bromsgrove District Council will encourage the provision of housing for the elderly and for people with special needs, where appropriate whilst avoiding an undue concentration in any location.**

**BDP10.2 The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standards, so that they can be readily adapted to meet the needs of those with disabilities and the elderly, as well as assisting independent living at home.**

**BDP10.3 The Council will, through the identification of sites and/or granting of planning consents in sustainable locations, provide for the development of residential care homes, close care, 'extra care' and assisted care housing; and in particular Continuing Care Retirement Communities which encompass an integrated range of such provision. Sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements. Where such sites are not available regard will be paid to the potential for development to be self-contained to reduce travel requirements and the availability and accessibility of public transport.**

### **BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople**

8.110 The 2007 Gypsy and Travellers Accommodation Assessment (GTAA) identified that no additional pitches are required in the Bromsgrove District in the 5 year period between 2008 and 2013. This reflects the historical low levels of demand for accommodation of this nature within the District. The more recent options consultation of the West Midlands RSS Phase 3 Revision highlighted a need of 3 pitches arising in the period up to 2017. Five additional pitches were completed at the Wythall site in 2011. Space for the additional pitches has come from converting the transit site, which has not been used as such for 19 years. The GTAA also identified that there is no need or demand for plots to be provided for travelling showpeople.

8.110 The needs of gypsies and travellers are also addressed in the County Housing Strategy and a further Gypsy and Travellers Accommodation Assessment has now been commissioned for the period beyond 2013. Whilst, in the short-term it is considered that current needs have been met this situation

could potentially change in the period up to 2030 once the new GTAA has been completed. Therefore, it will be pertinent to consider whether sites for gypsies and travellers will need to be identified as part of the proposed Green Belt Review.

8.111 Whilst there is no identified need for accommodation in the short to medium term it is essential that appropriate criteria are set out to guide any planning applications in accordance with Planning Policy for Traveller Sites. Traveller sites should be well located to ensure that occupiers have good access to local facilities whilst minimising the impact on the environment and creating an integrated co-existence between the site and the local community.

### **Consultation Feedback**

8.112 Very few comments were received in relation to this policy although those who did felt that a sequential approach was inconsistent with national policy. Respondents felt that a clear set of criteria were required to guide applicants to appropriate sites in the District. The Council agreed that the sequential approach is not appropriate and the policy was amended accordingly.

### **Sustainability Appraisal**

8.113 The policy was assessed within the Sustainability Appraisal and it performs well against social objectives due to the creation of mixed and balanced communities and also promoting sites in highly accessible locations. The policy does not perform so well against environmental objectives as any new site is likely to be on Green Belt land due to a lack of alternatives.

### **BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople**

**BDP11.1 Safeguarding existing authorised sites; Existing authorised sites for Gypsies and Travellers that are suitably located within the District will be safeguarded unless it is proven that they are no longer required to meet identified needs.**

**BDP11.2 Sustainable locations for Gypsy and Traveller accommodation; Proposed sites should be in sustainable locations that provide good access to essential local facilities e.g. health and education. Sites should accord with the sustainable development principles set out in BDP1.**

**BDP11.3 If additional sites are required land will be identified through a full Green Belt Review.**

### **BDP12 Sustainable Communities**

8.114 The NPPF states there is a social role to sustainable development, indicating a need for supporting strong, vibrant communities. This involves people having access to local services that reflect the community's needs and

support its health, social and cultural well-being. Sustainable communities are places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.

8.115 Essential local community facilities are facilities that are of direct benefit to the immediate local community that provide an essential service, development for health (including preventative social care and community support services), education, emergency safety (including the emergency services), play and leisure or culture together with libraries, village/community halls, and religious buildings. It is becoming increasingly difficult for local facilities to remain viable in rural areas, leading to the loss of such services which is detrimental to the sustainability of the location. Across Bromsgrove, community facilities like village halls, religious buildings, Post Offices and shops often serve networks of small communities and are essential for people who may face long journeys to reach alternative services. Access to community facilities and services, such as pubs and shops are considered an essential element of sustainable and inclusive communities

8.116 The District Council will work with partners to deliver key community facilities to support the Sustainable Community Strategy and to develop Bromsgrove and its local centres. The Council will also provide facilities for the local communities, based upon an analysis of needs, with particular regard to disadvantaged groups. New development will be required to contribute towards the provision of community facilities to meet the needs of new communities and mitigate impacts on existing communities. Safe, direct routes for walking and cycling and appropriate bus services will be established to serve existing and new preschool, primary, and secondary school communities.

8.117 Community facilities should be located in centres or other accessible locations to maximise community access and build a sense of local community identity. The Council supports the retention and enhancement of existing community facilities and encourages multi-purpose community facilities that can provide a range of services and facilities to the community at one accessible location. Where existing facilities can be enhanced to serve new development, the Council will work with developers and local partners to audit existing facilities and assess the requirement for additional facilities to deliver comprehensive provision of services to serve these extended communities. Community and cultural facilities are also important to the overall wellbeing of the community and these should be protected and if necessary enhanced. The Council will work with local partners, such as Parish Councils or Community Associations, to plan and manage community facilities.

### **Consultation Feedback**

8.118 There were only a few comments received in relation to this policy, and those that did respond were generally in support, especially regarding the improvement of existing facilities and resisting their loss. The small number of

concerns related to wording changes, which have been amended where appropriate. There was a suggestion that Green Infrastructure should be included as part of sustainable communities; however, this topic is covered in sufficient depth within BDP24 and the Plan should be read as a whole.

## **Sustainability Appraisal**

8.119 This policy was assessed within the Sustainability Appraisal and focuses on protecting essential local facilities and ensuring that new developments contribute to creating a better balance of facilities, services and infrastructure within settlements. There are no clear negative impacts of this policy; however, the linkages to BDP6 requiring developer contributions for the provision of facilities, infrastructure and services and other forms of environmental and social requirements may limit the viability of a scheme.

### **BDP12 Sustainable Communities**

**BDP12.1 The Council will ensure provision is made for services and facilities to meet the needs of the community. It will also seek to retain existing services and facilities that meet a local need or ensure adequate replacement is provided. New developments that individually or cumulatively add to requirements for infrastructure and services will be expected to contribute to the provision of necessary improvements in accordance with BDP6.**

**BDP12.2 To ensure that new development contributes to the provision of sustainable and inclusive communities to meet long term needs, the Council will seek to ensure community facilities are provided to meet local needs by:**

- a) Supporting the provision of new facilities for which a need is identified in locations accessible to the community served**
- b) Supporting improvements to existing facilities to enable them to adapt to changing needs**
- c) Resisting the loss of existing facilities unless it can be demonstrated that:
  - i) There is no realistic prospect of the use continuing for operational and/or viable purposes**
  - ii) The service or facility can be provided effectively in an alternative manner or on a different site**
  - iii) The site has been actively marketed for a period of not less than 12 months or made available for a similar or alternative type of service or facility that would benefit the local community**
  - iv) There are overriding environmental benefits in ceasing the use of the site.****

### **8.120 Lets Do Business**

**BDP 13 New Employment Development**

BDP 14 Designated Employment  
 BDP 15 Rural Renaissance  
 BDP 16 Sustainable Transport

8.121 This suite of policies builds on the fact that Bromsgrove is a good place to do business. Bromsgrove provides an attractive environment for staff and customers alike and it has good accessibility and connectivity. The policies aim to attract new businesses particularly in knowledge driven technologies by providing suitable sites, whilst also recognising the importance of existing businesses to the economy of the District. The importance of an efficient transport network to the economy is also acknowledged.

### **BDP13 New Employment Development**

8.122 Policy BDP3 sets out an employment target of 28ha for the District between 2011 and 2030. 3.65ha of employment land have been completed in the first 2 years of the plan period (2011-13) and a further 24.87ha are expected to come forward over the remainder of the Plan Period. These consist of existing valid planning permissions, outstanding capacity on existing designated employment sites and a new site allocated in this document (BROM2). Details are set out in table 5 below.

<b>Table 5: Employment Land Supply 1<sup>st</sup> April 2011 – 31<sup>st</sup> March 2030</b> (Excluding land allocated at Ravensbank Business Park and Longbridge)		
	<b>Square Metres (m<sup>2</sup>)</b>	<b>Hectares (ha)</b>
<b>Completions up to April 2013</b>	36,542	3.65
<b>Sites with valid planning consent (including windfalls)</b>	67,426	6.74
<b>Outstanding Local Plan sites with capacity remaining</b>	131,200	13.12
<b>Newly allocated site as part of emerging District Plan</b>	50,000	5.0
<b>Total commitments / allocations at 1<sup>st</sup> April 2013</b>	248,626	24.86
<b>Employment Target 2011-2030</b>	280,000	28
<b>Total Employment Land April 2011 - April 2030</b>	285,168	28.52

8.123 Economic growth will primarily be focused on Bromsgrove Town and Longbridge, although any new development intended to bolster the economy or employment in these two locations should have regard to urban biodiversity and the historic environment where applicable. In partnership with Birmingham City Council an Area Action Plan has been developed for the site of the former car plant at Longbridge. The aim is that Longbridge will be redeveloped into an exemplar sustainable, employment led, mixed use development for the benefit of the local community, Bromsgrove, Birmingham, the region and beyond.



8.124 The Employment Land Review (ELR) has identified that there is the greatest level of demand for industrial and office premises within Bromsgrove Town. Primarily the demand is for smaller premises, in particular office premises below 1000 m<sup>2</sup>. and industrial premises between 2000 and 5000 m<sup>2</sup>.

8.125 Focussing employment growth within Bromsgrove Town will enable more businesses to benefit from factors that make Bromsgrove a good place to do business such as the excellent motorway links which provide access to the wider West Midlands Region and Birmingham International Airport which provides international connectivity. It is also recognised that Bromsgrove provides an attractive environment for staff and customers. Whilst there is also demand for new premises, it has been identified through a survey undertaken as part of the ELR that 31% of firms have short term plans to expand their premises, further emphasising the strength of small businesses in the District. Business start-ups have a good track record of success in the District and it is hoped that this can continue throughout the plan period.

8.126 Local employment will be supported as part of the development of Strategic Sites on the edge of Bromsgrove Town. This will help to create balanced and mixed communities by enabling people to live and work locally. Sustainable economic development in other settlements will be permitted where this achieves a better balance between housing and employment, has the potential to reduce commuting and conforms with Green Belt policy set out within the NPPF.

8.127 The Waste Core Strategy for Worcestershire has identified a need for new waste management facilities in the County. Parts of Bromsgrove District fall within levels 1 and 2 of the Strategy's geographical hierarchy, therefore it is expected that some waste management facilities are likely to be required within the District. No specific employment sites are designated for waste management provision, although a flexible approach should be taken if proposals for waste management facilities come forward during this Plan period, in accordance with guidance in the Waste Core Strategy for Worcestershire.

8.128 The majority of sites within the current employment supply fall within identified employment sites as shown on the Policies Map. In conjunction with employment development on strategic sites it is considered that there is a good range of sites available to ensure the delivery of economic growth in the District. If circumstances change any additional land for employment could be identified through the proposed full Green Belt Review.

### **Consultation Feedback**

8.129 Consultation responses identified that there was support for the policy although some felt that the policy was too focussed on traditional types of employment (B class uses) when other employers such as hotels and care homes should be mentioned. The Council notes that the policy already refers broadly to economic development and therefore considers it is not overly

focussed on B class uses. On this basis no changes are proposed to policy in relation to this issue.

8.130 It was highlighted that the policy should mention the employment target as well as explicitly highlighting the sites where employment development is permitted. In response the Council has included the employment target in the supporting text. It should be noted that the Policies Map highlights main employment areas but it is considered unrealistic to highlight every possible location where some employment might be acceptable.

8.131 Some respondents felt that the role of previously developed land in the Green Belt should also be recognised. The Council notes that the NPPF supports redevelopment of brownfield land within the Green Belt where no additional harm is caused and therefore this matter is addressed within BDP4 Green Belt.

8.132 One respondent felt that the policy should include reference to the protection of biodiversity and the natural environment however the Council notes that these matters are addressed in BDP21 Natural Environment. The Plan should be considered holistically and therefore no changes are proposed in relation to this issue.

### **Sustainability Appraisal**

8.133 The policy performs well in the Sustainability Appraisal against the social and economic objectives due to the creation of jobs, the diversification of the local economy and the opportunity for people to live and work locally rather than commuting elsewhere. However, the policy may lead to some development on greenfield sites which conflicts with some of the environmental objectives

### **BDP13 New Employment Development**

**BDP13.1 The Council will seek to maintain a balanced portfolio of sites by promoting the following:**

- a. New technology opportunities at Bromsgrove Technology Park and Longbridge**
- b. Office and mixed use schemes within Bromsgrove Town Centre**
- c. A range and choice of readily available employment sites to meet the needs of the local economy**
- d. Economic development opportunities within Bromsgrove Town and Large Settlements including within the Town Expansion Sites and Other Development Sites identified as suitable for employment use in BDP5A and B**
- e. Sustainable economic development in rural areas through proportionate extensions to existing business or conversion of rural buildings taking into account the potential impact on the openness and the purposes of including the land in Green Belt.**

**Proposals that can demonstrate significant benefits to the local economy and/or community will be considered favourably**

- f. The accommodation of waste management facilities within designated employment sites in accordance with the Waste Core Strategy for Worcestershire**
- g. Appropriate skills development, training and the creation of jobs for local residents as part of the promotion of employment sites.**

### **BDP14 Designated Employment**

8.134 A key principle in Bromsgrove is the sustainable growth of job opportunities to maintain a balance with house building. Outside the town centre and Longbridge employment growth is expected to be provided primarily in existing industrial estates and business parks, often located close to motorway junctions. These include the Saxon and Harris Business Parks, Buntsford Hill/Buntsfordgate, Bromsgrove Technology Park and Wythall Green Business Park, as well as a number of smaller sites (as identified on the Policies Map).

8.135 These are expected to make a significant contribution towards creating jobs across Bromsgrove and meeting the employment targets identified in BDP3. In addition, some jobs will be provided by new economic development opportunities within the strategic sites and limited economic development in rural areas in relation to BDP13 and BDP15.

8.136 Nationally, employment sites are under increasing pressure to be developed for housing but it is important to retain existing employment sites where possible and appropriate. In Bromsgrove, employment site retention and provision is particularly necessary to enable balanced job and housing growth, provide choices and reduce the dependency of commuting to the West Midlands MUA. The majority of existing employment sites have been identified as Best and Good sites within the Bromsgrove District Employment Land Review (2012). These sites should be protected against loss and the gradual erosion through the encroachment of alternative uses. Their loss to other uses should only be allowed in exceptional circumstances, where it can be clearly demonstrated that continued/new employment is not viable or a lack of demand can be robustly proven.

8.137 The challenge for the Bromsgrove District Plan is maximising the value from existing employment sites and supporting existing and new businesses across the District.

### **Consultation Feedback**

8.138 There was a general positive consensus to this policy and support for the maintenance and promotion of existing employment provision across the District. There were some concerns regarding the latter part of the policy concerning the loss of employment sites. A number of responses felt the requirements for non-employment developments were too rigid. In light of this and in order to conform to the NPPF, an extra paragraph has been added to

provide more flexibility. Each proposal will be based on its own merits and where it can be justified that the criteria in the policy cannot realistically be applied, alternative uses of land and buildings will be considered.

## **Sustainability Appraisal**

8.139 The policy performs well within the Sustainability Appraisal against the social and economic objectives due to the creation of jobs, the diversification of the local economy and the opportunity for people to live and work locally rather than commuting elsewhere. However, although development will be on existing sites, the policy may lead to some development on greenfield sites which conflicts with some environmental objectives.

## **BDP14 Designated Employment**

**BDP14.1 The regeneration of the District will continue through maintaining and promoting existing employment provision in sustainable, accessible and appropriate locations (as identified on the Policies Map).**

**BDP14.2 Proposals for the expansion, consolidation or extension to existing commercial and industrial uses in non Green Belt will need to ensure the scale and nature of the activity is appropriate for the area in which it is located.**

**BDP14.3 Bromsgrove District Council will safeguard employment areas that:**

- a) Are well located and linked to the main road and public transport network; and**
- b) Provide, or are physically and viably capable of providing through development, good quality modern accommodation attractive to the market; and**
- c) Are capable of meeting a range of employment uses to support the local economy.**

**BDP14.4 Proposals that result in the loss of employment land for non-employment uses, such as housing, will not be considered favourably unless applicants can adequately demonstrate that:**

- i) The proposal would not have an adverse impact upon the quality and quantity of employment land within the local area; and**
- ii) There would be a net improvement in amenity (e.g. 'non conforming' uses close to residential areas); and**
- iii) The site has been actively marketed for employment uses for a minimum period of 12 months, providing full and detailed evidence or where an informed assessment has been made as to the sustainability of the site and/or premises to contribute to the employment land portfolio within the District (as part of this assessment, consideration should be given to the appropriateness for subdivision of premises); or**

- iv) The new use would result in a significant improvement to the environment, to access and highway arrangements, or sustainable travel patterns which outweighs the loss of employment land; and
- v) The site/premises are not viable for an employment use or mixed use that includes an appropriate level of employment. A development appraisal should accompany proposals to clearly demonstrate why redevelopment for employment purposes is not commercially viable.

**BDP14.5** In line with the NPPF, planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where the above criteria is justified and there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

### **BDP15 Rural Renaissance**

8.140 Bromsgrove is predominately a rural area containing a number of rural settlements. Rural areas have faced a steady decline in farming and related industries and increased diversification of the rural economy. House prices in the District's smaller settlements have climbed out of reach of young people wanting to stay, work and live in our rural villages.

8.141 These rural areas are rich in environmental and landscape quality and protecting and enhancing these characteristics is paramount to retaining the District's local character, distinctiveness and value. However, rural towns and settlements need to be able to grow or adapt to sustain themselves. Providing balanced growth opportunities to enable people to live and work in their own rural villages and the support of local services is a key recurring theme that comes through consultation with Bromsgrove's rural communities, as is the strong desire to retain the qualities of an attractive environment that define the character of the rural settlements and the District as a whole.

8.142 Bromsgrove has seen a rise in commuting out of the District to work, leading to dormitory villages and a decline in local rural facilities. It is important that planning policies promote rural communities where people can live, work and access essential local facilities. Furthermore, many of the District's villages are of historic and/or architectural value or make an important contribution to local countryside character. It is important that new development respects and reflects this local distinctiveness. Therefore, development in rural areas must meet local needs and development will only be permitted where it would not have an adverse impact on the existing character of the locality.

8.143 The District Council will enhance the vitality of rural communities by supporting appropriate development of infill sites and previously developed land (PDL) within the settlement development boundaries of villages. The design and construction of new village development must be high quality in all respects, including design, sustainability and compatibility with the distinctive

character of the locality. Development should also contribute to the local community through the provision of relevant community needs such as affordable housing, open space, local employment, and community facilities.

8.144 Outside village boundaries, the Council will favourably consider small-scale rural business, leisure and tourism schemes that are appropriate to local employment needs; minimise negative environmental impacts and harmonise with the local character and surrounding natural environment. Development outside but contiguous to village settlement boundaries may be supported where it constitutes an exception to meet identified local affordable housing needs. Villages are encouraged to plan for the specific needs of their communities by developing Neighbourhood Plans. However, within the Green Belt, inappropriate development will still need to be justified by 'very special circumstances'.

### **Consultation Feedback**

8.145 There was a positive consensus to the policy for the support of rural regeneration and the social and economic needs of rural communities. The numerous negative responses were in regard to the lack of support for commercial expansion and development in the Green Belt. The Council cannot write policy contrary to Green Belt policy and it is for an applicant to suggest any very special circumstances as part of a planning application. There was also a response suggesting a particular premises should be considered a Major Developed Site, however, the Council do not deem this a similar scale of development. Major Developed Sites in the Green Belt are not specifically referenced in the NPPF.

8.146 There was a response that greater attention should be given to the character, condition and role of farmsteads, which has been applied to the new policy. There was a concern on the definition of small scale renewable energy developments, which has been added to the glossary.

### **Sustainability Appraisal**

8.147 The policy was assessed within the Sustainability Appraisal and it indicates there are a number of positive social and economic attributes. Allowing employment development in rural areas will help to support the rural economy, especially in the field of diversification and growth of new businesses which support existing leisure and tourism. Diversification can improve accessibility to services and the well-being of the local population. The provision of affordable housing to meet local needs can allow a greater proportion of the rural population to stay and work more locally, with positive benefits for traffic generation and climate change.

8.148 However, beyond a certain point, it is likely that such environmental spin offs will be outweighed by increased commuting into rural areas, as well as traffic impacts from delivery vehicles and customers. There is likely to be some landscape, biodiversity, noise, air quality, water quality impacts from a wider spread of economic development in the open countryside. Although this policy

could encourage applications for development in the Green Belt (negative impact against EV2), special circumstances would need to be justified, as inappropriate development would not be permitted.

## **BDP15 Rural Renaissance**

**BDP15.1 The Council will support proposals that satisfy the social and economic needs of rural communities by encouraging:**

- a) Development that contributes to diverse and sustainable rural enterprises within the District**
- b) New agricultural dwellings of an appropriate scale for the use of people in agricultural activities where a genuine need exists (occupancy conditions will apply). The District Council will not remove an agricultural occupancy condition unless it is satisfied that the property is no longer required for the holding or the agricultural needs of the area**
- c) The conversion of suitably located/constructed buildings (For example timber stables and steel portal frame buildings are not suitable for conversion)**
- d) Affordable housing on rural exception sites in line with BDP9**
- e) Appropriate development of infill sites and previously developed land within existing settlements that enhance the vitality of rural communities**
- f) Limited extension(s), alteration or replacement of existing buildings where the extension(s) or alterations are not disproportionate to the size of the original building, and in the case of a replacement building the new building is not materially larger than the building it replaces (in line with BDP4)**
- g) Rural diversification schemes, as well as the provision of live-work units and the principle of home working**
- h) Re-use of historic farmsteads to promote them as assets in the landscape**
- i) Sport, recreation and/or tourism related initiatives appropriate to a countryside location. For example in relation to Avoncroft Museum on the Hanbury Road, the Council will support activities and operations where these are clearly relevant to the primary function of the site.**
- j) Proposals for new buildings in association with equine development, such as stables and field shelters where new buildings are kept to a minimum necessary and consist only of essential facilities (for example small stables) genuinely required on a parcel of land, which preserves the openness of the Green Belt. Unless exceptional circumstances are demonstrated, these developments are to be sited within close proximity to existing rural buildings**
- k) Small scale renewable energy projects and business to serve the industry**
- l) Improvement of public transport links to service centres and employment areas, as well as development that reduces the need to commute**

**BDP15.2 The Council intends to prepare Supplementary Planning Documents to provide detailed guidance on the conversion of rural**

**buildings, occupancy conditions as well as the design of agricultural buildings.**

**BDP15.3 In all cases development should be designed to be sustainable, consistent with requirements of Policy BDP12 and BDP19; should not conflict with the environmental protection and nature conservation policies of the District Plan but should seek to enhance the environment; and should provide any necessary mitigating or compensatory measures to address harmful implications. Within the Green Belt, inappropriate development which is otherwise acceptable within the terms of this policy will still need to be justified by very special circumstances.**

### **BDP16 Sustainable Transport**

8.149 Whilst the Council will seek wherever possible to reduce the need to travel/commute by careful planning and design of new development, it is recognised that transport and accessibility plays a key role in improving quality of life and prosperity of residents and is also vital for achieving economic growth. One of the key challenges of the District Plan will be to deliver an improvement in accessibility by encouraging more sustainable means of travel and maximising the efficiency of the transport network in Bromsgrove District.

8.150 Sustainable transport will be a fundamental part of new development. This is founded on the basic principles of reducing the need to travel and, where travel is necessary, increasing in the use of sustainable transport modes. From the outset the planning and design of all new developments should consider all modes of transport, in particular access to and use of walk, cycle and passenger transport and enhance them wherever possible.

8.151 The impact of the draft Bromsgrove District Plan (BDP) on the performance of the transport network is identified by the transport elements in the Infrastructure Delivery Plan (IDP). This is based on an assessment of the impact of the BDP growth on the transport network, in terms of travel demand, journey times, congestion and accessibility across all modes of transport. The IDP identifies schemes and measures for all modes of transport across the District to mitigate the impact. The schemes and measures are based on maintaining, and where appropriate, improving the efficiency and performance of the transport network and include:

- Walk and cycle infrastructure
- Passenger transport infrastructure and services
- Highway enhancements

8.152 The third Worcestershire Local Transport Plan (LTP3) was adopted by Worcestershire County Council in February 2011, covering a 15 year period from 2011 to 2026 during which time it can be reviewed and updated. The plan was developed as a compendium of inter-related documents, providing a comprehensive approach to the planning and delivery of transport infrastructure and services in Worcestershire. The plan recognises the strong role that transport plays in supporting and enabling economic activity and



growth, as well as maintaining a high quality of life for the County's residents. It is divided into three area delivery strategies, of which the North East Worcestershire Transport Strategy comprises a series of schemes for all modes of transport for Bromsgrove District.

## **Road**

8.153 The M5 runs north to south through the District and the M42 east/ west. The M5 and M42 connect to the M6 to the north of Birmingham and the M40 providing access eastwards and to London. The local road network comprises the A38, A491, A448, the A456 and A435 as well as numerous B and C Roads.

8.154 Bromsgrove is largely a rural District and the private car remains the dominant travel mode. However, the continuing and increasing use of the private car is harmful to the environment in terms of the impact on air quality, noise and carbon emissions. Delays and congestion on the highway network, especially at peak times on key links and junctions, result in increased costs to residents, businesses, the economy and environment, whilst impacting upon the performance of all modes of transport.

8.155 In order to make it easier for car owners to make greener choices on the road the Council will encourage greater use of electric and plug-in hybrid vehicles by supporting electric vehicle charging points in new developments. Although still contributing to congestion, low emission vehicles do not have the air quality impacts of cars fuelled by conventional means.

8.156 The District has four Air Quality Management Areas at Kidderminster Road, Hagley; Lickey End, M42 Junction 1; Redditch Road, Stoke Heath; and Worcester Road, near Bromsgrove Town Centre. Further growth is likely to exacerbate these problems unless it is sustainably delivered, for example in conjunction with investment in public transport, pedestrian, cycle and highways infrastructure. Furthermore, in order to reduce congestion and improve air quality in the Town Centre, wherever possible, through-traffic will be routed via alternative less congested routes. In terms of noise pollution new development will be located at an appropriate distance from identified sources to maintain noise within acceptable levels, for example, adjacent to the motorways (cross reference policy BDP 19 High Quality Design).

8.157 In addition to encourage a modal shift away from the car to move towards more environmental and sustainable travel, public transport needs to provide a convenient and efficient alternative to the private car that will encourage more people to use it.

## **Bus**

8.158 There are currently a number of bus services operating within the District which mainly serve the urban areas as well as providing links to neighbouring settlements such as Birmingham, Kidderminster, Redditch and Worcester providing access to employment opportunities and key services. Many rural

areas are poorly served with unreliable and infrequent bus services which have limited hours of operation, however such services provide essential access for residents to key services and facilities, including the rail network.

8.159 Punctuality and reliability is an issue for bus services operating within the District which is predominantly caused by infrastructure constraints on the highway network. These issues negatively impact passenger confidence and bus usage which leads to increasing operating and passenger costs and thus viability. Reliable and frequent bus services can provide a realistic alternative to the car and can improve the performance of the transport network.

8.160 In accordance with the LTP3 Integrated Passenger Transport Strategy, the Council continues to work with the County Council to improve facilities for bus services in Bromsgrove Town Centre and across the District. Significant improvements in passenger transport will be required to provide an integrated and regular bus service. A 'clover leaf' Silver Standard bus route is included in the draft Infrastructure Delivery Plan and this route will connect Bromsgrove's Town Expansion Sites and existing residential areas to Bromsgrove railway station, with the Town Centre as the focal hub.

## **Rail**

8.161 Encouraging greater use of rail travel is an effective way of reducing car journeys. The availability of car parking and cycling facilities at railway stations is important to encourage more people to switch from car to rail for at least part of their journey. Cyclepaths, footpaths, and bus connections to stations can make an effective contribution to enabling people to move through and around the District without the need for a car.

8.162 Where a need is demonstrated Bromsgrove District Council will continue to work with Worcestershire County Council and rail industry partners to improve facilities at railway stations across the District. This includes proposals to provide a new railway station and interchange facilities in Bromsgrove by relocating and improving the existing station. Sustainable transport measures (buses, walking and cycling) to connect Bromsgrove Railway Station with the Town Centre and wider residential areas will make rail travel more viable.

8.163 The District Council welcomes plans by the rail authorities to increase the frequency of train services between Birmingham, Barnt Green, Alvechurch and Redditch which incorporates partial double tracking in the Alvechurch area and a second platform. In addition, the Cross City services to Bromsgrove will be extended by 2016, the electrification of the line will result in an increased frequency of services at the new Bromsgrove Station.

## **Walking/cycling**

8.164 Encouraging walking and cycling is the most effective way to reduce short distance car journeys. Aside from the well-publicised health and environmental benefits of walking and cycling, these modes also offer an extensive, adaptable and permeable network of routes available for use. This

network is not limited to footways alongside roads and cycle paths; it includes for example the extensive Public Rights of Way network covering urban and rural areas, the National Cycle Network (NCN) and canal towpaths where publically accessible. There are also many other benefits including as aforementioned, improving health and well-being, reducing car use/carbon emissions, as well as providing opportunities for recreation and tourism.

8.165 The location of new developments is a major determinant of the generated travel demand and associated impacts on the transport network. The location and design of development influences whether future residents and visitors will choose to walk or cycle. Other influencing factors include connections and integration of new development with the existing walking and cycling networks and improvements to the public realm that are in keeping with both existing and future environments. It would be expected that new developments promote walking and cycling by site master planning and integrate sites with the existing walking and cycling network.

8.166 It will be important that any new development recognises the walking and cycling network in the District and takes the opportunity to enhance it wherever possible, for example, the Royal Hunters Circular Walk in Bromsgrove has benefitted from funding for enhancement works. Other opportunities to enhance the existing network include the Monarch's Way, a historic long distance footpath and also Sustrans National Cycle route Number 5 (commuter and leisure route). These are located close to the proposed development sites and present opportunities for enhancement and connections into the existing and proposed walk, cycle and green infrastructure network. In accordance with the Countryside and Rights of Way Act 2000 Worcestershire County Council have prepared and published a Rights of Way Improvement Plan (ROWIP) which outlines how Rights of Way will be managed across the County.

## **Freight**

8.167 Transport user needs (including freight) will continue to be met by a combination of road, rail, bus, community transport and taxi services (or similar initiatives) or any appropriate combination of these modes. The LTP3 Worcestershire Multimodal Freight Policy has been developed to provide a comprehensive policy base to enable the delivery of schemes to enhance the efficient movement and operation of freight by all modes around the County.

8.168 In Worcestershire, the majority of freight is currently transported by road. There are numerous reasons why this is the case, in particular, freight transported by road is relatively cheap, and has the highest penetration of all areas in the County, as a result of the road network being far more extensive and developed than rail and water networks. Significant technological advances in recent times have led to Heavy Goods Vehicles (HGVs) becoming increasingly fuel (resource) efficient, quieter and less damaging to highway infrastructure. However, the availability and rising costs of fuel resources, together with the environmental impacts of road transport in general are causing freight operators to consider other, more sustainable energy sources

and transport modes for moving freight, including for bulk goods and waste, such as by rail or water. The aim must be to improve safety, reduce congestion, reduce emissions and make for efficiency savings for businesses. The lack of proper facilities for deliveries and for goods vehicles may be a consideration for businesses when selecting suitable locations.

8.169 The District's Inland Waterway network including the Worcester and Birmingham Canal may offer short haul high volume and long term opportunities for the sustainable movement of freight through the District. Any freight carriage must be compatible with the canals' roles for leisure, sport and recreation use and as ecosystems. Moreover, proposed improvements at Bromsgrove Railway Station may potentially offer improvements leading to greater efficiency in the movement of freight through the District.

## **Air**

8.170 Birmingham Airport is the region's principal airport and is important in terms of the air links it provides and the role it can play to; connect Bromsgrove internationally, serve local businesses, enhance leisure and training opportunities and increase access to emergency services. Established and high quality connections with the airport by passenger transport and highway network can provide benefits to the residents and businesses of Bromsgrove District and the wider economy of Worcestershire and the West Midlands region.

## **Travel Plans**

8.171 A travel plan is a long term package of measures produced by developers, employers or institutions to encourage those that attend the organisation or site to make use of alternatives to single-occupancy car use. Such a plan for example, could include: car sharing schemes; a commitment to improve cycling facilities; a dedicated bus service or restricted car parking allocations. It might also promote flexible-working practices that limit car use, such as remote access and video conferencing.

8.172 Travel plans offer real benefits not only to an organisation and its employees, but also to the community that surrounds it. Travel Plans may help to relieve local parking or congestion problems or improve public transport connections across the area. They may also relieve stress on employees through reducing travel delays or providing the opportunity to cut their travel commitments by working from home where appropriate.

8.173 Requirements for when travel plans should be submitted are as follows<sup>21</sup>:

- 1) All major developments comprising housing, jobs, shopping, leisure and services;
- 2) Smaller developments comprising housing, jobs, shopping, leisure and services which would generate significant amounts of travel in, or near to, air

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<sup>21</sup> Paragraph 36 of the NPPF states that all developments which generate significant amounts of movement should be required to provide a Travel Plan.

quality management areas, and in other locations where there are local initiatives or targets set out in the development plan or local transport plan for the reduction of road traffic, or the promotion of public transport, walking and cycling. This particularly applies to offices, industry, health and education uses;

3) New and expanded school facilities should be accompanied by a school travel plan which promotes safe cycle and walking routes, restricts parking and car access at and around schools, and includes on-site changing and cycle storage facilities; and

4) Where a travel plan would help address a particular local traffic problem associated with a planning application, which might otherwise have to be refused on local traffic grounds.

### **Transport Statement and Assessments**

8.174 When proposed development will generate significant amounts of movement the transport implications should be properly considered. A Transport Statement or Transport Assessment will help to identify suitable measures to achieve a more sustainable outcome. Transport Statements and Assessments should be fully informed by Guidance on Transport Assessment (DfT, March 2007) and Worcestershire LTP3 Requirements for Transport Assessments and Statements (March 2011).

### **Consultation Feedback**

8.175 There was widespread support for the policy although concerns were raised over the deliverability of the policy with the District Council being reliant on other bodies such as the County Council who have been making cuts to bus services. Discussions are ongoing with the County Council regarding public transport services and where necessary financial contributions will be sought from developers improvements.

8.176 Some felt that the policy could be expanded to mention proposed changes to the rail network including the new Bromsgrove Station, improvements to the cross-city line and better links between the train station and Bromsgrove Town Centre. It was considered that the existing reference to relocate the new Bromsgrove Station was appropriate and additional improvements to the network have been included. Other respondents were keen for a reference to be included that supported new and expanded rail station car parks. It is not considered appropriate to actively encourage new or extended rail station car parks as Worcestershire County Council will work with Network Rail and Train Operating Companies to identify optimum levels of car parking at rail stations, supported with Station Travel Plans (as identified in the LTP3 Smarter Choices Policy) to encourage greater use of sustainable modes of travel to access rail services." The Local Transport Plan 3 (LTP3) states that "The County Council recognises that, whilst rail is a sustainable means of travel, the provision of parking at stations is not sustainable, as this encourages rail users to drive to access rail services (particularly for short trips)."

### **Sustainability Appraisal**

8.177 This policy has overall positive benefits for all objectives. The emphasis on sustainable transport will have a positive impact environmentally and may in turn improve the health of the population in Bromsgrove District.

## **BDP16 Sustainable Transport**

**BDP16.1 Development should comply with the Worcestershire Local Transport Plan 3 policies, design guide and car parking standards<sup>22</sup>, incorporate safe and convenient access and be well related to the wider transport network.**

**BDP16.2 Contributions from developers will be sought for new development in respect of investment in public transport, pedestrian, cycle and highways infrastructure as detailed by the draft Bromsgrove Infrastructure Delivery Plan in conjunction with policy BDP6 Infrastructure Contributions.**

**BDP16.3 The Council will support the use of low emission vehicles including electric cars through encouraging the provision of charging points in new developments.**

**BDP16.4 The Council will continue to work with key stakeholders to support significant improvements in, and increase usage of, passenger transport, for example, ensuring an integrated and regular bus service is provided which will connect residential areas to the railway station, with the Town Centre acting as the focal hub and supporting the enhancement of railway infrastructure and the relocation and improvement of facilities at Bromsgrove Railway Station.**

**BDP16.5 The improvement of car parking and cycling provision at stations will be supported where appropriate and in accordance with other policies contained within this Plan.**

**BDP16.6 Infrastructure for pedestrians and cyclists, for example access routes and cycle parking, will be provided in a safe and sustainable environment within the context of green infrastructure, as an integral feature of proposed development. Developments which would worsen walking and cycling access and exacerbate motor vehicle dependence should not be permitted.**

**BDP16.7 Retail and employment development should make proper provision for freight delivery and collections and should consider using sustainable methods of freight transport.**

**BDP16.8 The Council will encourage the use of travel plans where applicable to secure the provision of sustainable travel choices, both to new developments and to extensions of existing sites, regardless of use.**

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<sup>22</sup> Worcestershire LTP3 Highways Design Guide Appendix A Worcestershire County Council Parking Standards (March 2011).

**BDP16.9 Developments which generate significant travel demands must include a transport statement or transport assessment, being fully informed by guidance, and have easy access to existing or proposed public transport links.**

### **8.178 The One and Only Bromsgrove**

BDP 17 Town Centre Regeneration  
BDP 18 Local Centres  
BDP 19 High Quality Design  
BDP 20 Managing the Historic Environment  
BDP 21 Natural Environment

This section recognises the importance of the unique qualities of Bromsgrove whether it be the Town Centre, the local centres, its natural environment or its heritage assets. These policies seek to ensure that through high quality design these qualities are perpetuated and enhanced wherever possible.

### **BDP17 Town Centre Regeneration**

8.179 Bromsgrove Town Centre is a historic market town laid out before 1275 and a place called Bromsgrove was mentioned in the Domesday Book. Its early economy is likely to have been focussed on the wool trade together with other clothing towns in Worcestershire. The High Street follows the route of a Roman Road and still contains a number of historic buildings of which some are listed and/or protected by Conservation Areas Status. There is however some evidence of unsympathetic infilling, inappropriate replacement shopfronts and signage within the Town Centre. Furthermore whilst partial pedestrianisation of the High Street occurred over twenty years ago, the pedestrianised area is now considered to be unattractive, with cluttered street furniture and a poorly maintained paved surface.

8.180 The Town Centre lies at the heart of the District and although it remains the main retail destination within the District, not all local residents use Bromsgrove Town Centre as their primary shopping destination. This is partly due to the role and function of the Town Centre and partly due to geography. Bromsgrove District is over 20,000 hectares in size and some of its settlements are comparatively remote to the Town Centre, with other centres outside of the District, such as Birmingham, Redditch and Stourbridge, lying closer to these outlying settlements. The function of Bromsgrove Town centre is traditionally seen as catering for the local needs of the District's residents. This is reflected in the mixture and proportion of uses present such as limited comparison floorspace, convenience shopping (including a regular market), local services, housing, employment (predominantly retail and service sector but with some light industry), health care facilities, sports centres/leisure facilities and restaurants.

### **Bromsgrove Town Centre Retail Capacity Assessment**

8.181 A Retail Capacity Assessment was completed in 2004 which was updated in 2007, and again in 2010. The most recent assessment took into

consideration new retail stores that had received Planning Consent, including Sainsbury's and Aldi. Key assumptions and data sources underpinning the 2007 update have been revisited in light of the current economic climate.

8.182 The Retail Capacity Assessment report reviewed the tested assumptions from 2007, and then provided a forecast of comparison and convenience floor-space capacity in Bromsgrove over 5 year periods (2010, 2015, 2020 and 2025). Recommendations on the level of retail expansion that could be supported and the type and format of floorspace that can be accommodated have been provided. The Report concluded that over the period there is likely to be no further need for convenience retailing floorspace, and a likely need for up to 16,560sqm of comparison retail floor space up to 2026.

#### Retail

8.183 The Council is committed to enhancing the retail offer in the District by creating a Town Centre where retailers want to locate, and where people from both within the District and beyond will choose to shop because of the high quality environment, and the wide range of shopping opportunities. The retail accommodation in the Town Centre is mixed, and many small and independent businesses occupy small premises that do not lend themselves to redevelopment. These types of business are very important to Bromsgrove and it is essential that they continue to offer shopping choices which many of the larger retailers do not. However, as a result, there is a shortage of suitable larger retail accommodation that suits modern retailing needs. To complement these smaller independent businesses it is important to be able to offer a wide range of other opportunities for retailers and shoppers. It has been identified that the lack of suitable larger premises is currently restricting the retail offer in the Town Centre, many of the nationally established high street retailers would like to locate to Bromsgrove but are unable to find accommodation of the appropriate scale to meet their needs.

8.184 New retail accommodation will therefore be provided to expand the retail offer of the Town Centre. The strategy involves concentrating commercial and retail development around the High Street and the other areas of the Primary Shopping Zone. Due to the physical space constraints of this area new additional retail accommodation will be provided as part of potential mixed use schemes in key locations.

8.185 This approach will improve the quality and range of Town Centre shopping and help to define and distinguish Bromsgrove as a centre which contains the High Street retailers many people expect, but will also ensure that smaller boutique style independent retailers are safeguarded along with the historic shop premises which many of them occupy.

8.186 The policies in BDP17 are not designed to be overly restrictive, it is understood that retailing can be done in premises of all shapes and sizes and it is important to create an environment where innovation in all sectors including retail is allowed to flourish. Over time there may be other opportunities in the Town Centre that could provide much needed further retail space such as the sites to the rear of the High Street properties.



## Markets

8.187 The ability of street markets to play a positive role in the Town Centre should not be overlooked; the current markets that take place will be continued with other opportunities explored for specialist markets and market traders to operate in the Town Centre. The successful functioning of street markets will be considered as part of the public realm enhancement and the proposals will include, where possible, features which will help the markets to operate in an efficient and flexible manner. Simple ideas such as the positioning of services, street furniture and street trees can all help in ensuring markets continue to play an important role in the function of the Town Centre.

## Housing

8.188 Town Centre residential development can be accommodated in a number of different ways; in the conversion of vacant spaces above shops on the High Street and surrounding areas, within mixed use development schemes and on Recreation Road in a dedicated retirement living complex. Any new residential development in the Town Centre will provide a welcome addition to the overall housing offer and as such should reflect the needs of the District. New housing should focus on the provision of smaller affordable units, and housing suitable for the elderly, although more aspirational housing will also be welcomed in appropriate schemes and locations.

## Employment

8.189 The Town Centre is currently home to a variety of employers. In addition to those employed in the retail sector, significant numbers of people work in office based jobs as well as some light industrial businesses. It is important that this wide mix of employment opportunities is maintained and expanded to allow for a Town Centre that can be successful in all market conditions.

8.190 An important part of this will be the significant improvement in the provision of office accommodation within the Town Centre. The expected expansion and increase in the population of the District as identified in BDP3 will bring with it a requirement for new employment opportunities. Whilst some of this will be provided for on existing employment sites and new development on the expansion sites, it is important that the Town Centre also offers new opportunities. Office based development within the Town is seen as important, particularly with the increased catchment area for business and employees offered by the planned electrification of the cross city railway line and the provision of a new train station. These improvements will make Bromsgrove even more readily accessible from Birmingham. In order to capitalise on this it is important to offer a pleasant and affordable choice for businesses and commuters choosing to relocate out of very costly city centre accommodation.

## Open Space

8.191 The Town Centre contains few open spaces. Existing spaces include the Recreation Ground, and land surrounding Spadesbourne Brook and St John's Church. At present the Recreation Ground provides only limited value to the local population, and has few amenity functions. It is important to improve the quality of natural and historical assets that already exist, and to maximise the

potential that new development opportunities provide in the provision and enhancement of open space in the Town Centre.

#### Evening economy

8.192 Town Centres are generally considered as the principal locations for entertainment and cultural activity. In Bromsgrove, evening activity is largely limited to some public houses and restaurants. Improving the opportunities to eat and drink is important to residents and visitors to the Town Centre, although a balance is required between traditional pub and restaurant culture and other social activities. In order to accommodate other much needed social facilities, the provision of meeting places for members of the community such as the young or old, who cannot or do not want to use more traditional meeting places like pubs and restaurants will be supported by the Council as potential uses on key development sites.

8.193 Other evening activities will be developed such as twilight shopping or similar events and activities. A cinema is proposed as part of a mixed use development on the historic market site. Improvements to pavements and lighting along School Drive, as well as improved signage and lighting of the Artrix itself, will help connect it more successfully with the centre of Town. Evening parking charges will be reviewed and additional taxi and bus services instigated to improve the accessibility of the Town Centre in the evening.

8.194 There is the perception that there is a preponderance of vacant units, lower end retail uses and hot food takeaways and that generally the Town Centre is “rundown”. Bromsgrove Town Centre has relatively few evening economy uses, with those that do exist being generally clustered at the western end of the High Street and on Worcester Road. This area of the Town Centre, being the liveliest at night time, inevitably suffers some disturbance and has the potential to give rise to fear of crime by some resident groups. It is therefore important to encourage public safety in the Town Centre by providing natural surveillance of areas, particularly in new developments, mixed uses and encouraging good lines of sight across open spaces.

#### Transport and Movement

8.195 Whilst strategically placed with good accessibility to the UK motorway network road congestion is an increasing problem for the Town Centre, particularly during peak hours and when traffic attempting to avoid motorway congestion diverts to the local road network. Bromsgrove’s railway station is located approximately one mile from the Town Centre, with poor pedestrian, cycle and bus linkages between the Town Centre and the station. Whilst bus services are able to penetrate the Town Centre, problems with disabled access and general pedestrian accessibility remain. At present the overall quantity of car parking is considered adequate for the Town Centre. Significant improvements are however required in public transport, in particular to provide an integrated and regular bus service which will connect new and existing residential areas to the railway station, with the Town Centre acting as the focal hub.

#### Public Realm

8.196 The Public Realm improvements on the High Street have been approved and are vital to enhance the heritage of the area and recreate an attractive Town Centre with a more positive sense of place. It will signal that change in Bromsgrove is permanent, with a statement of intent that sets a benchmark for the standard expected of further regeneration and development initiatives that follow across the Town. A safe and attractive public realm will attract visitors and shoppers and lengthen their stay, increase the number of people living in Town, and help attract businesses from all sectors by tangibly demonstrating public investment in the Town. The dated streetscape has suffered from ad hoc repair and is cluttered by excessive street furniture, which detracts from the heritage and character of the Bromsgrove Town Conservation Area and makes many spaces unusable for markets and other activities which the Council would like to see take place in the Town.

8.197 The revitalised public realm will form part of a Town Centre that is an accessible asset for the whole community. The focus of the public realm strategy is the creation of a safer environment, using design techniques such as the creation of active spaces; appropriate landscaping; lighting; signage; alongside other measures such as improved CCTV; and community patrols. A new management strategy for the Town Centre will ensure an ongoing commitment to suitable maintenance and repair regimes for the new infrastructure.

#### Urban Design and Conservation

8.198 The successful regeneration of Bromsgrove Town Centre will require the design of new development to be of the highest quality whilst respecting the historic environment within which it sits.

8.199 The Bromsgrove Town Centre Conservation Area contains an assortment of notable historic buildings dating from predominately the 18th and 19th centuries but with some earlier surviving timber framed buildings. A range of architectural styles is represented from English vernacular, to restrained Georgian and more elaborate Victorian Gothic buildings. The variety of elevational treatments and styles demonstrate high quality construction and craftsmanship, giving a rich texture to the Town Centre, and are tangible reminders of the Town's past prosperity. Our Conservation Area strategy recognises that the special interest of a Conservation Area is defined by more than its appearance and includes the atmosphere, texture, sense of place and setting, as well as more obvious qualities such as groups of historic buildings.

8.200 The narrowness of the historic building plots, varied rooflines and the overall height of the buildings give an overall impression of vertical emphasis, and a strong sense of enclosure. The more modern developments unfortunately detract from this, being generally set back from the established building line, sometimes a storey lower and include detailing which gives a horizontal rather than vertical emphasis. These infill sites do at least give opportunities for redevelopment in the future without sacrificing any surviving important historic buildings, for example, the 1970s retail development around Mill Lane, the block on the East side of the High Street at the junction with Stratford Road, and 80-102 High Street which are all of limited architectural quality. The

redevelopment of the Market Hall site, although outside the Conservation Area, will set the tone for high quality contemporary design which complements the wider historic context of Bromsgrove. Further details about the Town Centre Conservation Area can be found in the Conservation Area Appraisal which is part of the evidence base to support this plan.

#### Townscape Heritage Initiative

8.200 Most of the modern shopfronts in the town centre bear little relationship to the historic buildings above and a lack of consistency in style, proportions of signage, materials and colour schemes is evident. Repairs and improvements to shop fronts within the High Street will be encouraged, as will the installation of historically sensitive shop fronts within buildings deemed to have heritage value to Bromsgrove.

8.201 Bromsgrove District Council, in partnership with Worcestershire County Council, is seeking to regenerate the historic Town Centre of Bromsgrove through a Townscape Heritage Initiative (THI) - a partnership project between Bromsgrove District Council, Worcestershire County Council and the Heritage Lottery Fund (HLF). The £1.6 million heritage-led regeneration scheme between 2012 and 2017 will help to achieve the long-term economic sustainability of Bromsgrove by preserving, restoring and enhancing the historical, architectural and cultural heritage of the town. The THI area extends from Worcester Road to the Strand and follows the medieval plan comprising the main south-west/north-east route between Worcester and Birmingham. The Bromsgrove THI initiative will be integral to regenerating the town centre and will recreate a vibrant and sustainable environment which will attract visitors and businesses alike.

#### Natural Environment

8.202 The Spadesbourne Brook flowing through the town is an important natural asset. Parts of the Brook are naturalised, including areas between Birmingham Road and School Drive, and at the bus station. However, the majority of the Brook has been re-routed, culverted and effectively relegated to function as a storm drain through the Town Centre, hidden from view, and sometimes covered entirely by access roads to properties. Even in its urban context the brook contains some plant and animal life, and the water quality is good and clear. However it fails to provide any real amenity value for users of the Town Centre and its ability to support a wider variety of plants and animals is reduced by its unnatural form.

8.203 The naturalisation of Spadesbourne Brook is an important component in regenerating the Town Centre. The relocation and naturalisation of specific parts of the brook will allow for greater use by the community. It will be important to maintain trading accesses for local businesses. Such development will ensure that shoppers in the High Street are never more than a few minutes away from an attractive area of green and open space and it will improve permeability and legibility within the Town Centre. It will include relocation and naturalisation of the watercourse where possible, a raised water level, improved flood capacity, a habitat appropriate for many plants and animals including water voles, high quality paving, seating areas, new trees and planting.

## **Bromsgrove Town Centre Delivery Sites**

8.204 Ten development sites have been identified within Bromsgrove Town Centre to provide a stimulus for regeneration. Some are currently coming forward for developments and other sites currently being marketed present a medium to long term opportunity for the plan period 2011-2030.

### **Historic Market Site**

8.205 Proposals for a mixed use development are currently expected. The development proposals are expected to include shops, restaurants and a 5 screen cinema.

### **Recreation Road**

8.206 The site will be developed as a high density residential scheme suitable as retirement living. This is intended to be independent 'Extra-Care' style units (C3) to provide a retirement living complex which could share a number of onsite facilities, such as a shops, hairdressers and communal facilities such as a restaurant and lounges and a garden. More specific nursing care (C2) could be included within the scheme as well as a small amount of general needs housing.

### **Recreation Ground**

8.207 The Council wishes to revitalise the Recreation Ground to provide a space which is a real asset to the communities who live and work in the Town Centre, and to also offer an additional attraction to visitors.

### **Parkside Middle School**

8.208 Current proposals to refurbish and extend the former Parkside Middle School premises to create office accommodation for Worcestershire County Council and a Civic Centre for Bromsgrove District Centre and associated staff. The scheme will also incorporate the relocation of Bromsgrove Registration Services, Bromsgrove Hub and Bromsgrove Library.

### **School Drive**

8.209 The Council believes the current Dolphin Centre site offers the most scope for a new leisure centre although with a reconfigured layout including revised car parking arrangements. Other uses such as residential or ancillary retail units may also be acceptable.

### **Windsor Street**

8.210 The Town Centre currently suffers from a lack of larger retail units which some High Street retailers' desire. It is felt that the site on Windsor Street can offer these types of units, complementing the offer from retailers on the High Street rather than competing with them. Windsor Street has been identified primarily as a retail led mixed-use opportunity. The site can be developed to provide 3 or 4 larger retail units of around 1,000 square meters, although office development may be considered, including public sector offices particularly on upper floors. The Congregational Chapel within the site is a Grade II Listed Building and development should be sympathetic to this asset.

### **Birmingham Road Retail Park**

8.211 The site has planning permission (09/0365) for a single Sainsbury's supermarket of approximately 45,000 square feet which will employ around 400 people. The development will reinstate the street frontage along Birmingham Road; this requires the relocation of a petrol filling station and the retention of the existing listed buildings. This will enable the site to become part of an extended primary shopping zone, aided by improved pedestrian and landscaping links to the Town Centre.

### **Birmingham Road/ Stourbridge Road Junction**

8.212 This site will be considered for a variety of different uses, however the favoured approach would be a development which incorporates new office accommodation.

8.213 The site would be required to reinstate street frontages along Birmingham Road with high quality distinctive architecture at the strategically important Parkside Crossroads and tree planting will be required along Stourbridge Road and specifically on Birmingham Road to continue the reinstatement of the historic lime avenue.

8.214 The development will be expected to contribute to improved accessibility measures to link the site more effectively with other areas of the Town Centre. This may take the form of improved pedestrian crossing facilities and resurfacing of pavements in the vicinity. Measures to improve public transport, servicing of the site and the movement of traffic, generated by the development through the congested crossroads will also be required.

### **Mill Lane**

8.215 This site functions as part of the Primary Shopping Zone and as such any redevelopment will be required to maintain retail uses on the ground floor, upper floors could be used for both residential and or office accommodation. The route between Market Street and Bus Station into the High Street along Mill Lane is considered one of the key Town Centre gateway areas and as such development in this area should reflect this in the design of the public realm and the buildings that surround it.

### **Worcester Road Employment Area**

8.216 The Council wishes to maintain a substantial element of employment opportunities in and around the Town Centre and as such the focus for any redevelopment of this site should be employment led. It is also acknowledged that flexibility needs to be introduced to enable businesses to operate in challenging economic circumstances such as those we currently face. Adjacent properties to the north, which are currently part of the existing Town Centre zone, may also offer wider opportunities for redevelopment, along with any proposals for the site identified above.

8.217 In conclusion the Town Centre whilst performing the role and function of serving the needs of Bromsgrove's residents, has the potential for

enhancement and sustainable mixed use regeneration to enable it to better perform this function for the greater benefit and inclusion of local residents.

### **Consultation Feedback**

8.218 There was widespread support for the regeneration of the Town Centre with very few changes actually sought to the policy.

8.219 Overall support for the naturalisation of the Spadesbourne Brook was noted with some respondents concerned it would impact the trading access to businesses in the Town Centre. The policy seeks to encourage the naturalisation of specific parts of the Spadesbourne Brook especially in areas that will allow for greater use by local residents whilst not to the detriment of local businesses.

8.220 Some respondents felt the policy should provide greater detail on the evening economy with others suggesting that a specific housing target for the Town Centre would be beneficial. A number of references are made to the evening economy and it is considered this policy provides adequate support to allowing such development to take place within the Town Centre. In addition an Evening Economy Group was established so that local businesses and interested parties could directly influence the economic potential of Bromsgrove Town Centre in the evening.

8.221 In terms of housing numbers it is difficult at this stage to anticipate numbers that could be achieved, partly due to the mixed use opportunities at certain sites and the uncertainties linked to viability and it is considered that any Town Centre housing would provide a windfall gain. The rationale for not incorporating a specific number of residential units in the Town Centre is that it is very difficult to estimate what capacity each site could contain. At this stage specific targets are almost impossible to determine, however, once developers seek to progress with the sites, only then will a realistic target be known and worth referencing.

8.222 Some respondents wanted to encourage independent retailers whilst others recognised the potential to attract a large retailer to the Town Centre. The revised policy recognises the importance of small and independent businesses to Bromsgrove and they have a role to play in Bromsgrove in offering alternative shopping choices to the large retailers. In addition the policy seeks a balanced approach in terms of providing the physical space for nationally established retailers whilst also safeguarding the smaller boutique style independent retailers. It is important for Bromsgrove Town Centre to adapt to the modern requirements of retail so that it is a positive environment for retailers.

8.223 Several respondents referred to specific development sites with some seeking improvements to the existing sports hall and support for the Sainsbury's development. In terms of specific sites the revised policy incorporates the 10 development sites within the Town Centre to emphasize the Councils support of Town Centre regeneration. This includes School Drive site which encourages a new leisure centre and the proposal for a Sainsbury's

supermarket on the Birmingham Road Retail Park which received planning permission on 28 June 2010.

8.224 Some public support for the Drill Hall as a historic, architectural and local asset (by local residents) was raised. It was also noted that there is some public support to regenerate the whole site and create a modern building. There is also no reason why in regenerating the Drill Hall that some reference is given to the historical background to the site. A number of factors need to be considered when regenerating a site. Local support for keeping certain buildings in Bromsgrove is noted and the Council can seek to encourage the retention of them, but there are other factors that would be considered when regenerating the identified sites. These include whether the buildings are on the local list, whether the building is statutory listed, the level of quality design or architectural quality of a proposed building, and also the level of economic activity that the regeneration of a site could together with viability issues to enable development to proceed. When considering these factors regeneration of a site could be very difficult to refuse.

### **Sustainability Appraisal**

8.225 This policy performs well overall as the regeneration of the town centre is likely to have far reaching social, economic and environmental benefits for the District.

### **BDP17 Town Centre Regeneration**

**BDP17.1 The Town Centre, as shown on the Policies Map, represents an area where significant change and conservation is needed along with a planning framework to guide and promote future development. All new development is required to be appropriate, in terms of scale, quantity and use, to the character and function of the Town Centre.**

### **BDP17.2 Bromsgrove Town Retail Capacity** **BDP17.2.1**

**BDP17.2.2 Bromsgrove Town Centre will continue to be the main retail centre of the District with extended Primary and Secondary Shopping Zones being the focus. As such:**

- a) A1 Uses will remain the predominant use for ground floor premises in the Primary Shopping Zone in order to maintain the retail vitality and viability of the Primary Shopping Zone and wider Town Centre.**
- b) Other A class uses will be supported throughout the Secondary Shopping Zone. Development outside A Class Uses in Secondary Shopping Zones and will be considered where there is no adverse impact to the retail viability of the Town Centre.**
- c) Retail development will be generally resisted in other areas of the designated Town Centre unless it can be demonstrated that proposals will not have an adverse impact on the viability and vitality of the primary or secondary shopping zones.**

**The Council will:**



- d) Continue to support markets in the Town Centre and provide for specific facilities within the public realm to ensure that a range of different markets can contribute to the overall vitality of the Town Centre.
- e) Support proposals to deliver high quality housing which provides a mix of unit sizes and tenure, contributing to the districts overall affordable housing provision. This includes retirement living accommodation on Recreation Road; development of vacant premises above shops on and surrounding the High Street; residential development within mixed use schemes.
- f) Continue to support small specialist shops, whilst creating opportunities for new retailers to enter the Town; and seek to offer new opportunities for people to work in the Town by providing an enhanced Town Centre which provides flexible business spaces available to accommodate a wide range of employment uses, as well as dedicated B1 office developments. Existing employment sites will be the focus of new employment developments.
- g) Protect and enhance all existing public open spaces within the Town Centre with specific proposals for enhancements on The High Street, The Spadesboune Brook and The Recreation Ground.
- h) Seek to improve the range of the evening economy uses within the Town Centre, to include a mix of entertainment uses for all groups, including sport, leisure and culture, a choice of bars, cafes and restaurants. New opportunities for community events will be explored including community focused leisure and cultural development and potential for a new Civic Centre whether stand alone or part of a mixed use scheme.

#### **BDP17.3 Movement**

- a) Sustainable travel will be promoted by improving pedestrian priority, linkages and mobility within and across the Town Centre; improving pedestrian and cycle linkages in particular between Bromsgrove Railway Station and the Town Centre, and improving key junctions including Birmingham Road/Stourbridge Road.
- b) Significant improvements in public transport, will be encouraged particularly to bus services in order to provide an integrated and regular bus service which will connect new and existing residential areas to the Railway Station, with the Town Centre acting as the focal transport hub.
- c) Town Centre Car Parking will be restructured to offer a network of fewer, more efficient car parks at key locations, opportunities for developing smaller more evenly distributed car parks will be considered.
- d) The proposals will contribute towards ensuring accessibility for all.

#### **BDP17.4 Public Realm**

Measures to ensure an attractive and safe Town Centre is created will be encouraged by implementing a new public realm scheme and

complementary design and conservation policies. The High Street will be the focus of public realm improvements.

#### **BDP17.5 Urban Design and Conservation**

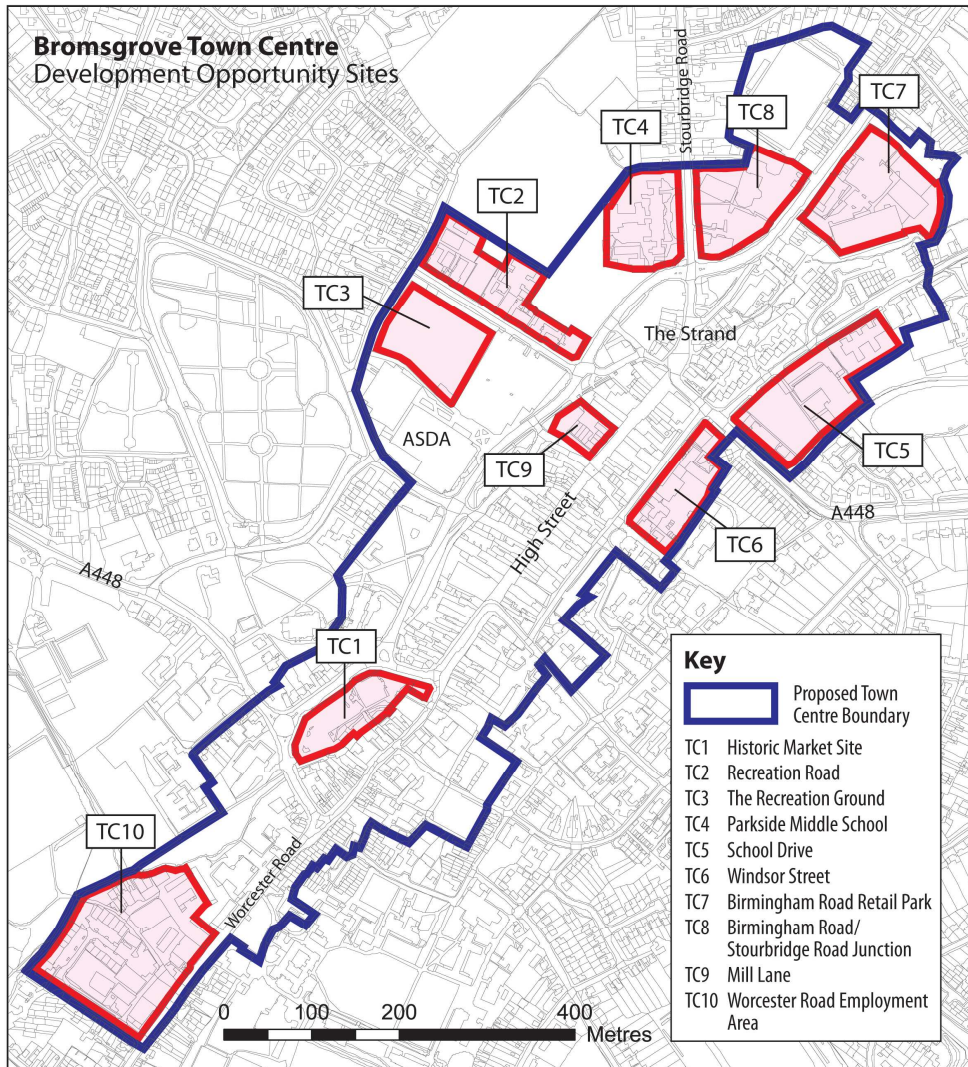
The design of new development should be of the highest quality and respect the historic environment within which it sits. New proposals should encourage more sympathetic and high quality infilling schemes. All development proposals should meet the following principles:

- a) Include high standards of architecture and design, using high quality sustainable materials and building methods.
- b) The sensitive redevelopment of sites which currently detract from the character and appearance of the Town Centre, with new buildings that add to the evolution of the area whilst respecting the scale, height, massing, alignment and materials of adjacent historic buildings
- c) New developments should respect the historic Town Centre street pattern, the established building line, historic spaces between buildings and the overall sense of place.
- d) New buildings are to frame streets and public spaces providing natural surveillance, and preserving and exploiting important views into, within and out of the Town Centre
- e) Design proposals at gateway locations such as the Historic Market Site, Parkside Cross roads and the Stratford Road/ Windsor Street/Strand area to reflect their prominence and importance to the character of the Town Centre.
- f) On specified opportunity sites perimeter blocks are to be used that positively address roads, walkways and public spaces and all ground floors should contain active frontages.
- g) When redeveloping shopfronts particular regard should be had to retaining surviving historic details, respecting established fascia lines, reducing illumination levels wherever possible, avoiding the use of external security measures.

#### **BDP17.6 Natural Environment**

Opportunities will also be encouraged in new schemes to mitigate against and adapt to the effects of climate change, for example, renewable energy and recycling. This will include the naturalisation of parts of the Spadesbourne Brook and improved open spaces like the Recreation Ground and Crown Close to improving the quality and value of open spaces in the Town Centre.

**BDP17.7 Bromsgrove Town Centre Development Sites**  
 Ten development sites have been identified in Bromsgrove Town Centre. The sites provide an opportunity to stimulate development and secure a long term future for Bromsgrove.



**Table X: Town Centre development sites**

Reference	Town Centre Site	Area (hectares)	Suitable Use	Development status
TC1	Historic Market Site	0.7	Retail led mixed use	Application pending
TC2	Recreation Road	1.2	Residential (C3/C2)	Short- medium term
TC3	Recreation Ground	1.1	Open space	N/A
TC4	Parkside Middle School	0.7	Office led with public library	Application pending
TC5	School Drive	1.6	Leisure led	Short-medium term
TC6	Windsor Street	0.8	Retail led mixed use	Medium term
TC7	Birmingham Road Retail Park	1.7	Retail - supermarket	Full planning permission
TC8	Birmingham Road/ Stourbridge Road Junction	1.1	Office led mixed use	Long term opportunity
TC9	Mill Lane	0.2	Retail led mixed use	Long term opportunity
TC10	Worcester Road Employment Area	2.3	Employment led	Long term opportunity

**BDP17.8 TC1 Historic Market Site**

The Historic Market site is a major mixed use development opportunity which the Council will promote for comprehensive redevelopment.

The following principles for development will apply:

A. Retail led mixed use development scheme will be the primary land use.

B. Leisure uses such as cafés, restaurants, and a cinema may also be acceptable on the ground floor. Residential and office uses may be acceptable on upper floors.

C. Scale of development to preserve or enhance the surrounding Conservation Area with protection of notable views including the view to St Johns Church.

D. Where possible perimeter blocks should be used in line with policy BDP17.5F.

E. Design proposals for the north eastern portion of the site (George House/ Blockbuster) must reflect both its prominence as the termination of the High Street and also as the gateway into the historic market site.

F. The Spadesbourne Brook must be considered as part of the public realm element of any proposals, including provision for enhanced walking and cycling opportunities.

G. All proposals will be required to contribute to public realm improvement to ensure this site is linked into the wider Town Centre.

H. All revised car parking proposals must be consistent with the wider car parking strategy for the Town Centre.

#### **BDP17.9 TC2 Recreation Road**

The Recreation Road site is a major residential development opportunity. The following development principles will apply:

- A. The predominant land use will be independent retirement led residential units (C3) with inclusive optional care and support services, other acceptable uses are ancillary nursing care (C2) and limited general needs housing.**
- B. Development must have an active frontage onto Recreation Road, and respect the scale of the surrounding buildings and the setting of the adjacent Conservation Area.**
- C. Clear, safe pedestrian access must be provided to the recreation ground opposite.**
- D. 40% of all units will be required to be affordable housing.**

#### **BDP17.10 TC3 Recreation Ground**

The Recreation Ground will remain as open space, although enhanced to provide a more attractive and safe community resource. The following enhancements are proposed:

- A. New hard and soft landscaping which are consistent with public realm proposals for the High Street and the Spadesbourne Brook and which provide clear pedestrian linkages to other areas of the Town Centre.**
- B. The creation of a new distinctive multi- functional public event/performance space.**
- C. New children play facilities constructed with natural materials.**
- D. A fully accessible community garden which incorporates many high sensory elements.**

#### **BDP17.11 TC4 Parkside Middle School**

The former Parkside Middle School is a Grade II Listed Building and therefore would have to undergo sympathetic conversion for development potential to be realised. The following development principles will apply:

- A. Office conversion is considered to be the most suitable use, although other uses may be acceptable.**
- B. Full regard to the buildings listed status will be essential for all proposals.**
- C. Development will be required to contribute to the reinstatement of the avenue of lime trees on Market Street.**

#### **BDP17.12 TC5 School Drive**

The School Drive site is a major leisure development opportunity site within the Town Centre, which has an important role to play in integrating the Artrix, Bromsgrove North High School, NEW College and the proposed replacement Fire and Police station into the Town Centre community.

Development should meet the following principles:

- A. A leisure centre with associated parking and complementary uses including possible new public sector facilities will be the predominant use on site.**
- B. Residential development is considered acceptable.**

- C. The new leisure centre should contain, a swimming pool, fitness suite, multifunctional studios, sports hall facilities and ancillary uses such as café/ restaurant will also be acceptable.**
- D. Other small scale retail and commercial development could also be acceptable as part of a comprehensive scheme.**
- E. All buildings must have a frontage onto School Drive and where possible Stratford Road.**
- F. Proposals must be considered in tandem with other major development proposals on Windsor Street, and contribute positively to creating clear functional links between the Town Centre and uses further along School Drive.**

#### **BDP17.13 TC6 Windsor Street**

**The Windsor Street site is a major mixed use development opportunity which has the ability to enhance and expand the Towns retail offer.**

- A. The northern end of the Windsor Street will be developed as a retail led mixed use scheme.**
- B. All development must respect the function, scale and massing of buildings on the High Street in order to complement rather than dominate the Town Centre's retail focus.**
- C. All development at ground level will contain active retail frontages onto Windsor Street and Stratford Road.**
- D. Individual Retail floorspace footprints will need to be a minimum of 1000m<sup>2</sup> to compensate for the lack of larger foot print buildings on the High Street.**
- E. Other uses such as office and residential will be encouraged on upper floors.**
- F. Proposals must be considered in tandem with other major development proposals on School Drive.**

#### **BDP17.14 TC7 Birmingham Road Retail Park**

**The site which is already subject of a development proposal has significant potential for substantial supermarket style retail development. The following principles will apply:**

- A. The site will be reconfirmed as a retail site within the Town Centre, which will become part of an extended Primary Shopping Zone.**
- B. Development must be brought forward onto Birmingham Road to reinstate the active street frontage to this important gateway into the Town Centre.**
- C. The listed buildings on Birmingham Road must be retained in their current form and any development proposals must respect the scale of these buildings.**
- D. Improved pedestrian and landscaping links with the core of the Town Centre must form part of any comprehensive development proposals.**
- E. Open space to the rear of the existing store will be retained and form part of the enhanced Spadesbourne Brook.**
- F. Improvements will also be required to the road infrastructure at the junction of Stourbridge Road, Birmingham Road, Market Street and the Strand.**

#### **BDP17.15 TC8 Birmingham Road / Stourbridge Road Junction**

This site offers an opportunity for office led mixed use development. The following development principles will apply:

- A. A perimeter block arrangement will be encouraged to reinstate street frontages.**
- B. High quality distinctive architecture will be required to establish the Parkside Crossroads as a key gateway into the town.**
- C. The scale of the development on Birmingham Road would need to respect development taking place on the Birmingham Road Retail Park.**
- D. The Stourbridge Road frontage would need to have regard to the former Parkside School opposite.**

#### **BDP17.16 TC9 Mill Lane**

This site offers a longer term opportunity for retail led mixed use development. The following development principles will apply:

- A. At ground floor level A1 retail uses are to be the predominant use with upper floors suitable for office and residential development.**
- B. The scale of retail development is to be determined although the scope to include larger retail spaces must be considered.**
- C. Proposals must include details of public realm improvement on Mill Lane and the creation of an enhanced public space and would require a development which reflects the role of this space as a 'town square'.**
- D. Spaces to the rear of the current buildings which are adjacent to the Brook must have full regard to the enhanced environment created by the naturalised Spadesbourne Brook.**
- E. The current pedestrian thoroughfare along Mill Lane will be protected in any development proposals.**

#### **BDP17.17 TC10 Worcester Road Employment Area**

Proposals for new employment uses will be supported within the existing employment allocation. Subject to BDP14 other uses may be acceptable where it can be demonstrated that they support the wider enhancement of the Town Centre and do not compromise the existing retail core of the Town Centre.

**BDP17.18 Any major redevelopment proposals should reflect the linear nature of the Town with active frontages along Worcester Road, although opportunities exist for a wide range and scale of design approaches on other areas of the site. The eastern edge bounded by the Spadesbourne Brook and Sanders Park must address these features and where possible look to use these features as a positive design element.**

#### **BDP 18 Local Centres**

8.226 Bromsgrove Town is the main shopping location in the District, whilst Local Centres provide vital facilities and services to serve the local populations. It is important that these areas are safeguarded for retail use into the future in order to ensure a sustainable approach to future provision is realised. Further retail development within these centres will be supported providing that it is appropriate to the role, scale and character of the centre. No retail growth figures have been set out for the Local Centres but they are considered

appropriate for a small amount of retail growth in order to fulfil their function of meeting day-to-day needs. The role and function of the Local Centres will be protected by the Council and out-of-centre development that threatens their vitality and viability will be strongly resisted. Allowing limited expansion of existing shops can be key to maintaining their viability. The NPPF promotes town and other centres as important places for communities and the Government wants new economic growth and development for main town centre uses to be focused in existing centres to ensure their vitality and viability.

8.227 The District Council recognises the important function of retail facilities and their contribution to community life across all settlements within the District. In order to maintain the concentration of shopping facilities in the large settlements, the District Council has identified the area where the majority of retail and related uses are located (as indicated on the Policies Map). Where new retail uses are proposed in this area, the District Council will expect the schemes to be compatible with the scale and form of the original buildings to which they apply. The loss of retail units within the shopping frontages may jeopardise the strength of the shopping area as a whole. The District Council will be keen to retain these facilities wherever possible. Equal importance is attached to resisting the extension of retail and related uses into adjoining residential areas with the potential loss of housing stock, unless there are exceptional reasons for doing so. Although some non-retail related uses are beneficial to Local Centres and the provision of sustainable communities, they will need to be a proven local need.

### **Consultation Feedback**

8.228 Although this is a new policy, there were a number of comments from the DCS2 and the Draft Town Centre AAP that have influenced this policy. There were concerns from numerous residents as to whether current centres can cope with the increased populations and the affect it will have on infrastructure. There was a growing consensus that people want to shop near to where they live and have more comprehensive centres. Depending on the settlement, some responses felt there was a well balanced mix of shops in their local centres, whereas some responses said there were limited retail amenities. As with BDP12 Sustainable Communities there was considerable support for resisting the loss of existing facilities.

### **Sustainability Appraisal**

8.229 This policy aids numerous social objectives in terms of sustainability. The provision of mixed used in Local centres, with particular regard for retail facilities, mean these areas become more sustainable. People would be less likely to travel further afield for certain facilities and services, allowing more sustainable travel choices. This in turn can have effect on the health and well-being of local communities as they are more likely to walk or cycle to the centres. As cars could potentially be used less, there are also environmental advantages to this policy as there are possible improvements to air quality and the effects of climate change.



8.230 Creating active frontages and complimenting uses above retail units can reduce crime and anti-social behavior by providing natural surveillance there is also the potential for vacant buildings to be used for local retail facilities, which is an effective use of land and would help to retain the retail character of the centres. The Sustainability Appraisal showed there were no known weaknesses to the policy.

## **BDP 18 Local Centres**

**18.1 Within the areas defined on the Policies Map the District Council will allow proposals for retail development (Class A Uses) at ground floor level and retail, office or residential use at upper floor level. These areas are defined as Local Centres for shopping purposes in accordance with the provisions of Policy BDP2.**

**18.2 The District Council will only allow retail proposals which are capable of being integrated with the existing shopping frontages and which do not extend the shopping area. Planning permission for new local shops will be granted provided they are of an appropriate scale and it can be demonstrated that they will not undermine the vitality or viability of existing village facilities or those in Local centres and that there are no adverse impacts on residential amenity and road safety.**

**18.3 Throughout the District, the loss of a shop or service falling within Class A Use will be resisted unless it is demonstrated to be unviable or not required by the community. It may be considered appropriate for a non-retail related facility or service, where there is a proven need and where the development has overwhelming benefits for the local centre and the community. Applications for alternative uses of land or buildings will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable Local centres and their communities.**

## **BDP 19 High Quality Design**

### *Good design*

8.231 Good design is a key aspect of sustainable development. Good design can help to create thriving places which are well designed, well built, inclusive and safe, well run, well connected, well served, environmentally sensitive and have the potential to improve life chances. Good design principles operate equally in urban, suburban and rural contexts. They operate at all scales of place – at the different scales of the town, the neighbourhood, the street, and the individual building. They relate to all forms of movement – on foot, by bicycle, by car, and by public transport. Good design has robustness - an inherent quality that will last beyond completion of construction of any particular building<sup>23</sup>.

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<sup>23</sup> Design Council (2012) "A Design Wayfinder"

8.232 The Council will expect all developments to follow and apply tools, guidance and procedures to achieve good design at all scales. A list of useful tools and guidance is included below, which will be updated as necessary. A Design Guidance Supplementary Planning Document will also be produced to provide further advice.

Useful Tools/ Guidance/ Procedures	
<i>Standards and quality in development – a good practice guide, 2<sup>nd</sup> edition</i> (National Housing Federation, 2008)	The guide contains advice and standards in relation to the key skills needed in the development process. It provides an overview of urban design issues that should be considered when designing the external environment, shared and communal areas and the internal environment.
<i>Urban Design Compendium</i> (Homes and Communities Agency, 2000)	The two Urban Design Compendium publications outline the key aspects of urban design and how these can be applied to create places where people want to live, work and socialise. It also provides practical guidance on the steps that can be taken and barriers that need to be overcome during policy and project development to improve the quality of place delivered.
<i>Better places to live by Design</i> (Office of the Deputy Prime Minister and Commission for Architecture and the Built Environment, 2001)	The guide focuses on the attributes that underlie successful residential environments in order to provide guidance on implementing the new approach to planning for housing
<i>Manual for Streets</i> (Communities and Local Government, Department for Transport, 2007)	The manual provides a set of principles that focus on lightly-trafficked residential streets, but many of its key principles may be applicable to other types of street (not trunk road network)
<i>Manual for Streets 2</i> (Chartered Institution of Highways and Transportation, 2010)	The manual complements <i>Manual for Streets</i> and provides guidance that extends beyond residential streets to busier streets and roads both in urban and rural locations up to, but not including, trunk roads.
<i>By Design. Urban design in the planning system: towards better practice</i> (CABE, 2000)	The guide aims to encourage better design and to stimulate thinking about urban design. It covers all aspects of the built environment, from the design of buildings and spaces, landscapes, to transport systems; and for planning and development at every scale, from streets and their neighbourhoods, villages and cities.
<i>Car parking: what works where</i>	This toolkit highlights the most appropriate car parking approach according to density of

(English Partnerships, 2006)	development and housing typology.
<i>Creating successful masterplans: a guide for clients</i> (CABE, 2011)	A step by step guidance for creating a successful masterplan
<i>Design Review</i>	The NPPF refers to design review arrangements to ensure high standards of design in developments. MADE in the West Midlands ( <a href="http://www.made.org.uk">www.made.org.uk</a> ) is part of an England-wide design review service which has signed-up to an agreed set of principles of quality design review.

### *Local Distinctiveness*

8.233 Different elements interacting with each other contribute to the local character of a place. In the macro level, the Landscape Character Assessment and Historic Landscape Character Assessment of Worcestershire define the elements that contribute to the local character in terms of settlement pattern, tree cover, land use and field morphology all underpinned and influenced by inherited and extant historic attributes. In the micro level, elements such as street pattern, building layout, building types, architectural styles and features, building materials, building line, individual trees and green spaces, key buildings, archaeology, boundary treatments also play a role in defining the character of an area. For example, Bromsgrove District is predominantly a 'red brick' area because of the minerals in the local clay.

8.234 The District has a variety of character, with those that have very special architectural or historic interest designated as Conservation Areas, Listed Buildings, Scheduled monuments or Registered Parks and Gardens. Elsewhere there are landscape character areas and historic assets that significantly contribute towards the character of the District. However, many of the post war developments in the District are divorced from and out of scale with their surroundings. This also applies to the more recent housing estates which are built with standard house types and layout. They do not respond to local character and could be found anywhere in the Country. To enhance the local distinctiveness of Bromsgrove District, it is important that all new developments appraise its surrounding areas at the macro and micro level, identify the elements that would enhance the local distinctiveness of the area and incorporate them into the design of the development. The Council will expect all applications to explain how the design of the development recognises, relates to and enhances the local character of the area.

### *Spaces and places*

8.235 Good design is important not only in buildings, but also in the public spaces between buildings - the public realm. Streets are the most common form of public space, and once designed and constructed they cannot easily be changed. Streets are social spaces as well as spaces for transport and movement, and part of good design is place-making - making spaces into places with identity and meaning. Public art can make a place distinctive.

Streets, spaces and public art are therefore major elements of place-making and creating a successful neighbourhood.

8.236 Many poor connected developments with road-dominated layout encourage people to use car, which has led to fewer opportunities for people to meet and socialise. This can contribute to social exclusion, and a loss of local identity in neighbourhoods. To achieve well-design homes and neighbourhoods, the Council will expect all housing developments to follow the design principles in the external environment section of the Standards and Quality in Development: A good practice guide and use Building for Life as a tool to facilitate design conversation at all stages of the development process. The Council will expect development to achieve the highest standard of Building for Life. Under Building for Life 12, this would be achieving all twelve “greens” and the completed development be eligible for the ‘Building for Life Diamond’ status.

#### *Sustainable Design and Construction*

8.237 It is well understood that most development damages the natural environment and it is important that the resulting damage to the environment can be minimised. The Code for Sustainable Homes and BREEAM are the widely adopted tools for rating and measuring the sustainability performance of domestic and non-domestic buildings. In Bromsgrove, it is tested viable in the Affordable Housing Viability Study to require affordable housing development to meet the Code for Sustainable Homes Level 6, and market housing to meet Code Level 4 now, and to meet Level 6 by 2016. For non-residential development, the Council expects development to meet the BREEAM ‘very good’ standard.

#### *Functional Residential Space*

8.238 Adequate space is a pre-requisite for basic living. There should be enough room for residents to cook, eat, relax and socialise. There should be sufficient space for furniture and the storage of personal possessions. If homes are to have a long life, they must offer functional and adaptable spaces that meet the needs of families, children, older people and disabled residents. *The Case for Space* report<sup>24</sup> highlights that many new houses are failing to provide the space families need, both inside and outside. *The Way We Live Now*<sup>25</sup> report also shows how people live today, what they need and expect from their homes, and whether the design and delivery of new homes is fit for purpose. Other countries commonly set space standards, and research indicates that levels of space in homes in England are near the bottom of the range in comparison with other European countries<sup>26</sup>. CABE recommends that local authorities should introduce or apply existing minimum space standards through their planning departments<sup>27</sup>. Building to suitable space standards will

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<sup>24</sup> Royal Institute of British Architects (2011) “*The Case for Space – The size of England’s new homes*”, RIBA

<sup>25</sup> Royal Institute of British Architects (2012) “*The way we live now: what people need and expect from their homes*”, RIBA

<sup>26</sup> Swingacat website ([http://www.swingacat.info/facts\\_figures.php](http://www.swingacat.info/facts_figures.php))

<sup>27</sup> Commission for Architecture and the Built Environment (2009) “Space in new homes: what residents think” CABE

ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances. The internal environment section of the Standards and Quality in Development: A good practice guide outlines a series of minimum sizes for essential items of furniture, and kitchen and bathroom fixtures and fittings; the space generated by their use; the areas needed for storage of general household items; circulation and access zones; and the main services and sound insulation levels from a resident-based 'functionality' perspective.. To ensure sufficient functional space is provided for future residents, the Council will expect all residential developments to meet the minimum sizes in the guide.

#### *Development in residential gardens*

8.239 Homes with large back gardens are common feature in Bromsgrove District, and previously a notable number of housing completions have come from developments on garden land. Although garden land was previously defined as brownfield land in PPS3, the NPPF now states that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens. This does not mean that all development on garden land should be refused, but rather that careful consideration should be given to any proposals and whether there are any mitigating factors. One of the most important considerations for determining applications on garden land will be the retention of the existing character of residential areas. Development which significantly increases the proportion of ground coverage by buildings, or the scale of proposed buildings, is likely to be out of keeping with its surroundings and therefore is likely to be unacceptable and will be refused.

#### *Design and criminal behaviour*

8.240 The reduction of crime, and the fear of crime and anti-social behaviour are identified as important issues for Bromsgrove in the *Sustainable Community Strategy*. Previous consultations show that most people favour the promotion of designing out crime initiatives. The Council therefore expects all development to meet the 'Secured by Design' standard, unless it contradicts with principles of good spatial design on site. Good crime prevention/ safety measures are also good counter terrorism protective security. For example, access control, blast resistant glazing and structural design can make unauthorised entry more difficult, and reduce casualties in case of gas explosion. So where relevant and appropriate, the Council will encourage developments in crowded locations, or those expected to become crowded, to take into account the design principles in *Crowded Places: The Planning System and Counter- Terrorism and the relevant guidance*<sup>28</sup>.

#### *Air noise pollution and land contamination*

8.241 Air quality in the District is predominantly good and the air is mainly clean and unpolluted. There are however a few locations where the combination of traffic, road layout, geography, emissions from plant and machinery such as boilers has resulted in exceedences of the annual average for nitrogen dioxide

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<sup>28</sup> <http://www.nactso.gov.uk/crowded-places>

(NO<sub>2</sub>) and fine particulates (PM<sub>10</sub>). Several areas in the District are closely monitored for their air quality level, and a few are designated as Air Quality Management Areas (AQMA).

8.242 The focus of action to improve air quality has predominantly been on road transport and therefore low emission transport and building strategies are encouraged. Noise pollution is also a problem for areas particularly near to busy roads. Soft landscaping, in particular trees, which deliver multiple benefits as mentioned in *BDP24 Green Infrastructure*, in some cases also provide some attenuation of noise levels. Many developments only incorporate protected trees in their design, leaving the development with only hard landscaping and limited soft landscaping which, compared to trees, are more expensive to maintain and produce fewer long term benefits. The Council expects substantial new planting to be provided in new developments where it is appropriate, to provide benefits of biodiversity, the absorption of carbon, noise attenuation, and visual pleasure. All trees and woodland planting should take into account of Worcestershire County Council's guidance *Trees and Woodland in Worcestershire*<sup>29</sup>.

8.243 Bromsgrove generally has good or excellent land quality but our industrial, commercial and agricultural heritage means that there are many sites which have had one or more industrial or commercial uses which may have resulted in soil and water contamination that may need to be addressed.

#### *Residential density*

8.244 As high quality design can only be achieved through careful consideration of the characteristics in the locality, density which measures the number of houses per hectare is only an outcome of the design process rather than an indicator of quality. The Council acknowledges in *BDP4 Green Belt* that the land identified in this Plan can only meet the housing needs till 2022/23, it is therefore important that when designing a development, the design should also aim to make the best use of land in accordance with *BDP7 Housing Mix and Density*.

#### **Consultation feedback**

8.245 There was some support for the policy, in particular the reference to design out crime, soft landscaping, trees retention and the user hierarchy. There were some misunderstandings that the policy tries to keep all trees rather than those considered appropriate.

8.246 Some questioned the legitimacy of imposing the HCA space standards beyond affordable housing. As one of the aims of planning is to plan for houses that meet people's needs and expectations, it is considered that developers should take into account other published evidence and meet the requirements where viable.

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[http://www.worcestershire.gov.uk/cms/pdf/Woodland%20guidelines\\_final%20doc\\_23%20Nov%202010.pdf](http://www.worcestershire.gov.uk/cms/pdf/Woodland%20guidelines_final%20doc_23%20Nov%202010.pdf)



8.247 Some raised concerns that the policy reference to the Building for Life and West Midlands Sustainability Checklist elevates the status of the two tools, would create potential conflicts with PPS3 and would create extra burden for developers. Also, funding for the West Midlands Sustainability Checklist has stopped and some suggested developing a local checklist. As Building for Life and West Midlands Sustainability Checklist are only assessment tools guiding developments to achieve good design, it is not considered that policy reference conflicts with national policy which also seeks high quality design. There is also no evidence to suggest that high quality design is more costly. There were a few objections on the reference to public art, development accessible to all and creating a place that help people get together. These are considered as important elements of place shaping which will help create a unique image of development and promote people's sense of belonging, and are therefore kept in the revised policy.

### **Sustainability Appraisal**

8.248 The Policy was assessed within the Sustainability Appraisal and has many positive features with respect to environmental, social and economic sustainability with no clear weaknesses.

### **BDP 19 High Quality Design**

**BDP 19 .1 The Council will deliver high quality people focused space through:**

- a. Requiring developments to use appropriate tools and follow relevant guidance and procedure to achieve good design;**
- b. Preparing a Design Guide Supplementary Planning Document;**
- c. Ensuring residential development achieve the highest standard of Building for Life;**
- d. Ensuring all affordable housing to meet the Code for Sustainable Home Level 6 and all market housing to meet Code Level 4 now and Code Level 6 by 2016;**
- e. Ensuring all non-residential developments to meet BREEAM 'very good' standard;**
- f. Ensuring development to enhance the character and distinctiveness of the local area;**
- g. Supporting all major developments that help facilitate interactions between future occupants;**
- h. Promoting developments to include new Public Art;**
- i. Creating and enhancing gateway locations and key approach corridors as well as protecting and enhancing important local and longer-distance visual corridors;**
- j. Ensuring developments are accessible to all users;**
- k. Ensuring permeable, safe and easy to navigate streets layout;**
- l. Avoiding road-dominated layout by supporting the design of street to follow the user hierarchy: 1) pedestrian; 2) cyclists; 3) public transport users; 4) specialist service vehicles (e.g. emergency services, waste, etc.); 5) other motor traffic;**
- m. Requiring residential developments to provide sufficient functional space for everyday activities, meet people's needs and expectations**

- from their homes, and to enable flexibility and adaptability through meeting the internal environment standards in Standards and Quality in Development: A good practice guide;
- n. Development of garden land will be resisted unless it fully integrates into the residential area, is in keeping with the character and quality of the local environment;
  - o. Ensuring developments meet the 'Secured by Design' standard;
  - p. Ensuring all trees that are appropriate (e.g. in terms of size, species, conditions and predicted climate) be retained and integrated within new development;
  - q. Ensuring development incorporates sufficient, appropriate soft landscaping and measures to reduce the potential impact of pollution (air, noise, vibration, light, water) to occupants, wildlife and the environment;
  - r. Ensuring development is made suitable for the proposed final use, for instance, in terms of land contamination. The Council will determine whether reports detailing for example, site history; an appropriate remediation scheme; long term monitoring and maintenance proposals, will need to be submitted in support of any planning application. Such reports will be prepared in accordance with best practice guidance.
  - s. In relation to air quality all new developments with a floor space greater than 1000sqm or 0.5 hectare or residential developments of 10 or more units must not increase nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>10</sub>) and carbon dioxide (CO<sub>2</sub>) emissions from transport and should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance.
    - a. All planning applications meeting the above criteria should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance. The applicant will also take into account the cumulative impacts of validated developments in the local area. Additionally, the assessment should consider the impact of local air quality on the proposed development.
    - b. Development with the potential to result in significant impact on air quality, either cumulatively or individually will be resisted unless appropriate measures to mitigate the impact of air pollutants are included. Development will be expected to contribute to the provision of adequate mitigation measures in accordance with BDP6.
  - t. Development proposals should maximise the distance between noise sources (for example motorways) and noise sensitive uses (such as residential), whilst also taking into account the implications of the existing night time use of the locality.
  - u. Ensuring a feasible and viable management plan is available for all the facilities and provisions arising from the development;
  - v. Ensuring development make the best use of land in accordance with BDP7 Housing Mix and Density



**BDP 19.2 For large scale developments, developers will need to prepare Design Codes for the area, which would then serve to inform all developments in that area as they come forward.**

## **BDP 20 Managing the Historic Environment**

8.249 Bromsgrove District is a diverse, attractive area, which has a real sense of history with 12 designated conservation areas, over 469 statutorily listed buildings, 13 scheduled monuments and 2 historic parks and gardens. There are also hundreds of buildings of local interest and undesignated sites of archaeological interest which contribute to the local distinctiveness of our streets and spaces. The interaction of the natural and built environment is a key characteristic of the Bromsgrove District, with a range of surviving historic settlements and village cores surrounded by open countryside. Historic buildings and spaces are a key component of our shared cultural identity and are a visual representation of how we used to work and live.

8.250 The Council recognises that the historic environment is one of the important factors in making Bromsgrove unique and is a source of local identity and pride. It is therefore vitally important that this is reflected in our approach to the future management of historic assets and that it is given sufficient weight in development decisions. Not all the District's buildings or areas enjoy statutory protection and therefore consideration will be given to putting forward currently unlisted buildings for inclusion on the Statutory List and the designation of new conservation areas.

8.251 Furthermore it is acknowledged that an adopted local list is required to formally identify the locally important heritage assets within the District, although such a list can never be definitive. Many heritage assets within the District which do not currently meet national criteria for statutory listing are of local importance and are worthy of protection and conservation. In particular assets which are notable in terms of local character and distinctiveness are of great importance. Within the District examples would include, nailers cottages, assets associated with the scythe industry and assets associated with the use of the Birmingham and Worcester canal which runs the length of the District, to name but a few. The identification of heritage assets and their management is supported by tools such as the County Historic Environment Record and local area based assessments and audits. Information collected by owners, developers, historians and others is also of importance and continues to expand our knowledge and understanding of the historic environment.

### **Consultation Feedback**

8.252 There was support for the policy however some respondents felt that the policy could be improved. It was argued that the approach to design was too prescriptive and a contemporary approach is not always the right approach. The reference to contemporary design has now been removed with the focus now on achieving development that is sympathetic to historic assets. Some respondents considered that the policy should make greater reference to the Historic Environment Assessment, Historic Landscape Characterisation,

Conservation Area Appraisals and the West Midlands Farmsteads and Landscape Project. The inclusion of a reference to each of these documents was considered unnecessary as many form part of the evidence base for the policy. A reference to the production of appraisals and management plans for each conservation area has been retained. There was support for the inclusion of a local list and the Council agree with this view. The policy now supports the updating and adoption of a local list. Some felt that there should be a greater emphasis on the re-use of buildings and appropriate climate change measures. Greater reference to these issues are now included within the policy.

### **Sustainability Appraisal**

8.253 This policy performs most strongly predominantly in environmental terms as it is very specific in the protection and enhancement of heritage in the District, however the policy does have some social and economic benefits. In social terms the protection and enhancement of such assets can add to the vibrancy and local distinctiveness of the District and also act as cultural, recreational and educational resources. The historic environment contributes to a sense of pride and quality of life and may enrich people's understanding of the diversity and changing nature of their community. In economic terms the preservation of the historic environment can contribute to the area's local distinctiveness. This may have economic benefits, for example, a refurbished historic character property in an area of attractive and well maintained properties may attain a higher price on the open market than an equivalent more modern and larger property due to special, perceived and actual, qualities for example, of uniqueness. Although in some cases the layout and efficiency of historic buildings may be considered unsuitable and inefficient by modern day standards and may in some cases be more costly to restore in terms of required materials and techniques, development that enhances the character and appearance of historic environment may also have the potential to contribute towards tourism and economic growth. Furthermore, the Council recognises that redundant historic buildings offer a range of opportunities for conversion to new uses which can act as a catalyst for regeneration and economic vitality.

### **BDP 20 Managing the Historic Environment**

**20.1 The District Council advocates a holistic approach to the proactive management of the historic environment which encompasses all heritage assets recognised as being of significance for their historic, archaeological, architectural or artistic interest.**

**20.2 The District Council will support development proposals which sustain and enhance the significance of heritage assets including their setting. This includes:**

- a. Designated heritage assets, including listed buildings, conservation areas, scheduled ancient monuments, registered parks and gardens.**

- b. Non- designated heritage assets including (but not limited to) those identified on the local list and assets recorded in the Historic Environment Record.**
- c. The historic landscape of the District, including locally distinctive settlement patterns, field systems, woodlands and historic farmsteads.**
- d. Designed landscapes, including parks and gardens, cemeteries, churchyards, public parks and urban open spaces.**
- e. Archaeological remains of all periods from the earliest human habitation to modern times.**
- f. Historic transportation networks and infrastructure including roads, trackways, canals and railways.**

**20.3 Development affecting heritage assets, including alterations or additions as well as development within the setting of heritage assets, should not have a detrimental impact on the character, appearance or significance of the heritage asset or heritage assets.**

**20.4 Applications to alter, extend, or change the use of heritage assets will be required to provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation whilst preserving or enhancing its significance and setting.**

**20.5 In considering applications regard will be paid to the desirability of securing the retention, restoration, maintenance and continued use of heritage assets, for example, the District Council will support the sensitive reuse of redundant historic buildings, and will encourage proposals which provide for a sustainable future for heritage assets, particularly those at risk.**

**20.6 Any proposal which will result in substantial harm or loss of a designated heritage asset will be resisted unless a clear and convincing justification or a substantial public benefit can be identified in accordance with current legislation and national policy.**

**20.7 Consideration will be given to the designation of new conservation areas. In order to define and protect the special character of conservation areas, the District Council will produce and regularly review character appraisals and management plans for designated conservation areas, and where necessary introduce Article 4 Directions based on an assessment of local identity and uniqueness.**

**20.8 Where a detailed Conservation Area Appraisal Management Plan has been adopted, it will be a material consideration in determining applications for development within that conservation area.**

**20.9 Development within or adjacent to a conservation area should preserve or enhance the character or appearance of the area.**

**20.10 The demolition of buildings or the removal of trees and other landscape features which make a positive contribution to an area's character or appearance will be resisted.**

**20.11 Outline planning permission will not be granted for development within Conservation Areas unless supported by detailed proposals showing siting, design, external appearance and the relationship with adjacent properties.**

**20.12 The District Council will update the current draft local list of assets and formally adopt it. It would include all heritage assets recognised as being of local importance, including those which are locally distinctive such as nailers cottages, assets associated with the scythe industry and assets associated with the use of the Birmingham and Worcester canal which runs the length of the District, to name but a few.**

**20.13 The District Council will support development that:**

- i. Retains locally listed buildings.**
- ii. Involves sympathetic alterations and extensions to locally listed buildings**
- iii. Does not have a detrimental impact on the setting or context of locally listed buildings.**

**20.14 In considering applications that directly or indirectly affect locally listed buildings, a balanced judgement will be applied having regard to the scale of any harm or loss as a result of proposed development and the significance of the locally listed building.**

**20.15 The District Council will encourage opportunities to develop Green Infrastructure networks that can enhance the amenity value of the historic environment (refer to BDP24 Green infrastructure).**

**20.16 The District Council will promote a positive interaction between historic sites and places and high quality modern developments which allows for evolution and positive change whilst preserving and respecting the significance and setting of existing heritage assets.**

**20.17 Applications likely to affect the significance of known or potential heritage assets or their setting should demonstrate an understanding of their significance in sufficient detail to assess the potential impacts. This should be informed by available evidence and, where appropriate, further information to establish significance of known or potential heritage assets.**

**20.18 Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural, artistic or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The**

information and understanding gained should be made publicly available, as a minimum through the relevant Historic Environment Record.

**20.19 The District Council will continue to undertake studies to inform local decision making and support the future growth of the Worcestershire Historic Environment Record. They will also encourage Neighbourhoods to address issues of character, heritage and design in their Neighbourhood Plans.**

**20.20 The District Council will embrace opportunities to mitigate the effects of climate change by seeking the reuse of historic buildings and where appropriate their modification to reduce carbon emissions and secure sustainable development without harming the significance of the heritage asset or its setting.**

## **BDP 21 Natural Environment**

8.254 The NPPF recognises that sustainable development involves seeking positive improvements in the natural environment including achieving net gains for nature. The natural environment encompasses different components, including biodiversity, geodiversity and landscape character. They are mutually dependent and should therefore be considered together.

8.255 In the UK, over 40% of priority habitats and 30% of priority species<sup>30</sup> are declining. In the Convention on Biological Diversity in Nagoya 2010, the Government agreed to halt the alarming global declines in biodiversity and has set a vision for England:

“By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone”.

8.256 In order “to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people”<sup>31</sup>, the Government has set national targets in the England Biodiversity Strategy and established an institutional framework to achieve the recovery of nature , including establishing:

### *1. Local Nature Partnerships*

In July 2012, the Worcestershire Partnership Environment Group has successfully gained the Local Nature Partnership status and has the strategic focus on green infrastructure, green economy and valuing Worcestershire’s environment.

### *2. Voluntary biodiversity offsetting schemes*

The Worcestershire County Council is working with Defra on complementary projects and the information gathered will feed in to the independent evaluation

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<sup>30</sup> UK Biodiversity Action Plan highlights report, 2008 reporting round in Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services, 2011

<sup>31</sup> “to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people” is the mission of the Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services, 2011

of the biodiversity offsetting scheme. The trial will be completed by April 2014 and Defra will make a decision on the next steps after.

### 3. *Creating Nature Improvement Areas.*

8.257 One of the twelve Nature Improvement Areas (NIA) that won government's funding – the Birmingham and the Black Country NIA - and the Forest of Feckenham and the Black Country Living Landscape scheme run by the Wildlife Trust are right at the administrative boundary of Bromsgrove District.

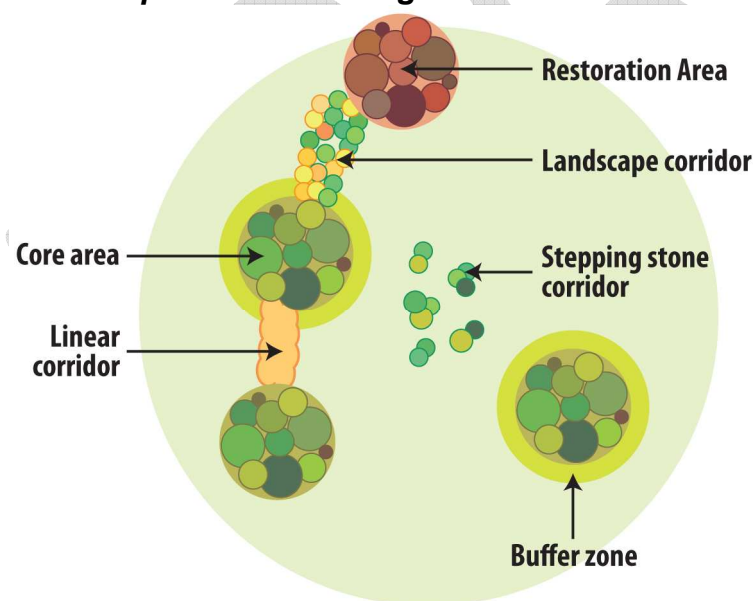
8.258 To ensure that a well-functioning, coherent and resilient ecological network is established, the Council expects all development to take into account and contribute towards meeting the national and local environmental targets, the environmental priorities of the Worcestershire Partnership Environment Group, participate in the biodiversity offsetting scheme (or its replacement) and connect to the Nature Improvement Area(s) and Living Landscape schemes where relevant.

8.259 Relevant national and local environmental targets include:

- the targets and actions for priority habitats and species set in the England Biodiversity Strategy, the UK, Worcestershire and Bromsgrove Biodiversity Action Plans or its replacements;
- the targets and actions set in the Worcestershire Geodiversity Action Plan,
- the relevant targets and priorities set in local strategies, such as the Water Vole Strategy.

### **Approach**

#### ***The components of ecological network***



8.260 To address fragmentation and restore the ecological network, the Council will require developments to take into account the following five components from a landscape scale perspective:

1. *Protect and enhance core areas of high nature conservation value*  
Bromsgrove District is well known for its attractive Worcestershire countryside which includes a diverse range of biological and geological assets of national and local importance. Some of these natural assets benefit from statutory

protection, such as the 13 Sites of Special Scientific Interest (SSSI's) and the habitats and species listed in Section 41 of the Natural Environment and Rural Communities Act (2006)<sup>32</sup>, but many do not, such as ancient woodlands and locally designated sites. There are 90 Local Sites (85 wildlife<sup>33</sup> and 5 geological<sup>34</sup>) in the District. All of these areas are core areas and any development that would compromise the favourable conservation status of these core areas will not be permitted.

2. *Protect and create corridors and 'stepping stones'*  
Linking and restoring habitats, creating stepping stones are vital to the continued survival of wildlife in a changing climate. Water voles, once common in Worcestershire, are now only recorded as being present in Bromsgrove District. Like many other protected and important species, present water vole populations are small and fragmented and therefore prone to extinction. Road and motorway verges, hedgerows, watercourses, disused railway lines are the most common corridors used by wildlife. These habitats should be protected and enhanced to safeguard species, for example, culverted and canalised watercourses should be opened up and naturalised whenever possible.
3. *Enhance restoration areas*  
The 2009 Special Wildlife Sites review shows that some sites have been lost due to the deterioration of the habitats. Information provided by the Earth Heritage Trust also shows that some geological sites are lost or in poor condition. These casualties are a loss to the District's biological and geological heritage and should therefore be restored whenever possible.
4. *Protect and create buffer zones – areas that protect core areas, restoration areas and 'stepping stones' from adverse impacts in the wider environment*  
Buffer requirements for different habitats and species vary from developments and their main purpose is to protect core areas, restoration areas and 'stepping stones' from adverse impacts in the wider environment. The Council will expect sufficient buffers are created to keep adverse impacts at an acceptable level.
5. *Ensure sustainable use areas – areas of surrounding land that are managed in a sustainable and wildlife friendly way*

8.261 The UK National Ecosystem Assessment showed that nature is consistently undervalued in decision-making and that valuable habitats and species are not confined to protected areas, therefore development should not assume that undesignated areas are low in ecological or geological value. To ensure that the District will carry on to enjoy the ecosystems services in the future, Bromsgrove will expect development to follow the mitigation hierarchy (that is biodiversity damage from development should first be avoided, then mitigated on-site and finally, as a last resort and where acceptable, offset), provide net gains<sup>35</sup> in biodiversity and deliver multiple benefits in line with BDP24 Green Infrastructure. To ensure that the environmental impacts of construction is minimised, the Council will expect development to adopt good

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<sup>32</sup> Explanatory note of S41 of NERC Act from Defra is available at [http://www.merseysidebiodiversity.org.uk/pdfs/S41%20List%20-%20Explanatory%20Note%20\\_final\\_.pdf](http://www.merseysidebiodiversity.org.uk/pdfs/S41%20List%20-%20Explanatory%20Note%20_final_.pdf)

<sup>33</sup> These are formerly referred as "Special Wildlife Sites" (SWS) in Worcestershire.

<sup>34</sup> These are formerly referred as "Regionally Important Geological and/or Geomorphological Sites" (RIGS)

<sup>35</sup> The Council will adopt the metric for the biodiversity offsetting pilot in England published by the Department for Environment, Food and Rural Affairs or its replacement as a method for working out biodiversity gains in development

environmental site practices as appropriate, such as a Construction Environmental Management Plan (CEMP) or equivalent.

8.262 Landscape, which results from the interaction between the nature and culture of a place, directly affects our quality of life. In the past, landscapes of local importance were protected through rigid local designations, whilst the impact of developments outside of these areas was not normally considered. However, it is now recognised that all landscapes matter. The Worcestershire Landscape Character Assessment identifies the distinct, recognisable and consistent pattern of landscape elements in Bromsgrove. To ensure the landscape character of the District is enhanced, the Council will expect the design of all developments to take the Landscape Character Assessment into account and result in landscape gain. Details can be found in the Landscape Character Supplementary Guidance.

### **Consultation Feedback**

8.263 There was support for the policy and some would like to see greater protection for several habitats such as ancient woodlands and trees and stronger policy wordings such as replacing 'protecting' by 'safeguarding'. Some also referred to functional and ecological connectivity, landscape-scale thinking and suggested to include a direct reference to the Green Infrastructure policy, the Habitat Inventory and the 'Living Landscape' projects. Most comments are incorporated into this revised policy.

There was also criticism that the policy repeats the national policy and other legislative requirements. It was suggested that illustrative maps should be included. It was considered that the policy build on national guidance and in many cases are locally distinctive. Also, to ensure that the most up-to-date information is used, it is not considered illustrative maps should be included.

### **Sustainability Appraisal**

8.264 The Policy was assessed within the Sustainability Appraisal and performs well in environmental terms and has some social benefits but these will need to be carefully balanced against economic objectives on a site by site basis.

## **BDP 21 Natural Environment**

**BDP 21.1 The Council will seek to achieve better management of Bromsgrove's natural environment by expecting developments to:**

- a) Protect, restore, enhance and create core areas of high nature conservation value (including nationally and locally protected sites and irreplaceable nature resources such as sites with geological interest, ancient woodlands and habitats of principle importance), wildlife corridors, stepping stones and buffer zones.**
- b) Take appropriate steps to maintain the favourable conservation status of populations of protected species.**
- c) Protect, restore and enhance other features of natural environmental importance, in line with local environmental priorities.**
- d) Design-in wildlife, maximise multi-functionality in line with BDP24 Green Infrastructure and provide appropriate management, ensuring development follows the mitigation hierarchy and achieves net gains in biodiversity.**



- e) **Contribute towards the targets set out for priority habitats and species, the environmental priorities of the Local Nature Partnership, participating in the biodiversity offsetting scheme or its replacement, and connect to the Nature Improvement Area(s), the Living Landscape schemes or their equivalents, as appropriate.**
- f) **Deliver enhancement and compensation, commensurate with their scale, which contributes towards the achievement of a coherent and resilient ecological network.**
- g) **Protect and enhance the distinctive landscape character of Bromsgrove, as identified in the Worcestershire Landscape Character Assessment, and take account of the Worcestershire Landscape Character Assessment Supplementary Guidance.**
- h) **Contribute to the conservation and enhancement of geodiversity, in line with the objectives and actions in the Worcestershire Geodiversity Action Plan, where appropriate.**
- i) **Adopt good environmental site practices as appropriate, including in the form of a Construction Environmental Management Plan (CEMP) where appropriate.**

### **8.265 Clean, Green and Healthy**

BDP 22 Climate Change  
 BDP 23 Water Management  
 BDP 24 Green Infrastructure  
 BDP 25 Health and Well Being

The natural environment is one of the Districts greatest assets with 91% of the District designated as Green Belt. It is important to ensure that new development respects and interweaves with the natural environment creating an attractive, safe and healthy place to live, work and visit, both now and into the future. There are also policies which recognise the impact of climate change on our sensitive environment and strive to reduce these impacts.

### **BDP 22 Climate Change**

8.266 Worcestershire has already felt the impacts of extreme weather events in recent years and will continue to be vulnerable in the future as climate changes. Climate projections for the County indicate that the average daily maximum summer temperature could increase by 7.5°C by 2050s. Rainfall is also likely to be affected, with a potential increase of up to 33% in summer by 2050s<sup>36</sup>. There are two aspects of climate change to consider, the impact we can have to the climate, that is mitigation, and the impact the climate can have on us, that is adaptation.

### **Mitigation – Reducing energy use and Moving away from fossil-fuel**

<sup>36</sup> Worcestershire County Council (2013) “Draft Worcestershire Climate Change Strategy 2012-2020”. Projections is based on medium emissions scenario for 2020s using 90% probability level.

8.267 The Climate Change Act 2008 introduced a statutory target of reducing carbon dioxide emissions by 34% below 1990 levels by 2020 and seeks an 80% reduction in emissions by 2050. To achieve the 2050 target, analysis by the Committee on Climate Change shows that it will require a step change in the pace of emissions reduction across all sectors<sup>37</sup>, including buildings energy efficiency measures, surface transport, waste and renewable projects, which is where local authorities have most scope to influence emission reductions .

8.268 Bromsgrove's published Climate Change Strategy (2010) aims to achieve 3% local reduction yearly from 2008 onwards based on the 2005 emissions. In Worcestershire, our energy consumption is drawn almost exclusively from fossil-fuel based sources<sup>38</sup>. In order to reduce the carbon-emissions generated from this energy use, improve the energy affordability to local businesses and households and maximise the opportunities of local job creations, all developments in the District are required to follow the energy hierarchy, i.e. 1) reduce use of energy through good design; 2) make the most use of efficient energy, heating and cooling systems; 3) move to energy from renewable or low carbon sources (on site preferred to off-site); 4) use remaining fossil fuels efficiently.

### **Reducing Energy Use**

#### *Existing buildings*

8.269 A large proportion of Bromsgrove district's existing older housing stock is in need of improvement in terms of adequate insulation. The average energy performance of buildings in Bromsgrove is D, with 8.8% of homes rated E or below<sup>39</sup>. From 2013, the Green Deal<sup>40</sup> and Energy Company Obligation<sup>41</sup> will be in place to help householders and the non-residential sector<sup>42</sup> fund energy efficiency measures installations. The Council therefore encourages developments in existing building (such as extensions, change of use) to achieve consequential energy efficiency improvements.

#### *Energy Efficiency in new buildings*

8.270 It is the Government's ambition for all new homes to be zero carbon by 2016 and new non-domestic buildings to be zero carbon by 2019<sup>43</sup>. The Government's approach to achieve zero carbon home is through revising Part L

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<sup>37</sup> Committee on Climate Change (2012) "How local authorities can reduce emissions and manage climate risk". Committee on Climate Change

<sup>38</sup> Planning for Renewable Energy in Worcestershire

<sup>39</sup> EPC Register Data, Communities and Local Government

<sup>40</sup> The Green Deal will provide finance for investment in energy efficiency measures at no up-front cost to the householder. Finance will be secured as a charge on the property to be repaid through the electricity bill over a period of up to 25 years.

<sup>41</sup> The Energy Company Obligation is the new legal obligation on energy suppliers to deliver emissions reductions to vulnerable and low income groups, and through implementation of solid wall insulation more generally.

<sup>42</sup> In the case of extensions for existing buildings exceeding 1000m<sup>2</sup>, building regulations have a requirement for consequential improvements. Energy efficiency improvements have to be carried out to the whole building, up to a value of 10% of the value of the principal works and include measures such as boiler replacement or upgrading lighting.

<sup>43</sup> The Government announced in Budget 2008 its ambition that new non-domestic buildings should be zero carbon from 2019 and seek views on the issue at the "Definition of Zero Carbon Homes and Non-Domestic Buildings: Consultation"

of the Building Regulations and a new mechanism called 'allowable solutions'<sup>44</sup>. This approach is likely to be adopted by the Government to achieve the zero carbon non-domestic buildings target. To maximise the other benefits of carbon reduction in the District, the Council expects all allowable solutions to be linked with local projects (i.e. within Bromsgrove District) that would bring local benefits before projects outside of the District, then County and Region are considered.

8.271 In Bromsgrove, the viability of meeting the Code for Sustainable Homes standard was tested in the Affordable Housing Viability Study. The study found that it is viable for affordable housing development to meet the Code Level 6 by 2013 and for market housing, it is viable to meet Code Level 4 by 2013 and Code Level 6 by 2016.

#### *Reducing surface transport emissions*

8.272 In Bromsgrove, the highest concentration of emissions is from our towns and main roads (excluding motorways)<sup>45</sup>. To reduce the need to travel and to reduce distance undertaken by car are the key elements of reducing future emissions. Any emissions arising from building new roads and facilities should also be minimised. In order to promote sustainable transport (as in BDP16), it is important that development locations are well-served by public/ sustainable transport, existing facilities and infrastructure.

#### **Waste management**

8.273 Greenhouse gases are emitted from biodegradable waste as it decomposes anaerobically in landfill. In addition, the transportation and treatment of all waste (including recycling and garden waste) consumes a significant amount of energy. In the future, warmer temperature will affect the biological processes of waste management and may lead to an increased number of vermin and pests<sup>46</sup>. To ensure waste is properly managed and to reduce the impact of waste on climate change, the Council will expect all developments to comply with the Worcestershire Waste Core Strategy (in particular Policy WCS16 New development proposed on or near to existing waste management facilities and Policy WCS17 Making provision for waste in all new development) and follow the relevant guidance, such as "Making Space for Waste: Designing Waste Management in New Developments"<sup>47</sup>. This will include the construction and design of future developments to follow the waste management hierarchy: 1) prevent, 2) preparing for reuse, 3) recycling, 4) other recovery and 5) disposal.

#### **Renewable Energy**

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<sup>44</sup> Allowable Solutions is a new concept. The developer will make a payment to an Allowable Solutions provider, who will take the responsibility and liability for ensuring that Allowable Solutions, which may be small, medium or large scale carbon-saving projects, deliver the required emissions reductions. However, Code Level 5 requires the zero carbon target to be reached on site without the use of 'Allowable Solutions'.

<sup>45</sup> Joint Climate Change Strategy for Bromsgrove and Redditch (2010-2013)

<sup>46</sup> Planning for Climate Change in Worcestershire

<sup>47</sup> <http://www.worcestershire.gov.uk/cms/pdf/CD%20%20Submission%20Document%20-%20June%202011.pdf>

8.274 The Renewable Energy Directive 2009 sets a target for the UK to achieve 15% of its energy consumption from renewable sources by 2020. The resource assessment in the Renewable Energy Capacity Study for the West Midlands (2011) reveals considerable potential for renewable energy generation from wind and micro-generation in Bromsgrove. The Worcestershire County Council Renewable Energy Study and the Planning for Renewable Energy in Worcestershire report have identified areas where renewable resources are available/ technically feasible. Compared to big cities, Bromsgrove is identified as having good solar irradiance, showing good opportunities for solar thermal/power generation. The Department of Energy and Climate Change has published a new National Heat Map, identifying locations where heat distribution is most likely to be beneficial and economical. To encourage the deployment of low-carbon electricity and heat generation to households and industrial, business and public sectors, the Government has introduced various schemes, including the Feed-in-Tariffs, Renewable Heat Premium Payments and Renewable Heat Incentive schemes by which householders and businesses will get paid for both the generated energy used on site and any surplus exported energy generated.

8.275 To contribute to the carbon reduction target, the Council will support large scale low/ zero carbon energy generation projects when adverse impacts<sup>48</sup> are addressed satisfactorily. For developments in areas where low carbon / renewable resources/ opportunities are available and technically feasible, the Council will expect the development to incorporate the relevant technologies, such as photovoltaic and district heating network. Where there is a firm plan on the delivery of a renewable/ low carbon energy generation schemes, such as wind harvesting/turbines and combined heat and power or tri-generation, developments nearby will be required to connect to these energy supplies.

### **Adaptation – Developments in hotter summers and wetter winters**

8.276 The Climate Change Act has created a framework for climate change adaptation, including the UK Climate Change Risk Assessment (2012) and the National Adaptation Programme (under-way)<sup>49</sup>. The UK Climate Change Risk Assessment identifies the key climate change risks and opportunities across all sectors and the results are presented in five themes: agriculture and forestry, business, health and well-being, buildings and infrastructure, and the natural environment.

8.277 In Worcestershire, the impacts of climate change are expected to be varied including risk of drought, flooding, subsidence and fire<sup>50</sup>. Flooding is

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<sup>48</sup> Practical issues of different low/zero carbon energy generations are available on Local Government Association website: <http://www.local.gov.uk/web/guest/compare-renewables/>

<sup>49</sup> Paragraph 94 of the NPPF requires policies and decisions to support the objectives and provisions of the Climate Change Act 2008.

<sup>50</sup> Worcestershire County Council has produced a County Strategic Alert map showing flooding, subsidence risk and outdoor fire risk for Worcestershire. The map can be found at the [Planning for](#)

already an issue in several parts of the District (which will be addressed separately in BDP23 Water Management) and climate change has the potential to make the issue worse. The Planning for Climate Resilient Infrastructure Report (2012) assesses the power, water, transport, telecommunications and emergency services infrastructure against the climate hazard data in the County and has developed risk profiles for each infrastructure sector.

8.278 To ensure future developments can adapt to or mitigate the impacts of climate change, the Council will expect development and its infrastructure to be planned to avoid increased vulnerability to the range of impacts arising from climate change. When developments and infrastructure are brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, for example by incorporating suitable design and through the planning of green infrastructure.

8.279 10% of the households in the District are not connected to the mains gas network<sup>51</sup> and these properties often have to rely on oil or solid fuel heating which can be far more expensive and have a greater carbon impact than a gas system. The more frequent extreme weather means that many developments in the rural areas of the District are at risk from the impacts of these weather events, as grid-connected electricity may be unavailable and delivery of fuel impossible during extreme weather conditions. Some of the de-centralised, off-grid zero or low carbon energy generation technologies are likely to offer a far more secure means of supply to these developments and the Council will expect installations of zero or low carbon energy for developments in these areas. This means that small scale technologies such as ground source heating, solar PV could be well suited as alternative heat sources in these locations.

### **Consultation feedback**

8.280 There were criticisms on demanding market housing to achieve the same level of Code for Sustainable Homes as affordable housing and requiring developments to provide infrastructure to connect to nearby zero/low energy scheme with firm delivery plan. Some also considered the policy repeating the national policy as there was no evidence to demonstrate local circumstances. The Affordable Housing Viability Assessment was published since DCS2 which provide evidence for requiring market housing to achieve the Code for Sustainable Homes. As developments have to provide general services, there is no reason why connecting to zero/ low- carbon scheme will affect the viability of the development.

8.281 There were suggestions to reference the impact of transport emissions in affecting carbon emissions, the potential impact of renewable energy schemes on aerodromes and link the policy with Green Infrastructure. It was also raised that the data shown in the Warmer Worcestershire flyover may not be 100% reliable down to individual building. Where relevant, amendments were made.

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[Climate Resilient Infrastructure](#) report. Maps indicating the risk of flooding can be found in the Bromsgrove & Redditch Strategic Flood Risk Assessment.

<sup>51</sup> Renewable Energy Capacity Study for the West Midlands (2011)

## **Sustainability Appraisal**

8.282 Apart from addressing the causes and potential impacts of climate change, the policy has many positive inferences upon the SA objectives, such as promoting the health and well-being of the population. However, the policy may lead to an increase in construction cost and affect the viability of development.

### **BDP 22 Climate Change**

**BDP 22.1 The Council will deliver viable low carbon climate resilient developments through:**

- a. Encouraging development in existing buildings to achieve consequential energy efficiency improvements**
- b. Requiring allowable solutions to be linked with projects within the District in the first instance, followed by the County and then Region**
- c. Ensuring developments and infrastructure are planned to avoid increased vulnerability to the range of impacts and take advantage of the opportunities arising from climate change, having regard to the intended lifetime of the development. Where developments and infrastructure are brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures,**
- d. Ensuring developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure.**
- e. Ensuring the construction and design of developments as well as future occupants of the developments will follow the energy, waste management hierarchies and other relevant guidance. Where relevant, developments must comply with the Worcestershire Waste Core Strategy.**
- f. Supporting developments to incorporate zero or low carbon energy generation technologies, especially installations that improve the energy security of developments in the rural areas. Where there is a firm delivery plan of zero or low carbon energy generation scheme, developments nearby are expected to provide infrastructure/ to connect to the zero/ low-carbon energy scheme.**
- g. Supporting zero or low carbon energy generation schemes when adverse impacts are addressed satisfactorily.**

### **BDP 23 Water Management**

8.283 The Water Framework Directive was enacted into UK law in 2003 and established a legal framework for the protection, improvement and sustainable use of water bodies such as rivers, brooks and groundwater. It requires all water bodies to achieve 'good' status by 2015<sup>52</sup> and aims to prevent deterioration in water body status, reduce water pollution, conserve aquatic ecosystems and habitats, reduce the effects of floods and droughts on water bodies and promote sustainable use of water as a natural resource.

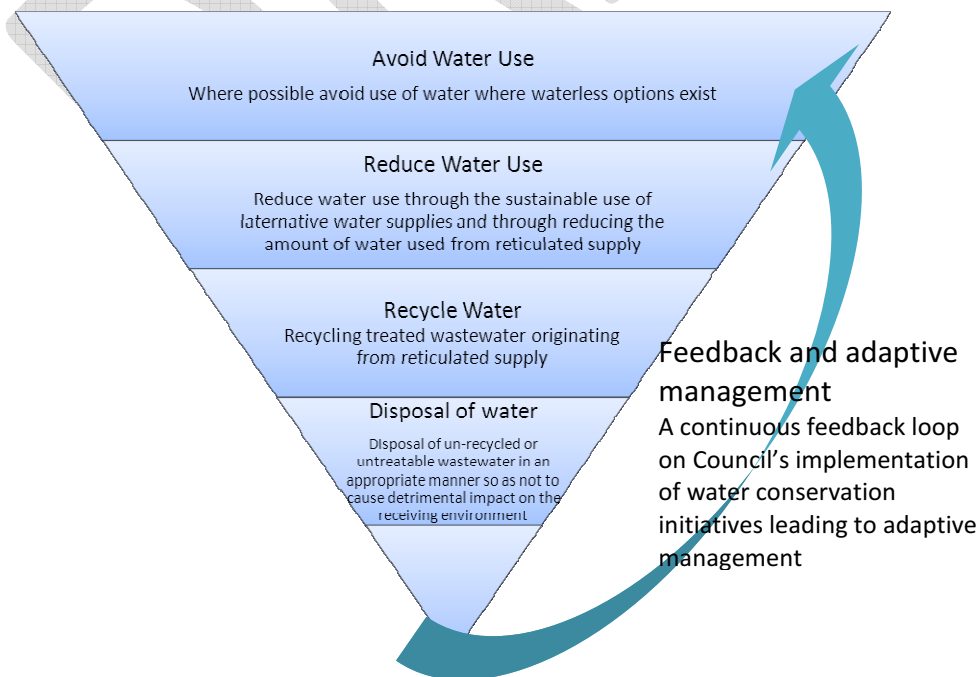
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<sup>52</sup> Or later dates of 2021 or 2027 subject to criteria set out in the Directive

### Water demand

8.284 Bromsgrove falls within the Severn River Basin District and assessment of the main water resources in the River Basin Management Plan indicates that the main aquifers have poor quantitative status and no change in status is forecast for by 2015. The existing abstraction has also led to negative environmental impacts in several areas in the District (such as the Hewell Grange SSSI and the Battlefield Brook) which could further impact on Severn Trent Water's projected baseline negative balances of supply. The climate change projections (UKCP09) also indicate that by 2080s, there will be a projected change in average summer rainfall volumes ranging from a decrease of about 60% to an increase of about 10%.

8.285 To help address the likely future shortfalls of water resources, the Council will require the design and maintenance of developments to follow the water conservation hierarchy – avoid, reduce, recycle and disposal.





8.286 In terms of residential development, the Environment Agency Report<sup>53</sup> states that getting existing homes retrofitted could reduce/ delay the need for new resource developments. It is tested in the Affordable Housing Viability Assessment that all market housing in the District can achieve Level 4<sup>54</sup> of the Code for Sustainable Homes by 2013 and Level 6<sup>55</sup> by 2016 and that affordable housing can achieve Code Level 6 from 2013 onwards.

8.287 For non-residential development, as recommended by the Environment Agency, new development should seek to meet the highest level of water efficiency measures to achieve BREEAM certification for new office buildings and a minimum of 25% water savings for any other development<sup>56</sup>.

### Flood Risk

8.288 Flooding in the District results from a range of mechanisms (acting in combination or isolation), including fluvial, sewer and surface water sources, as well as blockages of hydraulic structures. Key flooding issues in the District include widespread and rapid onset of surface water and sewer flooding, flash flooding from ordinary watercourses, a history of flooding in Belbroughton due to badly maintained watercourses and from the canal; and surface water flooding due to land management practices, farming intensity and soil compaction.

### *Risk management approach*

8.289 To ensure flood risk is minimised, the Council expects all developments to take account of flood risk from all sources<sup>57</sup> (which should also include the impact of climate change) and follow the flood risk management hierarchy<sup>58</sup> in PPS25 Development and Flood Risk Practice Guide, that is: 1) Assess; 2) Avoid; 3) Substitute; 4) Control; 5) Mitigate, when planning and designing development.

8.290 The most appropriate flood alleviation measures vary depending on the source(s) of flooding. For example, some risks can be minimised by designing in flood storage, infrastructure upgrades and some simply through regular maintenance. Generally speaking, the Council expects development to set aside appropriate land to accommodate SuDS (which should follow the SuDS management train concept and be designed in accordance with national guidance) and improve the river environment by adopting measures that work with the natural processes. This includes maximising opportunities for restoring watercourses, deculverting, delivering multiple benefits in line with BDP24

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<sup>53</sup> Environment Agency (2007) West Midlands Regional Spatial Strategy (RSS11) The Impact of Housing Growth on Public Water Supplies.

<sup>54</sup> This Code Level is equivalent to per capita internal consumption of 105 litres of water usage per person per day ( $\leq 105$  l/p/day)

<sup>55</sup> This Code Level is equivalent to per capita internal consumption of 80 litres of water usage per person per day ( $\leq 80$  l/p/day)

<sup>56</sup> Page 5-28 of the Outline Water Cycle Study

<sup>57</sup> Sources of flood risk normally include main river, ordinary watercourses, surface water run-off, inadequate drainage systems, sewer networks, groundwater and flooding from manmade structures such as canals and reservoirs

<sup>58</sup> Refer to Figure 2.1 of PPS25 Practice Guide for a brief summary of the hierarchy



Green Infrastructure and ensuring that an appropriate buffer zone<sup>59</sup> is provided between the watercourse and any development.

8.291 Under the Floods and Water Management Act (2010), Worcestershire County Council is the Lead Local Flood Authority<sup>60</sup> for Worcestershire and will become or appoint a SuDS Approval Body when Schedule 3 of the Act is commenced. The County Council is currently developing the Local Flood Risk Management Strategy and development proposals should have regard to the ambitions of the Worcestershire Local Flood Risk Management Strategy when designing developments.

### Water Quality

8.292 Watercourses receiving water from the STWs that serve the District includes River Arrow, Hoo Brook, Sugar Brook, River Tame, River Stour and Hen Brook. With the exception of River Tame which is only assessed for its dissolved oxygen, all watercourses fail to meet at least one of the Water Framework Directive (WFD) objectives and standards<sup>61</sup>. The poor quality is suspected to be due to a combination of point source inputs (that is sewage discharges) and diffuse inputs (that is urban run-off, agricultural and land use management). The Council has a duty under the WFD to take into account the River Basin Management Plan and help deliver the WFD objectives.

8.293 In Bromsgrove, runoff water that is transmitted in the surface water sewer will be discharged straight into ditches and rivers. To improve the quality of watercourses in the District, the Council expects all developments to follow the SuDS management train concept as set out in the flood risk management section. Due to the geology of the District (several sites are located upon clays and silts) and the fact that several areas fall within the Source Protection Zones<sup>62</sup>, careful considerations are required when designing drainage strategies as some SuDS methods such as infiltration techniques which rely upon the permeability of the substrata may not be feasible in the District.

8.294 In rural areas, waste water is normally treated/ collected by package treatment plants, septic tanks or cesspools. Non-mains foul drainage that is poorly sited or badly maintained are affecting the quality of watercourses. The Council expects developments that are not connected to the combined or foul sewer networks to follow the foul drainage hierarchy (package treatment plant first, then septic tanks and cesspools last) and demonstrate proper and effective management are provided for.

### Waste Water

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<sup>59</sup> A minimum of 8 metre of public space is normally required but it could be more if it helps deliver multiple benefits of Green Infrastructure.

<sup>60</sup> The Lead Local Flood Authority is now also the consenting authority for ordinary watercourses and this function has been delegated to North Worcestershire Water Management Team.

<sup>61</sup> Table 7-5 to Table 7-10 use a simple traffic light system to show whether the receiving water immediately downstream of the STW complied with its WFD objectives and standards for the period 2006-08 for which the Environment Agency have provided their assessment.

<sup>62</sup> Figure 14 of Level 1 SFRA shows the map of the Source Protection Zones Affecting Potential Development within the District

8.295 In urban areas, waste water that is transmitted in the combined<sup>63</sup> or foul sewer networks will be cleansed in a Sewage Treatment Work (STW) before being released back into the river network. The hydraulic capacity<sup>64</sup> and treatment capacity<sup>65</sup> of a STW together determine the amount of additional flows a STW can treat. The Outline Water Cycle Study indicates that Bromsgrove (Fringe Green) STW current hydraulic capacity only exists for about 50% of the increase in flow predicted from the planned development<sup>66</sup>. In terms of treatment capacity, although most STWs<sup>67</sup> have been identified as having very limited treatment capacity, Severn Trent Water Limited (STWL) indicates that none has any land or other constraints preventing expansion. As the application for a revised consent (i.e. hydraulic capacity) from the Environment Agency can take up to three years and it takes time to expand the STWs (i.e. treatment capacity), to avoid any delay of development, applicants are expected to contact STWL as early as possible<sup>68</sup>.

8.296 In view of the capacity limitations of the STWs serving the District and given that the sewerage undertaker has an obligation to provide treatment capacity for future domestic development under the Water Industry Act 1991, the Council expects all major developments to work with STWL and demonstrate that sufficient hydraulic and treatment capacity is available to accommodate the development. Where STWL agrees, phasing of development in line with the necessary treatment capacity upgrade may consider acceptable.

### **Consultation Feedback**

8.297 There was support for the policy as well as some suggestions for stronger policy wordings and to include more details in the justifications and policy such as identifying areas by types of flooding, referring woodlands as a water risk management tool, easements adjacent to watercourses, referring to the foul drainage hierarchy and cross-referencing to issues that were addressed in other policies. Suggestions are accommodated where appropriate, except cross-referencing and issues that are dealt with in other policies. As flood maps for watercourse flooding, surface water run-off and sewer flooding are included in the evidence document, it is not considered necessary to refer to the areas in the justifications.

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<sup>63</sup> Combined sewer system is the waste water system that transmits both foul and surface water, hence all water will be treated in the sewage treatment works (STW).

<sup>64</sup> This is determined by the current consented flow permitted by the Environment Agency in order to maintain compliance with the Water Framework Directive objectives

<sup>65</sup> This is determined by the existing tank sizes and aeration capacity of the STW to treat incoming load to the required standard

<sup>66</sup> This is based on the per capita wastewater flow rate of 160l/h/d and occupancy rate of 2.4/dwelling and are consistent with the figures used by STWL.

<sup>67</sup> Belbroughton STW is identified as having the most seriously restricted treatment capacity and Alvechurch STW, Bromsgrove (Fringe Green) STW and Stoke Prior STW are identified as having reasonable spare capacity. Though Minworth STW and Roundhill STW are identified as having substantial spare capacity, it is expected that there are many demands from other developments in the greater Birmingham area.

<sup>68</sup> Please note that Severn Trent Water Limited will need the certainty of development before additional capacity is provided.

8.298 Some considered water efficiency is already addressed in Building Regulations and questioned the viability of achieving the water standard in the Code for Sustainable Homes and BREEAM. The Affordable Housing Viability Assessment was published since the last consultation which provides evidence for the required standard in the Code for Sustainable Homes.

8.299 Concerns were raised on the sewage treatment capacity. Severn Trent Water has a legal obligation to initiate funding when new development is certain. The policy now states that on all major developments engagement with Severn Trent Water should take place at the earliest opportunity to agree on their foul drainage plans.

8.300 There were also a few comments that listed out the flooding issues in local areas, comments were forwarded to North Worcestershire Water Management team accordingly.

### **Sustainability Appraisal**

8.301 The policy seeks to reduce the impacts of new development on the environment, the running costs of buildings, the causes of climate change and the potential loss and disruptions to occupants and owners. However, the policy may lead to increase in construction costs and affect the viability of development.

### **BDP23 Water Management**

**BDC23.1 The Council will deliver safe developments with low environmental impact through:**

- a. **Supporting developments that take into account of the Severn River Basin Management Plan and contribute to delivering the Water Framework Directive objectives.**
- b. **Supporting developments that follow the water conservation hierarchy. All market housing developments should achieve at least the water category of the Code for Sustainable Homes Level 4 by 2013 and Level 6 after 2016. Affordable housing should at least achieve the water category of Code Level 6 from 2013 onwards. Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development.**
- c. **Ensuring development addresses flood risk from all sources, follow the flood risk management hierarchy when planning and designing development, and do not increase the risk of flooding elsewhere. Where inappropriate developments in areas at risk of flooding are necessary after the sequential test is applied, appropriate designs, materials and escape routes that minimise the risk(s) and loss should be incorporated.**
- d. **Requiring all developments to work with the Lead Local Flood Authority and SuDS Approval Body and pay necessary regard to the Local Flood Risk Management Strategy and its evidence.**

- e. **Requiring all major developments to engage with Severn Trent Water at the earliest opportunity to ensure that sufficient capacity of the sewerage system (i.e. wastewater collection and treatment) is available to accommodate the development.**
- f. **Supporting developments that protect and enhance water quality. This includes ensuring the phasing of development is in line with the completion of the required infrastructure and non-mains drainage will follow the foul drainage hierarchy with appropriate management plans in place.**
- g. **Requiring developments to set aside land for Sustainable Drainage Systems (SuDS) and follow the SuDS management train concept. This includes maximising opportunities for restoring watercourses, deculverting, delivering multiple benefits in line with BDC24 Green Infrastructure and ensuring that an appropriate buffer zone is provided between the watercourse and any development.**

### **BDP24 Green Infrastructure**

8.302 Green Infrastructure is the planned and managed network of green spaces and natural elements that intersperse and connect our cities, towns and villages. It is contributed to by many different elements including biodiversity, the landscape, the historic environment, the water environment, public access to green spaces and informal recreation sites. Green Infrastructure may also be seen as part of the life-support system of an area, providing multiple functions and environmental services to a community such as strengthen the economy, support green economy, attract investment, improve health and wellbeing, contribute to tourism and visitor economy, contribute to flood alleviation and water management, improve the community's experience of natural and historic places, and enhance the natural economy.

8.303 Green Infrastructure is therefore a holistic approach to viewing and managing the natural environment, acknowledging the multiple benefits and vital services it provides and making tangible links to economic, health and social welfare agendas and aspirations. For this reason, the Council will expect development to consider policies BDP16 Sustainable Transport, BDP20 Managing the Historic Environment, BDP17 Natural Environment, BDP19 Climate Change, BDP23 Water Management, BDP25 Health and Well Being together to ensure developments deliver multiple benefits in accordance to priorities determined by local circumstances, improve connectivity, enhance the quality of and provide for the appropriate long term management of Green Infrastructure. The District's Green Infrastructure assets are outlined in the Green Infrastructure Baseline Report.

8.304 The Worcestershire Green Infrastructure Framework documents form the basis for the development of the emerging Worcestershire Green Infrastructure Strategy which will create a comprehensive policy framework for the protection, creation, enhancement and accessibility of Green Infrastructure in the County. At the local level, Concept Plans which set out and prioritise the respective Green Infrastructure requirements for an individual site. The work is still on-going and so far, the work shows that:

- 30 Environmental Character Areas<sup>69</sup> are identified in Worcestershire, with 7 of them<sup>70</sup> fall within the District. Overarching objective and guiding principles in biodiversity, historic environment, landscape character, blue infrastructure, access and recreation and transport are available for each character area. Together the areas aim to achieve a network of strategic and local biodiversity and human movement corridors.
- To meet the sub-regional access and recreation needs of the proposed new housing growth in Worcestershire, recommendations on existing assets are made, which include the Lickey Hills, the canal to Worcester and Waseley Hills Country Park.
- A Green Infrastructure Concept Plan has been produced for the Bromsgrove Town Expansion Site BROM2 Perryfields Road.

8.305 To ensure developments can enjoy the benefits of the local, sub-regional and wider Green Infrastructure network, the Council will expect development to have regard to and contribute towards the emerging Worcestershire Green Infrastructure Strategy and any local GI Strategy which may be prepared. All major development should explain how the design of development achieves the multiple benefits of Green Infrastructure and contribute towards the wider network.

### **Consultation Feedback**

8.306 There was support for the policy although there were doubts in singling out forestry/ woodland from other Green Infrastructure assets in the policy. It was unclear then whether the Worcestershire Green Infrastructure Framework will take into account the Delivery Plan of the West Midlands Forestry Framework and given the multiple benefits of trees, it was considered appropriate to include tree planting in the policy. However, it is now confirmed that the Worcestershire Green Infrastructure Framework will also incorporate the Delivery Plan of the West Midlands Forestry Framework as well as the Woodland Access Standard, so the details about tree planting in the previous version is now taken out.

8.307 It was suggested that supporting maps illustrating the locations of different Green Infrastructure assets should be incorporated. Given that the maps are already included in the evidence base documents and referred to in the policy, it is considered sufficient.

### **Sustainability Appraisal**

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<sup>69</sup> The quality of data will change over time as new surveys are undertaken, therefore the Environmental Character Areas will be subject to change as more detailed/ updated data become available.

<sup>70</sup> The seven Environmental Character Areas that fall within the District are: (2) Severn Valley North; (3) North Worcestershire Hills; (4) Forest of Feckenham and Feckenham Wetlands; (10) Hagley Hinterland; (11) Hollywood & Wythall; (12) Bromsgrove- Redditch Corridor; (13) Mid-Worcestershire Corridor

8.308 The Policy was assessed within the Sustainability Appraisal and performs strongly against many of the environmental and social objectives and in some cases, brings in economic benefits (e.g. eco-tourism). But safeguarding all Green Infrastructure assets may be costly and even unviable in some cases.

#### **BDP24 Green Infrastructure**

**BDP24.1 The Council will deliver a high quality multi-functional Green Infrastructure network by:**

- a. Ensuring developments adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure, with priorities determined by local circumstances**
- b. Requiring development to improve connectivity and enhance the quality of Green Infrastructure.**
- c. Requiring development to provide for the appropriate long term management of Green Infrastructure.**
- d. Requiring development to have regard to and contribute towards, the emerging Worcestershire Green Infrastructure Strategy, any local GI Strategy and where available, the GI Concept Plans. For large scale development, developers will need to prepare a Concept Plan for the area, which would then serve to inform all developments in that area as they come forward.**

#### **BDP25 Health and Well Being**

8.309 Ensuring the District's communities have good health and well-being is a major priority for Bromsgrove. It is essential that policies are put in place that tackle the underlying causes of health problems in the District, and facilitate the provision of healthy lifestyles and healthy environments. Planning plays an important role in sustaining and promoting the health and well-being of communities. It is the responsibility of planners, developers and policy makers to ensure that our communities have access to homes, environments and amenities that will enable them to lead healthy and productive lives. The NPPF (pg.7) states that the social role of 'sustainable development' comprises *"supporting strong, vibrant and healthy communities, by creating a high quality built environment, with accessible local services that reflect the community's needs and support health, social and cultural well-being"*.

8.310 The determinants of health are closely linked to quality of life factors. This includes the ability to earn a reasonable wage locally, access to healthy housing, open space, an active lifestyle, cultural and community facilities, healthy food, care and health facilities and adhering to the principles of equality and fairness. These factors clearly cut across a number of planning and development topics and are therefore addressed by a variety of policies and interventions throughout the District Plan. This includes the provision of appropriate housing, access to quality local services, including green infrastructure and active recreation, healthy transport choices, such as cycling and walking, and good place making. To avoid repetition, this policy looks specifically at promoting healthy lifestyles and ensuring that development does

not have a negative impact on the health or wellbeing of people or communities.

8.311 One of the important components of health and well-being is the open space, sport and recreation facilities that are integral to both urban and rural communities. The provision of high quality, accessible open space, sport and recreation facilities in the right areas can have significant benefits in relation to health, community cohesion and general well-being. The Council will therefore protect all the existing facilities of this nature from development, except those in areas with an oversupply or where the need or benefits of the development clearly outweigh the loss. Where proposed development would result in the loss of a facility or area of open space, the policy requires appropriate compensation for the loss. All housing developments are expected to contribute to the delivery of these amenities in accordance with the provision standards identified in the Open Space, Sport and Recreation Facilities Assessment (2010).

8.312 Planning for integrated and multi-functional public services, including health facilities, in accessible locations also has a direct positive effect on the health of local people by enabling them to access a range of services. Accessible leisure and community facilities play an important role in ensuring local people have the opportunity to lead active lifestyles and participate in community activities, which can have positive outcomes for mental health and social cohesion.

8.313 The health of the people of Bromsgrove District is generally better than the England average according to the 2011 Annual Health Profile for Bromsgrove produced by the Association of Public Health Observatories. The various partners associated with the Worcestershire Health and Well Being Board are key to aiding Bromsgrove's health and well-being, but the District Council can make a contribution by improving people's lifestyles through supporting community sports organisations and through direct leisure provision (e.g. the Dolphin Centre).

8.314 In line with policies BDP12 Sustainable Communities and BDP16 Sustainable Transport, one of the overarching contributors to sustainable development is the need to ensure that development is located so that people are close to a range of services and facilities, thereby reducing the need to travel. In addition to the implications of reducing travel on air quality/climate change, there are benefits to the health and well-being of local residents through increased opportunities to walk or cycle, which helps to increase levels of physical exercise and social interaction; this in turn has positive impacts on physical and mental health. Ensuring that a mix of uses is provided in new developments, and that efficient use is made of land, also contributes to reducing the need to travel and to promoting sustainable development.

8.315 Reducing the over-concentration of uses that have a negative impact on the health of local people in identified locations provides a flexible long-term opportunity to address issues as they arise in a spatial manner. One of the challenges that the UK faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the

prevalence of fast food restaurants and takeaways in some communities. Both Government papers; 'Healthy Weight, Healthy Lives' (2008) and 'Healthy Lives, Healthy People' (2011) highlight the need for local authorities to use the planning system to control more carefully the number and location of hot food takeaways as a means of combating their adverse effects on community health. The Government will promote these powers to local authorities to highlight the impact that they can have on promoting healthy weight, for instance through managing the proliferation of fast food outlets, particularly in proximity to parks and schools.

8.316 Research conducted by the Nutrition Policy Unit of London Metropolitan University (2008) indicated that food outlets in close proximity to and surrounding schools were a hindrance to secondary school pupils eating in a healthy manner, as portions were not only relatively small, but relatively cheap. The report concluded that hot food takeaways within walking distance of schools are a contributing factor to increased levels of childhood obesity.

8.317 Further research in 2009 showed that primary schools are also affected by these establishments. Although pupils in primary education rarely leave school premises during the day, the research indicated that food was purchased after school. The Council believe the inclusion of first and middle schools as part of this policy is crucial since not all pupils will be accompanied home by adult and it will also support parents accompanying their children home to make healthier choices. A 400m restriction buffer is considered to be a reasonable distance given that it broadly represents a 10 minute walk, taking into account physical barriers on any route.

8.318 There is a growing recognition that takeaways are increasing the local retail food offer in the District. This displaces other shops and food options, limiting the choice and access to healthy, fresh food which in turn impacts on the health of communities in the District. Access to healthy food is shown to improve general health and lessen poor health conditions; additionally, the production of local foods can also help improve both physical health, through elevating levels of exercise, and mental health.

### **Consultation Feedback**

8.319 There was support for healthier lifestyles, but there were numerous responses requiring more to be done on improving health and well-being, in particular the over-concentration of A5 uses and the use of allotments. The policy has been updated accordingly to include these topics, with more emphasis applied to the restriction of A5 uses. A considerable amount of support was given to the references regarding walking and cycling.

8.320 Sport England was concerned at the lack of reference to sport, with word changes made accordingly. Two responses felt the policy should have a more emphasis on green infrastructure, however, the Council believe this topic is addressed adequately in BDP24 Green Infrastructure.

### **Sustainability Appraisal**



8.321 The policy was assessed within the Sustainability Appraisal, with high scores in both the social and environmental attributes, and there are no known weaknesses. The retention and enhancement of open space for recreation and amenity and the resulting improved living environment helps improve the health and well-being of the population. The environmental benefits of maintaining or enhancing open space are wide reaching. Whilst some recreational areas, such as sports pitches, have little biodiversity value, well designed parks and gardens can contribute greatly to conserving and enhancing ecological diversity through habitat provision and maintenance or creation of wildlife corridors.

8.322 Open space can also be beneficial in terms of preserving landscape and townscape, which is particularly important in terms of preserving the historic setting of heritage features or conservation areas. The policy also has potential to minimise flood risk through maintaining areas of undeveloped green space that will enable precipitation to infiltrate the soil and reduce run-off.

8.323 The provision of high-quality walking and cycling routes will also contribute to the health and well-being of the population. The policy also goes further by promoting partnership working to explore new ways to improve opportunities for healthy and active lifestyles. Reducing the over-concentration of hot food takeaways actively assist in the health and well-being of communities. The promotion and support of local food growing initiatives is not only sustainable, but encourages healthy food options.

## **BDP25 Health and Well-Being**

**BDP25.1 Bromsgrove District Council will support proposals and activities that protect, retain or enhance existing sport, recreational and amenity assets, lead to the provision of additional assets, or improve access to facilities, particularly by non-car modes of transport. This will include maintaining greater access to and enjoyment of the countryside. The Council will ensure all new residential developments meet and contribute towards the qualitative, quantitative and accessibility standards set for the open space, sport and recreation facilities in the District (as follows):**

<b>Typology</b>	<b>Quantity Standard (hectare per 1000 population)</b>	<b>Accessibility Standard (travelling time to the facility)</b>
<b>Parks and gardens</b>	<b>0.26</b>	<b>Walk: 15 minutes (720m) Drive: 15 minutes</b>
<b>Natural and Semi Natural Open Space</b>	<b>0.44</b>	<b>Walk: 15 minutes</b>
<b>Amenity Green Space</b>	<b>0.42</b>	<b>Walk: 10 minutes (480m)</b>
<b>Provision for</b>	<b>0.027</b>	<b>Walk: 10 minutes</b>

<b>Children</b>		
<b>Provision for Young People</b>	<b>0.03</b>	<b>Walk: 15 minutes</b>
<b>Outdoor Sports Facilities</b>	<b>1.67</b>	<b>Walk: 10 minutes (grass pitches)</b> <b>Drive:</b> <ul style="list-style-type: none"> <li>▪ <b>15 minutes (tennis courts/ bowling greens)</b></li> <li>▪ <b>20 minutes (synthetic pitches, golf courses and athletics tracks)</b></li> </ul>
<b>Allotments</b>	<b>0.19</b>	<b>Walk: 20 minutes (960m)</b>

**BDP25.2** It will be impractical and inappropriate to deliver all the open space typologies on every site as the quality of sites varies and enhancement will be based on the conditions of the relevant facilities at the time. Where provision standards are not available, contributions will be negotiated in accordance with the recommendations in the Open Space, Sport and Recreation Assessment Study and the requirements at the time.

**BDP25.3** The Council will not permit the loss or displacement of existing indoor and outdoor open space, sport and recreation facilities (including both designated and undesignated areas on the Policies Map) to other uses unless it can be demonstrated through up-to-date and robust evidence that:

- a) There is a proven surplus of provision and the site is no longer needed, or is unlikely to be required in the future; or
- b) The benefit of the development to the community outweighs the harm caused by the loss of the facility; or
- c) An alternative facility of an equal quantity and quality or higher standard will be provided in at least an equally convenient and accessible location to serve the same local community

**BDP25.4** In such circumstances, the Council will require appropriate compensatory measures for the loss in the form of equivalent or improved facilities and/or financial contributions from developers.

**BDP25.5** The Council will support opportunities for healthy and active lifestyles through:

- i) Working with partners of the Worcestershire Health and Well-Being Board to explore new ways to improve opportunities for healthy and active lifestyles
- ii) Providing high-quality walking and cycling routes
- iii) Providing excellent access to sport, leisure and recreation facilities

- iv) **Promoting and supporting initiatives for local food-growing, such as allotments, as well as urban agriculture.**

**BDP25.6 Concentrations of A5 hot food takeaway uses in particular can be detrimental to the health of communities in the District. Proposals for hot food takeaways (Class A5) will only be permitted where:**

- a) **The proposed use will not result in the proportion of units within the designated centre or frontage being hot food takeaways exceeding 5% (updated figures for each local centre will be published annually within the Council's AMR)**
- b) **The proposed use will not result in more than two A5 units located adjacent to each other**
- c) **The proposed use will maintain at least two non A5 units between individual and/or groups of hot food takeaways.**

**BDP25.7 With regard to proposals which fall outside the designated town centre or local centres (in line with the boundaries established in BDP17 and BDP18), planning permission for hot food takeaways will be resisted where proposals:**

- i) **Fall within 400m of the of the boundary of a first, middle or high school**
- ii) **Fall within 400m of a park or youth centred facility.**

## **9 Implementation and Monitoring**

9.1 The preparation of any plan should not be seen in isolation nor as a once and for all activity. It is vital that the plan is checked at various stages to establish whether it is being implemented correctly, to make an assessment of outcomes and to check if these outcomes remain as intended and are still relevant. The BDP will ultimately be one of several policy documents where changes will be needed to ensure that local policy remains consistent with national and local changes.

9.2 The new planning system places greater emphasis on the importance of continual plan review. In order to make the planning system more responsive to changing circumstances, components of the LDF have been separated so that each document can be reviewed and updated independently.

9.3 A key component of this process is the Annual Monitoring Review (AMR) which is prepared at the end of December every year and reflects activity in the previous financial year. It looks at how policies are working in practice; how policies are being implemented; how plans affect socio-economic indicators and how the work programme is progressing. Other regular monitoring which takes place is the housing and employment land availability studies and the Town Centre Health Check.

9.4 Therefore in order to deliver the BDP it is important that clear monitoring indicators are identified, which it is acknowledged are likely to evolve over time in

order to be responsive to changing circumstances. Monitoring provides information on the performance of policy, the delivery of development and impacts on the environment. It is therefore important that the plan can be easily monitored and that this process is aligned with the way we assess the sustainability of the Plan. We are therefore intending to use the key indicators from the Sustainability Appraisal process to form the basis of monitoring.

9.5 The Implementation of the policies contained in the BDP will require concerted and active participation, commitment and contribution action by a range of public, private and voluntary sector bodies working in partnership. The Council has neither the powers nor the resources to implement the BDP alone. Work has progressed, sometimes at a sub-regional level, to analyse and plan for future changes in the District. This has involved gathering baseline data to realistically plan and cater for the future needs of the District and undertaking discussions with service providers, other Local Planning Authorities and government agencies.

9.6 Such joint working at this sub-regional level ensures that administrative boundaries do not obstruct strategic planning objectives, which a consistent approach is maintained and Duty to Cooperate requirements is demonstrated. The infrastructure required to deliver the BDP is contained in a separate evidence document called the Infrastructure Delivery Plan. This document will include details of existing infrastructure provision; what new provision is required to deliver the Plan; when it will be delivered; how much it will cost; who will deliver and pay for it. Due to changing circumstances and the differing timescales of different stakeholders the IDP is a 'live' document meaning that it will be capable of being updated as necessary to ensure that it is relevant and up to date.

9.7 The support of the private sector, whether as an agency for development or in the provision of services in the local community, will be important and the Council will maintain close engagement with them in the coming years, for example through forums such as the Local Strategic Partnership and the Local Enterprise Partnership. Central to this approach is the need to ensure the involvement of the wider community, whether those who live, or work in the District. The Council will continue to engage the local community seeking to build on their capacity to engage and influence change to ensure the new plans deliver sustainable development and reflect the kind of District residents want to live in.

# APPENDICES

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## APPENDIX I

### BDP POLICY 'AT A GLANCE'

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
BDP1 Sustainable Development Principles	The policy sets out the presumption in favour of sustainable development and identifies specific principles to ensure that developments are sustainable and can integrate into the locality without undue harm.	SO2, SO5, SO6, SO7 and SO8	Policy compatible with paragraphs 14, 19, 35, 58, 100, 109, 123 and 128 of the NPPF.	Worcestershire Landscape Character Assessment, Worcestershire County Council Historic Environment Assessment for Bromsgrove District Council, Worcestershire County Council The Green Infrastructure Baseline Report, Bromsgrove District Council Draft Climate Change Strategy for Bromsgrove and Redditch, Bromsgrove District Council and Redditch Borough Council
BDP2 Settlement Hierarchy	Sets out a hierarchy of settlements in the Bromsgrove District and defines suitable development appropriate by type of settlement.	SO1, SO2, SO3 and SO6	Policy compatible with following paragraphs of NPPF Para 23, 37, 38, 55 and 79.	Settlement Hierarchy Background Paper September 2012
BDP 3 Future Housing and	The policy sets out development targets	SO1, SO2, SO3 and SO5	Policy compatible with paragraphs 18,	Strategic Housing Land Availability Assessment, Bromsgrove District

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
Employment Development	for housing and employment in Bromsgrove District up to 2030 and emphasises the importance of maintaining a 5 year land supply. The policy also identifies the need for a Green Belt Review to be undertaken to identify land for housing beyond 2023. The amount of land required to deliver Redditch related growth is also provided		47, 50 and 158-161 of the NPPF.	Council Worcestershire Strategic Housing Market Assessment 2012, GVA Employment Land Review 2012, Drivers Jonas Deloitte Panel Report into the Phase 2 Revision of the West Midlands Regional Spatial Strategy (RSS)
BDP 4 Green Belt	The policy outlines the issues that will be addressed and approach that will be adopted in the Green Belt boundaries	SO8	Policy Compatible with paragraphs 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91 and 92 of the NPPF.	Worcestershire Strategic Housing Market Assessment 2012, GVA Employment Land Review 2012, Drivers Jonas Deloitte

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
	revision. The policy also seeks to protect the Green Belt in Bromsgrove District and sets out the type of development which would be appropriate.			
BDP5A Bromsgrove Town Expansion Sites Policy	The policy identifies the sites around Bromsgrove Town that will accommodate a significant proportion of growth and sets out guidance for the development of the sites.	SO1, SO2, SO4, SO5, SO6, SO7, SO8, SO9 and SO11	Policy compatible with paragraphs 17, 47, 50, 55, 80, 100 and 109 of the NPPF.	<p>Ecological Evidence for Strategic Sites Allocation, Bromsgrove District Council and Worcestershire Wildlife Trust</p> <p>Geological Evidence for Strategic Sites Allocation, Earth Heritage Trust</p> <p>Development Options in Bromsgrove District, Bromsgrove District Council</p> <p>Sustainability Appraisal of Strategic Site Options, Bromsgrove District Council</p> <p>Visual Appraisal for Strategic Site Options, Bromsgrove District Council</p> <p>Analysis of Proposed Strategic Sites, Bromsgrove District Council</p> <p>Level 2 Strategic Flood Risk Assessment, MWH</p> <p>Water Cycle Study, MWH</p>



Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				<p>Strategic Housing Land Availability Assessment, Bromsgrove District Council</p> <p>Worcestershire Strategic Housing Market Assessment 2012, GVA</p> <p>Employment Land Review 2012, Drivers Jonas Deloitte</p> <p>Affordable Housing Viability Study, Level</p> <p>Perryfields Green Infrastructure Concept Plan, Worcestershire County Council</p> <p>Transport Modelling, Halcrow and Worcestershire County Council</p>
BDP5B Other Development Sites Policy	The policy identifies the sites that will accommodate a significant proportion of growth and sets out guidance for the development of the sites.	SO1, SO2, SO4, SO5, SO6, SO7, SO8, SO9, and SO11	Policy Compatible with paragraphs 17, 47, 50, 55, 80, 100 and 109.	<p>Ecological Evidence for Strategic Sites Allocation, Bromsgrove District Council and Worcestershire Wildlife Trust</p> <p>Geological Evidence for Strategic Sites Allocation, Earth Heritage Trust</p> <p>Development Options in Bromsgrove District, Bromsgrove District Council</p> <p>Sustainability Appraisal of Strategic Site Options, Bromsgrove District</p>

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				<p>Council</p> <p>Visual Appraisal for Strategic Site Options, Bromsgrove District Council</p> <p>Analysis of Proposed Strategic Sites, Bromsgrove District Council</p> <p>Level 2 Strategic Flood Risk Assessment, MWH</p> <p>Water Cycle Study, MWH</p> <p>Strategic Housing Land Availability Assessment, Bromsgrove District Council</p> <p>Worcestershire Strategic Housing Market Assessment 2012, GVA</p> <p>Employment Land Review 2012, Drivers Jonas Deloitte</p> <p>Affordable Housing Viability Study, Level</p> <p>Transport Modelling, Halcrow and Worcestershire County Council</p>
BCBD1 Redditch Cross Boundary Development	The policy identifies the sites on the edge of Redditch that will accommodate housing and the associated	SO2, SO4, SO5, SO6, SO7, SO9 and SO11	Policy compatible with paragraphs 17, 47, 50, 55, 82, 85 100, 109 and 178-	Housing Growth Development Study, Redditch Borough Council and Bromsgrove District Council Sustainability Appraisal of Housing

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
	infrastructure to meet the growth needs of Redditch and sets out guidance for the development of these sites.		181 of the NPPF.	Growth Development Study, Redditch Borough Council and Bromsgrove District Council Worcestershire Strategic Housing Market Assessment 2012, GVA Strategic Housing Land Availability Assessment, Redditch Borough Council Affordable Housing Viability Study, Level Hewell Grange Estate-Setting of Heritage Assets Assessment 2013 (BDC)
BDP6 Infrastructure Contributions	Policy seeks to secure developer contributions towards different types of infrastructure provision.	SO1, SO2, SO3, SO4, SO6, SO7, SO8, SO9, SO11 and SO12	Policy compatible with paragraphs 173-177 of the NPPF.	Community Infrastructure Levy Regulations 2010 (+ amendments)
BDP 7 Housing Mix and Density	Sets out the house sizes most needed in the District and the density requirements.	SO4 and SO6	Policy compatible with paragraphs 17, 47 and 50 of the NPPF.	Strategic Housing Land Availability Assessment, Bromsgrove District Council Strategic Housing Market Assessment, GVA

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				Settlement Hierarchy Background Paper September 2012, Bromsgrove District Council
BDP8 Affordable Housing	Sets out the thresholds and targets for affordable housing provision.	SO4	Policy compatible with paragraphs 50 and 54 of the NPPF.	Affordable Housing Viability Study, Level Worcestershire Strategic Housing Market Assessment, GVA
BDP 9 Rural Exception Sites	Policy sets out the criteria by which the need for affordable housing will be assessed.	SO4	Policy compatible with paragraphs 50 and 54 of the NPPF	Worcestershire Strategic Housing Market Assessment, GVA
BDP10 Homes for the Elderly	To provide adequate housing to meet the demographic trends of an ageing population	SO4, SO12	Policy compatible with paragraphs 50 and 159 of the NPPF	Housing Market Assessment, Housing Vision Strategic Housing Market Assessment for the South Housing Market Area of the West Midlands Region, The South Housing Market Partnership
BDP11 Accommodation for gypsies, travellers and showpeople	The policy provides criteria based guidance for gypsy and traveller sites to ensure future sites are in appropriate	SO4	Policy compatible with paragraphs 3, 4 and 10 of Planning Policy for Travellers.	Strategic Housing Market Assessment, GVA A Gypsy and Traveller Accommodation Assessment for the South Housing Market Area, The South Housing Market Partnership

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
	locations in accordance with identified needs.			
BDP12 Sustainable Communities	To provide sustainable communities that meets the needs of present and future residents in terms of service provision. This not only includes the provision of new services but the retention of existing facilities.	SO2, SO3, SO4, SO5, SO6, SO7, SO12	Policy compatible with paragraphs 28, 69 and 70 of the NPPF.	Sustainable Communities Act 2007 The Social Infrastructure Audit, Bromsgrove District Council Quality of Life Survey April 2008, Bromsgrove District Council
BDP13 New Employment	Sets out the types of employment opportunities that will help to broaden the economic base of the District and strengthen the local economy.	SO1, SO2, SO3 and SO5	Policy compatible with paragraphs 19, 21, 23 and 28 of the NPPF.	Employment Land Review 2012, Drivers Jonas Deloitte Employment Land Availability Report, Bromsgrove District Council
BDP14 Designated Employment	The policy provides for the protection and promotion of existing employment uses.	SO2, SO5	Policy compatible with Chapter 1 of the NPPF (Paragraphs	West Midlands Economic Strategy Employment Land Review, Drivers Jonas

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
			18-22).	Employment Land Availability Report, Bromsgrove District Council
BDP15 Rural Renaissance	To encourage the regeneration of rural areas and the promotion of sustainable rural communities.	SO2, SO3, SO4, SO5, SO8, SO12	Policy compatible with paragraphs 28, 34, 55, 89 and 97 of the NPPF.	Strategic Housing Land Availability Assessment, Bromsgrove District Council Housing Market Assessment, Housing Vision Quality of Life Survey April 2008, Bromsgrove District Council
BDP16 Sustainable Transport	Policy seeks to ensure sustainable transport opportunities are maximised together with opportunities to maximise use of green infrastructure for practical and recreational purposes.	SO6, SO7, SO8 & SO11.	Policy compatible with paragraphs 17, 29-41 of the NPPF.	Worcestershire Local Transport Plan 2006-2011, Worcestershire County Council Local Air Quality Management Detailed Assessment, Bromsgrove District Council Quality of Life Survey April 2008, Bromsgrove District Council Guidance on Transport Assessment, March 2007, DfT How Local Authorities can reduce emissions and manage climate risk, May 2012, Committee on Climate Change

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				Get Britain Cycling, Report from the Inquiry, All Party Parliamentary Cycling Group, April 2013
BDP17 Town Centre Regeneration	This policy seeks to set a framework for the regeneration of the Town Centre.	SO1, SO4, SO5, SO6, SO7, SO8, SO9, SO12.	Policy compatible with paragraphs 23, 24, 25, 26 and 27 of the NPPF.	Employment Land Review, Drivers Jonas Bromsgrove Town Centre Retail Capacity Report 2004, CBRE Quality of Life Survey April 2008, Bromsgrove District Council Bromsgrove Town Centre Health Check Leisure Centre Study Retail Study 2013 CBRE Town Centre Conservation Area Appraisal
BDP 18 Local Centres	This policy seeks to ensure that day to day local service needs are retained. It identifies compatible uses on the upper floors of retail premises in identified	SO3, SO6, SO7	Policy compatible with paragraphs 28, 37 and 70 of the NPPF	The Social Infrastructure Audit, Bromsgrove District Council BDC Settlement Hierarchy Background Paper September BDC 2012 Retail Study CBRE 2013

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
	local centres.			
BDP19 High Quality Design	This policy provides a set of principles to safeguard the local distinctiveness of the District and ensure a high quality, safe and distinctive design throughout the development.	SO6, SO7, SO8, SO9, SO11	<p>Policy compatible with paragraphs 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66 of the NPPF.</p> <p>The NPPF sets out the requirements for dealing with air pollution through the planning system in paragraphs 11, 120 and 124.</p> <p>The NPPF sets out the requirements for dealing with land contamination through the planning system in paragraphs 9, 11, 111, 120 and 121.</p>	<p>Standards and quality in development – a good practice guide (2<sup>nd</sup> edition), National Housing Federation</p> <p>Urban Design Compendium, Homes and Communities Agency</p> <p>Better Places to live by Design, Office of the Deputy Prime Minister</p> <p>Manual for Streets 1 &amp; 2, Communities and Local Government, Department for Transport, Chartered Institution of Highways and Transportation</p> <p>By Design: Urban Design in the Planning System, CABI</p> <p>Car parking: what works where, English Partnership</p> <p>Creating successful masterplans: a guide for clients, Commission for Architecture and the Built Environment</p> <p>Design Review, MADE</p> <p>Worcestershire Landscape Character Assessment, Worcestershire County Council</p>



Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				<p>Conservation Area appraisals, Bromsgrove District Council</p> <p>Historic Landscape Character Assessment of Worcestershire, Worcestershire County Council</p> <p>Building for Life 12, CABE</p> <p>Affordable Housing Viability Assessment, Level Ltd</p> <p>British Research Establishment Environmental Assessment Methods, British Research Establishment</p> <p>The Case for Space, Royal Institute of British Architects</p> <p>The Way We Live Now, Royal Institute of British Architects</p> <p>Space in new homes: what residents think, Commission for Architecture and the Built Environment</p> <p>Secured by Design, Association of Chief Police Officers</p> <p>Crowded Places: The Planning System and Counter-Terrorism and other relevant guidance, National Counter Terrorism Security Office</p>

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				<p>Trees and Woodland in Worcestershire, Worcestershire County Council</p> <p>Local Air Quality Management Detailed Assessment, Bromsgrove District Council</p> <p>Low Emissions Strategies: using the planning system to reduce transport emissions, Department for Environment, Food and Rural Affairs</p>
BDP20 Managing the Historic Environment	This policy seeks to ensure the positive management of the Districts heritage assets.	SO8	Policy compatible with paragraphs 126-141 of the NPPF.	<p>Historic Environment Assessment for Bromsgrove District Council, Worcestershire County Council</p> <p>Draft West Midlands Strategy – Putting the Historic Environment to Work 2009 Worcestershire Historic Farmstead Characterisation Project</p> <p>Worcestershire Landscape Character Assessment, Worcestershire County Council</p> <p>Conservation Principles 2008, English Heritage</p> <p>Building in Context 2001, CABE/</p>

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				<p>English Heritage Heritage at Risk, English Heritage annual report Heritage Gateway and Magic websites BDC Conservation Area Character Appraisals and Management Plans, Bromsgrove District Council BDC Village Design Statements, Bromsgrove District Council</p>
BDP 21 Natural Environment	This policy seeks safeguard and enhance the local distinctiveness of the District provided by the Natural Environment	SO8 and SO9	Policy compatible with paragraphs 109-125 of the NPPF	<p>National, Regional and Local Biodiversity Action Plans Worcestershire Geodiversity Action Plan, Earth Heritage Trust Worcestershire Geodiversity Audit Report, Earth Heritage Trust Planning Policy Statement 26: Tackling Climate Change Through Planning, Town and Country Planning Association Worcestershire Landscape Character Assessment, Worcestershire County Council Worcestershire Landscape Character</p>

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				<p>Assessment Supplementary Guidance, Worcestershire County Council</p> <p>Ecological Evidence for Strategic Sites Allocation, Bromsgrove District Council and Worcestershire Wildlife Trust</p> <p>Geological Evidence for Strategic Sites Allocation, Earth Heritage Trust</p> <p>Water Vole Strategy, Bromsgrove District Council</p> <p>The Green Infrastructure Baseline Report, Bromsgrove District Council</p> <p>Biodiversity 2020, Department for Environment, Food and Rural Affairs</p> <p>Living Landscape schemes, The Wildlife Trust</p>
BDP 22 Climate Change	Policy seeks to mitigate the causes of climate change and ensure development is designed to adapt to its impacts.	SO2, SO6, SO9, SO10 and SO11	Policy is compatible with paragraphs 93-99 of the NPPF and Planning practice guidance for renewable and low carbon energy	<p>Building a Greener Future: Policy Statement, DCLG</p> <p>Zero carbon strategies for tomorrow's new homes, Zero Carbon Hub</p> <p>Joint Bromsgrove and Redditch Climate Change Strategy and Action Plan, Bromsgrove District Council and Redditch Borough Council</p>

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				<p>Worcestershire Climate Change Strategy (draft), Worcestershire County Council</p> <p>Renewable Energy Study in Worcestershire (IT Power), Worcestershire County Council</p> <p>National Heat Map, Department of Energy and Climate Change</p> <p>Planning for Climate Change in Worcestershire, Worcestershire County Council</p> <p>Planning for Renewable Energy in Worcestershire, Worcestershire County Council</p> <p>Worcestershire Local Transport Plan 3, Worcestershire County Council</p> <p>Local Air Quality Management Detailed Assessment, Bromsgrove District Council</p> <p>Affordable Housing Viability Assessment, Level Ltd</p> <p>Worcestershire Waste Core Strategy, Worcestershire County Council</p> <p>UK Climate Change Risk Assessment,</p>

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				Department for Environment, Food and Rural Affairs National Adaptation Programme (underway), Department for Environment, Food and Rural Affairs Planning for Climate Resilient Infrastructure Report, Worcestershire County Council
BDP23 Water Management	<i>This policy provides a set of principles to ensure sustainability of the water environment and safeguard developments from the risks of flooding</i>	SO9, SO10	Policy compatible with paragraphs 94, 99, 100, 101, 102, 103, 104 of the NPPF and PPS25 Development and Flood Risk Practice Guide	Level 1 Strategic Flood Risk Assessment for Bromsgrove and Redditch, Royal Haskoning Level 2 Strategic Flood Risk Assessment for Bromsgrove and Redditch, MWH Outline Water Cycle Study for Bromsgrove and Redditch, MWH Planning for Water, Worcestershire County Council Affordable Housing Viability Assessment, Level Ltd Worcestershire Local Flood Risk Management Strategy (on-going), Worcestershire County Council Severn River Basic Management Plan,

Policy	Summary	Strategic/ Sustainability objectives	Policy Context/ compatibility with NPPF	Evidence Base
				Environment Agency
BDP24 Green Infrastructure	This policy provides a set of principles to safeguard the delivery of a high quality multifunctional green space within and beyond the district boundaries	SO5, SO6, SO7, SO8, SO9, SO10, SO11	Policy compatible with paragraphs 28, 29, 69, 73, 74, 75, 93, 99, 109, 114, 126 of the NPPF	Worcestershire Green Infrastructure Strategy(on-going), Worcestershire County Council Worcestershire Green Infrastructure Framework Documents, Worcestershire County Council Bromsgrove Green Infrastructure Baseline Report, Bromsgrove District Council
BDP25 Health and Well Being	To improve the quality of life and well-being of Bromsgrove by promoting active, healthy lifestyles as well as improving access to health and leisure facilities. Also includes restrictions regarding the provision of A5 Hot food takeaways.	SO1, SO6, SO7	Policy compatible with Chapter 8 of the NPPF, particularly paragraphs 69, 70, 73, 74 and 75.	Healthy Weight, Healthy Lives: A Cross-Government Strategy for England, HM Government 2008 Quality of Life Survey 2008

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## Appendix II

### Glossary

This glossary of terms is intended to act as a reference point for unfamiliar or technical terms included in the Bromsgrove District Plan. Unless stated, these are not definitive or legal descriptions.

**Area of Development Restraint (ADR)** - Areas of land taken out of the Green Belt in the Local Plan which have been identified as possible land for new development when required in the future

**Affordable Housing** - Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes, or in relation to the price of general market housing.

**Affordable Rent** - Accommodation that is let by a Registered Social landlord to those eligible for social rented accommodation at no more than 80% of local market rents

**Annual Monitoring Report (AMR)** – The report prepared by Councils to assess the implementation of the Local Development Scheme and the extent to which the policies of the Local Development Framework are being achieved.

**Biodiversity** - The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

**Biodiversity Action Plan (LBAP)** - The local Worcestershire Biodiversity Action Plan identifies local priorities to determine the contribution they can make to the delivery of the national Species and Habitat Action Plan targets

**Employment Land Review (ELR)** – Document that assesses existing employment land in the District, considers future requirements and identifies a portfolio of sites where employment development could be located.

**Geodiversity** - The variety of earth materials, forms and processes that constitute and shape the Earth, either the whole or a specific part of it. Relevant materials include minerals, rocks, sediments, fossils, soils and water.

**Green Belt** – Land allocated for a district to prevent urban sprawl by keeping land permanently open. Guidance on Green Belt policy is contained in PPG2, and the Worcestershire Structure Plan identifies the broad extent of Green Belt within Bromsgrove District and the Local Plan defines detailed boundaries of Green Belt land.

**Greenfield** - Land (or a defined site) that has not previously been developed.

**Green Infrastructure** - “The network of green spaces and natural elements that intersperse and connect our cities, towns and villages. It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats. Street trees, natural heritage and open countryside. Green Infrastructure provides multiple benefits for the economy, the environment and people”  
West Midlands Green Infrastructure Prospectus

**Heritage Asset-** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Horsiculture-** The commercial development of the countryside for pasturing or exercising horses.

**Local Centre-** Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. Local centres may also provide the focus for other community social facilities including health or education.

**Local Development Scheme (LDS)** – Sets time-scales for the preparation of Local Development Documents that must be agreed with the Government and reviewed annually.

**Listed Building** - A building of special architectural or historic interest, graded I, II\* or II with grade I being the highest. Listing includes the interior as well as the exterior of the building and any permanent structures (e.g. walls within its curtilage).

**Major Urban Area (MUA)** -The main urban area of the West Midlands Region, as identified on the RSS Spatial Strategy Diagram (see the inside back cover of West Midlands Regional Spatial Strategy).

**Planning Policy Statements/Guidance (PPGs/PPSs)** - National planning policy published by the Department for Community and Local Government, all regional and local planning policy must be in general conformity with this guidance.

**Previously Developed Land (PDL)** – Land that contains permanent buildings (excluding agriculture or forestry buildings) and associated fixed-surface infrastructure. The definition covers the curtilage of the development.

**Renewable Energy** - Energy flows that occur naturally and repeatedly in the environment, for example from wind, water flow, tides or the sun.

**Sites of Importance for Nature Conservation (SINC)** – Defined areas of ecological or geological importance identified to protect habitat and species diversity.

**Sites of Special Scientific Interest (SSSIs)** – Relates to specifically defined areas where protection is afforded to sites of national wildlife or geological interest. Natural England is responsible for identifying and protecting these sites.

**Strategic Flood Risk Assessment (SFRA)** – A document that examines the potential for flooding from all sources in the area, this includes the potential impacts from climate change. It examines the impact of new development both within and beyond the District.

**Strategic Housing Land Availability Assessment (SHLAA)** – A document that identifies suitable and available housing sites for up to the next 15 years. The document is evidence for plan making and does not allocate land for development.

**Strategic Housing Market Assessment (SHMA)** – an assessment of housing needs in the local area. This assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period, addressing the need for all types of housing.

**Sustainability Appraisal (SA)** - Appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

**Sustainable Development** - A widely used definition drawn up by the World Commission on Environment and Development in 1987: *“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs”*. The Government’s four aims, to be achieved simultaneously are:

- Social progress which recognises the needs of everyone
- Effective protection of the environment
- Prudent use of natural resources
- Maintenance of high and stable levels of economic growth and employment.

#### **Sustainable Drainage Systems –**

SuDS are made up of one or more structures built to manage surface water runoff including for example, rainwater recycling, pervious paving, the use of green roofs, balancing ponds and soakaways. A holistic approach should be adopted so that each element is operated collectively rather than as a series of isolated drainage devices.

#### **SuDS management (or treatment) Train concept**

The SuDS management train is to reduce flows and volumes of surface water as close to source as possible through four main stages: Prevention → Source Control → Site Control → Regional Control. The idea is to apply

different SuDS components at each stage such that the water quality of receiving water will improve as a result.

Therefore a variety of techniques are employed in a sequence to improve the quality of water in line with the Water Framework Directive.

**Special Wildlife Site (SWS)** - These places are considered to be the best places for wildlife outside of legally protected areas such as SSSIs, National Nature Reserves and Local Nature Reserves.

**Use Class** - The Town and Country Planning (Use Classes) Order 1987 puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same use class.

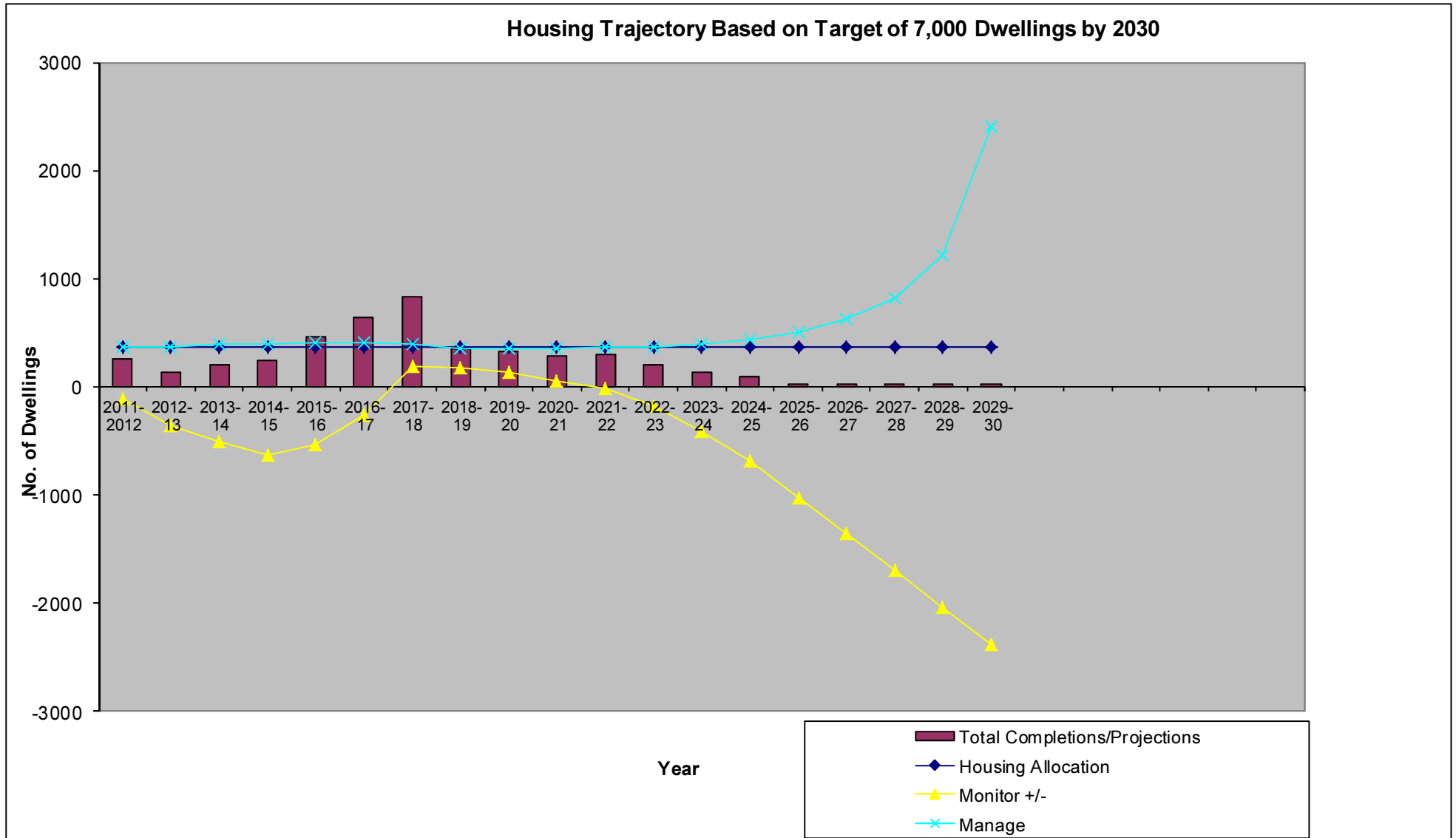
**Viability** – To be capable of existing or surviving in a successful manner. The term is often used in the context of whether town centres are able to exist as viable retail centres. Financial viability is about being able to generate sufficient income to meet overheads and allow growth whilst still being able to maintain service levels.

**Vitality** – Used to describe the liveliness of an area, which may be measured by particular local features, the general environment or the quality of life for local residents. In the context of town centres, this term can be used to describe the capacity of a centre to grow or develop.

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**Appendix III  
Housing Trajectory**

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**Appendix IV Superseded BDLP Policies and Proposals**

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## Superseded Local Plan Policies and Proposals

The following policies and proposals, together with supporting paragraphs, in the adopted Bromsgrove District Local Plan 2004 will be replaced upon adoption of this Development Plan (Regulation 13(5)).

Policy Number	Policy Name	BDP Policy – superseded by
<b>District Strategy</b>		
DS1	Green Belt Designation	BDP4
DS2	Green Belt Development Criteria	BDP4
DS3	Main Locations for Growth	BDP2
DS4	Other Locations for Growth	BDP2
DS5	Village Envelope Settlements	BDP4
DS8	Areas of Development Restraint	BDP5
DS9	Protection of Designated Environmental Areas	BDP21
DS11	Planning Obligations	BDP6
<b>Housing</b>		
S3	Windfall Policy	BDP2
S4	Monitoring of Housing Sites	BDP2
S6	Special Needs in Housing	BDP7, BDP8, BDP10, BDP11
S7	New Dwellings Outside the Green Belt	BDP1, BDP2, BDP7, BDP16, BDP19, BDP24, BDP25
S8	Plot Sub-Division	BDP19
S9	New Dwellings in the Green Belt	BDP1, BDP2, BDP4, BDP8, BDP15, BDP16,
S10	Extensions to Dwellings Outside the Green Belt	Partly replaced by BDP1, BDP19
S11	Extensions to Dwellings in the Green Belt	Partly replaced by BDP1, BDP4, BDP19
S12	Replacement of Dwellings in the Green Belt	Partly replaced by BDP4, BDP16
S13	Sub-division of Dwellings in the Green Belt	Partly replaced by BDP1, BDP4, BDP16, BDP19
S13A	Changes of Use of Dwellings in the Green Belt	Partly replaced by BDP1, BDP4
S14	Range of Housing Types and Tenures	BDP7
S15	Affordable Housing in Urban Areas	BDP8
S16	Affordable Housing in Green Belt Areas	BDP8
S17	Caravan/ Mobile Home sites	BDP4, BDP15
S18	Gypsies	BDP11
S19	Incompatible Land Uses	BDP1
<b>Shopping</b>		
S20	Main Shopping Location	BDP17
S21	Out of Town Shopping	Partly replaced by BDP4, BDP16, BDP17
S22	Provision for Local Shopping Facilities in New Residential Areas	Partly replaced by BDP1, BDP16, BDP17, BDP18
S23	Shopfront Enhancement	Partly replaced by BDP17,



		BDP19
S24	Retention of Traditional Shopfronts	Partly replaced by BDP19
S24a	Original Features on Shopfronts	Partly replaced by BDP19
S25	New Shopfronts	Partly replaced by BDP19
S26	Shopfront Fascias	Partly replaced by BDP19
S27	Standards of Fascia Design	Partly replaced by BDP19
S27A	Projecting Signs	Partly replaced by BDP19
S27B	Design and Material in Conservation Areas	Partly replaced by BDP19, BDP20
<b>Community Facilities</b>		
S28	New and Enhanced Community Facilities	BDP12
S29	Access for the Disabled	BDP16, BDP19
S31	Development of Educational Establishments	Partly superseded by BDP6, BDP25
S32	Loss of Private Playing Fields	BDP12
S33	Mobile Classrooms	Not carried forward
<b>Conservation</b>		
S35	Proposed New and Extended Conservation Areas	BDP20
S35A	Development in Conservation Areas	BDP20
S36	Design of Development in Conservation Areas	BDP20
S37	Demolition in Conservation Areas	BDP20
S38	Protection of Buildings of Merit	BDP20
S39	Alterations to Listed Buildings	BDP20
S39A	Demolition of Listed Buildings	BDP20
S41	Listed Buildings in Shopping Areas	Partly superseded by BDP20
S42	Shopfronts in Conservation Areas	Partly superseded by BDP20
S43	Traffic Calming Schemes	Not carried forward
S44	Reinstatement of Features in Conservation areas	BDP20
S45	Improvements to Conservation Areas	BDP20
S46	Areas of Special Advertising Control	Not carried forward
S47	Advertising Control	Partly superseded by BDP1
S48	Historic Parks and Gardens	BDP20
<b>Landscape</b>		
C1	Designation of Landscape Protection Areas	BDP21
C4	Criteria for Assessing Development Proposals	BDP21
C5	Submission of Landscape Schemes	Partly Superseded by BDP19.
C6	Sites for Environmental Improvements	BDP19
<b>Nature Conservation</b>		
C9	Development Affecting SSSI's and NNR's	BDP21
C10	Development Affecting SWS's and LNR's	BDP21
C10A	Development Affecting Other Wildlife Sites	BDP21
C12	Wildlife Corridors	BDP21, BDP24
C16	Effect of Infrastructure Development on the Landscape	BDP21
<b>Woodlands</b>		

C17	Retention of Existing Trees	BDP19
C18	Retention of Existing Woodland	BDP21
C19	Tree Preservation Orders	Not carried forward
<b>Agriculture</b>		
C21	New Agricultural Dwellings	BDP15
C22	Siting of New Agricultural Dwellings	Partly superseded by BDP15
C23	Additional Dwelling Units on Farms	BDP15
C24	Removal of Occupancy Conditions	BDP15
C27	Re-Use of Existing Rural Buildings	Partly superseded by BDP1, BDP4, BDP15, BDP16, BDP19
C27A	Removal of Permitted Development Rights	BDP15 (Footnote)
C27B	Residential and Commercial Re-Use of a Rural Building	Not carried forward
C27C	Extensions to Converted Rural Buildings	Not carried forward
C29	Conversion of Listed Buildings	BDP20
C30	Twelve Month Limit for Re-Use of Building	Not carried forward
C30A	New Agricultural Buildings	Partly Superseded by BDP19.
<b>Farm Diversification</b>		
C31	Farm Diversification Schemes	BDP15
C32	Farm Diversification Schemes	BDP15
C33	Farm Shops	BDP15
C34	Horticultural Nurseries	Not carried forward
<b>Archaeology</b>		
C36	Preservation of Archaeological resources	BDP20
C37	Excavation Around Archaeological Remains	BDP20
C38	Development Criteria for Archaeological Sites	BDP20
C39	Site access for Archaeologists	BDP20
<b>Employment</b>		
E2	Employment Land for Redditch Related Needs	BDP5
E3	Employment Land for the Remainder of the District	BDP14
E4	Extension to Existing Commercial Uses	BDP1, BDP13, BDP14
E6	Inappropriate Land Uses in Employment Areas	BDP14
E7	Development Briefs for Large Sites	Not carried forward
E9	Criteria for New Employment Development	BDP1, BDP13
E10	Retail or Recreational Uses on Employment Land	BDP14
E11	Signing on Industrial Estates	Not carried forward
<b>Transport</b>		
TR1	The Road Hierarchy	BDP1, BDP16
TR2	Safeguarding of Land for Future Road Proposals	Not carried forward
TR3	Development Adjacent to Major Highways Junctions	Not carried forward
TR4	Motorway Service Areas	Not carried forward
TR5	Railfreight	BDP16

TR5A	Railfreight	BDP16
TR6	Traffic Management Systems	BDP16
TR8	Off-Street Parking Requirements	BDP16
TR9	Making Up of Roads to Adoptable Standards	Not carried forward
TR10	Car Parking Provision for Disabled Motorists	BDP16
TR11	Access and Off-Street Parking	BDP16
TR12	Reduced Car Parking Standards	Not carried forward
TR13	Alternative Modes of Transport	BDP16
TR15	Car Parking at Railway Stations	Not carried forward
TR16	Cycle Routes	BDP16
<b>Recreation</b>		
RAT1	Recreational use on lower quality agricultural land	Not carried forward
RAT2	Recreational development criteria in the Green Belt	Partly superseded by BDP4, BDP16, BDP20, BDP19, BDP25
RAT3	Indoor Sports Development Criteria	Partly superseded by BDP1, BDP16, BDP25
RAT4	Provision of Open Space	BDP24
RAT5	Open Space Provision in New Residential Developments	BDP24
RAT6	Open Space Provision in New Residential Developments	BDP24
RAT7	Sports Hall Standards	Partly superseded by BDP4, BDP1, BDP16
RAT8	Dual Use Facilities	Partly superseded by BDP1, BDP4, BDP16, BDP19
RAT9	Allotments	BDP24
<b>Rights of Way</b>		
RAT12	Support for Public Rights of Way	BDP16, BDP24
RAT13	Stopping up a Right of Way	Partly superseded by BDP16, BDP24
RAT16	Equestrian Activities	BDP15, BDP21
RAT17	Stabling	BDP1, BDP4, BDP15, BDP16, BDP21, BDP23
RAT19	Safeguarding Commons and Greens	BDP24
RAT20	Re-use of Mineral Workings for Recreational Activities	BDP21, BDP24
RAT21	Golf Courses	Partly superseded by BDP16, BDP19, BDP20, BDP21, BDP23, BDP24, BDP25
<b>Tourism</b>		
RAT22	Tourism Schemes	BDP15
RAT23	Promotion of Tourism	Partly superseded by BDP15
RAT24	New Hotels	BDP1, BDP3, BDP16, BDP19
RAT25	Extension to Hotels	BDP1, BDP4, BDP16, BDP19
RAT26	Conversion of Buildings to Hotels	Partly superseded by BDP1, BDP4, BDP16, BDP19
RAT27	Self Catering Accommodation	Not carried forward

RAT28	Farm-based Accommodation	Not carried forward
RAT29	Static Holiday Caravans or Chalet Sites	BDP4
RAT30	Caravan Storage	BDP4
RAT33	Visitor Facilities	BDP1, BDP4, BDP16, BDP19, BDP20
RAT34	Tourist Potential of Canals	Partly superseded by BDP4, BDP16, BDP19, BDP20, BDP21, BDP24
RAT35	Coach/Bus Parking Facilities	BDP1, BDP16, BDP20, BDP21
<b>Environmental Services</b>		
ES1	Protection of Natural Watercourse Systems	BDP23
ES2	Restrictions on Development Where Risk of Flooding	BDP23
ES3	Sewerage Systems	BDP23
ES4	Groundwater Protection	BDP23
ES5	Sewerage Treatment Facility Provision	BDP23
ES6	Use of Soakaways	BDP23
ES7	Sites Suspected of Contamination	Not carried forward
ES8	Development Near Hazardous Installations	Not carried forward
ES9	Undergrounding of Supply Cables	BDP1
ES11	Energy Efficiency in Buildings	BDP23
ES12	Provision of Recycling Facilities	BDP23
ES13	Development of Telecommunication facilities	Partly superseded by BDP20, BDP21
ES14	Development Near Pollution Sources	BDP19
ES14A	Noise Sensitive Development	BDP19
ES16	Reforming of Land	Partly superseded by BDP12, BDP21
<b>Area Policies</b>		
ALVE2	Development Within Alvechurch Shopping Area	BDP18
ALVE3	Provision of Additional Off-street Parking Near Alvechurch Station	Not carried forward
ALVE4	Site for Open Space and Water Recreation	Not carried forward
ALVE5	Density Restrictions	Partly superseded by BDP7, BDP19
ALVE6	ADR: Land to North of Crown Meadow	BDP5B
ALVE7	ADR: Land to North of Rectory Lane	BDP5B
ALVE8	ADR: Land to South of Rectory Lane	Not carried forward
BG1	Development within Barnt Green Shopping Area	BDP18
BG2	Station Approach Development Site	Not carried forward
BG3	Improvements to Car parking provision	Not carried forward
BG4	Retention of character of Area	Partly superseded by BDP7, BDP19
BEL1	Village Envelope: Belbroughton	BDP4
BE1	Village Envelope: Beoley	BDP4
BE2	Site for play area: Holt End	Partly superseded by BDP25

BE3	ADR: Land at Ravensbank Drive	BDP5
BOUR1	Village Envelope: Bournheath	BDP4
BROM5	ADR: Barnsley Hall South and Norton Farm	BDP5
BROM5A	ADR: Land at Perryfields Road East	BDP5
BROM5B	ADR: Land North of Perryfields Road	BDP5
BROM5C	ADR: Land Adjacent to Former Wagon Works	BDP5
BROM5D	ADR: Land at Perryfields Road West	BDP5
BROM5E	ADR: Land at Church Road, Catshill	BDP5
BROM5F	ADR: Land at Whitford Road	BDP5
BROM6	Employment development site: Stoke Prior	BDP14
BROM9	Re-zoning to residential use: Willow Road	Not carried forward
BROM11	Town Centre Zone	BDP17 and Proposals Map
BROM12	Primary and Secondary Shopping Areas	BDP17 and Proposals Map
BROM13	Development in Primary Shopping Area	BDP17
BROM14	Development in Secondary Shopping Area	BDP17
BROM16	Amalgamation of Shop Units	Partly superseded by BDP17
BROM18	Improvements to Shopping Environment	Partly superseded by BDP17
BROM19	Development of Alleyways and Town Courts	Partly superseded by BDP17
BROM22	Improvements to the Shopping Environment	Partly superseded by BDP17
BROM23	Development in Catshill Shopping Area	BDP18
BROM24	Development in Aston Fields Shopping Area	BDP18
BROM28	Play Area and Open Space	Superseded by BDP25
BROM30	Avoncroft Museum	BDP15
BROM32	Strategic Open Space	Partly covered by BDP25
BUR1	Village Envelope: Burcot	BDP4
CL1	Village Envelope: Clent	BDP4
CH1	Environmental Improvements at Rednal	BDP19
FAR1	Village Envelope: Fairfield	BDP4
FIN1	Village Envelope: Fininstall	BDP4
FIN3	Site for Open Space: Penmanor	Partly superseded by BDP25
FIN4	Site for Open Space: Heydon Road	Partly superseded by BDP25
FR2	Site for Open Space: Holy Trinity Cricket Club	Partly superseded by BDP25
FR3	Site for Play Area: Holly Hill Road	Partly superseded by BDP4
FR4	ADR: Land of Egghill Lane	BDP5
HAG2	ADR: Kidderminster Road South	BDP5
HAG2A	ADR: Land at Algoa House	BDP5
HAG2B	ADR: Land South of Kidderminster Road	BDP5
HAG3	Development in Hagley Shopping Area	BDP18
HAG5	Wildlife Site Designation: Land at Sweetpool, Hagley	BDP21
HOL1	Village Envelope: Holy Cross	BDP4
HOP1	Village Envelope: Hopwood	BDP4
ROM1	Village Envelope: Romsley	BDP4
ROM2	Site for Play Area: Land off Dark Lane	Partly superseded by BDP25
ROW1	Village Envelope: Rowney Green	BDP4
RUB2	Development in Rubery Shopping Area	BDP18

<b>RUB4</b>	<b>Residential Development Site in Rubery Shopping Area: Whetty Lane</b>	<b>Not carried forward</b>
<b>RUB5</b>	<b>Site for Play Area: Land off New Inns Lane</b>	<b>Partly superseded by BDP25</b>
<b>TARD1</b>	<b>Site for Recreation/Leisure Purposes</b>	<b>Partly superseded by BDP25</b>
<b>WYT1</b>	<b>Development in Wythall Shopping Area</b>	<b>BDP18</b>
<b>WYT2</b>	<b>Wildlife Area: Beaudesert Road</b>	<b>BDP21, BDP 25</b>
<b>WYT3</b>	<b>Nature Reserve: Sycamore Drive</b>	<b>BDP21, BDP 25</b>
<b>WYT4</b>	<b>Access to Birmingham Midland Museum of Transport</b>	<b>Partly superseded by BDP16</b>
<b>WYT5</b>	<b>Recreational Development at Wythall Park</b>	<b>Partly superseded by BDP25</b>
<b>WYT6</b>	<b>New Sports Pitches: Alcester Road</b>	<b>Partly superseded by BDP25</b>
<b>WYT7</b>	<b>Playing Fields: Walkers Heath</b>	<b>Partly superseded by BDP25</b>
<b>WYT8</b>	<b>Site for Recreational Use: Shirley Quarry</b>	<b>Partly superseded by BDP25</b>
<b>WYT9</b>	<b>Site for Open Space: Falstaff Avenue</b>	<b>BDP25</b>
<b>WYT10</b>	<b>Park and Ride Facilities at Wythall Railway Station</b>	<b>Not carried forward</b>
<b>WYT11</b>	<b>Site for New Church: Silvermead School</b>	<b>Partly superseded by BDP12</b>
<b>WYT13</b>	<b>Gypsy Caravan Site</b>	<b>Not carried forward</b>
<b>WYT15</b>	<b>ADR: Land of Selsdon Close, Grimes Hill</b>	<b>BDP5</b>
<b>WYT16</b>	<b>ADR: Land at Bleakhouse Farm</b>	<b>BDP5</b>

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**Appendix V**  
**Monitoring indicators**

<b>Policy</b>	<b>Target/Indicator</b>
<b>BDP1 – Sustainable Development Principles</b>	Number of bus and rail travellers % of people usual method of travel Number of trips made by public transport Decrease in CO2 emissions Number of new AQMA's declared No of parks and areas of recreation space  Total number of listed buildings No of listed buildings demolished No of listed buildings at risk % of unemployment
<b>BDP2 – Settlement Hierarchy</b>	% of development on PDL % of development in each settlement type
<b>BDP3 – Future Development</b>	Net additional dwellings completed No. of hectares of employment completed No. of years of housing supply
<b>BDP4 – Green Belt</b>	% of District under Green Belt designation No of planning applications on green belt land % of planning applications on green belt land approved % of planning applications on green belt land refused Area (in hectares) of green belt land loss
<b>BDP5A – Bromsgrove Town Expansion Sites</b>	No. of dwellings completed on expansion sites No. affordable dwellings on expansion sites No. of hectares of employment completed on expansion sites Amount of retail floorspace completed on expansion sites Amount of open space on expansion sites
<b>BDP5B – Other Development Sites</b>	No. of dwellings completed on development sites No. of hectares of employment completed on development sites Amount of open space on development sites
<b>RCBD1 – Redditch Cross Boundary Development</b>	No. of dwellings completed on cross boundary sites No. of affordable dwellings on cross boundary sites Amount of retail floorspace completed on

	<p><b>cross boundary sites</b>  <b>Amount of open space on cross boundary sites</b></p>
<b>BDP6 – Infrastructure Contributions</b>	<p><b>No. of completed Section 106 Agreements</b>  <b>No. of CIL receipts collected</b></p>
<b>BDP7 – Housing Mix and Density</b>	<p><b>Average density of development achieved across the District</b>  <b>No. of dwellings built at less than 30 dwellings per hectare</b>  <b>No. of dwellings built between 30 and 50 dwellings per hectare</b>  <b>No. of dwellings built at greater than 50 dwellings per hectare</b>  <b>No. and % percentage of dwellings completed in each size category (e.g. 1 bed, 2 bed, 3 bed, 4 bed and 5 bed dwellings)</b></p>
<b>BDP8 – Affordable Housing</b>	<p><b>No. of affordable houses completed</b>  <b>No. of affordable completions in each Parish</b>  <b>No. of 100% affordable housing</b></p>
<b>BDP9 – Rural Exception Sites</b>	<p><b>No. of affordable houses completed through exception schemes</b></p>
<b>BDP10 – Homes for the Elderly</b>	<p><b>No and types units completed for the elderly</b>  <b>No. of units built to Lifetime Home Standards</b></p>
<b>BDP11 – Accommodation for Gypsies, Travellers &amp; Showpeople</b>	<p><b>Occupancy rates</b>  <b>No of pitches provided in District</b></p>
<b>BDP12 – Sustainable Communities</b>	<p><b>Increase or decrease in the number of local facilities in the district</b></p>
<b>BDP13 – New Employment Development</b>	<p><b>Total amount of Employment Completions (B1, B2, B8)</b>  <b>Employment completions by Parish</b>  <b>Amount of available employment land</b>  <b>% of unemployment</b>  <b>No. of VAT Registered businesses – registrations/deregistrations</b></p>
<b>BDP14 – Designated Employment</b>	<p><b>Amount of employment land lost to other uses</b>  <b>No. of extensions granted to existing employment premises</b></p>
<b>BDP15 – Rural Renaissance</b>	<p><b>No. of agricultural dwellings completed</b>  <b>No. of affordable houses completed through exception schemes</b></p>
<b>BDP16 – Sustainable Transport</b>	<p><b>Number of bus and rail travellers</b>  <b>% of people usual method of travel</b></p>



	<p>Number of trips made by public transport</p> <p>Proportion of new housing within 30 minutes by public transport from key facilities</p> <p>Proportion of development within 800 metres/13 minutes walk from hourly bus service</p> <p>% access to GP</p>
BDP17 – Town Centre Regeneration	<p>No. of Town Centre Delivery Sites completed</p> <p>Diversity of main town centre uses</p> <p>Proportion of vacant street level property</p> <p>Pedestrian flows</p>
BDP18 – Local Centres	<p>Diversity of local centre uses</p> <p>Proportion of vacant street level property</p>
BDP19 – High Quality Design	<p>Proportion of relevant schemes incorporating “secured by design” principles</p> <p>% of people to which fear of crime is an issue</p> <p>Number of recorded crimes</p> <p>Number of ASBO’s</p> <p>% of non-residential developments to meet BREEAM ‘very good’ standard</p> <p>% of affordable housing to meet the Code for Sustainable Home Level 6</p> <p>The level of the Code for Sustainable Homes achieved by market (% achieved for each code level)</p> <p>No. of schemes achieving Building for Life diamond status</p> <p>Decrease in CO2 emissions</p> <p>Number of new AQMA’s declared</p>
BDP20 – Managing the Historic Environment	<p>Total number of listed buildings</p> <p>No of listed buildings demolished</p> <p>No of listed buildings at risk</p> <p>Total number of Registered Parks, Gardens and Scheduled Ancient Monuments</p> <p>No. of Conservation Areas</p> <p>Proportion of Conservation Areas with Character Assessments completed</p> <p>No of buildings on local list of architectural merit</p>
BDP21 – Natural Environment	<p>% of total land use under landscape designation</p> <p>% of planning permissions granted in the Green Belt</p> <p>% of planning permissions affecting areas of</p>

		<p>recognised landscape value</p> <p>No. of SWS</p> <p>No. of SSSI</p> <p>No. of BAP habitats</p>
<b>BDP22 – Climate Change</b>		<p>Decrease in CO2 emissions</p> <p>Decrease in average electricity consumption per household/ year in line with Government targets</p> <p>% of new developments with energy efficient design</p> <p>Number of new developments with on-site renewable energy</p> <p>Number of bus and rail travellers</p> <p>% of people usual method of travel</p> <p>Number of trips made by public transport</p> <p>Proportion of new housing within 30 minutes by public transport from key facilities</p> <p>Proportion of development within 800 metres/13 minutes walk from hourly bus service</p> <p>Number of noise related complaints</p> <p>Vehicle flows through urban areas</p> <p>Number of new AQMA's declared</p> <p>% waste recycled per year</p> <p>% of rivers with fairly good or better biological and chemical water quality</p> <p>Number of new developments on flood plains</p> <p>Number of schemes incorporating water harvesting</p> <p>Number of new industries/companies developing new technology addressing climate change</p> <p>Number of new developments incorporating opportunities for recycling</p>
<b>BDP23 – Water Management</b>		<p>No of incidences of flooding</p> <p>No of new properties built in the flood plain</p> <p>No of new developments incorporating SuDS</p> <p>No of planning permissions granted contrary to advice of EA</p>
<b>BDP24 – Green Infrastructure</b>		<p>No of parks and areas of recreation space</p> <p>Proportion of eligible open space maintained to “green flag” standard</p> <p>% of allotments lost to development</p> <p>% loss of recreational land and/or buildings lost to development</p>
<b>BDP25 – Health and Well</b>		<p>No. units with A5 use</p>

<b>Being</b>	<b>No. of new cycle routes</b> <b>No. of applications with cycling facilities</b> <b>% of obese children in Year 6 of Primary School</b> <b>Mortality rates from all circulatory diseases under the age of 75</b>
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# Sustainability Appraisal of Bromsgrove District Plan Proposed Submission version

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## 1. Introduction

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### 1.1 Scope of the Document

- 1.2 This document comprises an assessment of the effects of the Bromsgrove District Plan against sustainability objectives.
- 1.3 The requirement for Sustainability Appraisal (SA) to be undertaken on Development Plan Documents is mandatory under the Planning and Compulsory Purchase Act 2004. The Act also stipulates that the SA must meet the requirements of the SEA Directive<sup>1</sup>, which was transposed directly into UK law in July 2004 through the English<sup>2</sup> SEA Regulations. The Bromsgrove District Plan also falls specifically within the requirements of the SEA Regulations as their first formal preparatory act was after the 21 July 2004. The aim of the SA has been to ensure that the principles of sustainable development are fully integrated into the preparation of the Bromsgrove District Plan.
- 1.4 Bromsgrove DC prepared a SA Scoping Report<sup>3</sup> in July 2005, which was updated in 2008 and again in 2012. This set the scope and context for the SA and also set an SA Framework comprising sustainability objectives, indicators and targets to be used as a yardstick to assess the effects on sustainable development of the Bromsgrove District Plan and future Development Plan Documents. The West Midlands Regional Sustainable Development Framework (WMRSDF) sets out 29 objectives for sustainable development in the Region. These reflect key regional priorities around environment, resources and the economy.

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<sup>1</sup> European Commission (2001): *Strategic Environmental Assessment Directive 2001/42/EC (on the assessment of the effects of certain plans and programmes on the environment)*

<sup>2</sup> HMSO (2004): *S.I. 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004*, HMSO, London

<sup>3</sup> Bromsgrove DC (2005): *Sustainability Appraisal Scoping Report – Planning in Bromsgrove 2004-2007*, Bromsgrove DC, Bromsgrove

The WMRSDF recommends that the objectives are incorporated into the appraisals of Development Plan Documents.

- 1.5 Worcestershire County Council has co-ordinated a joint Worcestershire SEA/SA Framework for the County. This involves a single appraisal framework covering all of Worcestershire which ensures consistency of approach in appraisal and in data collection. It includes agreement to a suite of generic SA objectives that reflect the WMRSDF, Community Strategy and sustainability issues that can be supplemented with a set of decision making criteria to reflect the detail and scope of each DPD being prepared and an agreed method for prioritising SA objectives.
- 1.6 Hyder Consulting (UK) Ltd. prepared an interim, *Appraisal of Issues and Options Paper* in 2005, which compared and assessed alternative strategic and policy options for the Core Strategy and made recommendations for the contents of the Draft Core Strategy. SA's were undertaken and published alongside both the Draft Core Strategy (2008) and the Draft Core Strategy 2 (2011). Through each stage it is clear how options have been assessed and discounted with the continual refinement of a preferred option. Following major legislative changes through the introduction of the Localism Act 2011 and the publication of the National Planning Policy Framework (NPPF) the emerging development plan is now referred to as the Bromsgrove District Plan rather than a Core Strategy.
- 1.7 This report documents the findings of the assessment of effects on sustainable development of the Bromsgrove District Plan and makes further recommendations to mitigate any adverse effects identified as appropriate. Throughout, guidance has been followed from the CLG Plan Making Manual and where appropriate to the ODPM document:

- ODPM (2005): *A Practical Guide to the Strategic Environmental Assessment Directive*<sup>4</sup>

1.8 Earlier versions of the SA to support previous versions of the plan were developed in accordance with the ODPM guidance entitled *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*<sup>5</sup> (2005). This guidance has been superseded by Sustainability Appraisal section contained within the CLG Plan Making Manual.

### **1.9 What Happens Next?**

1.10 The findings of this report will be incorporated into a further revision of the Bromsgrove District Plan as deemed appropriate.

1.11 This SA Report will be released for consultation alongside the Bromsgrove District Plan in accordance with the requirements of the SEA Directive.

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<sup>4</sup> ODPM (2005): *A Practical Guide to the Strategic Environmental Assessment Directive*, ODM, London

<sup>5</sup> ODPM (2005): *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*, ODPM, London

## **2 Methods**

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### **2.1 Introduction**

2.2 The methodological approach to assessing the likely significant effects of the District Plan is underpinned by the SA Framework. The SA Framework was initially developed by Bromsgrove DC with input from Hyder and further modified in response to sub-regional joint working. The SA Framework is applied to each of the draft Policies of the District Plan in order to identify key strengths (likely positive effects) and weaknesses (likely negative effects) in terms of delivering sustainable development and to recommend mitigation measures in order to offset or eliminate any adverse effects identified.

### **2.3 The SA Framework**

### **2.4 SA Objectives and Indicators**

2.5 A series of environmental, social and economic SA objectives were developed to use as methodological yardsticks against which the District Plan policies are assessed (see Section 2.9 on the 'Appraisal Matrix' for details of how this is undertaken in practice). The SA objectives are distinct from the objectives of the District Plan. To help measure the performance of the options and policies against the objectives, a series of indicators were developed and, where appropriate, these were supported by potential targets to be met. The SA objectives were informed by other relevant plans, strategies or sustainability objectives that may influence, or be influenced by, the District Plan. Further details on how the SA Framework was developed are presented in the *SA Scoping Report*. Table 2.14 identifies the SA Objectives and indicators developed by Bromsgrove DC.

### **2.6 Social Sustainability Objectives**

- SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs, in clean, safe and pleasant local environment.
- SO2 To improve the health and well-being of the population and reduce inequalities in health
- SO3 Improve the vitality and viability of Town Centres, other centres and communities and quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio economic status or educational attainment
- SO4 Reduce crime, fear of crime and anti- social behaviour
- SO5 Increase sustainable travel choices and move towards more sustainable travel patterns
- SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community

## 2.7 Environmental Sustainability Objectives

- EV1 To conserve and enhance biodiversity and geodiversity
- EV2 Ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.
- EV3 Safeguard and strengthen landscape and townscape character and quality
- EV4 Conserve, protect and enhance the architectural, cultural and historic environment, heritage and seek well-designed, high quality built environment in new development proposals
- EV5 To manage waste in accordance with the waste hierarchy, 1) Prevention, 2) Preparing for reuse, 3) Recycling, 4) Other recovery, 5) Disposal

- EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas.
- EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources.
- EV8 Protect and enhance the quality of water, soil and air
- EV9 Reduce causes of and adapt to the impacts of climate change.

## 2.8 Economic Sustainability Objectives Matrix

- EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural
- EC2 Promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives.
- EC3 To raise the skills levels and qualifications of workforce and quality of education opportunities for all

## 2.9 **The Appraisal Matrix**

2.10 The appraisal matrix presented in Table 2.13 will be used to assess each of the District Plan policies. Each policy will be assessed against each of the SA objectives, using the indicators as benchmarks.

Through adopting this approach, the following will be considered:

- Impact. Whether the effect of the effect is positive, negative or neutral when assessed against the objectives
- Significance. Whether the effect would be slightly or greatly significant

2.11 The direction and severity of the effects are described in the SA matrix using the following notation:

++ = Major Positive Impact



- + = Positive Impact
- 0 = No Impact / Neutral
- = Negative Impact
- = Major Negative Impact
- ? = Uncertain impact – more information required

This notation is explained further in Table 2.12.

**Table 2.12 Explanation of Matrix Notation**

Alignment	Description	Symbol
Major Positive Impact	The proposed policy contributes significantly to the achievement of the objective	++
Positive Impact	The proposed policy contributes to the achievement of the objective but not significantly	+
No Impact/ Neutral	There is no clear relationship between the proposed development and/or the achievement of the objective or the relationship is negligible	0
Negative Impact	The proposed policy detracts from the achievement of the objective but not significantly	-
Major Negative Impact	The proposed development detracts significantly from the achievement of the objective	--
Uncertain impact – more information required	The proposed policy either has both a positive and negative relationship to the objective or the relationship is dependant on the way in which the aspect is managed. Insufficient information may be available to enable an assessment to be made.	?

**Table 2.13 Example Assessment Matrix**

BDP X		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and		

BDP X		
SA Objectives	SA Effects	Commentary
pleasant local environment		
SO2 To improve the health and well-being of the population and reduce inequalities in health		
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment		
SO4 Reduce crime, fear of crime and anti-social behaviour		
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns		

**Table 2.14: SA Objectives and Indicators**

SEA Directive Topics	SA Objectives	Key Indicators
Population	SO1 - Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	<ul style="list-style-type: none"> <li>▪ Meeting of affordable housing requirements in housing needs survey</li> <li>▪ Number of affordable housing delivered by levels of the Code for Sustainable Homes standard</li> </ul>
Human Health	SO2 - To improve the health and well-being of the population and reduce inequalities in health	<ul style="list-style-type: none"> <li>▪ Percentage of population describing their health as good.</li> <li>▪ Percentage of residents with limiting long term illness.</li> <li>▪ Life expectancy</li> <li>▪ Number of new homes within 800m of a GP surgery</li> <li>▪ Number of new homes achieving Lifetime Homes Standard</li> <li>▪ Number of new homes within 800m of Public Rights of Way</li> </ul>

SEA Directive Topics	SA Objectives	Key Indicators
Population Human Health	SO3 - Improve the vitality and viability of Town Centre, other centres and communities and quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	<ul style="list-style-type: none"> <li>▪ Number of parks and areas of recreational space</li> <li>▪ Number of sports pitches per 1000 population</li> <li>▪ Number of new homes within 800m of a Post Office, shops and a primary school in rural areas</li> <li>▪ Number of new homes within 800m of a bus stop/ railway station with frequent bus service (e.g. at least 6 buses a day) to a local/ district/ town centre?</li> </ul>
Population Human Health	SO4 - Reduce crime, fear of crime and anti social behaviour	<ul style="list-style-type: none"> <li>▪ Number of recorded crimes per 1000 population</li> <li>▪ % of population who fear crime</li> <li>▪ Types of crime recorded</li> <li>▪ Number of recorded Anti social behaviour</li> </ul>
Human Health Climate Factors Material Assets	SO5 - Increase sustainable travel choices and move towards more sustainable travel patterns	<ul style="list-style-type: none"> <li>▪ People's usual method of travel to work by mode and % (walk, cycle, bus, train, car)</li> <li>▪ Number of new homes within 800m of a bus stop/ railway station with frequent bus service (e.g. at least six buses a day)</li> </ul>

SEA Directive Topics	SA Objectives	Key Indicators
Population Human Health	SO6 - To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	<ul style="list-style-type: none"> <li>▪ Satisfaction with provision of local authority services for example, to be measured by the number of complaints</li> </ul>
Biodiversity Fauna Flora Soil	EV1 - To conserve and enhance biodiversity and geodiversity	<ul style="list-style-type: none"> <li>▪ % of SSSI's in favourable condition</li> <li>▪ Number of Local Sites (wildlife and geological)</li> <li>▪ Number of applications that contribute towards the Biodiversity Action Plan and Geological Action Plan</li> <li>▪ Number of applications granted permission contrary to the advice of Natural England, Worcestershire Wildlife Trust, or Herefordshire and Worcestershire Earth Heritage Trust</li> <li>▪ Number of applications participated in the Biodiversity Offsetting scheme/ equivalent</li> </ul>
Material Assets	EV2 - Ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	<ul style="list-style-type: none"> <li>▪ % of District covered by Green Belt</li> <li>▪ Major applications granted permissions in the Green Belt</li> <li>▪ % of development on brownfield land / buildings</li> <li>▪ Number of developments granted permission on land that has a high possibility of being the best and most versatile agricultural land.</li> </ul>

SEA Directive Topics	SA Objectives	Key Indicators
Landscape	EV3 - Safeguard and strengthen landscape and townscape character and quality	<ul style="list-style-type: none"> <li>▪ Number of applications that achieve landscape gain in accordance to the Landscape Character Assessment</li> </ul>
Cultural Heritage	EV4 - Conserve, protect and enhance the architectural, cultural and historic environment, heritage and seek well designed, high quality built environment in new development proposals	<ul style="list-style-type: none"> <li>▪ Total number of listed buildings</li> <li>▪ Total number of Conservation areas</li> <li>▪ Number and % of Listed Buildings 'at risk' (all grades)</li> <li>▪ Number and % of Scheduled Monuments 'at risk'</li> <li>▪ Number and % of Registered Parks and Gardens 'at risk'</li> <li>▪ Number and % of Conservation Areas 'at risk'</li> <li>▪ Number and % of Places of Worship 'at risk'</li> <li>▪ Number of historic buildings repaired and brought back into use</li> <li>▪ Area of highly sensitive historic landscape characterisation type(s) which have been altered and their character eroded</li> <li>▪ Number of major development projects that enhance the significance of heritage assets or historic landscape character</li> <li>▪ Number of major development projects that detract from the significance of heritage assets or historic landscape character</li> </ul>

SEA Directive Topics	SA Objectives	Key Indicators
		<ul style="list-style-type: none"> <li>▪ Improvements in the management of historic and archaeological sites and features</li> <li>▪ Number of planning applications received for work in conservation areas and on listed buildings</li> <li>▪</li> </ul>
Climate Factors Material Assets	EV5 - To manage waste in accordance with the waste hierarchy 1) Prevention, 2) Preparing for reuse, 3) Recycling, 4) Other recovery, 5) Disposal	<ul style="list-style-type: none"> <li>▪ % of waste disposal to landfill</li> <li>▪ % of waste recycled per annum</li> <li>▪ Household waste collection per annum</li> </ul>
Water Climate Factor	EV6 - Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	<ul style="list-style-type: none"> <li>▪ Number of planning permissions granted contrary to the advice of Environment Agency, the Lead Local Flood Authority or Internal Drainage Board</li> <li>▪ Number of applications approved by the SuDS Approval Body</li> </ul>
Climate Factors Material Assets Air	EV7 - Promote resource efficiency and energy generated from renewable energy and low carbon sources	<ul style="list-style-type: none"> <li>▪ Local CO2 emission estimates per capita</li> <li>▪ Number of new homes by levels of the Code for Sustainable Homes and number of non-domestic buildings by grades of BREEAM</li> <li>▪ Number of renewable energy applications granted permission and their capacity</li> </ul>

SEA Directive Topics	SA Objectives	Key Indicators
Soil Water Air	EV8 - Protect and enhance the quality of water, soil and air	<ul style="list-style-type: none"> <li>▪ Number of applications approved by the SuDS Approval Body % of watercourses within the District that meet the targets set in the Water Framework Directive</li> <li>▪ % of contaminated land in District</li> <li>▪ No of AQMAs in District</li> </ul>
Climate Factors	EV9 - Reduce causes of and adapt to the impacts of climate change.	<ul style="list-style-type: none"> <li>▪ Number of homes by levels of the Code for Sustainable Homes and number of non-domestic buildings by grades of BREEAM.</li> <li>▪ Number of developments incorporating on site renewable energy</li> <li>▪ Local CO2 emission estimates per capita</li> <li>▪</li> </ul>
Population	EC1 - Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	<ul style="list-style-type: none"> <li>▪ Proportion of population educated to degree standard or higher</li> <li>▪ Qualifications at age 19</li> <li>▪ 16 year olds with no qualifications</li> <li>▪ % of working age unemployed by ward</li> <li>▪ Number of VAT registered businesses</li> <li>▪ Survival rates for VAT registered businesses</li> <li>▪ Number of wards with SOA's in the bottom 25% for education, skills and training deprivation</li> </ul>



SEA Directive Topics	SA Objectives	Key Indicators
Climate Factors Material Assets	EC2 - Promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	<ul style="list-style-type: none"> <li>▪ % employment by industry sector</li> </ul>
Population	EC3 - To raise the skills levels and qualifications of workforce and quality of education opportunities for all	<ul style="list-style-type: none"> <li>▪ Proportion of population educated to degree standard or higher</li> <li>▪ Qualifications at age 19</li> <li>▪ 16 year olds with no qualifications</li> <li>▪ Number of wards with SOA's in the bottom 25% for education, skills and training deprivation</li> </ul>

### **3 Assessment of Effects and Mitigation**

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#### **3.1 Introduction**

3.2 This section presents the findings of the assessment of the District Plan policies. The appraisal matrices are presented in Appendix A, and a summary description of the key findings given below.

3.3 The SEA Directive also requires an assessment to be made of the do nothing or business as usual situation in the District without the implementation of the new District Plan. This is addressed in the section below.

#### **3.4 Assessment of 'No District Plan' Scenario**

3.5 Guidance provided states that the SA should aim to improve on the effects of the existing saved plan, and to test this, options such as 'no plan' and 'business as usual' should be explored. In this case, these (in reality unlikely) scenarios have been deemed to constitute a continuation of the current saved policies identified in the existing Local Plan through to the end of its life, after which there would be no local planning intervention and things would follow a reactive planning approach.

3.6 In the short term, a continuation of the current baseline trends would be likely, seeing that those trends would have been influenced by current planning policy. The NPPF would apply and in particular the presumption in favour of sustainable development. It is considered that current issues would continue, for example:

- Barriers to housing and services in rural areas;
- Continued fear of crime;

- Increased pressure for development in the Green Belt;
- Under-provision of affordable housing;
- High car usage and congestion;
- Significant out-commuting;
- Imbalance of service provision to population size; and
- Localised poor air quality relating to motorway network.

3.7 The role of statutory consultees such as the Natural England, Environment Agency, and English Heritage would still enable environmental enforcement and controls to continue along with their active roles in planning applications. However, this would be a far less pro-active approach without a forward thinking, sustainable planning strategy in place. Without pro-active intervention, the aims of sustainable social, economic and environmental regeneration are unlikely to be given enough impetus to be realised. A long-term reactive approach to development would result in sustainability impacts being highly uncertain as much would depend upon free-market forces.

### **3.8 Assessment of Effects of Draft Policies and Proposed Mitigation Measures**

#### **BDP1 Sustainable Development Principles**

**BDP1.1** When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

**BDP1.2** Planning applications that accord with the policies in this District Plan and where relevant, with policies in

neighbourhood plans will be approved without delay, unless material considerations indicate otherwise.

**BDP1.3** Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- a) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- b) Specific policies in that Framework indicate that development should be restricted as stated in footnote 9 of paragraph 14 of the NPPF. For example, those policies relating to sites designated as Sites of Special Scientific Interest; remaining land designated as Green Belt, Local Green Space, designated heritage assets and locations at risk of flooding.

**BDP1.4** In considering all proposals for development in Bromsgrove District regard will be had to the following:

- a) Accessibility to public transport options and the ability of the local road network to accommodate additional traffic;
- b) Any implications for air quality in the District and proposed mitigation measures;
- c) The cumulative impacts on infrastructure provision;
- d) The quality of the natural environment including any potential impact on biodiversity, landscape and the provision of/and links to green infrastructure (GI) networks<sup>6</sup>;
- e) Compatibility with adjoining uses and the impact on residential amenity;
- f) The impact on visual amenity;
- g) The causes and impacts of climate change i.e. the energy, waste and water hierarchies, flood risk and future proofing;
- h) The provision of communication technology infrastructure to allow for future technological enhancements e.g. fibre optic ducting;
- i) The impact on the historic environment and the significance of heritage assets and their setting;
- j) Financial viability and the economic benefits for the District, such as new homes and jobs.

### **3.9 Key Policy Strengths**

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<sup>6</sup> see GI policy BDP 24 and glossary

- 3.10 The policy provides a number of social benefits as the importance of access is clearly highlighted. This means new development should be in locations that are well served by public transport meaning residents should have access to a full range of services which should reduce social exclusion.
- 3.11 The increased use of public transport should also reduce car usage which could lead to a reduction in carbon emissions and an improvement in air quality with resultant environmental benefits and social gains in terms of health.
- 3.12 The policy makes clear reference to the importance of biodiversity, green infrastructure and the historic environment meaning that there should be a positive impact on objectives EV1, EV2, EV3 and EV4.
- 3.13 The emphasis on improving economic conditions could help to create jobs and potentially stimulate development in high technology sectors.

### **3.14 Key Policy Weaknesses**

- 3.15 No weaknesses have been highlighted against the sustainability objectives.

### **3.16 Recommendations for Mitigation**

- 3.17 None

## **BDP 2 Settlement Hierarchy Policy**

**There will be four main facets to the delivery of housing in Bromsgrove District consisting of the following:**

- 1. Development of previously developed land or buildings within existing settlement boundaries which are not in the designated Green Belt**
- 2. Expansion Sites around Bromsgrove Town (as identified in BDP 5A)**
- 3. Development Sites in or adjacent to large settlements(as identified in BDP 5B)**
- 4. Exceptionally, affordable housing will be allowed in or on the edge of settlements in the Green Belt where a proven local need has been established through a comprehensive and recent survey and where the choice of site meets relevant planning criteria. Where viability is a concern the inclusion of other tenures within a scheme may be acceptable where full justification is provided. Where a proposed site is within the boundaries of a settlement, which is not in the Green Belt, a local need for housing would not need to be justified**

**Proposals for new development should be located in accordance with the District's settlement hierarchy as shown in the table below. This will ensure that development contributes to the**

regeneration priorities for the area, preserves the attractiveness of the environment, reduces the need to travel and promotes sustainable communities based on the services and facilities that are available in each settlement and will assist villages to remain viable and provide for the needs of the catchment population that they serve.

<b>Settlement type</b>	<b>Name</b>	<b>Suitable development</b>
<b>Main Town (population circa 30,000)</b>	<b>Bromsgrove</b>	<b>Comparison and convenience retail (to meet District requirements and needs) Commercial leisure- restaurants, cafes pubs and bars Office Residential development of a scale proportional to the sustainability of the settlement. Hotels/guest houses Employment Leisure/culture ie churches, health centres, libraries, public halls etc Major services</b>
<b>Large 'Settlement' (population circa 2500- 10,000)</b>	<b>Alvechurch Barnt Green Catshill Hagley Rubery Wythall</b>	<b>Convenience A1 retail (to meet needs of the specific village) Local services Residential development of a scale proportional to the sustainability of the settlement. Small scale business/office development</b>
<b>Small 'Settlement' (population circa 50-2500)</b>	<b>Belbroughton<sup>7</sup> Blackwell Cofton Hackett Romsley Stoke Prior Adams Hill Beoley Bournheath Burcot Clent Dodford</b>	<b>Housing to meet local needs (through rural exception sites in appropriate circumstances). Where a proposed site is within the boundaries of a settlement, which is not in the Green Belt, a local need for housing would not need to be justified. Local services Small scale rural employment in appropriate circumstances. More limited local services for</b>

<sup>7</sup> Villages highlighted in blue are subject to a village envelope

	<b>Fairfield          Finstall          Holy Cross          Hopwood          Lower Clent          Rowney          Green</b>	<b>example, local convenience          shop/post office or public          house.</b>
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5. **The Settlement Hierarchy outlined above will provide the guiding principles in terms of sustainability for the proposed Green Belt Review sequential testing.**
6. **The ‘village envelope’ ie the defined settlement boundary for a village, is identified on the Policies Map and will remain unaltered until a review of the Green Belt is undertaken. Within the village envelope appropriate development will be limited to suitable infill plots. This applies to the following villages; Adams Hill, Belbroughton, Beoley (Holt End), Bournheath, Burcot, Clent, Fairfield, Finstall, Holy Cross, Hopwood, Lower Clent, Romsley and Rowney Green.**

### **3.18 Key Policy strengths**

- 3.19 The settlement hierarchy focuses in the first instance on the largest settlements and then secondly on settlements with needs and facilities to accommodate an appropriate level of growth.
- 3.20 It does not advocate development in unsustainable locations which would result in unreasonable travelling distances and which may require additional and potentially wasteful infrastructure needing to be provided to support such development.
- 3.21 A limited amount of growth in the smaller settlements will contribute towards the survival of such areas and support local services continuing to be provided potentially reducing unsustainable travel movements.
- 3.22 It is important that housing is delivered in the most sustainable way possible. In the first instance this means delivering housing on brownfield sites within existing settlement boundaries. Unfortunately the amount of brownfield land identified within the Strategic Housing Land Availability Assessment (SHLAA) that is currently suitable and available for development is insufficient to meet locally identified housing targets. This means that greenfield sites will need to be released immediately to achieve a 5 year supply of housing. This will initially be achieved through the allocation of strategic sites in Bromsgrove Town within the Bromsgrove District Plan.

- 3.23 These strategic sites alone will not be sufficient to maintain a 5 year supply throughout the plan period. Other greenfield sites will need to come forward that are highlighted in the SHLAA. This will enable some growth to occur in the large villages to enhance vitality and meet demand and need for housing within the District. Whilst the majority of development will occur in the larger settlements there will opportunities for small affordable housing schemes in rural settlements that meet local needs.
- 3.24 The location of housing growth is an important issue for many environmental, social and economic reasons as the choice of location can have direct and indirect effects on a number of other issues. The policy highlights that significant growth will occur in and around Bromsgrove Town which is the most sustainable location with good access to existing services, facilities and infrastructure.
- 3.25 Enabling growth in Bromsgrove Town will encourage additional inward investment in the town and can be a catalyst for development in other areas such as employment and retail. This would also result in the social and economic benefits within Bromsgrove Town Centre such as housing provision, accessible services, reduction in poverty, vibrant communities.
- 3.26 The policy promotes development primarily in the larger urban settlements which are the most accessible and densely populated area of the District enabling the largest proportion of residents to be able to access services and employment, thereby helping to reduce poverty and social exclusion in those areas.
- 3.27 The larger settlements are better connected by public transport and the proximity of people to jobs and services might encourage walking and cycling instead of private car use, which may result in a decrease in traffic congestion and air pollution. It is important that non-car based transport is also encouraged.

### **3.28 Key Policy Weaknesses**

- 3.29 Whilst the policy promotes development on previously developed land there is a recognition that the levels of suitable brownfield land are limited and therefore a significant percentage of housing growth will occur on greenfield sites. This could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality.
- 3.30 The presumption of development in favour of urban areas has the potential to adversely impact upon the historic urban environment, although this would entirely depend upon exactly where and how sites



were developed. In contrast, enhancement of an historic setting may occur as a result of development.

- 3.31 The NPPF discourages development in the floodplain and this principle should be addressed in the Plan. The location of development will have an impact on flood risk but can be addressed on site by site basis through the use of measures such as SuDS.

### 3.32 Recommendations for Mitigation

- 3.33 Whilst the focus of development on previously developed sites in urban areas is positive, ways should be sought to ensure that biodiversity in urban areas is maintained. Also urban greenspace has many benefits and this should not be compromised by the presumption to develop in urban areas.
- 3.34 Urban areas in Bromsgrove can contain a rich heritage resource. It is important that new development in these areas compliments historic buildings and sites.
- 3.35 The uptake of SuDS is important in new development in urban areas, especially as flooding induced by surface run-off is an existing issue in the District.
- 3.36 Where greenfield land has to be lost to accommodate growth a hierarchy approach should generally be used to protect the best agricultural land and land with higher landscape character.

### BDP3 Future Housing and Employment Growth

<b>BDP1 Development Targets</b>		
<b>BROMSGROVE</b>		
<b>Type of development</b>	<b>Target</b>	<b>Timescale</b>
<b>Dwellings outside Green Belt</b>	4,600	2011-2023
<b>Green Belt Review</b>	2,400	2023-2030
<b>employment land in hectares (ha)</b>	28ha	2011-2030
<b>REDDITCH</b>		
<b>Type of development</b>	<b>Target</b>	<b>Timescale</b>
<b>dwelling units</b>	3400	2011-2030

**BDP3.1** It is proposed that prior to 2023 a full Green Belt Review will have been completed and further sites will have been allocated to contribute approximately 2,400 dwellings towards the 7,000 target.

**BDP3.2** The immediate release of Bromsgrove Town Expansion Sites and Other Development Sites is promoted in BDP5 with development expected throughout the plan period.

**BDP3.3** The Council will seek to maintain a 5 year supply of deliverable sites plus an additional buffer of 5% moved forward from later in the plan period (or 20% where there has been persistent under delivery of housing). Annual monitoring will be used to identify the required rate of housing delivery for the following five year period, based on the remaining dwellings to meet overall requirements. When a five year supply has been achieved the Council will consider whether granting permission would undermine the objectives of this strategy.

### **3.37 Key Policy strengths**

3.38 The amount of housing and employment growth is an important issue for environmental, social and economic reasons. The amount of growth allocated in Bromsgrove up to 2030 will be an important determining factor in location terms.

3.39 The policy seeks to strike a balance between environmental, social and economic factors. The SHLAA identifies that initially development will take place on brownfield sites and ADRs. This process will ensure that no Green Belt land will be required, until approximately 2023 in relation to Bromsgrove related growth. It also supports the principle of rural and urban renaissance, by focusing on the local needs of Bromsgrove, out migration from the conurbation is curbed and conversely encouraging the efficient use of (usually) brownfield land in the conurbation and hence urban renaissance.

3.40 Whilst it is recognised that the policy does not fully accommodate social needs in terms of affordable housing it attempts to go some way towards meeting this figure whilst striking a balance with other factors. The concentration of development in sustainable locations also may result in economies of scale and may prove as a catalyst for new or improved infrastructure and hence quality of life for residents.

3.41 Thus all factors are inextricably linked and of mutual benefit. The substantial amount of development has the potential to provide new accommodation which is future proofed to the effects of climate change.

3.42 Furthermore new employment development will be an obvious benefit in economic terms through the creation of new jobs and the potential for development in high technology sectors.

### **3.43 Key policy weaknesses**

- 3.44 As aforementioned the amount of housing is closely linked to the location of development. Therefore the weaknesses of the policy are also set out in the SA relating to BDP5A, BDP5B and RCBD1.
- 3.45 The policy will not totally address affordable housing needs.
- 3.46 The substantial amount of development proposed has the potential, if not properly designed and managed, to contribute towards the adverse impacts of climate change such as flooding. It also involves the development of greenfield and Green Belt land which could have environmental implications.
- 3.47 Mitigation measures**
- 3.48 The review period at 2023 may enable further development to come forward provided this can be done in a sustainable manner and this has the potential to further address the supply of affordable housing.
- 3.49 Measures to manage surface water run-off will therefore need to be embedded in policies such as the use of SuDS, permeable paving, use of green roofs and rainwater harvesting.
- 3.50 The development of Greenfield and Green Belt land is unavoidable due to the limited supply of brownfield land. Stringent criteria will need to be applied when undertaking the Green Belt Review to ensure that land of low environmental value is identified where possible.

#### **BDP 4 Green Belt**

**BDP4.1 The general extent of the Green Belt as indicated on the Policies Map will only be maintained as per BDP 4.2.**

**BDP4.2 A Local Plan Review including a full Review of the Green Belt will be undertaken in advance of 2023 to identify:**

- a) Sufficient land in sustainable locations to deliver approximately 2,400 homes in the period 2023-2030 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 and adjacent authorities based on the latest evidence ; and**
- c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period ie. up to 2030.**

**BDP4.3 The Green Belt boundary review will follow the approach in BDP2 Settlement Hierarchy and take into account any proposals in Neighbourhood Plans. Where appropriate, settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development.**

**BDP4.4** The development of new buildings in the Green Belt is considered to be inappropriate, except in the following circumstances:

- a) Buildings for agriculture and forestry;
- b) Appropriate facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it;
- c) Extensions to existing residential dwellings up to a maximum of 40% increase of the original dwelling or increases up to a maximum total floor space of 140m<sup>2</sup>;
- d) Proportionate extensions to non-residential buildings taking into account the potential impact on the openness and the purposes of including the land in Green Belt. Proposals that can demonstrate significant benefits to the local economy and/or community will be considered favourably;
- e) The replacement of a building, built with the intention of being permanent, provided the new building is in the same use and should not be materially larger than the original building;
- f) Limited infilling in Green Belt settlements and rural exception sites in accordance with BDP 9 Rural Exception Sites;
- g) Limited infilling or the partial or complete redevelopment of previously developed sites that would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

### **3.51 Key Policy Strengths**

3.52 This policy performs strongly in relation to social and environmental objectives. The proposed Green Belt Review will ensure the delivery of further affordable housing and enable development to occur in locations where there is good access to services, facilities and public transport.

3.53 The Green Belt offers many opportunities for informal/formal recreation and therefore its protection and accessibility to it, is important to maintain the uptake of recreational facilities which can help to improve the health of the local population but it can also add to the well-being and vibrancy of communities through creating an improved living environment. It is also a strong policy in relation to protection of biodiversity/ geodiversity and landscape character, the latter of which may have a historic aspect.

### **3.54 Key Policy Weaknesses**

3.55 The policy will result in the loss of some Green Belt when the Review of the Green Belt is undertaken. However, this is necessary to ensure that housing needs are met.

### **3.56 Recommendations for Mitigation**

3.57 None

#### **BDP5A) Bromsgrove Town Expansion Sites policy**

**BDP5A.1** The mixed use urban extension is proposed across three sites that will create a sustainable and balanced community that integrates into the existing residential areas of Bromsgrove. The development will fully address the social, economic and environmental aspects of sustainable development and will consist of approximately 2106 dwellings, 5 hectares of employment land, local centre(s), retail and community facilities.

**BDP5A.2** Of this total allocation BROM1 will include a minimum of 316 dwellings and associated community infrastructure that should include public open space with play facilities.

**BDP5A.3** BROM2 will contain a minimum of 1300 dwellings, 5 hectares of local employment land (office and/or light industry), a local centre and community facilities.

**BDP5A.4** A local centre should also be provided on BROM2 that provides a mix of retail and other A class uses. The local centre should be located adjacent to Sidemoor First School, include sufficient parking to cater for its own needs and also the school at busy times and amenity green space should also be provided.

**BDP5A.5** The community facilities should consist of a community hall, large equipped play areas, sports pitches and an allotment site. There is a specific requirement for adult football pitches adjacent to the King George V playing fields and associated infrastructure including access, parking and changing facilities should also be provided.

**BDP5A.6** BROM3 will include a minimum of 490 dwellings and associated community infrastructure that should include public open space with play facilities and small scale local retail.

**BDP5A.7** It is required that:

- i.** The residential development reflects the local need of a high proportion of 2 and 3 bedroom properties and contains up to 40% affordable housing (which should include an appropriate mix of social rent, affordable rent and intermediate housing);
- ii.** To address the housing needs of the elderly all dwelling should seek to achieve Lifetime Home Standards and BROM2 should contain an 'extra care' type facility of approximately 200 units;
- iii.** An overall transport strategy will be developed that maximises opportunities for walking and cycling making full use of the

- Sustrans route No. 5 (in BROM2) and Monarch's Way (adjacent to BROM3);
- iv. Significant improvements in passenger transport will be required including integrated and regular bus services connecting the new and existing residential areas to the railway station, with the Town Centre as the focal point of the network. In particular, a regular service should be routed through BROM2 and into the residential area of Sidemoor which would provide benefits for the wider community;
  - v. It will be necessary to manage the cumulative traffic impact generated by the new developments following the implementation of measures which maximise the use of walk, cycle and passenger transport modes. All proposals must be subject to appropriate appraisal in consultation with Worcestershire County Council and consistent with LTP3 policies and design standards. Full consideration must be made of the impact on the wider transport network, including that managed by the Highways Agency;
  - vi. Noise and air pollution emanating from the M5 and M42 will need to be addressed ensuring that sensitive land uses and the AQMA at junction 1 of the M42 are not unduly impacted upon;
  - vii. All development must be of a high quality and locally distinctive to Bromsgrove, thereby enhancing the existing character and qualities that contribute to the town's identity and create a coherent sense of place. There should be a continuous network of streets creating a permeable layout and the use of continuous building lines to help define streets;
  - viii. The development will need to reflect the topography of the sites, with built form avoiding the prominent ridgelines on both BROM1 and BROM3;
  - ix. The sites will have an overall strategy for green infrastructure (incorporating SuDS and blue infrastructure) that maximises opportunities for biodiversity and recreation throughout, creating a green corridor around the Battlefield Brook (BROM2) and in the case of BROM3, links to Sanders Park;
  - x. Important biodiversity habitats and landscape features should be retained and enhanced with any mitigation provided where necessary. There should be no net loss of hedgerow resource within the sites. Full account should be taken of protected and notable species (e.g badgers, reptiles, water voles and bats);
  - xi. Flood risk from the Battlefield Brook on BROM2 and BROM3 should be addressed through flood management measures to protect and enhance the District's watercourses and enable development appropriate to the flood risk; and surface water run off must be managed to prevent flooding on and around all of the sites through the use of SuDS<sup>8</sup>. In accordance with the objectives of the Water Framework Directive, development should ideally enhance, or at least not worsen, water quality;

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<sup>8</sup> Some SuDS will need to be approved by the Science Advisory Board (SAB)

- xii. Sewerage capacity issues will be satisfactorily addressed in Bromsgrove Town through engagement with both Severn Trent Water Ltd and the Environment Agency;**
- xiii. The developments should seek to incorporate zero or low carbon energy generation technologies e.g Combined heat and power, ground source heat pumps and/or solar power; and**
- xiv. Financial contributions for infrastructure provision will be required as detailed in BDP6 Infrastructure Contributions.**

### **3.58 Key Policy Strengths**

- 3.59 The policy allocates 3 expansion sites around the north and west of Bromsgrove Town. These sites are in sustainable locations with good access to existing services, facilities and infrastructure. A number of other benefits will be created including the provision of a wide range of housing to meet local needs including affordable housing and accommodation suitable for elderly.
- 3.60 The expansion sites in Bromsgrove Town will provide a full range of services and facilities on site so it will be possible to reduce people's need to travel and lead to a reduction in car journeys which will provide environmental benefits. The policy also seeks improvements in public transport which should lead to an increase in the number of bus passengers and increased accessibility by sustainable means result in social benefits such as improvements in quality of life and tackling social exclusion.
- 3.61 The policy highlights that an element of employment development will be provided on the expansion sites which will encourage additional inward investment in the town which could be a catalyst for development in other areas such as employment and retail and potentially have a knock-on effect on the town centre.
- 3.62 The policy seeks to provide benefits in terms of addressing climate change by highlighting the need to follow the waste hierarchy and also the use of renewable energy on the development. It also has a number of environmental benefits in terms of protection of habitats and strengthening green infrastructure.

### **3.63 Key Policy Weaknesses**

- 3.64 Bromsgrove Town has very limited levels of brownfield land and therefore all of the expansion sites are on greenfield land. This could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality. A detailed site selection process has been undertaken and these are considered to be the most suitable sites around the Town.

- 3.65 The development sites have the potential to impact on environmental issues such as flooding, air and water quality and biodiversity. However, the policy sets clear parameters to ensure that there are no negative impacts by protecting habitats, retaining hedgerows and seeking improvements wherever possible.
- 3.66 The NPPF discourages development in the floodplain and this principle should be taken forward through the planning system. The location of development will have an impact on flood risk but this can be addressed through the use of measures such as SUDS.
- 3.67 Recommendations for Mitigation**
- 3.68 A masterplan should be developed to supplement the policy for the expansion sites to provide a greater level of detail on issues such as biodiversity to ensure that there are benefits for protected species and all important natural features are retained or enhanced. This should also include a clear strategy for green infrastructure.

#### **BDP5 B) Other Development Sites Policy**

**BDP5B Table 3 highlights development sites which will contribute to housing needs in Bromsgrove District for the period 2011-2030. The table identifies the potential capacities on each site and sites which have already received planning permission.**

**Table 3 Scale of Development**

<b>Development Sites</b>	<b>Map No.</b>	<b>Area (hectares)</b>	<b>Suitable use</b>	<b>Potential capacity</b>	<b>Received permission</b>
<b>Alvechurch</b>					
<b>Land Adjoining Crown Meadow</b>	<b>2</b>	<b>0.6</b>	<b>housing</b>	<b>27</b>	<b>27</b>
<b>Birmingham Road/ Rectory Lane</b>	<b>2</b>	<b>1.06</b>	<b>housing</b>	<b>25</b>	<b>25</b>
<b>Barnt Green</b>	<b>3</b>	<b>5</b>	<b>housing</b>	<b>88</b>	<b>88</b>
<b>Catshill</b>	<b>4</b>	<b>6.04</b>	<b>housing</b>	<b>80</b>	<b>80</b>
<b>Frankley</b>	<b>9</b>	<b>6.6</b>	<b>open space/housing</b>	<b>66<sup>9</sup></b>	<b>-</b>
<b>Hagley</b>	<b>5</b>	<b>21.9</b>	<b>mixed use<sup>10</sup> - community leisure/employment/residential</b>	<b>301<sup>11</sup></b>	<b>273</b>

<sup>9</sup> The site has some protection in terms of open space and also has restrictive covenants which limit its use and developable area.

<sup>10</sup> As combined area of sites is significantly greater than other areas, a mixed use development here is considered a more sustainable option. Sites could be developed in various proportions for community leisure, employment and residential uses.



Ravensbank expansion site (for Redditch's needs)	8	10.3	employment	-	-
Wagon works/St Godwalds Road	6	7.8	housing	181	181
Wythall					
Selsdon Close	7	3.1	housing	76	76
Bleakhouse Farm	7	6.3	housing	178	178
<b>Totals</b>		<b>68.7</b>		<b>1022</b>	<b>938</b>

3.69 A Sustainability Appraisal has been carried out for each site identified within Table 3 and can be found in appendix C. As this Policy only references this table, for land supply reasons, a specific SA for this policy is not considered necessary.

#### **RCBD1.1 Redditch Cross Boundary Development**

**RCBD1.6 Two mixed use urban extensions are proposed (as shown on Map RCBD1 X) across two sites adjacent to Redditch and are appropriate to deliver a minimum of 3400 dwellings and comprehensive provision of associated new infrastructure to meet some of Redditch's housing requirements up to 2030.**

**RCBD1.7 Site 1 Foxlydiat will include a minimum of 2800 dwellings, a first school and a Local Centre, including associated community infrastructure.**

**RCBD1.8 Site 2 Brockhill will contain a minimum of 600 dwellings which will integrate with the Strategic Site at Brockhill East, as shown in the Redditch Local Plan No.4 and should integrate well into the existing urban fabric of Redditch.**

**RCBD1.9 In order to achieve these sustainable new communities all aspects of the delivery of the urban extensions must be in accordance with the Policies contained within the Bromsgrove Development Plan and any other relevant Policies. In addition, it is a requirement that the following principles are applied to both sites:**

**RCBD1.10 The residential development will reflect the local requirements as detailed in the most up-to-date Housing Market**

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<sup>11</sup> Potential capacity of 301 is made up by 4 portions; 175 homes have outline planning approval, 70 dwellings outline planning approval from the Western Road portion, 38 dwellings from the appeal site at Brook Crescent and a further 18 dwellings expected on the remainder.

**Assessment and comprise of up to 40% affordable housing with a flexible mix of house types and tenures.**

**RCBD1.11 An overall Transport Assessment will be produced taking into account the cumulative and wide ranging effects of development on transport infrastructure including new and improved access arrangements, which are in keeping with the structured road hierarchy.**

**RCBD1.12 Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both Site 1 Foxlydiate and Site 2 Brockhill, with all dwellings to be located within 250m of a bus stop.**

**RCBD1.13 Walking and cycling routes should be well integrated with the Green Infrastructure Network. Site 1 Foxlydiate should make full use of existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch's Way and Site 2 Brockhill should create routes.**

**RCBD1.14 Both sites will have an overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity. Green Corridors should be created around Spring Brook in Site 1 Foxlydiate and the Red Ditch in Site 2 Brockhill. Both sites should be sensitively designed to integrate with the surrounding existing environment and landscape. In particular, development should be respectful and sympathetic to the topography of the sites, with no development on prominent ridge lines and where appropriate retain tree lined boundaries.**

**RCBD1.15 Flood risk from the Spring Brook on Site 1 Foxlydiate and the Red Ditch on Site 2 Brockhill East should be managed through measures that work with natural processes to improve the local water environment. Surface water runoff must be managed to prevent flooding on, around and downstream of the both sites through the use of Sustainable Drainage Systems (SuDS). A supporting risk assessment will be provided as SuDS techniques may be limited due to Source Protection Zones within Site 1 Foxlydiate.**

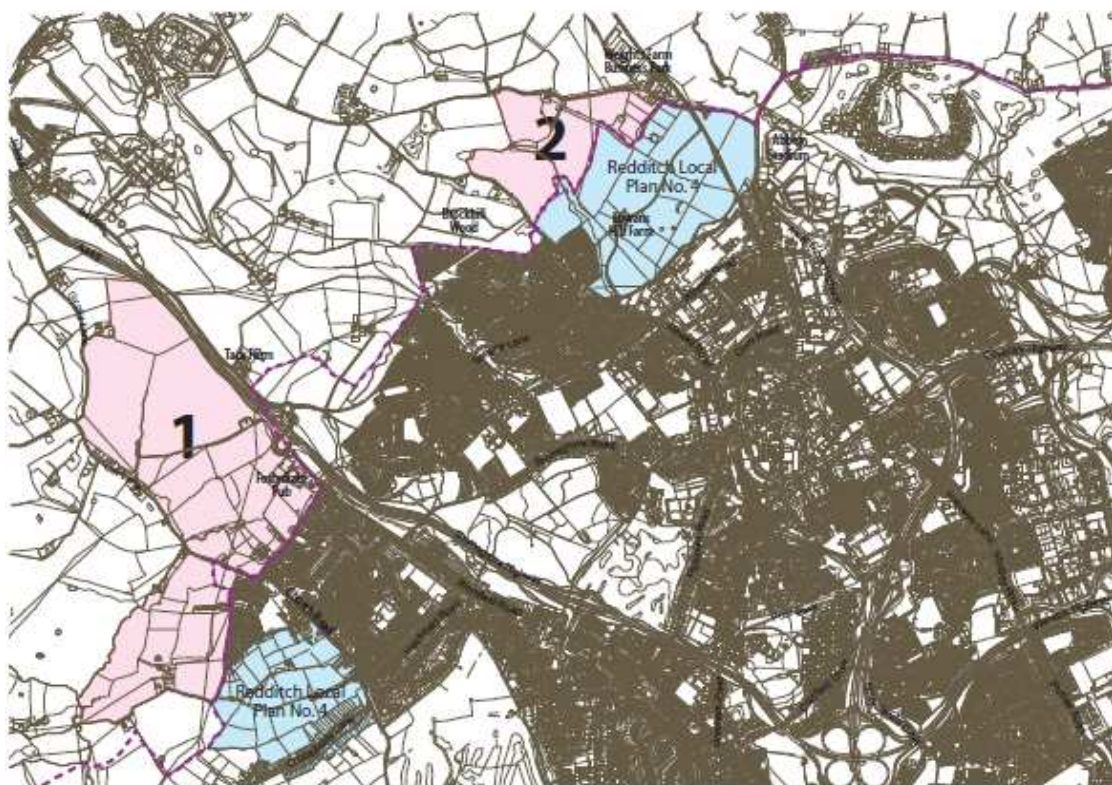
**RCBD1.16 Proposals for development will need to ensure that sufficient capacity of the sewerage systems for both wastewater collection and treatment is provided through engagement with Severn Trent Water Ltd and the Environment Agency and delivered at the appropriate stage.**

**RCBD1.17 All development must be of a high quality design and locally distinctive to its surrounding rural and urban character; contribute to the areas' identity and create a coherent sense of place; and respect and enhance the setting of any heritage asset. There should be a continuous network of streets and spaces, including the provision of public open spaces, creating a permeable layout with well-defined streets.**

**RCBD1.18 In preparing development proposals, provision should be made for any necessary infrastructure for the effective delivery of the site.**

**RCBD1.19 Any proposals for development on either site must not individually or cumulatively jeopardise the future use of any other part of the site (s) or impede the delivery of the two sustainable communities.**

**RCBD policies map (map below to be replaced with excerpt of final policies map)**



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### **3.70 Key Policy Strengths**

3.71 The policy allocates 2 expansion sites around the north and west of Redditch Town. These sites are in sustainable locations with good access to existing services, facilities and infrastructure. A number of

other benefits will be created including the provision of wide range of housing to meet local needs including affordable housing.

3.72 The expansion sites around Redditch Town will provide a wide range of services and facilities on site so it will be possible to reduce people's need to travel and lead to a reduction in car journeys which will provide environmental and social benefits. The policy also seeks improvements in public transport which should lead to an increase in the number of bus passengers and increased accessibility by sustainable means would result in social benefits such as improvements in quality of life and tackling social exclusion.

3.73 The policy also has a number of environmental benefits in terms of protection of habitats and strengthening green infrastructure. The policy emphasis on high quality design should help to achieve a built environment that can successfully integrate into Redditch.

### **3.74 Key Policy Weaknesses**

3.75 All of the land around the periphery of Redditch Town is Green Belt and agricultural land and therefore development on this type of land is unavoidable. This could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality. A detailed site selection process has been undertaken and these are considered to be the most suitable sites around the Town.

3.76 The development sites have the potential to impact on environmental issues such as flooding and biodiversity. However, the policy sets clear parameters to ensure that there are no negative impacts by wherever possible protecting habitats.

3.77 The NPPF discourages development in the floodplain and this principle should be taken forward through the planning system. The location of development will have an impact on flood risk but this can be addressed through the use of measures such as SUDS.

### **3.78 Recommendations for Mitigation**

3.79 A masterplan should be developed to supplement the policy for the cross boundary sites to provide a greater level of detail on issues such as biodiversity to ensure that there are benefits for protected species and all important natural features are retained or enhanced. This should also include a clear strategy for green infrastructure.

## **BDP6 Infrastructure Contributions**

**Development and infrastructure provision will be coordinated to ensure that growth in the District is supported by the provision of infrastructure, services and facilities needed to maintain and improve quality of life and respond to the needs of the local economy.**

**Irrespective of size, development will provide, or contribute towards the provision of:**

- **Measures to directly mitigate its impact, either geographically or functionally, which will be secured through the use of planning obligations;**
- **Infrastructure, facilities and services required to support growth which will be secured through a Community Infrastructure Levy (CIL)**

**Contributions through CIL will be required once the charging schedule has been through an independent public examination and has been formally adopted by the Council.**

### **3.80 Key Policy Strengths**

3.81 The policy focuses on ensuring that new development is adequately served by infrastructure required as part of a new sustainable development. It ensures that new development does not impact adversely on the existing community by putting added strain on existing services. The implementation of this policy could have social benefits in terms of improved education and health facilities and additional affordable housing. Financial contributions could be sought for environmental mitigation and the public realm which could benefit biodiversity and protect the historic environment. There could also be economic benefits of contributions towards skills development and education.

### **3.82 Key Policy Weaknesses**

3.83 There will be competing demands for such contributions and in an unstable economic climate profit margins become even tighter, meaning that there is less money available to render schemes viable.

### **3.84 Recommendations for Mitigation**

3.85 If circumstances arise where the viability of a scheme is compromised by the level of developer contributions it will be necessary for the applicant to demonstrate this and negotiations to proceed based on a balanced and equitable outcome. Ensuring new development is attractive and well serviced however may make an area more attractive economically.

## **BDP7 Housing Mix and Density**

**BDP7.1** Proposals for housing must take account of identified housing needs in terms of the size and type of dwellings. To ensure mixed and vibrant communities are created development proposals need to focus on delivering 2 and 3 bedroom properties. On large schemes it is accepted that a wider mix of dwelling types will be required.

**BDP7.2** The density of new housing will make the most efficient use of land whilst maintaining character and local distinctiveness and therefore should fully accord with BDP19 High Quality Design.

### **3.86 Key Policy Strengths**

3.87 With the efficient use of land encouraged, the level of greenfield development land required could be reduced, also helping to minimise landscape impact. Making the most efficient use of land will reduce the need to travel and improve the viability of local services such as corner shops. It will also help to match the family sizes of those in need of housing (primarily smaller households) with the houses developed.

3.88 Providing housing to meet the needs of local people is clearly supported by objective SO1. This policy appears to be inclusive as it targets all sections of the local population and could help integrate different groups into society and improve social well-being and community spirit.

3.89 Providing a mix of housing types and sizes will bring people from different incomes and potentially different social groups together. This can create a more vibrant and locally distinctive community. Also, producing housing that meets the local needs can minimise the chance of building the wrong types and sizes of housing that is not in demand in the local area.

### **3.90 Key Policy Weaknesses**

3.91 Making the most efficient use of land could potentially harm the historic environment in some cases.

### **3.92 Recommendations for Mitigation**

3.93 The inclusion of a reference to BDP19 High Quality Design within the policy to ensure that high quality design is achieved.

## **BDP8 Affordable Housing**

**Where there is a net increase of 10 or more dwellings or the site is equal to or greater than 0.4 hectares, affordable housing provision will be expected on-site and will be calculated against the net number of new dwellings as follows:**

- **Up to 40% affordable housing on greenfield sites or any site accommodating 200 or more dwellings;**
- **Up to 30% affordable housing on brownfield sites accommodating less than 200 dwellings**

**In exceptional circumstances where the applicant can fully demonstrate that the required target cannot be achieved the Council may negotiate a lower provision.**

**The Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking into account local needs, the housing mix in the local area and the impact on viability. A mix of the following tenures will generally be sought:**

- **Social rented;**
- **Intermediate housing; and**
- **Affordable rent**

**The affordable housing element of developments should focus primarily on the delivery of smaller units. However, there may be locations or changes in market conditions that warrant a different breakdown to deliver a scheme that best meets local needs in relation to the relevant settlement. The precise mix to be provided should be developed through discussions with the Strategic Housing Team.**

**To help meet the needs of the elderly all homes should be built to Lifetime Homes Standards in accordance with BDP10 Homes for the Elderly.**

**To create mixed and balanced communities affordable housing should be distributed throughout new developments and not be visually distinguishable from market housing.**

**When a development site is brought forward for planning consent on a piecemeal basis i.e. involving a parcel of land for development which is part of a larger site, Bromsgrove District Council will assess 'affordable housing' targets for each part of the site on a pro-rata basis having regard to the overall requirements generated by the whole site.**

### **3.94 Key Policy Strengths**

- 3.95 The assessment of this policy assumes that the policy refers purely to the provision of affordable housing within wider housing developments and therefore focuses on the 'affordability' element rather than the physical impacts of building new houses. The impacts of building housing in general are covered under other policies.
- 3.96 The policies key strength is that it will help to address the high level of need for affordable housing. Providing affordable housing is an important means of reducing social exclusion for those, largely local and younger residents on lower incomes, who cannot afford to buy houses as prices have been raised by higher income commuters working in the conurbation and living in Bromsgrove.
- 3.97 The provision of affordable housing as part of mixed-use sites can lead to greater vibrancy and distinctiveness in communities and can lead to an improved sense of well-being for people previously excluded from the housing market.

### **3.98 Key Policy Weaknesses**

- 3.99 None

### **3.100 Recommendations for Mitigation**

- 3.101 None

## **BDP9 Rural Exception Sites**

**BDP9.1** Exceptionally, affordable housing will be allowed in or on the edge of settlements in the Green Belt where a proven local need has been identified. In accordance with the Settlement Hierarchy (BDP2) Bromsgrove Town and the large settlements are not acceptable locations for rural exception housing.

**BDP9.2** Every application for affordable housing under this policy must contain a Local Housing Needs Survey. This survey should be completed prior to the submission of any planning application and identify the following:

- a. A genuine need to live within the village – A local connection will be required for this e.g. employed/live within the village or need to give or receive support from a close family member who lives in the village;
- b. A financial need for affordable housing – The survey should identify individuals who are unlikely to be able to get a sufficient mortgage to purchase a property on the open market that meets the basic needs of their family; and



- c. **The type and tenure of affordable housing – The survey should gather information ascertaining the size of the property required and whether social rented, intermediate or affordable rent accommodation is needed**

**BDP9.3 The following sequential test will be applied to sites:**

- i. In the first instance sites should be located within existing settlement boundaries**
- ii. Where there is not possible sites should be adjacent to the village boundary**

**BDP9.4 Under no circumstances will housing be considered on sites that are detached from settlements that appear as isolated housing developments in the open countryside.**

**BDP9.5 Any proposals should be proportionate to the size of the settlement in question and therefore it is considered that schemes should not generally be larger than 15 units. Under no circumstances will schemes be permitted where the number of units exceeds the need identified in the Housing Needs Survey.**

**BDP9.6 Whilst the Council has a preference for 100% affordable housing schemes, where it can be robustly justified through a viability appraisal the inclusion of other tenures within a scheme may be acceptable. The majority of any scheme should always consist of affordable housing and viability appraisals should highlight that the amount of any market housing included is minimised so that only sufficient finance is raised to provide the required cross-subsidy without leaving a residual profit.**

### **3.102 Key Policy Strengths**

3.103 The policies key strength is that it intends to contribute towards the provision of affordable housing to meet identified needs, specifically in rural areas where the levels of unmet need are highest. Providing affordable housing is an important means of reducing social exclusion for those, largely local and younger residents on lower incomes, who cannot afford to buy houses as prices have been raised by higher income commuters working in the conurbation and living in Bromsgrove.

3.104 The policy permits the inclusion of some market housing within rural exception schemes in certain circumstances. The development of mixed tenure sites can lead to greater vibrancy and distinctiveness in

communities and can lead to an improved sense of well-being for people previously excluded from the housing market.

- 3.105 The provision of some additional housing within rural communities could help to maintain key rural facilities and services such as shops and bus services. This would maintain the vitality and viability of settlements.

### **3.106 Key Policy Weaknesses**

- 3.107 Any applications approved under this policy would almost certainly result in the loss of some greenfield and Green Belt land. This could potentially damage the landscape character and affect biodiversity.

### **3.108 Recommendations for Mitigation**

- 3.109 It is recommended that a sequential test is included as one of the things that applicant needs to do if affordable housing is to be developed in the Green Belt.

## **BDP10 Homes for the Elderly**

**BDP10.1 Bromsgrove District Council will encourage the provision of housing for the elderly and for people with special needs, where appropriate whilst avoiding an undue concentration in any location.**

**BDP10.2 The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standards, so that they can be readily adapted to meet the needs of those with disabilities and the elderly, as well as assisting independent living at home.**

**BDP10.3 The Council will, through the identification of sites and/or granting of planning consents in sustainable locations, provide for the development of residential care homes, close care, 'extra care' and assisted care housing; and in particular Continuing Care Retirement Communities which encompass an integrated range of such provision. Sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements. Where such sites are not available regard will be paid to the potential for development to be self-**

**contained to reduce travel requirements and the availability and accessibility of public transport.**

### **3.110 Key Policy Strengths**

- 3.111 This main strength of this policy is it actively promotes the provision of housing for the needs of the elderly. The ageing population in Bromsgrove is expected to continue for a number of years, which as a result will mean accommodation will be needed for the older residents of Bromsgrove. The policy will attempt to contribute to the housing needs identified through housing surveys.
- 3.112 Providing housing that is more suitable to the elderly is an important means of reducing social exclusion through reducing barriers to housing for the older sectors of society. The policy will also contribute to the health and well-being of the elderly by adhering to 'Lifetime Homes' standards, allowing people to live in their homes longer.
- 3.113 The provision of residential care facilities also will have a direct impact on the health of the elderly, as well as reducing the fear of crime amongst this section of society. The policy also achieves sustainability objectives by providing sites in sustainable locations, reducing the need for the elderly to travel to key services, which can also have a positive effect on climate change.

### **3.114 Key Policy Weaknesses**

- 3.115 The policy suggests that in exceptional circumstances, housing for the elderly may be allowed outside defined settlements where there is proven local need. This will potentially damage the landscape character and affect biodiversity of some countryside locations.

### **3.116 Recommendations for Mitigation**

- 3.117 It is recommended that a sequential test is included as one of the things that an applicant needs to do if housing for the elderly is to be developed outside of defined settlements.

## **BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople**

**BDP11.1 Safeguarding existing authorised sites;  
Existing authorised sites for Gypsies and Travellers that are suitably located within the District will be safeguarded unless it is proven that they are no longer required to meet identified needs.**

**BDP11.2 Sustainable locations for Gypsy and Traveller accommodation;**

**Proposed sites should be in sustainable locations that provide good access to essential local facilities e.g. health and education. Sites should accord with the sustainable development principles set out in BDP1.**

**BDP11.3 If additional sites are required land will be identified through a full Green Belt Review.**

### **3.118 Key Policy Strengths**

3.119 The policy's key strength is that it intends to contribute towards the provision of housing to meet specific needs, thereby reducing social exclusion. The policy addresses sustainability by highlighting that sites should have good access to essential facilities and there is also a clear link to BDP1 Sustainable Development Principles.

### **3.120 Key Policy Weaknesses**

3.121 If a further site needs to be found to accommodate gypsies and travellers it is likely to be on a greenfield site within the Green Belt due to a lack of suitable alternatives on brownfield land. This would lead to a conflict with objectives EV2 and EV3 which seek to protect the countryside and enhance landscape character and quality.

### **3.122 Recommendations for Mitigation**

3.123 None

## **BDP12 Sustainable Communities**

**BDP12.1 The Council will ensure provision is made for services and facilities to meet the needs of the community. It will also seek to retain existing services and facilities that meet a local need or ensure adequate replacement is provided. New developments that individually or cumulatively add to requirements for infrastructure and services will be expected to contribute to the provision of necessary improvements in accordance with BDP6.**

**BDP12.2 To ensure that new development contributes to the provision of sustainable and inclusive communities to meet long term needs, the Council will seek to ensure community facilities are provided to meet local needs by:**

- a) Supporting the provision of new facilities for which a need is identified in locations accessible to the community served**
- b) Supporting improvements to existing facilities to enable them to adapt to changing needs**
- c) Resisting the loss of existing facilities unless it can be demonstrated that:**

- i) **There is no realistic prospect of the use continuing for operational and/or viable purposes**
- ii) **The service or facility can be provided effectively in an alternative manner or on a different site**
- iii) **The site has been actively marketed for a period of not less than 12 months or made available for a similar or alternative type of service or facility that would benefit the local community**
- iv) **There are overriding environmental benefits in ceasing the use of the site.**

### **3.124 Key Strengths**

3.125 The policy focuses on protecting essential local facilities and ensuring that new developments contribute to creating a better balance of facilities, services and infrastructure within settlements. The policy has clear benefits for addressing social exclusion in rural areas by aiming to ensure that settlements maintain a range of local and accessible facilities.

3.126 The policy enables the development of vibrant and locally distinctive communities. Maintaining services and facilities in local centres may reduce the need for people to travel and hence reduce energy use and air pollution.

3.127 The form of local service provision will take into account the impact of the proposal, the nature of the settlement and the needs of the community. Development proposals will be required to provide or contribute to the provision of facilities, infrastructure and services and other forms of environmental and social requirements, that are necessary to make a scheme acceptable in planning terms. All forms of development should achieve a net benefit to the local community taking account of its needs and aspirations. The nature and scale of any planning requirements will be related to the type of development and its potential impact on the area.

### **3.128 Key Weaknesses**

3.129 There are no clear adverse impacts of the policy; however, the strong linkages to BDP6 requiring developer contributions for the provision of facilities, infrastructure and services and other forms of environmental and social requirements may limit the viability of a scheme.

### **3.130 Recommendations for Mitigation**

3.131 If circumstances arise where the viability of a scheme is compromised by the level of developer contributions it will be necessary for the applicant to demonstrate this and thus enable a lower level of contribution to be negotiated.

## **BDP13 New Employment Development**

**BDP13.1 The Council will seek to maintain a balanced portfolio of sites by promoting the following:**

- a. New technology opportunities at Bromsgrove Technology Park and Longbridge**
- b. Office and mixed use schemes within Bromsgrove Town Centre**
- c. A range and choice of readily available employment sites to meet the needs of the local economy**
- d. Economic development opportunities within Bromsgrove Town and Large Settlements including within the Town Expansion Sites and Other Development Sites identified as suitable for employment use in BDP5A and B**
- e. Sustainable economic development in rural areas through proportionate extensions to existing business or conversion of rural buildings taking into account the potential impact on the openness and the purposes of including the land in Green Belt. Proposals that can demonstrate significant benefits to the local economy and/or community will be considered favourably**
- f. The accommodation of waste management facilities within designated employment sites in accordance with the Waste Core Strategy for Worcestershire**
- g. Appropriate skills development, training and the creation of jobs for local residents as part of the promotion of employment sites.**

### **3.132 Key Policy Strengths**

3.133 The policy has key strengths in terms of promoting employment and economic growth. The promotion of 'new technology' opportunities could also be instrumental in diversifying the economy with industry which is usually of lower environmental impact than more traditional manufacturing industry. Assuming employment is taken up by local people, this can have many positive effects; increasing levels of income for local people; promoting vibrant and sustainable communities through locating employment opportunities near to housing and transport infrastructure; enabling a greater choice in travel modes and potentially a reduction in commuting distances; reducing car traffic and hence vehicular emissions, energy use and greenhouse gas emissions.

3.134 Focusing growth in urban areas, where there is a larger proportion of brownfield land, means that regeneration of previously developed land is more likely and this potentially can lead to contaminated land remediation. The development of land at Longbridge is adjacent to the

existing settlement of Birmingham and is therefore considered to be sustainable.

- 3.135 Employment development in rural areas should help to maintain the vibrancy of village communities and could help to provide jobs for local people.

### **3.136 Key Policy Weaknesses**

- 3.137 Some employment development is promoted on the strategic sites, other development sites and also in rural areas which will lead to the use of some greenfield land. This could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality. A detailed site selection process has been undertaken with regards to the strategic sites and other development sites and these are considered to be the most suitable sites around the district. The impact on any rural sites will need to be assessed on a site by site basis.

### **3.138 Recommendations for Mitigation**

- 3.139 None

## **BDP14 Designated Employment**

**BDP14.1 The regeneration of the District will continue through maintaining and promoting existing employment provision in sustainable, accessible and appropriate locations (as identified on the Policies Map).**

**BDP14.2 Proposals for the expansion, consolidation or extension to existing commercial and industrial uses in non Green Belt will need to ensure the scale and nature of the activity is appropriate for the area in which it is located.**

**BDP14.3 Bromsgrove District Council will safeguard employment areas that:**

- a) Are well located and linked to the main road and public transport network; and**
- b) Provide, or are physically and viably capable of providing through development, good quality modern accommodation attractive to the market; and**
- c) Are capable of meeting a range of employment uses to support the local economy.**

**BDP14.4 Proposals that result in the loss of employment land for non-employment uses, such as housing, will not be considered favourably unless applicants can adequately demonstrate that:**

- i) The proposal would not have an adverse impact upon the quality and quantity of employment land within the local area; and**
- ii) There would be a net improvement in amenity (e.g. ‘non conforming’ uses close to residential areas); and**
- iii) The site has been actively marketed for employment uses for a minimum period of 12 months, providing full and detailed evidence or where an informed assessment has been made as to the sustainability of the site and/or premises to contribute to the employment land portfolio within the District (as part of this assessment, consideration should be given to the appropriateness for subdivision of premises); or**
- iv) The new use would result in a significant improvement to the environment, to access and highway arrangements, or sustainable travel patterns which outweighs the loss of employment land; and**
- v) The site/premises are not viable for an employment use or mixed use that includes an appropriate level of employment. A development appraisal should accompany proposals to clearly demonstrate why redevelopment for employment purposes is not commercially viable.**

**BDP14.5 In line with the NPPF, planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where the above criteria is justified and there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.**

### **3.140 Key Policy Strengths**

- 3.141 The policy has key strengths in terms of promoting employment and economic growth. The maintaining and promoting of existing employment provision will enhance the employment opportunities for local people in locations already proven to be sustainable and appropriate. Assuming employment is taken up by local people, this can have positive effects by increasing levels of income for local people. These already established employment locations can also promote vibrant and sustainable communities as employment opportunities are near to housing and transport infrastructure. This also enables a greater choice in travel modes and potentially a reduction in commuting distances. This can have knock-on effects on reducing car



traffic and hence vehicular emissions, energy use and greenhouse gas emissions.

- 3.142 Focussing growth in existing employment areas, where there is a larger proportion of brownfield land, means that regeneration of previously developed land is more likely and this potentially can lead to contaminated land remediation. The existing employment sites have also been taken out of the Green Belt during the Local Plan process; therefore development would not have detrimental effects to this issue.
- 3.143 Restricting the change of use of existing employment land, results in more land being available for employment provision, which in turn reduces the need for greenfield land for development. This will also have positive environmental and biodiversity related benefits to the area as less greenfield land is required.

### **3.144 Key Policy Weaknesses**

- 3.145 Although the use of existing employment sites will result in the majority of development on brownfield land, some areas will still occur on Greenfield land. Impacts upon biodiversity are not known as they tend to be localised and very much dependant upon the specific sites developed. However, whilst it is generally better for development to be located away from greenfield sites, some existing employment sites may have ecological value and should be protected.

### **3.146 Recommendations for Mitigation**

- 3.147 None

#### **BDP15 Rural Renaissance**

**BDP15.1 The Council will support proposals that satisfy the social and economic needs of rural communities by encouraging:**

- a) **Development that contributes to diverse and sustainable rural enterprises within the District**
- b) **New agricultural dwellings of an appropriate scale for the use of people in agricultural activities where a genuine need exists (occupancy conditions will apply). The District Council will not remove an agricultural occupancy condition unless it is satisfied that the property is no longer required for the holding or the agricultural needs of the area**
- c) **The conversion of suitably located/constructed buildings (For example timber stables and steel portal frame buildings are not suitable for conversion)**
- d) **Affordable housing on rural exception sites in line with BDP9**

- e) **Appropriate development of infill sites and previously developed land within existing settlements that enhance the vitality of rural communities**
- f) **Limited extension(s), alteration or replacement of existing buildings where the extension(s) or alterations are not disproportionate to the size of the original building, and in the case of a replacement building the new building is not materially larger than the building it replaces (in line with BDP4)**
- g) **Rural diversification schemes, as well as the provision of live-work units and the principle of home working**
- h) **Re-use of historic farmsteads to promote them as assets in the landscape**
- i) **Sport, recreation and/or tourism related initiatives appropriate to a countryside location. For example in relation to Avoncroft Museum on the Hanbury Road, the Council will support activities and operations where these are clearly relevant to the primary function of the site.**
- j) **Proposals for new buildings in association with equine development, such as stables and field shelters where new buildings are kept to a minimum necessary and consist only of essential facilities (for example small stables) genuinely required on a parcel of land, which preserves the openness of the Green Belt. Unless exceptional circumstances are demonstrated, these developments are to be sited within close proximity to existing rural buildings**
- k) **Small scale renewable energy projects and business to serve the industry**
- l) **Improvement of public transport links to service centres and employment areas, as well as development that reduces the need to commute**

**BDP15.2 The Council intends to prepare Supplementary Planning Documents to provide detailed guidance on the conversion of rural buildings, occupancy conditions as well as the design of agricultural buildings.**

**BDP15.3 In all cases development should be designed to be sustainable, consistent with requirements of Policy BDP12 and BDP19; should not conflict with the environmental protection and nature conservation policies of the District Plan but should seek to enhance the environment; and should provide any necessary mitigating or compensatory measures to address harmful implications. Within the Green Belt, inappropriate development which is otherwise acceptable within the terms of this policy will still need to be justified by very special circumstances.**

### **3.148 Key Policy Strengths**

- 3.149 Allowing employment development in rural areas will help to support the rural economy, especially in the field of diversification and growth of new businesses which support existing leisure and tourism. This is important for rural regeneration as the agricultural sector is gradually shrinking in employment and wealth. The diversification can improve accessibility to services and the well-being of the local population.
- 3.150 The provision of affordable housing to meet local needs can allow a greater proportion of the rural population to stay and work more locally, with positive benefits for traffic generation and climate change.
- 3.151 The policy promotes sport and recreation in countryside locations which can benefit health and well-being. Encouraging more development in rural locations and improvements to public transport would mean shorter distances for rural communities to travel, thus encourage more sustainable modes of transport and positively impact on the health and well-being of the population. Along with the provision of small renewable energy projects, this would also have positive environmental effects on the climate change.
- 3.152 The conversion of suitable buildings and re-use of historic farmsteads can promote them as assets in the landscape, utilise PDL and help to conserve buildings of architectural and historical value.
- 3.153 There are numerous economic advantages to this policy. Development that contributes to rural enterprises, the provision of rural diversification schemes, and sport, recreation and tourism initiatives will all widen the employment opportunities in the rural areas of the District. The provision of agricultural dwellings and live-work units allows those with the skills for certain practices to stay in close proximity to their place of work.

### **3.154 Key Policy Weaknesses**

- 3.155 However, beyond a certain point, it is likely that such environmental spin offs will be outweighed by increased commuting into rural areas, as well as traffic impacts from delivery vehicles and customers. Also, there is likely to be some landscape, biodiversity, noise, air quality, water quality impact from a wider spread of economic development in the open countryside. Although this policy could encourage applications for development in the Green Belt, special circumstances would need to be justified, as all inappropriate development would be refused.

### **3.156 Recommendations for Mitigation**

- 3.157 In all cases development should be designed to be sustainable, consistent with requirements of Policy BDP12 and BDP19; should not conflict with the environmental protection and nature conservation

policies of the District Plan but should seek to enhance the environment; and should provide any necessary mitigating or compensatory measures to address harmful implications. Within the Green Belt, inappropriate development which is otherwise acceptable within the terms of this policy will still need to be justified by very special circumstances.

## **BDP16 Sustainable Transport**

**BDP16.1 Development should comply with the Worcestershire Local Transport Plan 3 policies, design guide and car parking standards<sup>12</sup>, incorporate safe and convenient access and be well related to the wider transport network.**

**BDP16.2 Contributions from developers will be sought for new development in respect of investment in public transport, pedestrian, cycle and highways infrastructure as detailed by the draft Bromsgrove Infrastructure Delivery Plan in conjunction with policy BDP6 Infrastructure Contributions.**

**BDP16.3 The Council will support the use of low emission vehicles including electric cars through encouraging the provision of charging points in new developments.**

**BDP16.4 The Council will continue to work with key stakeholders to support significant improvements in, and increase usage of, passenger transport, for example, ensuring an integrated and regular bus service is provided which will connect residential areas to the railway station, with the Town Centre acting as the focal hub and supporting the enhancement of railway infrastructure and the relocation and improvement of facilities at Bromsgrove Railway Station.**

**BDP16.5 The improvement of car parking and cycling provision at stations will be supported where appropriate and in accordance with other policies contained within this Plan.**

**BDP16.6 Infrastructure for pedestrians and cyclists, for example access routes and cycle parking, will be provided in a safe and sustainable environment within the context of green infrastructure, as an integral feature of proposed development. Developments which would worsen walking and cycling access and exacerbate motor vehicle dependence should not be permitted.**

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<sup>12</sup> Worcestershire LTP3 Highways Design Guide Appendix A Worcestershire County Council Parking Standards (March 2011).

**BDP16.7 Retail and employment development should make proper provision for freight delivery and collections and should consider using sustainable methods of freight transport.**

**BDP16.8 The Council will encourage the use of travel plans where applicable to secure the provision of sustainable travel choices, both to new developments and to extensions of existing sites, regardless of use.**

**BDP16.9 Developments which generate significant travel demands must include a transport statement or transport assessment, being fully informed by guidance, and have easy access to existing or proposed public transport links.**

### **3.158 Key Policy Strengths**

- 3.159 The use of the private motor car dominates above all other modes in Bromsgrove. Central to this policy is the encouragement of a modal shift from use of the private motor car to more sustainable travel methods such as walking, cycling and increased use of public transport and encouraging green travel methods within new development. In so doing this policy complements policy BDP22 by reducing carbon emissions. A further strength is that it aims to encourage a cultural change in residents. By reducing the reliance of the population on the private motor car, it prepares for the inevitable depletion of non-renewable energy sources i.e. fossil fuels, or at least relieves the burden on such resources until design technology can deliver viable energy alternatives to power private motor vehicles. Thus this policy attempts a flexible approach to future proofing the District to the inevitable future changes in travel modes.
- 3.160 Encouraging greater use of electric and plug-in hybrid vehicles by promoting electric vehicle charging points in new developments without making developments unaffordable will also directly reduce carbon emissions and improve air quality and a reduction in private car travel will also relieve congestion. The use of sustainable travel modes will have health benefits for the local population.
- 3.161 The encouragement of walking and cycling and making provision in new development for such activities will reinforce the strengthening of the green infrastructure network. This will have knock on effects on biodiversity, as will an improvement in air quality, and also on health and well-being.
- 3.162 The policy also supports reducing the need to travel by designing sustainable communities and supporting home-working where appropriate. This also may have an impact on improved health.

### **3.163 Key Policy Weaknesses**

- 3.164 As Bromsgrove District Council is not the Highway Authority the Council's ability to directly influence service providers is limited.
- 3.165 It also cannot be denied that for the foreseeable future, until a culture change can be effected, people and industry will be reluctant to forsake the convenience and choice that independent car travel offers. A cultural step change is required which may be difficult to bring about and in the best case scenario is only likely to take place gradually.
- 3.166 The District is 91% Green Belt and comprises one main town and a number of settlements ranging in size and largely dispersed over a large rural area. At present public transport is neither reliable nor has adequate penetration or frequency. A vast improvement in public transport is required to bring about modal shift which will require significant investment in infrastructure in the present climate of economic recession.

### **3.167 Recommendations for Mitigation**

- 3.168 It is recognised that the District Plan will not contain the answers to all issues, some of them essentially being outside the scope of planning. However by flagging up such issues and raising awareness this in itself may provide a catalyst for change. One such example is that the success of the policy depends greatly on the Worcestershire County Council Local Transport Plan 3.
- 3.169 The policy aims to support local centres with new development and home-working, therefore to a certain extent reducing the need to travel at source.
- 3.170 The LPA can use its influencing powers with other service providers to advocate and support sustainable travel modes and modal shift in new developments. It will continue to support development in sustainable locations thus reducing the need to travel.
- 3.171 The policy supports community transport measures which provide a certain level of public transport penetration into rural areas.

## **BDP17 Town Centre Regeneration**

**BDP17.1 The Town Centre, as shown on the Policies Map, represents an area where significant change and conservation is needed along with a planning framework to guide and promote future development. All new development is required to be appropriate, in terms of scale, quantity and use, to the character and function of the Town Centre.**

### **BDP17.2 Bromsgrove Town Retail Capacity**

## **BDP17.2.1**

**BDP17.2.2 Bromsgrove Town Centre will continue to be the main retail centre of the District with extended Primary and Secondary Shopping Zones being the focus. As such:**

- a) A1 Uses will remain the predominant use for ground floor premises in the Primary Shopping Zone in order to maintain the retail vitality and viability of the Primary Shopping Zone and wider Town Centre.**
- b) Other A class uses will be supported throughout the Secondary Shopping Zone. Development outside A Class Uses in Secondary Shopping Zones and will be considered where there is no adverse impact to the retail viability of the Town Centre.**
- c) Retail development will be generally resisted in other areas of the designated Town Centre unless it can be demonstrated that proposals will not have an adverse impact on the viability and vitality of the primary or secondary shopping zones.**

**The Council will:**

- d) Continue to support markets in the Town Centre and provide for specific facilities within the public realm to ensure that a range of different markets can contribute to the overall vitality of the Town Centre.**
- e) Support proposals to deliver high quality housing which provides a mix of unit sizes and tenure, contributing to the districts overall affordable housing provision. This includes retirement living accommodation on Recreation Road; development of vacant premises above shops on and surrounding the High Street; residential development within mixed use schemes.**
- f) Continue to support small specialist shops, whilst creating opportunities for new retailers to enter the Town; and seek to offer new opportunities for people to work in the Town by providing an enhanced Town Centre which provides flexible business spaces available to accommodate a wide range of employment uses, as well as dedicated B1 office developments. Existing employment sites will be the focus of new employment developments.**
- g) Protect and enhance all existing public open spaces within the Town Centre with specific proposals for enhancements on The High Street, The Spadesboune Brook and The Recreation Ground.**
- h) Seek to improve the range of the evening economy uses within the Town Centre, to include a mix of entertainment uses for all groups, including sport, leisure and culture, a choice of bars, cafes and restaurants. New opportunities for community events will be explored including community focused leisure and cultural development and potential for a new Civic Centre whether stand alone or part of a mixed use scheme.**

### **BDP17.3 Movement**

- a) Sustainable travel will be promoted by improving pedestrian priority, linkages and mobility within and across the Town Centre; improving pedestrian and cycle linkages in particular between Bromsgrove Railway Station and the Town Centre, and improving key junctions including Birmingham Road/Stourbridge Road.**
- b) Significant improvements in public transport, will be encouraged particularly to bus services in order to provide an integrated and regular bus service which will connect new and existing residential areas to the Railway Station, with the Town Centre acting as the focal transport hub.**
- c) Town Centre Car Parking will be restructured to offer a network of fewer, more efficient car parks at key locations, opportunities for developing smaller more evenly distributed car parks will be considered.**
- d) The proposals will contribute towards ensuring accessibility for all.**

### **BDP17.4 Public Realm**

**Measures to ensure an attractive and safe Town Centre is created will be encouraged by implementing a new public realm scheme and complementary design and conservation policies. The High Street will be the focus of public realm improvements.**

### **BDP17.5 Urban Design and Conservation**

**The design of new development should be of the highest quality and respect the historic environment within which it sits. New proposals should encourage more sympathetic and high quality infilling schemes. All development proposals should meet the following principles:**

- a) Include high standards of architecture and design, using high quality sustainable materials and building methods.**
- b) The sensitive redevelopment of sites which currently detract from the character and appearance of the Town Centre, with new buildings that add to the evolution of the area whilst respecting the scale, height, massing, alignment and materials of adjacent historic buildings**
- c) New developments should respect the historic Town Centre street pattern, the established building line, historic spaces between buildings and the overall sense of place.**
- d) New buildings are to frame streets and public spaces providing natural surveillance, and preserving and exploiting important views into, within and out of the Town Centre**
- e) Design proposals at gateway locations such as the Historic Market Site, Parkside Cross roads and the Stratford Road/**



**Windsor Street/Strand area to reflect their prominence and importance to the character of the Town Centre.**

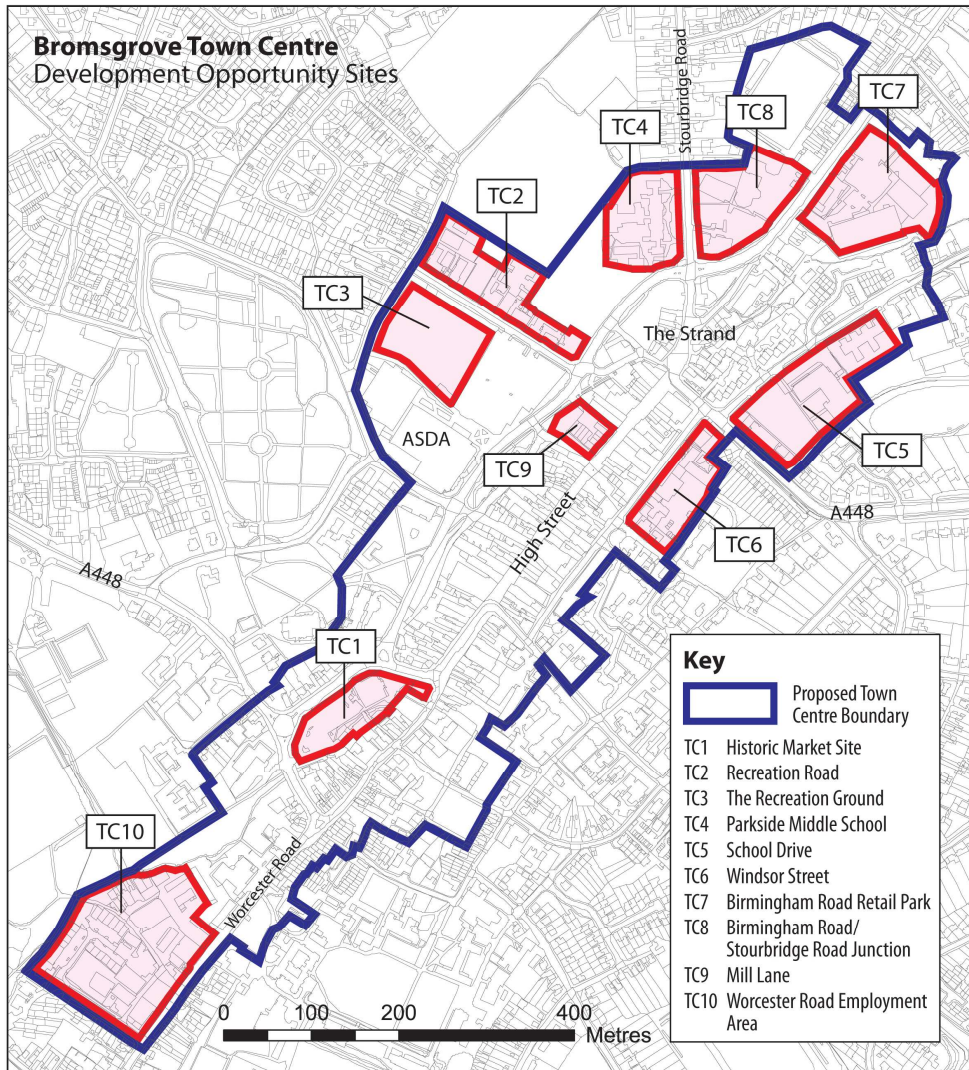
- f) On specified opportunity sites perimeter blocks are to be used that positively address roads, walkways and public spaces and all ground floors should contain active frontages.**
- g) When redeveloping shopfronts particular regard should be had to retaining surviving historic details, respecting established fascia lines, reducing illumination levels wherever possible, avoiding the use of external security measures.**

#### **BDP17.6 Natural Environment**

**Opportunities will also be encouraged in new schemes to mitigate against and adapt to the effects of climate change, for example, renewable energy and recycling. This will include the naturalisation of parts of the Spadesbourne Brook and improved open spaces like the Recreation Ground and Crown Close to improving the quality and value of open spaces in the Town Centre.**

#### **BDP17.7 Bromsgrove Town Centre Development Sites**

**Ten development sites have been identified in Bromsgrove Town Centre. The sites provide an opportunity to stimulate development and secure a long term future for Bromsgrove.**



**Table X: Town Centre development sites**

3.172 A separate SA has been carried out on each of the ten sites identified within this policy (see appendix D).

### 3.173 Key Policy Strengths

3.174 The regeneration of Bromsgrove Town Centre has the potential to create employment for local people and promote economic growth, particularly if Bromsgrove Town becomes more established as a retail centre for the District. This can help to improve the vitality of the Town Centre and have knock-on benefits in terms of marketing Bromsgrove as a good place to live, work and do business. The policy performs strongly against the social objectives by providing affordable housing, improving the health and well-being of the population and providing civic areas for people to meet and socialise.

3.175 The regeneration of the Town Centre will have many wide ranging benefits such as an improvement in quality and access for all to local

services and facilities, which is likely to include leisure and cultural facilities, healthcare, education and employment opportunities as well as a mix of housing types/tenures. The policy supports the regeneration of the Town Centre which is likely to have a positive impact on reducing levels of crime by increasing activity and natural surveillance which reduces fear of crime.

- 3.176 The promotion of the Town Centre for retail development ensures that future development is in the most sustainable location in the district where people have the opportunity to use public transport. By providing a full range of services and facilities in the town centre it will be possible to reduce people's need to travel and lead to a reduction in car journeys which will provide environmental benefits. Regenerating the town centre with new developments will raise the energy efficiency of the buildings due to the tightening Building Regulations.
- 3.177 The policy supports the regeneration of historic heritage as a large proportion of the Town Centre is located within a designated Conservation Area and there are many statutorily Listed Buildings within this area. There are also a significant amount of ancient monuments and archaeological remains. Furthermore promoting development away from the rural areas has the effect of providing the countryside and rural landscape with some protection.
- 3.178 Opportunities will be grasped in the regeneration process to enhance biodiversity for instance initiatives such as the naturalisation of parts of the Spadesbourne Brook. By concentrating resources on regeneration this inevitably maximises the use of previously developed land (PDL) and reduces the need to travel to more distant service centres offering similar facilities outside the District. It is likely that brownfield and potentially contaminated sites may be redeveloped and remediated if development is focussed towards urban areas.
- 3.179 The policy highlights that an element of employment development will be provided which will encourage additional inward investment in the town and boost the local economy.

### **3.180 Key Policy Weaknesses**

- 3.181 The policy may have adverse effects for existing local centres in the District as local residents may prefer to travel to Bromsgrove Town if the retail offer improves. This could mean that local centres become underused and therefore impact on the viability of some local shops.
- 3.182 If more people visit the town centre traffic congestion, associated noise and air pollution may increase unless measures are taken to encourage public transport use.

3.183 Some areas of the District are remote with poor public transport and therefore regeneration will inevitably encourage car travel from such locations.

### **3.184 Recommendations for Mitigation**

3.185 It is likely that these unsustainable trips would have occurred anyway and possibly to locations outside the district thereby losing local investment. Therefore this weakness is of potential economic benefit.

3.186 Finance gained through Section 106 Agreements on large town centre developments should be invested in improving public transport and the road network. In addition transport assessments should be undertaken for major new developments to fully assess any potential implications.

## **BDP 18 Local Centres**

**18.1 Within the areas defined on the Policies Map the District Council will allow proposals for retail development (Class A Uses) at ground floor level and retail, office or residential use at upper floor level. These areas are defined as Local Centres for shopping purposes in accordance with the provisions of Policy BDP2.**

**18.2 The District Council will only allow retail proposals which are capable of being integrated with the existing shopping frontages and which do not extend the shopping area. Planning permission for new local shops will be granted provided they are of an appropriate scale and it can be demonstrated that they will not undermine the vitality or viability of existing village facilities or those in Local centres and that there are no adverse impacts on residential amenity and road safety.**

**18.3 Throughout the District, the loss of a shop or service falling within Class A Use will be resisted unless it is demonstrated to be unviable or not required by the community. It may be considered appropriate for a non-retail related facility or service, where there is a proven need and where the development has overwhelming benefits for the local centre and the community. Applications for alternative uses of land or buildings will be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable Local centres and their communities.**

### **3.187 Key Policy strengths**

3.188 This policy is specifically concerned with retaining the prominence of Class A Uses at a ground floor level and retail, office or residential use at upper floor level within Local Centres. It also strives to resist the loss

of a shop or service falling within Class A Use. These mechanisms mean this policy aids numerous social objectives in terms of sustainability.

- 3.189 The provision of mixed used in Local Centres, with particular regard for retail facilities, mean these areas become more sustainable. People would be less likely to travel further afield for certain facilities and services, allowing more sustainable travel choices. This in turn can have effect on the health and well-being of local communities as they are more likely to walk or cycle to the centres. As cars could potentially be used less, there are also environmental advantages to this policy as there are possible improvements to air quality and the effects of climate change.
- 3.190 Creating active frontages and complimenting uses above retail units can reduce crime and anti-social behavior by providing natural surveillance there is also the potential for vacant buildings to be used for local retail facilities, which is an effective use of land and would help to retain the retail character of the centres.

### **3.191 Key policy weaknesses**

- 3.192 There are no identified adverse impacts of the policy.

### **3.193 Mitigation measures**

- 3.194 None

## **BDP19 High Quality Design**

**BDP 19 .1 The Council will deliver high quality people focused space through:**

- a. Requiring developments to use appropriate tools and follow relevant guidance and procedure to achieve good design;**
- b. Preparing a Design Guide Supplementary Planning Document;**
- c. Ensuring residential development achieve the highest standard of Building for Life;**
- d. Ensuring all affordable housing to meet the Code for Sustainable Home Level 6 and all market housing to meet Code Level 4 now and Code Level 6 by 2016;**
- e. Ensuring all non-residential developments to meet BREEAM 'very good' standard;**
- f. Ensuring development to enhance the character and distinctiveness of the local area;**
- g. Supporting all major developments that help facilitate interactions between future occupants;**
- h. Promoting developments to include new Public Art;**

- i. Creating and enhancing gateway locations and key approach corridors as well as protecting and enhancing important local and longer-distance visual corridors;**
- j. Ensuring developments are accessible to all users;**
- k. Ensuring permeable, safe and easy to navigate streets layout;**
- l. Avoiding road-dominated layout by supporting the design of street to follow the user hierarchy: 1) pedestrian; 2) cyclists; 3) public transport users; 4) specialist service vehicles (e.g. emergency services, waste, etc.); 5) other motor traffic;**
- m. Requiring residential developments to provide sufficient functional space for everyday activities, meet people's needs and expectations from their homes, and to enable flexibility and adaptability through meeting the internal environment standards in Standards and Quality in Development: A good practice guide;**
- n. Development of garden land will be resisted unless it fully integrates into the residential area, is in keeping with the character and quality of the local environment;**
- o. Ensuring developments meet the 'Secured by Design' standard;**
- p. Ensuring all trees that are appropriate (e.g. in terms of size, species, conditions and predicted climate) be retained and integrated within new development;**
- q. Ensuring development incorporates sufficient, appropriate soft landscaping and measures to reduce the potential impact of pollution (air, noise, vibration, light, water) to occupants, wildlife and the environment;**
- r. Ensuring development is made suitable for the proposed final use, for instance, in terms of land contamination. The Council will determine whether reports detailing for example, site history; an appropriate remediation scheme; long term monitoring and maintenance proposals, will need to be submitted in support of any planning application. Such reports will be prepared in accordance with best practice guidance.**
- s. In relation to air quality all new developments with a floor space greater than 1000sqm or 0.5 hectare or residential developments of 10 or more units must not increase nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>10</sub>) and carbon dioxide (CO<sub>2</sub>) emissions from transport and should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance.**
  - a. All planning applications meeting the above criteria should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance. The applicant will also take into account the cumulative impacts of validated developments in the local area. Additionally, the assessment should consider the impact of local air quality on the proposed development.**
  - b. Development with the potential to result in significant impact on air quality, either cumulatively or individually will be resisted unless appropriate measures to mitigate the**

**impact of air pollutants are included. Development will be expected to contribute to the provision of adequate mitigation measures in accordance with BDP6.**

- t. Development proposals should maximise the distance between noise sources (for example motorways) and noise sensitive uses (such as residential), whilst also taking into account the implications of the existing night time use of the locality.**
- u. Ensuring a feasible and viable management plan is available for all the facilities and provisions arising from the development;**
- v. Ensuring development make the best use of land in accordance with BDP7 Housing Mix and Density**

**BDP 19.2 For large scale developments, developers will need to prepare Design Codes for the area, which would then serve to inform all developments in that area as they come forward.**

### **3.195 Key Policy Strengths**

3.196 This is a strong policy which has many positive features with respect to sustainability and the SA objectives. Principally these include: the development of quality living environments that respect the landscape, townscape and heritage of their receiving environments. This can have many social benefits in terms of creating vibrant and locally distinctive communities, encouraging safety by design and hence improving resident's sense of good health and well-being. The policy also promotes tree plantings and retaining trees that already exist on-site to help reduce the impacts of pollutants. These built environment benefits can also have positive effects on the economy and regeneration of the Bromsgrove Town Centre and Longbridge as they assist the marketing of the District as a good place to work and do-business. This can encourage the creation of new businesses and investment in the District and hence improve economic growth in the long-term.

### **3.197 Key Policy Weaknesses**

3.198 There are no clear weaknesses to this policy.

### **3.199 Recommendations for Mitigation**

3.200 None

## **BDP 20 Managing the Historic Environment**

**20.1 The District Council advocates a holistic approach to the proactive management of the historic environment which encompasses all heritage assets recognised as being of significance for their historic, archaeological, architectural or artistic interest.**

**20.2 The District Council will support development proposals which sustain and enhance the significance of heritage assets including their setting. This includes:**

- a. Designated heritage assets, including listed buildings, conservation areas, scheduled ancient monuments, registered parks and gardens.**
- b. Non- designated heritage assets including (but not limited to) those identified on the local list and assets recorded in the Historic Environment Record.**
- c. The historic landscape of the District, including locally distinctive settlement patterns, field systems, woodlands and historic farmsteads.**
- d. Designed landscapes, including parks and gardens, cemeteries, churchyards, public parks and urban open spaces.**
- e. Archaeological remains of all periods from the earliest human habitation to modern times.**
- f. Historic transportation networks and infrastructure including roads, trackways, canals and railways.**

**20.3 Development affecting heritage assets, including alterations or additions as well as development within the setting of heritage assets, should not have a detrimental impact on the character, appearance or significance of the heritage asset or heritage assets.**

**20.4 Applications to alter, extend, or change the use of heritage assets will be required to provide sufficient information to**



**demonstrate how the proposals would contribute to the asset's conservation whilst preserving or enhancing its significance and setting.**

**20.5 In considering applications regard will be paid to the desirability of securing the retention, restoration, maintenance and continued use of heritage assets, for example, the District Council will support the sensitive reuse of redundant historic buildings, and will encourage proposals which provide for a sustainable future for heritage assets, particularly those at risk.**

**20.6 Any proposal which will result in substantial harm or loss of a designated heritage asset will be resisted unless a clear and convincing justification or a substantial public benefit can be identified in accordance with current legislation and national policy.**

**20.7 Consideration will be given to the designation of new conservation areas. In order to define and protect the special character of conservation areas, the District Council will produce and regularly review character appraisals and management plans for designated conservation areas, and where necessary introduce Article 4 Directions based on an assessment of local identity and uniqueness.**

**20.8 Where a detailed Conservation Area Appraisal Management Plan has been adopted, it will be a material consideration in determining applications for development within that conservation area.**

**20.9 Development within or adjacent to a conservation area should preserve or enhance the character or appearance of the area.**

**20.10 The demolition of buildings or the removal of trees and other landscape features which make a positive contribution to an area's character or appearance will be resisted.**

**20.11 Outline planning permission will not be granted for development within Conservation Areas unless supported by detailed proposals showing siting, design, external appearance and the relationship with adjacent properties.**

**20.12 The District Council will update the current draft local list of assets and formally adopt it. It would include all heritage assets recognised as being of local importance, including those which are locally distinctive such as nailers cottages, assets associated with the scythe industry and assets associated with the use of the Birmingham and Worcester canal which runs the length of the District, to name but a few.**

**20.13 The District Council will support development that:**

- i. Retains locally listed buildings.**
- ii. Involves sympathetic alterations and extensions to locally listed buildings**
- iii. Does not have a detrimental impact on the setting or context of locally listed buildings.**

**20.14 In considering applications that directly or indirectly affect locally listed buildings, a balanced judgement will be applied having regard to the scale of any harm or loss as a result of proposed development and the significance of the locally listed building.**

**20.15 The District Council will encourage opportunities to develop Green Infrastructure networks that can enhance the amenity value of the historic environment (refer to BDP24 Green infrastructure).**

**20.16 The District Council will promote a positive interaction between historic sites and places and high quality modern developments which allows for evolution and positive change whilst preserving and respecting the significance and setting of existing heritage assets.**

**20.17 Applications likely to affect the significance of known or potential heritage assets or their setting should demonstrate an understanding of their significance in sufficient detail to assess the potential impacts. This should be informed by available evidence and, where appropriate, further information to establish significance of known or potential heritage assets.**

**20.18 Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural, artistic or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the relevant Historic Environment Record.**

**20.19 The District Council will continue to undertake studies to inform local decision making and support the future growth of the Worcestershire Historic Environment Record. They will also encourage Neighbourhoods to address issues of character, heritage and design in their Neighbourhood Plans.**

**20.20 The District Council will embrace opportunities to mitigate the effects of climate change by seeking the reuse of historic buildings and where appropriate their modification to reduce carbon emissions and secure sustainable development without harming the significance of the heritage asset or its setting.**

### **3.201 Key Policy strengths**

- 3.202 The policy is very specific in the protection and enhancement of heritage in the District and as such, it does not impact upon many of the SA objectives. The District has a wealth of heritage assets that afford protection. The protection and enhancement of such assets can add to the vibrancy and local distinctiveness of the District and also acts as a cultural and recreational resource. Indirectly the enhancement of the heritage resource can also form an educational resource as well as the preservation of material assets.
- 3.203 The policy seeks to manage the historic environment of the District thereby ensuring that it is protected for future generations to learn from and enjoy. As custodians of both the historic built environment and natural landscapes the policy does not seek to “preserve it in aspic” but seeks to respect its place in history whilst welcoming complimentary new development where appropriate. The historic environment contributes to a sense of pride and quality of life and enriches people’s understanding of the diversity and changing nature of their community. Many areas have a rich historic legacy which contributes to local identity. Historic places can be a powerful focus for community action.
- 3.204 Conservation is based upon the fundamental principle of reuse and this is generally considered more sustainable than demolition and rebuilding. Demolition and construction account for a significant amount of the total annual waste produced in the UK.
- 3.205 Preservation of the historic environment gives an area its local distinctiveness and can have economic benefits for example, depending on the buyer a refurbished historic character property may attain a higher price on the market than an equivalent more modern and larger property.

3.206 Development in sensitive areas can often require the reuse of building materials to ensure that they compliment the surrounding environment. This supports the waste hierarchy that is identified in objective EV5.

### **3.207 Key policy weaknesses**

3.208 In some cases the layout and efficiency of historic buildings may be considered unsuitable and inefficient by modern day standards.

3.209 Historic buildings may in some cases be more costly to restore in terms of required materials and techniques. There are potential financial implications of delivering development that enhances the character and appearance of historic environment as the most appropriate external materials can be more expensive. This could limit the economic viability of developments and persuade developers to invest elsewhere. However, in the most sensitive settings the protection and enhancement of heritage should outweigh any financial constraints.

### **3.210 Mitigation measures**

3.211 The historic environment should be viewed as contributing to the uniqueness of Bromsgrove and as a valuable educational resource for future generations to understand social history. It also has the potential to contribute towards tourism and economic growth.

## **BDP 21 Natural Environment**

**BDP 21.1 The Council will seek to achieve better management of Bromsgrove's natural environment by expecting developments to:**

- a) Protect, restore, enhance and create core areas of high nature conservation value (including nationally and locally protected sites and irreplaceable nature resources such as sites with geological interest, ancient woodlands and habitats of principle importance), wildlife corridors, stepping stones and buffer zones.**
- b) Take appropriate steps to maintain the favourable conservation status of populations of protected species.**

- c) **Protect, restore and enhance other features of natural environmental importance, in line with local environmental priorities.**
- d) **Design-in wildlife, maximise multi-functionality in line with BDP24 Green Infrastructure and provide appropriate management, ensuring development follows the mitigation hierarchy and achieves net gains in biodiversity.**
- e) **Contribute towards the targets set out for priority habitats and species, the environmental priorities of the Local Nature Partnership, participating in the biodiversity offsetting scheme or its replacement, and connect to the Nature Improvement Area(s), the Living Landscape schemes or their equivalents, as appropriate.**
- f) **Deliver enhancement and compensation, commensurate with their scale, which contributes towards the achievement of a coherent and resilient ecological network.**
- g) **Protect and enhance the distinctive landscape character of Bromsgrove, as identified in the Worcestershire Landscape Character Assessment, and take account of the Worcestershire Landscape Character Assessment Supplementary Guidance.**
- h) **Contribute to the conservation and enhancement of geodiversity, in line with the objectives and actions in the Worcestershire Geodiversity Action Plan, where appropriate.**
- i) **Adopt good environmental site practices as appropriate, including in the form of a Construction Environmental Management Plan (CEMP) where appropriate.**

### **3.212 Key Policy Strengths**

- 3.213 The policy positively contributes to the environmental objectives which seek to protect and enhance landscape character and quality, areas of open greenspace, geodiversity, biodiversity and the quality of water, soil and air. It also helps reduce causes of and adapt to the impacts of climate change.
- 3.214 The policy has largely positive environmental impacts, although some positive social and economic impacts could also be realised. The protection and enhancement of natural assets can add to the vibrancy and local distinctiveness of the District and also acts as a cultural and recreational resource. For example, the enjoyment of the natural environment has recognised health and well-being benefits, give people pride in their local areas. The emphasis on biodiversity compensation and the requirement for good environmental site practice are likely to have positive impacts on the natural environment and will raise residents' interests to improve their knowledge on the natural environment.

### **3.215 Key Policy Weaknesses**

3.216 There are no identified adverse impacts of the policy.

### **3.217 Recommendations for Mitigation**

3.218 None.

## **BDP 22 Climate Change**

**BDP 22.1 The Council will deliver viable low carbon climate resilient developments through:**

- a. Encouraging development in existing buildings to achieve consequential energy efficiency improvements**
- b. Requiring allowable solutions to be linked with projects within the District in the first instance, followed by the County and then Region**
- c. Ensuring developments and infrastructure are planned to avoid increased vulnerability to the range of impacts and take advantage of the opportunities arising from climate change, having regard to the intended lifetime of the development. Where developments and infrastructure are brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, .**
- d. Ensuring developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure.**
- e. Ensuring the construction and design of developments as well as future occupants of the developments will follow the energy, waste management hierarchies and other relevant guidance. Where relevant, developments must comply with the Worcestershire Waste Core Strategy.**
- f. Supporting developments to incorporate zero or low carbon energy generation technologies, especially installations that improve the energy security of developments in the rural areas. Where there is a firm delivery plan of zero or low carbon energy generation scheme, developments nearby are expected to provide infrastructure/ to connect to the zero/ low-carbon energy scheme.**
- g. Supporting zero or low carbon energy generation schemes when adverse impacts are addressed satisfactorily.**

### **3.219 Key Policy Strengths**

3.220 The policy is clearly focused towards contributing to addressing the causes and potential impacts of climate change. Whilst the positive implications are delivered at a local scale, they would contribute to the wider goal of addressing global climate change.

- 3.221 The policy has many positive inferences upon the SA objectives. These include promoting the health and well-being of the population through seeking to reduce the need to travel by car (and hence encouraging alternative potentially less polluting or healthier forms of travel such as walking or cycling). The support given by the policy for development in sustainable locations is also likely to have positive impact on the vitality and viability of local services, facilities and centres and the policy seeks to reduce the need to travel by car which will have a number of wider benefits for the environment such as reducing traffic related noise and air pollution.
- 3.222 The policy also strongly supports the development of renewable energy, energy conservation, sustainable waste management, sustainable construction and design that allows developments to adapt to the changing climate.

### **3.223 Key Policy Weaknesses**

- 3.224 The policy has uncertain impacts on a number of objectives. They are all mainly related to renewable energy schemes. There are known negative impacts of some renewable energy schemes on the natural and historic environment should the schemes not be designed properly.

### **3.225 Recommendations for Mitigation**

- 3.226 To ensure relevant policies provide enough protection for the natural environment and historic environment (i.e. BDP20 Managing the Historic Environment; BDP21 Natural Environment).

## **BDP23 Water Management**

**BDC23.1 The Council will deliver safe developments with low environmental impact through:**

- a. Supporting developments that take into account of the Severn River Basin Management Plan and contribute to delivering the Water Framework Directive objectives.**
- b. Supporting developments that follow the water conservation hierarchy. All market housing developments should achieve at least the water category of the Code for Sustainable Homes Level 4 by 2013 and Level 6 after 2016. Affordable housing should at least achieve the water category of Code Level 6 from 2013 onwards. Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development.**
- c. Ensuring development addresses flood risk from all sources, follow the flood risk management hierarchy when planning and designing development, and do not increase the risk of flooding elsewhere. Where inappropriate developments in areas at risk of flooding are necessary after the sequential test**



- is applied, appropriate designs, materials and escape routes that minimise the risk(s) and loss should be incorporated.
- d. Requiring all developments to work with the Lead Local Flood Authority and SuDS Approval Body and pay necessary regard to the Local Flood Risk Management Strategy and its evidence.
  - e. Requiring all major developments to engage with Severn Trent Water at the earliest opportunity to ensure that sufficient capacity of the sewerage system (i.e. wastewater collection and treatment) is available to accommodate the development.
  - f. Supporting developments that protect and enhance water quality. This includes ensuring the phasing of development is in line with the completion of the required infrastructure and non-mains drainage will follow the foul drainage hierarchy with appropriate management plans in place.
  - g. Requiring developments to set aside land for Sustainable Drainage Systems (SuDS) and follow the SuDS management train concept. This includes maximising opportunities for restoring watercourses, deculverting, delivering multiple benefits in line with BDC24 Green Infrastructure and ensuring that an appropriate buffer zone is provided between the watercourse and any development.

### **3.227 Key Policy Strengths**

3.228 The policy aims to reduce flood risks to developments and improve the water environment so that it remains as a sustainable resource for years to come. The policy performs well against the social objective of improving people's health and quality of life and very strongly against the environmental objectives such as reducing flood risks to developments, contributing to conserving and enhancing biodiversity, sustainable/ efficient use of resources, protecting the water quality and reducing the causes of and adapting to climate change. It is also considered that the policy will help support the promotion of new industries and technologies that help achieve better water management.

### **3.229 Key Policy Weaknesses**

3.330 Effect on the historic environment is uncertain as the policies have both positive and negative impacts on them. For example, reduce flood risks to the historic assets will help preserving them but unsympathetic design may affect the settings and characters of the historic environment.

### **3.331 Recommendations for Mitigation**

3.332 To ensure BDP20 Managing the Historic Environment provides enough protection for the historic environment.

### **BDP24 Green Infrastructure**

**BDP24.1 The Council will deliver a high quality multi-functional Green Infrastructure network by:**

- a. Ensuring developments adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure, with priorities determined by local circumstances**
- b. Requiring development to improve connectivity and enhance the quality of Green Infrastructure.**
- c. Requiring development to provide for the appropriate long term management of Green Infrastructure.**
- d. Requiring development to have regard to and contribute towards, the emerging Worcestershire Green Infrastructure Strategy, any local GI Strategy and where available, the GI Concept Plans. For large scale development, developers will need to prepare a Concept Plan for the area, which would then serve to inform all developments in that area as they come forward.**

### **3.333 Key Policy Strengths**

3.334 The policy emphasises on the holistic approach to deliver the multiple benefits and vital services of Green Infrastructure, it therefore performs well against many of the objectives. Socially, the policy is likely to create a pleasant local environment, improve the health and well-being of the local population, improve accessibility to facilities and services and improve sustainable transport links. Environmentally, the policy is likely to enhance biodiversity and geodiversity, ensure efficient use of land, safeguarding the landscape character, enhancing the historic environment, reducing the causes of and adapting to the impact of climate change as well as enhancing the quality of water, soil and air. Economically, the policy is likely to improve the quality of educational opportunities from the increased functions of greenspace. Although not referred to in the objective, the policy could potentially increase the tourism offer in the District and the County.

### **3.335 Key Policy Weaknesses**

3.336 The policy performs well against many of the objectives but in reality, there could be a trade-off among the objectives depending on local circumstances.

### **3.337 Recommendations for Mitigation**

3.338 None.

## **BDP25 Health and Well-Being**

**BDP25.1 Bromsgrove District Council will support proposals and activities that protect, retain or enhance existing sport, recreational and amenity assets, lead to the provision of additional assets, or improve access to facilities, particularly by non-car modes of transport. This will include maintaining greater access to and enjoyment of the countryside. The Council will**

ensure all new residential developments meet and contribute towards the qualitative, quantitative and accessibility standards set for the open space, sport and recreation facilities in the District (as follows):

Typology	Quantity Standard (hectare per 1000 population)	Accessibility Standard (travelling time to the facility)
Parks and gardens	0.26	Walk: 15 minutes (720m) Drive: 15 minutes
Natural and Semi Natural Open Space	0.44	Walk: 15 minutes
Amenity Green Space	0.42	Walk: 10 minutes (480m)
Provision for Children	0.027	Walk: 10 minutes
Provision for Young People	0.03	Walk: 15 minutes
Outdoor Sports Facilities	1.67	Walk: 10 minutes (grass pitches) Drive: <ul style="list-style-type: none"> <li>▪ 15 minutes (tennis courts/ bowling greens)</li> <li>▪ 20 minutes (synthetic pitches, golf courses and athletics tracks)</li> </ul>
Allotments	0.19	Walk: 20 minutes (960m)

**BDP25.2** It will be impractical and inappropriate to deliver all the open space typologies on every site as the quality of sites varies and enhancement will be based on the conditions of the relevant facilities at the time. Where provision standards are not available, contributions will be negotiated in accordance with the recommendations in the Open Space, Sport and Recreation Assessment Study and the requirements at the time.

**BDP25.3** The Council will not permit the loss or displacement of existing indoor and outdoor open space, sport and recreation facilities (including both designated and undesignated areas on the Policies Map) to other uses unless it can be demonstrated through up-to-date and robust evidence that:

- a) There is a proven surplus of provision and the site is no longer needed, or is unlikely to be required in the future; or
- b) The benefit of the development to the community outweighs the harm caused by the loss of the facility; or

- c) **An alternative facility of an equal quantity and quality or higher standard will be provided in at least an equally convenient and accessible location to serve the same local community**

**BDP25.4 In such circumstances, the Council will require appropriate compensatory measures for the loss in the form of equivalent or improved facilities and/or financial contributions from developers.**

**BDP25.5 The Council will support opportunities for healthy and active lifestyles through:**

- i) Working with partners of the Worcestershire Health and Well-Being Board to explore new ways to improve opportunities for healthy and active lifestyles**
- ii) Providing high-quality walking and cycling routes**
- iii) Providing excellent access to sport, leisure and recreation facilities**
- iv) Promoting and supporting initiatives for local food-growing, such as allotments, as well as urban agriculture.**

**BDP25.6 Concentrations of A5 hot food takeaway uses in particular can be detrimental to the health of communities in the District. Proposals for hot food takeaways (Class A5) will only be permitted where:**

- a) The proposed use will not result in the proportion of units within the designated centre or frontage being hot food takeaways exceeding 5% (updated figures for each local centre will be published annually within the Council's AMR)**
- b) The proposed use will not result in more than two A5 units located adjacent to each other**
- c) The proposed use will maintain at least two non A5 units between individual and/or groups of hot food takeaways.**

**BDP25.7 With regard to proposals which fall outside the designated town centre or local centres (in line with the boundaries established in BDP17 and BDP18), planning permission for hot food takeaways will be resisted where proposals:**

- i) Fall within 400m of the of the boundary of a first, middle or high school**
- ii) Fall within 400m of a park or youth centred facility.**

### **3.339 Key Policy Strengths**

- 3.340 .The policy's major strength is in improving the health and well-being of Bromsgrove's population. The policy requires the retention and enhancement of open space for recreation and amenity and the

resulting improved living environment would help to improve the health and well-being of the population. The environmental benefits of maintaining or enhancing open space are wide reaching. Whilst some recreational areas, such as sport pitches, have little biodiversity value, well designed parks and gardens can contribute greatly to conserving and enhancing ecological diversity through habitat provision and the maintenance or creation of wildlife corridors. Open space can also be beneficial in terms of preserving landscape and townscape, which is particularly important in terms of preserving the historic setting of heritage features or conservation areas. The policy also has potential to minimise flood risk through maintaining areas of undeveloped green space that will enable precipitation to infiltrate the soil and reduce run-off.

3.341 Increasing access to leisure and recreation facilities, and maintaining greater access to the countryside not only has social benefits but promotes non-car modes of transport which has environmental advantages. The provision of high-quality walking and cycling routes will also contribute to the health and well-being of the population. The policy also goes further by promoting partnership working to explore new ways to improve opportunities for healthy and active lifestyles.

3.342 Reducing the over-concentration of any use type that detracts from the ability to adopt healthy lifestyles, such as hot food takeaways, can also actively assist in the health and well-being of communities. Also restricting A5 uses around schools and parks restricts the access children have to convenience foods that are high in fat and salt. The promotion and support of local food growing initiatives is not only sustainable, but encourages healthy food options.

### 3.343 **Key Policy Weaknesses**

3.344 There are no identified weaknesses to this policy

### 3.345 **Recommendations for Mitigation**

3.346 None

## 4 Assessment of Cumulative Effects

### 4.1 Assessment of Cumulative Effects

4.2 The SEA Directive requires that the cumulative effects of the plan to be assessed. The tables below summarise the cumulative effects of all of the Bromsgrove District Plan policies against each of the SA Objectives.

Table 4-1 SA Objective SO1: Provide decent affordable housing for all, of the right quality and tenure and for local needs, in clean, safe and pleasant local environment

Receptors:

- Human Population
- Housing Market

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	Only those policies that relate specifically to housing provision BDP3, BDP5, BDP7, BDP8, BDP9 and BDP10 are likely to have the greatest affect this objective. Other policies such as rural renaissance may improve the conditions for appropriate housing provision in rural areas and those policies relating to high quality design and location of growth may also have implications for the creating a safe and pleasant environment. On balance it is considered that there would be an overall <b>positive cumulative</b> impact on housing provision for local needs.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	+	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	++	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	++	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	+	
BDP8 – Affordable Housing	++	
BDP9 – Rural Exception Sites	++	

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	+	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	0	
BDP14 – Designated Employment	0	
BDP15 – Rural Renaissance	+	
BDP16 – Sustainable Transport	0	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	0	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	0	
BDP25 – Health and Well Being	0	

**Table 4-2 SA Objective SO2: To improve the health and well-being of the population and reduce inequalities in health**

Receptors:

- Human population
- Levels of health/well-being

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	A large number of policies contribute positively to the achievement of an improvement in the health and well-being of the population, whether it is through improving natural and living environments, including air quality, or more directly through BDP25 which focuses solely on health and well-being. On balance, there would be an overall <b>positive cumulative</b> impact in terms of improving health and well-being of the population through the Bromsgrove District Plan.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	0	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	+	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	?	
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	+	
BDP13 - New Employment Development	0	
BDP14 – Designated Employment	0	
BDP15 – Rural Renaissance	+	



<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP16 – Sustainable Transport	+	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	+	
BDP22 – Climate Change	+	
BDP23 – Water management	+	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	++	

**Table 4-3 SA Objective SO3: Improve the vitality and viability of Town Centre, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio economic status or educational attainment**

Receptors:

- Human population

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	A vast majority of the policies relate to either provision of services and opportunities for culture, leisure and recreation, or the location of new development within easy access to existing facilities. Consequently, it is likely that the Bromsgrove District Plan will have a <b>positive cumulative</b> impact upon the objective.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	0	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	+	
BDP8 – Affordable Housing	+	
BDP9 – Rural Exception Sites	+	
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	+	
BDP12 – Sustainable Communities	+	
BDP13 - New Employment Development	+	
BDP14 – Designated Employment	+	
BDP15 – Rural Renaissance	+	
BDP16 – Sustainable Transport	+	

<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP17 – Town Centre Regeneration	++	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	+	
BDP22 – Climate Change	+	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	+	

**Table 4-4 SA Objective SO4: Reduce crime, fear of crime and anti-social behaviour**

Receptors:

- Human population
- Crime statistics

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	Some of the policies have the potential to reduce crime rates and the fear of crime, although the extent of this will depend upon how the policies are implemented locally. Overall there is a <b>positive cumulative</b> impact upon reducing crime and the fear of crime.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	0	
BDP4 - Green Belt	0	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	+	
BDP8 – Affordable Housing	+	
BDP9 – Rural Exception Sites	+	
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	+	
BDP12 – Sustainable Communities	+	
BDP13 - New Employment Development	+	
BDP14 – Designated Employment	+	
BDP15 – Rural Renaissance	+	

<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP16 – Sustainable Transport	+	
BDP17 – Town Centre Regeneration	++	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	+	
BDP22 – Climate Change	+	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	+	

**Table 4-5 SA Objective SO5: Increase sustainable travel choices and move towards more sustainable travel**

Receptors:

- Human population
- Transportation network

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	++	Policies relating to the location of development, sustainable development/communities and sustainable transport provision all contribute to this objective. The Bromsgrove District Plan is likely to result in a <b>positive cumulative</b> impact upon the objective.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	+	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	+	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	+	
BDP12 – Sustainable Communities	+	
BDP13 - New Employment Development	+	
BDP14 – Designated Employment	+	
BDP15 – Rural Renaissance	+	
BDP16 – Sustainable Transport	+	

<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	+	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	+	

**Table 4-6 SA Objective SO6: To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community**

Receptors:

- Human population
- Local communities

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	0	A small number of policies are considered to encourage community participation through the creation of environments which people are proud of. The Bromsgrove District is likely to result in a <b>positive cumulative</b> impact upon the objective.
BDP2 – Settlement Hierarchy	0	
BDP3 – Future Development	0	
BDP4 - Green Belt	0	
BDP5A – Bromsgrove Town Expansion Sites	0	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	0	
BDP6 – Infrastructure Contributions	0	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	0	
BDP14 – Designated Employment	0	
BDP15 – Rural Renaissance	0	



<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP16 – Sustainable Transport	0	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	+	
BDP21 – Natural Environment	+	
BDP22 – Climate Change	0	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	0	
BDP25 – Health and Well Being	0	

**Table 4-7 SA Objective EV1: To conserve and enhance biodiversity and geodiversity**

Receptors:

- District's ecology
- Designated sites of nature conservation
- BAP species and habitats
- Aquatic ecosystems

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	A number of policies aim to have positive effects upon conserving and enhancing biodiversity in the District, most notably in rural areas. However, there is some uncertainty as many biodiversity impacts relate to site specific development. Nonetheless, it is considered on balance that the Bromsgrove District Plan would lead to a likely <b>cumulative positive</b> impact upon the objective.
BDP2 – Settlement Hierarchy	?	
BDP3 – Future Development	?	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	?	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	0	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	0	

<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP14 – Designated Employment	0	
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	+	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	0	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	++	
BDP22 – Climate Change	0	
BDP23 – Water management	+	
BDP24 – Green Infrastructure	++	
BDP25 – Health and Well Being	+	

**Table 4-8 SA Objective EV2: Ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land. Land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.**

Receptors:

- Countryside
- Green spaces
- Green Belt
- Agricultural land

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	The performance of the policy is mixed with a poor performance against housing related policies due to the loss of greenfield land for development. However, many of the policies aim to protect green space and the countryside and as such, the Bromsgrove District Plan is likely to have an overall <b>positive cumulative</b> impact upon this objective.
BDP2 – Settlement Hierarchy	-	
BDP3 – Future Development	0	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	-	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	- -	
BDP6 – Infrastructure Contributions	0	
BDP7 – Housing Mix & Density	+	
BDP8 – Affordable Housing	-	
BDP9 – Rural Exception Sites	-	
BDP10 – Homes for the Elderly	-	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	-	
BDP12 – Sustainable Communities	0	

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP13 - New Employment Development	-	
BDP14 – Designated Employment	0	
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	+	
BDP17 – Town Centre Regeneration	++	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	+	
BDP21 – Natural Environment	++	
BDP22 – Climate Change	+	
BDP23 – Water management	+	
BDP24 – Green Infrastructure	++	
BDP25 – Health and Well Being	++	

**Table 4-9 SA Objective EV3: Safeguard and strengthen landscape and townscape character and quality**

Receptors:

- District's open space
- Green Belt

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	A number of policies place a strong emphasis upon protection of the District's landscapes, either directly, or through policies relating to good design or the focus on the regeneration on the town centre. The policies relating to housing or employment do not perform well against this objective due to development on greenfield land. However, on balance the Bromsgrove District Plan is likely to have <b>positive cumulative</b> effects upon the objective.
BDP2 – Settlement Hierarchy	-	
BDP3 – Future Development	-	
BDP4 - Green Belt	++	
BDP5A – Bromsgrove Town Expansion Sites	-	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	-	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	?	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	-	
BDP10 – Homes for the Elderly	?	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	-	
BDP12 – Sustainable Communities	?	
BDP13 - New Employment Development	0	
BDP14 – Designated Employment	0	
BDP15 – Rural Renaissance	?	

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP16 – Sustainable Transport	+	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	+	
BDP21 – Natural Environment	++	
BDP22 – Climate Change	0	
BDP23 – Water management	+	
BDP24 – Green Infrastructure	++	
BDP25 – Health and Well Being	++	

**Table 4-10 SA Objective EV4: Conserve, protect and enhance the historic, architectural, cultural and built environment heritage and seek well-designed, high quality built environment in new development proposals**

Receptors:

- District's ecology
- Designated sites of nature conservation interest
- BAP species and habitats
- Aquatic ecosystems

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	0	A number of policies place a strong emphasis upon protection of the District's heritage, either directly, or through policies relating to good design. On balance the Bromsgrove District Plan is likely to have <b>positive cumulative</b> effects upon the objective.
BDP2 – Settlement Hierarchy	0	
BDP3 – Future Development	0	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	0	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	0	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	?	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	+	



Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP13 - New Employment Development	0	
BDP14 – Designated Employment	0	
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	0	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	0	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	+	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	+	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	?	

**Table 4-11 SA Objective EV5: To manage waste in accordance with the waste hierarchy 1) Prevention, 2) Preparing for reuse, 3) Recycling, 4) Other recovery, 5) Disposal**

Receptors:

- Countryside
- Green spaces
- Green Belt
- Agricultural land

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	0	In many instances policies will have a neutral impact on waste management but the climate change policy for instance can make a significant impact on waste management within the district. On balance, the Bromsgrove District Plan is likely to result in a <b>positive cumulative</b> impact upon waste issues.
BDP2 – Settlement Hierarchy	0	
BDP3 – Future Development	0	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	0	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	0	
BDP14 – Designated Employment	0	

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	0	
BDP17 – Town Centre Regeneration	?	
BDP18 – Local Centres	0	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	+	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	++	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	0	
BDP25 – Health and Well Being	0	

**Table 4-12 SA Objective EV6: Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas**

Receptors:

- Human population
- New and existing properties

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	0	All of the policies related to the natural environment and the retention of open space perform well against this objective. Most relevant is BDP23 which directs development to areas of low flood risk. The Bromsgrove District Plan would have a <b>positive cumulative</b> impact upon this objective.
BDP2 – Settlement Hierarchy	?	
BDP3 – Future Development	0	
BDP4 - Green Belt	0	
BDP5A – Bromsgrove Town Expansion Sites	0	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	0	
BDP6 – Infrastructure Contributions	0	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	0	
BDP14 – Designated Employment	0	

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	0	
BDP17 – Town Centre Regeneration	0	
BDP18 – Local Centres	0	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	+	
BDP23 – Water management	++	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	+	

**Table 4-13 SA Objective EV7: Promote resource efficiency and energy generated from renewable energy and low carbon sources**

Receptors:

- Climate change
- Natural Resources

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	A number of policies specifically contribute to the achievement of this objective by promoting development in the most sustainable locations. BDP22 has the greatest positive impact on the objective as it encourages the use of energy from renewable sources within developments. The Bromsgrove District Plan is likely to have a <b>positive cumulative</b> impact upon the objective.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	0	
BDP4 - Green Belt	0	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	0	
BDP6 – Infrastructure Contributions	0	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	+	
BDP9 – Rural Exception Sites	+	
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	+	
BDP13 - New Employment Development	+	
BDP14 – Designated Employment	+	
BDP15 – Rural Renaissance	0	

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP16 – Sustainable Transport	+	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	++	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	0	
BDP25 – Health and Well Being	0	

Table 4-14 SA Objective EV8: Protect and enhance the quality of water, soil and air

Receptors:

- Air quality
- Human Population

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	A number of policies specifically contribute to the achievement of this objective. On balance, the Bromsgrove District Plan is likely to have a <b>positive cumulative</b> impact upon the objective.
BDP2 – Settlement Hierarchy	0	
BDP3 – Future Development	0	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	0	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	0	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	+	
BDP13 - New Employment Development	?	
BDP14 – Designated Employment	?	



<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	++	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	+	
BDP22 – Climate Change	+	
BDP23 – Water management	++	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	0	

**Table 4-15 SA Objective EV9: Reduce causes of and adapt to the impacts of climate change**

Receptors:

- Human population
- Climate change
- Natural resources

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	A number of policies specifically contribute to the achievement of this objective with most the relevant being BDP22. On balance, the Bromsgrove District Plan is likely to have a <b>positive cumulative</b> impact upon the objective.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	0	
BDP4 - Green Belt	+	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	+	
BDP9 – Rural Exception Sites	+	
BDP10 – Homes for the Elderly	+	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	+	
BDP13 - New Employment Development	+	
BDP14 – Designated Employment	+	

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP15 – Rural Renaissance	+	
BDP16 – Sustainable Transport	+	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	+	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	+	
BDP22 – Climate Change	++	
BDP23 – Water management	+	
BDP24 – Green Infrastructure	+	
BDP25 – Health and Well Being	0	

**Table 4-16 SA Objective EC1: Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural**

Receptors:

- Human population
- District's economy
- Labour market

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	Some policies provide directly for the development of skills and/or education. On balance there would be an overall <b>positive cumulative</b> impact in terms of quality educational opportunities for all through the Bromsgrove District Plan.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	+	
BDP4 - Green Belt	0	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	+	
BDP14 – Designated Employment	+	

<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	0	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	0	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	0	
BDP23 – Water management	+	
BDP24 – Green Infrastructure	0	
BDP25 – Health and Well Being	0	

**Table 4-17 SA Objective EC2: Promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives**

Receptors:

- District's economy

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	+	Both of the employment policies provide directly for the development of new technologies and/or resource efficient technologies and in addition some may have an indirect positive impact.  On balance there would be an overall <b>positive cumulative</b> impact in terms of the development of new technologies through the Bromsgrove District Plan.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	+	
BDP4 - Green Belt	0	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	0	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	++	
BDP14 – Designated Employment	++	
BDP15 – Rural Renaissance	0	
BDP16 – Sustainable Transport	+	

<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	0	
BDP19 – High Quality Design	+	
BDP20 – Management of The Historic Environment	+	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	0	
BDP23 – Water management	+	
BDP24 – Green Infrastructure	0	
BDP25 – Health and Well Being	0	

**Table 4-18 SA Objective EC3: To raise the skills levels and qualifications of workforce and quality of education opportunities for all**

Receptors:

- Human population
- District's economy
- Labour market

Core Strategy Policy	Assessment	Commentary and Overall Assessment
BDP1 – Sustainable Development principles	0	None of the policies provide directly for the development of skills and/or education although a number may have an indirect positive impacts primarily through the location of development in sustainable locations that are near educational establishments.  On balance there would be an overall <b>positive cumulative</b> impact in terms of the quality of educational opportunities for all through the Bromsgrove District Plan.
BDP2 – Settlement Hierarchy	+	
BDP3 – Future Development	+	
BDP4 - Green Belt	0	
BDP5A – Bromsgrove Town Expansion Sites	+	
BDP5B – Other Development Sites	n/a	
RCBD1 – Redditch Cross Boundary Development	+	
BDP6 – Infrastructure Contributions	+	
BDP7 – Housing Mix & Density	0	
BDP8 – Affordable Housing	0	
BDP9 – Rural Exception Sites	0	
BDP10 – Homes for the Elderly	0	
BDP11 – Accommodation for Gypsies, Travellers and Showpeople	0	
BDP12 – Sustainable Communities	0	
BDP13 - New Employment Development	+	
BDP14 – Designated Employment	+	
BDP15 – Rural Renaissance	+	



<b>Core Strategy Policy</b>	<b>Assessment</b>	<b>Commentary and Overall Assessment</b>
BDP16 – Sustainable Transport	0	
BDP17 – Town Centre Regeneration	+	
BDP18 – Local Centres	0	
BDP19 – High Quality Design	0	
BDP20 – Management of The Historic Environment	0	
BDP21 – Natural Environment	0	
BDP22 – Climate Change	0	
BDP23 – Water management	0	
BDP24 – Green Infrastructure	0	
BDP25 – Health and Well Being	0	

## 5 Analysis of Policy Performance

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5.1 It is important to compare the performance of the Bromsgrove District Plan policies to not only identify the strongest policies within the strategy but also highlight where policies do not perform so well against certain types of objectives. For example, a policy on open space may perform strongly against environmental objectives but have a weaker impact on economic objectives.

5.2 To undertake this comparison the following scoring system has been used:

++	= 2
+	= 1
0/?	= 0
-	= -1
--	= -2

5.3 The comparison table is included as appendix B. The Table identifies that the following 3 policies had the highest overall scores against the SA objectives:

- CP19 High Quality Design (17)
- CP15 Town Centre Regeneration (25)
- BDP1 Sustainable Development Principles (16)

5.4 *BDP19 High Quality Design*

5.5 This policy achieved a high score against the SA objectives performing best against the environmental and social objectives. This highlights

how good design can deliver a range of social benefits including creating vibrant and locally distinctive communities, encouraging safety by design, minimise car usage and hence improving resident's health and well-being.

5.6 The policy on high quality design has the ability to deliver a variety of environmental benefits including the creation of living environments that respect the landscape, enhance built heritage, incorporate measures to reduce the impact of climate change and reduce CO2 emissions by encouraging more sustainable lifestyles. The policy also promotes tree planting and retaining trees that already exist on-site to help reduce the impacts of pollutants.

5.7 There are also some economic benefits from high quality design as high quality built environments can assist the marketing of the District as a good place to work and do-business. This can encourage the creation of new businesses and investment in the District and hence improve economic growth in the long-term.

#### 5.8 *BDP17 Town Centre Regeneration*

5.9 This policy also achieved a high score against the SA objectives however the policies performance was more consistent against the social, economic and environmental objectives and therefore could be considered to be the most balanced policy.

5.10 The regeneration of Bromsgrove Town Centre has the potential to have a significant economic impact on the town through the creation of employment for local people and promote economic growth, particularly if Bromsgrove Town becomes more established as a retail centre for the District. This can help to improve the vitality of the Town Centre and have knock-on benefits in terms of marketing Bromsgrove as a good place to live, work and do business.

- 5.11 This policy has the ability to deliver a range of social benefits. The policy aims to deliver housing in the Town Centre which will help meet local needs. This has the added benefit of creating a level of natural surveillance in the Town Centre will help to reduce crime and the fear of crime. The regeneration should lead to an increased range of services and facilities available to residents which will lead to more people visiting the Town Centre rather than making less sustainable trips to other centres outside the District. The Town Centre regeneration has involved regular consultation with residents and is therefore likely to engender a sense of pride and ownership.
- 5.12 The policy also performs well against environmental objectives. This is primarily because development is focused away from greenfield land ensuring the protection natural landscapes and biodiversity. However, there are also some direct benefits such as the naturalization of the Spadesbourne Brook and the opportunity to enhance the appearance and setting of the conservation area and a number of listed buildings.
- 5.13 *BDP1 Sustainable Development Principles*
- 5.14 This policy performed particularly well against social, environmental and economic objectives due to the wide over-arching nature of the policy.
- 5.15 The policy has a direct impact on the achievement of a number of the environmental objectives as the quality of the natural environment is a key consideration. This means that there could be positive impacts on biodiversity, landscape and also improved green infrastructure linkages. The policy also addresses flood risk and climate change. The policy also performs well against EV6 as there is a specific reference to the protection of historic assets.
- 5.16 The policy also performs strongly against social objectives. The policy will ensure proposals have access to public transport and local facilities

and services. This increased accessibility should help to reduce social exclusion.

- 5.17 The policy also performs well against some economic objectives. The economic benefits of development for the district are a key consideration. This could benefit the knowledge driven economy.

## 6 Conclusions

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- 6.1 This report constitutes the assessment of the Bromsgrove District Plan and makes a number of recommendations for each policy throughout. The comparison and assessment of District Plan policies has highlighted that best performing policies are follows:
- High Quality Design
  - Town Centre Regeneration
  - Sustainable Development Principles
- 6.2 The policy on High Quality Design achieved a high overall score highlighting the many social and environmental benefits of good design. However, it could be argued that the most balanced policy is on Town Centre Regeneration as it performs consistently well against social, environmental, economic objectives. The regeneration of the town centre has economic benefits through the creation of jobs and the attraction of inward investment. This delivers social benefits by providing access to a wider range of facilities and services, developing housing for local needs which has the added benefit of leading to greater natural surveillance in the town centre which could reduce crime levels. The environmental benefits are also significant although less direct. The focus of development in the town centre protects greenfield land, natural landscapes and biodiversity. The regeneration of the town centre could also lead to improvements to the historic environment with enhancements to the setting of the town centre conservation area.
- 6.3 The analysis undertaken highlights that all policies achieved an overall positive score against the sustainability objectives. This identifies the overarching sustainability gains that will be delivered when the Bromsgrove District Plan is adopted. The detailed assessment also tested all of the policies together against each SA objective in turn. This

has shown that the Bromsgrove District Plan has a cumulative positive impact against each of the sustainability objectives.

#### **6.4 Key Recommendations**

6.5 Whilst the policies performed well against SA objectives there are opportunities for further improvement. Many of the recommendations in this report constitute minor changes of wording to the policies in order to add strength or clarity to them. These changes have been duly made before public consultation on the Publication version of the Bromsgrove District Plan.

6.6 The onus is on successful monitoring of controls and regulations on individual proposals to ensure that individual sites are not developed in an unsustainable manner. The annual monitoring of SA indicators will highlight the performance of Bromsgrove District Plan policies to ensure the expected social, economic and environmental improvements are taking place. This will also identify any areas of weakness and appropriate interventions could then be made.

## Appendix A

### Assessment matrices

<b>BDP1 Sustainable Development Principles</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The presumption in favour of sustainable development may mean that a higher proportion of applications could be looked upon favourably, some of which could include a proportion of affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy promotes development that has good access to services.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The policy promotes development that has good access to services.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy does not directly affect this objective
SO5 Increase sustainable travel choices and move towards more sustainable travel	++	The policy will ensure that new development has good access to public transport options.



<b>BDP1 Sustainable Development Principles</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
patterns		
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	This policy does not directly address community involvement
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	+	The policy clearly highlights the importance of protecting and enhancing biodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	The policy clearly highlights the importance of protecting and enhancing biodiversity. The policy also highlights that the presumption in favour of sustainable development does not override Green Belt policy.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	The importance of green infrastructure is highlighted within the policy.
EV4 Conserve, protect and enhance the architectural,	+	The policy takes into account the importance of historic assets.

<b>BDP1 Sustainable Development Principles</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	This policy includes a specific reference to the waste hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	+	This policy highlights that proposals should have regard to the level of flood risk.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The policy highlights that new proposals should have regard to the causes and impacts of climate change. This could be achieved through energy generation from renewable sources.
EV8 Protect and enhance the quality of water, soil and air	+	The policy highlights the importance of infrastructure providers such as Severn Trent being able to accommodate growth without a reduction in water quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	The policy promotes development in the most suitable and sustainable locations that could increase the use of public transport and potentially reduce emissions.
Economic Objectives		

<b>BDP1 Sustainable Development Principles</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	The policy seeks to improve economic conditions in the area which could benefit the knowledge driven economy.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not directly affect this objective
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy does not directly affect this objective

<b>BDP 2 Settlement Hierarchy</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	All areas would deliver an element of affordable housing in accordance with the NPPF and incorporate high quality design principles. The policy promotes rural exception schemes to deliver affordable housing in rural areas.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	Development is encouraged in sustainable locations and there are likely to be positive benefits in terms of human health and well-being.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	This policy aims to allocate growth in areas with a certain level of existing services and infrastructure. New growth is likely to support the retention of such services and may support new local services and facilities being provided to cater for increased population.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The policy has no clear effect on this objective
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	0	Housing is being distributed in sustainable locations which may reduce the need to travel and increased numbers may mean that provision of public transport becomes more viable, encouraging more people to choose more sustainable modes of transport.
SO6 To provide opportunities for communities to participate and contribute to	0	The same opportunities for consultation and community involvement apply to each area.

BDP 2 Settlement Hierarchy		
SA Objectives	SA Effects	Commentary
decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	?	The distribution of housing may have implications on biodiversity and geodiversity but the implications are at present unknown and would need to be addressed on a site by site basis.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	0	The policy promotes the use of brownfield land but there is only a limited amount of suitable brownfield land meaning that a high percentage on new housing will be built on greenfield land. There is also likely to be some agricultural land loss. The settlement hierarchy seeks to ensure growth is focussed in sustainable locations thereby minimising Green Belt land take.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The loss of greenfield land required to meet housing needs may impact upon landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development	0	The presumption in favour of development of urban areas has the potential to adversely impact upon the historic urban environment, although this would entirely depend upon exactly where and how sites were developed. In contrast, enhancement of an historic setting may occur as a result of development. This policy is therefore likely to have a neutral impact.

BDP 2 Settlement Hierarchy		
SA Objectives	SA Effects	Commentary
proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	No clear links between the locations of growth and waste management. Waste minimisation measures can be incorporated in any location.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	The location of development will have an impact on flood risk but can be addressed on site by site basis through the use of water management measures such as SuDS, water recycling, use of permeable surfaces and rainwater harvesting.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Focussing development in and around Bromsgrove Town which is better connected by public transport and the proximity of people to jobs and services encourages walking and cycling instead of private car use. This may result in a decrease in greenhouse gas emissions and energy use. Also due to the concentrations of growth this may render renewable energy schemes more economically viable. All areas can promote the use of zero or low carbon energy generation technologies.
EV8 Protect and enhance the quality of water, soil and air	?	All development has the potential to impact upon water quality and increase demand for water usage, particularly in the targeted urban areas. This does not mean that individual sites cannot be developed without affecting water quality. Water use must be managed in a sustainable manner, regardless of whether it is an urban or rural area.
EV9 Reduce causes of and adapt to the impacts of climate change	0	All the areas have the potential to incorporate energy efficiency measures and to incorporate appropriate future proofing design measures. The settlement hierarchy ensures that development will generally occur in the most sustainable locations where there is frequent public transport. Reduced car usage could

BDP 2 Settlement Hierarchy		
SA Objectives	SA Effects	Commentary
		reduce emissions and impact positively on this objective.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	Growth will be primarily located in Bromsgrove Town. This could attract inward investment and therefore boost the local economy and create jobs. A more limited amount of associated employment is likely to be generated in rural areas.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	Increased growth levels may stimulate the economy and increase job choice and educational opportunities.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	The settlement hierarchy ensures that development will occur in sustainable locations that have good access in educational opportunities. Therefore thee could be a positive impact on this objective.

<b>BDP3 Future Housing and Employment Growth</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy attempts to address housing needs in both Bromsgrove and Redditch.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	This policy has no direct affect on this objective.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	Housing development in the district is likely to increase the population which could lead to further people using facilities in the Town Centre and local centres. This could improve the vitality and viability of these centres.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy has no direct affect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Housing levels proposed are derived from the principle of being able to provide new housing in sustainable locations in the first instance.
SO6 To provide opportunities for communities to participate and	0	This policy has no direct affect on this objective



BDP3 Future Housing and Employment Growth		
SA Objectives	SA Effects	Commentary
contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	?	The levels of housing growth may have implications for biodiversity and geodiversity. However the implications are at present unknown and would need to be addressed on a site by site basis.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	--	The policy results in the loss of significant amounts of both greenfield and Green Belt land.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The loss of greenfield land required to meet housing needs may impact upon landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new	0	This policy has no direct affect on this objective

<b>BDP3 Future Housing and Employment Growth</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	There are no clear links between the amount of housing growth and waste management
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy has no direct affect on this objective. The location of development will be relevant but can be addressed by water management techniques such as SuDs, recycling and other innovative methods.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	This policy has no direct affect on this objective.
EV8 Protect and enhance the quality of water, soil and air	0	This policy has no direct affect on this objective.
EV9 Reduce causes of and adapt to the impacts of climate change	0	This policy has no direct affect on this objective.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban	+	Increased levels of growth could attract inward investment and therefore boost the local economy and create jobs.

<b>BDP3 Future Housing and Employment Growth</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	The policy promotes employment growth a proportion of which is likely to be in the new technology sector.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Increased growth level may stimulate the economy and increase job choice and educational opportunities.

BDP4 Green Belt		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy acknowledges that the District has not identified sufficient land to accommodate needs till the end of the plan period and beyond, which will have an impact on the provision of affordable housing. However, a Green Belt Review is proposed in the policy to prevent any shortfall. The policy will therefore lead to the provision of further affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	Protection of the Green Belt from inappropriate development, preservation of the countryside and the opportunities for rural leisure activities which it provides are likely to have benefits for health and also preserve accessibility to the countryside.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The proposed Green Belt Review will lead to the identification of sites for development on the edge of settlements. These sites will be well located to access local services and facilities. Green Belt policy will prevent unsustainable development in isolated rural locations.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The policy has no direct effect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The proposed Green Belt Review will lead to the identification of sites for development on the edge of settlements. These sites will be well located to access public transport.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life,	0	The policy itself has no direct effect on this objective.

<b>BDP4 Green Belt</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	+	Many of the biodiversity and geodiversity rich areas in the District fall within the Green Belt. The policy focuses on preserving the Green Belt. Although some Green Belt will be lost to development through the Green Belt Review this can be done without harming biodiversity. With the vast majority of areas remaining untouched it is considered that the policy is likely to have a positive impact on conserving biodiversity and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	The policy aims to protect the Green Belt from inappropriate development. Although the policy highlights the need for a Green Belt review meaning some Green Belt land will be lost to development. Efforts have been made to maximise the use of brownfield land prior to the Green Belt Review. All the best and most versatile agricultural land in the District is within the Green Belt. Overall the policy therefore has a positive impact on this objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	The policy aims to protect the Green Belt from inappropriate development. One of the purpose of Green Belt is to preserve the setting and special character of historic towns. Also, most of the areas assessed in the Worcestershire Landscape Character Assessment are within the Green Belt. The policy therefore is likely to have a positive impact on this objective.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	+	This policy will prevent inappropriate development in the Green Belt. Many of the Districts Rural villages are "washed over" Green Belt, some are conservation areas and some contain listed buildings. The policy will also protect more remotely lying historic farmsteads which are historic assets. This policy will therefore afford added protection for these buildings. The policy will also protect the historic landscape which is albeit not directly the aim behind this objective.
EV5 To manage waste in accordance	0	The policy has no direct effect on this objective.

BDP4 Green Belt		
SA Objectives	SA Effects	Commentary
with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal		
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	The policy has no direct effect on this objective.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The policy has no direct effect on this objective.
EV8 Protect and enhance the quality of water, soil and air	+	The policy will protect the Green Belt which comprises approximately 91% of the District and surrounds all the settlements. Therefore protection of such a large proportion of the environment is likely to protect the quality of water soil and air.
EV9 Reduce causes of and adapt to the impacts of climate change	+	The policy protects the countryside from inappropriate development. Green space absorbs greenhouse gas and hence the policy is likely to have a positive impact on this objective.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	The policy has no direct effect on this objective.
EC2 promote and support the development of new technologies of high value and low impact	0	The policy has no direct effect on this objective.

BDP4 Green Belt		
SA Objectives	SA Effects	Commentary
especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The policy has no direct effect on this objective.

<b>BDP5A Bromsgrove Town Expansion Sites</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy ensures that 40% affordable housing will be delivered on expansion sites to help meet local needs.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	Bromsgrove Town is considered to be the most sustainable location for growth and therefore there are likely to be positive benefits in terms of human health and well-being.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The strategic sites will provide a range of facilities ensuring that all new residents have good access.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The policy addresses high quality design which could help to reduce crime and potentially the fear of crime.
SO5 Increase sustainable travel	+	The policy highlights that transport strategies will be developed for the expansion sites that maximise the use of sustainable modes of transport. The policy makes



BDP5A Bromsgrove Town Expansion Sites		
SA Objectives	SA Effects	Commentary
choices and move towards more sustainable travel patterns		specific reference to the need for significant improvements in passenger transport with better links to the train station and the town centre.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The policy has no effect on this objective
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	The policy intends to provide opportunities for wildlife and retain hedgerows on the expansion sites. It is hoped that there wouldn't be a negative impact.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	All expansion sites are on greenfield land and therefore it is inevitable that this will result in the loss of greenfield land. All realistic alternatives have been considered and these are the most appropriate sites around the town.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The loss of greenfield land around the town is required to meet housing needs may impact upon landscape character and quality.

BDP5A Bromsgrove Town Expansion Sites		
SA Objectives	SA Effects	Commentary
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	The policy promotes high quality design which will ensure development retains the character of Bromsgrove. None of the expansion sites will have a direct impact upon any listed buildings or conservation areas.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	The policy makes an explicit reference to the waste hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	There are small areas of flood risk within 2 of the expansion sites however the policy makes it clear that mitigation will be required to address these matters.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The policy promotes the use of zero or low carbon energy generation technologies. Maximising the use of sustainable modes of transport is also encouraged.
EV8 Protect and enhance the quality of water, soil and air	0	Growth is focussed on Bromsgrove Town which is better connected by public transport and the proximity of people to jobs and services encourages walking and cycling instead of private car use, may result in a decrease in traffic congestion and air pollution. The policy highlights that air quality will need to be

<b>BDP5A Bromsgrove Town Expansion Sites</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
		addressed due to the close proximity of the motorway. All development has the potential to impact upon water quality and increase demand for water usage but measures will be in place.
EV9 Reduce causes of and adapt to the impacts of climate change	+	Focussing development on Bromsgrove Town which is better connected by public transport and the proximity of people to jobs and services encourages walking and cycling instead of private car use, may result in a decrease in greenhouse gas emissions and energy use.  The use of renewable energy on site is promoted within the policy.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	An element of employment development is included within the expansion sites policy which will benefit the local economy.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	An element of employment development is included within the expansion sites policy which will benefit the local economy and create jobs.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Providing housing close to existing educational facilities gives people greater opportunities to obtain skills and qualifications.

<b>RCBD1 Redditch Cross Boundary Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy ensures that a flexible range of house types is delivered with 40% being affordable housing on all expansion sites with tenures matched to help meet local needs. High quality and locally distinctive developments will ensure safe and pleasant environment. This score is consistent with RBC SA on RBC adjacent Strategic Sites where a significant positive effect is predicted.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The edge of Redditch Town is considered to be a sustainable location for growth and therefore the overall aim of the policy which is the development of new housing which meets local housing needs in these localities are likely to bring positive benefits in terms of human health and well-being. With the addition of the Redditch Cross Boundary Development Policy which includes an extension of Brockhill East into Bromsgrove District, the policy itself adds more beneficial effects including provision of recreation and open space.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	<p>The strategic sites will provide a range of facilities ensuring that all new (and existing) residents have good access to services and facilities. Improvements to passenger transport will result in better access to facilities in Redditch Town Centre thereby contributing to its vitality.</p> <p>With the addition of the Redditch Cross Boundary Development Policy which includes an extension of Brockhill East into Bromsgrove District, the policy itself adds more beneficial effects including seeking public transport and facilitating ease of access to Redditch town centre. Also more positive effects are felt with the addition of the policy because of the provision of new local retail facilities where there is current need to meet the demand of this number of future residents. The policy also includes the Foxlydiate site, where provision of new local retail facilities adjacent to the Webheath area add a positive effect</p>

<b>RCBD1 Redditch Cross Boundary Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
SO4 Reduce crime, fear of crime and anti social behaviour	+	The policy emphasises permeable and connected layouts ensuring high quality design which implicitly includes designing out crime principles and design that reduce fear of crime in the built environment. With the addition of the Redditch Cross Boundary Development Policy which includes an extension of Brockhill East into Bromsgrove District, the policy itself adds more beneficial effects including requirements for high quality design and other design principles.
SO5 Increased sustainable travel choices and move towards more sustainable travel patterns	+	The policy highlights that transport strategies will be developed for the expansion sites that maximise the use of sustainable modes of transport.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The policy has no clear effect on this objective. Redditch SA scores a positive against this objective for all Redditch Strategic Sites. Assessing a sites sustainability and the policy sustainability will be different in this case because with a site, a planning application will be required which encourages include public participation and feedback.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	The policy sets out the need to provide a strategy and management plan for green infrastructure and ensure any potential adverse impacts on biodiversity and geodiversity would be satisfactorily protected .
EV2 Ensure efficient use of land through	--	All expansion sites are Green Belt land and land of good agricultural quality therefore it is inevitable that

<b>RCBD1 Redditch Cross Boundary Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.		development will result in some loss. However, all realistic alternatives have been considered and these are the most appropriate sites around Redditch Town.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The loss of land around the town is required to meet housing needs which may impact upon landscape character and quality. Design of new development should seek to mitigate this, improving townscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	The policy promotes high quality design which will ensure development retains the character of Redditch. There are a small number of historic assets and development would need to be sensitively designed so as not to adversely impact on the setting of these heritage assets.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse,	0	The policy makes refers to the need to ensure that sufficient capacity of the sewerage systems for wastewater collection. It also refers to the use of SuDS which embeds waste hierarchy principles.

RCBD1 Redditch Cross Boundary Development		
SA Objectives	SA Effects	Commentary
3) recycling, 4) other recovery, 5) disposal		
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	There are small areas of flood risk within the 2 expansion sites however the policy makes it clear that mitigation will be required to address these matters.
E7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	Maximising the use of sustainable modes of transport is encouraged in the policy as well as encouragement for a Green Infrastructure network which maximises biodiversity and recreation.
E8 Protect and enhance the quality of water, soil and air quality	0	<p>The policy seeks to encourage improvements in passenger transport to make this a more attractive alternative than use of the private car, particularly for short trips. Also the proximity of people to jobs and services encourages walking and cycling instead of private car use and this may result in a decrease in traffic congestion and air pollution.</p> <p>All development has the potential to impact upon water quality and increase demand for water usage but mitigation measures will be in place to control this.</p> <p>With the addition of the Redditch Cross Boundary Development Policy which includes an extension of Brockhill East into Bromsgrove District, the policy itself adds more beneficial effects including mitigating against the development of a site, and encourages improvements in passenger transport.</p>

**RCBD1 Redditch Cross Boundary Development**

<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
E9 Reduce causes of and adapt to the impacts of climate change	+	<p>The policy seeks to encourage improvements in passenger transport to make this a more attractive alternative than use of the private car, particularly for short trips. Also the proximity of people to jobs and services encourages walking and cycling instead of private car use and this may result in a decrease in greenhouse gas emissions and energy use.</p> <p>With the addition of the Redditch Cross Boundary Development Policy which includes an extension of Brockhill East into Bromsgrove District, the policy itself adds more beneficial effects including encouraging improvements in passenger transport.</p>
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	<p>The Redditch SA for Webheath Strategic Site scores no effect for this as the objective is not related to the delivery of the site. The Redditch Cross Boundary Development Policy however scores positively because the sites are well located to access employment opportunities in Redditch as a whole. Also with the delivery of the Redditch Cross Boundary Policy, the objectively assessed needs for Redditch's housing growth can be met, and thus a job balance can be achieved, a labour supply sustained, employment can be met without increasing reliance on out-commuting and the working age population can be better sustained by meeting housing needs.</p>
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	<p>The sites are well located to access employment opportunities in Redditch. The delivery of the Redditch Cross Boundary Policy enables the objectively assessed needs for Redditch's housing growth to be met, and thus demand for employment continues to be sustained and churn within the employment market will also continue, offering opportunities for high value and low impact, resource efficient employment redevelopment.</p>



<b>RCBD1 Redditch Cross Boundary Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Providing housing close to existing educational facilities and providing educational facilities as part of new development gives people greater opportunities to obtain skills and qualifications.

### **Summary**

There are differences in the way Bromsgrove and Redditch Councils assess the policies in their respective plans through the Sustainability Appraisal process. The assessment of the Redditch Cross Boundary Development Policy has been completed in order to complement the Bromsgrove SA and has been checked for consistency with aspects of the Redditch SA, such as the Strategic Site appraisal of the Brockhill East Strategic Site and Webheath Strategic Site within Redditch. Although the scoring is expressed in a different way in the assessments, there are generally consistencies in the way in which effects are predicted against the SA Objectives. Where a score against an Objective appears to be different, the commentary in the BDC SA above and the Assessment of Options in the RBC SA explains how they are judged to be consistent.

<b>BDP6 Infrastructure Contributions</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	Developer contributions towards affordable housing will be sought.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy has the potential to contribute towards this health and well being objective in that it will seek contributions from developers towards infrastructure provision including health facilities.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	This policy positively contributes towards this objective as it advocates adequate infrastructure, including local services and facilities, should exist to support new development at an appropriate stage of development.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Developer contributions could be sought towards policing and community safety schemes, which are directly related to reducing crime and fear of crime levels.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	This policy is likely to secure developer contributions in new developments towards transport infrastructure.
SO6 To provide opportunities for communities to participate and	0	This policy does not directly impact on this objective

<b>BDP6 Infrastructure Contributions</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	+	This policy is likely to attract developer contributions towards environmental mitigation, biodiversity and air quality all of which are likely to have a positive impact on this objective.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	0	This policy does not directly affect this objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	This policy has the potential to safeguard landscape character and quality via developer contributions towards environmental mitigation
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new	+	This policy has the potential to conserve the historic environment by attracting developer contributions towards the public realm.

<b>BDP6 Infrastructure Contributions</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	This policy is likely to secure developer contributions in new developments towards waste management infrastructure.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	The policy does not directly impact on this objective.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The policy does not directly impact on this objective.
EV8 Protect and enhance the quality of water, soil and air	+	This policy has the potential to protect and enhance the quality of water, soil and air quality via developer contributions towards environmental mitigation.
EV9 Reduce causes of and adapt to the impacts of climate change	+	This policy has the potential to reduce causes of and adapt to the impacts of climate change via developer contributions towards air quality and environmental mitigation
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share	+	This policy will secure developer contributions in new developments towards education/skills infrastructure.

<b>BDP6 Infrastructure Contributions</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
the benefits, urban and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy is unlikely to impact on this objective
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	The Community Infrastructure Levy is likely to secure developer contributions in new developments towards education/skills infrastructure.

<b>BDP7 Housing Mix and Density</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	This policy will fulfil this objective as it promotes a mix of housing types which cater for the needs of all, such as singles, couples, families, young people, elderly and people with special needs.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	This policy will bring people from different incomes and different social groups together. This will promote better understanding and hence harmony and well-being among different groups.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	This policy will bring people from different incomes and different social groups together, so everyone will have equitable access to local services and facilities.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Creating mixed communities may improve relationships between different groups of people and with people living different lifestyles this will improve the levels natural surveillance in areas and potentially deter crimes.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The efficient use of land will reduce the need to travel and improve the viability of local services such as corner shops.
SO6 To provide opportunities for communities to participate and contribute to	0	This policy does not provide opportunities for community participation.

<b>BDP7 Housing Mix and Density</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	0	This policy does not contribute to biodiversity and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	?	The policy focuses on the need to build smaller properties and ensuring the efficient use of land. Making the best use of land will reduce the level of greenfield development land required, which helps to minimise landscape impact.
EV3 Safeguard and strengthen landscape and townscape character and quality	?	Making efficient use of land could mean that the level of greenfield development land required is reduced, which could help to minimise landscape impact.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development	0	The emphasis on a high quality design outcome means there should not be a harmful impact on the historic environment.

<b>BDP7 Housing Mix and Density</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy does not impact on waste management.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not address flood risk.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	This policy does not address the energy efficiency issue of development.
EV8 Protect and enhance the quality of water, soil and air	0	This policy does not affect the quality of water, soil and air.
EV9 Reduce causes of and adapt to the impacts of climate change	0	This policy does not address the causes and impacts of climate change.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban	0	This policy does not affect the development of a knowledge driven economy.



<b>BDP7 Housing Mix and Density</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not affect the development of new technologies.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy does not affect the skills levels and qualifications of workforce.

<b>BDP8 Affordable Housing</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The provision of affordable housing to meet local needs is the objective of this policy.
SO2 To improve the health and well-being of the population and reduce inequalities in health	?	The provision of affordable housing does not directly affect health although it could be argued that if people can afford a decent place to live then this could improve their well-being. The level of certainty would be low.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The provision of affordable homes can reduce social exclusion through reducing barriers to housing for poorer sectors of society.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy has no direct impact upon this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	0	This policy has no direct impact upon this objective.
SO6 To provide opportunities for	0	This policy does not provide opportunities for community participation.

<b>BDP8 Affordable Housing</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	0	This policy has no direct impact on biodiversity and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	0	The policy has no direct impact on this objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	0	The policy has no direct impact on this objective.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high	0	The provision of affordable housing itself as part of a wider mixed-use development is unlikely to affect this objective.

<b>BDP8 Affordable Housing</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy does not affect the waste management.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not impact on flood risk.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Affordable housing schemes need to achieve at least Level 3 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units.
EV8 Protect and enhance the quality of water, soil and air	0	This policy does not impact on water, soil and air quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	Affordable housing schemes need to achieve at least Level 3 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. This policy can therefore directly reduce causes of and adapt to the impacts of climate change.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the	0	This policy has no impact on the development of a knowledge driven economy.

<b>BDP8 Affordable Housing</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
infrastructure and skills base whilst ensuring all share the benefits, urban and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not promote the development of new technologies.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy has no impact on raising the skills levels and qualifications of workforce.

BDP9 Rural Exception Sites		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The provision of affordable housing to meet local needs is the objective of this policy.
SO2 To improve the health and well-being of the population and reduce inequalities in health	?	The provision of affordable housing does not directly affect health although it could be argued that if people can afford a decent place to live then this could improve their well-being. The level of certainty would be low.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The provision of affordable homes can reduce social exclusion through reducing barriers to housing for poorer sectors of society. It can also help to maintain the vitality and viability of services and facilities in rural settlements.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy has no direct impact upon this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	0	This policy has no direct impact upon this objective.
SO6 To provide	0	This policy does not provide opportunities for community

BDP9 Rural Exception Sites		
SA Objectives	SA Effects	Commentary
opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		participation.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	This policy has no direct impact on biodiversity and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	The policy suggests that in exceptional circumstances, affordable housing may be allowed in or at the edge of a rural settlement in the Green Belt where there is a proven local need. This would adversely affect the protection of the Green Belt.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	Te policy suggests that in exceptional circumstances, affordable housing may be allowed in or at the edge of settlement in the Green Belt where there is a proven local need. This could lead to the development of greenfield land of high landscape character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well	0	The provision of affordable housing itself as part of a wider mixed-use development is unlikely to affect this objective.

BDP9 Rural Exception Sites		
SA Objectives	SA Effects	Commentary
designed, high quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy does not affect the waste management.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not impact on flood risk.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Affordable housing schemes need to achieve at least Level 3 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units.
EV8 Protect and enhance the quality of water, soil and air	0	This policy does not impact on water, soil and air quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	Affordable housing schemes need to achieve at least Level 3 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. This policy can therefore directly reduce causes of and adapt to the impacts of climate change.
Economic Objectives		
EC1 Develop a knowledge driven	0	This policy has no impact on the development of a knowledge driven economy.



BDP9 Rural Exception Sites		
SA Objectives	SA Effects	Commentary
economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not promote the development of new technologies.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy has no impact on raising the skills levels and qualifications of workforce.

<b>BDP10: Homes for the Elderly</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	Provision of housing that meets the local needs of the elderly is the objective of this policy.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The provision of homes for the elderly can directly affect the health of the ageing population as there are accommodation choices that are more appropriate to older people. The provision of Lifetime Homes would also allow older people to live in their homes longer, which can have positive impacts on health and well-being.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	Provision of homes for the elderly can reduce social exclusion through reducing barriers to housing for the older sectors of society.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The provision of homes for the elderly in retirement communities can reduce the fear of crime among older people.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The identification of sites and/or granting of planning consents in sustainable locations can reduce the need for elderly people to travel to key services.
SO6 To provide opportunities for	+	The provision of close care and continuing care retirement communities can encourage the elderly

BDP10: Homes for the Elderly		
SA Objectives	SA Effects	Commentary
communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		to participate and contribute to local decision making.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	This policy has no direct impact on biodiversity and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	The policy allows for development to occur outside of defined settlements in exceptional circumstances, which could lead to a loss of greenfield or Green Belt land.
EV3 Safeguard and strengthen landscape and townscape character and quality	?	The policy allows for development to occur outside of defined settlements in exceptional circumstances. These could potentially impact on landscape and townscape character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	The provision of homes for the elderly itself or as part of a wider mixed-use development is unlikely to affect this objective.
EV5 To manage waste in accordance with the	0	This policy does not affect the waste management hierarchy.

<b>BDP10: Homes for the Elderly</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal		
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not directly affect this objective
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	Although Lifetime Homes standards form part of the Code for Sustainable Homes, this policy itself does not require these standards and therefore is unlikely to affect this objective.
EV8 Protect and enhance the quality of water, soil and air	0	This policy does not impact on water, soil and air quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	The identification of sites and/or granting of planning consents in sustainable locations can reduce the need for elderly people to travel to key services, thus having a positive effect on climate change.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	This policy has no impact on the development of a knowledge driven economy.
EC2 promote and support the development of new technologies of high	0	This policy does not promote the development of new technologies.

<b>BDP10: Homes for the Elderly</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
value and low impact especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy has no impact on raising the skills levels and qualifications of workforce.

<b>BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	This policy has a positive contribution towards this objective.
SO2 To improve the health and well-being of the	+	Providing a permanent site for travellers close to health care facilities could improve their health and well-being.

<b>BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
population and reduce inequalities in health		
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	This policy makes a positive contribution towards reducing inequality in the provision of facilities.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	By making provision for gypsies, travellers and showpeople this may reduce the incidence of unlawful pitching.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	By making permanent pitches available this policy has the potential to reduce the need to travel.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	This policy does not provide opportunities for community participation.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and	0	The provision of accommodation for gypsies, travellers and showpeople is unlikely to impact on this objective.

<b>BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
geodiversity		
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	If further sites are required they are likely to be greenfield sites within the Green Belt due to the lack of available alternatives.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	If further sites are required they are likely to be greenfield sites within the Green Belt due to the lack of available alternatives. This could cause harm to landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	No likely impact on this objective.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	The provision of accommodation for gypsies, travellers and showpeople is unlikely to impact on this objective.
EV6 Ensure inappropriate	0	The provision of accommodation for gypsies, travellers and showpeople is unlikely to impact on this objective.

<b>BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas		
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The provision of accommodation for gypsies, travellers and showpeople is unlikely to impact on this objective.
EV8 Protect and enhance the quality of water, soil and air	0	This policy is unlikely to impact on this objective
EV9 Reduce causes of and adapt to the impacts of climate change	0	This policy is unlikely to impact on this objective
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	This policy is unlikely to impact on this objective
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy is unlikely to impact on this objective
EC3 To raise the	0	This policy is unlikely to impact on this objective



<b>BDP11 Accommodation for Gypsies, Travellers and Travelling Showpeople</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
skills levels and qualifications of workforce and quality of educational opportunities for all		

<b>BDP12: Sustainable Communities</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local	0	The objective relating to affordable housing is not specifically relevant to this policy as it relates to the wider aims of developing sustainable communities.

<b>BDP12: Sustainable Communities</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
environment		
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy has the potential to contribute towards this health and well-being objective in that it promotes the retention of essential local facilities and relates to BDP6 ensuring contributions from developers towards infrastructure provision. BDP6 is likely to secure developer contributions in new developments towards health facilities.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	This policy positively contributes towards this objective as it advocates adequate infrastructure should exist to support new development at the time of construction and promotes the retention of essential local facilities.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy has no direct impact upon this objective although it advocates adequate infrastructure should exist to support new development. Improvements in provision of and access to facilities should promote social well-being which in turn may reduce fear of crime.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	This policy actively seeks an improved balance between housing, employment and community facilities in settlements which could reduce the need for people to travel by car.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride	0	Whilst this policy does not directly contribute towards this objective, resisting the loss of essential local facilities may assist in promoting local community cohesion.

<b>BDP12: Sustainable Communities</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
and social responsibility in the local community		
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	0	This policy does not directly affect this objective.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	?	This policy has the potential to encourage the reuse of vacant buildings for example for essential local facilities but it does not specifically refer to protecting Green Belt, agricultural land etc.
EV3 Safeguard and strengthen landscape and townscape character and quality	?	This policy has the potential to encourage the reuse of vacant buildings for example for essential local facilities but it does not specifically refer to protecting landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	?	This policy has the potential to conserve the historic environment by encouraging the reuse of buildings for local facilities which may be of historic interest, however, it does not explicitly refer to the objective.
EV5 To manage waste in accordance with the waste	0	This policy does not directly affect this objective

<b>BDP12: Sustainable Communities</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal		
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not directly address this objective although all new development is expected to adopt sustainable development principles.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	This policy does not directly affect this objective
EV8 Protect and enhance the quality of water, soil and air	+	A reduction in the need to travel (by supporting local retail facilities) has the potential to improve air quality
EV9 Reduce causes of and adapt to the impacts of climate change	+	This policy actively seeks an improved balance between housing, employment and community facilities in settlements. By achieving this balance more people may be encouraged to use public transport, walking and cycling, therefore there is the potential to reduce carbon emissions.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	This policy does not directly affect this objective

<b>BDP12: Sustainable Communities</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not directly affect this objective
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy does not directly affect this objective

<b>BDP13 New Employment Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
Social Objectives		

<b>BDP13 New Employment Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	This policy does not directly affect this objective
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	This policy does not directly affect this objective
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The promotion of a range of employment sites to meet the needs of the local economy has the potential to increase choice, reduce inequality and have a positive impact on provision and maintenance of facilities in local communities.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy does not directly affect this objective
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Focussing employment growth on Bromsgrove Town where public transport links are better than surrounding areas and locating growth in local centres in order to reduce commuting can have positive benefits in terms of improving accessibility and reducing dependence on the private car. Allowing limited employment development in rural areas may mean that local jobs are provided for local people. There will be significant employment generated at the Longbridge site. This site is well connected with Birmingham and Bromsgrove in terms of public transport.
SO6 To provide opportunities for	0	This policy does not directly address community involvement

BDP13 New Employment Development		
SA Objectives	SA Effects	Commentary
communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	?	The impact on biodiversity/geodiversity is uncertain as impacts will be localised and very much dependent upon specific sites developed. However, it is likely to be better for growth to be centred in existing urban areas rather than in greenfield locations.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	Whilst the majority of employment development will be on brownfield sites within the existing urban area some will occur on greenfield land. The policy permits employment development on strategic sites, other development sites and some growth in rural areas. The loss of greenfield land conflicts with this environmental objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	Whilst the majority of employment development will be on brownfield sites within the existing urban area some will occur on greenfield land. Some will occur on strategic sites, other development sites and the policy also permits some growth in rural areas. The loss of greenfield land conflicts with this environmental objective.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high	?	Focussing growth predominantly on Bromsgrove Town has an uncertain impact on the historic environment as much of the Town Centre is designated as a Conservation Area. Thus the impact of this policy will be localised. However the emphasis on good design which pervades this strategy should have a positive impact on this objective.

<b>BDP13 New Employment Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy does not directly affect this objective
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not directly address this objective although all new development is expected to adopt sustainable development principles. However any new development has the potential to increase surface water runoff and it is likely that this will be addressed on a case by case basis.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The location of employment growth in areas closer to housing and more accessible by public transport means that there is likely to be a positive benefit to reducing road traffic and hence energy use and greenhouse gas emissions. Furthermore the promotion of new technology may potentially include industries which address climate change.
EV8 Protect and enhance the quality of water, soil and air	?	This policy does not specifically affect this objective. However development and employment growth has the potential to adversely affect water quality and water resource use.
EV9 Reduce causes of and adapt to the impacts of climate change	+	The location of employment growth in areas closer to housing and more accessible by public transport means that there is likely to be a positive benefit of reducing road traffic and hence energy use and greenhouse gas emissions. Furthermore the promotion of new technology may potentially include industries which address climate change.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven	+	The development of the High Technology Corridor should create skilled jobs that widen the employment base of the



<b>BDP13 New Employment Development</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural		district. The policy also promotes the use of appropriate skills development and training as part of the promotion of employment sites.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	++	This policy specifically supports the development of new technology opportunities as part of the Central Technology Belt this includes Longbridge and Bromsgrove Technology Park.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	The policy promotes appropriate skills development and training as part of the promotion of employment sites.

<b>BDP14: Designated Employment</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	This policy does not directly affect this objective
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	This policy does not directly affect this objective
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The promotion of a range of employment sites to meet the needs of the local economy has the potential to increase choice, reduce inequality and have a positive impact on provision and maintenance of facilities in local communities
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy does not directly affect this objective
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Focussing employment growth in existing employment areas where public transport links are better than surrounding areas and locating growth in local centres in order to reduce commuting can have positive benefits in terms of improving accessibility and reduction of dependence on the private car. Allowing only very limited employment development in rural areas may mean that local jobs are provided for local people.

<b>BDP14: Designated Employment</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	This policy does not directly address community involvement
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	?	The impact on biodiversity/geodiversity is uncertain as impacts will be localised and very much dependent upon specific sites developed. However, it is likely to be better for growth to be centred in existing employment areas than in greenfield locations
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	Whilst the majority of employment development will be on brownfield sites within the existing employment areas some will occur on greenfield land. The loss of greenfield land conflicts with this environmental objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	Whilst the majority of employment development will be on brownfield sites within existing employment sites some will occur on greenfield land. The loss of Greenfield land conflicts with this environmental objective.
EV4 Conserve, protect and enhance	0	This policy does not directly address historic built

<b>BDP14: Designated Employment</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.		environment heritage.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy does not directly affect this objective
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not directly address this objective although all new development is expected to adopt sustainable development principles. However any new development has the potential to increase surface water run-off and it is likely that this will be addressed on a case by case basis.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The location of employment growth in existing employment areas closer to housing and more accessible by public transport means that there is likely to be a positive benefit to reducing road traffic and hence energy use and greenhouse gas emissions. Furthermore the promotion of new technology may potentially include industries which address climate change.
EV8 Protect and enhance the quality of water, soil and air	?	This policy does not specifically affect this objective. However development and employment growth has the potential to adversely affect water quality and water resource use.

<b>BDP14: Designated Employment</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
EV9 Reduce causes of and adapt to the impacts of climate change	+	The location of employment growth in areas closer to housing and more accessible by public transport means that there is likely to be a positive benefit to reducing road traffic and hence energy use and greenhouse gas emissions. Furthermore the promotion of new technology may potentially include industries which address climate change.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	The development of existing employment sites should create skilled jobs that widen the employment base of the district.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	++	This policy specifically supports the development of existing employment areas which includes new technology opportunities at Bromsgrove Technology Park.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	The policy promotes appropriate skills development and training as part of the promotion of employment sites. The majority of employment sites are in existing employment areas therefore the positive impact will be greater in these locations.

BDP15: Rural Renaissance		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy allows affordable housing on rural exception sites in line with BDP9.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy promotes sport and recreation in countryside locations which can benefit health and well-being. Encouraging more development in rural locations would mean shorter distances for rural communities to travel, thus encourage more sustainable modes of transport such as walking and cycling and positively impact on the health and well-being of the population.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The policy supports the development of rural businesses which can contribute to a reduction in social exclusion in these areas. However, social inclusion is made up of many other aspects. Encouraging rural development can also have a positive effect on rural centres as they become more viable to the increased populations.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The policy supports the development of rural businesses which can contribute to a reduction in poverty. The increase in local businesses will lead to more human activities and hence improve natural surveillance and reduce opportunist crimes.
SO5 Increase sustainable travel choices and move towards more sustainable travel	++	The policy allows for an improvement of local facilities in the rural areas, as well as encouraging live/work units, this would mean shorter journeys to facilities. This will encourage more sustainable modes of transport such as walking and cycling and positively impact on the health and well-being of the

<b>BDP15: Rural Renaissance</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
patterns		population. The policy also advocates improvements of public transport links to service centres and employment areas.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The policy is unlikely to significantly affect this objective
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	?	The creation of new businesses and housing may adversely affect biodiversity in rural areas if it is not developed appropriately. But the policy guards against impacts upon the environment of the locality, so no adverse impacts are likely or significant. Green Belt development would also need to be fully justified by very special circumstances.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	The conversion of suitable buildings and re-use of historic farmsteads can maximise PDL and allow vacant units to be utilised. The policy could lead to an increase in applications in Green Belt locations however to gain approval schemes would need to be relatively small scale to be in keeping with the rural surroundings. Where significant harm would be caused an application is likely to be refused.
EV3 Safeguard and strengthen landscape and townscape character	?	The policy could lead to an increase in applications in Green Belt locations however to gain approval schemes would need to be relatively small scale to be in keeping with the rural surroundings. Where

BDP15: Rural Renaissance		
SA Objectives	SA Effects	Commentary
and quality		significant harm would be caused an application is likely to be refused.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	+	The conversion of suitable buildings and re-use of historic farmsteads can promote them as assets in the landscape and help to conserve buildings of architectural and historical value.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy does not directly address the issue of waste management.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not directly address the issue of flood risk management.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The policy allows for small scale renewable energy projects and businesses to serve the industry within rural locations.
EV8 Protect and enhance the quality of water, soil and air	0	This policy does not directly address this objective.



BDP15: Rural Renaissance		
SA Objectives	SA Effects	Commentary
EV9 Reduce causes of and adapt to the impacts of climate change	++	<p>The policy allows for an improvement of local facilities in the rural areas, as well as encouraging live/work units, this would mean shorter journeys to facilities. This will encourage more sustainable modes of transport such as walking and cycling and positively impact on the health and well-being of the population. The policy also advocates improvements of public transport links to service centres and employment areas, thus reducing the impact on climate change.</p> <p>The policy allows for small scale renewable energy projects which would have a positive effect on climate change.</p>
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	Development that contributes to rural enterprises, the provision of rural diversification schemes, and sport, recreation and tourism initiatives will all widen the employment opportunities in the rural areas of the District. The provision of agricultural dwellings and live-work units allows those with the skills for certain practices to stay in close proximity to their place of work.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	Development that contributes to rural enterprises and those that create rural diversification schemes could include new technologies. The provision of small scale renewable energy projects would also promote environmental technology initiatives.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Increased employment opportunities in rural areas can increase the provision of jobs, which in turn can raise the skill levels of those in rural communities.

<b>BDP16 Sustainable Transport</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	Whilst policy does not directly impact on provision of affordable housing by reducing the amount of travel /carbon emissions, it may contribute toward maintaining a clean safe and pleasant environment.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	By encouraging walking and cycling this will contribute positively towards the health and well being of residents.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The encouragement of a modal shift towards public transport may positively impact on the viability of services and increased penetration.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	No direct impact of policy in this respect.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	++	Policy directly advocates the reduction of need to travel and more sustainable travel patterns.
SO6 To provide opportunities for communities to	0	No direct impact of policy in this respect.

BDP16 Sustainable Transport		
SA Objectives	SA Effects	Commentary
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	+	Policy advocates the importance of integration of green infrastructure which will have positive impact in terms of biodiversity. No direct impact on geodiversity identified. Relief in congestion will improve air quality and hence support life.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	Conservation of resources is central to policy. Reduction in need to travel may mean the construction of less road infrastructure and hence land take which may have been greenfield and hence protection of countryside. A reduction in the need to travel is a corollary of sustainable communities which will have ideally been based on principles of reusing previously developed land.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	Conservation of resources is central to policy. Reduction in need to travel may mean the construction of less road infrastructure and hence land take which may have been Greenfield and hence protection of countryside and hence landscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment	0	No direct impact identified of policy in this respect.

BDP16 Sustainable Transport		
SA Objectives	SA Effects	Commentary
heritage and seek well designed, high quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	No direct impact identified of policy in this respect.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact identified of policy in this respect.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Policy advocates modal shift to greater use of public transport as opposed to private motor vehicle and also encourages the greater use of electric and plug-in hybrid vehicles which will contribute to conserving non renewable energy i.e. fossil fuels.
EV8 Protect and enhance the quality of water, soil and air	+	Reduction in carbon emissions is likely to arise from a reduction in travel by private car leading to improvements in air quality and also encouraging the greater use of electric and plug-in hybrid vehicles.
EV9 Reduce causes of and adapt to the impacts of climate change	+	A reduction in carbon emissions is likely to arise from encouraging more sustainable technologies and a reduction in travel by private car which directly impacts on the causes of climate change.
Economic Objectives		

<b>BDP16 Sustainable Transport</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	No direct impact identified of policy in this respect.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	The policy may indirectly have an impact as new technologies, including electric and hybrid vehicles, are developed to complement the cultural change of travelling less, homeworking more and maybe making travel by car more energy efficient using renewable energy sources.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	No direct impact identified of policy in this respect.

<b>BDP17 Town Centre Regeneration</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure	+	Policy supports provision of a mix of housing, including affordable homes, in the town centre which is a sustainable location and therefore accessible.

BDP17 Town Centre Regeneration		
SA Objectives	SA Effects	Commentary
and for local needs in clean safe and pleasant local environment		
SO2 To improve the health and well-being of the population and reduce inequalities in health	++	<p>The policy supports the regeneration of the town centre which will encourage an improved provision of facilities provide a better environment leading to a better quality of life and the proposal for a leisure led scheme on School Drive will directly provide health benefits.</p> <p>By encouraging walking and cycling this will contribute positively towards the health and well being of residents.</p>
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	++	<p>This policy scores highly as it directly supports the regeneration of Town Centre which will lead to an increase in the vitality and the viability of the Town Centre for all.</p> <p>This policy will protect and enhance all existing open spaces, provide a new community focused leisure and cultural development. This will improve the quality of and equitable access to local services and facilities to residents and employees in the District.</p>
SO4 Reduce crime, fear of crime and anti-social behaviour	++	<p>The policy supports the regeneration of the Town Centre which is likely to have a positive impact on reducing levels of crime i.e. by increasing activity/natural surveillance which reduces fear of crime.</p> <p>In addition measures to ensure an attractive and safe Town Centre is created will be encouraged by implementing a new public realm scheme.</p> <p>The policy promotes active frontages and avoiding the use of external security measures which are likely to reduce crime and the fear of crime.</p>
SO5 Increase sustainable travel choices and move towards more	++	<p>The policy may mean that more local people will visit the Town Centre rather than making unsustainable trips out of the District. However it is recognised that due to the dispersed nature of the district long</p>

BDP17 Town Centre Regeneration		
SA Objectives	SA Effects	Commentary
sustainable travel patterns		<p>journey distances/times may be inevitable and there may be closer centres outside of the District.</p> <p>The policy directly advocates the reduction of need to travel and more sustainable travel patterns. The policy actively encourages greater access to the town centre by public transport, cycling and walking.</p> <p>By seeking significant improvements to public transport particularly to bus services to connect new and existing residential areas to the Railway Station, with the Town Centre acting as the focal transport hub more sustainable travel opportunities will be available for people travelling to the Town Centre.</p>
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	++	The regeneration of the Town Centre has been identified in numerous surveys as being of great concern to residents. Its regeneration is therefore likely to engender a sense of pride, social responsibility and ownership.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	+	<p>Opportunities to enhance biodiversity are recognised as part and parcel of Town Centre regeneration and conversely focussing on the town centre will a not impact on rural biodiversity/geodiversity.</p> <p>Naturalisation of parts of the Spadesbourne Brook and improved open spaces like the Recreation Ground and Crown Close will contribute towards enhancing biodiversity in the Town Centre.</p>
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green	++	Town Centre regeneration by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre which includes its green spaces/public realm. The policy encourages the development of brownfield sites.

BDP17 Town Centre Regeneration		
SA Objectives	SA Effects	Commentary
Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.		
EV3 Safeguard and strengthen landscape and townscape character and quality	++	Town Centre regeneration by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre thereby preserving wider landscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	++	<p>A large proportion of the Town Centre is a conservation area which is seen as a positive asset to be enhanced as part of the regeneration process. Its historic heritage is what makes Bromsgrove Town Centre unique and therefore high quality design of new development will be sought to enhance its setting. Focussing development on urban areas has the effect of protecting the historic landscape.</p> <p>The policy seeks to ensure that development respects the historic character of the Town Centre including a number of measures e.g. respecting historic street patterns, building line, preserving and exploiting important views.</p> <p>The policy ensures materials are used that have a positive effect on the character and appearance of the Conservation Area. Street furniture and landscaping will ensure the linear open nature of the High Street. The use of lighting will enhance the high quality historic and modern architecture on the High Street.</p>
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other	?	Retail outlets can produce significant amounts of waste. If more people visit a regenerated town centre more litter is likely to be generated and management measures will need to be put into place accordingly.



BDP17 Town Centre Regeneration		
SA Objectives	SA Effects	Commentary
recovery, 5) disposal		
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact identified of policy in this respect.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Opportunities to use renewable energy in Town Centre regeneration will be optimised wherever feasible. Regenerating the Town Centre may result in fewer car journeys and hence a reduction in carbon emissions.
EV8 Protect and enhance the quality of water, soil and air	+	Improvements to traffic circulation in the Town Centre may relieve congestion and hence air quality. Town Centre regeneration may result in fewer car journeys as the Town Centre is well served by public transport. However it is not certain that people will always use public transport.
EV9 Reduce causes of and adapt to the impacts of climate change	+	Focussing development in Bromsgrove Town which is better connected by public transport and the proximity of people to jobs and services encourages walking and cycling instead of private car use, may result in a decrease in greenhouse gas emissions.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	++	The policy supports the regeneration of Town Centre which will encourage improved provision of facilities which includes education.
EC2 promote and support the development of new	+	The policy supports the regeneration of Town Centre which will encourage employment opportunities a proportion of which is likely to be in the new technology sector. The major employment is likely to

BDP17 Town Centre Regeneration		
SA Objectives	SA Effects	Commentary
technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives		be in retail and office sectors.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	The policy supports the regeneration of the Town Centre which will encourage improved provision of facilities which includes education.

<b>BDP18: District and Local Centres</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy advocates that residential use would be appropriate at upper floor levels. This could consist of some elements of affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy has the potential to contribute towards this health and well-being objective in that it allows District and Local centres to be sustainable locations by providing a number of services and also it promotes the retention of essential local facilities (Class A Use).
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	This policy positively contributes towards this objective as it advocates maintaining the retail infrastructure of District and Local centres and promotes the retention of essential local facilities (Class A Use).
SO4 Reduce crime, fear of crime and anti-social behaviour	+	By retaining the prominence of Class A Uses in District and Local centres, particularly at ground level frontages, will increase activity and thus contribute to the natural surveillance. This in turn would create less opportunity for crime and anti-social behaviour.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	By retaining the prominence of Class A Uses on ground floor level and other uses on upper floor level would allow more sustainable District and Local centres. People would be less likely to travel further afield for certain facilities and services, which allows more sustainable travel choice.
SO6 To provide opportunities for	+	Having an active District or Local centre that is utilised by local communities can encourage pride

<b>BDP18: District and Local Centres</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		within the local area and promote a social responsibility among residents.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	0	This policy does not directly affect this objective.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	?	This policy has the potential to encourage the reuse of vacant buildings for example for essential local retail facilities but it does not specifically refer to protecting Green Belt, agricultural land etc.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	This policy has the potential to encourage the reuse of vacant buildings for example for essential local retail facilities but it does not specifically refer to protecting landscape character and quality. Retaining the prominence of A Class Uses would keep to the retail character of the local centres.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment	?	This policy has the potential to conserve the historic environment by encouraging the reuse of buildings for local facilities which may be of historic interest.

<b>BDP18: District and Local Centres</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
heritage and seek well designed, high quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy does not directly affect this objective
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	This policy does not directly affect this objective
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	This policy does not directly affect this objective
EV8 Protect and enhance the quality of water, soil and air	+	A reduction in the need to travel (by supporting local retail facilities) has the potential to improve air quality
EV9 Reduce causes of and adapt to the impacts of climate change	+	By retaining the prominence of Class A Uses on ground floor level and other uses on upper floor level would allow more sustainable District and Local centres. People would be less likely to travel further afield for certain facilities and services, which allows more sustainable travel choices and thus reducing cause of climate change.

**BDP18: District and Local Centres**

SA Objectives	SA Effects	Commentary
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	By retaining the prominence of Class A Uses on ground floor level and other uses on upper floor level would allow a balanced mix of employment opportunities within District and Local Centres.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not directly affect this objective
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy does not directly affect this objective

BDP 19 High Quality Design		
SA Objectives	SA Effects	Commentary
Social Objectives		
S1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy promotes high quality design through layout, form, detailing and contribution to the character of the area including measures to reduce opportunities for crime. It also supports socially inclusive development.
S2 To improve the health and well-being of the population and reduce inequalities in health	+	An improvement in the design of urban and rural living environments, such as requiring development to provide sufficient functional space and avoiding road-dominated layouts, can have a gradual positive effect upon quality of life and health and well-being.
S3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The policy promotes high quality design and requires developments to be accessible to all users, thus improving the quality and accessibility of services and facilities to all.
S4 Reduce crime, fear of crime and anti social behaviour	++	This policy aims to reduce crime and fear of crime through designing environments which reduce opportunities for crime, disorder and anti-social behaviour (e.g. requiring development to meet the Secured by Design standard) which in the longer term should impact on fear of crime.
S5 Increased sustainable travel choices and move towards more sustainable travel patterns	+	The policy states that new developments should be easy to move through and around. There is also a user hierarchy for the design of streets so that vehicles do not over dominate schemes.
S6 To provide	+	The policy supports development that helps facilitate interaction between future occupants. It also promotes

BDP 19 High Quality Design		
SA Objectives	SA Effects	Commentary
opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		development that builds on the aspirations of the local community. This will help build social responsibility in the local community.
Environmental Objectives		
E1 To conserve and enhance biodiversity and geodiversity	+	The policy promotes development that builds on local distinctiveness and character. It also requires residential developments to meet a certain level of the Code for Sustainable Homes and BREEAM by which developments could perform well by meeting the ecological criteria.
E2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	The policy requires development to make the best use of land. It also requires development to use appropriate tools such as Building for Life and follow relevant guidance and procedures. It also requires residential developments to meet a certain level of the Code for Sustainable Homes. Ensuring efficient use of resources is one of the important elements of the tools and guidance.
E3 Safeguard and strengthen landscape and townscape character and quality	+	The policy requires development to enhance the character and distinctiveness of the local area. It also requires development to use appropriate tools such as Building for Life and follow relevant guidance. Responding to the local character and townscape is one of the important elements of the tool.
E4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well	+	The policy promotes high quality design and encourages developments to enhance the character and distinctiveness of the local area including the historic environment.



BDP 19 High Quality Design		
SA Objectives	SA Effects	Commentary
designed, high quality built environment in new development proposals.		
E5 To manage waste in accordance with the waste hierarchy; reduce, re-use, recycle, compost, recovery and disposal	+	The policy requires development to use appropriate tools such as Building for Life and follow relevant guidance. Providing convenient, dedicated bin and recycling storage is emphasised in the Building for Life tool and considered in the Standards and Quality in Development. The policy also requires residential developments to meet a certain level of the Code for Sustainable Homes and BREEAM by which developments are required to meet a minimum level in the waste category.
E6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	+	The policy requires residential developments to meet a certain level of the Code for Sustainable Homes by which developments are required to meet a minimum standard in the water and surface water run-off categories.
E7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The policy requires developments to consider a range of design topics and use appropriate tools, follow relevant guidance and procedures to achieve high quality design.
E8 Protect and enhance the quality of water, soil and air quality	+	The policy requires development to adopt measures to reduce the potential impact of pollutions (air, noise, light, water) to occupants, wildlife and the environment. The policy also requires residential developments to meet a certain level of the Code for Sustainable Homes and BREEAM by which developments are required to meet a minimum level in the waste category.
E9 Reduce causes of and adapt to the impacts of climate change	+	This policy encourages permeable, safe and easy to navigate street layouts and support street layout design to follow the user hierarchy, which will encourage more sustainable movement. The policy requires developments to meet a certain level of the Code for Sustainable Homes and BREEAM by which developments are required to meet a minimum standard in the energy efficiency category.

BDP 19 High Quality Design		
SA Objectives	SA Effects	Commentary
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	This policy does not specifically affect this objective although high quality design could link to well researched products/ principles.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	This policy does not specifically affect this objective although by requiring developments to meet a certain level of the Code for Sustainable Homes and BREEAM is likely to increase the demand for lower environmental impact materials and support the development of new high value and low impact technologies. High quality built environments can assist the marketing of the District as a good place to work and do-business. This can encourage the creation of new businesses and investment in the District and hence improve economic growth in the long-term
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy does not directly affect this objective.

<b>BDP20 Managing the Historic Environment</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	No direct impact of this policy has been identified in this respect.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	No direct impact of this policy has been identified in this respect.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	0	No direct impact of this policy has been identified in this respect.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	No direct impact of this policy has been identified in this respect.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	0	No direct impact of this policy has been identified in this respect
SO6 To provide opportunities for	+	The historic environment contributes to a sense of pride and local identity and enriches people's

<b>BDP20 Managing the Historic Environment</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		understanding of the unique culture and evolving nature of their community. Many areas have a rich historic legacy which contributes to local distinctiveness and is an important local educational resource. Historic places can be a powerful focus for community action and act as a tangible representation of an areas social history..
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	+	The historic landscape is likely to be rich in biodiversity. Also the preservation of heritage assets and their settings can contribute to preserving local habitats. The policy seeks to encourage opportunities to develop Green Infrastructure networks that can enhance the amenity value of the historic environment.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	Proactive conservation of the historic environment includes encouraging reuse of vacant buildings and may contribute to preserving habitats, hence biodiversity. Also the historic landscape of the District will also have Green Belt protection and is likely to be in agricultural use.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	The preservation of the character, particularly the historic landscape character is an important element of this policy
EV4 Conserve, protect and enhance the architectural,	++	This is the central objective of this policy.

BDP20 Managing the Historic Environment		
SA Objectives	SA Effects	Commentary
cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	The reuse of historic buildings, conversion of buildings reusing existing materials and the use of salvaged materials in traditional style is implicit in this policy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact of this policy has been identified in this policy.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The policy seeks to reduce carbon emissions by securing sustainable development.
EV8 Protect and enhance the quality of water, soil and air	0	No direct impact on policy has been identified in this respect
EV9 Reduce causes of and adapt to the impacts of climate change	+	The policy seeks to mitigate the effects of climate change by seeking the reuse of historic buildings and where appropriate their modification to reduce carbon emissions and secure sustainable development.

BDP20 Managing the Historic Environment		
SA Objectives	SA Effects	Commentary
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	No direct impact of this policy has been identified in this respect
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	The conservation of the historic environment is likely to be consistent with low impact technology. The policy also seeks to sustain field systems woodlands and historic farmsteads.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	No direct impact although the District has a rich historic legacy which is an important local educational resource. Historic buildings and spaces are a key component of our shared cultural identity and are a visual representation of how we used to live and work. Heritage assets can therefore be a valuable educational resource for future generations to understand social history

BDP 21 Natural Environment		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	The policy is unlikely to have a direct impact on this objective, although restoring and creating a wildlife network, design-in wildlife, protecting the landscape character can arguably create a more pleasant local environment for a development.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	A high quality natural environment will provide a healthy living environment to people and may encourage more people to undertake outdoor activities which will have positive impacts on this objective.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	0	The policy is unlikely to have a direct impact on this objective.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The policy is unlikely to have a direct impact on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	0	The policy is unlikely to have a direct impact on this objective.
SO6 To provide opportunities for communities to participate and	0	The same opportunities for consultation and community involvement apply to each area. The policy itself has no direct effect on this objective.

BDP 21 Natural Environment		
SA Objectives	SA Effects	Commentary
contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	++	One of the main purposes of the policy is to conserve and enhance biodiversity and geodiversity in the District. The policy therefore has a positive impact on this objective.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	The policy seeks to protect, restore and enhance habitats of biodiversity and geodiversity (including brownfieldS). The policy also aims to manage all landscape types, which covers all the countryside in the District. The policy will therefore have positive impacts on this objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	++	One of the main purposes of the policy is to protect and enhance the distinctive landscape character in the District.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built	0	The policy is unlikely to have a direct impact on this objective.



BDP 21 Natural Environment		
SA Objectives	SA Effects	Commentary
environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	The policy is unlikely to have a direct impact on this objective, although the requirement to adopt good environmental site practices may lead to a better management of construction waste.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	The policy is unlikely to have a direct impact on this objective.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The policy is unlikely to have a direct impact on this objective.
EV8 Protect and enhance the quality of water, soil and air	+	Protection of the natural environment will generally have an overall positive impact on this objective. The requirement to adopt good environment site practices will also have positive impact on the objective.
EV9 Reduce causes of and adapt to the impacts of climate change	++	The policy requires developments to protect, restore and enhance core areas, corridors, stepping stones and buffer stones for wildlife. This will help wildlife to move across landscape and better adapt to the impacts of climate change. Also, the requirement to adopt good environment site practices will help reduce causes of climate change.
Economic Objectives		
EC1 Develop a knowledge driven economy, the	+	The policy requires biodiversity compensation and adoption of good environmental site practice. Both are likely to benefit this objective. Building in wildlife and

BDP 21 Natural Environment		
SA Objectives	SA Effects	Commentary
infrastructure and skills base whilst ensuring all share the benefits, urban and rural		improvement to biodiversity and geodiversity sites could also potentially raise resident's interests to improve their knowledge on the subject.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	The policy is unlikely to have a direct impact on this objective.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The policy is unlikely to have a direct impact on this objective.

BDP22 Climate Change		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	The Affordable Housing Viability Study shows that it is viable to require affordable housing to meet the Code for Sustainable Homes Level 6 now and market housing to meet the same level by 2016. It is therefore unlikely that this policy will have any impact on this objective.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy requires development to be in locations well-served by existing local facilities, infrastructure and public/sustainable transport. This encourages alternatives to car travel and hence improving air quality. Also, some sustainable means of transport such as walking and cycling are likely to have positive health benefits.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The policy requires development to be in locations well-served by existing local facilities, infrastructure and public/sustainable transport. The sustainable location of development will improve accessibility to services and facilities and have positive impact on the viability and vitality of centres.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The policy has no direct effect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	This policy encourages sustainable development and reduces the need to travel.
SO6 To provide opportunities for communities to	0	The same opportunities for consultation and community involvement apply to each area.

BDP22 Climate Change		
SA Objectives	SA Effects	Commentary
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	?	The effect on this objective is uncertain. By requiring development and infrastructure to avoid the increased vulnerability to the range of impacts of climate change and take advantage of the opportunities arising from the changing climate, reduced damage to habitat could result (e.g. reduced number of water pollution incidents due to less flooding incidents). However, renewable energy generation scheme such as wind turbine and energy crops may affect biodiversity if not considered and designed properly.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	The policy requires development to meet the Code for Sustainable Homes and BREEAM. Both encourage the prudent use of resources by requiring low environmental impact construction and design.
EV3 Safeguard and strengthen landscape and townscape character and quality	?	Renewable energy generation scheme such as wind turbine, solar farm, energy crops may affect the landscape character and quality if not designed properly.
EV4 Conserve,	?	Reducing car traffic and carbon emissions can be

BDP22 Climate Change		
SA Objectives	SA Effects	Commentary
protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.		beneficial to preserving historic sites and their settings. However, inappropriate renewable energy schemes may affect the historic environment and historic landscape character if not designed properly
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	++	Requiring the construction and design of development to follow the waste management hierarchy and comply with the Waste Core Strategy will strongly contribute to this objective.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	+	Ensuring developments and infrastructure are planned to avoid the increased vulnerability to the range of impacts of climate change will include avoiding inappropriate development in high flood risk area. The policy will therefore have positive impact on this objective.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The policy supports development to reduce energy use and move away from fossil fuel through following the energy hierarchy and promoting low carbon energy generation. The policy therefore has positive impact on this objective.
EV8 Protect and enhance the quality of water, soil and air	+	The policy encourages sustainable travel patterns with the aim of reducing carbon emissions which should also improve air quality. Requiring development to achieve Code for Sustainable Homes and BREEAM standard will also have positive effect on this objective.
EV9 Reduce causes	++	This policy directly supports development which aims to

BDP22 Climate Change		
SA Objectives	SA Effects	Commentary
of and adapt to the impacts of climate change		reduce carbon emissions and supports developments that follow the energy and waste management hierarchies and promotes renewable energy proposals etc. This policy also directs development away from high risks areas and take advantage of the opportunities arising from climate change.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	The policy has no clear significant effect on this objective although some employment may be created if new industries emerge specifically to address climate change. Also the environmental benefits brought about by the policy may improve the image of the District as a place to live and work.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	To avoid the increased vulnerability to the range of impacts and take advantage of the opportunities arising from climate change will require development of new technologies. This will have a positive impact on the promotion of new industries and technologies that address climate change.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The policy has no clear significant effect on this objective.

BDP23 Water Management		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	Part of the aims of the Code for Sustainable Homes are to reduce the use of potable water and to avoid, reduce and delay the discharge of rainfall run-off to watercourses and public sewers using SuDS. The Affordable Housing Viability Study shows that it's viable for affordable housing to meet Code level 6 now and market housing to meet the same standard by 2016. It is therefore unlikely that the policy will have negative impact on this objective.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	Flooding, poor water quality adversely impacts upon quality of life and can contribute to increased stress for people whose properties are at risk of flooding. There are also adverse health impacts associated with flooding and poor water quality and, therefore the policy is assessed as having a positive impact as it seeks to deter inappropriate development in high flood risk areas and deter development that would increase flood risk or associated pollution.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	0	This policy has no clear significant effect on this objective, although part of the Spadesbourne Brook falls within the Town Centre and de-culverting, naturalising the Brook will potentially improve the attractiveness of Town Centre and its vitality and viability.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The policy has no clear significant effect on this objective, although requiring a buffer zone between watercourse and development will allow regular maintenance and potentially reduce the number of anti-social behaviour.

<b>BDP23 Water Management</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	0	The policy has no clear significant effect on this objective.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The same opportunities for consultation and community involvement apply to each area.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	+	This policy requires development to reduce water use and protect and enhance water quality. The policy also require developments to set aside land for SuDS which generally is more biodiversity friendly than the traditional flood alleviation methods. This policy will therefore likely to have a positive impact on this objective.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	0	The policy has no clear significant effect on this objective.
EV3 Safeguard and strengthen landscape and townscape	0	The policy has no clear significant effect on this objective, although some SuDS technique may impact on the landscape character, e.g. attenuation



<b>BDP23 Water Management</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
character and quality		ponds.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	?	The effect of the policy on this objective is uncertain. By deterring development that would increase flood risk would protect some historic buildings from flooding, but unsympathetic design may affect the settings, characters of the historic environment.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	The policy has no clear significant effect on this objective.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	++	This policy would positively fulfil all elements of this objective.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	This policy contributes positively to resource efficiency, for example through requiring developments to follow the water conservation hierarchy, address flood risk and contributing towards meeting the Water Framework Directive, which includes sustainable use of water bodies.
EV8 Protect and enhance the quality of water, soil and air	+	The policy supports developments that contribute to delivering the Water Framework Directive, which includes protecting, improving and sustainable use of water bodies. This will directly benefit water quality.
EV9 Reduce causes of and adapt to the impacts of climate	++	The policy requires development to take into account of flood risks – a major impact of changing climate - and adopt measures that works with the

<b>BDP23 Water Management</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
change		natural processes. These will help development to adapt to the changing climate and reduce carbon emissions.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	This policy has no clear significant effect on this objective.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	This policy supports the promotion of new industries and technologies that help achieve better water management, such as improving water quality, reducing water usage and addressing flood risks.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy has no clear significant effect on this objective.

<b>BDP24 Green Infrastructure</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy requires development to adopt a holistic approach to deliver the multiple benefits and vital services of Green infrastructure. It is therefore unlikely that the policy will have an impact on the viability/ provision of affordable housing. However, it is very likely that the policy will contribute towards creating/maintaining a pleasant environment
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy requires multi-functional green space such as retaining and enhancing open space for recreation and amenity, providing habitats for wildlife, reducing flood risks, improving accessibility, etc. The resulting improved living environment is likely to improve the health and well-being of the population.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The policy assesses development with a holistic approach and requires development to improve connectivity. This is likely to improve the vitality, viability and accessibility to local services and facilities.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	This policy has no clear significant effect on this objective, although better connectivity may improve usage of facilities and hence natural surveillance.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	This policy advocates the creation of green corridors which, in appropriate cases, could be used for recreational purposes and travel, by modes such as walking and cycling. It will therefore contribute positively to this objective.

<b>BDP24 Green Infrastructure</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The same opportunities for consultation and community involvement apply to each area.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	+	The protection, enhancement and restoration of the Green Infrastructure assets will have a positive impact on biodiversity (for example green corridors) and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	The policy emphasises on the multiple benefits (e.g. providing habitats for wildlife and at the same time improving water quality and providing amenity space for people) and vital services of Green Infrastructure which directly contributes positively to this objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	Landscape character is considered as Green Infrastructure asset. As the policy aims to protect, enhance and restore the Green Infrastructure assets, this policy therefore contributes positively to this objective.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in	+	Historic built environment and heritage assets are considered as Green Infrastructure assets. As the policy aims to protect, enhance and restore the Green Infrastructure assets, this policy therefore contributes positively to this objective.

<b>BDP24 Green Infrastructure</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy has no clear significant effect on this objective.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	+	The policy emphasises on the multiple benefits and vital services of Green Infrastructure and sustainable management of the water environment is one of the vital services of Green Infrastructure, hence this policy will contribute positively to this objective.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	This policy requires development to use a holistic approach that acknowledges the multiple benefits and vital services of Green Infrastructure. This will ensure sustainable design for spaces that is sensitive to the locality.
EV8 Protect and enhance the quality of water, soil and air	+	This policy requires development to acknowledge the vital services of Green Infrastructure which includes the quality of water, soil and air. The policy therefore is likely to contribute positively towards this objective.
EV9 Reduce causes of and adapt to the impacts of climate change	+	This policy requires development to acknowledge the vital services of Green Infrastructure which includes mitigating the causes of (such as carbon sink) and adapt to the impacts of climate change (flood risk). This policy is therefore likely to contribute positively towards this objective.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits,	0	This policy has no clear significant effect on this objective.

BDP24 Green Infrastructure		
SA Objectives	SA Effects	Commentary
urban and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy has no clear significant effect on this objective.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	This policy requires development to acknowledge the multiple benefits of Green Infrastructure. By exposing to the multi-functional green space, people are likely to learn more about the 'extra' functions of the space.

BDP25: Health and Well-Being		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	The policy does not affect this objective
SO2 To improve the health and well-being of the population and reduce inequalities in health	++	<p>The policy requires the retention and enhancement of open space for sport, recreation and amenity and the resulting improved living environment would help to improve the health and well-being of the population. It also allows the provision of these facilities.</p> <p>It also aims to maintain greater access and enjoyment of the countryside, providing walking and cycling routes. The policy also looks to reduce concentrations of uses such as A5 that hinder health and well-being, especially in close proximity to schools and parks. Partnership work is also encouraged to improve opportunities for healthy and active lifestyles, as well as local food growing initiatives.</p>
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational	+	Controlling the number of A5 uses in centres can have a positive effect on the vitality of these centres. The maintenance and enhancement of open space and recreational facilities also contributes positively to this objective, as communities have greater access.

BDP25: Health and Well-Being		
SA Objectives	SA Effects	Commentary
attainment		
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Reducing the over-concentration of A5 units can have a positive effect on reducing the fear of crime and reduces anti-social behaviour.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The Policy aims to provide excellent access to sport, leisure and recreation facilities, as well as providing high-quality walking and cycling routes, which increases sustainable transport patterns.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	This policy has no direct impact on this objective
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	+	The retention and enhancement of open space has the potential for a positive impact on biodiversity ( for example green corridors) and geodiversity
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and	++	This policy contributes strongly to this objective as it looks to provide open space as part of developments, as well as retaining existing sport, open space and recreation areas. This in turn safeguards open space, which could also be of biodiversity value.



BDP25: Health and Well-Being		
SA Objectives	SA Effects	Commentary
biodiversity interest.		
EV3 Safeguard and strengthen landscape and townscape character and quality	++	This policy contributes strongly to this objective as it looks to provide open space as part of developments, as well as retaining existing sport, open space and recreation areas. This in turn safeguards open space, which could also be of landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	This policy has no direct impact on this objective.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	This policy has no direct impact on this objective.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	+	The policy has the potential to minimise flood risk through maintaining areas of undeveloped greenspace that will enable rainfall to permeate the soil and reduce run-off. It is also likely to reduce the actual number of properties at risk of flooding if new greenspace is created where previously there were impermeable surfaces.
EV7 Promote resource efficiency and energy generated from renewable energy	0	This policy does not directly affect this objective

<b>BDP25: Health and Well-Being</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
and low carbon sources		
EV8 Protect and enhance the quality of water, soil and air	0	Although this policy does not directly affect this objective it is unlikely to have an adverse impact compared to other potentially damaging land uses for example industrial development.
EV9 Reduce causes of and adapt to the impacts of climate change	0	This policy has no direct impact on this objective
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	This policy does not directly affect this objective
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not directly affect this objective
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	This policy does not directly affect this objective



## Appendix B: Comparison of Assessment of BDP Policies against SA Objectives

BDP SA	1	2	3	4	5A	5B	RC BD 1	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
<b>SOCIAL OBJECTIVES</b>																												
SO1	1	2	2	1	2	n/a	2	1	2	2	2	2	1	0	0	0	1	1	1	1	1	0	0	0	0	1	0	
SO2	1	1	0	1	1	n/a	1	1	1	0	0	1	1	1	0	0	1	1	2	1	1	0	1	1	1	1	2	
SO3	1	1	1	1	1	n/a	1	1	1	1	1	1	1	1	1	1	1	1	2	1	1	0	0	1	0	1	1	
SO4	0	0	0	0	1	n/a	1	1	1	0	0	1	1	0	0	0	1	0	2	1	2	0	0	0	0	0	1	
SO5	2	0	1	1	1	n/a	1	1	1	0	0	1	1	1	1	1	2	2	2	1	1	0	0	1	0	1	1	
SO6	0	0	0	0	0	n/a	0	0	0	0	0	1	0	0	0	0	0	0	2	1	1	1	0	0	0	0	0	
<b>sub total</b>	<b>5</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>6</b>	<b>n/a</b>	<b>6</b>	<b>5</b>	<b>6</b>	<b>3</b>	<b>3</b>	<b>7</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>6</b>	<b>5</b>	<b>11</b>	<b>6</b>	<b>7</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>4</b>	<b>5</b>	
<b>ENVIRONMENTAL OBJECTIVES</b>																												
EV1	1	0	0	1	0	n/a	0	1	0	0	0	0	0	0	0	0	0	1	1	0	1	1	2	0	1	1	1	
EV2	1	0	-2	1	-1	n/a	-2	0	0	0	-1	-1	-1	0	-1	-1	1	1	2	0	1	1	1	1	0	1	2	
EV3	1	-1	-1	1	-1	n/a	-1	1	0	0	-1	0	-1	0	-1	-1	0	1	2	1	1	1	2	0	0	1	2	
EV4	1	0	0	1	0	n/a	0	1	0	0	0	0	0	0	0	0	1	0	2	0	1	2	0	0	0	1	0	
EV5	1	1	0	0	1	n/a	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	2	0	0	0	
EV6	1	0	0	0	0	n/a	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	1	1	
EV7	1	1	0	0	1	n/a	0	0	0	1	1	0	0	0	1	1	1	1	1	1	0	1	1	0	1	1	1	0
EV8	1	0	0	1	0	n/a	0	1	0	0	0	0	0	1	0	0	0	1	1	1	1	0	1	1	1	1	0	
EV9	1	0	0	1	1	n/a	1	1	0	1	1	1	0	1	1	1	2	1	1	1	1	1	1	2	2	2	1	0
<b>sub total</b>	<b>9</b>	<b>1</b>	<b>-3</b>	<b>6</b>	<b>1</b>	<b>n/a</b>	<b>-2</b>	<b>6</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>-2</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>6</b>	<b>10</b>	<b>3</b>	<b>9</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>7</b>	<b>8</b>	<b>6</b>	
<b>ECONOMIC OBJECTIVES</b>																												
EC1	1	1	1	0	1	n/a	1	1	0	0	0	0	0	0	1	1	1	0	2	1	0	0	1	0	0	0	0	
EC2	1	1	1	0	1	n/a	1	0	0	0	0	0	0	0	2	2	1	1	1	0	1	1	0	1	1	0	0	
EC3	0	1	1	0	1	n/a	1	1	0	0	0	0	0	0	1	1	1	0	1	0	0	1	0	0	0	1	0	
<b>sub total</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>n/a</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>0</b>	
<b>grand total</b>	<b>16</b>	<b>8</b>	<b>4</b>	<b>10</b>	<b>10</b>	<b>n/a</b>	<b>7</b>	<b>13</b>	<b>6</b>	<b>5</b>	<b>3</b>	<b>7</b>	<b>3</b>	<b>5</b>	<b>6</b>	<b>6</b>	<b>14</b>	<b>12</b>	<b>25</b>	<b>10</b>	<b>17</b>	<b>11</b>	<b>10</b>	<b>12</b>	<b>9</b>	<b>13</b>	<b>11</b>	

## **Appendix C**

### **Sustainability Appraisal – BDP5B Other Development Sites**

A Sustainability Appraisal has been carried out for each site identified within Table 3 of Policy BDP5B. Although most of the sites have already received planning permission it was considered prudent to record the sustainability scores of each of the other development sites within Bromsgrove.

#### **1. Alvechurch**

Comprises two small development sites located on the northern edge of the existing residential area of Alvechurch. The first site, which has an area of approximately 1.06 hectares, is located on the corner of Birmingham Road/Old Rectory Lane and is predominantly agricultural/grassland. The second site has an area of around 0.60 hectares, is predominantly grazing land and although there is significant woodland, no development will be acceptable on the wooded section. The site is located to the rear of houses on Oak Tree Close and fronting Birmingham Road, with a branch of the Worcester and Birmingham canal located to the western boundary, as shown on map 2 (page 29).

#### **Key Site Strengths**

Both sites are in sustainable locations with good access to existing services, facilities and infrastructure within the settlement of Alvechurch. New housing in the settlement will help to maintain the vitality and viability of local services and facilities. Development on these sites would deliver some affordable housing which would help to meet local needs.

Both sites are located on the Birmingham Road close to public transport options. This will hopefully lead to the increased use of public transport and encourage healthier options such as walking and cycling. Development in accessible locations could lead to improvements in quality of life and also tackle social exclusion. Development of any site will need to address the issue of climate change through following the waste hierarchy and also the possibility of utilising low/zero carbon energy sources.

#### **Key Site Weaknesses**

There are very limited levels of brownfield land across the District and therefore both of the development sites proposed are greenfield. The sites are greenfield land and development could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality. However Green Belt would not be utilised. Land behind Oak Tree Close and fronting Birmingham Road is adjacent to the Birmingham and Worcester Canal which is designated as a SWS and could be harmed by development. The site is located adjacent to the motorway and therefore air quality and noise could be a concern for any future development. The site therefore performs poorly against objective EV8.

Noise and air quality could be an issue for the site adjacent to the motorway. It is considered that further work will be required on this matter.

Development on Land to the East of Birmingham Road and Old Rectory Lane would impact significantly upon landscape character as the land is of high landscape sensitivity. The site is also within 300m of the River Arrow which is designated as a SWS and coniferous woodland which priority habitat within the Worcestershire BAP. These environmental assets could be harmed by development.

### **Recommendations for Mitigation**

Noise and air quality studies should be undertaken before any planning application is submitted to see if any mitigation is required. Further investigative work should be undertaken on biodiversity matters. This should include gathering data from the Worcestershire Biological Records Centre. If development is proposed in this location buffer zones could be provided around the SWS to ensure that it is not harmed at Land behind Oak Tree Close and fronting Birmingham Road. If development is proposed an appropriate drainage strategy will be required to ensure that the SWS to ensure is not harmed at Land to the East of Birmingham Road and Old Rectory Lane.

## **2. Barnt Green 'White land'**

Also included in the list of other development sites is land at Barnt Green, identified as an 'unzoned area' in the BDLP. The site has a developable area of approximately 5 hectares (this excludes Cherry Hill Coppice, the Barnt Green Inn and the cricket pitch) and is identified on map 3 (page 30). At the Public Inquiry held into the Proposed Modifications of the Bromsgrove District Local Plan the Inspector identified that the site<sup>13</sup> at Barnt Green was a suitable location for some ADR provision. Following a High Court challenge whereby the views of the Inspector were upheld and after due consideration, BDC now concur with this view.

### **Key Site Strengths**

The site is within a sustainable location with good access to existing services, facilities and infrastructure within the settlement of Barnt Green. The site has good links to local retail, schools and health facilities. The good access to schools and the GP surgery could have benefits in terms of educational attainment and the general health and well-being of the population. This is enhanced by the close proximity to sports and recreation facilities and the adjacent cricket club.

New housing in the settlement will help to maintain the vitality and viability of local services and facilities. Development on this site would deliver some affordable housing which would help to meet local needs. The site is adjacent to the railway station with bus services also available nearby. This will hopefully lead to the increased use of public transport and encourage

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<sup>13</sup> *As shown on plan*

healthier options such as walking and cycling. Development in accessible locations could lead to improvements in quality of life and also tackle social exclusion. The development of any site will need to address the issue of climate change through following the waste hierarchy and also the possibility of utilising low/zero carbon energy sources.

### **Key Site Weaknesses**

There are very limited levels of brownfield land across the District and therefore the development site proposed is on greenfield land. The site is currently greenfield land and development could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality. However Green Belt would not be utilised.

The site performs poorly against EV4 due to the proximity of the Grade II listed Barnt Green Inn being adjacent as well as the neighbouring Conservation Area adjoining the site.

Although the site falls within flood zone 1 and therefore has the lowest risk of flooding, according to the Council's drainage engineer, Fiery Hill Road to the northwest of the site is subject to sewer flooding.

The site contains no statutory environmental designations but further work will be required to assess the wider biodiversity implications. The site is located adjacent to the conservation area and also contains a listed building. High quality design will be required to maintain the setting of the listed building and wider conservation area.

### **Recommendations for Mitigation**

Further investigative work should be undertaken on biodiversity matters. This should include gathering data from the Worcestershire Biological Records Centre. Design guidance could be developed to ensure development does not harm the setting of the listed building or detract from character of the adjacent conservation area.

### **3. Catshill**

This site is located to the north western edge of the residential area of Catshill, to the rear of houses fronting Stourbridge Road and bounded in part to the north by the M5. It totals some 6.04 hectares in area, is vacant and has a watercourse running through it, together with associated flood plain and is shown in map 4 (page 31).

### **Key Site Strengths**

The site is in a sustainable location with good access to existing services, facilities and infrastructure within the settlement of Catshill. New housing in the settlement will help to maintain the vitality and viability of local services and facilities. Development on this site would deliver some affordable housing which would help to meet local needs.

The site is located close to a bus stop which provides links to both Birmingham and Bromsgrove. This sustainable location will hopefully lead to the increased use of public transport and encourage healthier options such as walking and cycling. Development in accessible locations could lead to improvements in quality of life and also tackle social exclusion. The development of any site will need to address the issue of climate change through following the waste hierarchy and also the possibility of utilising low/zero carbon energy sources.

### **Key Site Weaknesses**

There are very limited levels of brownfield land across the District and therefore the development site proposed is on greenfield land. The site is currently greenfield land and development could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality. However Green Belt would not be utilised.

The site contains no statutory environmental designations but further work will be required to assess the wider biodiversity implications. There used to be a LWS within the site but due to a decrease in the quality of the site this designation was lost. Development of the site could be an opportunity to regain this local designation. Noise and air quality could be an issue for the site adjacent to the motorway. It is considered that further work will be required on this matter. The Battlefield Brook runs through the site and there is an area of flood risk associated with this. Mitigation will be required to address this matter. The Grade II listed Christ Church is located adjacent to the site and high quality design would be required to ensure development respected its setting.

### **Recommendations for Mitigation**

Noise and air quality studies should be undertaken before any planning application is submitted to see if any mitigation is required. Further investigative work should be undertaken on biodiversity matters. This should include gathering data from the Worcestershire Biological Records Centre and also development should be seen as an opportunity to regain the LWS status. A detailed flood risk assessment will need to be undertaken before the submission of a planning application to ensure that appropriate mitigation is put in place.

## **4. Frankley**

This site is located close to the boundary with Birmingham in the north western sector of the District. The site is approximately 6.66 hectares in area and is currently vacant. Restrictive covenants affect the site which limit both its use and developable area. See map 5 (page 32).

### **Key Site Strengths**

This site is affected by a restrictive covenant which limits its development potential in the short term but it could have long term development potential. It



is located on the boundary with Birmingham. This site is in a sustainable location with good access to existing services, facilities and infrastructure abutting the boundary of Birmingham. New housing in this location would help to maintain the vitality and viability of local services and facilities. Development on this site would deliver some affordable housing which would help to meet local needs. The development of any site will need to address the issue of climate change. As it is located in a sustainable location this could help to reduce the number of car journeys and hence carbon emissions. Any new development would also follow the waste, water and energy hierarchies and seek to incorporate zero or low carbon energy in any new development. The current use of the land is scrubland with the possibility of some tipping. Therefore its development could alleviate potential land contamination and reduce crime levels in the form of illegal tipping.

### **Key Site Weaknesses**

The site is covered by a restrictive covenant which limits its development potential in the short term. If this covenant could be lifted/ renegotiated the land could offer some development potential in the future. The site is currently greenfield land and development could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality. However, it has some mitigating factors in that it is enclosed on three sides by development thereby potentially limiting the wider impacts on landscape character.

The site does not contain any statutory environmental designations but further work will be required to assess the wider biodiversity implications.

### **Recommendations for Mitigation**

Further investigative work would need to be undertaken on biodiversity matters if this site were to be brought forward for development. This should include gathering data from the Worcestershire Biological Records Centre.

## **5. Hagley**

This large site, located to the south of Kidderminster Road (A456) and to the west of the A491, is almost 22 hectares in area, as indicated on map 6 (page 33). It is predominantly agricultural land with some residential development to the southern end of the site. Gallows Brook bisects the site. It is considered that this site could provide a sustainable mixed use development comprising community leisure, employment and residential development.

### **Key Site Strengths**

This site is in a sustainable location with good access to existing services, facilities and infrastructure. New housing in this location would help to maintain the vitality and viability of local services and facilities. The site area has the ability to deliver affordable housing and the opportunity to design out crime, this applies to all sites. Development on this site could also deliver some affordable housing helping to meet Bromsgrove's needs. The development of any site will need to address the issue of climate change. As it is located in a sustainable location and may incorporate on site employment

provision this could help to reduce the number of car journeys and hence carbon emissions. Any new development would also follow the waste, water and energy hierarchies and seek to incorporate zero or low carbon energy.

### **Key Site Weaknesses**

The site is currently greenfield land and development could be seen as being contrary to environmental sustainability objectives EV2 and EV3 that “seek to protect the countryside, green spaces, Green Belt and the best agricultural land and safeguard and strengthen landscape character and quality”. However, designated Green Belt would not be utilised.

The development of the site would impact upon landscape character as the land is of medium landscape sensitivity. In addition the site contains a traditional woodland which is priority habitat within the Worcestershire BAP. This could be adversely affected by the development.

Infrastructure capacity has been highlighted as a potential weakness in previous consultations. The impact of flooding in relation to Gallows Brook was unknown when the level 1 Strategic Flood Risk Assessment was carried out, as this watercourse had not been modelled. The site does not contain any statutory environmental designations but further work will be required to assess any wider biodiversity implications. The site is located close to an Air Quality Management Area and any new development would have to take this into account in terms of design to ensure development did not impact adversely on the AQMA. Any new development is likely to have an impact on traffic flows.

### **Recommendations for Mitigation**

The impact of any traffic flows generated by new development would require in depth examination to ensure new traffic movements would not impact adversely in this respect and incorporate adequate mitigation measures. Further investigative work would need to be undertaken on biodiversity matters if this site were to be brought forward for development. This should include gathering data from the Worcestershire Biological Records Centre.

If development is proposed in this location buffer zones could be provided around the traditional orchard to ensure that the BAP priority habitat is not harmed.

Further investigative work would also need to be undertaken on flooding and the level 2 Strategic Flood Risk Assessment, which is currently underway, includes for the modelling of Gallows Brook. This will assess the potential magnitude of flooding in this area and the likely impact of new development.

Undertake detailed Air Quality Assessment and consider the opportunities for mitigating any potential air quality impacts.

The capacity of local facilities including schools needs to be carefully considered. Discussions will be required with WCC to ensure adequate places are available in local schools and whether any changes are needed regarding

catchment area criteria. Similarly research will be required to assess the impact of development on other local facilities such as GP surgeries to ensure that it is possible to provide adequate social infrastructure to cater for the influx of new residents.

## **6. Ravensbank expansion site**

This site is located to the south/east of the existing Ravensbank employment site and is approximately 10 hectares in area, as indicated on map 7 (page 34). The original employment site caters for Redditch Borough's needs and it is envisaged that this expansion site could provide additional capacity for Redditch's future needs on a similar basis.

### **Key Site Strengths**

The site is within a sustainable location on the edge of Redditch, close to existing residential areas. Employment development in this location will improve access to jobs for local residents. The improved access to jobs locally may reduce the need for unsustainable long distance commuting. Bus services are available near to the site which should encourage more sustainable modes of travel. Some people will also have the opportunity to walk or cycle to work at this employment site which could reduce CO2 emissions. Development in accessible locations could lead to improvements in quality of life and also tackle social exclusion. Employment development in this location could deliver a number of economic benefits for the town of Redditch. There is potential for the site to incorporate high technology firms and boost the knowledge driven economy. New employers on the site may also provide opportunities for employees to obtain skills and qualifications which could boost educational attainment in Redditch.

### **Key Site Weaknesses**

There is insufficient land available within the boundary of Redditch and therefore the development site proposed is on greenfield land adjacent to Redditch. This could be seen as being contrary to environmental sustainability objective EV3 that seeks to safeguard and strengthen landscape character and quality. The site contains no statutory environmental designations but further work will be required to assess the wider biodiversity implications.

### **Recommendations for Mitigation**

Further investigative work should be undertaken on biodiversity matters. This should include gathering data from the Worcestershire Biological Records Centre.

## **7. Wagon Works/St Godswalds Road**

This development site is located south of existing residential development at Scaife Road, south/west of St Godswalds Road and in relative close proximity to Bromsgrove railway station, as shown on map 8 (page 35). This site comprises almost 8 hectares of land currently used for grazing purposes.

### **Key Site Strengths**

The site is in a sustainable location with good access to existing services, facilities and infrastructure within Aston Fields. New housing will help to

maintain the vitality and viability of local services and facilities in Aston Fields. Development on this site would deliver some affordable housing which would help to meet local needs. The site is located close to both bus and rail services which provide links to local destinations. This sustainable location will hopefully lead to the increased use of public transport and encourage healthier options such as walking and cycling. Development in accessible locations could lead to improvements in quality of life and also tackle social exclusion.

The development of any site will need to address the issue of climate change through following the waste hierarchy and also the possibility of utilising low/zero carbon energy sources.

### **Key Site Weaknesses**

There are very limited levels of brownfield land across the District and therefore the development sites proposed is on greenfield land. Development could be seen as being contrary to environmental sustainability objective EV3 that seeks to safeguard and strengthen landscape character and quality. It is also likely that a number of trees will be lost to accommodate the development.

### **Recommendations for Mitigation**

A comprehensive landscaping scheme should be agreed as part of any planning approval ensuring that replacement trees are located appropriately throughout the development.

## **8. Wythall**

Comprises two development sites located to the north (Bleakhouse Farm) and east (Selsdon Close) respectively of the existing residential area at Wythall, as shown on Map 9 (page 36). The first site is approximately 6.3 hectares in area and the second smaller site has an area of approximately 3.1 hectares.

### **Key Site Strengths**

These sites are in sustainable locations with good access to existing services, facilities and infrastructure including Wythall railway station. New housing in this location would help to maintain the vitality and viability of local services and facilities. Development on these sites would also deliver some affordable housing which could help to meet local needs.

The development of any site will need to address the issue of climate change. As they are located in sustainable locations close to the settlement of Wythall this could help to reduce the number of car journeys and hence carbon emissions. Any new development would also follow the waste, water and energy hierarchies and seek to incorporate zero or low carbon energy.

### **Key Site Weaknesses**

The sites perform poorly against a number of the environmental objectives due to the development being on greenfield land but this is applicable to all of the sites however, in this instance the sites are not within the designated

Green Belt. The development of the sites would impact upon landscape character as the land is of medium landscape sensitivity.

**Recommendations for Mitigation**

None.

Alvechurch		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy ensures that 40% affordable housing will be delivered on development sites to help meet local needs.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The development sites in Alvechurch are considered to be in sustainable locations and therefore there are likely to be positive benefits in terms of human health and well-being.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The development sites in Alvechurch are considered to be in sustainable location within walking distance of the local centre and therefore there are likely to be positive benefits in terms of human health and well-being.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Measures to design out crime can be incorporated into any large scale development
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The sites are located within good access to bus services. There is also a train station in Alvechurch.
SO6 To provide opportunities for communities to	0	The policy has no effect on this objective.

Alvechurch		
SA Objectives	SA Effects	Commentary
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	-	<p>An SWS is located adjacent to Land to the Rear of Oak Tree Close which would need to be protected. Further work would be required to determine if any notable or protected species are present on the site.</p> <p>Land to the East of Birmingham Road and Old Rectory Lane is within 300m of the River Arrow SWS and coniferous woodland is a priority habitat within the Worcestershire BAP. Further work would be required to determine if any notable or protected species are present on the site.</p>
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	--	Development on any of the areas will result in the loss of greenfield land.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	<p>Development on land to the Rear of Oak Tree Close would result in the loss of Greenfield land however in this instance the land is of low landscape sensitivity and therefore is resilient to change.</p> <p>Development on land to the East of Birmingham</p>

Alvechurch		
SA Objectives	SA Effects	Commentary
		Road and Old Rectory Lane would result in the loss of Greenfield land. In this instance the land is of high landscape sensitivity and therefore is not resilient to change.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	+	High quality design would be expected on any site. There are no listed buildings on or adjacent to the site and therefore no negative impact upon the historic environment.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Development on every site would be expected to follow the waste hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No flood risk is associated with either of the two Alvechurch sites.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality	-	Land to the Rear of Oak Tree Close is adjacent to the motorway and therefore air quality could be a



Alvechurch		
SA Objectives	SA Effects	Commentary
of water, soil and air		<p>concern for occupiers of any proposed dwellings.</p> <p>All development has the potential to impact upon water quality and increase demand for water usage but measures will be in place.</p>
EV9 Reduce causes of and adapt to the impacts of climate change	+	The sites are located close to public transport options and this could reduce car based travel and therefore reduce CO2 emissions.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	Neither of the sites in Alvechurch are expected to contain any employment development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	Neither of the sites in Alvechurch are expected to contain any employment development.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Both sites are located close to the school in Alvechurch. This gives people greater opportunities to obtain skills and qualifications.

<b>Barnt Green</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy ensures that 40% affordable housing will be delivered on development sites to help meet local needs.
SO2 To improve the health and well-being of the population and reduce inequalities in health	++	The development site in Barnt Green is considered to be in a sustainable location, within walking distance of the local centre and therefore there are likely to be positive benefits in terms of human health and well-being. Sports facilities are also less than 400m from the site and access to the adjacent Lickey Hills Country Park would encourage recreational walking. A cricket ground is also located adjacent to the site.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	++	The site in Barnt Green is located close to the local centre ensuring good access to local facilities. The site is less than 400m of retail facilities on Hewell Road and St. Andrews First School which are therefore within walking distance
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Measures to design out crime can be incorporated into any large scale development
SO5 Increase sustainable travel choices and move towards more sustainable travel	++	The site is adjacent to Barnt Green train station and a bus stop is next to the site meaning that there are excellent opportunities to travel by sustainable modes of transport. The site is also within walking distance of local retail facilities which should reduce

<b>Barnt Green</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
patterns		the need to use the private car to cater for everyday needs.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The development of this site would have no effect on this objective.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	0	There are no statutory designations on the site, but the Lickey Hills Country Park is located on the opposite side of the road to the site which is a SWS. Further work would be required to determine if any notable or protected species are present on the site. The site is subject to a TPO and various trees would therefore be kept as part of any development.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	The site is on greenfield land and therefore it is inevitable that this will result in the loss of greenfield land. The lack of brownfield land means that greenfield sites have to be used to meet housing targets. Although the development of this site will ensure that Green Belt land is not developed.
EV3 Safeguard and strengthen landscape and townscape character	-	The site is on Greenfield land. The loss of greenfield land is required to meet housing needs and may impact upon landscape character and quality.

<b>Barnt Green</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
and quality		
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	-	High quality design would be expected on any site. The Grade II listed Barnt Green Inn is adjacent to the site. The Barnt Green Conservation Area also adjoins the site. These factors would require development to be designed sensitively to take into account the setting of both.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Waste minimisation measures can be incorporated onto any site.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	-	The site falls within flood zone 1 and therefore has the lowest risk of flooding, however, according to the Council's drainage engineer; Fiery Hill Road to the northwest of the site is subject to sewer flooding. Development should follow the flood risk management hierarchy which will not increase the risk of flooding elsewhere.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality of water, soil and air	0	It is not considered that the development of this site would impact upon this objective.
EV9 Reduce causes	+	The site is located close to public transport options

<b>Barnt Green</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
of and adapt to the impacts of climate change		and this could reduce car based travel and therefore reduce CO2 emissions.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	The site in Barnt Green is not expected to contain any employment development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	The site is not expected to contain any employment development.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	The site is located close to the school in Barnt Green. This gives people greater opportunities to obtain skills and qualifications.

Catshill		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy ensures that 40% affordable housing will be delivered on development sites to help meet local needs.
SO2 To improve the health and well-being of the population and reduce inequalities in health	++	The development site in Catshill is considered to be in sustainable location within walking distance of local facilities and therefore there are likely to be positive benefits in terms of human health and well-being. The site is within 800m of a GP surgery and is less than 200m from Horsegrove Playing fields and North Bromsgrove Playing Fields. This is good access to sports and recreation which can promote healthy lifestyles.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	++	The site is within walking distance of Catshill's main local centre (less than 400m) and a similar distance from Catshill's schools.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Measures to design out crime can be incorporated into any large scale development.
SO5 Increase sustainable travel choices and move towards more sustainable travel	++	There are no train stations near the site; however the site is less than 100m from a regularly serviced bus stop along Stourbridge Road. The main local services including the local school and surgery are within walking distance. All these aspects reduce the need to travel by car.

Catshill		
SA Objectives	SA Effects	Commentary
patterns		
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The development of this site would have no effect on this objective.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	--	There are a number of trees on the site, along with the Battlefield Brook running from north to south. Part of the area once had a SWS status but lost that designation, however the Wildlife Trust believes it has the potential to be restored.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	0	Development will result in the loss of greenfield land, however this site would have little effect on the purposes and integrity of the Green Belt. This site is an ADR and not designated Green Belt. The open space is dominated by urban influences and suffers from urban fringe problems such as trespass and fly tipping. The agricultural land quality is Grade 5 which is unsuitable for agriculture. A small part of the site is subject to a TPO. Although there is a loss of a greenfield land, the site has poor Green Belt credentials, along with the urban influences and poor agricultural grade, which result in development having a neutral effect on this objective.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The site is on greenfield land. The loss of greenfield land is required to meet housing needs and may impact upon landscape character and quality.
EV4 Conserve, protect and enhance	-	High quality design would be expected on any site however this site is adjacent a Grade II Listed

Catshill		
SA Objectives	SA Effects	Commentary
the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.		Church.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Development on every site would be expected to follow the waste hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	--	The Battlefield Brook runs through the site from north to south. The SFRA Level 1 indicates there are misalignments of the flood zone at the north end of the site and approximately 30% of the site is in Flood Zone 2 and approximately 35% is within Flood Zone 3.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality of water, soil and air	-	The site is directly adjacent to the motorway and therefore mitigation will be required to address noise and air quality.
EV9 Reduce causes of and adapt to the impacts of climate	+	The sites are located close to public transport options and this could reduce car based travel and therefore reduce CO2 emissions.



<b>Catshill</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
change		
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	The site in Catshill is not expected to contain any employment development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	The site in Catshill is not expected to contain any employment development.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The site in Catshill is not expected to contain any employment development and therefore the impact will be neutral.

Frankley		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The site has a restrictive covenant which limits its development potential in the short term. It is located on the boundary with Birmingham but has long term development potential in which some affordable housing could be incorporated.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	Site has good access to GP surgeries available in Birmingham and open space in Bromsgrove.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	Site has good access to local facilities in Birmingham and open space and countryside in Bromsgrove.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Development would potentially result in reduction in illegal tipping. Measures to design out crime can be incorporated into any large scale development
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Site is located in a sustainable location in relation to Birmingham in terms of access to local facilities and employment opportunities.
SO6 To provide opportunities for communities to	0	The development of this site would have no effect on this objective.

Frankley		
SA Objectives	SA Effects	Commentary
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	?	Impacts on biodiversity would need to be mitigated against in any development.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	This site is greenfield land and therefore it is inevitable that this will result in the loss of greenfield land. The lack of brownfield land means that greenfield sites have to be used to meet housing targets. Although the development of this site will ensure that Green Belt land is not developed.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	<p>The land is currently used for open space and the restrictive covenant protects this, so in the short term open space provision would be preserved.</p> <p>The site is surrounded by development on three sides and therefore minimising significant wider adverse impacts on landscape character, but inevitably there would be a localised impact on landscape character.</p>
EV4 Conserve, protect and enhance the architectural, cultural and historic	+	No adverse impacts on the historic environment as a result of development have been identified. Further evidence will be gathered and assessed during process of consultation. The policy promotes high

Frankley		
SA Objectives	SA Effects	Commentary
environment heritage and seek well designed, high quality built environment in new development proposals.		quality design which will ensure development retains the character of Bromsgrove. The majority of the sites will not have a direct impact upon any listed buildings or conservation areas.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Any development would adhere to the waste management hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	+	Flood risk has not been identified as a constraint affecting this site.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality of water, soil and air	0	Policies in wider Core Strategy encourage the provision of SUDS in new development. All development has the potential to impact upon water quality. Soil quality is likely to be improved as part of new development. There is suspected current tipping on the site and this will need to be addressed and remedied in any new development.
EV9 Reduce causes of and adapt to the impacts of climate	+	Site is located in a sustainable position close to local facilities which should help to minimise adverse impact on carbon emissions. Policies within the wider

Frankley		
SA Objectives	SA Effects	Commentary
change		Bromsgrove District Plan advocates incorporation of low / zero carbon energy generation in new development.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	The site in Frankley is not expected to contain any employment development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	The site in Frankley is not expected to contain any employment development.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Providing housing close to existing educational facilities gives people greater opportunities to obtain skills and qualifications.

<b>Hagley</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy ensures that 40% affordable housing will be delivered on development sites to help meet local needs.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	This site is located relatively close to health facilities in Hagley but issues of capacity would need to be addressed in any new development, potentially on site.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	This site is located relatively close to local facilities in Hagley but issues of capacity such as at local schools would need to be addressed in any new development. This may involve changes to catchment area criteria at County Council level affecting Hagley schools. The development could include provision for community leisure facilities.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Measures to design out crime can be incorporated into any development.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	This site is located in a sustainable location close to Hagley. It is also suggested that some employment could be included in the development mix thereby reducing the need to travel to work. A transport impact assessment would need to be carried out to assess the impact of new development on existing travel patterns.
SO6 To provide opportunities for	0	This particular policy has no clear affect on this objective.

<b>Hagley</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	-	The site contains a traditional orchard which is a BAP priority habitat and a small number of trees are protected by a TPO. Further work would be required to determine if any notable or protected species are present on the site.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	--	Development site is located on greenfield land and therefore it is inevitable that this will result in the loss of greenfield land. The lack of brownfield land means that greenfield sites have to be used to meet housing targets but this ultimately protects designated Green Belt land.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	This site is greenfield land. The loss of greenfield land is required to meet housing needs and any adverse impact upon landscape character and quality would need to be mitigated.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek	+	High quality design would be expected on any site. There are no listed buildings on or adjacent to the site and therefore no known negative impact upon the historic environment.

<b>Hagley</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
well designed, high quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Any new development would adhere to the waste management hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	Gallows Brook runs through the site. This watercourse will be modelled to assess any flood risk impacts as part of the Level 2 Strategic Flood Risk assessment.  Any new development would be required to incorporate the use of SUDS where feasible to manage surface water run off.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality of water, soil and air	-	The site is adjacent to an Air Quality Management Area (AQMA) which could have an adverse impact on air quality. It is important to note that this issue could be addressed through mitigation measures.  All development has the potential to impact upon water quality and increase demand for water usage. The water conservation hierarchy must be followed and measures will be in place to manage water resources efficiently.
EV9 Reduce causes	+	Site is located in a sustainable position close to local



<b>Hagley</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
of and adapt to the impacts of climate change		facilities. Furthermore as a mixed use scheme is suggested this should assist in reducing the need to travel leading to a reduction in carbon emissions. Policies within the wider Bromsgrove District Plan advocate incorporation of low / zero carbon energy generation in new development.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	Mixed development use could contribute positively to supply of local labour force.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	Potential on site employment provision could have positive benefit for this objective.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Providing housing close to existing educational facilities gives people greater opportunities to obtain skills and qualifications. Potential on site employment provision could have positive benefit for this objective

Ravensbank		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	No affordable housing will be delivered on this employment site.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	The development of this site will not impact upon this objective.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	0	The development of the site will create jobs for people in Redditch.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The development of this site would have no clear affect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	0	The site is well located on the edge of Redditch and therefore could be accessed by sustainable modes of transport.
SO6 To provide opportunities for communities to	0	The development of this site would have no effect on this objective.

Ravensbank		
SA Objectives	SA Effects	Commentary
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	?	The site contains no LWS's or SSSI's although further work is required to assess if there would be other biodiversity impacts. The policy highlights the need to retain and enhance important Green Infrastructure features.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	0	The site is on greenfield land and therefore it is inevitable that this will result in the loss of greenfield land. The lack of brownfield land means that greenfield sites have to be used to meet development targets. Although the development of this site will ensure that Green Belt land is not developed.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The site is on greenfield land. The loss of greenfield land is required to meet employment needs and may impact upon landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high	0	The site is not within nor adjacent to a conservation area and there are no listed buildings located nearby.

Ravensbank		
SA Objectives	SA Effects	Commentary
quality built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Development on every site would be expected to follow the waste hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No flood risk is associated within the site.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality of water, soil and air	0	The development of this site is not expected to impact upon this objective.
EV9 Reduce causes of and adapt to the impacts of climate change	0	Development could create jobs for people in Redditch and prevent some commuting to the Major Urban Area and therefore reduce CO2 emissions.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and	++	The development of the site could boost the knowledge driven economy.

Ravensbank		
SA Objectives	SA Effects	Commentary
skills base whilst ensuring all share the benefits, urban and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	++	The site could incorporate high technology firms.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	New employers may give people in Redditch greater opportunities to obtain skills and qualifications.

Wagon Works/ St Godswalds Road		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	Affordable housing will form a significant part of the development of this site.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The development site to the south of Bromsgrove is considered to be in sustainable location within walking distance of local facilities in Aston Fields and therefore there are likely to be positive benefits in terms of human health and well-being.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The site is located close to local facilities in Aston Fields.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Measures to design out crime can be incorporated into any development
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The site is within walking distance of Bromsgrove Railway station and bus services are also available nearby to ensure that there are sustainable modes of transport available to residents.
SO6 To provide opportunities for communities to	0	The development of this site would have no effect on this objective.

<b>Wagon Works/ St Godswalds Road</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	0	There are currently no statutory designations on the site and an ecological survey has been undertaken as part of the planning application.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	The site is on greenfield land and therefore it is inevitable that this will result in the loss of greenfield land. The lack of brownfield land means that greenfield sites have to be used to meet housing targets. Although the development of this site will ensure that Green Belt land is not developed.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The site is on greenfield land. The loss of greenfield land is required to meet housing needs and may impact upon landscape character and quality. Development is likely to lead to the loss of some trees within the site.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built	0	The site is not within nor adjacent to a conservation area and no listed buildings are located nearby.

Wagon Works/ St Godswalds Road		
SA Objectives	SA Effects	Commentary
environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Development on every site would be expected to follow the waste hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No flood risk is associated within the site.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality of water, soil and air	0	The development of this site is not expected to impact upon this objective.
EV9 Reduce causes of and adapt to the impacts of climate change	+	The site is located close to public transport options and this could reduce car based travel and therefore reduce CO2 emissions. Sites are located close to Bromsgrove railway station which provides enhanced opportunities for sustainable travel.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and	0	The site is not expected to contain any employment development.



Wagon Works/ St Godswalds Road		
SA Objectives	SA Effects	Commentary
skills base whilst ensuring all share the benefits, urban and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	The site is not expected to contain any employment development.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	The site is located close to the schools in South Bromsgrove. This gives people greater opportunities to obtain skills and qualifications.

Wythall		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	The policy ensures that 40% affordable housing will be delivered on development sites to help meet Bromsgrove's needs.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The sites are located relatively close to health facilities in Wythall but issues of capacity would need to be addressed in any new development, potentially on site. Evidence to be gathered as part of consultation process.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The sites are located relatively close to local facilities in Wythall but issues of capacity such as at local schools would need to be addressed in any new development.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Measures to design out crime can be incorporated into any development.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	++	The sites are located in a sustainable location close to Wythall which benefits from having a railway station.
SO6 To provide opportunities for communities to	0	This particular policy has no clear affect on this objective.

Wythall		
SA Objectives	SA Effects	Commentary
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	There are no statutory designations on or adjacent to the sites. Further work would be required to determine if any notable or protected species are present on the sites.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	Development site is located on greenfield land and therefore it is inevitable that this will result in the loss of greenfield land. The lack of brownfield land means that greenfield sites have to be used to meet housing targets. Designated Green Belt land would however not be utilised.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The sites are greenfield land. The loss of greenfield land is required to meet housing needs and any adverse impact upon landscape character and quality would need to be mitigated.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built	+	High quality design would be expected on any site. There are no listed buildings on or adjacent to the site and therefore no negative impact upon the historic environment.

Wythall		
SA Objectives	SA Effects	Commentary
environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	Any new development would adhere to the waste management hierarchy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	Any new development would be required to incorporate the use of SUDS where feasible to manage surface water run off. There is no flood risk associated with the area.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Energy efficiency and energy from low carbon sources would be expected on all development sites.
EV8 Protect and enhance the quality of water, soil and air	0	Policies in wider Core Strategy encourage the provision of SUDS in new development. All development has the potential to impact upon water quality and will need to be mitigated against in any new development.
EV9 Reduce causes of and adapt to the impacts of climate change	++	<p>Development in these locations are close to bus and rail options which promotes travel by sustainable forms potentially reducing CO2 emissions.</p> <p>High quality design can help to tackle climate change through the careful orientation of buildings to achieve passive solar gain and conserve energy. SUDS can also be used to help conserve water e.g. water</p>

Wythall		
SA Objectives	SA Effects	Commentary
		harvesting. However, these measures can be applicable to any new development.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	The site is not expected to contain any employment development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	The site is not expected to contain any employment development.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	There will be no impact on this objective.

## Conclusion

The site specific assessments have highlighted the overall positive impact on sustainability. All sites are well located to encourage travel by sustainable modes of transport whether this is by bus and/or rail. This could reduce car based travel and have a positive impact on CO2 emissions. With the exception of Ravensbank, all of the sites will deliver affordable housing which will help to address the level of need across the District. All of the sites are well located in relation to the existing facilities in their particular settlement which will help to maintain the vitality and viability of local centres in the long term. The appraisal also highlights that none of the sites are in Green Belt locations.

On the downside the assessment highlights that each site is on greenfield land which could cause harm to the natural landscape. However, a lack of brownfield options in the District means that the loss of some greenfield land is inevitable. A number of possible site specific concerns were also identified and these included the impact on noise and air quality, flooding, biodiversity and infrastructure capacity. Each site specific appraisal identifies appropriate mitigation measures that will need to be undertaken before sites are progressed to the planning application stage.

No fundamental reasons have been identified to prevent the allocation of these sites within the Bromsgrove District Plan.

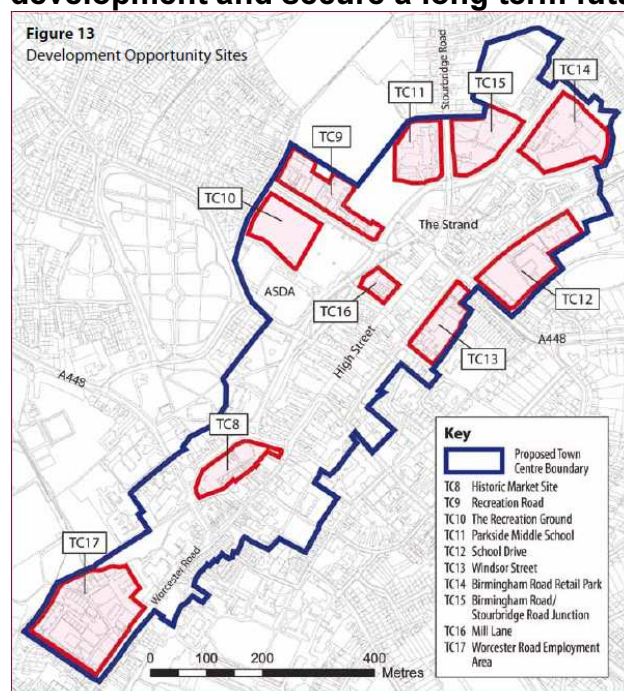
**Appendix D**  
**SA of BDP17 Town Centre Regeneration sites**

**Appendix X**  
**Sustainability Appraisal – BDP17 Town Centre Development Sites**

**BDP17.8 Bromsgrove Town Centre Development Sites**  
 Ten development sites have been identified in Bromsgrove

Reference	Town Centre Site	Area (hectares)	Suitable Use	Development status
BDP17.9	Historic Market Site	0.7	Retail led mixed use	Application pending
BDP17.10	Recreation Road	1.2	Residential (C3/C2)	Short- medium term
BDP17.11	Recreation Ground	1.1	Open space	N/A
BDP17.12	Parkside Middle School	0.7	Office led with public library	Application pending
BDP17.13	School Drive	1.6	Leisure led	Short-medium term
BDP17.14	Windsor Street	0.8	Retail led mixed use	Medium term
BDP17.15	Birmingham Road Retail Park	1.7	Retail - supermarket	Full planning permission
BDP17.16	Birmingham Road/ Stourbridge Road Junction	1.1	Office led mixed use	Long term opportunity
BDP17.17	Mill Lane	0.2	Retail led mixed use	Long term opportunity
BDP17.18	Worcester Road Employment Area	2.3	Employment led	Long term opportunity

Town Centre. The sites provide an opportunity to stimulate development and secure a long term future for Bromsgrove.



### **Table X: Town Centre development opportunity sites**

A Sustainability Appraisal has been carried out for each of the ten sites identified within the Town Centre Regeneration policy.

#### **BDP17.9 Historic Market Site**

**The Historic Market site is a major mixed use development opportunity which the Council will promote for comprehensive redevelopment.**

**The following principles for development will apply:**

**A. Retail led mixed use development scheme will be the primary land use.**

**B. Leisure uses such as cafés, restaurants, and a cinema may also be acceptable on the ground floor. Residential and office uses may be acceptable on upper floors.**

**C. Scale of development to preserve or enhance the surrounding Conservation Area with protection of notable views including the view to St Johns Church.**

**D. Where possible perimeter blocks should be used in line with Policy BDP15.5F.**

**E. Design proposals for the north eastern portion of the site (George House/ Blockbuster) must reflect both its prominence as the termination of the High Street and also as the gateway into the historic market site.**

**F. The Spadesbourne Brook must be considered as part of the public realm element of any proposals, including provision for enhanced walking and cycling opportunities.**

**G. All proposals will be required to contribute to public realm improvement to ensure this site is linked into the wider Town Centre.**

**H. All revised car parking proposals must be consistent with the wider car parking strategy for the Town Centre.**

#### **Key policy strengths**

The redevelopment of the Market Hall site will deliver a number of social benefits. A mixed use scheme would increase the range of services and facilities in the town meaning that local people would have access to a wider range of services. The site has the potential to include some housing which could help meet local needs. The development would also increase activity in the area which would provide natural surveillance that could potentially reduce the possibility of crime.

The policy ensures that the development of the Market Hall site will retain the character of the adjacent conservation and protect important views St Johns Church so there should be a positive impact on the towns historic heritage.

Improvements to walking and cycling are highlighted and this should lead to more people using sustainable modes of transport. This could lead to people using cars less and therefore reduce carbon emissions.

The development of this site has the potential to create employment for local people and promote economic growth, particularly if a large national retailer is attracted to the site. This can help to improve the vitality of the Town centre



and have knock-on benefits in terms of marketing Bromsgrove as a good place to live, work and do business.

By highlighting a development opportunity on a brownfield site this inevitably maximises the use of previously developed land and leads to the sustainable use and development of material assets and reduces the need to travel to more distant service centres offering similar facilities outside the District.

### **Key policy weaknesses**

No clear weaknesses to the policy have been identified

### **Mitigation measures**

None.

### **BDP17.10 Recreation Road**

**The Recreation Road site is a major residential development opportunity. The following development principles will apply**

- A. The predominant land use will be independent retirement led residential units (C3) with inclusive optional care and support services, other acceptable uses are ancillary nursing care (C2) and limited general needs housing.**
- B. Development must have an active frontage onto Recreation Road, and respect the scale of the surrounding buildings and the setting of the adjacent Conservation Area.**
- C. Clear, safe pedestrian access must be provided to the recreation ground opposite.**
- D. 40% of all units will be required to be affordable housing.**

### **Key policy Strengths**

This policy is site specific to Recreation Road, and focuses primarily on the provision of retirement led residential development and affordable housing. The policy meets a number of social objectives, as well as some environmental objectives. Population projections indicate that Bromsgrove has an ageing population and residential development along Recreation Road endeavours to provide housing suitable for the elderly. There is also a large need for affordable housing across the District, which this policy also strives to alleviate by require a figure of 40% affordable housing. The provision of affordable housing and homes for the elderly can reduce social exclusion through reducing barriers to housing for certain sectors of society.

The policy also requires development to respect the scale of surrounding buildings and have active frontages. This is not only to keep in character with the surrounding area, but also to create natural surveillance and reduce the fear of crime around the area.

In terms of environmental objectives, the policy promotes affordable housing, which needs to achieve at least Level 6 of the Code for Sustainable Homes.

The high percentage of affordable units sought as part of this policy will lead to improvements in energy efficiency, thus reducing the causes and helping adapt to the impacts of climate change.

### **Key Policy Weaknesses**

There are no clear weaknesses to this policy.

### **Recommendations for Mitigation**

None

### **BDP17.11 Recreation Ground**

**The Recreation Ground will remain as open space, although enhanced to provide a more attractive and safe community resource. The following enhancements are proposed:**

- A. New hard and soft landscaping which are consistent with public realm proposals for the High Street and the Spadesbourne Brook and which provide clear pedestrian linkages to other areas of the Town Centre.**
- B. The creation of a new distinctive multi-functional public event/performance space.**
- C. New children play facilities constructed with natural materials.**
- D. A fully accessible community garden which incorporates many high sensory elements.**

### **Key policy Strengths**

The policy protects and enhances the existing open space and recreational facilities which clearly has many social and environmental benefits. Access to amenity open space encourages the uptake of recreational facilities and the provision of public event space helps people to get together and know each other. These can help to improve the health of the local population and add to the well-being and vibrancy of communities through creating an improved living environment.

The environmental benefits of safeguarding all of the green infrastructure assets are wide reaching. Whilst the existing ground has little biodiversity value, an enhanced community garden and new soft landscaping can contribute greatly to conserving and enhancing ecological diversity through habitat provision and maintenance or creation of wildlife corridors. The policy also has potential to minimise flood risk through maintaining areas of undeveloped greenspace that will enable precipitation to infiltrate the soil and reduce run-off which can lead to increased flood-risk.

The policy also attempts to make the best use of scarce resources via multi functionality principles.

### **Key Policy Weaknesses**

No clear weaknesses to the policy have been identified.

### **Recommendations for Mitigation**

None.

### **BDP17.12 Parkside Middle School**

**The former Parkside Middle School is a Grade II Listed Building and therefore would have to undergo sympathetic conversion for development potential to be realised. The following development principles will apply:**

- A. Office conversion is considered to be the most suitable use, although other uses may be acceptable.**
- B. Full regard to the buildings listed status will be essential for all proposals.**
- C. Development will be required to contribute to the reinstatement of the avenue of lime trees on Market Street.**

### **Key policy strengths**

The policy promotes the conversion of the Parkside Middle School and planting an avenue of lime trees on Market Street. These can add to the local distinctiveness and enhance the historic heritage of the District, which also acts as a cultural and recreational resource. Indirectly the enhancement of the heritage resource can also form an educational resource as well as the preservation of material assets. The conversion would increase activity in the area which would provide natural surveillance that could potentially reduce the possibility of crime. The planting of lime trees can become habitats for wildlife and serve as a green corridor.

Converting the building into office use has the potential to create employment for local people and promote economic growth. This can help to improve the vitality of the Town Centre and have knock-on benefits in terms of marketing Bromsgrove as a good place to live, work and do business.

Development in a sustainable Town Centre location should lead to more people using sustainable modes of transport rather than travelling by car. This could lead to people using cars less and therefore reduce carbon emissions.

Converting an empty listed building inevitably maximises the use of previously developed land and leads to the sustainable use and development of material assets.

### **Key policy weaknesses**

No clear weaknesses to the policy have been identified.

### **Mitigation measures**

None.

### **BDP17.13 School Drive**

**The School Drive site is a major leisure development opportunity site within the Town Centre, which has an important role to play in integrating the Artrix, Bromsgrove North High School, NEW College and the proposed replacement Fire and Police station into the Town Centre community.**

**Development should meet the following principles:**

**A. A leisure centre with associated parking and complementary uses including possible new public sector facilities will be the predominant use on site.**

**B. Residential development is considered acceptable.**

**C. The new leisure centre should contain, a swimming pool, fitness suite, multifunctional studios, sports hall facilities and ancillary uses such as café/ restaurant will also be acceptable.**

**D. Other small scale retail and commercial development could also be acceptable as part of a comprehensive scheme.**

**E. All buildings must have a frontage onto School Drive and where possible Stratford Road.**

**F. Proposals must be considered in tandem with other major development proposals on Windsor Street, and contribute positively to creating clear functional links between the Town Centre and uses further along School Drive.**

### **Key policy strengths**

The redevelopment of the School Drive site will have a number of social benefits to Bromsgrove Town Centre and the surrounding area. The policy has particular advantages to the health and well-being of the population as its main emphasis is on leisure development. The development will also increase the leisure opportunities across the District, which combined with small scale retail and commercial development, will improve the quality of and equitable access to local services and facilities.

The provision of residential dwellings as part of the redevelopment can also create the opportunity to provide affordable housing. This active mixed use development with active frontages would also assist in reducing crime and the fear of crime.

There are also a small number of economic benefits to the redevelopment of School Drive. A mixed use development will obviously help diversify Bromsgrove Town Centre and create more jobs. The location of the redevelopment will also enhance the links between North Bromsgrove High School, New College and the surrounding area. This can have a positive outcome on the skills and qualifications gained of the potential workforce.

By highlighting a development opportunity on a brownfield site this inevitably maximises the use of previously developed land and leads to the sustainable use and development of material assets and reduces the need to travel to more distant service centres offering similar facilities outside the District.

### **Key policy weaknesses**

No clear weaknesses to the policy have been identified.

### **Mitigation measures**

None.

#### **BDP17.14 Windsor Street**

**The Windsor Street site is a major mixed use development opportunity which has the ability to enhance and expand the Towns retail offer.**

**A. The northern end of the Windsor Street will be developed as a retail led mixed use scheme.**

**B. All development must respect the function, scale and massing of buildings on the High Street in order to complement rather than dominate the Town Centre's retail focus.**

**C. All development at ground level will contain active retail frontages onto Windsor Street and Stratford Road**

**D. Individual Retail floorspace footprints will need to be a minimum of 1000 m<sup>2</sup> to compensate for the lack of larger foot print buildings on the High Street**

**E. Other uses such as office and residential will be encouraged on upper floors.**

**F. Proposals must be considered in tandem with other major development proposals on School Drive.**

#### **Key policy strengths**

The redevelopment of Windsor Street will have a number of social benefits to Bromsgrove Town Centre and the surrounding area. A mixed use scheme would increase the range of services and facilities in the town meaning that local people would have access to a wider range of services. The policy allows for other uses on upper floors for office and/or residential development, which could contribute to meet both local employment and housing needs. Possible residential development would create the opportunity for affordable housing. The policy particularly revolves around retail regeneration; this will improve the quality of and equitable access to retail facilities.

Increased activity due to redevelopment, combined with active retail frontages will provide natural surveillance that could potentially reduce the possibility of crime.

The policy ensures that the development of Windsor Road will retain the character of the adjacent Conservation Area by ensuring that all development will respect the scale and massing of the buildings on the High Street. This will also help conserve and enhance the historic built environment of the Town Centre.

Economically, the policy strives to enhance and expand the retail on offer on a mixed use development site, which will diversify the local economy and create jobs.

By highlighting a development opportunity on a brownfield site this inevitably maximises the use of previously developed land and leads to the sustainable use and development of material assets and reduces the need to travel to more distant service centres offering similar facilities outside the District.

### **Key policy weaknesses**

No clear weaknesses to the policy have been identified.

### **Mitigation measures**

None.

### **BDP17.15 Birmingham Road Retail Park**

The site which is already subject of a development proposal has significant potential for substantial supermarket style retail development. The following principles will apply:

**A. The site will be reconfirmed as a retail site within the Town Centre, which will become part of an extended Primary Shopping Zone.**

**B. Development must be brought forward onto Birmingham Road to reinstate the active street frontage to this important gateway into the Town Centre.**

**C. The listed buildings on Birmingham Road must be retained in their current form and any development proposals must respect the scale of these buildings**

**D. Improved pedestrian and landscaping links with the core of the Town Centre must form part of any comprehensive development proposals.**

**E. Open space to the rear of the existing store will be retained and form part of the enhanced Spadesbourne Brook.**

**F. Improvements will also be required to the road infrastructure at the junction of Stourbridge Road, Birmingham Road, Market Street and the Strand.**

### **Key policy strengths**

The redevelopment of the retail park will deliver a number of social benefits. The introduction of a large retail store would increase the range of retail facilities on offer in the town providing choice for residents. The development will reinstate a street frontage which would increase activity in the area which would provide natural surveillance that could potentially reduce the possibility of crime.

The policy ensures that the development of the site will retain the character and setting of the listed buildings within the site therefore there should be a positive impact on the town's historic heritage.

Improvements to pedestrian linkages highlighted should lead to more people using sustainable modes of transport and also encourage more people who use the retail park to enter into the town centre. This could lead to people using cars less and therefore reduce carbon emissions.

The development of this site has the potential to create employment for local people and promote economic growth, particularly if a large national retailer is attracted to the site. This can help to improve the vitality of the Town centre and have knock-on benefits in terms of marketing Bromsgrove as a good place to live, work and do business.

By highlighting a development opportunity on a brownfield site this inevitably maximises the use of previously developed land and leads to the sustainable use and development of material assets and reduces the need to travel to more distant service centres offering similar facilities outside the District.

#### **Key policy weaknesses**

No clear weaknesses to the policy have been identified.

#### **Mitigation measures**

None.

#### **BDP17.16 Birmingham Road / Stourbridge Road Junction**

**This site offers an opportunity for office led mixed use development. The following development principles will apply**

**A. A perimeter block arrangement will be encouraged to reinstate street frontages.**

**B. High quality distinctive architecture will be required to establish the Parkside Crossroads as a key gateway into the town.**

**C. The scale of the development on Birmingham Road would need to respect development taking place on the Birmingham Road Retail Park.**

**D. The Stourbridge Road frontage would need to have regard to the former Parkside School opposite.**

#### **Key policy strengths**

The redevelopment of the site will deliver a number of social benefits. A mixed use scheme would increase the range of services and facilities in the town meaning that local people would have access to a wider range of services. An element of the mixed use scheme could be residential which could help meet local needs. The development will reinstate a street frontage which would increase activity in the area which would provide natural surveillance that could potentially reduce the possibility of crime.

The policy ensures that the development of the site will retain the character and setting of the adjacent listed building therefore there should be a positive impact on the town's historic heritage.

Development in a sustainable Town Centre location should lead to more people using sustainable modes of transport rather than travelling by car. This could lead to people using cars less and therefore reduce carbon emissions.

The development of this site has the potential to create employment for local people and promote economic growth, by expanding the office sector in the town. This can help to improve the vitality of the Town Centre and have knock-on benefits in terms of marketing Bromsgrove as a good place to live, work and do business.

By highlighting a development opportunity on a brownfield site this inevitably maximises the use of previously developed land and leads to the sustainable

use and development of material assets and reduces the need to travel to more distant service centres offering similar facilities outside the District.

### **Key policy weaknesses**

No clear weaknesses to the policy have been identified.

### **Mitigation measures**

None.

### **BDP17.17 Mill Lane**

**This site offers a longer term opportunity for retail led mixed use development. The following development principles will apply:**

**A. At ground floor level A1 retail uses are to be the predominant use with upper floors suitable for office and residential development.**

**B. The scale of retail development is to be determined although the scope to include larger retail spaces must be considered.**

**C. Proposals must include details of public realm improvement on Mill Lane and the creation of an enhanced public space and would require a development which reflects the role of this space as a ‘town square’.**

**D. Spaces to the rear of the current buildings which are adjacent to the Brook must have full regard to the enhanced environment created by the naturalised Spadesbourne Brook.**

**E. The current pedestrian thoroughfare along Mill Lane will be protected in any development proposals.**

### **Key policy strengths**

The redevelopment of the Mill Lane site will have a number of social benefits to Bromsgrove Town Centre and the surrounding area. A mixed use scheme would increase the range of services and facilities in the town meaning that local people would have access to a wider range of services.

The policy allows for other uses on upper floors for office and/or residential development, which could contribute to meet both local employment and housing needs. Possible residential development would create the opportunity for affordable housing. The policy particularly revolves around retail regeneration; this will improve the quality of and equitable access to local services and facilities to a wide range of the District’s population.

Increased activity due to public realm improvements and enhanced public space, combined with active retail frontages will provide natural surveillance that could potentially reduce the possibility of crime.

Environmentally, the policy requires spaces to the rear of current buildings which are adjacent to the brook to have full regard to the enhanced environment created by the naturalised Spadesbourne Brook. This will have a positive effect on the biodiversity within the Town Centre, strengthening landscape character and improving water quality.



Economically, the policy strives to enhance and expand the retail on offer on a mixed use development site, which will diversify the local economy and create jobs.

By highlighting a development opportunity on a brownfield site this inevitably maximises the use of previously developed land and leads to the sustainable use and development of material assets and reduces the need to travel to more distant service centres offering similar facilities outside the District.

#### **Key policy weaknesses**

No clear weaknesses to the policy have been identified.

#### **Mitigation measures**

None.

#### **BDP17.18 Worcester Road Employment Area**

**Proposals for new employment uses will be supported within the existing employment allocation. Subject to BDP14 other uses may be acceptable where it can be demonstrated that they support the wider enhancement of the Town Centre and do not compromise the existing retail core of the Town Centre.**

**Any major redevelopment proposals should reflect the linear nature of the Town with active frontages along Worcester Road, although opportunities exist for a wide range and scale of design approaches on other areas of the site. The eastern edge bounded by the Spadesbourne Brook and Sanders Park must address these features and where possible look to use these features as a positive design element.**

#### **Key policy strengths**

The redevelopment of the Worcester Road Employment site will have a number of social benefits to Bromsgrove Town Centre and the surrounding area. A mixed use scheme would increase the range of services and facilities in the town meaning that local people would have access to a wider range of services.

Increased activity due to a wider mix of uses on the site will provide natural surveillance that could potentially reduce the possibility of crime.

The policy is located adjacent to the Town Centre Conservation Area. Good design that reflects the linear nature of the street will improve the setting of the conservation area.

Economically, the policy strives to enhance and expand employment opportunities on offer on the development site, which will diversify the local economy and create jobs.

By highlighting a development opportunity on a brownfield site this inevitably maximises the use of previously developed land and leads to the sustainable use and development of material assets and reduces the need to travel to more distant service centres offering similar facilities outside the District.

Environmentally, the policy requires developments to pay regards to the Spadesbourne Brook and Sanders Park. This will have a positive effect on the biodiversity within the town centre, strengthening the green corridors, reducing the risk of flooding and improving water quality.

**Key policy weaknesses**

No clear weaknesses to the policy have been identified.

**Mitigation measures**

None.

Historic Market Site		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy states that some residential accommodation may be acceptable and therefore there could be an opportunity for some affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy states that development must consider the Spadesbourne Brook and Public Realm which includes provision for enhancing walking and cycling opportunities which will have a positive impact on health.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	++	The development of this site could potentially increase retail provision and also provide a wider range of leisure uses thereby attracting local residents and positively impacting vitality and viability of Bromsgrove Town Centre.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The development of this site would lead to increasing activity/ natural surveillance which both reduces the potential for crime and also reduce the fear of crime.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The policy highlights the potential for enhanced walking and cycling facilities adjacent to the Spadesbourne Brook which should lead to more people using these sustainable modes of transport.
SO6 To provide opportunities for communities to	0	No direct impact of this policy has been identified

Historic Market Site		
SA Objectives	SA Effects	Commentary
participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	+	The development of the site will lead to public realm improvements associated with the rerouted Spadesbourne Brook.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	++	The policy actively promotes the development of a brownfield site. By its very nature will preserve the countryside as activity will be focussed on the Town Centre.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	The development of a brownfield site by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre thereby preserving wider landscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built	+	The policy makes it clear that development of the market hall site must reflect the surrounding conservation area and retain important views to St. Johns Church.

Historic Market Site		
SA Objectives	SA Effects	Commentary
environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	The policy does not have a direct impact on waste.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact of this policy has been identified.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The residential element of the site could have a certain percentage of affordable housing. Affordable housing schemes need to achieve at least Level 6 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. Through the tightening of the Building Regulations, redevelopment will ensure that new buildings are more energy efficient.
EV8 Protect and enhance the quality of water, soil and air	+	The policy makes reference to the re-routed Spadesbourne Brook and opportunities for enhanced walking and cycling. The improvements to the Spadesbourne Brook may have a positive impact on water quality whilst the promotion of sustainable modes of travel may reduce car usage which could improve air quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	Improvements in walking and cycling facilities may reduce CO2 emissions.
Economic Objectives		

<b>Historic Market Site</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	++	The policy strives to enhance and expand the offer in the town centre, which will diversify the local economy and create jobs.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	No direct impact of this policy has been identified.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	No direct impact of this policy has been identified.

<b>Recreation Road</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	This policy strives to provide a major residential development opportunity that will meet local needs in terms of providing affordable housing and retirement led dwellings.

Recreation Road		
SA Objectives	SA Effects	Commentary
SO2 To improve the health and well-being of the population and reduce inequalities in health	?	Although the provision of affordable housing and properties for the elderly does not directly affect health, it could be argued that if people can afford a decent place to live then this could improve their well-being. Housing for the elderly is also normally made to building for life standards, which can have positive effects wellbeing.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	Provision of affordable homes can reduce social exclusion through reducing barriers to housing for poorer sectors of society. In addition by providing safe access to the Recreation Ground, residents will be able to access the Town Centre shopping areas more easily which will contribute to the vitality and viability of the Town Centre.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The policy requires development to have active frontages, which would help create natural surveillance on to Recreation Road.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The policy highlights for clear, safe pedestrian access which should lead to more pedestrians into the town centre leading to increased sustainable travel.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	No direct impact identified.

Recreation Road		
SA Objectives	SA Effects	Commentary
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	No direct impact identified.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	++	The policy actively promotes the redevelopment of a brownfield site. By its very nature will preserve the countryside, as activity will be focussed on the Town Centre.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	This policy requires development along Recreation Road to respect the scale of surrounding buildings, which would be in keeping with the character of the surrounding area.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	No direct impact identified of policy in this respect. The policy seeks to respect the setting of the adjacent Conservation Area and the scale of surrounding buildings.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2)	0	No direct impact identified of policy in this respect.



Recreation Road		
SA Objectives	SA Effects	Commentary
preparing for reuse, 3) recycling, 4) other recovery, 5) disposal		
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact identified of policy in this respect.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	Affordable housing schemes need to achieve at least Level 6 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. Through the tightening of the Building Regulations, redevelopment will ensure that new buildings are more energy efficient.
EV8 Protect and enhance the quality of water, soil and air	0	No direct impact identified of policy in this respect.
EV9 Reduce causes of and adapt to the impacts of climate change	0	Affordable housing schemes need to achieve at least Level 6 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. This policy can therefore directly reduce causes of and adapt to the impacts of climate change.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	No direct impact identified of policy in this respect.
EC2 promote and support the	0	No direct impact identified of policy in this respect.

Recreation Road		
SA Objectives	SA Effects	Commentary
development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	No direct impact identified of policy in this respect.

Recreation Ground		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	The policy does not directly affect this objective.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The retention and enhancement of the Recreation Ground for recreation and amenity will improve the living environment and is likely to improve the health and well being of the population.
SO3 Improve the vitality and viability of Town centres,	+	Safeguarding green infrastructure assets and the creation, maintenance and enhancement of open space and recreational facilities contributes positively

Recreation Ground		
SA Objectives	SA Effects	Commentary
other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment		to this objective.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Better design and improvement of this site would lead to increasing activity/ natural surveillance which both reduces the potential for crime and also reduce the fear of crime.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	This policy advocates the provision of clear pedestrian linkages to other areas of the Town Centre which could be used for recreational purposes and travel.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	+	The enhancement of the Recreation Ground and creation of the new distinctive multi functional public event space will contribute positively to this objective.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	+	The retention and enhancement of open space and safeguarding all green infrastructure assets will have a positive impact on biodiversity (for example green corridors).
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most	+	Enhancing the Recreation Ground through new landscaping, new multi function public event space, new community garden and new children play facilities are likely to increase its use and hence contribute positively to this objective.

Recreation Ground		
SA Objectives	SA Effects	Commentary
versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.		
EV3 Safeguard and strengthen landscape and townscape character and quality	+	Retention of the open space will safeguard the landscape character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	The policy does not directly affect this objective.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	The policy does not directly affect this objective.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or	+	The policy has the potential to minimise flood risk through maintaining areas of undeveloped greenspace that will enable rainfall to permeate the soil and reduce run-off.

Recreation Ground		
SA Objectives	SA Effects	Commentary
contribute to surface water flooding in all other areas		
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	This policy has no direct impact on this objective.
EV8 Protect and enhance the quality of water, soil and air	+	Maintaining areas of undeveloped greenspace that will enable rainfall to permeate the soil will help to maintain the quality of water that flow to the nearby watercourses.
EV9 Reduce causes of and adapt to the impacts of climate change	+	Providing clear pedestrian linkages to other areas of the Town Centre can encourage walking and reduce the use of private cars.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	This policy does not affect this objective.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	This policy does not affect this objective.
EC3 To raise the skills levels and qualifications of workforce and quality of educational	0	This policy does not affect this objective.

Recreation Ground		
SA Objectives	SA Effects	Commentary
opportunities for all		

Parkside Middle School		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	The policy is unlikely to have any impact on this objective as the conversion will be predominantly office based.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	The policy has no clear effect on this objective.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	The development of this site would potentially increase office provision, which may positively impact on viability of services and increased penetration to the Town Centre.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The development of this site would lead to increasing activity/ natural surveillance which both reduces the potential for crime and also reduce the fear of crime.
SO5 Increase	+	Promoting office development in the Town Centre which is better connected by public transport is likely

<b>Parkside Middle School</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
sustainable travel choices and move towards more sustainable travel patterns		to encourage walking and cycling instead of private car use.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	The policy has no clear effect on this objective.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	+	Reinstating the avenue of lime trees on Market Street is creating/ enhancing the habitats for wildlife.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	++	The policy actively promotes the redevelopment of a brownfield site. By its very nature will preserve the countryside as activity will be focussed on the Town Centre.
EV3 Safeguard and strengthen landscape and townscape character	++	Preservation of listed building will enhance the historic landscape character of the town centre area.

Parkside Middle School		
SA Objectives	SA Effects	Commentary
and quality		
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	++	Preserving the listed building and converting it to suitable use can conserve and enhance the historic built environment heritage.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	+	The conversion of buildings reusing existing materials; and the use of salvaged materials in traditional style is supported by this policy.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	The policy has no clear effect on this objective.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The policy has no clear effect on this objective.
EV8 Protect and enhance the quality of water, soil and air	+	Reinstating the avenue of lime trees on Market Street is likely to improve the air quality and noise impact of traffic to surrounding areas.
EV9 Reduce causes	+	Reinstating the avenue of lime trees will absorb



<b>Parkside Middle School</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
of and adapt to the impacts of climate change		carbon dioxide and reduce the causes of climate change.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	Converting the building into office use will create jobs and increase the amount of office space in the town centre.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	The policy has no clear effect on this objective.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The policy has no clear effect on this objective.

<b>School Drive</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local	+	The policy states that residential development is considered acceptable at the northern edge of the site and therefore there could be an opportunity for some affordable housing.

<b>School Drive</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
environment		
SO2 To improve the health and well-being of the population and reduce inequalities in health	++	This policy will have major benefits on the health and well-being of the of Bromsgrove's population as it provides leisure facilities to the community. This will include a number of facilities including a swimming pool, fitness suite, multifunctional studios and a sports hall.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	++	The development of this site will provide greater access to a number of key services, including leisure facilities, some elements of retail and possible civic facilities, and the fire and police services.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The policy requires buildings to have frontages onto School Drive and the Stratford Road, which would create natural surveillance, reducing crime and the fear of crime.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The policy highlights for improved links with the Town Centre which should lead to more people using sustainable modes of transport.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	No direct impact identified of policy in this respect.

School Drive		
SA Objectives	SA Effects	Commentary
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	No direct impact identified of policy in this respect.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	++	The policy actively promotes the redevelopment of a brownfield site. By its very nature will preserve the countryside, as activity will be focussed on the Town Centre.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	The development of a brownfield site by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre thereby preserving wider landscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	No direct impact identified of policy in this respect.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2)	0	No direct impact identified of policy in this respect.

School Drive		
SA Objectives	SA Effects	Commentary
preparing for reuse, 3) recycling, 4) other recovery, 5) disposal		
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact identified of policy in this respect.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The residential element of the site could have a certain percentage of affordable housing.  Affordable housing schemes need to achieve at least Level 6 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. Through the tightening of the Building Regulations, redevelopment will ensure that new buildings are more energy efficient.
EV8 Protect and enhance the quality of water, soil and air	0	No direct impact identified of policy in this respect.
EV9 Reduce causes of and adapt to the impacts of climate change	+	New development in a sustainable location may encourage greater use of public transport which could reduce CO2 emissions.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	The redevelopment of the site will diversify the local economy and create jobs. The redevelopment of School Drive will also create better links with North Bromsgrove High School, New college and the surrounding area, which will contribute to an improved skills base.
EC2 promote and support the	0	No direct impact of this policy has been identified.

<b>School Drive</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	+	Although the redevelopment will not have a direct impact on this objective, by rejuvenating the area, New College and North Bromsgrove High School will have greater appeal which in turn can assist skill levels and qualifications gained.

<b>Windsor Street</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy states that some residential accommodation will be encouraged on upper floors and therefore there could be an opportunity for some affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	No direct impact identified of policy in this respect.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to	++	Policy supports regeneration of Windsor Street which will encourage improved provision of facilities particularly in the longer term, especially those related to retail.

<b>Windsor Street</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment		
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Policy supports regeneration of Windsor Street which is likely to have a positive impact on reducing levels of crime ie by increasing activity / natural surveillance this both reduces fear of crime and more people equals less opportunity for crime to occur. This is reinforced in the policy by advocating active retail frontages on the ground level.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Promoting more residential development above shops in the Town Centre which is better connected by public transport are likely to encourage walking and cycling instead of private car use.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	No direct impact identified of policy in this respect.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	0	No direct impact identified of policy in this respect.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural	++	The policy actively promotes the development of Windsor Street, which is a brownfield site. By its very nature this will preserve the countryside as activity will be focussed on the Town Centre.

Windsor Street		
SA Objectives	SA Effects	Commentary
land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.		
EV3 Safeguard and strengthen landscape and townscape character and quality	+	Town Centre regeneration by its very nature will preserve the countryside, as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre thereby preserving wider landscape quality and character. The policy also states that all development must respect the scale and massing of the buildings on the High Street. This will allow new development to keep in character to the area.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	++	The policy states that all development must respect the scale and massing of the buildings on the High Street. This will allow new development to keep in character to the area, thus enhancing the historic built environment.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	No direct impact identified of policy in this respect.
EV6 Ensure inappropriate development does not occur in high risk flood prone areas and does not	0	No direct impact identified of policy in this respect.

Windsor Street		
SA Objectives	SA Effects	Commentary
adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas		
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The residential element of the site could have a certain percentage of affordable housing. Affordable housing schemes need to achieve at least Level 6 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. Through the tightening of the Building Regulations, redevelopment will ensure that new buildings are more energy efficient.
EV8 Protect and enhance the quality of water, soil and air	0	No direct impact identified of policy in this respect.
EV9 Reduce causes of and adapt to the impacts of climate change	+	New development in a sustainable location may encourage greater use of public transport which could reduce CO2 emissions.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	++	The policy strives to enhance and expand the retail on offer on a mixed use development site, which will diversify the local economy and create jobs.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	No direct impact identified of policy in this respect.
EC3 To raise the skills levels and qualifications of	0	No direct impact identified of policy in this respect.



<b>Windsor Street</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
workforce and quality of educational opportunities for all		

<b>Birmingham Road Retail Park</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	No direct impact of this policy has been identified.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	No direct impact of this policy has been identified.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	++	The development of this site would potentially increase retail provision providing greater choice for local communities.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The reinstatement of a street frontage would lead to increasing activity/ natural surveillance which both reduces the potential for crime and also reduce the

Birmingham Road Retail Park		
SA Objectives	SA Effects	Commentary
		fear of crime.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The policy highlights for improved pedestrian links with the Town Centre which should lead to more people using sustainable modes of transport.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	No direct impact of this policy has been identified.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	+	The development of the site will retain the open space at the rear and includes enhancements to the Spadesbourne Brook.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	++	The policy actively promotes the development of a brownfield site. By its very nature will preserve the countryside as activity will be focussed on the Town Centre.
EV3 Safeguard and strengthen	+	The development of a brownfield site by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of

Birmingham Road Retail Park		
SA Objectives	SA Effects	Commentary
landscape and townscape character and quality		existing resources in the Town Centre thereby preserving wider landscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	+	The policy makes it clear that development of the retail unit must maintain and enhance the setting of the listed buildings on site.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	The policy does not have a direct impact on waste.
E6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact of this policy has been identified.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The policy makes no explicit reference to renewable energy.
EV8 Protect and enhance the quality	+	The policy makes reference to enhancing the Spadesbourne Brook, this could lead to improvements in water quality. The policy highlights

<b>Birmingham Road Retail Park</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
of water, soil and air		improved pedestrian links with the Town Centre. The promotion of sustainable modes of travel may reduce car usage which could improve air quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	Improvements in pedestrian links may reduce CO2 emissions.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	++	The development of large retail store will expand the retail on offer, create jobs and could be a catalyst for further development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	No direct impact of this policy has been identified.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	No direct impact of this policy has been identified.

<b>Birmingham Road / Stourbridge Road</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing	+	An office lead mixed use scheme could contain some residential development. Some affordable accommodation could be included.

Birmingham Road / Stourbridge Road		
SA Objectives	SA Effects	Commentary
for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment		
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	It is not considered that the development of this site will impact on this objective.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	+	A mixed use development may give the local population access to a wider range of services and facilities.
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The reinstatement of street frontages would lead to increasing activity/ natural surveillance which both reduces the potential for crime and also reduce the fear of crime.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Concentrating development in the most sustainable locations maximises the opportunity for people to use public transport.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood	0	No direct impact of this policy has been identified.

Birmingham Road / Stourbridge Road		
SA Objectives	SA Effects	Commentary
and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	The policy does not directly address biodiversity or geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	++	The policy actively promotes the development of a brownfield site. By its very nature will preserve the countryside as activity will be focussed on the Town Centre.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	The development of a brownfield site by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre thereby preserving wider landscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	+	The policy makes it clear that development must be of high quality distinctive architecture to establish the Parkside Crossroads as a key gateway into the town.

Birmingham Road / Stourbridge Road		
SA Objectives	SA Effects	Commentary
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	The policy does not have a direct impact on waste.
E6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	0	No direct impact of this policy has been identified.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	+	The residential element of the site could have a certain percentage of affordable housing. Affordable housing schemes need to achieve at least Level 6 of the Code for Sustainable Homes. This policy can therefore directly improve energy efficiency by delivering a higher percentage of affordable units. Through the tightening of the Building Regulations, redevelopment will ensure that new buildings are more energy efficient.
EV8 Protect and enhance the quality of water, soil and air	0	No direct impact of this policy has been identified.
EV9 Reduce causes of and adapt to the impacts of climate change	+	New development in a sustainable location may encourage greater use of public transport which could reduce CO2 emissions.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban	+	A mixed use development will create jobs and increase the amount of office space in the town centre.

<b>Birmingham Road / Stourbridge Road</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
and rural		
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	No direct impact of this policy has been identified.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	No direct impact of this policy has been identified.

<b>Mill Lane</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	The policy states that some residential accommodation will be encouraged on upper floors and therefore there could be an opportunity for some affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	No direct impact identified of policy in this respect, although improvement to the public realm and enhanced public space in terms of a 'town square' could improve shoppers experience of the Town Centre.
SO3 Improve the vitality and viability of Town centres,	++	Policy supports regeneration of Mill Lane which will encourage improved provision of facilities particularly in the longer term, especially those related to retail.



Mill Lane		
SA Objectives	SA Effects	Commentary
other centres and communities and the quality of and equitable access to local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment		
SO4 Reduce crime, fear of crime and anti-social behaviour	+	Regeneration of Mill Lane will provide active frontages which will increase the natural surveillance of the area. Improvement of the public realm and the retention of the pedestrian thoroughfare will result in a high usage of Mill Lane, which also reduces crime and the fear of crime.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The retention of the thoroughfare along Mill Lane will encourage walking and cycling through the Town Centre.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	+	The proposal of improving the public realm and creating an enhanced public space in the form of a 'town square' will contribute positively to this objective.
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	++	The development of the site will contribute to the enhanced environment along the naturalised Spadesbourne Brook.
EV2 Ensure efficient use of land through safeguarding of	++	The policy actively promotes the development of Mill Lane, which is a brownfield site. By its very nature this will preserve the countryside as activity will be

Mill Lane		
SA Objectives	SA Effects	Commentary
mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.		focussed on the Town Centre.
EV3 Safeguard and strengthen landscape and townscape character and quality	+	Town Centre regeneration by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre thereby preserving wider landscape quality and character. The policy also advocates buildings must have full regard to the enhanced natural environment created by the naturalised Spadesbourne Brook.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	+	Public Realm improvements will assist in enhancing the historic built environment.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	No direct impact identified of policy in this respect.
E6 Ensure inappropriate development does not occur in high risk	0	To contribute to the environment along the naturalised Spadesbourne Brook, it is very likely that fluvial and pluvial flood risks will be taken into account.

Mill Lane		
SA Objectives	SA Effects	Commentary
flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas		
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The policy is unlikely to impact on this objective.
EV8 Protect and enhance the quality of water, soil and air	+	The policy makes reference to the naturalised Spadesbourne Brook and opportunities for enhancing this environment must be taken into account by surrounding buildings. The improvements to the Spadesbourne Brook may have a positive impact on water quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	New development in a sustainable location may encourage greater use of public transport which could reduce CO2 emissions.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	++	The development of larger retail space will expand the retail on offer, create jobs and could be a catalyst for further development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	0	No direct impact identified of policy in this respect.

<b>Mill Lane</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	No direct impact identified of policy in this respect.

<b>Worcester Road Employment Area</b>		
<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	The policy promotes several possible uses for the site but residential has not been highlighted. The policy will therefore not impact on this objective.
SO2 To improve the health and well-being of the population and reduce inequalities in health	+	The policy supports design of developments that pay regards to the Spadesbourne Brook and Sanders Park. This will encourage occupants to visit the nearby green space and could improve wellbeing of occupants and nearby residents.
SO3 Improve the vitality and viability of Town centres, other centres and communities and the quality of and equitable access to local services and facilities regardless	+	The policy supports a mix of uses including leisure and retail. This will improve access for Bromsgrove residents.

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<b>SA Objectives</b>	<b>SA Effects</b>	<b>Commentary</b>
of age, gender, ethnicity, disability, socio-economic status or educational attainment		
SO4 Reduce crime, fear of crime and anti-social behaviour	+	The redevelopment of this site with a wider mix uses may mean that there are active frontages for longer periods of the day which will increase natural surveillance. This could potentially reduce crime in the long term.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	The redevelopment of the site may create jobs for local people which may reduce the need for some people to travel. The site is viewed as a long term development opportunity therefore improvements are not expected in the long term.
SO6 To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	0	No direct impact on this objective has been identified.
<b>Environmental Objectives</b>		
EV1 To conserve and enhance biodiversity and geodiversity	+	The policy supports design of developments that pay regards to the Spadesbourne Brook and Sanders Park.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously	++	The policy actively promotes the development of the Worcester Road Employment Area, which is a brownfield site. By its very nature this will preserve the countryside as activity will be focussed on the Town Centre.

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developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.		
EV3 Safeguard and strengthen landscape and townscape character and quality	+	Town Centre regeneration by its very nature will preserve the countryside as activity will be focussed on the Town Centre and making the best of existing resources in the Town Centre thereby preserving wider landscape quality and character.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	+	The site is located adjacent to the conservation area. The policy promotes good design which would improve the setting of the conservation area.
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	No direct impact identified of policy in this respect.
E6 Ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas	+	To contribute to the environment along the naturalised Spadesbourne Brook, it is very likely that fluvial and pluvial flood risks will be taken into account.
EV7 Promote resource efficiency	0	No direct impact on this objective has been identified.

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and energy generated from renewable energy and low carbon sources		
EV8 Protect and enhance the quality of water, soil and air	+	The policy supports development that has regard to the Spadesbourne Brook, this will potentially improve the Spadesbourne Brook and have a positive impact on water quality.
EV9 Reduce causes of and adapt to the impacts of climate change	+	New development in a sustainable location may encourage greater use of public transport which could reduce CO2 emissions.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	The development of a mixed use scheme will create jobs and could be a catalyst for further development.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives	+	This policy supports developments that are flexible and take into account of the economic challenges of businesses. The flexibility is likely to encourage businesses involved in new technologies.
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The policy will not impact on this objective.

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