



BROMSGROVE DISTRICT COUNCIL

YOU ARE HEREBY SUMMONED to attend a MEETING of BROMSGROVE DISTRICT COUNCIL to be held in the Council Chamber at Parkside Suite - Parkside at 6.00 p.m. on Wednesday 25th January 2017, when the business referred to below will be brought under consideration:-

The formal business will be preceded by a prayer.

1. **To receive apologies for absence**

2. **Declarations of Interest**

To invite Councillors to declare any Disclosable Pecuniary Interests or Other Disclosable Interests they may have in items on the agenda, and to confirm the nature of those interests.

3. **To confirm the accuracy of the minutes of the meeting of the Council held on 23rd November 2016 (Pages 1 - 12)**

4. **To receive any announcements from the Chairman and/or Head of Paid Service**

5. **To receive any announcements from the Leader**

6. **To receive comments, questions or petitions from members of the public**

A period of up to 15 minutes is allowed for members of the public to make a comment, ask questions or present petitions. Each member of the public has up to 3 minutes to do this. A councillor may also present a petition on behalf of a member of the public.

7. **Recommendations from the Cabinet (Pages 13 - 16)**

To consider the recommendations from the meetings of the Cabinet held on 7th December 2016 and 11th January 2017

7th December 2016

- New Homes Bonus Community Grants Panel
- Car Park Order Review
- Fees and Charges 2017/18
- Business Waste Recycling Service (the background papers to this item are confidential)

11th January 2017

- Bromsgrove District Plan 2011-2030 Adoption

The background papers to the recommendations are contained at the back of the Council agenda

8. **To receive the minutes of the meetings of the Cabinet held on 7th December 2016 and 11th January 2017** (Pages 17 - 32)

9. **Report and Recommendations of the Independent Remuneration Panel** (Pages 33 - 48)

The Independent Remuneration Panel makes recommendations to the Council about the level of allowances to which the Council “has regard”. The Panel’s report for 2017/18 is enclosed.

10. **To receive and consider a report from the Portfolio Holder for Environment and Worcestershire Regulatory Services** (Pages 49 - 62)

Up to 30 minutes is allowed for this item; no longer than 10 minutes for presentation of the report and then up to 3 minutes for each question to be put and answered.

11. **Questions on Notice (to be circulated at the meeting)**

A period of up to 15 minutes is allocated for the asking and answering of questions. This may be extended at the discretion of the Chairman with the agreement of the majority of those present.

To deal with any questions on notice from Members of the Council, in the order in which they have been received.

12. **Motions on Notice (to follow if any)**

A period of up to one hour is allocated to consider the motions on notice. This may only be extended with the agreement of the Council.

Background information on the recommendation from the Cabinet on New Homes Bonus_(Pages 63 - 68)

Background information on the recommendation from the Cabinet on the Car Park Order on Fees and Charges_(Pages 69 - 74)

Background Information on the recommendations from the Cabinet on Fees and Charges 2017/18_(Pages 75 - 104)

Background Information on the recommendations from the Cabinet on Bromsgrove District Plan 2011-2030_(Pages 105 - 252)

13. **To consider, and if considered appropriate, to pass the following resolution to exclude the public from the meeting during the consideration of the item of business containing exempt information:-**

"RESOLVED: that under Section 100 I of the Local Government Act 1972, as amended, the public be excluded from the meeting during the consideration of the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Part I of Schedule 12A to the Act, as amended, the relevant paragraph of that part, in each case, being as set out below, and that it is in the public interest to do so:-

<u>Item No.</u>	<u>Paragraph(s)</u>	
14	3	"

14. **Background Information to recommendations from Cabinet on Business Waste Recycling Service (Pages 253 - 302)**

K. DICKS
Chief Executive

Parkside
Market Street
BROMSGROVE
Worcestershire
B61 8DA

TO ALL MEMBERS OF THE BROMSGROVE DISTRICT COUNCIL

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE COUNCIL

23RD NOVEMBER 2016 AT 6.00 P.M.

PRESENT: Councillors M. Glass (Vice-Chairman), S. J. Baxter, C. J. Bloore, M. T. Buxton, S. R. Colella, B. T. Cooper, R. J. Deeming, G. N. Denaro, R. L. Dent, J. M. L. A. Griffiths, C.A. Hotham, R. E. Jenkins, R. J. Laight, L. C. R. Mallett, K.J. May, C. M. McDonald, P. M. McDonald, S. R. Peters, S. P. Shannon, M. A. Sherrey, R. D. Smith, C. J. Spencer, C. B. Taylor, P.L. Thomas, M. Thompson, L. J. Turner, S. A. Webb and P. J. Whittaker.

58\16 **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors C. Allen - Jones and H. J. Jones.

59\16 **DECLARATIONS OF INTEREST**

There were no Declarations of Interest at this stage.

60\16 **FORMER COUNCILLOR P. LAMMAS**

The Chairman held a minutes silence in memory of the late Councillor P. Lammas. Members and officers stood in silence in tribute to his memory.

Councillors G. N. Denaro and L. C. R. Mallett both paid tribute to Councillor Lammas and recognised the work which he had undertaken on behalf of Bromsgrove. Sincere condolences were expressed on behalf of Members to his family.

Thanks were expressed to all Members, officers and members of the public for their condolences and it was noted that a book of condolence had been arranged and was available from the Chairman's Secretary.

61\16 **MINUTES**

The minutes of the meeting of the Council held on 21st September 2016 were submitted.

RESOLVED that the minutes of the meeting of the Council held on 21st September 2016 be approved.

The minutes of the meeting of the Council held on 13th October 2016 were submitted.

Councillor L. C. R. Mallett drew attention to the question he had asked at that meeting i.e. Would the Leader resign if the Efficiency Plan was not delivered?.

RESOLVED that the minutes of the meeting of the Council held on 13th October 2016 be approved.

62\16

ANNOUNCEMENTS FROM THE VICE-CHAIRMAN

The Vice – Chairman of the Council announced that on 26th November he would be attending the Rubery Christmas Lights Switch on event and on 14th December he would be attending the Carol Service at St John's Church. All members were invited to attend these events.

63\16

ANNOUNCEMENTS FROM THE LEADER

The Leader made the following announcements:

A letter had been received from Marcus Jones MP Minister for Communities and Local Government which formally confirmed the Government's multi year settlement offer which would cover the years 2016/17 to 2019/20. This followed the submission of this Council's Efficiency Plan. The letter expressed the view that this was a first step towards Local Government becoming financially self sufficient.

Two Emails had been received from the Redditch and Bromsgrove Clinical Commissioning Group (CCG). The first related to a proposed transfer of stroke beds from the Princess of Wales Community Hospital to Evesham from early 2017. There had been no consultation regarding this but it was claimed it was necessary for reasons of clinical safety. A joint letter expressing concerns including increased travel time for residents of Bromsgrove and Redditch was to be sent in conjunction with the Leader of Redditch Borough Council.

The second Email related to the financial challenge facing the Redditch and Bromsgrove Clinical Commissioning Group. It was unlikely that the CCG would be able to deliver the savings requirement in 2016/17. The CCG had an unmitigated financial risk of £8.7m and was not expecting to be able to meet the required 1% surplus mandated by NHS England. The Email set out the actions to be taken by the CCG, including a detailed Financial Recovery Plan to address the deteriorating financial position.

A number of Members expressed concerns regarding the RBCCG position. It was noted that Hagley and Alvechurch Wards were covered by other CCGs and no information was available. Councillor K. J. May confirmed that she would be attending a meeting with the Chief Officer of RBCCG on 1st December and would raise the concerns of Members.

The Leader also gave an update on the work undertaken in conjunction with Worcestershire County Council on the traffic and highways situation

in the District. Consultant Highways Engineers, Mott McDonald had been appointed to undertake various tasks including assessment of the reliability of the Barham Traffic Model now used by the County Council when assessing Planning applications.

Councillor L. C. R. Mallett queried details of the work being carried out by Mott McDonald as he was aware that other similar reviews were being undertaken and it was important that work was not unnecessarily duplicated. Councillor C. B. Taylor confirmed that Mott McDonald were taking a “holistic approach” to examining the validity of the Barham model and would be consulting widely across the spectrum and not solely with applicants. No major Planning Applications would be considered by the Planning Committee until all issues had been addressed.

Councillor Mallett asked for details of progress on the heating works in the Parkside Suite. The Leader confirmed that the works would be taking place in January and February 2017 so they would not affect Christmas bookings.

64\16

COMMENTS, QUESTIONS OR PETITIONS FROM MEMBERS OF THE PUBLIC

There were no public comments, questions or petitions on this occasion.

65\16

RECOMMENDATIONS FROM THE CABINET - 2ND NOVEMBER 2016

Worcestershire Regulatory Services Board – Enforcement Policy

The recommendation from Cabinet was proposed by Councillor G. N. Denaro and seconded by Councillor P. J. Whittaker.

RESOLVED that subject to the minor amendment detailed in WRS minute 15/16, the Worcestershire Regulatory Services Enforcement Policy be adopted.

Medium Term Financial Plan 2017/18 – 2020/21 – Budget Assumptions

The recommendation from Cabinet was proposed by Councillor G. N. Denaro and seconded by Councillor C. B. Taylor.

In proposing the recommendation Councillor Denaro referred to the proposed budget parameters which were set out on page 69 of the agenda pack and which would be incorporated into the budget process.

During the discussion there was mention of the lack of reference to the Council's Efficiency Plan within the report. There was some concern expressed regarding the proposal to set price inflation at 0% in view of the current economic climate and Members also wished to see a Capital Review undertaken as soon as possible.

As an amendment it was proposed by Councillor C. A. Hotham and seconded by Councillor S. R. Colella that the recommendation from the Cabinet also include a requirement that the Medium Term Financial Plan be extended to cover the next four years. The amendment was accepted by the proposer and seconder.

RESOLVED

- (a) that the revenue assumptions as detailed in paragraph 3.4 of the Cabinet report (relating to increase in Council tax; pay award; funding the pension liability; price inflation; utilities inflation and discretionary fees and charges) be incorporated into the budget setting process; and
- (b) that the Medium Term Financial Plan be set for a four year period up to the financial year 2020/2021.

Council Tax Support Scheme 2017/2018

The recommendations from Cabinet were proposed by Councillor G. N. Denaro and seconded by Councillor C. B. Taylor.

In proposing the recommendations Councillor Denaro referred to the intention to simplify the administrative process in respect of the Council Tax Support Scheme (CTSS). The proposed changes would not impact on current claims but on new claims and on re-assessed claims. The Scheme was locally funded and it was important that the scheme was kept in line with the Housing Benefit Scheme in order to simplify the administration and enable claims to be dealt with in tandem. Officers would continue to work with residents suffering hardship to provide additional support and financial advice. The simplification of the consultation process would still enable the public and partner organisations to give their views and would enable the Authority to react more easily to changes in Government guidance.

Some Members were concerned that the Scheme was not helping those in the most need. There was some concern that the impact of the changes on Benefit claimants could not at present be analysed accurately. It was also queried whether a hardship fund of £25,000 was sufficient and whether there was enough flexibility in this.

Councillor Denaro recognised the limited information available at present, but stressed the changes would not impact on current claimants. It was anticipated that the new Benefits and Council Tax System would enable better feedback to be provided in future.

RESOLVED:

- (a) that the Council Tax Support Scheme be implemented as amended, namely :

- (i) that the backdating of Council Tax support be reduced in line with the changes in Housing Benefit announced by Central Government;
 - (ii) that claims be processed based on information provided by the Department of Work and Pensions without the need for further information;
 - (iii) the removal of the Family Premium on claims made from 1st April 2017 to bring Bromsgrove District Council's Council Tax Support Scheme in line with the changes in Housing Benefit announced by Central Government;
- (b) that future "uprating" of some of the figures be approved to take account of other national changes in benefits and allowances;
- (c) that authority be delegated to the Head of Customer Access and Financial Support to carry out statutory consultation on future draft CTSS in accordance with the legislative guidelines, in consultation with the Portfolio Holder; and
- (d) that the continuation of the Hardship Scheme be approved.

The Council Plan

The recommendation from Cabinet was proposed by Councillor G. N. Denaro and seconded by Councillor C. B. Taylor.

In proposing the recommendation Councillor Denaro referred to the unfavourable financial settlement received by the Authority and to the possibility that in 2019/20 there would be a "negative grant" payment to the Government of £750,000. In addition there was limited clarity at present regarding the Business Rates Localisation Framework.

Councillor Denaro stressed that the Council Plan had been developed on the basis of the requirement to understand what services residents need and want the Council to provide and that Economic Development and Income Generation were the prime drivers in order to achieve financial stability. It would be important to review all Council owned assets with a view to maximising income. If necessary land or other assets should be purchased to support Council priorities such as Business Units to enable local businesses to expand. In order to improve wages growth, it was important that Bromsgrove was not a dormitory town and that the Town Centre and other Local Centres across the District be supported. This was underway through the work of the Centres Manager.

Councillor Denaro reported that it was intended to retain the 6 Strategic Purposes as previously agreed but that their supporting aims had been reviewed to ensure they followed the new priorities. There would be a need for officers and Members to work as a team and reviews would be undertaken to revise priorities as work progressed.

Councillor Denaro referred to the following key areas which he was proposing would be areas for focus:

- Financial Stability;
- Economic Development
- Urban and Rural balance (particularly for housing needs);
- Delivery through Partnerships and Joint Ventures;
- Quality services for residents with affordable charges;
- Working with Worcestershire County Council to reduce congestion in the Town Centre and other Centres

Councillor Denaro acknowledged that the Council Plan could not cover every eventuality over the next 4 years, but would be a guide and would be updated as necessary. Some aspects would require a change in mind sets in order for the Authority to move forward.

During discussion on the recommendation some Members expressed views that the Council Plan document was at present confusing and imprecise. There was some concern that the priority areas which Councillor Denaro had raised did not feature significantly within the currently proposed Council Plan.

Councillor Denaro indicated whilst he supported the Plan he was in agreement with the inclusion of additional key areas and the amendment of the Plan to reflect these.

Arising from the debate it was generally agreed that consideration of the Council Plan be deferred to enable further consideration.

RESOLVED That consideration of the Council Plan be deferred.

ICT Infrastructure Resource

The recommendation from Cabinet was proposed by Councillor G. N. Denaro and seconded by Councillor C. B. Taylor.

In proposing the recommendation Councillor Denaro made a slight amendment to clarify that any decision to award a contract would be considered by both Cabinet and Council.

RESOLVED:

- (a) that authority be delegated to the Head of transformation and organisational Development to undertake a tendering process to identify a potential supplier to undertake the ICT infrastructure functions; and
- (b) that a decision on any proposed contract be subject to a further report to Cabinet and Council containing details of the proposals and their impact on the service and budget.

Development Management Shared Services Business Case

The recommendation from Cabinet was proposed by Councillor C. B. Taylor and seconded by Councillor G. N. Denaro.

In proposing the recommendation Councillor Taylor drew attention to the Executive Summary within the Business Case. The proposal would consolidate existing working arrangements and had been recommended for approval by the Shared Services Board after detailed consideration. Councillor Taylor in particular referred to:

- the additional cost of £25,000 which would be more than offset by additional fees;
- that the costs would be split 67% BDC to 33% RBC to reflect the additional applications at BDC and each Council would keep their own fees;
- that there would be two managers;
- the reasons for the staffing costs increase which were set out on page 134 of the agenda pack

During the debate a number of concerns were raised including:

- the current proposal was that this Council would host the service and meet two thirds of the costs of it, but the majority of staff would be working from Redditch;
- it was difficult to make a true comparison of staff costs from the table on page 134 of the agenda as there was insufficient evidence included;
- each Council would have a manager with the main role of managing a Planning Committee but Bromsgrove would be paying two thirds of the cost and would be losing part of their existing staff resource;
- it was suggested that the existing informal shared service arrangements had not proved to be wholly successful;
- there was an inconsistency between the costs shown within the Business Case and the Council Plan;
- costs of redundancy were queried together with the pension scheme liability.

Councillor Taylor referred to the improvements in working practices which had resulted in reductions in the time taken in dealing with applications. Efficiencies had been achieved through working as a shared service. The main thrust of the proposal was not just about finances but also involved being able to deal efficiently with larger applications which would involve both managers.

Some Members were concerned that there was a lack of clarity regarding in particular the true costs of the proposals and the cost around the TUPE transfer of staff.

With the agreement of the Chairman the meeting was adjourned from 8.20pm to 8.40pm to enable discussions to take place.

Following the resumption of the meeting it was proposed by Councillor L. C. R. Mallett and seconded by Councillor M. Thompson and

RESOLVED that the item be deferred to enable cross party discussions to be held on financial risk and cost apportionment.

66\16 **MINUTES OF THE MEETINGS OF THE CABINET HELD ON 5TH OCTOBER 2016, 13TH OCTOBER 2016 AND 2ND NOVEMBER 2016**

The minutes of the meetings of the Cabinet held on 5th October 2016, 13th October 2016 and 2nd November 2016 were received for information.

67\16 **REPORT FROM THE PORTFOLIO HOLDER FOR ENVIRONMENTAL SERVICES, REGULATORY SERVICES AND COMMUNITY SAFETY**

It was agreed that consideration of this item be deferred until the following Council meeting as the Portfolio Holder, Councillor R. D. Smith was unable to speak.

It was confirmed that the report would be amended to include the new WRS Enforcement Policy. It was also agreed there would be information relating to the maintenance and repair of playgrounds.

68\16 **MEMBERSHIP OF COMMITTEES**

RESOLVED that the appointment of Councillor J. M. L. A. Griffiths to the Licensing Committee in place of the late Councillor P. Lammas be noted.

69\16 **QUESTIONS ON NOTICE**

Question submitted by Councillor C. M. McDonald

“Why has Bromsgrove District Council sat back and allowed an unlicensed tip to develop on the Rose and Crown car park in Rubery: has it learned nothing from what happened at the Marlbrook Tip?”

Councillor C. B. Taylor responded that the site was under investigation by a Planning Services Case Officer and that Councillor McDonald had been contacted regarding this. The matter had been reported on 20th October and would be addressed fully when all the facts were known.

Councillor McDonald referred to an earlier reporting of the matter in August 2016.

Question submitted by Councillor M. Thompson

“Can the Leader give an update on the potential and long overdue agreement with BAM regarding the demolition of the Town’s sports hall?”

Councillor P. J. Whittaker responded that Councillor Thompson appeared to be under a misapprehension that BAM were connected to the demolition of the sports hall.

Councillor Whittaker reported that the agreement with BAM regarding access to the sports hall and gym at North Bromsgrove High School was nearing completion. The last meeting had taken place the previous week and the legal section was now finalising the agreement for signature. This however was nothing to do with the demolition of the sports hall.

Councillor Thompson stated that he was fully aware that the two issues were unconnected.

Question submitted by Councillor P. M. McDonald

“Would the Chairman please inform me how much monies has been paid to employees while on suspension over the last two years (April 2014-16)?”

Councillor G. N. Denaro responded that the sum was £7,093.

70\16

NOTICE OF MOTION - NEW HACKNEY CABS

Members considered the following notice of motion submitted by Councillor C. M. McDonald:

“That this Council takes positive action in adopting a policy that ensures all new Hackney Cabs will be wheelchair accessible vehicles.”

The motion was proposed by Councillor C. M. McDonald and seconded by Councillor S. P. Shannon.

In moving the motion Councillor McDonald referred to the difficulties those people using wheelchairs experienced when trying to travel. Many authorities had already implemented this requirement for new Hackney Carriages and in her opinion there was no reason why this Council could not do the same. It was important in furthering the wellbeing of residents.

Councillor Shannon supported the motion and referred to passengers using the new Railway Station in Bromsgrove which was accessible but then being unable to complete their journeys due to inaccessible Hackney Carriages.

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Councillor R. L. Dent indicated she was aware of the potential benefits of such a policy but stated that there was a report due to be considered at Licensing Committee on this matter in March 2017 and it would be more appropriate to await that report and to allow Licensing Committee to consider the matter in the light of the information contained in the report. This approach had been agreed at the recent meeting of the Committee.

A number of Members felt that there was insufficient evidence at present to make a decision on the motion and that there was a process in place which would allow for a decision to be made in March 2017.

Some Members felt it was important to support the motion and to begin the process of requiring Hackney Carriages to be wheelchair accessible. It was recognised this would only be in new vehicles and so would take some time to come fully into force. It was stated there had already been some delay in bringing the report forward to the Licensing Committee.

As an amendment it was proposed by Councillor K. J. May and seconded by Councillor G. N. Denaro that the Council reviews the policy on wheelchair accessible vehicles in the light of the Licensing Committee debate in March 2017. In accordance with Council Procedure Rule 18.3 a recorded vote was taken on the amendment and voting was as follows:

For the amendment: Councillors S. J. Baxter, S. R. Colella, B. T. Cooper, R. J. Deeming, G. N. Denaro, R. L. Dent, J. M. L. A. Griffiths, C. A. Hotham, R. E. Jenkins, R. J. Laight, K. J. May, S. R. Peters, M. A. Sherrey, R. D. Smith, C. J. Spencer, C. B. Taylor, P. L. Thomas, L. J. Turner, S. A. Webb and P. J. Whittaker (20).

Against the amendment: Councillors C. J. Bloore, M. T. Buxton, L. C. R. Mallett, C. M. McDonald, P. M. McDonald, S. P. Shannon and M. Thompson (7).

On being put to the vote the amendment was declared to be carried.

As a further amendment it was proposed by Councillor C. Bloore, seconded by Councillor C. McDonald, that the Licensing Committee meets within 8 weeks to consider the matter. In accordance with Council Procedure Rule 18.3 a recorded vote was taken on the amendment and voting was as follows:

For the amendment: Councillors S. J. Baxter, C. J. Bloore, M. T. Buxton, S. R. Colella, C. A. Hotham, R. E. Jenkins, L. C. R. Mallett, C. M. McDonald, P. M. McDonald, S. R. Peters, S. P. Shannon, M. Thompson and L. J. Turner (13);

Against the amendment: Councillors B. T. Cooper, R. J. Deeming, G. N. Denaro, R. L. Dent, J. M. L. A. Griffiths, R. J. Laight, K. J. May, R. D. Smith, C. J. Spencer, C. B. Taylor, P. L. Thomas, S. A. Webb and P. J. Whittaker (13);

Abstention: Councillor M. A. Sherrey (1)

The Chairman exercised his casting vote against the amendment and it was therefore declared lost.

Councillor P. M. McDonald proposed a further amendment, seconded by Councillor M. Thompson, that the Licensing Committee meets within 8 weeks and 1 day to consider the matter.

The meeting was adjourned between 9.33 and 9.54pm to enable discussion of the amendment.

Following the restart of the meeting, the amendment was put to the vote and declared lost.

A further amendment was proposed by Councillor L.C. M. Mallett, seconded by Councillor M. Thompson, that the Licensing Committee meets within 8 weeks and 3 days.

On being put to the vote the amendment was declared carried.

On being put to the vote the substantive motion was declared carried in the following terms:

That the Council reviews its policy for wheelchair accessible vehicles in light of the Licensing Committee's deliberations, the meeting of the Committee to be held within 8 weeks and 3 days.

71\16

URGENT ITEM - CONSULTATION ON TIMETABLE CHANGES

The Chairman agreed to consideration of this item as urgent on the basis that the consultation closed before the next meeting of the Council.

Councillor C. J. Spencer declared an Other interest in this item as a member of the Bromsgrove Rail User Group.

Councillors L.C.M Mallett and S. P Shannon referred to a letter from the Bromsgrove Rail Users Group outlining concerns about proposed changes to the timetable for Cross Country Trains. A copy was circulated to Councillors for their information.

The Council noted that the proposed changes to the timetable would reduce the number of Cross Country trains calling at Bromsgrove station with effect from December 2017. It was suggested that the proposals would adversely affect residents, particularly those using the service to travel to destinations the south of the town.

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Councillors unanimously agreed that the Chief Executive should write to Cross Country trains expressing the Council's concerns at the proposals.

RESOLVED:

That the Chief Executive respond to the consultation on timetable changes for Cross Country train services, expressing concerns on behalf of the Council.

The meeting closed at 10.15 p.m.

Chairman

CABINET

RECOMMENDATIONS TO THE COUNCIL

7TH DECEMBER 2016

1. REPORT OF THE NEW HOMES COMMUNITY GRANTS PANEL

The Cabinet has considered the report of the New Homes Community Grants Panel following a second round of bids being opened up on 26th September 2016.

Whilst the Cabinet resolved a number of matters relating to the grants to be allocated to various organisations, the following matter relating to the carry forward of the remaining balance was a recommendation to Council.

It is RECOMMENDED

That the remaining balance of £27,157, which equates to the balance of the funds unallocated in 2016/17 be carried forward to 2017/18 as an earmarked reserve.

2. REVIEW OF THE CAR PARKING ORDER

The Cabinet has considered a report on amendments required to update the Bromsgrove Car Parking Order which were required to rationalise the Order due to changes to car parks in Bromsgrove Town Centre and following the opening of the new Bromsgrove Station.

Whilst the Cabinet resolved to make the changes to the Order, the following matter, relating to a revised schedule of fees and charges for parking, was a recommendation to Council.

It is RECOMMENDED

That the revised schedule of fees and charges for parking (as attached at appendix 2 to the report) be approved and that the revised fees come into effect from the date of adoption of the new Car Parking Order.

3. FEES AND CHARGES 2017/18

The Cabinet has considered a report on proposed fees and charges to be levied on services provided by the Council and used as the basis for income targets in the Medium Term Financial Plan 2017/18 – 2020/21.

The fees and charges contained in Appendix 1 which were proposed to be increased above 3% was a recommendation to Council.

It is RECOMMENDED:

That the fees and charges contained in Appendix 1 which are proposed to be increased over the currently agreed budget assumption of 3% be approved.

4. BUSINESS WASTE RECYCLING SERVICE

The Cabinet has considered a report on proposals to introduce a recycling service for Business Waste customers on a phased basis from 2017/18.

It is RECOMMENDED

- (a) that a phase 1 Business Waste Recycling Service be introduced in 2017/18;
- (b) that the service be extended and rolled out to all customers from 2018/19;
- (c) that the fees and charges as set out in appendix 2 to the report be approved and adopted; and
- (d) that delegated authority be given to the Head of Environmental Services to have discretion to vary the charges for the Business Waste Recycling Collection Service when agreeing terms with customers within a variance of plus or minus 25 %.

(The report and Business Case in respect of this recommendation are Exempt and are included on “pink” paper at the back of the Council agenda. If Members wish to refer/comment in detail on the report and Business Case it will be necessary to consider the Exclusion of the Public from the meeting)

11TH JANUARY 2017

1. BROMSGROVE DISTRICT PLAN 2011- 2030 ADOPTION

The Cabinet has considered a report on the adoption of the Bromsgrove District Plan 2011-2030

It is RECOMMENDED:

- (a) that the content of the Bromsgrove District Plan Planning Inspectorate’s Report (Appendix 1) and the associated Schedule of Main Modifications (Appendix 2) be noted;
- (b) that the Bromsgrove District Plan 2011-2030 as submitted and subsequently amended by the modifications set out in Appendix 2 and Appendix 3 to the report be approved;
- (c) that the Policies Map which accompanied the submission version of the Bromsgrove District Plan and remains unchanged as a result of the examination process be approved;
- (d) that the Bromsgrove District Plan Adoption Statement and Strategic Environmental Assessment and Sustainability Appraisal Adoption Statement which form Appendix 4 and 5 of the report be noted; and

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- (e) that authority be delegated to the Head of Planning and Regeneration to undertake further minor editorial changes deemed necessary in preparing the adopted District Plan for publication, following consultation with the Portfolio Holder for Planning.

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE CABINET

7TH DECEMBER 2016 AT 6.00 P.M.

PRESENT: Councillors G. N. Denaro (Leader), K.J. May (Deputy Leader),
C. B. Taylor, R. D. Smith and P. J. Whittaker

Observers: Councillors S. J. Baxter, C. A. Hotham and L.C.R. Mallett

Officers: Mr K. Dicks, Ms S. Hanley, Ms J. Pickering, Mr J. Godwin, Mr G.
Revans, Mr I. Roberts, Mr K. Hirons, Mrs S. Sellers and Ms R. Cole

52/16 **APOLOGIES FOR ABSENCE**

There were no apologies for absence.

53/16 **DECLARATIONS OF INTEREST**

There were no declarations of interest at this stage.

54/16 **MINUTES**

The minutes of the meeting of the Cabinet held on 2nd November 2016
were submitted.

RESOLVED that the minutes of the meeting of the Cabinet held on 2nd
November 2016 be approved as a correct record.

55/16 **OVERVIEW AND SCRUTINY BOARD**

The minutes of the meetings of the Overview and Scrutiny Board held on
31st October 2016 and 28th November 2016 were submitted.

It was noted that at Minute 59/16 there were additional
recommendations arising from the Preventing Homelessness Task
Group report. The recommendations from the Finance and Budget
Working Group were considered under the relevant agenda item.

RESOLVED:

- (a) that the minutes of the Overview and Scrutiny Board held on 31st
October 2016 be noted;
- (b) that the recommendations of the Overview and Scrutiny Board on
28th November 2016 in Minute 59/16 as set out below be
approved:

- (i) that the £15,000 referred to in the preventing Homelessness Task Group's fourth recommendation be allocated to St Basil's to support their ability to continue to provide services in the District in 2017/18;
 - (ii) that support for housing services for young people at risk of homelessness should be added as an unavoidable pressure for the Council; and
 - (iii) that the Leader of the Council write to Worcestershire County Council to express concerns about the impact of the County Council's funding decisions at a local level, including on Bromsgrove District Council.
- (c) that the remainder of the minutes of the meeting of the Overview and Scrutiny Board held on 28th November 2016 be noted.

56/16

REPRESENTATION ON OUTSIDE BODIES

RESOLVED that the changes of the substitute Member on the Greater Birmingham and Solihull LEP and the Representative on the Worcestershire LEP Local Transport Body, from Councillor T. Onslow to Councillor I. Hardiman be noted.

57/16

REPORT OF THE NEW HOMES BONUS COMMUNITY GRANTS PANEL

(Councillor P. J. Whittaker declared an other disclosable interest in respect of this item as he had supported a number of the applications for NHB funding as Ward Councillor)

The Cabinet considered the report of the New Homes Bonus Community Grants Panel following a second round of bids being opened up on 26th September 2016.

At the invitation of the Leader, Councillor S. J. Baxter who had chaired the meeting of the Panel on 16th November introduced the report and gave additional background information to some of the recommendations.

In particular the reasons around the proposal to return the funds allocated to Hagley Tennis Club in 2015/16 to the brought forward funds given the particular circumstances which had arisen. It was noted that it would be possible for a further application to be made on behalf of the Club in future as the situation changed.

In relation to recommendation 2.2 relating to Application 8 the Head of Leisure and Cultural Services reported that there was not an outstanding Health and Safety issue and that necessary works would be addressed within existing budgets.

Members were concerned that some applications were for relatively small amounts of money and it was suggested that in some instances,

applications could have been made to the appropriate County Councillor to be met from their Divisional Funds.

It was recognised that the Scheme had proved to be time consuming to apply for and to administer and that the process was to be reconsidered for future years. Councillor Baxter and the Cabinet expressed thanks to officers and in particular the Democratic Services Officer involved for the work undertaken in administering the process.

RESOLVED:

- (a) that the funds allocated to Hagley Tennis Club in 2015/16 be returned to the brought forward funds, giving a total available for allocation in Round 2 of 327,324.
- (b) that the works referred to in Application 8 be addressed as necessary and that the funding be met from within existing budgets;
- (c) that grants, as detailed in the Summary of NHB Grants Panel recommendations attached at appendix 1 be approved;
- (d) that a full and detailed review of the NHB Community Grants Scheme including the administrative arrangements be undertaken prior to the commencement of the 2017/18 bidding process.

RECOMMENDED that the remaining balance of £27,157, which equates to the balance of the funds unallocated in 2016/17 be carried forward to 2017/18 as an earmarked reserve.

58/16

REPORT OF THE FINANCE AND BUDGET SCRUTINY WORKING GROUP

At the invitation of the Leader Councillor S. J. Baxter and (upon his later arrival) Councillor L. C. R. Mallett referred to the work undertaken to date by the cross party Finance and Budget Working Group.

It was noted that the Group was functioning effectively and that the new approach to the work around the Medium Term Financial Plan was working well. Councillor Mallett expressed his thanks to the Leader for his regular attendance at the meetings.

The recommendations from the Finance and Budget Working Group were considered.

RESOLVED

- (i) that the following recommendations be agreed:
 - (a) CMT to develop a set of principles around savings to be made;
 - (c) there should be one overall corporate training budget and HR to prioritise that budget to meet the needs of staff;
 - (d) the £11,000 in respect of Business Transformation, which was reserved for training be given up as a saving;

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- (e) the Council to have a robust four year funded Capital Programme for the period 2017/18 to 2020/21 to include estimates across each year of the budget;
 - (f) there should be an overall corporate budget for apprenticeships;
 - (g) that an exercise be carried out to ensure the Council makes the best use of its assets;
 - (h) that officers ensure that the Asset Register is kept up to date at all times;
 - (i) that a review of the Low Cost Housing Scheme be undertaken as soon as possible;
 - (j) that consideration be given to revising the pricing structure for the Recreation Road South Car Park, to blocks of hours and a day rate (already agreed);
 - (k) that virements between pay and general expenditure only be allowed with approval from the Cabinet.
- (ii) that in relation to recommendation (b) “the Leader should source, with immediate effect, the services of an external commercial organisation in order to review the management structure of the Council” it be noted that the Leader was in consultation with the Leader of Redditch Borough Council on this matter.
- (iii) that in relation to (l) “virements between income and expenditure only be allowed with approval from the Cabinet” it be noted that this was to be referred back to Corporate Management Team for consideration in the first instance.

The Leader confirmed that he would be reporting back to the Overview and Scrutiny Board on 19th December.

59/16

REVISED DEBT RECOVERY POLICY

The Cabinet considered a report on a proposed revised Debt Recovery Policy. It was reported that the Policy had been revised with the aim of balancing the needs of the Council to recover payment and supporting those who are struggling to pay.

In response to queries from Members the Executive Director Finance and Resources explained that it was intended to take a more “holistic” approach to debt collection which would mean that priority debts and those of greater value were recovered first.

RESOLVED that the revised Debt Recovery Policy be approved and adopted.

60/16

REVIEW OF CAR PARKING ORDER

The Cabinet considered a report on amendments required to update the Bromsgrove Car Parking Order.

It was noted that changes were required to rationalise the Order due to changes to car parks in Bromsgrove Town Centre and following the opening of the new Bromsgrove Station. It was anticipated that there would be minimal impact on car park revenue as a result of the changes.

The main changes proposed were:

- New Road car park and Parkside car park to be designated as long stay and the long staff tariff be applied;
- Stourbridge Road car park to be included in the general long stay permit of £320 p.a.;
- Dolphin Centre car park to be removed from the Car Park order;
- Former Bromsgrove Station car park to be re named “Aston Fields Car Park” and be available for 2 hours free of charge for shoppers;
- Recreation Road South car park tariff to be amended to allow a maximum stay of 14 hours with fee increments of 80 pence per hour up to a maximum cost of £11.20.

It was reported that there was an on going review of car parks as a whole in the light of developments and changes in economic strategy within the District to try to best meet the needs of residents and businesses.

It was noted that the changes in car park permits would be promoted with a view to increasing take up.

RESOLVED that the Bromsgrove District Council (Off-Street Parking Places) Order 2017 (as attached as appendix 1 to the report) be approved and that authority to implement the new parking order in accordance with the relevant legislation be delegated to the Head of Environment Services and the Head of Legal, Equalities and Democratic Services.

RECOMMENDED that the revised schedule of fees and charges for parking (as attached at appendix 2 to the report) be approved and that the revised fees come into effect from the date of adoption of the new Car Parking Order.

61/16

NOMINATION OF ASSET OF COMMUNITY VALUE - THE ROYAL OAK, CATSHILL

(It was noted that the report related solely to The Royal Oak, Catshill as the application in respect of the other premises was incomplete.)

The Cabinet considered a report on an Application to list The Royal Oak, Catshill as an Asset of Community Value (ACV).

Officers outlined the application received from CAMRA in respect of the Royal Oak public house. Reference was also made to the representations received from solicitors acting for Punch Taverns the owners of the premises objecting to the application.

Members considered the application on its merits and in the light of the test contained within Section 88 (1) of the Localism Act 2011, which was set out in paragraph 3.9 of the report.

Taking into account the information supplied by CAMRA within the application form, Members considered whether there was sufficient evidence to demonstrate that there was an identifiable local interest in the premises being nominated as an ACV. The limited amount of community use over and above what would normally be expected at a public house was taken into account.

Following consideration it was

RESOLVED that the application for listing of the Royal Oak, Catshill as an Asset of Community Value be not supported.

62/16

FEES AND CHARGES 2017/2018

Members considered a report on the proposed fees and charges to be levied on services provided by the Council, as used as the basis for income targets in the Medium Term Financial Plan 2017/18 – 2020/21.

It was noted that the majority of charges had been increased by 3%. In some instances such as the collection of bulky waste individual prices would need to be quoted to the customer but based on a scale of charges.

Following discussion it was

RESOLVED:

- (a) that the fees and charges contained within Appendix 1 which have no increase for 2017/18 be approved; and
- (b) that the fees and charges contained within Appendix 1 which have reduced for 2017/18 be approved.

RECOMMENDED that the fees and charges contained in Appendix 1 which are proposed to be increased over the currently agreed budget assumption of 3% be approved.

63/16

MEDIUM TERM FINANCIAL PLAN UPDATE

The Executive Director Finance and Resources gave a brief update with regard to the latest position on the Medium Term Financial Plan 2017/18 – 2020/21.

It was noted that final information on the settlement from Central Government was due to be received shortly. In addition, information on any changes to the New Homes Bonus scheme and the Business Rates arrangements was also still awaited.

Members were reminded that Efficiency Plan had been approved by the Government and that work to deliver this was on going. This included work being undertaken by the cross party Finance and Budget Working Group.

Heads of Service were continuing to look at pressures and identifying savings which would not impact on frontline delivery of services . In addition Heads of Service were looking for new ways of generating income apart from putting up charges for example this might include charging for new areas of service provision and alternative means of service delivery.

It was noted that the Capital Programme would be considered by Cabinet in January 2017. There would also be a budget report in January with the final decisions being made at Council on 28th February 2017.

RESOLVED that the latest position in respect of the Medium Term Financial Plan be noted.

64/16

FINANCE MONITORING REPORT - QUARTER 2 2016/17

Members considered a report on the Council's financial position for Revenue and Capital for the period April to September 2016. The Executive Director Finance and Resources reported that in future as a result of the new Collaborative Planning tool, financial monitoring information would be available in a more timely manner.

Following discussion it was

RESOLVED that the current financial position on Revenue and Capital as detailed in the report be noted.

65/16

LOCAL GOVERNMENT ACT 1972

That under Section 100 I of the Local Government Act 1972, as amended, the public be excluded from the meeting during the consideration of the item of business the subject of the following minute on the grounds that it involves the disclosure of "Exempt Information" as defined in Part 1 of Schedule 12A to the Act, the relevant part being as set out below and that it is in the public interest to do so.

Minute No
66 /16

Paragraph
3

66/16

BUSINESS WASTE RECYCLING SERVICE

The Cabinet considered a report on proposals to introduce a Recycling Service for Business Waste customers on a phased basis from 2017/18.

It was reported that the opportunity to provide a Recycling Service to Business waste customer had been identified by officers as an opportunity to develop the service provision and the available income stream and to provide a better service to customers.

The details within the report were noted including the benefits of reducing the amount of disposal of residual waste through the provision of an efficient Recycling waste service.

Members welcomed the report and thanked officers for the work they had undertaken in the development of the proposal to date.

RECOMMENDED:

- (a) that a phase 1 Business Waste Recycling Service be introduced in 2017/18;
- (b) that the service be extended and rolled out to all customers from 2018/19;
- (c) that the fees and charges as set out in appendix 2 to the report be approved and adopted; and
- (d) that delegated authority be given to the Head of Environmental Services to have discretion to vary the charges for the Business Waste Recycling Collection Service when agreeing terms with customers within a variance of plus or minus 25 %.

The meeting closed at 7.32 p.m.

Chairman

BROMSGROVE DISTRICT COUNCIL

MEETING OF THE CABINET

11TH JANUARY 2017 AT 6.00 P.M.

PRESENT: Councillors G. N. Denaro (Leader), C. B. Taylor, R. D. Smith and P. J. Whittaker

Observers: Councillors M. Glass and C. A. Hotham

Officers: Ms S. Hanley, Ms J. Pickering, Ms D. Poole, Ms R. Bamford, Mrs S. Sellers, Ms R. Talbot and Ms R. Cole

67/16 **APOLOGIES FOR ABSENCE**

An apology for absence was received from Councillor K. J. May.

68/16 **DECLARATIONS OF INTEREST**

There were no declarations of interest.

69/16 **MINUTES**

The minutes of the meeting of the Cabinet held on 7th December 2016 were submitted.

RESOLVED that the minutes of the meeting of the Cabinet held on 7th December 2016 be approved as a correct record.

70/16 **OVERVIEW AND SCRUTINY BOARD**

The minutes of the meeting of the Overview and Scrutiny Board held on 19th December 2016 were submitted.

RESOLVED that the minutes of the meeting of the Overview and Scrutiny Board held on 19th December 2016 be noted.

71/16 **BROMSGROVE DISTRICT PLAN 2011 - 2030 ADOPTION**

The Cabinet considered a report on the adoption of the Bromsgrove District Plan 2011 – 2030.

Members were reminded of the lengthy Local Plan process which had taken place over a number of years. This had included an Examination in Public which had closed with the issue of the Inspector's report on 16th December 2016. The Inspector's report recommended that subject

to the making of a series of modifications the Bromsgrove District Plan satisfied the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 and the criteria for soundness in the National Planning Policy Framework and was therefore sound.

Members referred to the importance of having a clear planning framework in place to deliver the vision and development for the future of the area encompassing housing (including affordable housing) and employment sites. It was recognised that without an adopted plan the District would be vulnerable to ad hoc planning applications and “planning by appeal”.

In addition it was acknowledged that the clarity of the planning framework set out in an adopted Plan would assist the Authority in working with government and other funding agencies to access infrastructure funding for example in respect of new transport infrastructure. An adopted Plan would also enable work to progress on the preparation of a Community Infrastructure Levy which would also enable required infrastructure to be provided.

It was recognised that any planning applications in respect of particular sites were a matter for the Planning Committee.

It was noted that any Cabinet recommendations would be considered by the Council at its meeting on 25th January 2017.

Members expressed thanks to Strategic Planning officers for their hard work on the Plan to date.

(Councillor P. J. Whittaker requested that it be recorded that he had abstained from voting on the matter as whilst he was broadly in agreement with the Plan he did not agree with the location of the proposed cross border housing growth.)

RECOMMENDED:

- (a) that the content of the Bromsgrove District Plan Planning Inspectorate’s Report (Appendix 1) and the associated Schedule of Main Modifications (Appendix 2) be noted;
- (b) that the Bromsgrove District Plan 2011-2030 as submitted and subsequently amended by the modifications set out in Appendix 2 and Appendix 3 to the report be approved;
- (c) that the Policies Map which accompanied the submission version of the Bromsgrove District Plan and remains unchanged as a result of the examination process be approved;
- (d) that the Bromsgrove District Plan Adoption Statement and Strategic Environmental Assessment and Sustainability Appraisal Adoption Statement which form Appendix 4 and 5 of the report be noted; and
- (e) that authority be delegated to the Head of Planning and Regeneration to undertake further minor editorial changes deemed necessary in preparing the adopted District Plan for

publication, following consultation with the Portfolio Holder for Planning.

72/16

STAFF SURVEY REPORT AND ACTIONS

The Cabinet considered a report on the Staff Survey which had recently been undertaken.

It was noted that the survey had highlighted areas for further work and also areas of good practice for the Authority to build on.

It was reported that in order to take forward the results of the survey a Programme Board had been established chaired by the Chief Executive and supported by the Head of Business Transformation and representatives from Human Resources, Organisational Development and Trade Unions.

Three corporate work streams had been established and these were being led by key officers

- People Management;
- Meeting our Customers' Needs;
- Organisational Culture

In addition all Heads of Service had analysed data from their own area and had developed Action Plans to specifically address the three areas of greatest improvement and decline compared to the previous survey, whilst also focusing on other areas which they felt needed addressing within their services. The Action Plans would be reviewed by Corporate Management Team on a regular basis.

Members queried the level of response to the survey which was 25% compared to the response to the previous survey undertaken in 2013 of 33%. It was recognised that whilst officers were satisfied that the response level was statistically valid, it was important to try to increase the response rate in future. In this regard the length of the survey and structure of the questions would be revised for future surveys.

Members recognised the importance of ensuring staff had the opportunity to undertake appropriate training to develop their skills and that any issues in relation to bullying and harassment were addressed effectively.

RESOLVED that the report on the Staff Survey results and the subsequent actions be noted.

73/16

MEDIUM TERM FINANCIAL PLAN AND CAPITAL PROGRAMME 2017/18 - 2020/21 UPDATES

The Executive Director Finance and Resources reminded Members that a full report on the Medium Term Financial Plan 2017/18 – 2020/21 would be submitted to the Cabinet at its meeting on 1st February 2017. The Cabinet would then make recommendations to the Council meeting on 28th February 2017. Work was also being undertaken by the Overview and Scrutiny Finance and Budget Working Group.

The Executive Director Finance and Resources gave a brief presentation on the potential impact of government proposals on the Council's Medium Term Financial Plan 2017/18 – 2020/21.

The following points were highlighted:

There was no further information as yet on the Localisation of Business Rates – it was hoped this would be clearer by June/July 2017;

- New Homes Bonus - there had been a number of changes to the legislation which overall would decrease the funding available to the Council significantly (potentially by around £2.8m over four years);
- Efficiency Plan – officers had been working to identify additional income/savings/growth and to map these to the Efficiency Plan; in addition aspirational income and savings continued to be developed through alternative models of service delivery;
- Commercialisation Forum – had taken place with all Heads of Service and Managers to consider ways of generating additional income and growth through services the Council could offer;
- Officers were working to ensure that any use of balances and reserves was minimised.

RESOLVED that the latest position in respect of the Medium Term Financial Plan be noted.

74/16

COUNCIL TAX BASE 2017/18

Members considered a report which contained details of the calculation of the District's Tax Base for Council Tax setting purposes for 2017/18.

RESOLVED that the amount calculated by Bromsgrove District Council as the Council Tax Base for the whole area for 2017/18 be approved at 36,056.65as detailed at Appendix 1 to include the individual Parish elements.

75/16

NOMINATION OF ASSET OF COMMUNITY VALUE - THE NEW INN, BOURNEATH

The Cabinet considered a report on an application to list The New Inn, Bournheath as an Asset of Community Value (ACV). A location plan for the premises was circulated.

Officers outlined the application received from CAMRA in respect of The New Inn, Bournheath. Attention was drawn to the application form and supporting information.

Comments had been received from the owners of the premises and these were set out in paragraph 3.6 of the report.

Members considered the application on its merits and in the light of the test contained within Section 88(1) of the Localism Act 2011, which was set out in paragraph 3.10 of the report.

Taking into account the information supplied by CAMRA within the application form, Members considered whether there was sufficient evidence to demonstrate that the premises should be nominated as an ACV. Members particularly noted the limited amount of community use over and above what would normally be expected at a public house.

Following consideration it was

RESOLVED that the application for listing of the New Inn, Bournheath as an Asset of Community Value be not supported.

76/16

NOMINATION OF ASSET OF COMMUNITY VALUE - HANBURY TURN, STOKE HEATH

The Cabinet considered a report on an Application to list The Hanbury Turn, Stoke Heath as an Asset of Community Value (ACV).

Officers outlined details of the application received from CAMRA in respect of the Hanbury Turn public house, Stoke Heath. Reference was also made to the representations received from received from Solicitors acting for the owners of the premises objecting to the application.

Members considered the application on its merits and in the light of the test contained within Section 88(1) of the Localism Act 2011 which was set out in paragraph 3.9 of the report.

Taking into account the information supplied by CAMRA within the application form, Members considered whether there was sufficient evidence to demonstrate that the premises should be nominated as an ACV. The limited amount of community use over and above what would normally be expected at a public house was taken into account.

Following consideration it was

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RESOLVED that the application for listing of the Hanbury Turn, Stoke Heath as an Asset of Community Value be not supported.

(Councillor C. B. Taylor asked that it be noted that his home address was in the vicinity of the premises)

The meeting closed at 7.05 p.m.

Chairman

Council Tax Base Calculation 2017-18

The Council Tax Base calculation for each parish is detailed below

	<u>Gross</u>	<u>Net</u>
	36,420.86	36,056.65
101/107 Unparished	13,604.89	13,468.84
111 Alvechurch	2,327.39	2,304.12
102 Barnt Green	1,008.62	998.54
116 Belbroughton	1,212.09	1,199.97
118 Bentley Pauncefort	188.17	186.28
119 Beoley	458.58	454.00
103 Bournheath	219.79	217.59
104 Catshill & Marlbrook	2,361.75	2,338.14
120 Clent	544.21	538.77
121 Cofton Hackett	988.42	978.54
122 Dodford with Grafton	401.36	397.35
105 Finstall	308.02	304.94
123 Frankley	51.50	50.98
124 Hagley	2,930.61	2,901.30
106 Lickey & Blackwell	2,113.11	2,091.98
125 Hunnington	236.38	234.01
126 Romsley	663.50	656.86
127/131 Parish of Stoke	1,717.17	1,700.00
129 Tutnall	366.83	363.16
130 Wythall	4,718.47	4,671.28
	36,420.86	36,056.65

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MEMBERS ALLOWANCES – INDEPENDENT REMUNERATION PANEL REPORT AND RECOMMENDATIONS

Relevant Portfolio Holder	Cllr Denaro
Portfolio Holder Consulted	Yes
Relevant Head of Service	Claire Felton, Head of Legal, Equalities and Democratic Services
Ward(s) Affected	All
Ward Councillor(s) Consulted	N/A

1. SUMMARY OF PROPOSALS

- 1.1 This report asks the Council to consider the report and recommendations of the Independent Remuneration Panel (IRP); to decide whether or not to accept the IRP's report and to agree the Members Allowances scheme for 2017-18 arising from this.

2. RECOMMENDATIONS

The Council is asked to RESOLVE

- 2.1 whether or not to accept all, some, or none of the recommendations of the Independent Remuneration Panel for 2017-18;
- 2.2 having considered the Panel's report and recommendations, whether the Council changes the scheme of allowances for Members for 2017-18.

3. KEY ISSUES

Financial Implications

- 3.1 If changes to the current amounts of allowances are made there may be additional savings or costs. If the Council implements the recommendations of the IRP – a very slight reduction in the basic allowance and some changes to multipliers of the Basic Allowance used for Special Responsibility Allowances – it would incur additional costs of approx. £1,000 per year against estimated full year current payments for basic and special responsibility allowances. Service savings would have to be made to fund this additional cost.

Legal Implications

- 3.3 The Council is required to maintain a Panel of people from outside the Council to consider and recommend to it:
- the level of basic and special responsibility allowances paid to Councillors and
 - travel, subsistence and dependent carers' expenses for Councillors.

The Council is required to “have regard” to the recommendations of the Panel. However, it is not obliged to agree to them. It can choose to implement them in full or in part, or not to accept them.

- 3.4 If the Council wishes to change its scheme of allowances for Councillors it should do so prior to the start of the new financial year, having had regard to recommendations made by the Panel. If changes to the amounts of the allowances are agreed by the Council, then the scheme will be updated automatically.

Service / Operational Implications

- 3.5 The current allowances paid by the authority are shown in appendix 1 to the IRP’s report, together with the allowances recommended by the Panel.
- 3.6 The Council is deciding on the level of allowances payable to members from 1st April 2017.

Customer / Equalities and Diversity Implications

- 3.7 There are no specific customer or equalities implications arising from this report.

4. RISK MANAGEMENT

- 4.1 Payments to Councillors can be a high profile issue. The main risks are reputational. However, the Council is transparent about the decisions made on allowances. The Allowances scheme and sums paid to Councillors each year are published on the Council’s website.

5. APPENDICES

Report of the Independent Remuneration Panel for 2017-18.

6. BACKGROUND PAPERS

None.

7. KEY

IRP – Independent Remuneration Panel

AUTHOR OF REPORT

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**Independent Remuneration Panel
For Worcestershire District Councils**

Annual Report and Recommendations for 2017-18

Bromsgrove District Council

December 2016

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Recommendations

The Independent Remuneration Panel recommends to Bromsgrove District Council the following:

1. That the Basic Allowance for 2017-18 is £4,300, which represents just over 1% increase on last year's recommendation.
2. That the Special Responsibility Allowances are as set out in Appendix 1.
3. That travel allowances for 2017-18 continue to be paid in accordance with the HMRC mileage allowance.
4. That subsistence allowances for 2017-18 remain unchanged.
5. That the Dependent Carer's Allowance remains unchanged.
6. That for Parish Councils in the District:
 - (a) parish basic allowance should not be paid to every member of a Parish Council;
 - (b) parish basic allowance should only be payable to the Chairman of a Parish Council with a precept of £15,000 or above, and that the amount of such allowance should be maintained at 11% (to the nearest round figure) of the basic allowance payable to Bromsgrove District Councillors;
 - (c) parish basic allowance should be paid to eligible Chairmen in preference to the 'historic' Chairman's Allowance and that a Chairman should not receive both payments*;
 - (d) the Panel will only undertake any further reviews on this matter in response to specific requests from Parish Councils or changes in legislation;
 - (e) Where paid, travelling allowances should be paid in accordance with the HM Revenue and Custom mileage allowance.

** 'historic' Chairman's Allowance is that payable under Section 15 (5) of the Local Government Act 1972 to meet the expenses of this position.*

Introduction

The Independent Remuneration Panel (IRP) has been appointed by the Council to carry out reviews of the allowances paid to Councillors, as required by the Local Government Act 2000 and subsequent legislation. The Panel has carried out its work in accordance with the legislation and statutory guidance.

The law requires each Council to “have regard” to the recommendations of the Independent Panel. We noted that last year the Council did not accept our recommendations and retained a basic allowance at £4,326..

This year members of the Panel met the Leader of the Council, who had taken up the role since we last reported, to discuss the methodology used by the Panel in making its recommendations. In particular we discussed the Special Responsibility allowances for portfolio holders and Committee Chairmen. The Leader did not ask the Panel to carry out any specific research or reviews at this time.

At this point we would like to stress that our recommendations are based on thorough research and benchmarking. We have presented the Council with what we consider to be an appropriate set of allowances to reflect the roles carried out by the Councillors. The purpose of allowances is to enable people from all walks of life to become involved in local politics if they choose.

Background Evidence and Research Undertaken

There is a rich and varied choice of market indicators on pay which can be used for comparison purposes. These include:

- National survey data on a national, regional or local level;
- Focussed surveys on a particular public sector;
- Regular or specific surveys
- Use of specific indices to indicate movement in rewards or cost of living.

As background for the decisions taken by the Panel this year we have:

- Analysed and considered the Annual Survey of Hours and Earnings (ASHE) statistics for 2016 which gives the mean hourly wage rate for all Worcestershire employees (by residence) at £14.95.
- Benchmarked the Basic and Special Responsibility Allowances against allowances for comparable roles paid by the Chartered Institute of Public Finance and Accountancy (CIPFA) “Nearest Neighbour” Councils for each Authority (25 in total across all the Authorities to whom we report).
- Undertaken a detailed and thorough study of the Basic and Special Responsibility Allowances paid to Councillors in the 25 Authorities using 2016 “Nearest Neighbour” comparison data, assessing in particular the SRAs paid to the Chairman of a) Planning and b) Overview and Scrutiny.

We give more details about these areas of research at the end of the report.

In 2015, Worcester City Councillors recorded time spent on Council business for a number of weeks. This enabled the Panel to confirm the number of hours per week for front line Councillors, which is used to calculate the recommended basic allowance. More detail is given about this under the Basic Allowance heading later in the Report.

The figure being recommended by the Panel of £4,300 for the Basic Allowance appears reasonable and appropriate when compared to other Local Authorities.

Arising from our research, in Table 1 we have included information showing the Members' allowances budget for Basic and Special Responsibility Allowances paid for 2015-16 as a cost per head of population for each Council. To give context, we have included details of the proportion of net revenue budget spent by each Council on Basic and Special Responsibility allowances.

In Table 2 we show the average payment per member of each Authority of the Basic and Special Responsibility Allowances, which illustrates the balance between the level of Special Responsibility Allowances paid and the Basic Allowance. The allowances used were those paid by each Authority in the financial year 2015-16.

Table 3 shows the cost per head of population of each Council's Basic Allowances using 2014-15 allowance figures and the population figures for mid-year 2014. This summarises a piece of work undertaken by a member of our Panel and given as further comparative evidence for information.

Table 1 - Total spend on Basic and Special Responsibility Allowances as a cost per head of population 2015-16 figures

Authority, population¹ and number of Councillors	Total spend Basic Allowances 2015-16 £:	Total spend on Special Responsibility Allowances (SRA) £:	SRA as a percentage of total Basic Allowance %:	Cost of total basic and SRA per head of population £:	Total of basic and SRA as a percentage of Net General Revenue Fund expenditure %
Bromsgrove DC (31) 95,800	138,747	60,632	43.70	2.08	1.65%
Malvern Hills DC (38) 75,700	158,829	59,888	38%	2.89	2.7%
Redditch Borough (29) 84,700	96,970	38,905	40%	1.61	1.31%
Worcester City (35) 101,300	142,100	60,004	42.23%	1.995	1.903%
Wychavon (45) 121,500	187,261	69,554	37.14%	2.11	1.81%

Table 2 showing average allowance per Member of each Authority (Basic and Special Responsibility Allowances, 2015 – 16 figures)

Authority (number of Councillors)	Amount £
Bromsgrove District (31)	6,432
Malvern Hills District (38)	5,756
Redditch Borough (29)	4,685
Worcester City (35)	5,772
Wychavon District (45)	5,707

¹ ONS population figures mid 2015. Totals for Basic and Special Responsibility allowances paid are as published by each Authority for the 2015-16 financial year.

Table 3 A member of the Panel also calculated the cost per head of population of each Council's basic allowances. These are (2014-15 figures):

Authority	Basic allowance	Basic allowance per Head of population £pa
Bromsgrove	4,326	1.46
Malvern Hills	4,200	2.14
Redditch Borough	3,350	1.15
Worcester City	4,200	1.49
Wychavon	4,250	1.63
Average from survey of 25 Councils	4,962	2.12

This shows that the level of Basic Allowance paid by the District Councils, and recommended by the Panel, is below the average for the 25 "Nearest Neighbour" Councils surveyed.

Basic Allowance 2017 - 18

Calculation of Basic Allowance

The Basic Allowance is based on:

- The roles and responsibilities of Members; and
- Their time commitments – including the total average number of hours worked per week on Council business.

We then apply a public service discount of 40% to reflect that Councillors volunteer some of their time to the role.

For the recommendations this year the calculation used the "Mean" (average) Worcestershire hourly earnings 2016 from the Office for National Statistics of £14.95. This represented an increase over the 2015 figure of 1.8% and a basic allowance of £4,381. However, in view of the financial situation facing local government at the moment and the likelihood that any pay increase for employees will not exceed 1%, the Panel is recommending a basic allowance of £4,300 for 2017-18.

The Basic Allowance is paid to all Members of the Council.

Whilst each Council may set out role descriptions for Councillors, the Panel accepts that each Councillor will carry out that role differently, reflecting personal circumstances and local requirements. However, we consider the Basic Allowance to include Councillors' roles in Overview and Scrutiny, as any non-Executive member of the Council is able to contribute to this aspect of the Council's work. It is for this reason that we do not recommend any Special Responsibility Allowance for members of the Overview and Scrutiny Committee. We also

consider that ICT could be included in the Basic allowance as it is generally more readily available to individuals than in previous years. However, we are comfortable that specific local decisions may be made about how ICT support is provided.

As mentioned earlier, in 2015 Worcester City Councillors recorded the time spent per week on Council business for a number of weeks during the early autumn. This was considered to reflect an appropriate “average” period of time for meetings and other commitments. The results from this survey showed that the average input was 10 hours and 50 minutes per week. This figure matches the one used for a number of years by the Panel, based on previous research with constituent Councils, to calculate the basic allowance.

We reviewed the levels of wage rates for Worcestershire as set out in the ASHE data (details in appendix 2) and the benchmark information available to us from the Chartered Institute of Public Finance and Accountancy (CIPFA) “nearest neighbours” Authorities as part of our research into the level of basic allowance recommended. We are also aware that the majority of local government employees received a 1% increase in pay in July 2016.

The calculation used to arrive at the Basic allowance is set out at appendix 2.

Special Responsibility Allowances (SRA) 2017-18

General Calculation of SRAs

The basis for the calculation of SRAs is a multiplier of the Basic Allowance as advocated in the published Guidance.

The Panel has reviewed the responsibilities of each post, the multipliers and allowances paid by similar Authorities. As in previous years, the Panel has benchmarked the allowances against those paid by Authorities listed as “nearest neighbours” by CIPFA.

The Panel has been asked on occasions to consider recommending SRA’s for Vice-Chairmen of Committees. Having considered evidence presented to us and the nature of the roles, as a principle the Panel does not recommend SRA’s for Vice-Chairman roles.

Appendix 1 to this report sets out the allowances recommended for 2017-18. We have reviewed the multipliers used for Chairmen of Planning and Overview and Scrutiny Committees this year, in response to comments received from Councillors. We have reiterated our recommendations concerning Planning Committees for the following reasons:

- the research undertaken across nearest neighbour Authorities indicates that the multipliers recommended for these roles (1 for Planning, 1.5 for Overview and Scrutiny) are appropriate;
- We maintain our view that the level of responsibility of the role of Chairman of Overview and Scrutiny in keeping a watching brief across all executive areas of the Council’s work, and that of various external agencies, justifies a multiplier to match that of portfolio holders.

Mileage and Expenses 2017-18

The Panel notes that the Council has used the HMRC flat rate for payment of mileage for Councillors and recommends that this continues.

The Panel is satisfied that the current levels of subsistence allowances are set at an appropriate level and recommends that these continue.

The Panel notes that the Council's Scheme of Members' Allowances provides that Dependant Carer Allowances are payable to cover reasonable and legitimate costs incurred in attending approved duties and recommends that this provision continues.

Allowances to Parish Councils

The Independent Remuneration Panel for Worcestershire District Councils acts as the Remuneration Panel for the Parish Councils in each District.

This year the Panel has not been asked to make recommendations on any matters by the Parishes in Bromsgrove District. As in previous years we repeat the former District Council Panel's recommendation relating to Parish Council travel and subsistence allowances.

The Independent Remuneration Panel

The Members' Allowances Regulations require Local Authorities to establish and maintain an Independent Remuneration Panel. The purpose of the Panel is to make recommendations to the Authority about allowances to be paid to Elected Members and Local Authorities must have regard to this advice. This Council's Independent Remuneration Panel is set up on a joint basis with 4 of the other 5 District Councils in Worcestershire. Separate Annual Reports have been prepared for each Council.

The members of the Panel are:

Bill Simpson MBE JP, the Chair of the Panel – Bill spent 30 years in Further Education culminating in 11 years as Principal of Pershore College. He then entered the private sector as Director of two national Horticultural Societies, one being the Royal Horticultural Society. He served as a magistrate for 9 years until retirement. He is a Trustee of several charities including chiring Thrive – the national Society for Horticultural Therapy between 1993 and 2008 and currently the Hopmarket Charity in Worcester. A Past President of the professional Institute of Horticulture he returned to the Council in 2012 to achieve chartership with the Royal Charter being awarded in 2014. At the present time he is Vice Chair of Governors of Red Hill CE Primary School Worcester and a Chair/Member of the County Council, Academy and Diocesan Panels for Schools Preferences Appeals. Appointed a Member of the British Empire (MBE) in 2011 for services to horticulture and the local community.

Rob Key – Rob has 42 years' experience of working in District Councils in a variety of operational and management roles, including senior positions at Worcester City, Wychavon District and Wyre Forest District. He was an Independent Chair for the Strategic Health

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Authority for Continuing Care and sits on County Council Appeals Panels for School Preference Appeals and Service Complaints.

Elaine Bell, JP, DipCrim – Elaine has been a Magistrate for 21 years on the South Worcester Bench. She was Deputy Chair of the Bench for 5 years, standing down in July 2014 when bench boundaries changed. She was Chair of the Bench Training and Development Committee for 9 years, and sat on the Magistrates Advisory Panel for 9 years (interviewing and selecting applicants for appointment as Magistrates). She sits as Chair in both Adult and Family courts in the newly constructed Worcestershire Bench stretching geographically from Hereford, Kidderminster, Redditch and Worcester. She is also Chair of the Lloyds Educational Foundation, past member of Sytchampton School Appeals Panel; Past Hon Treasurer of Ombersley and Doverdale Tennis Club and a Past Governor of Ombersley Primary School.

Terry Cotton - Terry spent 34 years working in central and local Government, mostly managing regeneration programmes across the West Midlands. Until May 2011 he worked at The Government Office for The West Midlands where he was a Relationship Manager between central and local Government and a lead negotiator for local performance targets. Following voluntary early retirement in May 2011, he worked part-time in Birmingham's Jewellery Quarter; setting up a new business led community development trust and currently works part-time for Worcestershire County Council. He is also a trustee of a small charitable trust providing grants to grass roots community initiatives in deprived communities.

Don Barber – After several Human Resources and Productivity Improvement Management roles in Industry, Don became Chief Executive of a change management facilitating consultancy. Over the last 20 years he has been an independent consultant and advisor on a number of United Nations, European Commission, and World Bank transition projects, in particular in Europe, Africa, Asia, and Australasia. He also operates in an advisory role to other consultancy groups seeking EU contracts. This experience has included the development of national civil service/public sector reform programmes including aspects of the effect of legislative change for central and local government and, in the U.K., working for the Office of Manpower Economics (advisors to the Prime Minister) on Public Sector Pay, in particular relating to: Civil Service Pay Reform, UK Armed Forces and the Medical Professions.

The Panel has been advised and assisted by:

- Claire Chaplin and Margaret Johnson from Worcester City Council;
- Sheena Jones from Bromsgrove and Redditch Councils;
- Mel Harris from Wychavon District Council;
- Matthew Box from Malvern Hills District Council.

The Panel wishes to acknowledge its gratitude to these officers who have provided advice and guidance in a professional and dedicated manner.

Bill Simpson, Chairman of Independent Remuneration Panel

Appendix 1

Independent Remuneration Panel for District Councils in Worcestershire Recommendations for 2017-18

Bromsgrove District Council

Role	Recommended Multiplier	Current Multiplier	Recommended Allowance £	Current Allowance (paid) £
Basic Allowance – all Councillors	1	1	4,300	4,326
Special Responsibility Allowances:				
Leader	3	3	12,900	12,978
Deputy Leader	1.75	2	7,525	8,653
Cabinet members (Portfolio Holders)	1.5	1.3	6,450	5,624
Chairman of Overview and Scrutiny Board	1.5	1.3	6,450	5,624
Chairman of Overview and Scrutiny Task Groups	0.25	0.25	1,075 Paid pro-rata for length of task group	1,082 Paid pro- rata for length of task group
Chairman of Audit, Standards Governance and Committee	0.25	0.25	1,075	1,082
Chairman of Planning Committee	1	1.3	4,300	5,624
Chairman of Licensing Committee	0.3	0.3	1,290	1,298

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Role	Recommended Multiplier	Current Multiplier	Recommended Allowance £	Current Allowance (paid) £
Political Group Leaders	0.25	0.25	1,075 (If a Group Leader is in receipt of any other S.R.A. allowance is reduced by 50%)	1,082
Chairman of Appointments Committee	0	0.03	0	130 per meeting
Chairman of Electoral Matters Committee	0	0.03	0	130 per meeting
Chairman of Appeals Committee	0	0.03	0	130 per meeting
Chairman of Standards Sub-Committee (excluding the Chairman of the parent Committee)	0	0.03	0	130 per meeting

Summary of Research

Chartered Institute of Public Finance and Accountancy (CIPFA) “Nearest Neighbour” Authorities tool.

No two Councils or sets of Councillors are the same. Developed to aid local Authorities in comparative and benchmarking exercises, the CIPFA Nearest Neighbours Model adopts a scientific approach to measuring the similarity between Authorities. Using the data, Bromsgrove District Council’s “nearest neighbours” are:

- Stroud
- Lichfield
- Maldon
- South Staffordshire
- Harborough
- Tewkesbury

Information on the level of Basic and Special Responsibility Allowances was obtained to benchmark the levels of allowances recommended to the District Council.

Annual Survey of Hours and Earnings (ASHE) Data on Pay

<https://www.nomisweb.co.uk/articles/980.aspx>

Published by the Office for National Statistics, the Annual Survey of Hours and Earnings (ASHE) shows detailed information at County and District level about rates of pay. For benchmarking purposes the Panel uses the levels for hourly rates of pay excluding overtime. This is multiplied by 11 to give a weekly rate, which is then multiplied by 44.4 weeks to allow for holidays. This was the number of hours spent on Council business by frontline Councillors which had been reported in previous surveys and substantiated by a survey with Worcester City Councillors in the autumn of 2015. The rate is then discounted by 40% to reflect the element of volunteering that each Councillor undertakes in the role.

CPI (Consumer Price Inflation)

In arriving at its recommendations the Panel has taken into account the latest reported CPI figure available to it, published by the Office for National Statistics. This was 0.9% for October 2016 – October 2017.

Taxpayers’ Alliance Research Findings for Councillors’ Allowances 2015
published 8th March 2016

http://www.taxpayersalliance.com/councillors_allowances_2015

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The report summarises allowances paid to Councillors across the country during 2014-15 and reports that in the West Midlands the basic allowance ranged between £2,902 and £16,267.

Using information from this report the Panel calculated an average basic allowance in the West Midlands region of £4,107 in 2014-15.

Bromsgrove District Council

Report of the Portfolio Holder for Environment and Worcestershire Regulatory Services

Aligned to Help me to Keep my Place Safe and Looking Good

I am pleased to present my report to councillors for the areas covered by my portfolio. In so doing I would like to look back over recent events and forward to emerging issues affecting our council and our residents.

BEREAVEMENT SERVICES

BROMSGROVE CEMETERY, CHURCH LANE

Badger issue:

The badgers occupying the main sett in a private garden adjacent to the cemetery have excavated two additional entrance holes in the grass verge near to their sett. They have also excavated three holes between the graves, which are separated from their sett by a path. Previous works carried out have been to install a badger fence between the path and the main sett which may mean that the three holes in question are small outlying setts, rather than entrance holes leading to the main sett.

Following a period of monitoring authorised by the first license application, it has been deduced that the holes are directly connected to the main sett and as such a further licence application has been made to approve a live dig to close down the holes and promote a change in behaviour to use a newly created bank to access the main sett in future.

The license application was submitted for the live dig to happen on the 15th November with Mid Warwickshire Wildlife Trust, Natural England and other approved contractors installing more underground fencing, excavation of current tunnels and filling with hardcore once agreed that it is appropriate. Finally production of a new 'mound' to provide extra areas within the cemetery that the badgers can use to tunnel back to the main sett.

BROMSGROVE NORTH CEMETERY, BARLEY MOW LANE, CATSHILL

Following a period of works which commenced on the 4th July 2016, the construction of the necessary infrastructure including the main access road, footpaths, fencing, surface water drainage with off-site infiltration soak away system and ancillary works is nearing completion. We will shortly be moving into the process of researching and consulting on the options that we will provide on the new site.

CORE ENVIRONMENTAL OPERATIONS

HIGHWAYS WORK

At the start of the year we worked with County and took on the grounds maintenance of Bromsgrove Highway from Slideslow Island in Bromsgrove to the boundary of Redditch, in addition to the street cleansing that we traditionally do. We have recently had the second closure where we carried out all the maintenance work using operatives from both Bromsgrove and Redditch Place and Core Teams. The results were excellent and the teams worked well from both authorities. The work carried out included: tree lifting and removal, spraying, mowing, strimming, flailing, cleansing and sweeping. The County Council pay us for this additional work.

VEHICLES

This year we have invested in our refuse service by ordering 5 new 26 tonne refuse collection vehicles. These vehicles comply with the latest Euro 6 Environmental Standards including 360 degree camera recording systems, lane departure warning systems, cycle safety, together with route optimisation and communication software. Due to the current high demand for these vehicles delivery times have been delayed and we should receive these vehicles during May next year.

WASTE COLLECTIONS

- New filming of recycling awareness is taking place in November 16 to be added to the council's You Tube profile and to be used elsewhere;
- New recycling awareness tags are to be launched from January 17 to assist in the education of residents regarding contamination. Leaflets have also been produced to be delivered to target areas, again in January 17;
- In Cab units are now fitted to all RCV's working on both domestic and recycling collections. This is currently being trialled to assess coverage areas and should be live from late November to early December 16. These units allow the crews to report issues such as bins going in the backs of trucks, or bins not out, in real time and they also allow us to see where the vehicles are on their rounds.
- Trade waste is now making a small surplus as officers continue to promote the service;
- Officers have managed to retrieve around 20 customers who had previously left the Trade Waste Service, resulting in an increase in revenue and extra positive publicity;
- Trade Waste leaflets are continuing to be used in the business rates details for 17/18 financial year;
- A Trade waste recycling service is to be introduced in 17/18;
- Officers are currently exploring options to work with neighbouring authorities.

Garden Waste:

- Garden waste fees are to increase to £42.00 from February 17.

Sweepers:

- Route optimisation software has been recently purchased (September 16) and is currently being worked on and reviewed by officers.

BDC PLACE TEAMS

Place working is now in its second year and is still evolving as the staff and teams develop greater awareness of their areas and adjust their work to meet that demand. Prioritisation has improved across the three teams, allowing us to use our time more efficiently and achieve the following without additional staff and resources:

- A higher number of cuts on our grass verges and open spaces than was achieved in 2015, despite the challenge of exceptional growth rates this year. Further improvements are expected to increase this further in 2017.
- An increasing number of Bulky Waste collections, which generate additional income for the council, with over 1600 collections carried out since April.

Unfortunately, fly tipping is on the increase with over 1,100 fly tips collected so far this financial year. These have ranged from small single items through to significant lorry loads requiring our HIAB to remove using large skips and the hydraulic grab.

Our relationship with BDHT has continued to develop, and we are now carrying out a wide range of paid clearance jobs on their behalf whilst working to reduce the impact of fly tipping on their bin stores. Working closely with our refuse team, we have now agreed a more streamlined approach with BDHT to address the problems at the remaining trouble spots where residents are fly tipping and causing other problems, so that issues can be escalated and resolved rather than creating additional work and cost for both BDHT and BDC.

We are still working closely with WCC as part of Project Optimise, and have completed projects on the Bromsgrove Highway, A38, and the Oakalls estate to share resources and increase the standard of maintenance in line with our strategic purpose, but with minimal cost impact on either BDC or WCC. This has been highly successful to date and it is hoped that we will do more joint projects with WCC over the coming year to continue improving the maintenance of our District.

Ongoing partnership working with BDHT has helped manage issues in their bin stores due to fly tipping and misuse. This benefits their residents, and generates additional income for BDC. Recent discussions have set out a more joined up

approach to these issues so that BDHT can focus on resolving the causes of the problems, with support from BDC Officers.

BDC Enforcement Highlights

- April 2016 – Joint stop and search project took place with the police in the Wythall area to tackle illegal transporting of waste and fly tipping. No breaches found.
- Three fly tips currently under investigation and awaiting PACE interviews.
- One fly tip prosecution being prepared with Legal Team for court process.
- April 2016 - £300 FPN paid for breach of 'Duty of Care' for disposal of waste after local resident identified fly tipping. Covered in local press.
- Joint working with Co-ordinators to gather evidence on fly tips and issue warning letters where prosecution not appropriate.
- October 2016 - Fly Posting Project started across the District to remove posters and warn organisations of the penalties if they erect any in the future.
- Routine patrols in Bromsgrove Town Centre to address issues arising from local businesses and work with them to resolve them:
 - Fast food outlets in Bromsgrove now starting to carry out additional litter picking as part of their closing routine after being spoken to by our enforcement officer. Still working well 6 months on.
 - Pubs have been spoken to about smoking related litter and are continuing to support us on this in Bromsgrove Town Centre.
 - New Market organisers working with us to address market waste being disposed of in our litter bins. Issue reduced, but now involving the Town Centre Manager in this process to address few remaining issues.
- Closer working with Parish Councils regarding littering, fly tipping and dog fouling – letter dropped warning letters regarding known issues.
- 135 Abandoned Vehicles investigated and dealt with since 1st April 2016.
- On-going partnership with Enforcement teams from Wychavon, Wyre Forest and Worcester City to share best practice in tackling environmental crime.

BROMSGROVER AREA NORTH WORCESTERSHIRE WATER MANAGEMENT

Lead on specific location Flood Investigations and works by land owners, Highways, STW and NWWM to reduce flood risk at:

1. Wast Hills Lane;
2. Dagnell End Road;
3. Lea End Lane;
4. Cherry Pit Lane;
5. Bentley Pauncefoot work with Parish Lengthsman on ditches and hotspots;
6. Sidemoor School culvert removal;
7. Wythall gypsy site clearance of dumped rubbish to reinstate flow in the watercourse, working with Rooftop Housing and BDC Environmental Services;
8. Cross Boundary working with Solihull on highway flooding issues;
9. Belbroughton - advising the Parish Council following defects appearing in a pool dam.

Major Schemes achieved or ongoing:

10. Hagley Infrastructure Scheme working with STW, Environment Agency and Highways to reduce Hagley flood risk and increase capacity and resilience on watercourses, highway network and STW surface water sewers;
11. Callowbrook - completed the flood storage pools in November and have since undertaken planting and recently some earth moving and finishing touches. EA grant was £50k and contributions of over £20k from County and Local Councillor;
12. Bournheath - flood risk modelling undertaken and scoping options for a scheme to reduce flood risk to the village, properties and highways. Likely total scheme cost of around £200k. Preliminary Grant bid with E.A. and hope to get approval before January to link up with significant STW works at same time to reduce foul sewer flooding issues;
13. Bromsgrove Town Surface Water Management Plan Group - Membership includes NWWM, EA, BDC Environmental Services, Highways. Multiple locations have had flood risk issues resolved in and around town. Ongoing E.A. flood risk modelling at present and investigations over next year on whether a major flood defence scheme is warranted and feasible;
14. A38 Charford flooding issues - Work to investigate opportunities for funding and works with STW, Highways, Economic Development, EA. Early stages at present of understanding infrastructure and building a working group.

General activities:

15. Flooding Hotspot guide produced to aid the PLACE teams working in lead up to and response to flood events. Including a health and safety review for each;

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16. Recording assets (e.g. culverts, trash screens etc) onto a countywide web mapping system;
17. Revising the sandbag policy;
18. Reviewing the Multi-Agency Flood Plans and putting together Flood Response plans to guide actions in flood events;
19. Part of 'Love Your River Bromsgrove' working group helping to improve water quality and wildlife;
20. Response to Government consultation regarding proposed planning changes.

Planning work:

21. 15 Major applications consulted on from April 2016.
22. Very large site, Perryfields pre-planning advice role. Aiming to improve drainage across the wider area.

WORCESTERSHIRE REGULATORY SERVICES

Environmental Health

The service now boasts several Primary Authority agreements whereby a business enters into a contractual agreement with us on a full cost-recovery basis to receive assured advice. One of these is a major food warehouse in Stoke Prior. Further, several Bromsgrove businesses have signed up to the Healthy Eating award (which again is a paid for business support process) and work continues with the Local Enterprise Partnership (LEP) to develop a scheme aimed at helping small producers and manufacturers to access new markets.

82 food hygiene inspections were carried out in Bromsgrove District between April and August 2016 which is down on the same period last year. This reflects the high demand on resources involved in addressing the summer spike in reactive work and the fact that the service is currently involved in some complex enforcement activities including high profile prosecutions. Members should note the similar pattern of work in 2014/15 where the majority of food inspection work was done in the second half of the year. We expect 2016/17 to be similar in work pattern due to the volume of reactive work being undertaken and we will continue to monitor closely progress against the full inspection programme for the year so as to ensure that it is achieved. Compliance in Bromsgrove remains high at 97.4% with only 12 premises currently rated level 2 or below in the Food Standards Agency's Food Hygiene Rating Scheme (which rates business from levels 0-5). These businesses which are deemed not to be "broadly compliant" are subject to further intervention to ensure that hygiene requirements are met.

Environmental Health complaints, enquiries and notifications recorded by WRS are set to exceed previous years, with noise nuisance cases between June and September up on the previous year. The service has conducted an extensive investigation relating to an alleged odour nuisance arising from animal by-product operations in the District and Environmental Health Practitioners have continued to work with Network Rail and their contractors to minimise noise impacts of on-going track upgrade and electrification works through Bromsgrove.

Air Quality

The update of the Air Quality Action Plan has been published on the WRS website that details action taken to resolve air quality by all over the last 12 months. This is to be followed by the annual assessment report (known as Annual Status Report) which reports on air quality monitoring and considers all changes and their effects on air quality over the last 12 months. Ahead of LTP4's publication, WRS have been liaising with the County Council's Project Manager for the A38 Corridor improvements to ensure that improving the air quality situation around Redditch Road and Lickey End are priorities and incorporated in the proposals.

Permitted Processes

The Pollution Control regulations are there to protect human health by ensuring emissions to air, land and water are controlled. Certain industrial processes such as car resprayers and flexible packaging printers use large volumes of Volatile Organic Compounds (VOCs) which would be emitted to atmosphere if not controlled. There are other industrial processes that are regulated also, which means firms have to apply for a permit. In granting the permit WRS work with the business so that they know what they need to do to comply by using our wealth of experience of dealing with similar companies. Our aim is to support the businesses in navigating the red tape and protecting health and in Bromsgrove we believe most are compliant.

There are those companies that seek a competitive advantage by not controlling their emissions and operating without a permit. WRS have launched a campaign across the County to identify anyone who is operating illegally. You can check the WRS website for a list of all businesses that operate with the appropriate permit: <http://www.worcsregservices.gov.uk/media/1928600/May-2016-Public-Register-word-format.pdf> . If you suspect that a business is operating without a permit, please do not hesitate to call or check with our Permitting team on 01905 822799.

Licensing

Licensing Officers continue to monitor and respond to changes in national guidance and licensing legislation; the bi-annual data exchange for the National Fraud Initiative for taxi drivers, personal licence holders and street traders has just been completed successfully across the county and licensing is preparing for the implementation of the Immigration Act 2016, parts of which come into force for taxi licensing from 1st December 2016. Licensing Authorities will have to check that new and renewal applicants have the right to live and work in the United Kingdom prior to the issuing of a licence; licensing authorities will have to issue shorter licences if an applicant has limited leave to remain in the United Kingdom but can work while they are here so that the licence expires when the applicant's right to work expires.

Licensing has also completed this year's data exchange/match with each districts finance teams to aid reconciliation processes for those licences that each district invoices for – Premises licences/ Gambling Premises and Small Lotteries.

Licensing Officers are also participating in the "Safer Bromsgrove Licensed Sector Tasking Group" which is looking at issues in the Night Time Economy in and around the High Street/ Worcester Road Bromsgrove; and discussions are taking place with regards to whether or not things can be improved with joint working and the multi agency approach.

Licensing Officers are presenting new policies to the Licensing Committee in the areas of “Scrap Metal Licensing Policy” and on whether or not Members want to consider the introduction of a Hackney Carriage and Private Hire Penalty Points Scheme for taxi operators, vehicle owners and drivers.

APSE Award

We are very pleased to report that WRS were finalists in the “Best UK Environmental Health Team” category at this year’s Association for Public Service Excellence awards against very impressive competition. The awards exist to showcase the ability of Local Authorities to “pursue innovation within service delivery and implement new approaches aimed at improving the level of service to local communities and people”. The award submission focussed heavily on innovation and transformation work within your Community Environmental Health, Technical Services, Duty Officer and Intel Teams, including:

- The self-help package for nuisances
- Trying to resolve problems at the first point of contact through the Duty Officer system
- LEP work on schemes such as earned recognition
- The Healthy Choices Food award
- Working closely with legitimate businesses and their relevant trade bodies including business seminars
- Self-help for Planning Officers
- The creation of an EH Intel Team and tasking
- And carrying out contract work for other authorities.

COMMUNITY SAFETY

North Worcestershire Community Safety Partnership

North Worcestershire CSP (NWCSP) was created in May 2013. The Partnership provides a strategic and co-ordinated approach to addressing local community safety issues, working with a variety of public agencies and voluntary groups. Its vision is to keep North Worcestershire a safe place to live, work and visit. Local representation on the NWCSP is fulfilled through myself as Portfolio Holder for Community Safety.

At district level there is an operational community safety group called Safer Bromsgrove. There are also a number of sub-groups to the CSP, namely North Worcestershire Hate Incident Partnership, the Bromsgrove and Redditch Safeguarding Adults Group and a newly established Bromsgrove and Redditch ASB forum.

Alongside the Council's status as a Responsible Authority in the CSP, there is also a direct role in holding the Police and Crime Commissioner (PCC) to account through the established West Mercia Police and Crime Panel. Again as Portfolio Holder for Community Safety, I am Bromsgrove District Council's representative on the panel.

North Worcestershire Community Safety Plan

NWCSP has a statutory duty to produce a three-year rolling plan outlining how it intends to address key crime and community safety priorities, as identified through its annual Strategic Assessment report.

The Strategic Assessment gathers research, evidence and intelligence from national and regional sources, as well as drawing on the professional expertise of those working locally. It is designed to be a point of reference and guidance to resource community safety initiatives among partner agencies across the area.

The latest Strategic Assessment is currently being produced and its findings will be used to draft a new Community Safety Partnership Plan for 2017-20.

The current North Worcestershire CSP priorities are:

- **Anti-Social Behaviour:** Work to reduce the number of anti-social behaviour incidents and bring perceptions in line with the downward trend in reported incidents
- **Burglary and Home Security:** Work to promote home security, reduce incidences of dwelling and non-dwelling burglary and improve residents' feelings of safety in their homes
- **Business and Rural Crime:** Support local delivery of the West Mercia PCC's Business and Rural Crime Strategies

- **Reducing Re-offending:** Work to increase our understanding of the reasons for re-offending in North Worcestershire and reduce the offending behaviour of targeted individuals through continued support of the Integrated Offender Management approach
- **Violence and Abuse:** Work to ensure residents are safe in their local neighbourhoods and at home without having to suffer violence, domestic abuse or hate crime.

CSP Funding 2016/17

NWCSP was awarded £149,250 in funding from the West Mercia Police and Crime Commissioner in April 2016, with funding amounts again based on previous year's allocations. £29,595 of the total amount is allocated specifically to project delivery in Bromsgrove District and this funding directed by the Safer Bromsgrove group.

CSP Priority	Project/Initiative	Amount
All	NW Analytical and Research Support	£24,000
Anti-Social Behaviour	Youth Diversionary Projects – Bromsgrove and Redditch	£10,000
Violence & Abuse	NW Hate Incident Partnership	£3,000
Reducing Reoffending	NW Integrated Offender Management Projects	£5,000
Multiple	Safer Bromsgrove	£24,595
Multiple	Safer Redditch	£38,406
Multiple	Safer Wyre Forest	£44,249
	TOTAL	£149,250

The West Mercia Police and Crime Commissioner also allocated 2016/17 funding amounts for the following countywide projects. Delivery of these projects also directly benefits local communities in Bromsgrove.

Hate Crime Awareness Week/Safe Places Scheme	£10,000
Integrated Offender Management Strategic Development	£40,700

NWCSP Work Programme

Crime and ASB Data - The Partnership receives a regular crime and ASB update provided by the NWCSP Research and Information Officer. The performance report is compiled using various sources of partner data and provides information on current crime and ASB trends across the 3 districts. The update highlights geographical areas of concern, increases or decreases in crime types and areas where additional resources may be required.

CSP Sub Groups – The partnership receives regular updates from its various sub-groups regarding current project activity, specific successes and any areas where there may be barriers or concerns that require escalation to Strategic Managers and Senior Officers.

Safer Communities Board (SCB) – The Partnership receives updates from the countywide SCB which provides the upper-tier strategic management for community safety activity taking place across Worcestershire. The SCB has responsibility for monitoring and directing activity around Integrated Offender Management, the Domestic Abuse and Sexual Violence Forums, Alcohol/Substance Misuse and Preventing Violent Extremism. The SCB was also instrumental in implementing the recent review of Community Safety Arrangements in Worcestershire.

Community Safety Review – The findings of the SCB review were presented to NWCSF in March 2016 and suggestions included consideration of a CSP self-assessment process; improvements to the reporting arrangements between the CSP and the SCB to develop stronger, more consistent formalised reporting lines between the two groups; and development of an annual induction programme for CSP members to ensure that partners statutory responsibilities are fully understood.

NWCSF acknowledged the findings of the review and quickly began to implement the suggestions, conducting a self-assessment process and holding a partnership induction session at the following meeting in the June 2016.

Safer Bromsgrove Group

Safer Bromsgrove is the district operational group responsible for delivery of the local action plan on behalf of the CSP. The group receives a district specific version of the crime and ASB update at each meeting and partners work together to develop and implement projects to address local community safety issues across Bromsgrove District.

As well as receiving support from the Council's Community Safety Team and other partners, Safer Bromsgrove has funded a dedicated Bromsgrove Community Safety Project officer as well. The Project Officer liaises with local residents and partners, carries out community safety assessments and site surveys and co-ordinates crime reduction activity on behalf of the group. Currently the Project Officer is working on crime reduction projects in Rock Hill, Aston Fields, Charford, Catshill, and Romsley.

Safer Bromsgrove has agreed to be a consultation forum and provide crime & ASB data to support the review of CCTV provision across the district, in accordance with the requirements of the Surveillance Camera Code of Practice.

A Bromsgrove Town Centres sub-group has been established following identification of a number of crime and ASB issues linked to the Night Time Economy in the High Street/Market Street area. The group was initially set up to look at licensing issues but has since widened its remit to look at other areas such as business crime and wider environmental issues in the Town Centres. The group includes local business owners and other stakeholders and is chaired by Cheryl Welsh, Bromsgrove Centres Manager. As a Community Safety sub-group, it will be able to tap into crime reduction expertise, prevention information and funding in order to support any interventions or solutions identified by members.

Activities to raise awareness of Hate Crime reporting took place in Bromsgrove on Friday the 14th October as part of national Hate Crime Awareness week. The Community Safety team organised a pop-up stall on the high street with street theatre performances to raise awareness of the issue and how to report incidents. The stall received a steady stream of visits from local residents and shoppers and also a surprise visit from Bromsgrove MP, Sajid Javid who tweeted his support for the event and posted a video of the activities during the day from his social media account

The Community Safety Schools programme is active in all middle and high schools in Bromsgrove offering a wide range of community safety workshops around subjects such as Hate Crime, Domestic Abuse, Substance Misuse and the impact of ASB on Communities. Alongside workshops and whole school activity days, the programme also offers one to one mentoring sessions for young people identified as being at risk of entering the criminal justice system or at risk of becoming victims of crime. Between Sept 2015 and June 2016 over 40 young people from Bromsgrove had received mentoring support through the programme, to reduce their risk of harm.

In Spring, Safer Bromsgrove provided funding for a youth work diversionary project at Churchfields in an attempt to engage with and divert young people gathering and causing disorder in the ASDA multi-storey car park. The project was devised by the YMCA Positive Activities worker, in partnership with the Community Safety Team, the local SNT and ASDA's Management team. The project provided detached youth workers to engage with young people through multi-sports and launched in June 2016 to coincide with half- term. There was a significant drop in the number of young people hanging around the site throughout the summer holidays and, together with the additional security measures at the car park, the project appears to have reduced the number of ASB incidents reported at the site. The project is now on hold as we go into the colder weather and partners are constantly reviewing ASB reports to ensure that the problem has not been displaced to other areas.

Finally, Safer Bromsgrove has provided funding to support an intergenerational project idea put forward by students at North Bromsgrove High School. The project began in September 2016 and pairs a group of students with a group of older residents from BDHT Supported Housing accommodation and together they are

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working on a photography project with a community safety theme. This project will be showcased at a school event at the end of the programme in March.

CABINET7th December 2016**NHB COMMUNITY GRANTS PANEL**

Relevant Portfolio Holder	Cllr Geoff Denaro
Portfolio Holder Consulted	Yes
Relevant Head of Service	Jayne Pickering, Executive Director Finance & Resources
Wards Affected	All
Ward Councillor Consulted	N/A
Key Decision / Non-Key Decision	

1. SUMMARY OF PROPOSALS

- 1.1 The purpose of this report is to allow Cabinet to consider the findings and recommendations of the NHB Community Grants Panel following a second round of bids being opened up on 26th September 2016.

2. RECOMMENDATIONS

- 2.1 **That Cabinet agree to return the funds allocated to Hagley Tennis Club in 2015/16 to the brought forward funds, giving a total available for allocation in Round 2 of £27,324.**
- 2.2 **That the Head of Leisure and Cultural Services be asked to consider requesting a budget pressure in respect of the work detailed in Application 7 (see appendix 2);**
- 2.3 **That Cabinet agree the grants, as detailed in the Summary of NHB Grants Panel Recommendations attached at appendix 1;**
- 2.4 **That Cabinet recommend to full Council that the remaining balance of £27,157 which equates to the balance of the funds unallocated in 2016/17 be carried forward to 2017/18 as an earmarked reserve; and**
- 2.5 **That Cabinet agree to a full and detailed review of the NHB Community Grants Scheme including the administrative arrangements to take place prior to the commencement of the 2017/18 bidding process.**

3. KEY ISSUES

- 3.1 This is the second year of the NHB Community Grants Scheme. Following the 2015/16 applications the scheme was reviewed and a

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report was considered at Cabinet on 1st June 2016. As part of the review of the scheme officers assessed how other Councils allocate funding and it was agreed that funding be allocated on the basis of the homes that have been completed in a particular area during 2014/15, as this is the most recent complete year of data being available. It is appreciated that this would not take into account homes that have been brought back into use nor would it reduce allocations for empty/void properties. It is considered that this allocation basis, as used by other Councils, would be the fairest way to ensure a consistent framework for all communities who have been affected by growth. The funding available of £101,004 was distributed in this way.

- 3.2 It was agreed that the amount of £23,860 which was brought forward from the previous year, would be available for any Ward that could show growth. That an application be submitted and considered by the Panel.
- 3.3 Applications were invited over the period from 20th June to 29th July 2016, with the NHB Community Grants Panel meeting on 16th and 17th August 2016 to consider the applications at public meetings. Following that process a report was considered by Cabinet at its meeting on 7th September 2016, with an overall total of £52,536 being allocated to various schemes. This resulted in an overall unallocated balance of £72,328. It was therefore agreed that a second round of bids be opened up to give an opportunity for those funds to be used.
- 3.4 Applications were therefore invited over the period from 26th September to 28th October 2016 with the NHB Community Grants Panel meeting on 16th November 2016 to consider the applications at a public meeting. Following the public meeting the Panel Members met in private to consider the applications in detail and review the process. The outcome of those deliberations is attached at Appendix 1 for Cabinet's consideration.
- 3.5 In respect of Application No 8, Arundel Road Public Open Space and Play Area and Oakalls Play Area. After consideration of the application Members were in agreement that it would not be appropriate use of the funds from this scheme, as from the information provided; it appeared to be the responsibility of the Council. It is therefore recommended that the Head of Leisure and Cultural Services be asked to consider requesting a budget pressure in respect of the work detailed.
- 3.6 During the course of its meeting held on 16th November, the Panel was also provided with information in respect of an outstanding application from 2015/16. This was for the Hagley Tennis Club and following receipt of the update on the project, the Panel was unanimous in its recommendation that the £15,000 initially awarded to the project be

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returned to the balances brought forward for 2015/16 as none of the criteria which had been stipulated in the offer of the grant had been met within the 12 month period set down in that offer.

Financial Implications

- 3.7 As detailed in Appendix 1 £61,636 of grants has been recommended by the Panel to be approved by Members, which includes £27,324 from the balance brought forward for 2015/16.

Legal Implications

- 3.8 There are no direct legal implications as a result of the grants being approved.

Service / Operational Implications

- 3.9 The allocation of funding will support the provision of projects within local communities and do not impact on the operational services provided by the Council.

Customer / Equalities and Diversity Implications

- 3.10 The scheme allows all communities that are affected by growth to apply for a grant.

4. RISK MANAGEMENT

- 4.1 The annual scheme based on the additional funding received from NHB for each financial year mitigates the impact on the Medium Term Financial Plan and ensures that should NHB be revised in the future there is no future commitment from the Council.

5. APPENDICES

Appendix 1 – Summary of NHB Grants Panel Recommendations
Appendix 2 - Summary of Applications
Appendix 3 – Ward Breakdown of funds to be carried forward to 2017/18.

6. BACKGROUND PAPERS

NHB Grants Scheme and FAQs

7. KEY

None

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AUTHOR OF REPORT

Name: Jayne Pickering – Executive Director, Finance & Resources
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Ward Name	Amount of NHB Grant per Ward (£443 x Completed during 2014/15)	Where adjoining Wards have been added together	First Round of bids claimed for the Ward	Second Round of bids claims for the Ward	BALANCE CARRIED FORWARD FROM 2016/17 to 2017/18
Alvechurch South Ward	1,329.00			160.00	34.00
Alvechurch Village Ward	443.00	1,772.00	1,578.00		0.00
Aston Fields Ward	0.00		0.00		0.00
Avoncroft Ward	5,759.00		5,759.00		0.00
Barnt Green and Hopwood Ward	886.00		886.00		0.00
Belbroughton and Romsley Ward	4,430.00		4,430.00		0.00
Bromsgrove Central Ward	886.00		0.00		886.00
Catshill North Ward	886.00				0.00
Catshill South Ward	11,961.00	12,847.00	8,347.00	4,400.00	100.00
Cofton Ward	886.00		815.00		71.00
Drakes Cross Ward	0.00		0.00		0.00
Hagley East Ward	11,518.00				0.00
Hagley West Ward	4,430.00	15,948.00	15,948.00		0.00
Hollywood Ward	443.00		0.00		443.00
Lickey Hills Ward	2,215.00		0.00		2,215.00
Marlbrook Ward	0.00		0.00		0.00
Norton Ward	2,658.00		0.00		2,658.00
Perryfields Ward	0.00		0.00		0.00
Rock Hill Ward	1,772.00		1,772.00		0.00
Rubery North Ward	1,772.00		0.00	1,400.00	372.00
Rubery South Ward	1,772.00		0.00		1,772.00
Sanders Park Ward	7,531.00		0.00		7,531.00
Sidemoor Ward	3,101.00		0.00		3,101.00
Slideslow Ward	7,974.00		0.00		7,974.00
Tardebigge Ward	28,352.00		0.00	28,352.00	0.00
TOTAL:	101,004.00		39,535.00	34,312.00	27,157.00

Balance brought forward from 2015/16

23,860.00 First Round

11,536.00

12,324.00

Hagley Tennis Club returned to balance fo 2015/16

Second Round

15,000.00

27,324.00

27,324.00

0.00

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Amendments to update the Bromsgrove Car Parking Order

Relevant Portfolio Holder	Cllr Karen May
Portfolio Holder Consulted	Yes
Relevant Head of Service	Guy Revans
Ward(s) Affected	All
Ward Councillor(s) Consulted	N/A
Non-Key Decision	

1. SUMMARY OF PROPOSALS

- 1.1 Car parking in the district is currently regulated by the Bromsgrove District Council (Off-Street Parking Places) Order 2015. A number of aspects of the existing order are now out of date due to changes to car parks in the centre of Bromsgrove and following the opening of the new Bromsgrove station. This report therefore seeks Members approval to revisions to the existing order to bring it up to date, and to a revised fees and charges schedule for parking to reflect the changes to the car parking order.

2. RECOMMENDATIONS

Cabinet is asked to resolve:

- 2.1 to approve and adopt the Bromsgrove District Council (Off-Street Parking Places) Order 2017 (as attached at Appendix 1), and to delegate to the Head of Environment Services, and the Head of Legal Equalities and Democratic Services the task of implementing the new parking order in accordance with the relevant legislation.

Cabinet is asked to recommend to Full Council:

- 2.2 to approve the revised schedule of fees and charges for parking (as attached at Appendix 2) and for the revised fees to come into effect from the date of adoption of the new car parking order.

3. KEY ISSUES

Financial Implications

- 3.1 As the recommendations in this report seek primarily to rationalise existing charges rather than to introduce new ones, it is anticipated that any effect on car parking revenue will be minimal.

- 3.2 There will be costs involved in updating the signage for the various car park pay and display machines, tariff boards and there will be a cost to amend the ticket machine to enable the free issue of timed tickets at Aston Fields car park.

Legal Implications

- 3.3 Bromsgrove District Council operates a system of providing off street parking for residents under the Road Traffic Regulation Act 1984. The legislation allows the Council to designate off street car parks (Section 32) and regulate their operation, including the levying of charges through a local parking order (Section 35). The current parking order in force is the Bromsgrove District Council (Off-Street Parking Places) Order 2015.
- 3.4 The process for updating the order is prescribed by the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996.

Service / Operational Implications

- 3.5 The car parking order was last updated using delegated powers in October 2015. No changes were made to charges but the revisions covered the closure of Recreation Road North car park which had been sold to developers, and the introduction of Parkside Office car park.
- 3.6 The 2015 order now requires further revision to reflect the following changes:-

Disposal of Hanover Street Car Park

The sale of the land making up the Hanover Street Car Park was completed in July 2016 and the car park was closed in August 2016. As such the car park needs to be removed from the current car parking order. Members will be aware the land is currently being re-developed as a Waitrose store. The Council has agreed to act as the operator of the car park once it has been completed and a further revision of the car parking order will be required in April 2017 to include the refurbished car park.

Re-designation of short stay and long stay car parks

The Council had previously designated Hanover Street, School Drive, Stourbridge Road and Recreation Road North as long stay Pay and Display car parks. This was reflected in the tariffs for these car parks and also enabled holders of Long Stay Permit Holders to use any of those three car parks. With the closure of Hanover Street and Recreation Road North there has been feedback from customers that there is insufficient provision in the town centre for Long Stay Permit Holders. Accordingly officers are recommending that New Road car park and Parkside car park are re-designated as long stay and that the long stay tariff is applied.

Charges for Long Stay Permits

The current charge for a Long Stay Permit is £320.00 per annum. In addition the Council offers Long Stay Permits at Churchfields Multi-Story or Stourbridge Road for £215.00 per annum. Officers are recommending that the tariff of £215.00 for the multi-storey be retained. For Stourbridge Road Car Park, the proposal is for this to be included in the general Long Stay Permit going forward. Therefore the fee of £215.00 for this car park would be removed, and the car park would be available for use under the general Long Stay Permit.

Dolphin Centre Car park

This car park is currently being used by the contractors working on the new sports centre development and will then form part of the new car park for the facility, it is proposed to remove this car park from the Parking Order.

Bromsgrove Station

The new station facilities at Bromsgrove Station opened in July 2016 including car parking spaces provided by West Midlands Combined Authority for 350 spaces. In light of this, officers have been reviewing the future use of the Council owned 45 space car park at the site of the former station. The tariff is currently £3.00 per day. Officers are proposing the introduction of a parking permit for use at the Station car park and would propose that the annual fee for this is £320 (limited to 40 permits). In addition, Members are asked to consider the car park being available for shoppers for a maximum period of 2 hours free of charge. This would address the need for provision of parking locally for the shops and businesses located on Stoke Road/ New Road. To differentiate the Council car park from the new station car park, and to avoid confusion to visitors to the station, it is proposed that the council car park be re-named as "Aston Fields Car Park".

- 3.7 Recreation Road South car park continues to operate under the Pay on Foot system. Whilst this works well there are occasionally issues when customers do not realise that there is a maximum time limit on their stay of 5 hours. To address this officers are proposing to amend the tariff to enable a maximum stay of 14 hours with fee increments of 80 pence per hour up to a maximum of £11.20 as set out in Appendix 2.
- 3.8 Members are asked to note that other than the changes to charges outlined above, the fees for parking are not being subject to any overall increases. Charges are only applied currently from the hours of 8am to 7 pm following on from the Cabinet decision on evening parking in 2014, and this report does not propose to make any changes to that arrangement.

Customer / Equalities and Diversity Implications

- 3.7 This report responds to customer feedback regarding loss of long stay car parking places in the town centre and seeks to redress this through changes to the Long Stay Permit arrangements.

3.8

4. **RISK MANAGEMENT**

4.1 There is a risk that introducing fee parking for shoppers at Aston Filed Car Park will lead to enforcement issues with parkers illegitimately overstaying. Officers are proposing to address this by requiring customers to obtain a ticket from the pay and display machine. Whilst there will be no charge for this a valid ticket will have to be displayed and this method will enable enforcement officers to police the car park more effectively.

4.2 There a risk associated with enforcement following the introduction of changes to the tariffs and conditions of parking. Therefore it is proposed that enforcement officers will only issue warning notices for a period of 2 weeks for contraventions that have been amended following the adoption of the new parking order.

5. **APPENDICES**

Appendix 1 - Bromsgrove District Council (Off-Street Parking Places) Order 2017

Appendix 2 - Revised Schedule of Fees and Charges for Bromsgrove District Council (Off-Street Parking Places) Order 2017

6. **BACKGROUND PAPERS**

None

7. **KEY**

N/A

AUTHOR OF REPORT

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Environmental Services

SERVICE CATEGORY	VAT Treatment	Revised Net Total	VAT to be applied	Proposed charge from 2017 £	Comments
CAR PARKS					
Aston Fields					
All day	Standard	0.00	0.00	0.00	Following amendments to parking order - .Two hours minimum waiting. No return within two hours.
Churchfields Multi-storey					
Not exceeding 30 minutes	Standard	0.33	0.07	0.40	
Not exceeding one hour	Standard	0.67	0.13	0.80	
Not exceeding two hours	Standard	1.33	0.27	1.60	
Not exceeding three hours	Standard	2.00	0.40	2.40	
All day	Standard	2.50	0.50	3.00	
New Road					
Not exceeding 30 minutes	Standard	0.33	0.07	0.40	
Not exceeding one hour	Standard	0.67	0.13	0.80	New tariff structure on New Road car park
Not exceeding two hours	Standard	1.33	0.27	1.60	
Not exceeding three hours	Standard	2.00	0.40	2.40	
All day	Standard	4.17	0.83	5.00	
Parkside					
Not exceeding 30 minutes	Standard	0.33	0.07	0.40	
Not exceeding one hour	Standard	0.67	0.13	0.80	New tariff structure on Parkside car park
Not exceeding two hours	Standard	1.33	0.27	1.60	
Not exceeding three hours	Standard	2.00	0.40	2.40	
All Day	Standard	4.17	0.83	5.00	
Recreation Road South					
Not exceeding 30 minutes	Standard	0.33	0.07	0.40	
Not exceeding one hour	Standard	0.67	0.13	0.80	
Not exceeding two hours	Standard	1.33	0.27	1.60	
Not exceeding three hours	Standard	2.00	0.40	2.40	
Not exceeding four hours	Standard	2.67	0.53	3.20	
Not exceeding five hours	Standard	3.33	0.67	4.00	New tariff structure on Recreation Rd car park
Not exceeding eight hours	Standard	5.33	1.07	6.40	
Not exceeding eleven hours	Standard	7.33	1.47	8.80	
Not exceeding fourteen hours	Standard	9.33	1.87	11.20	
School Drive					
Not exceeding 30 minutes	Standard	0.33	0.07	0.40	
Not exceeding one hour	Standard	0.67	0.13	0.80	
Not exceeding two hours	Standard	1.33	0.27	1.60	
Not exceeding three hours	Standard	2.00	0.40	2.40	
All day	Standard	4.17	0.83	5.00	
Stourbridge Road					
Not exceeding 30 minutes	Standard	0.33	0.07	0.40	
Not exceeding one hour	Standard	0.67	0.13	0.80	
Not exceeding two hours	Standard	1.33	0.27	1.60	
Not exceeding three hours	Standard	2.00	0.40	2.40	
All day	Standard	4.17	0.83	5.00	
Windsor Street					
Not exceeding 30 minutes	Standard	0.42	0.08	0.50	
Not exceeding one hour	Standard	0.83	0.17	1.00	
Not exceeding two hours	Standard	1.67	0.33	2.00	
Season Tickets (valid for all Pay and Display Car Parks excluding Windsor Street, Hannover Street & Aston Fields)					
Annual	Standard	266.67	53.33	320.00	
Quarterly	Standard	66.67	13.33	80.00	
Season Tickets (valid at Aston Fields car park only)					

Annual	Standard	266.67	53.33	320.00	New Permit Option
Quarterly	Standard	66.67	13.33	80.00	
Season Tickets (valid at Churchfields Road car park only)					
Annual		179.17	35.83	215.00	
Quarterly		44.83	8.97	53.80	
Season Tickets (valid at Alvechurch Sports and Social club car park only)					
Annual		208.33	41.67	250.00	
Quarterly		52.08	10.42	62.50	

CABINET**7TH December 2016****FEES AND CHARGES 2016/17**

Relevant Portfolio Holder	Councillor Geoff Denaro
Portfolio Holder Consulted	Yes
Relevant Head of Service	Jayne Pickering , Director of Finance and Resources
Wards Affected	All
Ward Councillor Consulted	No
Non-Key Decision	

1. SUMMARY OF PROPOSALS

- 1.1 To set out the fees and charges to be levied on services provided by the Council as used as the basis for income targets in the Medium Term Financial Plan 2017/18 – 2019/20.

2. RECOMMENDATIONS

- 2.1 It is recommended that Cabinet consider the fees and charges as included at Appendix 1 and;
- 2.1.1 **recommend to Council** the approval of all fees and charges that are included in Appendix 1 which have a proposed increase for 2017/18 over the currently agreed budget assumption of 3%.
- 2.1.2 **approve** the fees and charges as presented in Appendix 1 that have no increase for 2017/18
- 2.1.3 **approve** the fees and charges as presented in Appendix 1 that have reduced for 2017/18.

3. KEY ISSUES**Financial Implications**

- 3.1 The Medium Term Financial Plan has been prepared on the basis that additional income will be generated from fees and charges. The guideline increase provided to Heads of Service was 3%.
- 3.2 It is proposed that the revised fees and charges will be advertised to the public within approved deadlines with a start date of 1st January 2017, where an invoice has not already been raised covering the last

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quarter of the financial year, or as soon as practicable thereafter, dependant upon the notice period required prior to implementation.

- 3.3 There are a number of increases that are in excess of the 3% approval which are identified in Appendix 1. The Heads of Service have commented within the Appendix as to the reasons for the increase.

3.4 **Garden Waste.**

The increase for 2018 requires approval during this budget round. The proposed increase for 2018 is £3 which equates to 7% increase on the current price of £42. The new charge will therefore be £45. This will take into account all associated increases in costs to the service including staffing and vehicle costs and will ensure the service continues to contribute to the financial position of the Council.

Legal Implications

- 3.5 A number of statutes governing the provision of services covered by this report contain express powers or duties to charge for services. Where an express power to charge does not exist the Council has the power under Section 111 of the Local Government Act 1972 to charge where the activity is incidental or conducive to or calculated to facilitate the Council's statutory function.

Service / Operational Implications

- 3.6 Monitoring will be undertaken to ensure that income targets are achieved.

Customer / Equalities and Diversity Implications

- 3.7 The implementation of the revised fees and charges will be notified in advance to the customer to ensure that all users are aware of the new charges and any concessions available to them.

4. RISK MANAGEMENT

- 4.1 There is a risk that if fees and charges are not increased that income targets will not be achieved and the cost of services will increase.

5. APPENDICES

Appendix 1 – Fees and Charges

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7TH December 2016

6. BACKGROUND PAPERS

None.

7. KEY

None

AUTHOR OF REPORT

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Finance and Resources

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
<u>LOCAL TAX COLLECTION</u>		3.00%		Costs must be based on actual costs and worked out in accordance with guidance provided. (0%) Statutory Fixed Fees and not subject to any change
- Council Tax Court Costs	65.60	1.97	67.60	
- NNDR Court Costs	93.20	2.80	96.30	
- Magistrates' court fee (added to both council tax and NNDR Summons)	3.00	0.00	3.00	

Legal and Democratic

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
<u>ELECTORAL REGISTRATION</u>				
<u>Register Sales*</u>				
In data form				
- basic fee	20.00	0.00	20.00	Statutory Fixed Fees and not subject to any change
- for each 1,000 names or part thereof	1.50	0.00	1.50	Statutory Fixed Fees and not subject to any change
In printed form				
- basic fee	10.00	0.00	10.00	Statutory Fixed Fees and not subject to any change
- for each 1,000 names or part thereof	5.00	0.00	5.00	Statutory Fixed Fees and not subject to any change
<u>Marked Election Register Sales*</u>				
In data form				
- basic fee	10.00	0.00	10.00	Statutory Fixed Fees and not subject to any change
- for each 1,000 names or part thereof	1.00	0.00	1.00	Statutory Fixed Fees and not subject to any change
In printed form				
- basic fee	10.00	0.00	10.00	Statutory Fixed Fees and not subject to any change
- for each 1,000 names or part thereof	2.00	0.00	2.00	Statutory Fixed Fees and not subject to any change
Copy of return of Election expenses plus 20p per sheet, per side.	5.00	0.00	5.00	Statutory Fixed Fees and not subject to any change
<u>Miscellaneous Charges</u>		3.00%		
* Address labels printed	12.70	0.38	13.10	
* - for each 1,000 properties or part thereof	6.40	0.19	6.60	
- street list	12.70	0.38	13.10	
* - Data Property Addresses	23.10	0.69	23.80	
* - For each 1,000 properties or part thereof	1.70	0.05	1.80	
- Confirmation letter of registration	17.30	0.52	17.80	
* Plus Postage & Packaging at cost.				
<i>*This charge is determined by the Representation of the People Regulations 2001</i>				

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
LEGAL		3.00%		
- Legal work (per hour)	128.80	3.86	132.70	
- RTB	180.00	5.40	185.40	
- Consent for proposed works	141.50	4.25	145.70	
- Retrospective Consent	148.80	4.46	153.30	
Section 106:				
- Private Owner	481.50	14.45	495.90	
- Each additional unit added (up to a maximum of £1,500) *	60.30	1.81	62.10	
- Affordable housing schemes	903.80	27.11	930.90	
- Deed of Variation**	343.50	10.31	353.80	
- Fee for agreeing a unilateral undertaking	343.50	10.31	353.80	
<i>* Please note that for complex 106 agreements charges may be calculated based at the current hourly rate for legal work to reflect the time taken to complete the negotiations and drafting. Fees calculated under this provision may exceed £1,500</i>				
<i>**This new head of charge is required as variations to S106 agreements were rare but are becoming more frequent and this enables the charge to be published. The rate is the same as that for a similar type of planning agreement, for consistency.</i>				
Other Fees				
- Fees for sale of property under Low Cost Housing Scheme	236.90	7.11	244.00	
- Fees for purchase of additional 30% Share	154.50	4.64	159.10	
- Fees for preparation of Deed of postponement	100.90	3.03	103.90	
- Administration fee for the grant of licences for more than 12 months	56.70	1.70	58.40	
- Issuing of consents (transfer of mortgage)	67.00	2.01	69.00	
Minor land sales up to £10,000	0.00	0.00	475.00	This is a new head of charge not previously included as a fixed fee
Major Land sales £10,000+ 0.5% of purchase price with a minimum charge of £500	0.00	0.00	Fixed Fee	This is a new head of charge not previously included as a fixed fee
Major Land sales £50,000+ 0.5% of purchase price with a minimum charge of £750	0.00	0.00	Fixed Fee	This is a new head of charge not previously included as a fixed fee
- Diversion of footpath under section 257 of the Town and Country Planning Act	1,936.40	58.09	1,994.50	
LAND SEARCHES		3.00%		
Single Con29 Question				
Official Certificate of Search (LLC1) only	26.00	0.78	26.80	It is proposed that the search fees will not be increased on an overall general % increase as it would breach the charging regulations 2008, made under the LLC Act 1975, under which all charges have to be calculated
CON29R Enquiries of Local Authority (2007)				
- Residential	85.10	13.55	98.70	
- Commercial	126.00	14.78	140.80	BDC 30% Increase. Additional charged by WCC of £11 to reflect their response charge to the query
Standard Search Fee: LLC1 and CON 29R combined				
- Residential	111.00	14.33	125.30	
- Commercial	152.00	15.56	167.60	

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
CON 29O Optional enquiries of Local Authority (2007) (Questions 5,6,8,9,11,15) per question	12.00	0.36	12.40	Separate to reflect county fee on the question.
(Questions 7,10,12,13,14,16-21) per question	6.00	0.18	6.20	
(Question 22)	24.00	0.72	24.70	
Extra written enquiries (Refer to Worcestershire County Council for Highways enquiries)	47.00	1.41	48.40	
Question 4	12.00	1.36	13.40	
Each additional parcel of land (LLC1 and CON29R)	22.00	0.66	22.70	
Refresher Search	38.00	1.14	39.10	
Expedited (within 48 hrs)	30.00	0.90	30.90	

Business Transformation

Service Category	Proposed charge from 2016 £	% increase / £ increase £	Proposed charge from 2017 £	
<u>New Properties</u>		3.00%		
Naming and numbering new premises.	244.00	7.32	251.30	
Naming and numbering new premises.	121.00	3.63	124.60	
Additional Adjoining premises to the above	24.00	0.72	24.70	
Confirmation of address to solicitors/conveyancers/occupiers or owners	24.00	0.72	24.70	
Additional charge where this includes naming of a building (e.g. block of flats)	61.00	1.83	62.80	

Planning and Regeneration

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
<u>DEVELOPMENT CONTROL</u>		3.00%		
A0/A1 size print	14.40	0.43	14.80	
A2 size print	7.20	0.22	7.40	
<u>Development Management</u>		3.00%		
High Hedge Complaints	577.80	17.33	595.10	
High Hedge Complaints - reduced for people on benefits	230.70	6.92	237.60	
<u>Residential Development/ Development Site Area/Proposed Gross Floor Area</u>				
1-4 dwellings / less than 0.5 ha	297.70	8.93	306.60	
- Additional Meetings (after first three)	118.50	3.56	122.10	
5-9 dwellings / 0.6-0.99ha	598.40	17.95	616.40	
- Additional Meetings (after first three)	118.50	3.56	122.10	
10-49 dwellings / 1.0-1.25ha	1,194.80	35.84	1,230.60	
- Additional Meetings (after first three)	597.40	17.92	615.30	
50-199 dwellings / 1.26 - 2.0ha	2,389.60	71.69	2,461.30	
- Additional Meetings (after first three)	883.70	26.51	910.20	
200+ dwellings / more than 2ha	3,583.40	107.50	3,690.90	
- Additional Meetings (after first three)	1,194.80	35.84	1,230.60	

BUILDING CONTROL - APRIL 2017 - VAT AT 20%
Explanatory notes

1 Before you build, extend or convert a building to which the building regulations apply, you or your agent must submit a Building regulations application.
The charge you have to pay depends on the type of work, the number of separate properties, or the total floor area.
You can use the following tables with the current charges regulations to work out the charges. If you have any difficulties, please do not hesitate to call us.

2 The charges are as follows.
Category A: New domestic homes, flats or conversions etc.
Category B: Extending or altering existing homes
Category C: Any other project including commercial or industrial projects etc.

Individually determined fees are available for most projects. We would be happy to discuss these with you if you require.
In certain cases, we may agree that you can pay charges in instalments. Please contact us for further discussions.

3 Exemptions and reductions in charges.
a If your plans have been approved or rejected, you won't have to pay again if you resubmit plans for the same work which has not started, provided you resubmit with 3 years of the original application date.
b You don't have to pay charges if the work will provide access to a building or is an extension to store medical equipment or provide medical treatment facilities for a disabled person. In order to claim exemption, an application must be supported by appropriate evidence as to the nature of the disabled persons disability. In these regulations, a 'disabled person' is a person who is described under section 29(1) of the National Assistance Act 1948 (as extended by section 8(2) Mental Health Act 1959).

4 You have to pay VAT for all local authority Building Regulation charges, except for the regularisation charge. VAT is included in the attached fees.

Regularisation applications are available for cases where unauthorised building work was undertaken without an application. Such work can only be regularised where the work was undertaken after October 1985 and not within the last 6 months. The Authority is not obliged to accept Regularisation applications. Regularisation application fees are individually determined. Please contact us to discuss regularisation application fees.

6. Reversion applications. Where the control of a building project passes from a third party to the Council a reversion application will be required. Reversion application fees are individually determined.

Other information

- 1** These notes are for guidance only and do not replace Statutory Instrument 2010 number 0404 which contains the full statement of the law, and the Scheme of Recovery of Fees dated April 2014.
2 These guidance notes refer to the charges that you have to pay for building control services within North Worcestershire.

Telephone payments are accepted. Please contact the relevant payment centre with your address and card details:

Bromsgrove 01527 881402

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
<u>TABLE A: Standard Charges for the Creation or Conversion to New Housing</u>				
Application Charge	Please Ring for Quote		Please Ring for Quote	An increasing number of customers are aware of the obligation for local authority building control to provide project specific fees, which are now provided in virtually all cases. It is proposed to continue with provision of site specific fees in accordance with The Building (Local Authority Charges) Regulations 2010 as in previous years, however it is also now proposed to expand this to cover the remaining few fee categories where a fixed fee is currently published.
Regularisation Charge	Please Ring for Quote		Please Ring for Quote	
Additional Charge	Please Ring for Quote		Please Ring for Quote	
<u>TABLE B: Domestic Extensions to a Single Building</u>				
Garage Conversion to habitable room				
Application Charge	Please contact us		Please contact us	The number of applications received which fall within these final few categories amounts to around 5% of all applications.
Regularisation Charge	Please contact us		Please contact us	
Additional Charge	Please contact us		Please contact us	
Extension project up to 10sq.m floor area				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Additional Charge	Please contact us		Please contact us	
All Other extensions				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Additional Charge	Please contact us		Please contact us	
Loft Conversions				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Additional Charge	within provided quote		within provided quote	
Detached garage over 30sq.m floor area				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Additional Charge	Please contact us		Please contact us	

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
Electrical works by non-qualified electrician				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Renovation of thermal element				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Installing steel beam(s) within an existing house				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Window replacement				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
Installing a new boiler or wood burner etc.				
Application Charge	Please contact us		Please contact us	
Regularisation Charge	Please contact us		Please contact us	
<u>TABLE C: All Other works - Alterations</u>				
Application Charge	Please Contact Us		Please Contact Us	
Regularisation Charge	Please Contact Us		Please Contact Us	

For Office or shop fit outs, installation of a mezzanine floor and all other work where the estimated cost exceeds £50,000, please contact the Building Control Office on 01527 881402 for a competitive quote
These charges have been set on the following basis:

1. That the building work does not consist of, or include innovative or high risk construction techniques and / or duration of the building work from commencement to completion does not exceed 12 months
2. That the design and building work is undertaken by a person or company that is competent to carry out the relevant design and building work. If they are not, the building control service may impose supplementary charges.

Building Control – Supplementary Charges

If you are selling a property that has been extended or altered, you need to provide evidence to prospective purchasers that any relevant building work has been inspected and approved by a Building Control Body. That evidence is in the form of a Building Regulations Completion / Final Certificate and / or an Approval or Initial Notice (called the 'authorised documents' in the Home Information Pack Regulations). Legal entitlement to a Completion Certificate is subject to conditions. In cases where the Council is not told that building work is completed, or the building is occupied without addressing outstanding Building Regulation matters, a certificate is not issued. Despite the best efforts of the Council's Building Control Surveyors, many home owners who undertake building works fail to obtain a Completion Certificate and their application is archived. A fee is payable to re-open archived building regulations applications for the purposes of issuing a completion certificate.

Other charges are payable where we are asked to withdraw a Building Regulations application and refund fees, or asked to re-direct inspection fee invoices. Fees are payable in cleared funds before the release of any authorised documents or other actions listed below.

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
<u>PASSED</u> <u>ARCHIVED APPLICATIONS</u> Process request to re-open archived building control file, resolve case and issue completion certificate (Administration Fee) Each visit to site in connection with resolving archived building control cases (Per Site Visit) <u>WITHDRAWN APPLICATIONS</u> Process request <u>With additional fees of:</u> Withdraw Building Notice application where no inspections have taken place Withdraw Building Notice application where inspections have taken place Withdrawn Full Plans application without plans being checked or any site inspections being made Withdraw Full Plans application after plan check but before any inspections on site		3.00%		
	49.00	1.47	50.50	
	64.00	1.92	65.90	
	49.00	1.47	50.50	
	refund submitted fee less admin fee	0.00	refund submitted fee less admin fee	
	refund submitted fee less admin fee, less £65.90 per site visit made	0.00	refund submitted fee less admin fee, less £65.90 per site visit made	
	refund submitted fee less admin fee		refund submitted fee less admin fee	
	refund inspection fee (where paid up-front) less admin fee		refund inspection fee (where paid up-front) less admin fee	

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
Withdraw Full Plans application after plan check and after site inspections made	refund any paid inspection fee less admin fee, less £65.90 per site inspection made	0.00	refund any paid inspection fee less admin fee, less £65.90 per site inspection made	
<u>RE-DIRECT INSPECTION FEES / ISSUE COPY DOCUMENTS</u> Process request to re-invoice inspection fee to new addressee	49.00	1.47	50.50	
Optional Consultancy Services	Please Contact Us		Please Contact Us	
<u>*Charges Note*</u>				
Under the Building (Local Authority Charges) Regulations 2010 local authority building control is not permitted to make a profit or loss. The service is to ensure full cost recovery and no more. Any surplus or loss made against expenditure budgets is to be offset against the following years fees and charges setting. In addition, the level of competition from the private sector needs to continually defended against therefore it is proposed to curtail both the extent of the categories published and to make extensive use of the fact that legislation now allows local authorities to offer site specific quotations for building regulations applications. In addition expenditure of the service has reduced since the creation of a shared service resulting in a reduction in the hourly rate charged by the service.				

Regulatory Services

SERVICE CATEGORY	Agreed new charge 1st April 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
		0.00%		
<u>TAXI LICENSING</u>				
- Hackney Carriage - excluding vehicle testing	243.00	0.00	243.00	
- Hackney Carriage vehicle tests	64.00	0.00	64.00	
- Private Hire - excludes vehicle testing	225.00	0.00	225.00	
- Private Hire vehicle tests	54.90	0.00	54.90	
- Private Hire Operator 1 year	290.00	0.00	290.00	
- Private Hire Operator 5 year	1,102.00	0.00	1,102.00	
- HC/PH Drivers Licence - 1 year	92.00	2.76	95.00	
- HC/PH Drivers Licence - 3 year	220.80	7.20	228.00	
- Private Hire Drivers Licence - 1 year	92.00	2.76	95.00	
- Private Hire Drivers Licence - 3 year	220.00	7.20	228.00	
- Meter Test	23.00	0.69	24.00	
- Hackney Carriage mid-term vehicle test	64.00	0.00	64.00	
- Private Hire mid-term vehicle test	54.90	0.05	55.00	In line with recharge from depot

- Re-Test Fee - Within 48 hours	28.00	0.00	28.00	
- Knowledge test	20.00	0.60	21.00	
- Administration charge - new applications	35.00	0.00	35.00	In line with all County wide charges
SERVICE CATEGORY	Proposed charge from 2016	% increase/ £ increase	Proposed charge from 2017	Comments
	£	£	£	
- Replacement vehicle plate	20.00	0.60	21.00	increase due to full cost recovery.
- Replacement Driver's Licence	15.00	3.00%	16.00	increase due to full cost recovery.
- Trailer Test	20.00	0.00	20.00	In line with recharge from depot
- Transfer of ownership of licensed vehicle	35.00	3.00%	36.00	increase due to full cost recovery.
- Criminal Bureau Check	50.00	3.00	53.00	Increase of 6% to recover accurate costs based on time spent
- DVLA Check - Electronic	6.00	0.18	6.00	
- DVLA Check	11.00	0.33	11.00	
GENERAL LICENSING		0.00%		
Licensing Act 2003				
- Annual Street Trading Consent - Food - Initial - per annum	1,418.00	0.00	1,418.00	For a number of licensing fees officers are not proposing an increase to maintain charge comparable to neighbouring providers
- Annual Street Trading Consent - Food - Renewal - per annum	1,301.00	0.00	1,301.00	
- Annual Street Trading Consent - Non Food - Initial - per annum	1,183.00	0.00	1,183.00	At full cost of recovery
- Annual Street Trading Consent - Non Food - Renewal - per annum	1,064.00	0.00	1,064.00	
- Animal Boarding - Vet fees / animal welfare visit costs if applicable charged at cost	225.00	0.00	225.00	
- Dog Breeding establishments - Vet fees / animal welfare visit costs if applicable charged at cost	225.00	0.00	225.00	
- Dangerous wild animals - Vet fees / animal welfare visit costs if applicable charged at cost	225.00	0.00	225.00	
- Pet Shops - Vet fees / animal welfare visit costs if applicable charged at cost	225.00	0.00	225.00	
- Riding Est. - Vet fees / animal welfare visit costs if applicable charged at cost	225.00	0.00	225.00	
- Sex Establishments	979.00	0.00	979.00	3% to reflect costs
- Zoo - Vet fees / animal welfare visit costs if applicable charged at cost	97.10	2.91	100.00	
Tattooing/ ear piercing/ electrolysis/ acupuncture				
- Premises	125.00	0.00	130.00	
- Practitioners	82.00	0.00	85.00	
Scrap Metal Dealers Act 2013				
- Site Licence (New)	290.00	0.00	290.00	
Per Additional Site	150.00	0.00	150.00	
- Collectors Licence (New)	145.00	0.00	145.00	
- Site Licence (Renewal)	240.00	0.00	240.00	
Per Additional Site	150.00	0.00	150.00	
- Collectors Licence (Renewal)	95.00	0.00	95.00	
- Variation of Licence	65.00	0.00	65.00	
- Copy of Licence (if lost or stolen)	25.00	0.00	25.00	

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
ENVIRONMENTAL HEALTH				
Dog Warden				
Penalty* (statutory fee)	25.00	0.00	25.00	Statutory Charge - Legislation since 1992
Kennelling Fee - £13.50 per day or part day	12.00	1.50	13.50	An increase of 12% to reflect the cost recovery of the dog warden
Kennelling Fee for dangerous dogs by breed or behaviour - £16 per day or part day	-	0.00	16.00	An new charge to reflect costs associated with dangerous dogs
Admin charge	10.00	0.00	10.00	
Out of hours fee	30.00	0.90	31.00	3% increase
Repeat offenders fee	25.00	0.00	25.00	
*No charge for a first offence to those on income related means tested benefits				
Other Environmental Health Fees				
ISS Certs Condemned Food*	Full Cost Recovery		Full Cost Recovery	
Food Hygiene Basic Course fee	Full Cost Recovery		Full Cost Recovery	
Gambling Fees 16-17				
Premises Licence Fees - Discretionary				
Bingo Premises				
Application to vary	1,017.00	0.00	1,017.00	
Application to transfer	694.00	0.00	694.00	
New applications	2,029.50	0.00	2,029.50	
Annual fee	580.00	0.00	580.00	
Copy of licence	25.00	0.00	25.00	Statutory charge - cannot be above £25
Notification of change	50.00	0.00	50.00	Statutory charge - cannot be above £50
Reinstatement of licence	676.50	0.00	676.50	
Provisional statement	2,029.50	0.00	2,029.50	
Adult Gaming Centre				
Application to vary	870.00	0.00	870.00	
Application to transfer	694.00	0.00	694.00	
New applications	1,158.25	0.00	1,158.30	
Annual fee	580.00	0.00	580.00	
Copy of licence	25.00	0.00	25.00	Statutory charge - cannot be above £25
Notification of change	50.00	0.00	50.00	Statutory charge - cannot be above £50
Reinstatement of licence	676.50	0.00	676.50	
Provisional statement	1,158.25	0.00	1,158.30	
Family Entertainment Centre				
Application to vary	672.50	0.00	672.50	
Application to transfer	550.50	0.00	550.50	
New applications	1,158.25	0.00	1,158.30	
Annual fee	436.00	0.00	436.00	

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
Copy of licence	25.00	0.00	25.00	Statutory charge - cannot be above £25
Notification of change	50.00	0.00	50.00	Statutory charge - cannot be above £50
Reinstatement of licence	540.00	0.00	540.00	
Provisional statement	1,158.25	0.00	1,158.30	
Betting Premises (Excluding Track)				
Application to vary	870.00	0.00	870.00	
Application to transfer	694.00	0.00	694.00	
New applications	1,691.50	0.00	1,691.50	
Annual fee	348.50	0.00	348.50	
Copy of licence	25.00	0.00	25.00	Statutory charge - cannot be above £25
Notification of change	50.00	0.00	50.00	Statutory charge - cannot be above £50
Reinstatement of licence	676.50	0.00	676.50	
Provisional statement	1,691.50	0.00	1,691.50	
Track				
Application to vary	724.00	0.00	724.00	
Application to transfer	550.50	0.00	550.50	
New applications	1,411.50	0.00	1,411.50	
Annual fee	580.00	0.00	580.00	
Copy of licence	25.00	0.00	25.00	Statutory charge - cannot be above £25
Notification of change	50.00	0.00	50.00	Statutory charge - cannot be above £50
Reinstatement of licence	540.00	0.00	540.00	
Provisional statement	1,411.50	0.00	1,411.50	
Temporary use notices				
New applications	275.00	0.00	275.00	
Copy of licence	26.70	0.00	26.70	
Gambling Act Permit Fees - Statutory				
Licensed Premises Gaming Machine Permit				
Grant	150.00	0.00	150.00	Statutory charges
Existing operator grant	100.00	0.00	100.00	
Variation	100.00	0.00	100.00	
Transfer	25.00	0.00	25.00	
Annual Fee	50.00	0.00	50.00	
Change of name	25.00	0.00	25.00	
Copy of Permit	15.00	0.00	15.00	

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
<u>Licensed Premises Automatic Notification Process</u>				
Grant	50.00	0.00	50.00	
<u>Club Gaming Permits</u>				
Grant	200.00	0.00	200.00	
Grant (Club Premises Certificate holder)	100.00	0.00	100.00	
Existing operator grant	100.00	0.00	100.00	
Variation	100.00	0.00	100.00	
Renewal	200.00	0.00	200.00	
Renewal (Club Premises Certificate holder)	100.00	0.00	100.00	
Annual Fee	50.00	0.00	50.00	
Change of name	100.00	0.00	100.00	
Copy of Permit	15.00	0.00	15.00	
<u>Club Machine Permits</u>				
Grant	200.00	0.00	200.00	
Grant (Club Premises Certificate holder)	100.00	0.00	100.00	
Existing operator grant	100.00	0.00	100.00	
Variation	100.00	0.00	100.00	
Renewal	200.00	0.00	200.00	
Renewal (Club Premises Certificate holder)	100.00	0.00	100.00	
Annual Fee	50.00	0.00	50.00	
Copy of Permit	15.00	0.00	15.00	
Change of Name	25.00	0.00	25.00	
Transfer of Permit	25.00	0.00	25.00	
<u>Family Entertainment Centre Gaming Machine Permit</u>				
Grant	300.00	0.00	300.00	
Existing operator grant	100.00	0.00	100.00	
Change of name	25.00	0.00	25.00	
Renewal	300.00	0.00	300.00	
Copy of Permit	15.00	0.00	15.00	
<u>Prize Gaming Permits</u>				
Grant	300.00	0.00	300.00	
Existing operator grant	100.00	0.00	100.00	
Change of name	25.00	0.00	25.00	
Renewal	300.00	0.00	300.00	
Copy of Permit	15.00	0.00	15.00	
Transitional Application Fee	100.00	0.00	100.00	
<u>Small Lottery Registration (set by legislation)</u>				
Grant	40.00	0.00	40.00	
Annual fee	20.00	0.00	20.00	

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
Fee Licensing 2016/17- Statutory				
<u>The fee for a Personal Licence is £37.00</u>				
<u>Premises Licence and Club Premises Certificate</u>				
Non- Domestic rateable value of premises				
BAND A	0 - 4,300		0 - 4,300	Statutory charges
BAND B	4,301 - 33,000		4,301 - 33,000	
BAND C	33,001 - 87,000		33,001 - 87,000	
BAND D	87,001 - 125,000		87,001 - 125,000	
BAND E	125,001 and over		125,001 and over	
New applications and variations				
BAND A	100.00	0.00	100.00	
BAND B	190.00	0.00	190.00	
BAND C	315.00	0.00	315.00	
BAND D	450.00	0.00	450.00	
BAND E	635.00	0.00	635.00	
Public House Annual Fee				
BAND A	70.00	0.00	70.00	
BAND B	180.00	0.00	180.00	
BAND C	295.00	0.00	295.00	
BAND D	320.00	0.00	320.00	
BAND E	350.00	0.00	350.00	
Property not subject to non-domestic rates will fall into Band A. Properties, which have not yet been constructed will fall into band C.				
Those premises which fall into Band 'D' will be subject to two times the amount of fee payable as outlined above, whilst those premises which fall into Band 'E' will be subject to three times the amount of fee payable, if they are used exclusively or primarily for the carrying on of the retail of alcohol for consumption on the premises , i.e. large public houses.				
Large Events				
An additional fee will be charged where the maximum number of persons exceeds 5000 at a licensable event. Please contact the Licensing Section for further details.				
Exemptions				
Church Halls, Community Halls, Village Halls, or other similar building etc. are exempt from paying any fees for a premises licence authorising ONLY the provision of regulated entertainment. If the retail of alcohol is to be included in the Premises Licence, the full fee will be payable as outlined above.				

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
No fees are payable by an educational institution, such as a school or a college (whose pupils/students have not attained the age of 19) for a premises licence authorising ONLY the provision of regulated entertainment providing that is for and on behalf of the educational institution.				
Application for copy of licence or summary on theft, loss etc.	10.50	0.00	10.50	
Notification of change of name or address (holder of premises licence)	10.50	0.00	10.50	
Application to vary the Designated Premises Supervisor	23.00	0.00	23.00	
Application to transfer a premises licence	23.00	0.00	23.00	
Interim authority notice following death etc. of licence holder	23.00	0.00	23.00	
Right of freeholder etc to be notified of licensing matters	21.00	0.00	21.00	
Application for making of a provisional statement	315.00	0.00	315.00	
Application for copy of certificate or summary on theft, loss etc.	10.50	0.00	10.50	
Notification of change of name or alteration of club rules	10.50	0.00	10.50	
Change of relevant registered address of club	10.50	0.00	10.50	
Temporary Event Notices	21.00	0.00	21.00	
Application for copy of licence on theft, loss etc. of temporary event notice	10.50	0.00	10.50	
Application for copy of licence on theft, loss etc. of personal licence	10.50	0.00	10.50	
Notification of change of name or address (Personal Licence)	10.50	0.00	10.50	
Notice of interest in any premises	21.00	0.00	21.00	
Minor variation application	89.00	0.00	89.00	
Should you need assistance in determining which level of fee you are required to pay, please contact the Licensing Section on (01527) 881473 or (01527) 881626. Alternatively email - licensing@bromsgrove.gov.uk In all cases, cheques must be made payable to 'Bromsgrove District Council'				

Community Services

SERVICE CATEGORY	charge 1st April 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
STRATEGIC HOUSING		3.00%		
Homeless persons' hostels				
- Single room	9.00	0.27	9.30	
- Heating	0.60	0.02	0.60	
- Two single rooms	13.90	0.42	14.30	
- Heating	1.40	0.04	1.40	
- Double room	13.90	0.42	14.30	
- Heating	1.40	0.04	1.40	
- More than one double room	19.00	0.57	19.60	
- Heating	2.10	0.06	2.20	
Bed and breakfast				
- Single room	14.80	0.44	15.20	
- Two single rooms	29.70	0.89	30.60	

SERVICE CATEGORY	charge 1st April 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
- Double room - More than one double room - Breakfast - adult - child - Storage of effects (per night) - RTB Plan Preparation for BDHT	14.80 19.10 2.20 1.80 2.30 112.80	0.44 0.57 0.07 0.05 0.07 3.38	15.20 19.70 2.30 1.90 2.40 116.20	
Private Sector Housing Housing Fitness Inspections Registration of housing in multiple occupation: per occupant - first property per occupant - subsequent property Service and Administration of Improvement Prohibition, Hazard Awareness or Emergency Measures Notices * under Housing Act 2004 Enforcement of Statutory Notices, Supervision of Work in Default etc. - Valuation Fee (relating to properties of 30% ownership)	111.20 91.70 79.30 25.80 per hour + 10% Admin charge per Notice Actual + 10% Admin charge 133.90	3.00% 3.34 2.75 2.38 0.77 4.02	114.50 94.50 81.70 26.60 per hour + 10% Admin charge per Notice Actual + 10% Admin charge 137.90	
*Based on salary of employee				
LIFELINE - Installation Fee - Lifeline (per week)	35.00 3.70	3.00% 1.05 0.11	36.00 3.80	All products are VAT free due to VAT relief exemptions.
HIRE PRODUCTS Hire of smoke alarm per week CO2 Detector per week Bogus Caller Panic Button Flood Detector Falls Detector Additional pendant Temperature extreme sensor	1.20 1.20 1.20 1.20 1.20 1.20 1.20	3.00% 0.04 0.04 0.04 0.04 0.04 0.04	1.25 1.25 1.25 1.25 1.25 1.25 1.25	

Customer Access & Financial Support
Scale of Proposed Charges

SERVICE CATEGORY	charge 1st April 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
Customer Services Interview Rooms (based at Service Centre Max 6 persons in room) - Per full day (9am - 5pm) - Per half day 9am-1pm/1pm-5pm) - Per hour (1full hour only)	42.40 26.50 9.00	3.00% 1.27 0.80 0.27	43.70 27.30 9.30	

Environmental Services

SERVICE CATEGORY	charge 1st April 2016	% increase/ £ increase	Proposed charge from 2017	Comments
	£	£	£	
Parking Fines PCN's On Street				No increase proposed
Certain Contraventions	70.00	0.00	70.00	
If paid within fourteen days	35.00	0.00	35.00	
Other contraventions	50.00	0.00	50.00	
If paid within fourteen days	25.00	0.00	25.00	
<i>These charges will increase if the charge remains unpaid after the 28 days given on the NTO (Notice to Owner)</i>				
Parking Fines PCN's Off Street				
Certain Contraventions	70.00	0.00	70.00	
If paid within fourteen days	35.00	0.00	35.00	
Other contraventions	50.00	0.00	50.00	
If paid within fourteen days	25.00	0.00	25.00	
<i>These charges will increase if the charge remains unpaid after the 28 days given on the NTO (Notice to Owner)</i>				
Car Park charges only apply between 8.00am to 10.00pm everyday				
CEMETERY		3.00%		
Interments in a grave				
- children aged under 1 year	FREE		FREE	Change to the age banding 1 year to 17 years inc to bring more in line with the child v adult legal ages. Currently we have only had 1 child burial (under 17) within Bromsgrove since April which was a resident 1 year to 17 years as above (no none resident butials of children since April)
- children aged under 1 year (non resident)	103.00	3.00	106.00	
- children aged 1 year - 16 years	FREE		FREE	
- children aged 1 year - 16 years (non resident)	149.40	4.60	154.00	
- persons aged 17 and over	463.50	126.50	590.00	
Change age to 18 years and over as per the notes for child burials. 20% increase will allow for the remove of oversize coffin fee as the standard size is increasing and is charged in a regular basis. Finally the triple fee option proposed to be removed as only charged twice in the last 12 months. This this new fee structure it will generate extra income whilst making the service more accessible to all N.B. This is still being well below the west midlands average.				
Interment in a bricked grave				
Interment of cremated remains	190.60	5.42	196.00	proposed 17 years and under to bring in line with full burials
Interment of Cremated Remains (under 16 years no residents only)	70.00	2.00	72.00	
Scattering cremated remains in grave	80.00	2.00	82.00	
Exclusive rights of burial (75-year grants)				
- adult grave space	1,236.00	249.00	1,485.00	20% increase will allow for the remove the triple fee option proposed to be removed as only charged twice in the last 12 months. This this new fee structure it will generate extra income whilst making the service more accessible to all N.B. This is still being well below the west midlands average.

SERVICE CATEGORY	charge 1st April 2016	% increase/ £ increase	Proposed charge from 2017	Comments
- child grave space	262.60	8.40	271.00	20% increase will allow for the remove the triple fee option proposed to be removed as only charged twice in the last 12 months. This new fee structure it will generate extra income whilst making the service more accessible to all N.B. This is still being well below the west midlands average.
- cremated remains plot	473.80	94.20	568.00	
Renewal of expired deed (single fee charged in all cases)				
-Burial	412.00	12.00	424.00	
-Cremated remains	159.70	5.30	165.00	
-Adult sized grave purchased in reserve	N/A		N/A	20% increase will allow for the remove the triple fee option proposed to be removed as only charged twice in the last 12 months. This this new fee structure it will generate extra income whilst making the service more accessible to all N.B. This is still being well below the west midlands average.
	566.50	112.50	679.00	
-Ashes grave purchased in reserve				
- Disinterment of Remains - Cremated Remains	257.50	258.50	516.00	increase to cover full cost recovery
- Wooden cremated remains casket	92.70	0.00	90.00	reduced to reflect lower costs in purchasing
Memorials				
-Memorial permit (North Bromsgrove Cemetery only)	0.00	0.00	0.00	
- Memorial application administration fee	92.70	3.30	96.00	
Bench with 10 year lease & top rail engraving (max 40 letters) - £800.00	0.00	0.00	800.00	
Bench with 10 year lease & standard silver plaque (max 60 letters) - £760.00	0.00	0.00	760.00	
Bench replacement plaque - £110.00	0.00	0.00	110.00	
-Assignment / Transfer of Exclusive Right of Burial	41.20	54.80	96.00	raised in line with memorial processing due to officer processing time
Exhumation Ground works	0.00	0.00	196.00	New charge
New Container	0.00	0.00	90.00	New charge
Officer time	0.00	0.00	200.00	New charge
Cremator usage	0.00	0.00	30.00	New charge
Certified copy of entry	20.60	0.40	21.00	
Bird bath memorial (new memorial option)				
5 Year Lease				
- size 1 (small)	185.40	5.56	191.00	
- size 2	206.00	6.18	212.20	
- size 3	226.60	6.80	233.40	
- size 4	247.20	7.42	254.60	
- size 5 (large)	267.80	8.03	275.80	
10 Year Lease				
- size 1 (small)	288.40	8.65	297.10	
- size 2	309.00	9.27	318.30	
- size 3	329.60	9.89	339.50	

- size 4	350.20	10.51	360.70	
- size 5 (large)	370.80	11.12	381.90	
SERVICE CATEGORY	charge 1st April 2016	% increase/ £ increase	Proposed charge from 2017	Comments
20 Year Lease				
- size 1 (small)	391.40	11.74	403.10	
- size 2	412.00	12.36	424.40	
- size 3	432.60	12.98	445.60	
- size 4	453.20	13.60	466.80	
- size 5 (large)	473.80	14.21	488.00	
Motif	103.00	3.09	106.10	
The option to purchase a full adult plot in reserve has been withdrawn to allow the burial of those who wish to bury their loved one because they have died due to lack of spaces available.				
REFUSE COLLECTION		0.00%		Trade waste charges are being fully reviewed and will be included in a report that will go to the same meeting as the fees and charges report.
Bulky Household Waste				
Proposed Charges		3.00%		
It is proposed that the following charges are trialled for the next year whilst we continue to learn more about the customers' nominal value whilst continuing to improve operational efficiency. The charges would be the same across Bromsgrove and /Redditch.				
Bulky collection - single unit*	8.00	0.24	8.20	
Bulky collection - two unit*	16.00	0.48	16.50	
Bulky collection - three unit* (reduced rate for 3 unit)	21.10	0.63	21.70	
10 black bags	21.10	0.63	21.70	
*Depending on size items maybe charged for as a multiple of units				
Bulky collection - three items or more	Quotation		Quotation	
Item inside house or garage	Quotation		Quotation	
The items below to be quoted for independently depending on size, and weight and position of collection point				
- Garden Shed	Quotation		Quotation	
- Piano	Quotation		Quotation	
- Chest Freezer	Quotation		Quotation	
- Large Cookers (Ranges)	Quotation		Quotation	
				At present we charge per item however, the size of an item has a bearing on the amount of work needed to remove and dispose of it. Therefore we are suggesting a change to a unit price where certain items will be made up of a number of units i.e. an under the counter fridge would be 1 unit where as a larger fridge freezer would be 2 units, etc.

- Green houses SERVICE CATEGORY	Quotation charge 1st April 2016	% increase/ £ increase	Quotation Proposed charge from 2017	Comments
- Hazardous oils (Special Collections) because of the distance to dispose of them correctly. - Over 10 x black bags - Wheels, Tyres and other car parts	Quotation Quotation Quotation		Quotation Quotation Quotation	
Items that are classed by WCC as non domestic waste Litter and Dog Bins (Yearly Charge) High Usage Site First Bin High Usage Site Additional Bins (each) Medium Usage Site First Bin Medium Usage Site Additional Bins (each) Low Usage Site First Bin Low Usage Site Additional Bins (each)			Quotation 1,040.00 442.00 520.00 221.00 260.00 110.50	New Charge - The County Council now treats certain household and garden items as non domestic waste and there a disposal charge is payable on these items/loads as well as the usual charge for collection. Change from rigid level of service to a more flexible model based on Place Working. Tailored service to level of need on site, which will give Parishes greater security in standard of the site at peak periods of use. 3 levels of service based on site usage in order to reflect the level of work expected. Overall prices will not change for the majority of existing Parishes, with one parish seeing a £25 reduction, and one a £20 increase.
Investigation of Abandoned Vehicles on Private Land Per Vehicle			60.00	New Discretionary Fee - Applied where the landowner cannot demonstrate that they have taken reasonable steps to identify the owner or make people aware that action may be taken to remove it, and so BDC has to do this. Ref large number of false reports of abandoned vehicles on private land over last two years.
Mecanically Sweep Private Road / Car Park - Mini Sweeper per Hour Mecanically Sweep Private Road / Car Park - HGV Sweeper per Hour	0.00 0.00	0.00 0.00	30.00 50.00	New New
Garden Waste Collection Service * For larger bulky items such as garden sheds please contact us regarding the charge for this as prices may vary depending on size and quantity	40.00	1.20	42.00	Charge of £42 already agreed for 2017 collections. Members need to agree the price for 2018 collections £45
<u>CESSPOOL EMPTYING Fees for contract customers effective 1st Oct-30th Sept to tie in with contract period</u>				Officers to be authorised to vary prices by +/- 25%to enable us to attract/keep business or deal with difficult to empty properties
Per 4,500 litres or part thereof				We have changed the pricing structure to try and develop the service.N.B. we should not be publishing these prices due to our competitors
Pre booked customers - 0 - 15 pipes On demand customers - 0 - 15 pipes Additional charge for attendance within 48hrs	136.40 0.00 60.00	0.00 0.00 15.00	125.00 140.00 75.00	
Additional charges for laying pipes				
16 - 24 pipes 25+ pipes or Two operative job	47.10 0.00	2.90 0.00	50.00 75.00	

Persons in receipt of housing benefit pay only 25% of the above charge for emptying after their second in the same financial year (1st April - 31st March)

Leisure Services

SERVICE CATEGORY	Proposed charge from 2016 £	% increase/ £ increase £	Proposed charge from 2017 £	Comments
<u>SPORTS DEVELOPMENT</u>		5.00%		Following a review of competitors and other providers costs F&Cs are proposed to increase above the standard 3% increase to reduce the deficit funding provided to the current activity programme and to allow additional services to be developed and implemented at no extra cost to BDC.
Community exercise class	3.00	0.15	3.15	
Specialised health class	3.00	0.15	3.15	
Primary Sports Project	19.60	12.50%	22.05	Price increased by 12.5% which equates to an increase of 15p per pupil.
After school session	21.50	2.69	24.20	Price increased by 12.5% which equates to an increase of 15p per pupil.
			0.00	
Sports Specific Coaching (Adults)	4.90	5.00%	5.15	
Inclusive activities	2.80	7.00%	0.05	Increased by 7% to bring the charge in line with other targeted activity programmes i.e. PSI.
Adult Coach Session (requires facility hire)	3.60	5.00%	3.80	
Holiday club rate	2.20	0.11	2.30	
		15.00%		
Concessionary holiday club rate (free school dinners)	1.00	0.15	1.15	Price is set at 50% of above rate and tracks the non concession price. This will mean respective % price increase is higher but the pricing point remains as per previous decisions made by members.
		5.00%		
Junior Sport Specific Holiday club / sport session	2.50	0.13	2.65	
Multi Skills clubs	2.20	0.11	2.30	
Activity referral	25.80	1.29	27.10	
		0.00%		
PSI Falls Prevention	3.00	0.00	3.00	It is not possible to increase the fees in this area as it is a commissioned service at a fixed pricing point.
<u>SANDERS PARK</u>		6.00%		
Tennis Courts (per court per Hour)				Based on customer feedback, benchmarking and usage analysis a new pricing structure has been proposed for introduction to reflect the average duration of a game and to allow users to complete a match at a more cost effective rate. As such half hour charge is removed and a revised charge of 1.5hrs introduced.
- Adult	7.10	0.43	7.55	
- Adult & Junior	6.20	0.37	6.60	
		-10.00%		

Appendix

- Junior/Senior Citizen	5.60	-0.56	5.05	Price decreased to offer better value for targeted groups to increase holiday and off peak usage. Price set by applying 33% discount to the adult price.
SERVICE CATEGORY	Proposed charge from 2016	% increase/ £ increase	Proposed charge from 2017	Comments
	£	£	£	
Tennis Courts (per court per 1 and 1/2 Hour)				
- Adult	3.60	n/a	n/a	Delete former half hour charge
- Adult	n/a	n/a	11.00	New charge 1.5hrs
- Adult & Junior	3.10	n/a	n/a	Delete former half hour charge
- Adult & Junior	n/a	n/a	9.50	New charge 1.5hrs
- Junior/Senior Citizen	2.80	n/a	n/a	Delete former half hour charge
- Junior/Senior Citizen	n/a	n/a	8.50	New charge 1.5hrs
		6.00%		Price increase above 3% level based on cost analysis of other similar activities within the area and in order to move towards full cost recovery.
Bowls				
- Adult (per hour)	7.40	0.44	7.85	
- Junior (per hour)	4.00	0.24	4.25	
- Senior Citizen (per hour)	5.10	0.31	5.40	
		0.00%		
- Adult (season ticket)	63.00	0.00	63.00	Price frozen to increase opportunity for additional sales and usage.
- Junior (season ticket)	34.10	0.00	34.10	Price frozen to increase opportunity for additional sales and usage.
- Senior Citizen (season ticket)	45.90	0.00	45.90	Price frozen to increase opportunity for additional sales and usage.
Bromsgrove Town Bowling Club		6.00%		
- for season (exclusive use on present basis)	3,008.20	180.49	3,188.70	
- additional use, other days (per rink)	27.20	1.63	28.85	
		3.00%		Charges increased in line with corporate approach to reflect current market for pitches and the issues faced with team generation rates within the local leagues and feedback from hirers on the current low attendances for fairs.
OTHER RECREATION GROUNDS AND OPEN SPACES				
Football Pitch (without changing facilities)				
- adult (per game)	30.60	0.92	31.50	
- junior (per game)	18.60	0.56	19.20	
Changing Facilities				
- adult	43.90	1.32	45.20	
- junior	22.50	0.68	23.20	
Boleyn Road, Frankley				
- fairs (per day)	460.00	13.80	473.80	
- deposit	2,103.60	63.11	2,166.70	
Market Street Recreation Ground		4.00%		
- fairs (per day)	459.00	18.36	477.35	
- deposit	2,103.60	84.14	2,187.75	
One free day is allowed for each of the above bookings by fairs/circuses. Other hiring's – charge to be decided at the time of application.				
ALLOTMENTS		5.00%		Prices increased by 5% to reflect the current low pricing point and excellent value for money the service provided with an average plot holder [1/16 plot] generating £1.4K worth of produce (Based on NSLAG stats) per annum.

(Charge is for October 2014 - September 2015) - Rent per acre equivalent to 0.404685 hectares - Rent per 3/4 acre equivalent to 0.303514 hectares	1,038.10 697.10	51.91 34.86	1,090.00 731.95	
SERVICE CATEGORY	Proposed charge from 2016	% increase/ £ increase	Proposed charge from 2017	Comments
- Rent per 1/2 acre equivalent to 0.202342 hectares - Rent per 1/4 acre equivalent to 0.101171 hectares - Rent per 1/16 acre equivalent to 0.25529 hectares - Rent per 1/32 acre equivalent to 0.01264 hectares	413.70 190.10 43.70 30.60	20.69 9.51 2.19 1.53	434.40 199.60 45.90 32.15	
<u>Bromsgrove Outdoor Events & Outdoor Fitness– Hire of Parks and Open Spaces</u> <u>£250 - £1500 Bond Payable</u> <u>Events</u> <u>Commercial Rates</u> Small Attendance = 0 to 99 Per Hour Per Day Medium Attendance = 100 to 499 Per Hour Per Day Large Attendance = 500 to 1999 Per Hour Per Day Community Rates Small Attendance = 0 to 99 Per Hour Per Day Medium Attendance = 100 to 499 Per Hour Per Day Large Attendance = 500 to 1999 Per Hour Per Day Charities / Not For Profit Organisations Small Attendance = 0 to 99 Per Hour Per Day Medium Attendance = 100 to 499 Per Hour Per Day Large Attendance = 500 to 1999 Per Hour Per Day Fairs & Circuses Min of 3 day Hire Small Attendance = 0 to 99 Per Day		3.00%		Charges increased in line with corporate approach to reflect the demand currently experienced.
	50.50 246.20 65.90 328.60 83.40 411.00 20.60 96.80 25.80 123.60 30.90 151.40 14.40 69.00 17.50 83.40 22.70 110.20 383.20	1.52 7.39 1.98 9.86 2.50 12.33 0.62 2.90 0.77 3.71 0.93 4.54 0.43 2.07 0.53 2.50 0.68 3.31 11.50	52.00 253.60 67.90 338.45 85.90 423.35 21.20 99.70 26.55 127.30 31.85 155.95 14.85 71.05 18.00 85.90 23.40 113.50 394.70	

		0.00%		A new pricing structure proposed based on buoyancy within the market, impact on the areas that are being used, customer feedback and to aid officers in providing a broader product line to attract new business. The breakdown of usage has changed to show different maximum number of days per summer, winter or annual use so charges are in line with participation numbers.
SERVICE CATEGORY	Proposed charge from 2016	% increase/ £ increase	Proposed charge from 2017	Comments
Outdoor Fitness Session				
Commercial Rates (Per Day)				
Summer Fee (Apr to Sept)	383.20	n/a	n/a	No Longer applicable
Winter Fee (Oct to Mar)	164.80	n/a	n/a	No Longer applicable
Annual Fee	467.60	n/a	n/a	No Longer applicable
Community Rates (Per Day)				
Summer Fee (Apr to Sept)	274.00	n/a	n/a	No Longer applicable
Winter Fee (Oct to Mar)	83.40	n/a	n/a	No Longer applicable
Annual Fee	328.60	n/a	n/a	No Longer applicable
Commercial Rates (Per Day)		4.50%		
Summer Fee (Apr to Sept) One day maximum usage per week	383.20	17.24	400.45	Reflects a more balanced offer to the commercial operator
Summer Fee (Apr to Sept) Two days maximum usage per week	n/a	n/a	650.00	New fee designed to reflect increase usage patterns
Summer Fee (Apr to Sept) Three days maximum usage per week	n/a	n/a	700.00	New fee designed to reflect increase usage patterns
		-27.00%		
Winter Fee (Oct to Mar) One day maximum usage per week	274.00	-73.98	200.00	Reduced fee to stimulate opportunities for commercial development during difficult trading periods
Winter Fee (Oct to Mar) Two days maximum usage per week	n/a	n/a	400.00	New fee designed to reflect increase usage patterns but lower levels of participation in winter months.
Winter Fee (Oct to Mar) Three days maximum usage per week	n/a	n/a	600.00	New fee designed to reflect increase usage patterns but lower levels of participation in winter months.
Annual Fee One day maximum usage per week	n/a	n/a	520.00	New fee to increase options to hirers and reflect full year commitment
Annual Fee Two days maximum usage per week	n/a	n/a	850.00	New fee to increase options to hirers and reflect full year commitment
Annual Fee Three days maximum usage per week	n/a	n/a	1000.00	New fee to increase options to hirers and reflect full year commitment
Community Rates (Per Day)		-27.00%		
Summer Fee (Apr to Sept) One day maximum usage per week	274.00	-73.98	200.00	Reduced fee to stimulate opportunities for community development
Summer Fee (Apr to Sept) Two days maximum usage per week	n/a	n/a	300.00	New fee reflecting increased usage
Summer Fee (Apr to Sept) Three days maximum usage per week	n/a	n/a	350.00	New fee reflecting increased usage
Winter Fee (Oct to Mar) One day maximum usage per week	n/a	n/a	80.00	Reduced fee to stimulate opportunities for community development
Winter Fee (Oct to Mar) Two days maximum usage per week	n/a	n/a	200.00	New fee reflecting increased usage but lower attendances in winter
Winter Fee (Oct to Mar) Three days maximum usage per week	n/a	n/a	300.00	New fee reflecting increased usage but lower attendances in winter
Annual Fee One day maximum usage per week	n/a	n/a	250.00	New fee to increase options to hirers and reflect full year commitment
Annual Fee Two days maximum usage per week	n/a	n/a	450.00	New fee to increase options to hirers and reflect full year commitment
Annual Fee Three days maximum usage per week	n/a	n/a	500.00	New fee to increase options to hirers and reflect full year commitment
Trial fee (1 day per week - MAX 4 week trial)	n/a	n/a	100.00	New fee to incentivise the opportunity an allow short term trails to maximise options in these areas.
Additional Costs for Outdoor Event Space:				
Ø Set up and Clearance charged @ 50% of applicable rate				
Ø Any event in excess of 1999 attendees is STN				
Additional Costs for Outdoor Fitness Space:				
Ø Set up and Clearance charged @ 50% of applicable rate				

SERVICE CATEGORY	Proposed charge from 2016	% increase/ £ increase	Proposed charge from 2017	Comments
<u>BROMSGROVE DISTRICT COUNCIL - PARKSIDE SUITE</u>				
<u>Scale of Charges from 2015</u>				
<u>Per Hour (Suggest min Hire of 2hrs)</u>				
Main Room				
Community Group	20.00	1.00	21.00	Prices increase 5% - (based on better offer of room from Spadesbourne Suite including improved offer) as above as above
Regular Hire	30.00	1.50	31.50	
Commercial Hire	40.00	2.00	42.00	
Committee Room				
Community Group	10.00	1.00	11.00	Price increased by 10% (Standards in the Committee Room warrant a higher rate than originally charged) as above as above
Regular Hire	15.00	1.50	16.50	
Commercial Hire	20.00	2.00	22.00	
Combined				
Community Group	25.00	1.88	26.90	7.5% based on the Hall and Committee room increase above - with discount for booking both rooms as above as above
Regular Hire	40.00	3.00	43.00	
Commercial Hire	55.00	4.13	59.15	
<u>Half Day up to 5pm (max 4hrs)</u>				
Main Room				
Community Group	75.00	3.75	78.75	5% (based on better offer of room from Spadesbourne Suite including high quality AV equipment) as above as above
Regular Hire	90.00	4.50	94.50	
Commercial Hire	150.00	7.50	157.50	
Committee Room				
Community Group	30.00	3.00	33.00	Price increased by 10% (Standards in the Committee Room warrant a higher rate than originally charged) as above as above
Regular Hire	40.00	4.00	44.00	
Commercial Hire	50.00	5.00	55.00	
Combined				
Community Group	90.00	6.75	96.75	7.5% based on the Hall and Committee room increase above with discount for booking both rooms as above as above
Regular Hire	125.00	9.38	134.40	
Commercial Hire	180.00	13.50	193.50	
<u>Full Day Up to 5pm</u>				
Main Room				
Community Group	140.00	7.00	147.00	5% (based on better offer of room from Spadesbourne Suite including high quality AV equipment) as above as above
Regular Hire	175.00	8.75	183.75	
Commercial Hire	250.00	12.50	262.50	

SERVICE CATEGORY	Proposed charge from 2016	% increase/ £ increase	Proposed charge from 2017	Comments
Committee Room Community Group Regular Hire Commercial Hire	50.00 60.00 75.00	10.00% 5.00 6.00 7.50	55.00 66.00 82.50	Price increased by 10% (Standards in the Committee Room warrant a higher rate than originally charged) as above as above
Combined Community Group Regular Hire Commercial Hire	180.00 225.00 300.00	7.50% 13.50 16.88 22.50	193.50 241.90 322.50	7.5% based on the Hall and Committee room increase above with discount for booking both rooms as above as above
<p style="text-align: center;"><u>Combined Evening Commercial Hire, Fridays and Saturday's, 5pm - Midnight</u></p> <p style="text-align: center;">Only half day and full day rates allowed for weekends. No hourly rates.</p> <p style="text-align: center;">All day rate for weddings £720** (day and evening to include kitchen and set up) 9am – 12 midnight</p> <p style="text-align: center;">Sunday hire rates by negotiation.</p> <p>Prices for current users of the Spadesbourne Suite will be held for 12mths as part of the transition arrangements</p> <p>Room 54(Training Room) - Any internal county organisations whom wish to use this room will be charged £25.00 per hour.</p>	400.00	10.00% 40.00	440.00	Price increased by 10% - weekend overtime costs for caretaking plus additional weekend clean(Standards in the Committee Room warrant a higher rate than originally charged)

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Bromsgrove District Plan 2011 – 2030 Adoption

Relevant Portfolio Holder	Councillor Kit Taylor
Portfolio Holder Consulted	Yes
Relevant Head of Service	Ruth Bamford
Ward(s) Affected	All Wards
Ward Councillor(s) Consulted	Yes
Non Key Decision	Yes

1. SUMMARY OF PROPOSALS

- 1.1 The Bromsgrove District Plan 2011-2030 (BDP) has now been through its Examination in Public which closed on the issuing of the Inspector's report, on the 16th of December 2016. The Inspector's report recommends that subject to the making of a series of modifications the BDP satisfies the requirements of section 20(5) of the Planning and Compulsory Purchase Act 2004, and the criteria for soundness in the National Planning Policy Framework, and is therefore sound.
- 1.2 This report explains the processes around the final stages of the plan production and asks the Council to formally adopt the BDP as the Development Plan for the District.

2. RECOMMENDATIONS

2.1 The Cabinet is asked to RECOMMEND to the Council

- 1. That the Council note the content of the Bromsgrove District Plan Planning Inspectorate's Report (Appendix 1), and the associated Schedule of Main Modifications (Appendix 2).**
- 2. That the Council adopt the Bromsgrove District Plan 2011 - 2030 as submitted and subsequently amended by the modifications set out in the Appendix 2 and Appendix 3 of this report.**
- 3. That the Council adopt the Policies Map which accompanied the submission version of the Bromsgrove District Plan and remains unchanged as a result of the examination process.**
- 4. That the Council note the Bromsgrove District Plan adoption statement, and Strategic Environmental Assessment (SEA) and Sustainability Appraisal Adoption Statement which forms Appendices 4 and 5 of this report.**
- 5. That the Head of Planning and Regeneration be delegated authority to undertake further minor editorial changes deemed necessary in**

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preparing the adopted District Plan for publication, following consultation with the portfolio holder for Planning.

3. KEY ISSUES

Financial Implications

- 3.1 The direct financial implications of adopting the plan are minimal and only relate to the requirement to place notices of the adoption in the local press, and to have copies of the documents available for inspection. There could be indirect costs associated with not adopting the BDP i.e. more planning appeals to defend or if the adopted BDP is challenged (see section 3.4 below) although it is not possible at this stage to identify what these costs may be.

Legal Implications

- 3.2 The relevant legislation setting out the processes around preparing and subsequent adoption of Local Plans is contained in the Planning and Compulsory Purchase Act 2004 as amended (PCPA 2004) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The Sustainability Appraisal (SA) has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004

- 3.3 If the BDP is adopted in line with the above regulations the following will be made available,

- The BDP
- An adoption statement
- The Sustainability Appraisal report and SA/SEA Adoption Statement
- Details of where the BDP as adopted is available for inspection and the places and times at which it can be inspected

The Council is also required to send a copy of the adoption statement

- to any person who has asked to be notified of the adoption of the BDP and to
- The Secretary of State.

- 3.4 Any person who is aggrieved by the adoption of the BDP may make an application to the High Court under section 113 of the Planning and Compulsory Purchase Act 2004 on the grounds that:

- the document is not within the appropriate power
- a procedural requirement has not been complied with

Any such application must be made promptly and in any event no later than 6 weeks after the date on which the BDP was adopted ie no later than 9th March 2017.

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Service / Operational Implications

The Evolution of the BDP

- 3.5 The evolution of the BDP has been a lengthy process and has been documented in many reports to the Council in the preceding years. A significant amount of time and effort from a wide range of stakeholders has gone into ensuring the plan reflects as many views of what planning should be in the District as possible. All this work culminated in September 2013 when the BDP Proposed Submission version was approved by the Council for Publication. Following a period of representations the BDP was then submitted to the Planning Inspectorate on the 12th March 2014 which marked the beginning of the Examination in Public (EIP) proceedings. The Planning Inspectorate appointed Mr Michael J Hetherington BSc (Hons) MA MRTPI MCIEEM to carry out the EIP.

The Examination in Public and Main Modifications

- 3.6 The EIP into the BDP which was also held, in part, jointly with Redditch Borough Council due to the Cross boundary growth element of the plan, began in June 2014. Since then there have been a number of challenges in the EIP which were documented in the report to the Cabinet on the 4th July 2016, which also considered the Inspector's proposed Main Modifications.
- 3.7 As detailed in that report the Main Modifications consultation ran for an extended period over the summer to account for the summer holiday period, the consultation began on the 27th July and ran to the 21st September. During this period a total of 49 representations were received. Even though a guidance note was produced asking for specific information in the responses, half of the responses did not specify which proposed Main Modification the response was in connection with. Irrespective of this fact all the responses were passed onto the Inspector for his consideration. The Inspectorate sent the fact checking report to the authority on the 2nd December. This version of the report provided a two week opportunity to identify any factual errors and to seek clarification on any conclusions that were unclear. It did not provide any scope to question conclusions. The final report was issued on Friday 16th December 2016, this concluded the examination in public. The Inspector's report was then placed on the Council's website site and notification letters sent to all those who wished to be notified on Monday 19th December.

The Inspector's Report

- 3.8 The Inspector's report and associated Main Modifications can be seen at appendix 1 and 2 to this report. The report covers all stages of the examination including the assessment of the Duty to Cooperate. The report does not cover elements of the plan that were not challenged and not part of the proceedings. The assumption is the plan as submitted was sound and if elements were not

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challenged by objectors or the Inspector, then they are appropriate policies for making sound planning decisions.

- 3.9 Accompanying the report are the Main Modifications, these are the modifications which the Inspector requires to be made to the plan for it to be sound. If these modifications are not accepted in whole, then the plan will not be sound and cannot be adopted. These modifications are very similar to those reported to members in the July 4th report.

A considerable element of the report focuses on two main elements:

- the housing policies in the plan, including objectively assessed housing need and how the plan responds to meeting the needs of the West Midlands conurbation and,
- the site selection methodology for the cross boundary sites on the edge of Redditch.

- 3.10 The Inspector has concluded that the objectively assessed housing need for the District is 6648 dwellings and setting the housing requirement at 7000 is an appropriate target to allow some flexibility, particularly in relation to meeting the needs of the conurbation and affordable housing. The report also concludes that a plan review, including a review of the Green Belt, will be needed to meet, not only the needs of Bromsgrove, but also some of the wider needs of the West Midlands conurbation.

- 3.11 On the subject of the site selection for the housing sites around Redditch, whilst the Inspector expresses frustration about the process undertaken, the narrative work produced in December 2015 and the subsequent hearings in March 2016 have satisfied him that the decision to allocate the sites at Foxlydiate and Brockhill are sound and as such these sites remain as development sites in the plan. The remaining sites around Bromsgrove, Whitford Road and Perryfields received very little focus in the report and as such both remain in the plan unaltered. The Inspector also concludes the policies in the plan, backed up by the Infrastructure Delivery Plan are also sufficient to ensure the correct level of infrastructure can be secured in relation to the development sites coming forward.

- 3.12 Other notable elements of the Inspector's report are:

- The Council can demonstrate a 5 year land supply
- An alteration to allow for the green belt review to be based on sustainable development principles, rather than a more fixed distribution based on the settlement hierarchy as originally proposed, recognising that this may not be appropriate for meeting the needs of the Conurbation.
- Agreement that at this stage it is not necessary to give specific housing numbers or allocations to individual settlements or Parishes.

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- Clarification of the trigger for, and the scope of, the Council's proposed Green Belt Boundary Review to be completed at the latest by 2023.
- Agreement that it would be premature to initiate a Green Belt Boundary Review (GBBR) until there is greater certainty about full scale of housing provision that will be required within Bromsgrove District.

Minor Modifications

- 3.13 At the proposed submission stage of the plan members acknowledged that throughout the process of the EIP officers will be asked by the Inspector about possible changes to the plan to address issues that arise. Delegations were given to allow officers in conjunction with the portfolio holder to suggest changes to the plan, the schedule of these modifications was submitted to the examination at various points as the EIP progressed. Some of these suggested changes are now Main Modifications as detailed in appendix 2. The rest of the changes that the Inspector was happy didn't constitute a change that needed to be made to ensure soundness i.e. minor modifications can be seen at appendix 3. Recommendation 3 above also requests that these are now made to the plan to ensure the final version is up to date, accurate and a usable tool for all those involved in planning in Bromsgrove District.

Sustainability Appraisal

- 3.14 Throughout the whole process of preparing the plan Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken. The final stage of this process is the publication of the SA/SEA adoption statement; this can be viewed at appendix 5 of this report.

Policies Map

- 3.15 Accompanying the proposed submission plan in September 2013 was also a new policies map, and a schedule of changes that were made to the extant Bromsgrove District Local Plan proposals map to create the new policies map. If the BDP is adopted both the policies and the proposals map of the old local plan will be deleted. Paper copies of the policies maps will be available in the first instance, and in due course the online interactive plan will be updated to reflect the new BDP.
- 3.16 Whilst it is necessary to adopt the policies map at this stage, the map itself is not part of the formal development plan and therefore can be updated as the implementation of the plan progresses.

Customer / Equalities and Diversity Implications

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- 3.17 Should the plan be adopted it will be published as per the regulations identified in paragraph 3.3 above. The plan will be available across the District predominantly in the libraries and on the website. Strategic planning officers will be able to offer advice and guidance on the new plan. Training events for key stakeholders such as parish councils can be arranged if requested.

4. RISK MANAGEMENT

- 4.1 The risks associated with adopting the plan are minimal, with a legal challenge being the biggest risk but which is also an unavoidable risk. The benefits of adopting the plan are:
- Provision of a clear planning framework to deliver the vision and development for the future of the area.
 - The ability to develop 4700 houses for Bromsgrove in the short term (total being 7000 up to 2030) (and 3400 for Redditch) helping to meet the housing needs of District and allowing residents better access to the housing market.
 - Assisting in meeting affordable housing deficit
 - Retention of local control over planning matters, the lack of an up to date plan would make the District very vulnerable to ad hoc planning and planning by appeal.
 - Economic benefits would ensue from development not only in the development of new employment sites and a further town centre regeneration but also in the shorter term the in the creation of construction jobs associated with the developments and multiplier effects.
 - Collection of New Homes Bonus
 - Provide certainty for developers and utility providers and other people investing in the area who value the strategic clarity that an up to date plan provides.
 - The clarity of the planning framework set out in an adopted Plan can help authorities to make the case, to government and other funding agencies for infrastructure funding, such as new transport infrastructure
 - An adopted plan would enable the Council to progress with preparing a Community Infrastructure Levy (CIL) thereby enabling needed infrastructure to be provided.

5. APPENDICES

1. The BDP Inspector's Report
2. The BDP Inspector's Main Modifications
3. The BDP Schedule of Minor Modifications
4. The BDP Adoption Statement
5. The BDP SEA/SA Adoption Statement (To follow)

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6. BACKGROUND PAPERS

The Council's website www.bromsgrove.gov.uk/examination contains all the background information concerning the plan and the examination in public.

7. KEY

BDP - Bromsgrove District Plan 2011 - 2013

SA - Sustainability Appraisal

SEA - Strategic Environmental Assessment

GBBR - Green Belt Boundary Review

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Report to Bromsgrove District Council

By Michael J Hetherington BSc(Hons) MA MRTPI MCIEEM

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 16 December 2016

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
BROMSGROVE DISTRICT PLAN**

Document submitted for examination on 12 March 2014

Examination hearings held between 16 June 2014 and 24 March 2016

File Ref: PINS/P1805/429/2

Abbreviations Used in this Report

AA	Appropriate Assessment
AAP	Area Action Plan
ADR	Area of Development Restraint
AHVA	Affordable Housing Viability Assessment
BDC	Bromsgrove District Council
BDLP	Bromsgrove District Local Plan (adopted 2004)
BDP	Bromsgrove District Plan (the plan being examined)
CIL	Community Infrastructure Levy
DEFRA	Department for Environment, Food and Rural Affairs
DtC	Duty to Co-operate
EA	Environment Agency
ELR	Employment Land Review
FRA	Flood Risk Assessment
GBBR	Green Belt Boundary Review
GBSLEP	Greater Birmingham and Solihull Local Enterprise Partnership
GTAA	Gypsy and Traveller Accommodation Assessment
HGDS	Housing Growth Development Study
HGESHAA	Hewell Grange Estate: Setting of Heritage Assets Assessment
HMA	Housing Market Area
HNAR	Housing Needs Assessment Report (August 2014)
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
MM	Main Modification
NWHNR	North Worcestershire Housing Need Report (April 2014)
OAN	Objectively Assessed (Housing) Need
PPG	Planning Practice Guidance
RBC	Redditch Borough Council
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SNPP	Sub-National Population Projections
SOCG	Statement of Common Ground
SPZ	Source Protection Zone
SRN	Strategic Road Network
STW	Severn Trent Water Ltd
SuDS	Sustainable Drainage Systems
WCC	Worcestershire County Council
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Bromsgrove District Plan provides an appropriate basis for the planning of the District, providing a number of modifications are made to the plan. Bromsgrove District Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted. The examination has considered updated information in respect of the objective assessment of the housing needs of both Bromsgrove and Redditch and the justification for the selection of sites to meet these and other growth needs. The report should be read alongside my report into the examination of the Borough of Redditch Local Plan No. 4.

All of the modifications to address this were proposed by the Council but where necessary I have amended detailed wording or added further clarification. I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- clarification of the approach towards providing for the remaining housing needs of Bromsgrove District during the plan period and meeting future housing needs arising from the West Midlands conurbation;
- clarification of the trigger for, and the scope of, the Council's proposed Green Belt Boundary Review;
- inclusion of updated housing supply information;
- inclusion of updated retail capacity information;
- amendments to Green Belt policy in order to accord with national policy;
- clarification of the policy approach towards Gypsies and Travellers in the light of updated evidence submitted during the examination;
- increased emphasis on the role of the Strategic Road Network;
- introduction of additional policy safeguards in respect of flood risk and pollution control;
- clarification of the approach to nature conservation designations in line with national policy;
- amendments in line with national policy changes regarding wind energy, affordable housing contributions and technical standards for housing; and
- introduction of additional requirements for a number of site allocations in respect of matters including heritage assets, water quality, flood risk and transport.

Introduction

1. This report contains my assessment of the Bromsgrove District Plan (BDP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It considers whether the Plan is sound and whether it is compliant with the legal requirements. At paragraph 182, the National Planning Policy Framework (the Framework) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for the examination is the Bromsgrove District Plan (BDP) Proposed Submission Version 2011-2030 which was published for consultation in September 2013.
3. The examination has been carried out alongside the examination of the Borough of Redditch Local Plan No. 4 (BORLP4). Joint hearing sessions have been held, including two days (16 and 17 June 2014) that considered, in respect of both the BDP and BORLP4, the Duty to Co-operate (DtC), objective assessment of housing needs and the approach to meeting additional housing needs from the West Midlands conurbation. These matters were addressed by my Interim Conclusions paper dated 17 July 2014¹, the findings of which in respect of the BDP are summarised in the sections of my report dealing with the DtC and Main Issue 1. The examination of the BDP was paused at that point to enable the Council to respond to my comments in respect of the objective assessment of housing need: this is considered in more detail below.
4. The matter of the approach of both Bromsgrove District Council (BDC) and the Borough of Redditch (RBC) to the selection of sites to meet the growth needs of Redditch has been the subject of considerable debate. Following the main BORLP4 hearing sessions in September 2014, I issued a Post Hearings Note dated 3 October 2014² that, among other matters, highlighted a potentially serious flaw in this methodology. This referred in particular to a site proposed for allocation within Redditch (Webheath) and a cross-boundary site (Brockhill West) that had not been allocated in either Plan. In response, the Councils requested that both Local Plan examinations be paused while further information was prepared. The relevant documentation, to which I refer in more detail below, was published during 2015 and joint hearings were held on 23 and 24 June 2015. Further concerns arising from those sessions were set out in an additional Inspector's Post-Hearings Note dated 10 July 2015³. An additional package of evidence and documentation was issued by both

¹ Document ED/12.

² Document ED/19.

³ Document ED/35.

Councils in December 2015: this was the subject of two further joint hearings held on 23 and 24 March 2016⁴.

5. Given the strong inter-relationship between the BDP and the BORLP4, and the joint nature of much of the evidence that has been submitted by the Councils, the present report should be read in conjunction with my report on the examination of the BORLP4. Many documents are shared between the two examinations (notably those listed as CDX, ED and OED) while others relate specifically to the BDP examination (notably the CDB core documents).
6. My report deals with the main modifications that are needed to make the Plan sound and legally compliant: they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council has requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
7. The main modifications that are necessary for soundness and legal compliance all relate to matters that were discussed at the examination hearings or were considered as written representations. Following the last of the above-noted hearings, the Council prepared a schedule of proposed modifications. Those modifications that are necessary for soundness (the main modifications) have been taken from that schedule, with some amendments as described in this report, and have been subject to public consultation. I have taken account of the consultation responses in coming to my conclusions in this report: as such, the main modifications differ in some respects from those that were the subject of the consultation exercise.
8. The Council is required to maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is then required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the local plan. In this case the, Submission Policies Map⁵ is supported by a document listing the changes from the adopted proposals map to the new policies map arising from the BDP⁶. The main modifications that are now recommended do not require any further changes to be made to this document.

Assessment of Duty to Co-operate

9. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. BDC comments on this in its Duty to Co-operate Statement⁷. This describes the activities that it has undertaken with other bodies in order to maximise the effectiveness of Plan preparation. This

⁴ The timeline of both examinations is summarised in Appendix i to the Narrative on the Site Selection Process for Growth Areas at Redditch (January 2016) – document OED/46a.

⁵ Document CDB1.8.

⁶ Document CDB1.9.

⁷ Document CDB1.4.

includes co-operation with Redditch Borough Council (RBC), which has taken place to a high degree, as is evidenced most notably by the joint working in respect of meeting housing needs from the Borough of Redditch, as well as by the co-ordination in regard of the submission of the two Plans and the holding of joint examination hearings. As is noted below, BDC has participated in the Strategic Housing Land Availability Assessment (SHLAA) for the Borough of Redditch that has been an important input of the assessment of the capacity of the Borough to accommodate new housing.

10. Co-operation has also taken place with other local planning authorities in a wide range of matters that are described in more detail in the above-noted background paper. With RBC, BDC has participated in joint working in respect of the evidence base for assessing housing needs – both in the context of the Worcestershire Strategic Housing Market Assessment (SHMA) (involving all Worcestershire authorities) and the updated evidence base (also involving Wyre Forest DC). Ongoing co-operation with other statutory bodies, notably the Environment Agency, Highways England (formerly the Highways Agency) and the local highway authority (Worcestershire Council Council), has resulted in the preparation of statements of common ground in respect of the BDP and BORLP4 examinations.
11. BDC is a member of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and is involved in the ongoing Joint Strategic Housing Needs Study, which will inform the approach of both BDC and RBC towards meeting future needs arising from the West Midlands conurbation.
12. No objections have been raised in respect of any failure to meet the Duty to Co-operate by any of the bodies prescribed in relevant legislation for the purposes of section 33A(1)(c) of the Act. Taking these matters together, I am satisfied that Duty has been complied with.

Assessment of Soundness

Main Issues

13. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified the following main issues upon which the soundness of the Plan depends.

Main Issue 1: Are the Local Plan's housing policies based on adequate and up-to-date evidence and a clear understanding of housing needs in the market area? Is it clear how the Local Plan has addressed the matter of meeting that part of its housing requirement that is not presently provided for, as well as meeting anticipated future housing needs arising from the West Midlands conurbation? Does an adequate supply of housing land exist in line with national policy?

Objective Assessment of Housing Needs

14. Among other matters, paragraph 47 of the National Planning Policy Framework (the Framework) states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the

Framework's policies. Guidance on undertaking an objective assessment is set out in the PPG. This clarifies that need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand. It should address both the total number of homes needed based on quantitative assessments, but also on an understanding of the qualitative requirements of the market segment. The PPG adds that assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur⁸.

15. The PPG explains that this exercise is an objective assessment of need based on facts and unbiased evidence and that constraints should not be applied to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. Such considerations should be addressed at a later stage when developing specific policies⁹. As such, a clear distinction must be drawn between the objective assessment of housing needs and the eventual determination of a Local Plan housing requirement.
16. The housing needs assessment that underpinned the Plan as submitted is broadly derived from work undertaken in 2012 as set out in the SHMA¹⁰. The SHMA's methodology has been considered in the context of the examination of the South Worcestershire Development Plan (SWDP), for which it also provides part of the evidence base. In his initial Interim Conclusions (October 2013), the Inspector concerned supported in principle the approach of beginning with trend-based projections and then modifying them to take account of the effect of job growth forecasts. However, he identified particular shortcomings in the way that the SHMA had been carried out, finding in particular that there was a lack of clear evidence to support the assumptions made in scenario SS2 and a high degree of sensitivity in the model to changes in those assumptions.
17. The SWDP Inspector's concerns are generally accepted by BDC and RBC. With Wyre Forest District Council, they commissioned the North Worcestershire Housing Need Report (NWHNR)¹¹. At the initial hearing session that considered objectively assessed housing needs (OANs), BDC stated that the overall needs total for Bromsgrove District was considered to be 6,390 dwellings (net) over the above-noted 19 year period. However, this figure has been the subject of further consideration in the light of my Interim Conclusions paper: I return to it below.
18. Before doing so it is necessary to address three general concerns that have been raised about the methodology of both the SHMA and the NWHNR. The first of these relates to the way in which housing completions between 2006

⁸ PPG paragraph ID 2a-003-20140306.

⁹ PPG paragraph ID 2a-004-20140306.

¹⁰ Documents CDB7.2a-b.

¹¹ Document CDB13.3.

and 2011 have been considered. Both studies present household growth data over the period 2006-2030, while both Plans cover the period 2011-2030. In deriving final housing needs figures for the Local Plan periods from the output of the relevant scenarios, both reports deduct the houses that were completed between 2006 and 2011. Given that building rates were comparatively low during those 5 years, this has resulted in somewhat higher annual averages for the period 2011-2030.

19. It is argued by representors seeking to reduce housing requirements that the period 2006-2011 should effectively be discounted on the basis that there was oversupply prior to 2006 in respect of the 2001-2011 Structure Plan period. The Councils have provided additional clarification in respect of this matter¹². The base date from the 2012 SHMA was aligned to the plan period of the West Midlands Regional Strategy Phase 2 revision. Given the policy context applying at the time, this was understandable. In order to be consistent, it was necessary for the NWHNR to adopt the same base date as the SHMA. In any event, it is clear that the SHMA sought to assess housing need over the period beginning from that base date. It is therefore both appropriate and consistent with national planning policy to ensure that under-supply during the period following the SHMA's base date is properly provided for.
20. The second general concern relates to the definition of the housing market area (HMA). It is argued by some representors that objectively assessed needs should be considered on the basis of an HMA that includes the West Midlands conurbation rather than the Worcestershire HMA. However, the Council accepts that Bromsgrove lies within a wider market area that includes the West Midlands and that the Worcestershire HMA is not perfectly defined. I agree that such definition is not an exact science and, moreover, that it is clear from both the SHMA and the NWHNR that relationships beyond the county boundary have been considered. A specific sensitivity scenario (SS4) was applied to address the potential for an increased level of in-migration from the conurbation taking into account expected high levels of economic growth and population increase. Furthermore, the principle of providing for additional housing to meet the conurbation's needs has also been accepted. Given the practical difficulties of extending the SHMA to cover the substantial number of local planning authority areas which relate to Bromsgrove in terms of migration and travel to work data, I therefore agree with the Council that its approach to HMA definition is both pragmatic and robust.
21. A third concern relates to the headship rates that have been adopted in the NWHNR. This adopts an 'option C' combination, which applies CLG 2011-based headship rates up to 2021, reverting to the 2008-based rate of change thereafter. This method was endorsed by the SWDP Inspector in his October 2013 Interim Conclusions paper. While it is argued that circumstances have since changed and that (in summary) this assumption is too conservative, it seems to me that the stance that he adopted, and that has been followed in the NWHNR, remains justified. Specifically, it is important to note that the 2011-based projections were interim and applied to only a 10 year period.

¹² Document M01/1a.

22. As already noted, I considered the Council's OAN figure in my Interim Conclusions paper (July 2014)¹³. The arguments are set out in detail in that paper. In summary, I did not accept the Council's view that the OAN figure of 6,390 dwellings, which derived from the output of a scenario based upon population projections (SNPP-2010), represented an adequate assessment of OANs as required by national policy. Indeed, that scenario was itself presented in the NWHNR for 'benchmark' purposes: the NWHNR went on to examine various sensitivity scenario projections, stating that scenarios SS3 and SS4 'are considered to provide the most realistic reflection of likely labour market and demographic realities'¹⁴. While I considered that an alternative scenario (SS4) represented a more robust demographic-led assessment of likely housing needs for the District than the SNPP-2010 scenario, I raised concern that sole reliance on either of the demographic-led scenarios (SNPP-2010 or SS4) would give an inadequate picture of the implications of projected changes in the labour market.
23. In this context, the Framework requires that the assessment of housing should take full account of relevant market and economic signals. As the PPG makes clear¹⁵, employment trends should be taken into account. Specifically, plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. The PPG adds that where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, the PPG states that plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.
24. In the case of Bromsgrove, all three employment growth forecasts contained in the NWHNR suggest a substantial growth in jobs numbers, ranging from some 10% to 13% for the period 2012-2030. As already noted, the NWHNR set out a sensitivity scenario (SS3) that used this labour market research to derive assumptions about the degree to which overall labour market conditions will impact upon future activity and employment rates and, therefore, the local supply of labour. The average case output for scenario SS3 suggested a net need of 9,760 dwellings within Bromsgrove over the above-noted period. This 'jobs-led' scenario suggested a much higher level of housing need in the District than either of the demographic-led scenarios. However, as described in my Interim Conclusions paper, it did not take into account the potential for jobs growth to affect local commuting patterns.
25. As noted above, the PPG raises a concern that where labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. In

¹³ Document ED/12.

¹⁴ Paragraph 4.7 of the NWNHR – document CDB13.3.

¹⁵ PPG paragraph 2a-017-20140306.

the present case, Bromsgrove District is already characterised by significant net out-commuting. Given that the District is therefore, in effect, a net exporter of labour, it could be argued in principle that a local growth in jobs within the District might act to 'rebalance' existing commuting patterns rather than exacerbate unsustainable patterns as referred to in the PPG.

26. In that context, I noted that the housing forecasts set out in the NWHNR held the commuting ratio constant over the forecast period 2012-2030. Given that this ratio fell in Bromsgrove between 2001 and 2011 when job numbers in the District increased – in contrast to Redditch where both the ratio and the number of jobs remained broadly constant – the rationale for this assumption was unclear.
27. In response to the above concerns the Council commissioned the BDP Housing Needs Assessment Report (August 2014) (HNAR)¹⁶, which also took into account the most recent 2012-based Sub-National Population Projections (SNPP). The 'benchmark' 2012-based SNPP suggests a significantly lower population growth than the previous 2010-based projection.
28. The HNAR examined the matter of the commuting ratio in the light of my comments above. A variety of reduced commuting ratios were introduced into the jobs-led Core Scenarios and Sensitivity Scenarios, creating 18 different annual dwelling requirements¹⁷. Once employment forecasts were averaged, and completions and a vacancy rate taken into account, the resulting dwelling requirement ranged from 3,710 to 9,200. The highest of these relates to the base SS3: however, as this takes no account of a fall in the commuting ratio I share the Council's view that it represents an unrealistic assessment. Similarly, the lowest figure in this range relates to sensitivity scenario SS3d: this results in a highly unlikely balance between in- and out-commuting.
29. Accordingly, the Council has taken an average of the three remaining updated scenarios (SS3a, b and c) to establish its base figure of 5,540 dwellings over the Plan period. This is broadly comparable to the equivalent 'benchmark' output of 5,280 dwellings from the SNPP-2012¹⁸.
30. As already noted, it is necessary to take full account of relevant market and economic signals. In the present case it is clear that specific market signals, notably affordability, have worsened over time – for example, in households in the lower earning quartile¹⁹. Accordingly, the Council has decided that the above-noted figure should be increased by 20% (55 dwellings annually), a figure that it considers is based on reasonable assumptions and consistent with the principle of sustainable development. This leads to the Council's

¹⁶ BDP Housing Needs Assessment: Report in response to Inspector's Interim Conclusions – document ED14.

¹⁷ Table 3 of document ED/14.

¹⁸ See table 4 of document ED/14.

¹⁹ Appendix B to document ED/14.

conclusion²⁰ that its assessment of the level of objectively assessed housing needs has been amended to a figure of 6,648 dwellings.

31. I am satisfied that this assessment is appropriately justified. As set out above, it is necessary to take a realistic view of trends in commuting patterns in order to ensure that appropriate account is taken of economic factors when assessing housing needs in line with the PPG's advice. As already noted, the employment growth forecasts relate to jobs growth within the District: it is important to ensure that there is not a mismatch between forecast jobs growth and future labour supply. The PPG seeks to avoid unsustainable commuting patterns. Specific guidance on how demographic-based assessments should be amended in the light of market signals is not set out in national planning policy. However, the Council has clearly undertaken an assessment of local based factors and I have no substantive reason to disagree with the 20% uplift that it has applied.
32. The Council proposes changes to reflect this updated evidence base [**MM2; MM13**]: these are needed in order to be effective, justified and consistent with national policy.

Housing Requirement

33. Notwithstanding the above, the Council wishes to retain the figure of 7,000 dwellings as the Local Plan housing requirement. In the Council's view, the additional 350 dwellings (approximately) will provide greater flexibility in housing provision consistent with the Framework's aim of boosting significantly the supply of housing, as well as including an additional element for affordability. I have no reason to take a different view. Bearing in mind the presence of significant constraints to development in both the BDP and BORLP4 areas (as discussed elsewhere in both reports) I consider that the adoption of this figure represents, in principle, positive planning in line with paragraph 157 of the Framework. However, the Plan as submitted does not seek to allocate land to deliver this full amount of housing: provision is only made for some 4,700 dwellings, with the remainder to come forward through a Green Belt Boundary Review (GBBR). The Council also acknowledges that additional provision will be required to meet the needs of the West Midlands conurbation. I now turn to address these matters.

Approach to Meeting Future Housing Needs

34. It is common ground that the West Midlands conurbation, and specifically the City of Birmingham, is expected to experience unprecedented levels of economic growth and population change over the period of the BDP and BORLP4. As already mentioned, BDC, along with other GBSLEP members (and additional local planning authorities), is participating in a Joint Strategic Housing Needs Study which will inform the approach towards meeting future needs arising from the West Midlands conurbation. At the time of writing, the final phase of this exercise is yet to be completed and agreed. The present

²⁰ Letter from BDC to the Inspector dated 25.9.14 – document ED/15a.

position is therefore that the distribution of the likely shortfall within the wider sub-region has yet to be determined.

35. Notwithstanding this uncertainty, the BDP recognises that there may be a need to assist the City of Birmingham in achieving its housing target. Policy BDP4.2 commits BDC to undertake a Local Plan review including a full review of the Green Belt in advance of 2023. In addition to identifying land to help deliver the objectively assessed housing needs of the West Midlands conurbation within the current plan period (to 2030), the policy also requires the identification of land to meet the shortfall between the Council's stated housing supply and the above-noted 7,000 dwelling target.
36. This approach has attracted a significant level of objection from the development sector. Some representors consider that it renders the plan unsound to an extent that the examination should progress no further until the GBBR is carried out. Others seek amendments to ensure that such a review is undertaken immediately following adoption. However, while the scale of the shortfall arising from the City of Birmingham Development Plan is now somewhat clearer, the distribution of additional housing within the wider sub-region – including Bromsgrove District – has yet to be agreed by the local planning authorities concerned.
37. As such, it seems to me that it would be premature to initiate a GBBR until there is greater certainty about the full scale of housing provision that will be required within Bromsgrove District. Delaying the present examination would be unlikely to assist the delivery of those development sites that *are* proposed for allocation in the BDP, including those that are required to meet the needs of the Borough of Redditch. It therefore appears prudent that the GBBR should not be undertaken until relevant and robust evidence is available – notably the completion of the GBSLEP Joint Strategic Housing Needs Study. However, it is also essential – in line with national policy – that an adequate supply of housing land is maintained during the intervening period.
38. Clearly, the GBBR will also include a 'known' element, namely the outstanding shortfall in respect of Bromsgrove District's own housing needs. Subject to the Council's ability to demonstrate an adequate supply of housing land during the intervening period (with particular reference to paragraph 49 of the Framework) – a matter that I consider below – I see no reason in principle why it is necessary to allocate land to meet all of the Plan's requirements at the outset. As already noted, the Plan period runs to 2030: to allocate specific sites for all of this period at the present time would be in excess of the Framework's requirements.
39. In addition, there are advantages in incorporating such an exercise into a single GBBR that can also consider housing needs arising from the conurbation as well as identifying land to be safeguarded for the longer term – i.e. 2030-40. Multiple reviews of the Green Belt would be avoided, thereby addressing the Framework's requirement (paragraph 83) that Green Belt boundaries should be considered having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.
40. Nevertheless, I agree with some representors that there is scope for greater clarity to be given about both the timing and scope of the GBBR. Policy BDP4

should give greater certainty about the triggers for the GBBR – specifically in respect of, first, the outcome of the GBSLEP Strategic Housing Needs Study and, second, the need to ensure that a five year housing land supply is maintained during the intervening period. It is also necessary to clarify that the GBBR will be progressed through a review of the Local Plan. This is accepted by the Council, which proposes modifications accordingly. However, additional clarity about the triggers for the GBBR is needed within policy BDP3.1 and I have added text from the suggested amendment to paragraph 8.28 accordingly. In the main modifications consultation exercise, concern was raised by some parties about the suggested removal of the 'prior to 2023' deadline from policy BDP3.1. The evidence before me, including the Council's comments at the relevant hearing session, suggests that the triggers referred to above are likely to be in place well before that date. However, I appreciate that the presence of a deadline provides some certainty to the process and I agree that it is necessary for soundness reasons that it is made clear that the review will be completed by 2023 at the latest. Nevertheless, given that the exercise may well take place before that date, I agree with the Council that this date should only be included as an ultimate deadline. The relevant changes **[MM4; MM18; MM20-22; MM24; MM29-30]** are recommended for reasons of effectiveness

41. In respect of the scope of the GBBR, the BDP implies a contradiction. Policy BDP4.3 requires the review to follow the approach in the policy BDP2's settlement hierarchy. As noted below, the evidence underpinning the District's settlement hierarchy²¹ does not include an assessment of those parts of the West Midlands urban area outside the District that immediately adjoin the District boundary. The main urban area does not appear within the hierarchy itself. However, paragraph 8.31 of the BDP states that land along the northern boundary of the District that adjoins the West Midlands conurbation will be considered within the GBBR.
42. The Council's response to this concern (in its final schedule of modifications) is to suggest that paragraph 8.31 should be changed to say that consideration of the above land would be subject to the evidence showing that this is the best location for growth. However, I do not feel that this modification is needed for soundness reasons: I have seen no evidence that this land should not be at least considered as part of the future GBBR along with other areas of the Green Belt. Nevertheless, I agree with the Council that the paragraph should refer explicitly to the GBSLEP Strategic Housing Growth Study. I also agree that policies BDP4.3 should be amended to delete the reference to the BDP settlement hierarchy and state instead that the GBBR will follow sustainable development principles. Additional text is also needed to policy BDP2 along those lines. However, in order to be consistent with the proposed change to policy BDP4.3, it is necessary to delete references to the GBBR being in accordance with the settlement hierarchy from paragraph 8.29 and policy BDP2. These changes **[MM4; MM9; MM25-26; MM28; MM31]** are needed for reasons of effectiveness and consistency with national policy.

²¹ Notably document CDB6.1.

Housing Land Supply

43. As already noted, the BDP does not identify sufficient land to meet its 7,000 dwelling housing requirement. The July 2013 Strategic Housing Land Availability Assessment (SHLAA)²² identifies sites for some 4,624 dwellings. This has been subject to review during the examination period and the overall supply figure has increased to some 4,729 dwellings – equivalent to between 12 and 13 years supply based upon the annual average requirement of 368 dwellings. The components of this supply have been set out in more detail in the Council's evidence²³. A substantial part of this supply is contained in the Bromsgrove Expansion Sites allocated in policy BDP5A. Justification for the windfall allowance of 40 dwellings per annum, which has been increased from the figure of 30, is set out in the more up-to-date assessment of five year housing land supply, discussed below. This increase is based upon evidence of increased recent windfall rates that take account of dwellings delivered through permitted development rights – notably relating to agricultural buildings. Bearing in mind the rural nature of much of the District, a modest increase of 10 dwellings per annum in the windfall estimate appears realistic – and is well below the current rate of delivery.
44. Taking these matters together, I am satisfied that the Council's revised assessment is robustly based. The Council proposes changes to update the Plan in this regard [**MM14-19**]: these are needed in order to be effective and justified. Clearly, as already discussed, there remains a substantial shortfall between the identified supply and the overall housing requirement that will need to be addressed by the proposed GBBR and Local Plan Review.
45. In respect of the five year land supply position, an updated position statement was issued in April 2014²⁴. However, in view of the delay that had occurred to the examination, I asked the Council to produce a further update. This was published for consultation in December 2015²⁵. A number of concerns were raised by respondents in respect of that document and a further update (dated 4 March 2016) was attached to the Councils' joint statement for the March hearings²⁶. This presents the land supply position at 1 March 2016 and represents the most up-to-date picture of land supply for the District.
46. It is first necessary to consider whether there has been a record of persistent under-delivery of housing in the terms of paragraph 47 of the Framework. Although annual completions declined in recent years, falling below an annual average calculated from the Worcestershire County Structure Plan (1996-2011) target after 2006/7, high levels of delivery early on in that period (notably between 2000/1 and 2004/5) meant that the Structure Plan target was comfortably exceeded by 2011²⁷. While a shortfall remains in the current

²² Document CDB7.5

²³ Hearing statement by BDC (document B2/1) pages 7-9; updated supply information in document S/1 (joint BDC/RBC statement).

²⁴ Document CDB13.5.

²⁵ Document OED/46d.

²⁶ Appendix 2 to document S/1.

²⁷ Data in Appendix 2 to document S/1.

plan period (from 2011) there is a clear trend of increasing completion rates. Bearing in mind that a moratorium on new housing permissions was in place in Bromsgrove between 2003 and 2009 as a result of *oversupply*, it does not seem to me that a record of persistent under-delivery can be demonstrated. The PPG advises that the assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle²⁸. As such, application of a 5% buffer, in line with paragraph 47 of the Framework, is justified. A change to policy BDP3 **[MM23]** is required for reasons of effectiveness as a result.

47. Using the Sedgefield approach, applying a 5% buffer and applying the buffer to the outstanding shortfall, the Council states that there is a five year land supply of 2,933 dwellings against a requirement of 2,655 dwellings. This gives a 'headroom' of some 278 dwellings, resulting in a 5.52 years supply. As already noted I am satisfied that the windfall estimate is robust. While objections were raised to the inclusion of C2 uses in the housing supply data in the December 2015 topic paper, these have been excluded from the more recent calculations referred to above.
48. Particular concerns have been raised in respect of the Council's assumptions in respect of four specific sites – Perryfields Road, Whitford Road, the Finstall Training Centre and the Council House, Burcot Lane – and the lack of a 'lapse rate' (or discount) in respect of undeveloped sites. In respect of the first of these sites (Perryfields Road) an outline planning application has been submitted. Phasing information has been provided by the developer²⁹, which has informed the Council's estimated delivery trajectory. This suggests a delivery of 822 units in five years, assuming a site start (40 units) in 2017/18. Bearing in mind the Council's commitment to the timely determination of planning applications, following previous scrutiny of its performance, I am satisfied on balance that this start date appears realistic.
49. Evidence³⁰ submitted by the same developer in respect of the Foxlydiate site (discussed below) suggests that a build rate of at least 120 market dwellings per year would also be achievable at Perryfields Road. The inclusion of other elements, such as affordable housing and housing for the elderly would be likely to enable additional dwellings to be delivered. Build rates in excess of this figure have been achieved at a number of sites in the locality³¹: the highest of these being some 195 dwellings per year at Oakalls, Bromsgrove. To my mind, such local evidence – supported by the recent trend of increasing completion rates already noted – is to be preferred to the more generic national figures advanced by some of the representors. Nevertheless, I have seen little evidence that would justify assuming annual delivery rates in excess of 200 units from the Perryfields Road site. This would reduce the anticipated yield from this site from 822 dwellings to 623 dwellings – equivalent to a

²⁸ PPG ID 3-035-20140306

²⁹ Appended to Appendix 2 of document S/1.

³⁰ Document ED/47a, Appendix 4.

³¹ Document ED/47, para 3.13.

reduction of 199 units³².

50. The estimated annual build rates for the Whitford Road do not exceed 120 units and to my mind appear realistic. While the site has been the subject of a planning appeal dismissal and subsequent High Court challenge³³, it is clear from comments made at the examination hearing by Worcestershire County Council (WCC) that the developer is working closely with the local highway authority to resolve outstanding issues. A further planning application has been submitted. Given that a reduced level of delivery is anticipated in the first year (2017/18) I am satisfied on balance that the Council's assumptions are realistic.
51. The two remaining sites relate to previously-developed land. It was confirmed at the hearing that both are now vacant. The Council does not expect delivery from either site to commence until 2018/19. This estimate appears suitably cautious.
52. The Council has reviewed its historic data to consider whether the application of a 'lapse rate' should be applied. Information relating to the last 5 years shows that there has been a generally low rate of lapsed permissions³⁴. The average figure was 2.8%. While there was a lapse rate of almost 20% in one year (2010/11) this related to a time when total outstanding commitments were low and recessionary factors were applicable. As already noted, the rate of annual housing completions is rising. I have seen no specific evidence that the developments included in the Council's five year land supply are unlikely to come forward. I therefore agree with the Council that there is no need to apply a broad brush 'lapse rate' discount.
53. Drawing the above together, I consider that as a result of the reduction that should be applied to the assumptions relating to the Perryfields Road site, the Council's overall five year housing land supply total should be reduced by some 199 units (to a figure of 2,734 dwellings). Given the 'headroom' noted above, this means that I am satisfied that the Council is at present able to demonstrate a five year land supply. However, the margin for error (some 79 dwellings) is not substantial. This places particular importance on the need for the Council to progress the GBBR and Local Plan review in a timely manner, as discussed above.

Conclusion – Main Issue 1

54. Subject to the changes recommended above, I therefore conclude that the Local Plan's housing policies are based on adequate and up-to-date evidence and a clear understanding of housing needs in the market area, that it is clear how the Local Plan has addressed the matter of meeting that part of its housing requirement that is not presently provided for as well as meeting anticipated future housing needs arising from the West Midlands conurbation

³² This calculation assumes yields of 200 units in 2018/19 and 2019/20 and a yield of 183 units in 2020/21 (to recognise that this is an 11 month period).

³³ Document S/3a.

³⁴ Pages 34-36 of Appendix 2 to document S/1.

and that an adequate supply of housing land exists in line with national policy.

Main Issue 2: Is the Local Plan's settlement hierarchy and proposed distribution of development sufficiently clear and adequately justified? Is the decision to accommodate some of the growth needs of Redditch within Bromsgrove District appropriately justified? Is the methodology for selecting sites, including land required to meet the growth needs of Redditch, robust and transparent?

Settlement Hierarchy

55. Policy BDP2 explains that there are four main facets to the delivery of housing within the District. In summary, these are: development of previously-developed sites within settlement boundaries; expansion sites around Bromsgrove Town; development sites in or adjacent to large settlements; and affordable housing exception sites within rural areas. The Council proposes to clarify that these are not set out in priority order **[MM8; MM9(part)]**; this is needed for reasons of effectiveness. The policy makes reference to the settlement hierarchy set out in table 2 of the Plan. It is unclear from the Plan's layout as to whether the table forms part of the policy itself. The Council confirms that it is intended that the table should fall within the policy and proposes a modification accordingly **[MM9(part)]**.
56. The Council also accepts that additional clarity is needed in order to clarify which areas are considered to be parts of the settlements of Barnt Green and Wythall for the purposes of the policy **[MM10]**. In this context, I note the concern of some representors that Lickey is in a different parish from Barnt Green and has different facilities. I have no reason to disagree. However, bearing in mind the particular scope of policy BDP2 there is no soundness reason to justify two distinct settlement boundaries: in physical terms the two built-up areas, which are surrounded by the Green Belt, are contiguous.
57. The Council also proposes to delete the column headed 'suitable development' from table 2 **[MM11; MM55]**; given that the Council accepted at the relevant hearing session that the uses listed in this column are not intended to amount to a prescriptive list, this change provides necessary clarity. The acceptability of any particular use in any particular settlement will clearly depend upon the policies of the Plan as a whole along with site-specific considerations. All of the above changes to policy BDP and table 2, including deletion of a reference to villages highlighted in blue that is no longer needed **[MM12]**, are recommended for reasons of effectiveness.
58. The main evidence base supporting the settlement hierarchy is the Settlement Hierarchy Background Paper³⁵. Within its scope, this is a generally robust document that justifies the hierarchy set out in table 2. I do not therefore agree with those representors who seek to have the status of particular settlements amended. However, while the Background Paper considers settlements within the District, it excludes (as already discussed) from detailed

³⁵ Document CDB6.1.

evaluation those parts of the West Midlands conurbation that are outside, but adjoin, the District boundary. Given that, with the exception of land around Redditch (to which I return below) it is not proposed at present to review the Green Belt boundary, this approach appears justified in the context of the Plan as submitted. While an allocation is proposed at Frankley (policy BDP5B), this relates to a previous Area of Development Restraint (ADR). Housing and employment sites that were allocated at Longbridge through the Longbridge Area Action Plan (AAP) (adopted in 2009 by BDC and the City of Birmingham Council)³⁶, related to the specific circumstances arising from the closure of the MG Rover car plant.

59. However, given the absence of detailed consideration of the West Midlands conurbation, the BDP settlement hierarchy forms an incomplete basis for the forthcoming GBBR. The comparative merits, in sustainable development terms, of – for example – extensions to the conurbation compared to further development in and around settlements within the District are not made explicit. As already noted, I agree with the Council that such an exercise should be based upon sustainable development principles, and I recommend changes accordingly (as set out above). For consistency, I also recommend that references to the BDP settlement hierarchy forming the 'approach' or the 'guiding principles' of the GBBR should therefore be deleted. Clearly, however, this is a matter to be addressed in the forthcoming Local Plan review. For the avoidance of doubt, this report takes no view on the relative merits of any particular strategy that may be considered at that stage.
60. It has been suggested that the Plan should include specific housing targets for each settlement. However, I share the Council's view that – at the present stage – such an exercise would be arbitrary and unrealistic. The development potential of individual settlements will necessarily involve assessing a number of detailed site-specific factors. Given the extent of the Green Belt within the District, the GBBR will be an important factor in that assessment.

Meeting the Growth Needs of Redditch within Bromsgrove District

61. Particular concern has been voiced about the principle of accommodating some of the growth needs of Redditch within Bromsgrove District. Paragraph 18 of the Framework requires that in order to be 'sound' a plan should, among other matters, be positively prepared. It explains that this means that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, *including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development* (my italics). Bearing in mind the inability of the Borough of Redditch to meet its full development needs within its own boundaries (as described in my report on the BORLP4), the principle of Bromsgrove District accommodating some of the growth needs of the neighbouring authority is clearly in line with national planning policy.
62. As I explain in the BORLP4 report, I am satisfied that the broad approach of

³⁶ Document CDB2.7.

seeking land to meet the growth needs of Redditch in the form of urban extensions to the existing built-up area is justified. Given that the built-up area is so tightly constrained by the administrative boundary of the Borough of Redditch, the decision to assess potential sites in neighbouring local authority areas – as well as within the Borough – is also justified.

63. As set out in that report, a robust assessment of suitable sites within Redditch has been carried out, for example through successive SHLAA exercises. It is notable that BDC has verified the Redditch SHLAA and that it does not dispute the SHLAA methodology or findings. A significant number of sites have been allocated for development within Redditch although, as set out in my BORLP4 examination report, these are not sufficient to meet the BORLP4's overall housing requirement.
64. For these reasons, it seems to me that the approach that has been taken by BDC and RBC fully accords with the spirit and intentions of the Duty to Co-operate, as described at the start of this report. Paragraph 179 of the Framework states that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. It adds that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. The broad approach of the BDP and BORLP4 towards meeting the growth needs of Redditch accords with national policy in this regard. I consider the details of this exercise below.

Site Selection Methodology – Meeting the Needs of Bromsgrove District

65. It is first however necessary to consider the sites that have been identified to meet the needs of Bromsgrove District. The allocations proposed in the BDP in this regard generally relate to land that has previously been considered as having, at least in principle, longer term development potential. Many of the greenfield sites are presently identified as Areas of Development Restraint (ADRs) and do not lie within the Green Belt. As already noted, a full Green Belt Boundary Review (GBBR) is yet to be undertaken.
66. The broad approach to the distribution of development to meet the needs of Bromsgrove District comprises three main strands. First, three sustainable urban extensions are proposed to the west and north of Bromsgrove itself – the Bromsgrove Town Expansion Sites (policy BDP5A). Second, a number of additional development sites are identified in other settlements around the District: these focus primarily upon second tier 'large settlements' identified in the above-noted hierarchy, including Alvechurch, Barnt Green, Catshill, Hagley and Wythall (policy BDP5B). Allowance is made for affordable housing on rural exception sites by policy BDP9. Finally, town centre regeneration sites are identified in policy BDP17.
67. The resulting approach appears justified in line with the submitted evidence base. In particular, it takes account of a number of studies of development and strategic site options, notably the Analysis of Proposed Strategic Sites, Development Options for Bromsgrove District (both December 2010), and the

Area Assessment Study (September 2013)³⁷. As noted below, the identification of town centre regeneration sites follows earlier work on an Area Action Plan (AAP) that has been taken forward into the present Plan.

68. A significant number of additional Green Belt sites have been promoted for development by representors. It has also been suggested that the existing village envelopes should be removed. However, given that I have concluded that the Council's strategy of seeking to meet a proportion of its future housing needs (along with needs arising from the West Midlands conurbation) through a future GBBR and Local Plan review is justified, it follows that there is no soundness reason to consider such proposals at the present time. Indeed, in the absence of a GBBR, it seems to me that there is at present insufficient evidence to undertake a robust comparative assessment of the sites or boundaries concerned. For the avoidance of doubt, and with the exception of those sites that have been considered in the context of meeting the needs of Redditch, my report makes no comment on the merits of 'omission sites'.

Site Selection Methodology – Meeting the Needs of the Borough of Redditch

69. The exercise to identify land to meet the growth needs of Redditch (BDP policy RCBD1.1), and – in respect of the BDP – the identification of the site at Foxlydiate in particular, has been the subject of a significant level of objection. These matters have been discussed at a number of joint examination hearings. I comment on the site selection methodology in some detail in my report into the BORLP4 examination, which should be read in parallel with the present report. In the present report, I focus specifically upon the implications of the site selection exercise for the BDP – notably the decision to identify the major site at Foxlydiate in preference to an alternative location for a development of a broadly similar scale at Bordesley. It should however be noted at the outset that the proposed allocation of Green Belt land for housing at Brockhill (policy RBCD1.1 Site 2), which adjoins the BORLP4 strategic site of Brockhill East (BORLP4 policy 46) has proved to be uncontroversial.
70. As explained in my BORLP4 report, the up-to-date position in respect of the process and the supporting evidence base is set out in the Narrative on the Site Selection Process for the Growth Areas at Redditch (the Narrative) prepared by both BDC and RBC in January 2016³⁸. Section 16 of the Narrative sets out the Councils' conclusions on the choice of those sites that have been selected for allocation and those that have been rejected.
71. The process that has been undertaken to reach that position is summarised in sections 8 and 9 of the Narrative. This refers to, and expands upon, a number of key documents, notably the Housing Growth Development Study (HGDS)³⁹

³⁷ Documents CDB6.2a, 6.2b, 6.3a and 6.3b.

³⁸ Document OED/46a

³⁹ Document CDX1.1. While this took account of earlier studies, notably the Joint Study into the Future Growth Implications for Redditch Town to 2026 prepared by White Young Green in December 2007 (document CDX1.5), it represented an entirely independent assessment.

(January 2013) and the Addendum to the HGDS (the HGDS Addendum)⁴⁰ (November 2014). Both of these documents were accompanied by Sustainability Appraisals (SA). In addition, the SA that accompanied the BORLP4 (dated September 2013)⁴¹ was subject to a 'refresh' in November 2014 and a further revision in May 2015⁴² in the light of the additional work that had been undertaken by the Councils during the examination period. While the BDP SA was also 'refreshed' at that time⁴³, BDC clarified at the relevant hearing (June 2015) that this does not in itself contain a detailed assessment of growth options for Redditch within the BDP area, referring instead to the BORLP4 SA. In principle, this seems to me a suitably pragmatic approach: I see no benefit in duplicating such an exercise and the BDP SA (as updated) provides appropriate cross-references to the relevant documentation.

72. The starting point for the HGDS search exercise was the identification of some 20 broad areas around the urban area of Redditch⁴⁴. However, as set out in my report into the BORLP4 examination, the HGDS excluded areas (included in ADRs) that were proposed for allocation for housing and employment uses in both plans. As explained in my BORLP4 report, this represented a potentially serious flaw in the methodology and, as a result, I requested that further work should be undertaken. In response, both Councils issued the HGDS Addendum. As set out in my Post Hearings Note dated 10 July 2015, this document – although lacking in some clarity – provides sufficient justification in respect of the conclusions of the appraisal of the initial broad areas⁴⁵.
73. The HGDS Addendum takes forward seven areas for consideration in more detail (the focussed area appraisal) – namely areas 3, 4, 5, 6, 8, 11R and 18. Areas 4, 5, 6, 8 and 11R all lie wholly (or mainly) within Bromsgrove District: areas 3 and 18 are discussed in more detail in my report into the BORLP4 examination. In my Post-Hearings Note dated 10 July 2015, I expressed a concern that the conclusions of the focussed area appraisal in the HGDS Addendum lacked a sufficient explanation of why the options that were eventually selected for development had been selected. However, as noted above, additional detail has been provided by the Narrative document – notably at section 16.
74. As discussed in my BORLP4 report, the difference between Redditch's housing requirement and the capacity to accommodate new housing within the Borough amounts to some 3,400 dwellings during the periods of the BDP and BORLP4. I agree with the view of the Councils (expressed at the hearing session in March 2016) that, bearing in mind the various factors discussed elsewhere in my reports on both Plans, achievement of this figure effectively requires one of two potential large sites identified within the focussed area appraisal to be allocated as part of the preferred strategy. These are the sites

⁴⁰ Document CDX1.47

⁴¹ Document CDR1.11 in the BORLP4 examination.

⁴² Document OED/33a

⁴³ Document OED/34

⁴⁴ These are set out in Map 1 (page 16) of the HGDS (document CDX1.1).

⁴⁵ This is summarised in paragraphs A4.84 to A4.87 of the HGDS Addendum – document CDX1.47.

within areas 4 (Foxlydiate) and 8 (Bordesley). The HGDS calculates their capacities to be some 2870 and 2451 dwellings respectively. While both of these figures have been subject to further refinement, I am satisfied that they are broadly indicative of the likely yield bearing in mind the need to take account of other constraints – not least the need to establish a new defensible Green Belt boundary. Clearly, however, neither site would be sufficient on its own: additional land is required to reach the 3,400 dwelling target. (I address the merits of an alternative approach involving neither of these sites below.)

75. The choice of which of these two large sites to allocate has not been straightforward. While the eventual Foxlydiate allocation (policy RCBD1.1 Site 1) has been subject to a considerable level of objection, I have seen no evidence that a decision to allocate land at Bordesley instead would have been any less controversial. Indeed, towards the end of the examinations, some representations were submitted from communities in the locality of Bordesley indicating their objection to any change along such lines.
76. To my mind, choices of this nature are a necessary part of the local planning process. Subject to meeting the soundness criteria set out in the Framework, such decisions are best made at the local level by local planning authorities. Nevertheless, the role of a local plan examination is to consider whether such choices are appropriately justified.
77. In the present case, the merits of Foxlydiate and Bordesley are considered in the HGDS, with a clear conclusion being drawn in the Narrative document⁴⁶. This helpfully clarifies which factors weighed more heavily in the area selection process and which were not individually important in determining the final outcome. In summary, I share the view of both Councils that the following main distinctions between these two alternatives can be identified:
 - While both sites would involve encroachment into the Green Belt, the analysis within the HGDS demonstrates that stronger and more defensible Green Belt boundaries can be achieved at Foxlydiate than at Bordesley.
 - Although located further from the town centre than Bordesley, Foxlydiate is better related to the existing urban area because it adjoins an area of existing built development at Webheath, while Bordesley is separated from the main urban area by Arrow Valley Park. Notwithstanding the ability to create routes through this area of green infrastructure or to access the town centre along the A441, I share the view of the Councils that development at Bordesley would not represent a natural extension of the town. I agree that it would be physically more isolated from the main urban area than development at Foxlydiate.
 - While development at Foxlydiate would reduce the open gap between Redditch and Bromsgrove, a significant amount of separation would

⁴⁶ Document OED46/a, section 16.

remain. There is less separation between Redditch and Alvechurch. As such, development at Bordesley would erode the separation of settlements to a somewhat greater extent than development at Foxlydiate.

- On the assessment of the HGDS, Foxlydiate offers the potential to accommodate more housing than Bordesley, thereby reducing (although not avoiding) the need for sites to be found elsewhere.
- Development at Bordesley offers the potential to assist in the provision of the Bordesley bypass, which – if constructed – would amount to a significant transport improvement on the A441 corridor⁴⁷.

78. In respect of the potential for a Bordesley bypass, the Councils note that there is no evidence about either the likely costs of such a project or how it would be funded and delivered in practice⁴⁸. Representations on behalf of the site's promoter indicate that the relevant land is in their control and that development at Bordesley could assist in delivering the bypass. A route is indicated on indicative masterplans for the site's development⁴⁹. However, it is unclear whether such development would fund the full costs of any bypass or whether additional public funding would be required. A previous planning permission for a Bordesley bypass has now lapsed. These factors reduce the weight that I can attach to this matter as a factor supporting the selection of the Bordesley site.

79. The HGDS notes that part of the Foxlydiate site, notably the land north of the bridleway between Curr Lane⁵⁰ and the A448 has a greater than 60% likelihood of being best and most versatile agricultural land. Post-1988 agricultural land classification information in respect of part of the Foxlydiate site is available on the MAGIC website (DEFRA) but this information is not presented in respect of other land around Redditch. Representors have raised concern that given that it is known that grade 1 agricultural land is present at Foxlydiate, the site cannot be allocated until other areas around Redditch have been surveyed to a comparable standard. However, it is clear from the HGDS that the potential for other sites around Redditch to include the best and most versatile agricultural land has also been recognised. Recognised data sources have been used (see later in this report). I have no reason to doubt the view of the Councils that this is not a factor that materially distinguishes between the above-noted alternatives. As such, their approach accords with paragraph 112 of the Framework.

80. Taking these factors together, and notwithstanding the potential transport advantages of providing a Bordesley bypass if this could indeed be secured, it seems to me that the Councils are justified in selecting Foxlydiate in preference to Bordesley.

⁴⁷ Document CDX1.12.

⁴⁸ Document S/1, pages 7-8.

⁴⁹ For example documents CDX1.8-1.9.

⁵⁰ Also referred to as Cur Lane in the documentation. The local signage uses 'Curr Lane'.

81. Other parties have suggested that a combination of smaller sites would be a preferable alternative to either of the above proposals. I do not agree. The reduced area 11 (11R) carried forward into the focussed area appraisal has similar drawbacks in term of separation from the main urban area and reduction of the gap between Redditch and Alvechurch to those identified in respect of Bordesley. It does not represent a preferable alternative. If area 11R is discounted, the remaining two sites (those identified at areas 5 and 6 – Brockhill West and East respectively) would – even if both were allocated – provide markedly less than the 3,400 dwelling target. The HGDS estimates the potential capacities of these at 1,560 and 672 dwellings respectively, leaving a shortfall of 1168 dwellings.
82. The choice of Foxlydiate means that land for some 600 additional dwellings is required to achieve the 3,400 dwelling target. In principle, either area 5 or 6 would be of sufficient scale to meet this requirement. For the reasons set out below, it seems to me that area 6 (Brockhill East⁵¹) has significant advantages over area 5 (Brockhill West).
83. As already noted, the BDP Brockhill East allocation (within area 6) – despite the loss of Green Belt land involved – has proved to be uncontroversial. It relates well to the existing urban fabric of the town and has relatively easy access to the town centre. A strong Green Belt boundary can be established. There are limited environmental constraints and there is no evidence that heritage assets would be adversely affected. The site adjoins an ADR within Redditch Borough (also allocated for development) thereby enabling a co-ordinated cross-boundary scheme to be achieved.
84. Land at Brockhill West (within area 5) is promoted by representors as an alternative site. The majority of this land lies within Bromsgrove District, although its southern section lies within Redditch Borough. I share the view of the promoters that this site has some advantages: it is well related to the existing built-up area with good accessibility to the majority of facilities. However, I agree with the Councils that it is less well placed than Brockhill East in that regard. The promoters of Brockhill West consider that, on an equitable assessment, the site performs better than both Foxlydiate (area 4) and the Webheath allocation proposed in BORLP4 (policy 48). However, for the reasons already discussed, Brockhill West cannot be considered as a reasonable alternative to a larger site – either alone or in combination with other smaller sites. I comment on the comparative merits of Brockhill West and Webheath in my report on the BORLP4 examination. In summary, the fact that Webheath does not lie within the Green Belt, is already (in part) the subject of planning permission for development and is not subject to the same heritage constraints as Brockhill West (see below) are strong factors supporting its allocation in preference to Brockhill West.

⁵¹ The site proposed for allocation in this area in the BORLP4 is called Brockhill East (BORLP4 policy 46) while that in the BDP (policy RCBD1.1, site 2) is called Brockhill. However, in this section of my report I have described the BDP Brockhill allocation as 'Brockhill East' in order to distinguish it from the omission site promoted by representors at Brockhill West.

85. The Councils' main concern with regard to Brockhill West relates to the effects of the proposal on the heritage assets of the Hewell Grange Estate - namely a Conservation Area, Registered Park and Garden (RPG) and various listed buildings and structures. These were the subject of a 2013 study by BDC that was prepared in the light of concerns from English Heritage (now Historic England) - the Hewell Grange Estate: Setting of Heritage Assets Assessment (HGESHAA)⁵². However, as set out in my Post-Hearings Note to the Councils dated 10 July 2015, there are particular concerns with this document. Notably, it reached a conclusion that 'substantial harm' (in the terms of the Framework) would be caused to the assets' significance. The Council accepted at the relevant hearing session that this should be changed to 'less than substantial'. While I have no reason to disagree with that assessment, it appears that the assessment of the site's merits in the HGDS had been made on the basis of an incorrect understanding of the level of harm that would be caused.
86. In addition, I raised concern that in view of the provisions of the Framework, and notwithstanding the statutory duty imposed by Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, a finding of 'substantial harm' (or, indeed, 'less than substantial harm') is not in itself a reason to necessarily rule out development. As is made clear by the Framework, such harm should be balanced against public benefits. It was not, at that stage, obvious where (or indeed whether) that balance had been undertaken. A further concern, to which I return below, was the absence of a full consideration of area 4 (Foxlydiate) - which also lies close to heritage assets at Hewell Grange - from this exercise.
87. The Council responded by publishing an updated version of the HGESHAA, along with an assessment of the balance between harm and public benefits⁵³. The robustness of these updated documents has been criticised by the promoters of Brockhill West, who have submitted alternative heritage evidence. I share some of the representors' concerns in respect of the updated HGESHAA. In particular, I disagree with its conclusion that '*any* development of area 5 would therefore result in the *loss* of this part of the setting of the [heritage assets] ...'⁵⁴ (my italics). To my mind, this overstates the likely effect of development within a smaller section of the site (for example that part which lies within Redditch) that would be well-separated from the assets themselves.
88. Nevertheless, I agree with the Council that the agricultural surroundings of the heritage assets - notably the Registered Park and Garden (RPG) and Conservation Area⁵⁵ - provide a rural setting that contributes to the assets' significance. Development of the larger area suggested in the most recent representation⁵⁶ would extend close to the boundary of the Conservation Area

⁵² Document CDX1.38. The listed buildings and structures are set out in an appendix to that document.

⁵³ Documents OED/46b and OED/46g.

⁵⁴ Page 55 of document OED/46b.

⁵⁵ The heritage assets also include listed buildings - see document OED/46b.

⁵⁶ Document XB1/4a & 4b: Appendix 1 Concept Masterplans.

and RPG. As set out in the updated HGESHAA there is a significant amount of intervisibility – both from viewpoints within area 5 towards the woodland of the RPG and Conservation Area and from the edge of woodland over area 5 towards the urban area. As a result, the rural setting of the heritage assets would be markedly diminished by residential development in the larger area that is now suggested for development. While development in a smaller area, as described above, would enable a clear separation from the heritage assets to be maintained, the degree of intervisibility between much of area 5 and the heritage assets themselves means that even that level of development would result in some harm to the assets' setting.

89. Although such harm would be 'less than substantial' in terms of the Framework, it is still necessary that a balancing exercise should be undertaken. Given that the required housing can be provided at Brockhill East without such harm resulting, and bearing in mind the particular advantages of the Brockhill East site as summarised above, it seems to me that it cannot be shown that the public benefits arising from an allocation at Brockhill West would outweigh the harm to the heritage assets. I comment separately on the effect of the Webheath allocation in respect of heritage assets in my report into the BORLP4 examination.
90. Drawing all of the above together, I am satisfied that the selection of the sites proposed for allocation at Foxlydiate and Brockhill East in the BDP (policy RCBD1.1) is appropriately justified. I comment on the Foxlydiate site in more detail later in this report.
91. Although not within BDP policy RCBD1.1, the proposed employment allocation at Ravensbank (the Ravensbank Expansion Site in BDP policy BDP5B) is also intended to meet the needs of Redditch. This site, which occupies an existing ADR, is well related to existing employment areas. Concern had been raised by English Heritage (now Historic England) that the effects of this proposal on the setting of Gorcott Hall (a grade II* listed building with associated listed structures) had not been assessed. This has now been carried out⁵⁷. Subject to additional references being added **[MM45-46]**, which are necessary in order to be justified and consistent with national policy, Historic England has no outstanding objections in respect of this matter⁵⁸. I have no reason to take a different view.

Sustainability Appraisal

92. Concern has been raised by a number of representors about the adequacy of the Sustainability Appraisal (SA) that underpins the development strategy set out in both the BORLP4 and BDP in respect of meeting Redditch's growth needs – particularly in relation to housing needs. In response to my request at the March 2016 hearings, a legal opinion⁵⁹ has been submitted by both Councils to the effect that the information submitted in both examinations is consistent with, and not in conflict with, the relevant legal requirements –

⁵⁷ Appendix B to BDC's matter B4 hearing statement – document B4/1.

⁵⁸ Statement of Common Ground between BDC and Historic England – document OED/37.

⁵⁹ Document ED/50.

notably the requirements of section 19(5) of the 2004 Act and regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004.

93. In summary, I have no reason to disagree with this conclusion. While deficiencies have been highlighted in the documentation that was originally submitted⁶⁰, these have been largely remedied by later documents – notably the HGDS Addendum, the Narrative, the final BORLP4 SA (May 2015) and the minor amendments to that SA accompanying the Councils' joint statement of case dated 4 March 2016⁶¹. Taken together, and notwithstanding my comments below about the testing of alternative scenarios, I am satisfied that these demonstrate that reasonable alternatives have been considered and explain why the Councils have rejected some alternatives and proceeded with others. The inclusion of specific conclusions in section 16 of the Narrative, has markedly increased the robustness of this exercise. While the Narrative has not been accompanied by substantive new SA work, such additional work appears unnecessary given that significant changes to the approach that has already been subject to SA are not being proposed as a result of that document. I share the view of the Council's legal advisor that SA should be a proportionate exercise and that an unduly forensic level of analysis of specific scores and alternatives is not appropriate.
94. As already noted, the BDP SA, which was also 'refreshed' in June 2015, does not in itself contain a detailed assessment of growth options for Redditch within the BDP area, referring instead to the BORLP4 SA. As is also set out above, I am satisfied in principle that this is a suitably pragmatic approach: I see no benefit in duplicating such an exercise and the BDP SA (as updated) provides appropriate cross-references to the relevant documentation.
95. Concern has been expressed with regard to the consideration of alternatives through the SA process. Arising from my concerns about the omission of the ADRs from the HGDS document (discussed in more detail in my BORLP4 report), four scenarios, described as 'additional scenarios' were set out in the Narrative document⁶².
96. In respect of the BDP, concerns have been raised about the relative treatment of Bordesley (area 8) in these scenarios, notably in respect to the treatment of Foxlydiate (area 4). Of the four 'additional scenarios' listed, only one (scenario 2) includes Bordesley. However, the scenario is rejected as it does not provide sufficient capacity to meet the required level of need. As such, it does not – and could never – amount to a reasonable alternative to the selected option (scenario 1), as it (in effect) represents a different strategy entirely – that of not meeting the identified housing requirement. I make a similar argument with respect to Webheath in my BORLP4 report.
97. The Councils contend that the assessment of Bordesley's site capacity in this updated exercise (a figure of 1,000 dwellings) was based upon their view of

⁶⁰ See for example my Post Hearings Note dated 10 July 2015 – document ED/35.

⁶¹ Document S/1. These take account of the updated work on heritage assets described in the main body of this report.

⁶² Document OED/46a, pages 75-78.

the comments of the site's promoters about the likely housing yield. However, this was disputed by the promoters themselves: in fact their representation refers to a *minimum* of 1,000 dwellings⁶³ and they suggest a figure of some 2,000 dwellings, although this figure appears to assume some development in area 11. As already noted, the Councils themselves assumed a larger figure (of 2,541 dwellings) in the HGDS. As such, their capacity assessment for area 8 in the Narrative's 'additional scenario' exercise does not appear to be robustly justified.

98. Having said that, even if the HGDS capacity figure (of 2,541 dwellings) was applied to Bordesley, scenario 2 would still fail to deliver the required total. The usefulness of this exercise is therefore unclear. As stated in my BORLP4 report, I feel that the Councils' presentation of the testing of alternatives in the Narrative has been unhelpful. A more robust, and common sense, way of setting out the alternative scenarios would have been to consider groups of reasonable alternatives of a sufficient scale to meet the required housing figure – and then consider the relative merits of each option. Alternatively, if reasonable alternative scenarios were not felt to exist then there would be little merit in undertaking such comparative scenario testing.
99. A similar argument can be applied, in part, to the testing of alternatives in the HGDS: the only alternative scenario to include Bordesley in section 8 of that document also failed to deliver the required housing total. However, the relevant text also refers to the concerns about the ability of the Bordesley site to integrate with Redditch's existing urban form – as discussed above.
100. Nevertheless, I do not feel that these matters amount to a fatal flaw – either in soundness or SA terms. As already noted, the comparative assessment and conclusion contained in section 16 of the Narrative document sets out the relative merits of Bordesley against the other sites that were carried forward into the Broad Area Appraisal. The reasons for the decision to allocate Foxlydiate in preference to Bordesley, which are consistent with the approach set out in the HGDS in this respect, are clearly explained. Given that preference, and bearing in mind the underlying evidence base already referred to, I have no reason to suppose that the testing of additional scenarios containing different combinations of sites would have resulted in a different outcome. I therefore reject the assertion that an inadequate consideration of alternatives has occurred.

Conclusion – Main Issue 2

101. For these reasons, and subject to the changes recommended above, I conclude that the Local Plan's settlement hierarchy and proposed distribution of development is sufficiently clear and adequately justified, that the decision to accommodate some of the growth needs of Redditch within the Borough is appropriately justified and that the methodology for selecting sites, including land required to meet the growth needs of Redditch, is robust and transparent.

⁶³ Document XB1/14.

Main Issue 3: Are the Local Plan's proposals for the provision of employment, community services and retailing, and for the regeneration of Bromsgrove Town Centre, sufficiently justified and consistent with the evidence base and national policy?

Employment

102. The key evidence base underpinning the Plan's employment policies is the Bromsgrove District Employment Land Review (ELR)⁶⁴, published in December 2012. Although pre-dating the release of the PPG I am satisfied that the ELR broadly conforms to up-to-date guidance. The ELR concludes that the District's minimum requirements are approximately 20 ha of employment land. However, the BDP identifies some 28 ha in order to ensure that a balanced portfolio of sites and location is available, as well to strike an appropriate balance between housing and employment growth. As already discussed, all three employment growth forecasts contained in the NWHNR suggest a substantial growth in jobs numbers for Bromsgrove District, ranging from some 10% to 13% for the period 2012-2030. To my mind, this approach represents positive planning in line with the Framework's requirements: it is noted that representors from the business sector have generally supported the allocation of further land to accommodate employment growth.

103. Among other matters, paragraph 22 of the Framework states that 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. It adds that land allocations should be regularly reviewed. In the present case, the ELR has reviewed the quality and appropriateness of existing employment sites, while a number of employment sites have been reviewed through the SHLAA⁶⁵. Very limited releases are proposed. However, the Council states that flexibility has previously been applied in specific circumstances – for example the granting of planning permission for a mixed use development including 157 dwellings on employment land at Stoke Prior on the basis of the evidence that was submitted at the time. In that context, I am satisfied that policy BDP14 of the Local Plan provides sufficient flexibility in line with the approach of the Framework.

Community Services

104. Policy BDP12 seeks both to provide for services and facilities to meet the needs of the community and to retain those services and facilities for which a need is identified. The Council proposes a change to recognise that the needs of service providers should be taken into account when making such assessments **[MM63]** and I agree that this is needed for reasons of effectiveness.

Retail & Town Centre Issues

105. The BDP incorporates work on the Bromsgrove Town Centre Area Action Plan

⁶⁴ Document CDB8.1a.

⁶⁵ See Appendix 1 to document B3/1.

(AAP) and puts forward a strategy that seeks to recognise the role of the town centre as a catalyst for regeneration and the delivery of housing and economic growth. Policy BDP17 defines the Town Centre, with extended primary and secondary shopping zones, and in addition identifies 10 development opportunity sites for a variety of uses. Policy BDP18 sets out policies for Local Centres elsewhere in the District. This positive approach is supported by a considerable body of evidence including town centre health checks and retail studies⁶⁶ and is consistent with national policy (notably paragraph 23 of the Framework). In particular, the extent of the Town Centre Zone has been guided through work on the Town Centre AAP and has taken account of relevant Framework definitions.

106. The need for the regeneration of Bromsgrove's town centre is apparent from the above-noted evidence base. The most recent retail study⁶⁷ indicates that there is likely to be a slight oversupply of convenience retailing in the town centre over the Plan period, and a limited shortfall of some 16,300 square metres gross comparison retail floorspace. The Council proposes changes to take account of this more recent information [**MM67; MM73**] which are needed in order to be justified and effective. I have amended the Council's suggested wording to clarify that this figure relates to gross floorspace.

107. Changes are also proposed by the Council to provide clearer support for a wide range of uses at first floor level, such as office, retail and residential [**MM74(part), MM80**] and to give an enhanced focus on achieving a safe, balanced and socially responsible evening economy [**MM74(part); MM82; MM83; MM101**]. These are recommended for reasons of effectiveness. Additional changes to specific policy requirements for the town centre development opportunity sites, for example in respect of flood risk, are addressed later in this report.

Conclusion – Main Issue 3

108. For these reasons, and subject to the changes recommended above, I conclude that the Local Plan's proposals for the provision of employment, community services and retailing, and for the regeneration of Bromsgrove Town Centre, are sufficiently justified and consistent with the evidence base and national policy.

Main Issue 4: Does the Local Plan provide satisfactorily for specific housing needs including affordable housing, housing for the elderly, low cost market housing and the needs of Gypsies and Travellers, consistent with national policy?

Affordable Housing

109. The affordable housing needs of Bromsgrove District were assessed in the SHMA (February 2012) and the Worcestershire SHMA Monitoring Document

⁶⁶ Notably documents CDB9.1 to CBD9.6.

⁶⁷ Document CDB9.4.

(June 2013)⁶⁸. These indicate an annual need for affordable housing in Bromsgrove District of 219 and 205 dwellings per year respectively.

110. Policy BDP8 proposes a two-tier approach to the requirement for affordable housing. A 40% requirement is applied to greenfield sites and any other sites accommodating 200 or more dwellings, while brownfield sites of less than 200 dwellings are required to make 30% provision. The Council proposes to change the threshold for affordable housing to accord with the WMS of 28 November 2014 **[MM54(part)]** and this is recommended for consistency with national policy.
111. The identified level of need for affordable housing represents a significant proportion (some 55-60%) of the Plan's overall annual housing requirement (of 368 dwellings/year). The targets set out in policy BDP8 are therefore unlikely to fully deliver the identified need. As noted above the Plan's housing requirement is somewhat higher than the overall level of objectively assessed housing need. However, the constraints that apply to housing delivery within the District, as already discussed, limit the potential to for further increases in order to achieve a higher yield of affordable housing. In addition, the requirements set out in policy BDP8 have been derived in the light of studies of the effects on development viability – the Levvel Ltd report (March 2012) and the Local Plan Viability Study for both the BDP and BORLP4 (March 2014)⁶⁹. The Council comments that although the latter document was published after submission, its preparation (beginning in 2013) informed the development of relevant policies.
112. The Levvel Ltd report supports the two-tier approach that is proposed by the Council – both in terms of the greenfield-brownfield split and the use of a 200 dwelling threshold for the application of the differential policy. While a wide variety of value areas was identified within the District, it seems to me that the suggested approach is broadly justified by this evidence base. In specific cases where the required target cannot be achieved, policy BDP8 provides sufficient flexibility to enable a lower provision to be negotiated. However, the evidence before me suggests that the Council has to date had some success in applying a two-tier policy approach (albeit in draft form) in recent years, with 40% provision secured in a number of cases⁷⁰. To my mind, this approach appears appropriately justified. The Council suggests that the policy is altered to allow for a higher level of affordable housing to be provided if this is proposed **[MM54(part)]**: given that this is not intended to apply an additional requirement on developers, this change would allow greater flexibility and could contribute towards meeting the above-noted need. It is recommended for reasons of effectiveness.
113. A consequence of this policy stance is that the Redditch cross boundary sites proposed in BDP policy RCB1.1 would be subject to a different affordable housing requirement to that of nearby sites within the Borough of Redditch. It

⁶⁸ Documents CDB7.2a & b and CDB7.4 respectively.

⁶⁹ Documents CDB7.9a-c and CDB6.4c respectively.

⁷⁰ Appendix A to document B5/1.

is acknowledged that this creates an apparent anomaly: however, as set out in my report into the BORLP4 examination, the evidence base supporting that plan does not support the adoption of a 40% target within Redditch itself. Equally, the evidence within the BDP examination does not justify a reduction from the 40% greenfield figure. However, should viability concerns emerge within these sites then policy BDP8 contains flexibility as already described.

Housing for the Elderly

114. Policy BDP10 provides explicit encouragement for the provision of housing for the elderly and for people with special needs. This is supported by evidence of need in the SHMA and the Worcestershire Extra Care Housing Strategy⁷¹. A specific allocation for retirement-led residential units and C2 nursing care uses is made at Recreation Road (policy BDP17, site TC2), while policy BDP5A requires that the site at Perryfields Road (policy BDP5A, site BROM2) should include an extra care-type facility of approximately 200 units. It therefore seems to me that adequate provision is made within the Plan. However, as is set out below, references to the Lifetimes Homes standard should be deleted from policy BDP10 and other parts of the Plan in line with the Written Ministerial Statement of 25 March 2015. In addition, I agree with the Council that changes should be made to policy BDP10 to allow for a wider range of accommodation for the elderly **[MM59]** and to the Plan's vision to emphasise the importance of meeting such needs **[MM3]**. These are needed in order to be effective.

115. Bearing this in mind, I do not accept the view that additional provision should be made to enable specialist accommodation to be developed on Green Belt sites. As already noted, a full GBBR has yet to be undertaken: the introduction of a policy allowing an exception to be made for such developments would conflict with national Green Belt policy. While concern has been raised in respect of the lack of specific provision for housing for the 'active elderly', it seems to me that this would be difficult in practice to distinguish from general market housing: in any event, substantive evidence of a specific outstanding need in that regard has not been demonstrated.

Low Cost Market Housing

116. Concern has been made that the Plan makes insufficient provision for park home developments. It is accepted that these can form a type of low cost market housing. However, while national planning policies, notably the Framework and Planning Policy for Traveller Sites (PPTS) set requirements for affordable housing and traveller sites respectively, there is no policy requirement that Local Plans should make special arrangements to provide for a particular type of low cost market housing. As such, demand for this type of accommodation should be seen in the context of the wider need for housing within the District as a whole. It is not therefore necessary to make specific allocations for such developments in order for the Plan to be sound.

⁷¹ Documents CDB7.2a & b and CDB7.12 respectively.

Housing Mix and Density

117. Policy BDP7 requires development proposals to take account of identified housing needs in terms of the size and type of dwellings. While a focus on 2 and 3 bedroomed properties is identified, I am satisfied on balance that the policy contains sufficient flexibility and is not unduly prescriptive. Clearly, it is necessary that appropriate account is taken of local character and distinctiveness. The Council proposes a change to clarify that a wider mix of dwelling types may be required on schemes of 10 or more dwellings **[MM53]** and I agree that this is needed for reasons of effectiveness.

Gypsies and Travellers

118. The Planning Policy for Traveller Sites (August 2015) (PPTS) places requirements on Local Plans in respect of this matter. A robust evidence base should be prepared, including early and effective community engagement with both settled and traveller communities (PPTS policy A). Pitch targets should be set and a supply of sites identified (PPTS policy B).
119. At the start of the examination, I raised a concern that the Local Plan did not appear to accord with these requirements⁷². However, during the examination the Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA) was issued⁷³ and was the subject of a consultation exercise. No substantive criticisms were raised in respect of either the methodology of the study or its conclusions. I have no reason to take a different view.
120. In respect of Bromsgrove, the GTAA concludes that there is sufficient capacity to cover identified requirements to 2018/19 and that there is no overall additional need for plots for travelling showpeople during the remainder of the Plan period. I agree with the Council that it is necessary to change the Plan in order to reflect the updated evidence base. However, the GTAA indicates a need for permanent pitches after 2019/20. The Council's revised wording does not fully reflect this and, having due regard to the Public Sector Equality Duty, additional changes are therefore needed in order to ensure that adequate provision is made available. I agree with the Council that, in the light of the matters already discussed, policy BDP11 should also be changed to make explicit that additional land requirements will be met through the proposed Local Plan review. I have amended the relevant text to refer to the need that has been identified through the GTAA. These changes **[MM60-2]** are needed in order to be effective, justified and consistent with national policy.

Conclusion – Main Issue 4

121. For these reasons, and subject to the changes recommended, I conclude that the Local Plan provides satisfactorily for specific housing needs including affordable housing, housing for the elderly, low cost market housing and the needs of Gypsies and Travellers, consistent with national policy.

⁷² Inspector's Letter dated 10 April 2014 – document ED/3.

⁷³ Documents CDB13.7 and 13.8.

Main Issue 5: Does the Local Plan provide satisfactorily for the delivery of development, with particular reference to transportation infrastructure?

122. Although infrastructure requirements associated with specific Local Plan allocations are set out in the Plan itself, the overall infrastructure requirements arising from the BDP are contained in the BDP Infrastructure Delivery Plan (IDP) (February 2014)⁷⁴. This provides a baseline of existing infrastructure capacity and needs within the District and sets out the infrastructure that is needed to support the predicted growth contained within the Plan. It is a 'live' document and it is intended that it will be reviewed in the future – specifically in order to take into account the additional growth needs to be accommodated through the Local Plan review. The IDP has been the subject of cross-boundary consultation – notably with RBC, with whom a joint schedule has been prepared in respect of transport and cross-boundary developments. The Council proposes to amend the Plan to clarify the IDP's status **[MM1; MM99]**: these changes are needed for reasons of effectiveness.
123. As already noted, the viability of development has been tested through the Local Plan Viability Study (July 2014)⁷⁵. This adopts the residual valuation method and has tested strategic sites in Bromsgrove alongside a set of other modelled sites for residential and non-residential development. It concludes that, on balance, the cumulative impact of the Council's policies does not put residential development at risk. Indeed, the majority of sites tested within Bromsgrove District performed well, although viability concerns were identified with respect to brownfield and urban infill sites. As discussed above, policy BDP8 allows for flexibility to be applied in respect of affordable housing contributions where viability concerns are demonstrated. In respect of other infrastructure contributions, the Council remains committed to the introduction of the Community Infrastructure Levy (CIL). However, it proposes to add new text to policy BDP6 to clarify that prior to the introduction of CIL it will seek contributions on a case by case basis in line with relevant policy and guidance. This change **[MM52(part)]** is recommended for reasons of effectiveness.
124. The Local Plan indicates that monitoring will take place through the preparation of the Council's monitoring reports, alongside other regular exercises such as the monitoring of housing and employment land availability. Indicators are set out in Appendix 5 of the Plan. The Council proposes a number of changes to the list of indicators – including both additions and deletions. While these are not needed in order to make the Plan sound, it appears prudent to ensure that indicators are both relevant and able to be monitored with ease.
125. The Local Plan is supported by a range of transportation evidence⁷⁶. During the Plan's preparation, concern was raised by the Highways Agency – now Highways England – about the effects of the levels of growth envisaged in Bromsgrove on the strategic road network (SRN). Outstanding questions

⁷⁴ Document CDB1.13. This supersedes the September 2013 version (document CDB6.5).

⁷⁵ Document CDB13.6.

⁷⁶ Notably documents CDB8.8 to 8.15.

remained around whether and how the level of planned growth beyond 2021 arising from the housing requirement in Bromsgrove could be accommodated on the SRN. The agency added that work was ongoing in respect of further modelling as well as investigating the potential for specific improvements.

126. A statement of common ground (SOCG) (November 2014) was subsequently agreed between Highways England, BDC, RBC and WCC⁷⁷. This states that the parties agree that the BDP reflects a proportionate level of transport evidence to demonstrate that subject to ongoing assessment work, its provisions are deliverable over the Plan period and that the Plan is sound. I have seen no substantive evidence to justify taking a different view. Changes are proposed to the BDP to give greater clarity in respect of the need for transport assessment and the approach to developer contributions: these **[MM6; MM9 (part); MM51(part); MM52(part); MM65-66]** are needed for reasons of effectiveness. Changes are also proposed to the IDP in respect of the SRN, although these cannot be subject to recommendations in my report.

Conclusion – Main Issue 5

127. For these reasons, and subject to the changes listed above, I conclude that the Local Plan provides satisfactorily for the delivery of development, with particular reference to transportation infrastructure.

Main Issue 6: Does the Local Plan take adequate account of the effects of development on the natural and built environment? Is its approach to development within the Green Belt consistent with national policy?

Flood Risk & Water Quality

128. The Plan is supported by a range of relevant technical evidence, notably the joint RBC/BDC Strategic Flood Risk Assessment (SFRA) and the joint RBC/BDC Outline Water Cycle Study⁷⁸. Nevertheless, the Environment Agency (EA) has raised concerns about a number of matters: the omission of several of the Town Centre sites from the level 2 SFRA; phasing arrangements for these sites in respect of waste water infrastructure; and about ground water protection – notably at Foxlydiate (RCBD1.1, site 1). The latter point was also raised by Severn Trent Water Ltd (STW).

129. In response to these concerns, a SOCG was agreed between BDC, RBC, the EA and STW in July 2014⁷⁹. A further SOCG was agreed between the EA and the two councils in March 2016⁸⁰. In respect of the Bromsgrove Town Centre sites, the parties agree that revised wording to relevant policies should be changed to provide greater safeguards in respect of flood risk assessment. However they agree that existing safeguards within policies BDP5A and BDP23 are sufficient to ensure that waste water infrastructure would be in place in time for the proposed developments. In respect of Foxlydiate, additional

⁷⁷ Appendix 2 to document B3/1.

⁷⁸ Documents CDB10.12 and CDB10.11 respectively.

⁷⁹ Appendix A to document B4/1.

⁸⁰ Document ED/45

wording is proposed to policy RCBD1.1 in respect of stronger safeguards on flood risk assessment, the use of Sustainable Drainage Systems (SuDS) to manage surface water run-off, and additional requirements in respect of water quality to avoid pollution risks to controlled waters (including the need to take into account any previous contaminative uses). This is discussed in more detail later in this report. I agree that all of these changes [**MM7; MM37; MM42-44; MM47; MM51 (part); MM68-72; MM76; MM78-79; MM84; MM96**] are necessary for reasons of effectiveness and consistency with national policy.

130. In consultation with the EA, the Council has proposed changes to impose the new optional water efficiency standard (of 110 litres per person per day) on residential development within the Foxlydiate site (policy RCBD1.1) and Bow Brook and Batchley Brook catchments (policy BDP23) [**MM51, MM97**]. I am satisfied that the need for such a standard is justified by the submitted evidence base. The viability of applying a more stringent standard (the 105 litres per person per day standard in the former Code for Sustainable Homes) than that now proposed has been tested⁸¹. The imposition of requirements in respect of water use within non-domestic buildings [**MM51 (part)**] is also justified by the submitted evidence base.

Agricultural Land Quality

131. As already mentioned, agricultural land quality has been considered during the site selection and allocation processes using various data sources in the order of preference advised by Natural England. This is: the pre- and post- 1988 Agricultural Land Classification Maps, the Agricultural Land Classification Strategic Map (Natural England) and the provisional Agricultural Land Classification made available by DEFRA⁸². For Bromsgrove Town sites agricultural land quality is set out in the various assessments of development options⁸³, while for Redditch growth options it is considered in the HGDS.

Nature Conservation and Biodiversity

132. Policy BDP21 seeks to achieve better management of the District's natural environment and sets out a number of requirements for new development. However, it does not distinguish appropriately between the different levels of protection that national policy applies to different types of designation. The Council recognises these concerns and proposes amended wording accordingly. Subject to a further amendment to refer more explicitly to the requirements of paragraph 118 of the Framework, these changes [**MM88**] are needed for reasons of effectiveness and consistency with national policy. The identification of development sites has been supported by ecological appraisals⁸⁴ and the plan as whole is supported by a Green Infrastructure

⁸¹ Document CDB13.6.

⁸² See document B4/1, page 2 and document CDB10.26 pages 54-55.

⁸³ Documents CDB6.2b and CDB6.3a.

⁸⁴ Documents CDB10.25a-b, CDX1.13, CDX1.24 and CDX1.42.

Baseline Report⁸⁵.

Housing Standards

133. Local Plan policy BDP19 sets out a number of specific requirements aimed at achieving high quality design. However, these include requirements to adhere to technical standards that have now been superseded following the WMS of 25 March 2015. The Council proposes changes in order to reflect the new national technical standards for housing. Subject to some additional clarification, as well as the removal of proposed references to other standards (such as Building for Life 12) and the suggested 'expectation' that sustainable building techniques and local and low carbon materials will be used (which appears to introduce an additional design standard), I recommend these changes [**MM36; MM41; MM54(part); MM56-58; MM81; MM83; MM89-92; MM94(part); MM95; MM97**] as being necessary in order to be consistent with national policy.

Renewable Energy

134. A further WMS dated 18 June 2015 set out new considerations to be applied to wind energy development. This matter has not been the subject of significant comment or representation in this examination. Nevertheless, it is necessary to amend policies BDP15 and BDP22 (and some supporting text) to clarify that they do not apply to wind energy developments, which will be considered against national policy and guidance. These changes [**MM64; MM93-94(part)**] are necessary for consistency with national policy.

Heritage Assets

135. Policy BDP20 sets out a comprehensive approach towards managing the historic environment. The Council proposes changes [**MM85-87**] to clarify the terminology of this policy in respect of heritage assets. These are needed in order to be consistent with national policy. The Council has explained in general terms how it has considered heritage assets in respect of specific sites⁸⁶. Site-specific heritage matters are considered in more detail elsewhere in this report. For example, as noted above, changes are recommended in respect of the relationship between the Ravensbank Expansion Site and Gorcott Hall, a grade II* listed building [**MM45-46**] and in respect of the relationship between the Foxlydiate development site (policy RCBD1.1, site 1) and heritage assets at Hewell Grange Estate [**MM51(part)**].

Green Belt policy

136. The Council proposes changes to policy BDP4 to ensure that its approach to development within the Green Belt is consistent with national policy in the Framework. These include the deletion of 'and other uses of land' from policy BDP4.4(b) in line with paragraph 89 of the Framework [**MM32**], clarifications of the policy approach to dwelling extensions and the replacement of buildings

⁸⁵ Document CDB10.26.

⁸⁶ Document B4/1, pages 5-6.

[MM27; MM33-34], a correction to the reference to paragraph 14 (footnote) of the Framework **[MM5]** and an update to the reference in the Plan's glossary **[MM98]**. In respect of the thresholds set out in policy BDP4.4(c), the Council refers to earlier supplementary planning guidance⁸⁷ and gives a number of examples of how this has been applied in practice in planning appeals since 2002⁸⁸. In the circumstances, and notwithstanding the scale of extensions that can be available through permitted development rights, I am satisfied that these thresholds provide useful local guidance and are appropriately justified.

Conclusion – Main Issue 6

137. For these reasons, and subject to the changes listed above, I conclude that the Local Plan takes adequate account of the effects of development on the natural and built environment and that its approach to development within the Green Belt is consistent with national policy.

Main Issue 7: Are the allocated sites appropriate and deliverable? Are the detailed requirements for the allocations clear and justified? Are the boundaries and extent of the sites correctly defined?

138. The assessments that have taken place to identify development sites to meet the needs of Bromsgrove District, along with those needs of the Borough of Redditch that cannot be met within the Borough itself, have been described above. The appropriateness and deliverability of the sites has been considered through SHLAA exercises (in respect of housing sites) and ELR (in respect of employment sites). Viability has been assessed, as also discussed above. Required infrastructure is set out in the IDP and, in respect of many sites, in the Local Plan itself. None of these exercises has identified substantive barriers to the developments now proposed.

Meeting the Needs of Bromsgrove District

139. As already described, the sites proposed for allocation to meet the needs of Bromsgrove District fall into three broad categories: the Bromsgrove Town Expansion Sites (policy BDP5A); additional sites in other settlements (policy BDP5B); and Bromsgrove Town Centre Regeneration sites (policy BDP17). In general terms, none of these sites have been the subject of a significant level of objection during the examination. However, as described above, concerns have been raised in respect of flood risk, drainage and water quality in respect of several sites (notably in Bromsgrove Town Centre) and a number of modifications have been proposed in these regards as already discussed. In addition, the Council proposes to add references to the Green Infrastructure Concept Plan⁸⁹ in respect of the site at Perryfields Road (BROM2) **[MM35; MM42(part)]**. These are needed for reasons of effectiveness.

140. The Council proposes to clarify that the dwelling numbers set out for

⁸⁷ SPG7 – document CDB14.5.

⁸⁸ Appendix A to document B1/1.

⁸⁹ Document CDB10.27.

Bromsgrove Town Expansion Sites BROM1-3 represent approximate figures rather than minimum targets. In view of the need for consistency, and bearing in mind the evidence base submitted in respect of the capacity of these sites, these changes [MM38-40] are recommended in order to be justified and effective.

141. Changes are also proposed to provide greater detail about the likely uses that are sought in site TC4 (Parkside Middle School) and the likely timing of the delivery of sites TC9 and TC10 (Mill Lane and Worcester Road Employment Area) [MM75; MM77]. These reflect more recent information and are necessary in order for the allocations to be justified.

Meeting the Needs of the Borough of Redditch

142. As described earlier in this report, the BDP identifies three sites to meet the needs of the Borough of Redditch – two in policy RCBD1.1 (Foxlydiate and Brockhill) and one in policy BDP5B (the Ravensbank employment allocation). **Ravensbank** has already been considered in this report. As already noted, it occupies an existing ADR and is well related to existing employment areas. As also discussed, changes are proposed to clarify its relationship to heritage assets. Subject to these I am satisfied that the site has been appropriately identified.
143. Notwithstanding that it represents a Green Belt deletion, the site at **Brockhill** (policy RCBD1.1, site 2) has proved to be uncontroversial in this examination. As already discussed, it relates well to the existing urban fabric of the town and has relatively easy access to the town centre. A strong Green Belt boundary can be established. There are limited environmental constraints and there is no evidence that heritage assets would be adversely affected. The site adjoins an ADR within Redditch Borough enabling a co-ordinated cross-boundary development to be achieved. For these reasons, and bearing in mind both the need for housing within Redditch described in my report on the BORLP4 examination and the site selection exercise described above I consider that exceptional circumstances are demonstrated to justify the site's removal from the Green Belt, in line with paragraph 83 of the Framework.
144. As also discussed, the proposed allocation at **Foxlydiate** (policy RCBD1.1, site 1) has been the subject of a considerable amount of local objection. However, for the reasons set out above, I am satisfied that its selection is appropriately justified. Nevertheless, it is necessary to consider a number of the concerns that have been raised about the details of the proposed allocation. Some, such as agricultural land quality, are discussed above. Additional comments are made here in respect of heritage assets, flood risk & groundwater issues, Green Belt issues, landscape, transport and deliverability. They take account of a statement of common ground that has been agreed between both Councils and the site's promoters⁹⁰. This sets out areas in which the parties are in agreement and makes reference to a number of other supporting documents: in addition to those mentioned elsewhere in this report, these

⁹⁰ Documents ED/47-47a.

include a Landscape and Visual Impact Assessment, a Utilities Infrastructure Report, a Community Infrastructure and Baseline Requirements Report, a Geo-Environmental Desk Study and investigation of the Hawthorne Pit, a Noise Mitigation Report, an Ecological Validation Report and various protected species surveys.⁹¹ Although these documents generally post-date the Plan's submission, they amount to a comprehensive evidence base in respect of the proposed allocation.

145. My Post-Hearings Note to the Councils dated 10 July 2015 set out a number of concerns about the treatment of potential effects to the heritage assets identified at Hewell Grange. The concerns in respect of the Brockhill West 'omission site' are outlined in an earlier section of this report. However, I also raised a concern that the Foxlydiate site had not been subject to the same amount of assessment in respect of those assets as had Brockhill West. Specifically, it had not been treated in depth in the initial version of the Hewell Grange Estate: Setting of Heritage Assets Assessment (HGESHAA). Given that the boundary of the Foxlydiate allocation extends very close to the boundary of the Conservation Area and RPG, this appeared inconsistent.
146. In response, the Council updated the HGESHAA to include consideration of Foxlydiate. A statement of harm versus public benefits was also prepared⁹². These were discussed at a resumed hearing in March 2016. In summary, the Council accepts that development within the Foxlydiate site has the potential to result in less than substantial harm (in the terms of the Framework) to the significance of relevant heritage assets at Hewell Grange – specifically the Conservation Area, RPG and the grade II listed water tower. A separate assessment⁹³ reaches a similar conclusion in respect of the grade II listed building at Lanehouse Farm, which adjoins the Foxlydiate site.
147. With reference to these assessments the Council considers that the identified harm can be mitigated by ensuring that development is positioned away from the heritage assets. Areas of 'non-development' are highlighted⁹⁴. In respect of Hewell Grange, these relate to land at the northern end of the site allocation, in particular a section rising to a broad ridge to the south-west of the A448. In respect of Lanehouse Farm, an area is identified to the north and west of the farm. The Council proposes to add text to policy RCBD1.1 to require development of the Foxlydiate site to conform with policy BDP20 and to be 'informed by an understanding of the Setting of Heritage Assets Assessments'.
148. To my mind, this suggested wording is insufficiently robust. Given that the Council's evidence, and specifically its view on the planning balance required by paragraph 134 of the Framework, is based upon development not taking place in the 'no development' areas indicated above, I consider it necessary for soundness reasons that adherence to the recommendations of these

⁹¹ Documents XB1/2n, XB1/2c, XB1/2d, XB1/2k, XB1/2m, XB1/2j, XB1/2g-i, XB1/2l and XB1/2s respectively.

⁹² Document OED/46g.

⁹³ Document OED/46c.

⁹⁴ These are all shown on Map 2 of the Lanehouse Farm assessment – document OED/46c.

assessments is referenced more clearly. Subject to that change, included in **[MM51]**, I am satisfied that the public benefits of the proposed allocation are sufficient to outweigh the harm that has been identified. It is noted that the emerging masterplan for development of the Foxlydiate site⁹⁵ broadly avoids development in these areas. Bearing that in mind, I have seen no substantive evidence that restricting development in these areas would materially affect either the capacity or deliverability of the site as a whole.

149. The promoter of the Foxlydiate development has also submitted an assessment of the site's development on Norgrove Court⁹⁶. This is a grade I listed building located to the south of the site in the Borough of Redditch, with a grade II listed building (The Old Cottage) nearby. Both lie within a natural hollow. The assessment concludes that as a result of the degree of separation between the site and these heritage assets, as well as the specific characteristics of their setting (such as topography), development of the site would have a neutral effect on the assets' significance. Bearing in mind my own observations about the mutual separation of the proposed allocation and these heritage assets I have no reason to take a different view.
150. As already discussed, neither the EA nor STW object to the principle of the Foxlydiate allocation. However, initial concerns were expressed by both bodies, and continue to be expressed by local objectors. These relate to three main matters: flood risk within the site, the potential to exacerbate flooding away from the site (including downstream settlements such as Feckenham) and the effects on groundwater abstraction. I consider each in turn.
151. Foxlydiate has been the subject of a site-specific Flood Risk Assessment (FRA)⁹⁷. This shows that the site predominantly lies within Flood Zone 1 (low probability of flooding), with small areas of Flood Zones 2 and 3 along the line of the Spring Brook. Given the limited extent of this constraint, it is clear that this does not amount to a significant restriction on development: as suggested by the FRA, the relevant areas can lie within the site's green infrastructure. However, as noted above, the Council proposes (in consultation with the EA and STW) to include an additional policy safeguard in respect of this matter **[MM51(part)]**.
152. In respect of off-site flood risks, the Framework states (among other matters) that local plans should use opportunities offered by new development to reduce the causes and impacts of flooding and that when determining planning applications local planning authorities should ensure flood risk is not increased elsewhere⁹⁸. Policy BDP23 includes broadly similar provisions. The FRA recommends a drainage strategy that would maintain existing discharge rates from the site while accounting for an additional 30% rainfall as a result of climate change. The Council proposes to include additional wording to ensure that surface water run-off is managed to prevent off-site flooding and, as

⁹⁵ Appendix 1 of document S/4.

⁹⁶ Appendix 2 to document XB/1.2t.

⁹⁷ Document XB1/2f.

⁹⁸ Paragraphs 100 and 103.

already discussed, to impose the optional water efficiency standard on residential development **[MM51(part)]**.

153. STW has a public water supply groundwater source at Curr Lane. The Foxlydiate site occupies all of the EA defined Source Protection Zones (SPZ) 1 and 2 and the most significant inner part of SPZ 3 designated by the EA: STW has confirmed that no development should be undertaken in SPZ 1 and that no or very light development should take place in SPZ 2⁹⁹. Given the overall size of the proposed allocation, I see no reason why such constraints would not preclude development of the site as a whole. The Council (in consultation with STW and the EA) proposes to add further safeguards to policy RCBD1.1 in respect of this matter, addressing both the implications of new development and of the above-noted surface water drainage requirements **[MM47; MM51(part)]**.
154. Clearly, the Foxlydiate allocation represents a substantial loss of Green Belt land. However, this would also apply to the alternative large site at Bordesley as discussed above. The potential to establish strong Green Belt boundaries was examined for both sites in the HGDS. At Foxlydiate, the A448 dual carriageway – including trees along the road verge – forms a particularly well-defined north-eastern edge to the site. To the south and west, Pumphouse Lane, the Spring Brook, Curr Lane and Gypsy Lane also form strong boundaries. While the field boundaries at the northern end of the site are less obvious features on the ground, the ridge described above provides additional topographical definition. This also provides some visual separation between the site and Tardebigge. Overall, I agree with the Councils that strong and defensible Green Belt boundaries can be established for the allocation.
155. It has been suggested that the areas required for safeguarding in respect of nearby heritage assets (see above) should be retained within the Green Belt. However, as is shown by the emerging masterplan, they are integral to the larger development area. While their safeguarding is necessary in respect of the heritage assets, it has not been shown that they would contribute to the purposes of including land within the Green Belt. Furthermore, as described above, I am satisfied that the allocation as a whole would retain strong and defensible Green Belt boundaries.
156. For these reasons, and taking into account the need for housing within Redditch and the site selection exercise described above, I am satisfied that exceptional circumstances exist to justify the site's removal from the Green Belt, in line with paragraph 83 of the Framework.
157. In part, the transport implications of the Foxlydiate development have been considered within the wider transport evidence referred to above. As already noted, there are no objections from either Highways England or WCC as the local highway authority. However, a significant amount of additional site specific evidence has also been submitted¹⁰⁰. In summary, this demonstrates

⁹⁹ Appendix B of document XB1/2f.

¹⁰⁰ Including documents CDX1.31-1.34 and XB1/2b.

that, subject to various mitigation measures, development of the site would be deliverable in transport terms. Such mitigation would need to include significant improvements in public transport resulting in integrated and regular bus services – as is required by policy RCBD1.1. Full use should be made of existing walking and cycling routes – including those that already cross the site. However, it is recognised that further work is needed to establish the full details of required mitigation strategies. The Council proposes to add further requirements to policy RCBD1.1 in that regard, and also to clarify that necessary infrastructure should be delivered in parallel with the new development **[MM51(part)]**.

158. Other parties have queried the deliverability assumptions that underpin the Foxlydiate development. However, details have been submitted by the intended developer in respect of likely delivery rates, including a phasing plan¹⁰¹. The suggested annual yield of approximately 120 private dwellings per year is within the rate of other broadly comparable developments in the locality (as discussed above). At the time of writing an outline planning application has been submitted. Taken together these factors support the Council's assumptions in respect of the delivery of housing from this site.

159. The Council proposes to clarify that the dwelling numbers set out for the sites at Foxlydiate and Brockhill (RCBD1.1 Sites 1 and 2) represent approximate figures rather than minimum targets. In view of the need for consistency, and bearing in mind the evidence base submitted in respect of the capacity of these sites, these changes **[MM48-50]** are recommended in order to be justified and effective.

Conclusion – Main Issue 7

160. For these reasons, and subject to the changes listed above, I conclude that the allocated sites are appropriate and deliverable, the detailed requirements for the allocations are clear and justified and the boundaries and extent of the sites are correctly defined.

Other Matters

161. Appendix 4 of the BDP sets out a list of those policies and proposals of the Bromsgrove District Local Plan (adopted 2004) (BDLP). This includes references to policies being 'partially replaced' and 'partially superseded'. However, it is intended that no part of the BDLP will remain extant following the adoption of the Bromsgrove District Plan. Additional text is proposed to clarify this **[MM100]** which is necessary for reasons of effectiveness.

Assessment of Legal Compliance

162. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

¹⁰¹ Appendices 2 and 3 of document S/4.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The BDP has been prepared in accordance with the approved LDS (July 2016).
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in September 2006 ¹⁰² and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed main modification changes (MM)
Sustainability Appraisal (SA)	As is described in the main body of this report, SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations Assessment Screening Report (September 2013) ¹⁰³ sets out why a Stage II AA is not required.
National Policy	The Bromsgrove District Plan complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The Bromsgrove District Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

163. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

164. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Bromsgrove District Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

M J Hetherington

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications

¹⁰² Document CDB4.6.

¹⁰³ Document CDB3.10.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and *italics* for additions of text, or by specifying the modification in words in [**bold text in square brackets**].

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text. Further renumbering of pages and paragraphs will be required as a consequence of these modifications.

Ref	Page	Policy/ para	Main Modification
MM1	3	Introduction and Context 1.7	<p>The Plan includes:</p> <ul style="list-style-type: none"> • A District Profile which describes Bromsgrove as it is at the moment • 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 and achieve the vision • 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. <p>The IDP is at present in draft and as a 'live' document and will be updated before Submission of the Plan. The draft IDP can be found as a separate document.</p>
MM2	10	District Profile 2.28	Due to the District's close proximity to the West Midlands conurbation, many inhabitants in Bromsgrove <i>District</i> commute to work in Birmingham, <i>the Black Country and Solihull</i> .
MM3	12	Vision 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, <i>including the needs of the elderly population</i> .
MM4	13	Vision 4.12	<p><i>Following the Local Plan Review, the Green Belt boundary boundaries will remain unchanged⁸ and until 2030 and beyond.</i> 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.</p> <p>8. Subject to Redditch Cross Boundary Sites and full Green Belt Review by 2030</p>
MM5	17	BDP1.3	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,

Appendix

Ref	Page	Policy/ para	Main Modification
			designated Heritage Assets and locations at risk of flooding.
MM6	17	BDP1.4	Accessibility to public transport options and the ability of the local <i>and strategic</i> road networks to accommodate additional traffic;
MM7	17	BDP1.4	d) The quality of the natural environment including any potential impact on biodiversity, <i>water quality, geodiversity</i> , landscape and the provision of/and links to green infrastructure (GI) networks;
MM8	18	BDP2 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. <i>To reflect the need to boost housing the four facets of housing delivery set out in the policy are not set out in a priority order as it is recognised that all four will have an important role in delivering housing.</i> Until a Green Belt Review <i>and Local Plan Review</i> is carried out it is considered desirable for village envelope boundaries to remain unchanged.
MM9	19	BDP2	<p><i>BDP2.1 Initially</i> There there will be four main facets to the delivery of housing in <i>to meet the needs of Bromsgrove District</i> consisting of the following:</p> <p>a) BDP2.1 Development of previously developed land or buildings within existing settlement boundaries which are not in the designated Green Belt;</p> <p>b) BDP2.2 Expansion Sites around Bromsgrove Town (as identified in BDP 5A);</p> <p>c) BDP2.3 Development Sites in or adjacent to large settlements (as identified in BDP 5B); <i>and</i></p> <p>d) BDP.2.4 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.</p> <p><i>Proposals for development for needs arising outside the District will be fully justified and based on principles of sustainable development and evidence indicating the most appropriate location for such development across the West Midlands area.</i></p> <p>BDP2.2 BDP2.5 Proposals for new development <i>for Bromsgrove's needs</i> should be located in accordance with the District's settlement hierarchy as shown in table 2 on page 20 <i>within this policy if up to date evidence supports this.</i> This will ensure that development contributes to the regeneration priorities for the area, preserves the attractiveness of the environment, reduces the need to travel <i>and implications for the local and strategic road network</i>, 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.</p>

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Ref	Page	Policy/ para	Main Modification
			<p>BDP2.6 The Settlement Hierarchy outlined above will provide the guiding principles in terms of sustainability for the proposed Green Belt Review sequential testing as outlined in BDP4 Green Belt.</p> <p>BDP2.7 The 'village envelope' i.e. 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.</p> <p>[Table 2 (page 20) District's Settlement Hierarchy: Layout and design to clarify that table 2 falls within policy BDP2]</p>
MM10	20	BDP2 table 2 2 nd Column – Large Settlements	<p>Alvechurch Barnt Green (<i>including Lickey</i>) Catshill Hagley Rubery Wythall (<i>including Drakes Cross, Grimes Hill and Hollywood</i>)</p>
MM11	20	BDP2, Table 2 3 rd Column	<p>Suitable development</p> <p>Comparison and convenience retail (to meet District requirements and needs)</p> <p>Commercial leisure – restaurants, cafes pubs and bars</p> <p>Office</p> <p>Residential development of a scale proportional to the sustainability of the settlement</p> <p>Hotels/guest houses</p> <p>Employment</p> <p>Leisure/culture i.e. churches, health centres, libraries, public halls etc</p> <p>Major services</p> <p>Convenience A1 retail (to meet needs of the specific village)</p> <p>Local services</p> <p>Residential development of a scale proportional to the sustainability of the settlement</p> <p>Small scale business/office development</p> <p>Leisure/culture i.e. churches, health centres, libraries, public halls etc</p> <p>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</p> <p>Local services</p>

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			Small scale rural employment in appropriate circumstances. More limited local services for example, local convenience shop/post office or public house																
MM12	20	BDP2 Table 2 – Small settlement	Small 'Settlement' ⁴⁰ (population circa 50-2500) 10. Villages highlighted in blue are subject to a village envelope																
MM13	21	BDP3 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 a migration led and employment constrained scenarios which identified a net dwelling requirement for the period 2011-2030 of 6,980 and 6,780 respectively. <i>However to ensure the evidence is robust and up to date further demographic forecasts have been completed. Based on the demographic scenarios run, it is considered that the figure of 6,648 would represent the Objectively Assessed housing need and a figure of 7,000 over the period 2011-2030 meets the full housing requirement of the District. The Council is committed to significantly 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.</i>																
MM14	21	BDP3 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 30-40 dwellings per annum should be included.																
MM15	21	BDP3 8.22	The sites and associated development trajectories identified in the SHLAA highlight that approximately 4,600 4,700 homes will be delivered in the period up to 2023 over the plan period without development in the Green Belt. This equates to the equivalent of a 12-7 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 600 700 is primarily due to the inclusion of a windfall allowance. The breakdown of the types of sites contributing to the 4,600 4,700 total is detailed in the table below:																
MM16	21	BDP3 table	<table> <thead> <tr> <th>Source of Supply</th> <th>No. of Dwellings</th> </tr> </thead> <tbody> <tr> <td>Net Completions (2011-136)</td> <td>1124 386</td> </tr> <tr> <td>Net Commitments</td> <td>1092 12 4052</td> </tr> <tr> <td>Bromsgrove Expansion Sites</td> <td>1790 2406</td> </tr> <tr> <td>Remaining Development Sites</td> <td>66 479</td> </tr> <tr> <td>Other SHLAA Sites</td> <td>97 421</td> </tr> <tr> <td>Windfall Allowance</td> <td>560 (40 x 14 yrs) 480</td> </tr> <tr> <td>TOTAL:</td> <td>4729 4624</td> </tr> </tbody> </table>	Source of Supply	No. of Dwellings	Net Completions (2011-136)	1124 386	Net Commitments	1092 12 4052	Bromsgrove Expansion Sites	1790 2406	Remaining Development Sites	66 479	Other SHLAA Sites	97 421	Windfall Allowance	560 (40 x 14 yrs) 480	TOTAL:	4729 4624
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MM17	21	Footnote 12 page 21	12 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) and Norton Farm (Bromsgrove).
MM18	21	BDP3 8.23	It is clearly essential that a A full Green Belt Review will be is undertaken following the adoption of this Plan to ensure that land can be identified and allocated <i>through a Local Plan Review. This will ensure that the remaining 2,400 2,300 homes can be delivered and additional sites then allocated in the Local Plan Review. The timing of this review will be determined by updated evidence such as, the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory. This will ensure guarantee that land can be identified and allocated to ensure that the remaining 2,400 2,300 homes can be delivered. This will ensure that the Council is in a position to achieve the housing target of 7,000 by 2030. The review will be completed by 2023 at the latest.</i>
MM19	22	BDP 3 Future Housing and Employe nt Growth table	Dwellings outside Green Belt 4600-4700 Green Belt Review 2400-2300
MM20	22	8.25	As mentioned above the Council has a duty to co-operate 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 helping to meet the growth needs of Birmingham with the 700 houses currently being developed on the former MG Rover plant at Longbridge. It is therefore considered that cross-boundary growth in relation to Birmingham is already being partly addressed and can be further addressed through the full Green Belt <i>and Local Plan Review.</i>
MM21	22	BDP3 (table)	Dwellings outside the Green Belt 4,700 4,600 2011-2023 30
MM22	22	BDP3.1	It is proposed that prior to 2023 a A full Green Belt Review will have been completed be carried out and further sites will have been be allocated <i>within a Local Plan Review</i> to contribute approximately 2,400 2,300 dwellings towards the 7,000 target. <i>The timing of this review will be determined by updated evidence including the GBSLEP Strategic Housing Needs Study and</i>

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			<i>the monitoring of housing delivery against the Council's projected housing trajectory. The review will be completed by 2023 at the latest.</i>
MM23	22	BDP 3.3	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).
MM24	23	BDP4 8.28	In advance of 2023, a A Green Belt Review will <i>therefore</i> be undertaken which will remove and then through a review of the Local Plan sufficient land will be removed from the Green Belt to deliver the remaining 2,300 2,400 homes in the period up to 2023 -2030 and address the longer term development needs of Bromsgrove District and adjacent authorities based on the latest evidence at the time. <i>The timing of this review will be determined by updated evidence including the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory.</i> The Green Belt Review will take account of: the need to accommodate 2,300 2,400 dwellings in the period up to of 2023 to 2030
MM25	23	8.29	The Green Belt Review will follow the approach in the settlement hierarchy (BDP2) for Bromsgrove related growth as follows: <ul style="list-style-type: none"> • Significant growth in Bromsgrove Town • Some growth in large settlements • Limited opportunities for growth in small settlements
MM26	24	BDP4 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. <i>The ongoing GBSLEP Strategic Housing Growth Study will provide further evidence to help address this matter.</i>
MM27	24	8.34	The NPPF states that the extension or alteration of a building in the Green Belt is not inappropriate provided that it does not result in disproportionate additions over and above the size of the original building 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 ² (i.e. the original dwelling plus extension). <i>However, the Council acknowledges that a greater degree of extension may be allowed under Permitted Development rights.</i> Only extensions built before 1st 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

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			the identified thresholds will be viewed as inappropriate development and would therefore only be permitted where very special circumstances exist.
MM28	25	BDP4.2	A Local Plan Review including a full Review of the Green Belt will be undertaken <i>in accordance with policy BDP3</i> in advance of 2023 to identify...
MM29	25	BDP4.2	a) Sufficient land in sustainable locations to deliver approximately 2,300 2,400 homes in the period <i>up to 2023-2030</i> 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 <i>District</i> and adjacent authorities based on the latest evidence;
MM30	25	BDP4.2	c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period ie. up to 2030. <i>The timing of the Green Belt Review will be determined by updated evidence including the GBSLEP Strategic Housing Needs Study and the monitoring and housing delivery against the Council's projected housing trajectory. The outcomes of the Green Belt Review will then be incorporated into the Local Plan Review.</i>
MM31	25	BDP 4.3	BDP4.3 The Green Belt boundary review will follow <i>sustainable development principles</i> the approach in BDP2 Settlement Hierarchy and take into account <i>up to date</i> evidence and any proposals in Neighbourhood Plans. Where appropriate, settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development.
MM32	25	BDP 4.4 b)	b) Appropriate facilities for outdoor sport, and outdoor recreation, and 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;
MM33	25	BDP4.4 c)	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 ² (<i>'original' dwelling plus extension(s)</i>) <i>provided that this scale of development has no adverse impact on the openness of the Green Belt;</i>
MM34	25	BDP4.4 e)	e) The replacement of a building of , 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 <i>it replaces</i>
MM35	27	BDP5A 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. <i>The Perryfields Green Infrastructure Concept Plan identifies the green infrastructure assets and spatial patterns that give rise to opportunities for a</i>

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			<i>connected and multifunctional green infrastructure network in BROM2. The development principles demonstrate how best practice for the development and management of green and blue infrastructure can be applied on the ground and the Council expects the principles be applied to inform the detailed masterplanning in BROM2.</i>
MM36	27	8.52	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.
MM37	28	BDP5A 8.54	<p>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.</p> <p><i>The three sites have a sensitive hydrogeological setting¹⁵. They fall within Source Protection Zones 1, 2 and 3 and there are qualitative and quantitative issues associated with the groundwater body and receiving river water body (the Battlefield Brook). BROM3 also has historic landfill¹⁶. The chemical and quantitative status of the groundwater body is poor under the Water Framework Directive (WFD) and the aquifer below the site is over abstracted which is causing low flows in the Battlefield Brook. Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to controlled waters and address the environmental impact associated with over abstraction. For example, to achieve the water quality objective of the WFD, SuDS on the sites may need to provide multiple levels of treatment. To address the quantitative issues with the waterbodies, SuDS should be designed so to maximise recharge to the aquifer and support water levels in the Battlefield Brook. The development principles in the blue infrastructure section of the Perryfields Green Infrastructure Concept Plan are also applicable to BROM3.</i></p>

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			<p>¹⁵ Map of the extent of the Source Protection Zones and location of landfill is available at: http://maps.environment-agency.gov.uk</p> <p>¹⁶ Map of the sites geology is available at: http://mapapps.bgs.ac.uk/geologyofbritain/home.html</p>
MM38	29	BDP5A.2	Of this total allocation BROM1 will include approximately a minimum of 316 dwellings and associated community infrastructure that including public open space with play facilities.
MM39	29	BDP5A.3	BROM2 will contain approximately a minimum of 1300 dwellings, 5 hectares of local employment land (office and/or light industry), a local centre and community facilities.
MM40	29	BDP5A.6	BROM3 will include approximately a minimum of 490 dwellings and associated community infrastructure that should include public open space with play facilities and small scale local retail
MM41	29	BDP5A.7 b)	b) To address the housing needs of the elderly all dwellings should seek to achieve Lifetime Homes' Standards and BROM2 should contain an 'extra care' type facility of approximately 200 units;
MM42	30	BDP5A.7	<p>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. <i>The Council will expect the Perryfields Green Infrastructure Concept Plan be applied to inform the detailed masterplanning in BROM2;</i></p> <p>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);</p> <p><i>k) An appropriate assessment of the pollution risks to controlled waters will be produced taking account of any previous contaminative uses on the sites (including the historic landfill) and the risks associated with the proposed uses</i></p> <p>k) l) Flood risk from the Battlefield Brook on BROM2 and BROM3 should be managed through measures that work with natural processes to improve the local water environment addressed through flood management measures to protect and enhance the District's watercourses and enable development appropriate to the flood risk;</p> <p>m) SuDS proposals must provide an appropriate level of treatment to avoid pollution risks to controlled waters, and be designed to achieve the greenfield rate of run-off and support water levels in the Battlefield Brook. and surface water run off must be managed to prevent flooding on and around all of the sites through the use of SuDS. In accordance with the objectives of the</p>

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			Water Framework Directive, development should ideally <i>contribute towards the improvement of, but as a minimum not have a deteriorative effect on, the water bodies associated with the site; enhance, or at least not worsen, water quality</i>
MM43	32	BDP5B 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 9). <i>A Flood Risk Assessment will be required to support any planning application proposing the development of this site which reflects the principles and recommendations within the Council's Level 2 Strategic Flood Risk Assessment.</i>
MM44	32	BDP5B 8.66	Add text to end of paragraph: <i>Any planning application proposing the development of the remainder of this site should be supported by a Flood Risk Assessment which reflects the principles and recommendations for the site within the Council's Level 2 Strategic Flood Risk Assessment.</i>
MM45	33	8.67	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 8. 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. <i>The site is within the setting of Gorcott Hall, a Grade II* listed building. The Gorcott Hall Setting Assessment (Bromsgrove DC, 2014) has been prepared to inform the principle of development and its future form, and should be applied to ensure the significance of the Hall and its setting is conserved.</i> This site is part of the Redditch Eastern Gateway, a strategic employment site, which is being promoted by the Worcestershire Local Enterprise Partnership
MM46	34	BDP 5B	Insert Footnote: <i>To ensure protection of Gorcott Hall's significance, future proposals should be in conformity with Policy BDP20 and informed by an understanding the Hall's setting, mindful of the Gorcott Hall Setting Assessment (Bromsgrove DC, 2014) and English Heritage guidance on setting matters. Historic Environment Good Practice Advice Note 3 (GPA3) The setting of Heritage Assets (Historic England, March 2015) http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</i>
MM47	43	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. <i>The site has a sensitive hydrogeological setting and the aquifer below the site is over-abstracted. There are Source Protection Zones²³ 1, 2 and 3 located on the site and the historic landfill²⁴ presents a potential source of</i>

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			<i>contamination. Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to controlled waters and maximise recharge to the underlying aquifer. For example, to achieve the water quality objective of the WFD, SuDS on the site may need to provide multiple levels of treatment to avoid pollution risks. To address the quantitative issues with the groundwater body SuDS should be designed so to maximise recharge to the aquifer.</i>
MM48	45	RCBD1.6	Two mixed use urban extensions are proposed (as shown on Map 10 RCBD1 page 44) across two sites adjacent to Redditch and are appropriate to deliver a minimum of <i>approximately</i> 3400 dwellings and comprehensive provision of associated new infrastructure to meet some of Redditch's housing requirements up to 2030.
MM49	45	RCBD1.7	Site 1 Foxlydiate will include a minimum of <i>approximately</i> 2800 dwellings, a first school and a Local Centre, including associated community infrastructure.
MM50	45	RCBD1.8	Site 2 Brockhill will contain a minimum of <i>approximately</i> 600 dwellings which will integrate with the Strategic Site at Brockhill East, as shown in the <i>Borough of Redditch Local Plan No.4</i> and should integrate well into the existing urban fabric of Redditch.
MM51	45-46	RCBD1.9	<p>II. An overall Transport Assessment will be produced taking into account of <i>the prevailing traffic conditions and the individual and the cumulative and wide-ranging</i> effects of development on transport infrastructure. <i>This will define the mitigation necessary to protect the safety and operation of the road network, including sustainable travel measures and any including new and improved access arrangements. which are in keeping with the structured road hierarchy.</i></p> <p>III. 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 <i>accessible to the a bus network stop.</i></p> <p>VI. 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. <i>A detailed, site specific, Flood Risk Assessment will be required. This should provide a model of the nearby ordinary watercourses to ascertain the design flood extents, including the 1% plus climate change allowances, and determine the developable area of the site. This will inform the sequential approach and the need to include any necessary avoidance or mitigation measures such as the incorporation of open space and green infrastructure within the floodplain regime. Surface water runoff must be managed to prevent flooding on, around and downstream of both sites through the use of Sustainable Drainage Systems (SuDS).</i> Surface water runoff must be managed to</p>

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			<p>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.</p> <p><i>VII. Water efficiency measures will meet the tighter Building Regulations optional requirement of 110 litres per person per day.</i></p> <p><i>VIII. SuDS proposals on Site 1 must provide an appropriate level of treatment to avoid pollution risks to controlled waters, and be designed to achieve the greenfield rate of run-off, maximise recharge to the underlying aquifer and support water levels in the Bow Brook. In accordance with the objectives of the Water Framework Directive, development should ideally contribute towards the improvement of, but as a minimum not have a deteriorative effect on, the water bodies associated with the site.</i></p> <p><i>IX An appropriate assessment of the pollution risks to controlled waters on Site 1 Foxlydiate will be produced taking account of any previous contaminative uses on the site including the historic landfill, and the risks associated with the proposed uses</i></p> <p>VII-X 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.</p> <p><i>XI Supporting developments that follow the water conservation hierarchy: 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.</i></p> <p>VIII <i>XII. 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.</i></p> <p>IX <i>XIII. In preparing Development proposals should incorporate, provision should be made for any necessary infrastructure to be delivered in parallel with the implementation of new development for the effective delivery of the site.</i></p> <p>X <i>XIV. 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</i></p>

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			<p>impede the delivery of the two sustainable communities.</p> <p><i>XV. To ensure the protection of Heritage Assets, future proposals including development boundaries should be in conformity with Policy BDP20 and informed by an understanding of the Setting of Heritage Assets set out in the most recent Setting Assessment(s) produced, or formally endorsed, by the Council in accordance with current Historic England guidance. Specifically, built development should not take place in the 'no development' areas identified in the Hewell Grange and Lanehouse Farm Setting of Heritage Assets Assessments (both dated December 2015).</i></p>
MM52	47	BDP6	<p><i>BDP6.1 Financial contributions towards development and infrastructure provision will be coordinated to ensure that growth in the District is supported by the provision of infrastructure (including Green 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.</i></p> <p><i>BDP6.2 Irrespective of size, development will provide, or contribute towards the provision of:</i></p> <ul style="list-style-type: none"> • 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) <p><i>BDP6.3 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. Prior to this, contributions will be sought on a case by case basis in line with relevant policy and guidance.</i></p>
MM53	49	BDP7.1	<p>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 of 10 or more dwellings it is accepted that a wider mix of dwelling types will may be required.</p>
MM54	52	BDP8.1	<p><i>BDP8.1 Contributions towards affordable housing provision will not be sought from developments of 10 units or less, and which have a maximum combined gross floorspace of 1000 sqm. Where there is a net increase of 11 40-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:</i></p> <ul style="list-style-type: none"> • Up to 40% affordable housing (or a higher % if proposed) on greenfield sites or any site accommodating 200 or more dwellings; • Up to 30% affordable housing (or a higher % if proposed) on brownfield sites accommodating less than 200 dwellings <p><i>BDP8.2 In exceptional circumstances where the applicant can fully</i></p>

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			<p>demonstrate that the required target cannot be achieved the Council may negotiate a lower provision.</p> <p>BDP8.3 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</p> <p>BDP8.4 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.</p> <p>BDP8.5 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.</p> <p>BDP8.6 To create mixed and balanced communities affordable housing should be distributed throughout new developments and not be visually distinguishable from market housing.</p> <p>BDP8.7 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.</p>
MM55	53	8.116	<p>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</p>
MM56	56	BDP10 8.125	<p>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.</p>
MM57	56	8.126	<p>The Joseph Rowntree Foundation in association with the Habinteg Housing Association (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.</p>
MM58	56	BDP10.2	<p>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.</p>

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MM59	56	BDP10.3	The Council will, through the identification of sites and/or granting of planning consents in sustainable locations, provide for the <i>a wide range of elderly accommodation including the</i> 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.
MM60	57	8.129	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. The 2014 Gypsy and Travellers Accommodation Assessment (GTAA) shows that there is no overall shortfall of permanent pitches for Gypsies and Travellers across Worcestershire over the next five years up to 2018/19. Bromsgrove has sufficient capacity to cover identified requirements up to 2018/19. 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 over the five year period 2014/15 to 2018/19
MM61	57	8.130	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, the 2014 GTAA indicates a need for permanent pitches after 2019/20. this situation could potentially change in the period up to 2030 once the new GTAA has been completed. Therefore, it will be necessary pertinent to consider whether sites for gypsies and travellers will need to be identified as part of the proposed Local Plan Green Belt Review.
MM62	57	BDP11.3	If additional sites are required land will be identified through a <i>Local Plan</i> full Green Belt Review.
MM63	59	BDP12.2	Add new paragraph: <i>BDP12.3 When applying these tests to specific proposals the Council will have full regard to the specific characteristics, needs, service priorities and objectives of the service and/or organisation concerned.</i>
MM64	67	BDP15.1 k)	Small scale renewable energy projects, <i>excluding wind energy developments</i> , and business to serve the industry
MM65	72	8.194	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) <i>or such relevant updates to these documents.</i>
MM66	73	BDP16.2	<i>Financial</i> contributions from developers will be sought for new development in respect of investment in public transport, pedestrian, cycle and highways

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			infrastructure as detailed by the draft Bromsgrove Infrastructure Delivery Plan in conjunction with policy BDP6 Infrastructure Contributions
MM67	74-75	BDP17 8.201 & 8.202	<p>A Retail Capacity Assessment was completed in 2004 which was updated in 2007 and 2010. An update to the 2010 assessment is expected in 2013 to identify the retail needs for Bromsgrove District up to 2030. The most recent assessment will take into consideration new retail stores that had received Planning Consent, including Sainsbury's and Aldi. Key assumptions and data sources underpinning the 2010 update will be revisited in light of the current economic climate.</p> <p>The Bromsgrove Town Retail Capacity Assessment will include a household survey to inform the needs assessment; this provides an up-to-date picture of trading patterns. The tested assumptions will provide a forecast of comparison and convenience floorspace capacity in Bromsgrove over 5 year periods (2013, 2018, 2023 and 2028). Recommendations on the level of retail expansion that could be supported and the type and format of floorspace that can be accommodated will be provided. Over the plan period there is likely to be limited need for further convenience retailing floorspace. Whilst limited need, convenience retail development may support the viability of other schemes and may contribute to the regeneration of the town centre. In terms of comparison retail floorspace there is a likely need for additional comparison retail floor space up to 2030.</p> <p><i>A Retail Capacity Assessment was completed in 2004 which was updated in 2007 and 2010. An updated retail study was then published in October 2013 to identify the retail needs for Bromsgrove District to 2030. This assessment took in to consideration new retail stores that had received planning permission, including Sainsbury's and Aldi, the latter of which is complete and trading.</i></p> <p><i>The Bromsgrove Town Retail Capacity Assessment included a household survey to inform the needs assessment; which provided an up-to-date picture of trading patterns. The tested assumptions provided a forecast of comparison and convenience floorspace capacity in Bromsgrove up to 2030. The NPPF makes it clear that the identified need for retail uses should be met in full and should not be compromised by limited site availability. As a result of the retail capacity assessment, it was concluded that there will in fact be a slight oversupply of convenience retail up to 2030 and a relatively small requirement for comparison floorspace of some 16,300m² (gross). Whilst limited need, convenience retail development may support the viability of other schemes and may contribute to the regeneration of the town centre. The retail assessment also surveyed local centres across Bromsgrove and did not suggest any major qualitative deficiencies and, in any case, most lacked major development opportunities. The study therefore recommended that most new development, particularly comparison goods floorspace, is</i></p>

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			<i>directed towards Bromsgrove town centre, in order to consolidate its role as a centre which serves residents in the area immediately surrounding it.</i>
MM68	78	BDP17 8.223	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 <i>poor water quality and its unnatural form.</i>
MM69	78	8.224	Add new paragraph: <i>Parts of the Town Centre Regeneration Area (including sites TC1, TC9 and TC10) are located in Flood Zone 2 (medium probability) and Flood Zone 3 (high probability) on the Environment Agency's Flood Map which, in this location, is based on a national, generalised mapping technique. This type of modelling does not include the impacts of structures such as culverts and bridges on the flooding regime. As the Spadesbourne Brook is currently impacted by long culverts, crossings and heavily engineered banks at the open sections, a detailed flood risk assessment (including hydraulic modelling) will be required for the delivery of sites within the flood risk areas. Such proposed redevelopment should also provide betterment and take the opportunity to re-establish an open and more natural river course with a simplification of the number of crossings.</i>
MM70	78	8.226	The Historic Market Site Proposals for a mixed use development are currently expected. The development proposals are expected to include shops, restaurants and a 5 screen cinema. <i>As the site is next to the Spadesbourne Brook where flooding is an issue, the design and layout of the development should be informed by a detailed flood risk assessment including hydraulic modelling.</i>
MM71	79	BDP17 8.236	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. <i>This site is identified as a long-term redevelopment opportunity post 2031 and its risk of flooding will be assessed in the future strategic flood risk assessment. Should development come forward in this plan period, the design and layout of the development should be informed by a detailed flood risk assessment including hydraulic modelling.</i>
MM72	79	BDP17 8.237	The Council wishes to maintain a substantial element of employment opportunities in and around the Town Centre and as such the focus for any

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			<p>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 <i>have recently faced</i>. 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. <i>This site is identified as a long-term redevelopment opportunity post 2031 and its risk of flooding will be assessed in the future strategic flood risk assessment. Should development come forward in this plan period, the design and layout of the development should be informed by a detailed flood risk assessment including hydraulic modelling.</i></p>
MM73	81	BDP17.2.1	<p>BDP17.2.1 Bromsgrove District has a likely need for additional comparison floorspace of <i>some 16,300m² (gross)</i> and limited need for further convenience floorspace up to 2030. Although where positive effects on the viability of regeneration schemes can be demonstrated, further convenience floorspace may be allowed in such circumstances.</p>
MM74	81	BDP17.2.2	<p>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:</p> <ul style="list-style-type: none"> 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. d) <i>A wide range of appropriate Town Centre uses would be supported at first floor level in the Town Centre including office, retail and residential.</i> <p>The Council will:</p> <ul style="list-style-type: none"> d-e) 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-f) 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-g) Continue to support small specialist shops, whilst creating opportunities for new retailers to enter the Town; and seek to offer new opportunities for

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			<p>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.</p> <p>g h) Protect and enhance all existing public open spaces within the Town Centre with specific proposals for enhancements on The High Street, The Spadesbourne Brook and The Recreation Ground.</p> <p>h i) 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. <i>There will be a focus on achieving a safe, balanced and socially responsible evening economy and therefore proposals must demonstrate that whether on its own or cumulatively with other uses, they do not create an unacceptable impact on neighbouring uses by reason of noise pollution, light pollution or disturbance.</i></p> <p>j) 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.</p>
MM75	84	Table 5	<p>TC4 Parkside Middle School 0.7 Office led <i>Civic Centre</i> with public library and job centre Application pending Full Planning Permission</p> <p>TC9 Mill Lane 0.2 Retail led mixed use Long term opportunity <i>post 2030</i></p> <p>TC10 Worcester Road Employment Area 2.3 Employment led Long term opportunity <i>post 2030</i></p>
MM76	84	BDP17.8 TC1	<p>F. A flood risk assessment will be required to address flood risk from the Spadesbourne Brook and appropriate mitigation implemented where necessary. The watercourse must also be considered as part of the public realm element of any proposals, including provision for enhanced walking and cycling opportunities.</p> <p>I. An appropriate assessment of flood risk must be carried out including the hydraulic modelling of the Spadesbourne Brook through the site.</p>
MM77	85	BDP17.11 TC4	<p>The former Parkside Middle School is a Grade II Listed Building and therefore would have to undergo sympathetic conversion and extension for development potential to be realised. The following development principles will apply:</p> <p>A. Office conversion is considered to be the most suitable use, although other uses may be acceptable. <i>Change of use to Civic Centre, library and job centre with other associated uses.</i></p> <p>B. Full regard to the buildings listed status will be essential for all proposals.</p> <p>C. Development will be required to contribute to the reinstatement of the avenue of lime trees on Market Street.</p>
MM78	87	BDP17.16 TC9	<p>BDP17.16 TC9 Mill Lane</p> <p>This site offers a longer term opportunity for retail led mixed use development <i>to be informed by the future Strategic Flood Risk Assessment. It is envisaged</i></p>

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			<p><i>that the following development principles will apply subject to the outcome of a flood risk assessment:</i></p> <p>A. At ground floor level A1 retail uses are to be the predominant use. with Upper floors suitable for office and residential uses development. may be considered subject to the provision of safe flood free pedestrian access and egress</p> <p>B. The scale of retail development is to be determined although the scope to include larger retail spaces must be considered.</p> <p>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'.</p> <p>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.</p> <p><i>E. Development must be made safe without increasing flood risk elsewhere. Opportunities should also be sought through the design and layout for reducing flood risk in the area.</i></p> <p>E F. The current pedestrian thoroughfare along Mill Lane will be protected in any development proposals.</p>
MM79	87	BDP17.17 & BDP17.18 TC10	<p><i>This site offers a longer term opportunity for employment based redevelopment to be informed by a future Strategic Flood Risk Assessment. It is envisaged subject to the outcome a flood risk assessment that P</i></p> <p>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.</p> <p>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 <i>whilst taking the risk of flooding as identified by the strategic flood risk assessment into account</i> and where possible look to use these features as a positive design element. <i>Any development proposals must be made safe without increasing flood risk elsewhere. Opportunities should also be sought through the design and layout for reducing the flood risk in the area.</i></p>
MM80	89	BDP18.1	<p>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 <i>or any other appropriate Town Centre use</i> at upper floor level.</p>
MM81	92	BDP19 8.258	<p><i>One of the purposes of the planning system is to contribute to the achievement of sustainable development. Using sustainable design and construction techniques ensures that the environmental impacts of buildings</i></p>

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			<p>are minimised as far as possible. Buildings of all types and sizes have the potential to reduce their impact on the environment, including by minimising their contribution to climate change and by using less resources. This also includes the use of sustainable building materials having regard to sourcing materials in a responsible way and use of materials which have a low embodied impact over their life including extraction, processing, manufacture and recycling. 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 is a 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 non-domestic development to meet the BREEAM 'very good' standard.</p>
MM82	92	8.261	<p>Design and criminal behaviour</p> <p>8.261 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 supports the implementation of design principles consistent with the recommendations of expects all development to meet the 'Secured by Design' standard, unless this # 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.</p>
MM83	94	BDP19.1	<p>c) Ensuring residential development achieves the highest standard of Building for Life;</p> <p>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, or the equivalent level(s) as set out in the transitional arrangement of the national housing standards or other successor schemes; Encouraging the use of sustainable construction methods and materials;</p> <p>e. Ensuring all non-residential developments to meets BREEAM 'very good' standard or other successor guidance</p> <p>l). Encouraging 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.</p>

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			<p>through meeting the internal environment standards in Standards and Quality in Development: A good practice guide;</p> <p>e). Ensuring developments meet the 'Secured by Design' standard <i>Designing out crime and the fear of crime by incorporating measures and principles consistent with those recommended by 'Secured by Design'</i>;</p>
MM84	94	BDP19.1	<p>r. Ensuring development is made suitable for the proposed final use, for instance, in terms of land contamination, <i>and does not create an unacceptable risk to controlled waters (where relevant)</i>. The Council will determine whether reports detailing for example, the site history; a <i>preliminary risk assessment, an appropriate remediation scheme and where appropriate; a site investigation and remediation scheme along with</i> 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.</p>
MM85	99	BDP20.12	<p>The District Council will update the current draft local list of assets <i>heritage list</i> and formally adopt it. It will 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 Worcester and Worcester <i>Birmingham</i> canal which runs the length of the District, to name but a few.</p>
MM86	99	BDP20.13	<p>BDP20.13 The District Council will support development that:</p> <ul style="list-style-type: none"> i. Retains locally listed buildings. <i>Heritage Assets on the Local List</i> ii. Involves sympathetic alterations and extensions to locally listed buildings <i>Heritage Assets on the Local List</i> iii. Does not have a detrimental impact on the setting or context of locally listed buildings. <i>Heritage Assets on the Local List.</i>
MM87	99	BDP20.14	<p>In considering applications that directly or indirectly affect locally listed buildings <i>Heritage Assets</i>, 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. <i>Heritage Asset.</i></p>
MM88	103	BDP21.1	<p>BDP 21.1 The Council will seek to achieve better management of Bromsgrove's natural environment by expecting developments to:</p> <ul style="list-style-type: none"> a) i) Protect and, 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 principleal importance). wildlife corridors, stepping stones and buffer zones. ii) <i>Protect and create corridors and 'stepping stones'</i> iii) <i>Enhance restoration areas</i> iv) <i>Protect and create buffer zones- areas that protect core areas, restoration areas and 'stepping stones'</i> v) <i>Ensure areas of land surrounding development are managed in a sustainable and wildlife friendly manner</i> <p>b) Take appropriate steps to maintain the favourable conservation status of</p>

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			<p>populations of protected species.</p> <p>c) Protect, restore and enhance other features of natural environmental importance, <i>including locally protected sites</i>, in line with local environmental priorities.</p> <p><i>BDP21.2 In determining applications affecting sites of wildlife importance, the Council will apply the principles and hierarchy of designated sites set out in the NPPF and appropriate weight will be given to their importance and contribution to wider ecological networks. Due to the national importance of Sites of Special Scientific Interest (SSSI) proposals likely to have an adverse impact within or outside of a SSSI, either individually or in combination with other developments, will not normally be permitted. An exception will only be made when it can be demonstrated that the benefits of the development clearly outweigh the impact on the site or network of sites.</i></p>
MM89	105	8.290	<p>Energy Efficiency in new buildings</p> <p>8.290 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 2019⁴³. The Government's approach to achieve zero carbon home is through revising Part L of the Building Regulations and a new mechanism called 'allowable solutions⁴⁴'. 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. To maximise benefits of carbon reduction in the District, the Council supports the use of sustainable building techniques and local and low-carbon materials. It is expected that the use of local materials will bring local benefits to the District and surrounding area.</p>
MM90	105		<p>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.</p>
MM91	105	Footnote 43	<p>43. 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"</p>
MM92	105	Footnote 44	<p>44. 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'</p>
MM93	106	Paragraph 8.295	<p>8.295 To contribute to the carbon reduction target, the Council will support large scale low/ zero carbon energy generation projects when adverse impacts are addressed satisfactorily. For developments in</p>

Appendix

Ref	Page	Policy/ para	Main Modification
			<p>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 <i>district heating supply</i>, 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. <i>Wind energy generation schemes, such as wind harvesting/ turbines will be considered against national policy and guidance.</i></p>
MM94	107	BDP 22 Climate Change	<p>The Council will deliver viable low carbon climate resilient developments through:</p> <p>a. Encouraging development in existing buildings to achieve consequential energy efficiency improvements</p> <p>b. Requiring allowable solutions to be linked with projects within the District in the first instance, followed by the County and then Region</p> <p>b e. 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,</p> <p>c d. Ensuring developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure.</p> <p>d 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.</p> <p>e 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 a <i>district heating zero or low carbon energy generation</i> scheme, developments nearby are expected to provide infrastructure/ to connect to the zero/ low carbon energy <i>that</i> scheme.</p> <p>f g. Supporting zero or low carbon energy generation schemes, other than wind energy, when adverse impacts are addressed satisfactorily.</p>
MM95	108	8.306	<p>In terms of residential development, the Environment Agency Report 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 454 of the Code for Sustainable Homes by 2013 and Level 655 by 2016 and that affordable housing can achieve Code Level 6 from 2013 onwards.</p>
MM96	109	BDP23 8.309	<p>To ensure flood risk is minimised, the Council expects all developments to take account of flood risk from all sources (which should also include the impact of climate change) and follow the flood risk management hierarchy in <i>the National Planning Practice Guidance PPS25 Development and Flood</i></p>

Appendix

Ref	Page	Policy/ para	Main Modification
			<p>Risk Practice Guide, that is: 1) Assess; 2) Avoid; 3) Substitute; 4) Control; 5) Mitigate, when planning and designing development.</p> <p><i>Site-specific Flood Risk Assessments (FRAs) and drainage proposals should have regard to the guidance within the Council's Level 2 Strategic Flood Risk Assessment (SFRA) and take account of the effect of climate change on peak river flows and peak rainfall intensity as set out in Table 1 and Table 2 (respectively) of the Government's Climate Change Allowance guidance. This is available at: https://www.gov.uk/guidance/flood-risk-assessments-climate-changeallowances</i></p>
MM97	111	BDP 23.1	<p>The Council will deliver safe developments with low environmental impact through:</p> <ul style="list-style-type: none"> 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. <i>Any major residential development (as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010) schemes within the Bow Brook or Batchley Brook catchments should meet a water efficiency target of 110 litres per person per day</i> c) Ensuring development addresses flood risk from all sources, follows the flood risk management hierarchy when planning and designing development, and does 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.

Appendix

Ref	Page	Policy/ para	Main Modification
MM98	135	Appendix II Glossary	Green Belt - Land allocated for a district to prevent urban sprawl by keeping land permanently open. Guidance on Green Belt policy is contained in <i>the NPPF PPG2</i> , and the <i>Policies Map Worcestershire Structure Plan</i> identifies the broad extent of <i>the</i> Green Belt within Bromsgrove District. and the Local Plan defines detailed boundaries of Green Belt land.
MM99	135	Appendix II Glossary	Add new text: <i>Infrastructure Delivery Plan (IDP) - The IDP is a key component of the evidence base to support the Bromsgrove District Plan. The IDP provides a baseline of the existing infrastructure capacity and needs in the District and highlights the infrastructure requirements to support the predicted growth set out in the Bromsgrove District Plan. The IDP provides a snapshot at the time of publication of the Proposed Submission Bromsgrove District Plan. Over the plan period, new funding opportunities will arise and, equally, infrastructure priorities may change. The IDP will be reviewed on an annual basis subsequent to the Local Plan's adoption to reflect these changes.</i>
MM100	138	Appendix IV	Before table in Appendix 4 insert the following text: <i>The following table sets out where policies in the Bromsgrove District Local Plan (BDLP) 2004 will be superseded by the Bromsgrove District Plan on adoption. Where terms such as 'partially replaced' and 'partially superseded' are used it simply means parts of BDLP policies were not considered necessary to carry forward as they are either no longer relevant or the level of detail will be addressed in a future Supplementary Planning Document. For clarification, no part of the BDLP will remain extant following the adoption of the Bromsgrove District Plan.</i>
MM101	152	Appendix VI	New Supplementary Planning Documents: Design SPD To replace SPG1 Residential Design Guide (<i>to include evening and night-time economy</i>), SPG2 Shopfronts and Advertisements, SPG4 Conversion of rural Buildings and SPG5 Agricultural Buildings Design Guide.

December 2016 UPDATE

Schedule of Modifications to Bromsgrove District Plan

The schedule below is intended to record and highlight minor editorial corrections, amendments, factual updates and clarifications to the Bromsgrove District Plan. These alterations are not considered to represent changes that would need to be consulted upon as they do not have any material effect on the meaning or direction of the plan and its policies. They represent instead an opportunity to make minor alterations to the plan to improve its readability, clarity and accuracy.

New wording in italics- *italics*

Deleted wording is struckthrough- ~~struckthrough~~

Minor typos not included below

Page Number	Policy/Paragraph/table	Proposed wording/correction	Reason for change
1	Contents	1. Introduction and Context Background Content What has influenced this Plan? Duty to Cooperate The Local Enterprise Partnership What happens next? 5 Can I still get involved? 5	Update for intended adoption version
184	Contents	9. Implementation and monitoring	Correction
27	Introduction and Context 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. <i>As there are a substantial number of Parishes in the District (19) it is anticipated that Parish Councils will continue to play a prominent role in this process. There will also be support for Neighbourhood Planning initiatives proposed in non-parished areas.</i>	Highlight importance of neighbourhood planning
3	Introduction and Context 1.9	Evidence from a number of studies about the District, including but not exclusively: <ul style="list-style-type: none"> • Employment Land Review 2008/2012 	Correction

		<ul style="list-style-type: none"> • 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 Outline (2012) • Settlement Hierarchy Study 2012 • Green Infrastructure Baseline Report 2012 • Retail Study 2013 • Viability Assessment 20143? • Annual Monitoring Reports ongoing 	
4 Page 185	Introduction and Context 1.11	Involvement of key stakeholders and local communities, including consultation on: <ul style="list-style-type: none"> • 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 <i>Proposed publication Submission</i> Version (current) 	Correction
4	Introduction and Context 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.	Update for intended adoption version
5	Introduction and Context 1.21 -1.27	What happens next? 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.	Update for intended adoption version

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.

Once submitted, the BDP will be subject to independent examination to ensure the Plan is sound and for compliance with Duty to Co-operate, 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~~

~~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.~~

The submitted document will then be considered at an

- ~~• Examination in Public to be conducted by an independent~~

		<ul style="list-style-type: none"> • Inspector who will determine whether the plan is sound. <p>Can I still be involved? 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.</p> <p>Publication of the District Plan is timetabled for 30 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 11th November 2013.</p> <p>Please send the completed form to: The Strategic Planning Team, Planning and Regeneration, The Council House, Burcot Lane, Bromsgrove, Worcestershire, B60 1AA</p> <p>Or alternatively email a copy of the completed response form to strategicplanning@bromsgrove.gov.uk</p> <p>To find out more about the Bromsgrove District Plan (2011-2030) Publication Version you can visit the Council's web page at www.bromsgrove.gov.uk/bdp Alternatively you may wish to speak to an officer on 01527 881316.</p>	
10	2.31	...a high quality multi-modal interchange at Bromsgrove is currently planned (<i>now</i>	Update

		<i>built 2016)...</i>	
11	Key Challenges 3.1	3) Meeting the growth needs of the District up to 2030 and beyond by ensuring that there is an adequate a supply of appropriate housing and employment land thus providing certainty for the development industry.	Clarification
11	Key Challenges 3.1	12) Celebrating and conserving the District's individuality as an attractive and safe place with a unique historic built environment and landscape which is <i>geologically and</i> biodiversity rich.	Clarification
13	Vision 4.12	These include the Lickey, Clent and Waseley Hills, canals, ancient woodlands, areas of nature conservation, biodiversity, <i>geodiversity</i> and landscape character, together with Conservation Areas, listed buildings and their settings, all of which will have been carefully protected, conserved and enhanced.	Clarification
15	6.2	The context for each policy is first provided, then a brief feedback on consultation and the Sustainability Appraisal is given and then finally the actual policy is highlighted in bold typeface.	Updated document
18 Page 188	Key Diagram 7	Key Diagram and Policies Map The Key Diagram (at the bottom of this page) diagrammatically illustrates, the spatial strategy set out within the document. <i>Where possible, the policies of this Plan appear in greater detail on the Policies Map. The Policies Map should be read in conjunction with the Bromsgrove District Plan.</i>	To provide greater clarity
16	BDP1 8.5 - 8.8	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	Text not required in final version of the Plan

Page 189		<p>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.</p> <p>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.</p> <p>Sustainability Appraisal</p> <p>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.</p>	
	BDP1	BDP1 Policy Sustainable Development Principles	Correction
	BDP 2	Small 'Settlement' (population circa 50-2500) Adams Hill Belbroughton Beoley Blackwell Bournheath Burcot Clent Cofton Hackett	Reordered in alphabetical order and insertion of Rowney Green and Lower Clent to align with previous policy

		Dodford Fairfield Finstall Holy Cross Hopwood Lower Clent Romsley Rowney Green Stoke Prior	wording
18	BDP2 8.14-8.17	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 Hunnington. 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.	Text not required in final version of the Plan

Page 191		<p>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.</p> <p>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.</p> <p>Sustainability Appraisal</p> <p>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.</p>	
22	BDP3 8.26 & 8.27	<p>Consultation Feedback</p> <p>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).</p>	Text not required in final version of the Plan

		<p>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.</p>				
22	BDP3	BDP3 Policy Future Housing and Employment Growth				Correction
22	BDP3 (table)	BDP43 Development Targets				Correction
		BDP 3 Development Targets				
		BROMSGROVE		REDDITCH <i>within Bromsgrove District</i>		
		Type of development	Target	Timescale	Type of development	Target
						Timescale
		Dwellings outside Green Belt	4,700	2011-2030	Dwelling units	3400
					<i>Employment land</i>	<i>2011-2030</i>
					<i>10 ha</i>	
					<i>in hectares (ha)</i>	
		Green Belt Review	2,300	2023-2030		
		Employment	28ha	2011-2030		

		land in hectares (ha)				
23	8.29		... the total amount of land required will be approximately 330 320 ha, including: 128 118 ha to deliver 2,300 dwellings until 2030...			
24	BDP4 8.37-8.39		<p>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.</p> <p>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.</p> <p>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.</p>			Text not required in final version of the Plan
25	BDP4 and BDP4.1		<p>BDP4 Policy Green Belt</p> <p>The general extent of the Green Belt as indicated on the Policies Map will only be maintained as per BDP 4.2</p>			Correction and Clarification
28	BDP5A 8.55-8.59		<p>Consultation Feedback 8.55 A wide range of consultation responses were received in relation to the policy</p>			Text not required in

Page 194	<p>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.</p> <p>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.</p> <p>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.</p> <p>8.58 The Council have continued to gather evidence in relation to the sites and</p>	final version of the Plan
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		<p>engaged with relevant stakeholders which have resulted in minor changes to the capacities of each of the sites.</p> <p>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.</p>	
27	BDP5A	BDP5A Policy Bromsgrove Town Expansion Sites Policy	Correction
Page 195	BDP5B 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 received for the Birmingham Road/ Rectory Lane site (13/0026). Land adjoining Crown Meadow, Birmingham Road, Alvechurch has full permission for 27 dwellings (11/0672) <i>and the development has now been completed.</i>	Factual update
32	BDP5B 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 at Barnt Green was a suitable location for some ADR provision. Following a	Factual update

		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 (11/0741) and reserved matters (13/0522) planning permission for 88 dwellings and construction is underway(11/0741).	
32	BDP5B 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) and is now complete.	Factual update
33 Page 196	BDP5B 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 6. This site comprises almost 8 hectares of land and has planning permission for 181 dwellings following a reserved matters application (12/0708) and is now under construction.	Factual update
33	BDP5B 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 7. 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 all 76 homes are now under construction.have now been completed.	Factual update
33	BDP5B 8.70-8.77	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	Text not required in final version of the Plan

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

		<p>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.</p> <p>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.</p>	
34	BDP5B	BDP5B Policy Other Development Sites Policy	Correction
43 Page 198	RCBD1.2	<p>Two sustainable mixed use urban extensions (Foxlydiate <i>Foxlydiate</i> 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 44, 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.</p>	Correction
43	RCBD1.5.1-RCBD1.5.2	<p>Consultation Feedback RCBD1.5.1 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</p>	Text not required in final version of the Plan

Page 199		<p>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.</p> <p>Sustainability Appraisal</p> <p>RCBD1.5.2 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.</p>	
Page 199	<p>RCBD1.1</p> <p>BDP6 8.81- 8.85</p>	<p>RCBD1.1 Policy Redditch Cross Boundary Development</p> <p>Consultation Feedback</p> <p>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.</p> <p>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.</p>	<p>Correction</p> <p>Text not required in final version of the Plan</p>

Page 200		<p>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.</p> <p>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.</p> <p>Sustainability Appraisal</p> <p>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.</p>	
49	BDP7 8.95-8.97	<p>Consultation Feedback</p> <p>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 micromanage supply in such a</p>	Text not required in final version of the Plan

Page 201		<p>way could compound affordability problems.</p> <p>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.</p> <p>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 approximately 90% 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.</p> <p>Sustainability Appraisal</p> <p>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.</p>	
49	BDP7	BDP7 Policy Housing Mix and Density	Correction
51	BDP8 8.107-8.111	<p>Consultation Feedback</p> <p>8.107 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.</p> <p>8.108 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</p>	Text not required in final version of the Plan

Page 202		<p>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.</p> <p>8.109 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.</p> <p>8.110 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.</p> <p>Sustainability Appraisal</p> <p>8.111 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.</p>	
52	BDP8	BDP8 Policy Affordable Housing	Correction
53-54	BDP9 8.117-8.118	<p>Consultation Feedback</p> <p>8.117 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.</p> <p>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</p>	Text not required in final version of the Plan

		<p>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.</p> <p>Sustainability Appraisal 8.118 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 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.</p>	
Page 203	BDP9 8.127-8.128	<p>BDP9 Policy Rural Exception Sites</p> <p>Consultation Feedback 8.127 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.</p> <p>Sustainability Appraisal 8.128 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,</p>	Correction Text not required in final version of the Plan

		although mitigation may be required when considering development outside defined settlements.	
56	BDP10	BDP10 Policy Homes for the Elderly	Correction
57	BDP11 8.132-8.133	Consultation Feedback 8.132 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 8.133 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.	Text not required in final version of the Plan
	BDP11	BDP11 Policy Accommodation for Gypsies, Travellers and Travelling Showpeople	Correction
	BDP12 8.138-8.139	Consultation Feedback 8.138 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 8.139 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	Text not required in final version of the Plan

		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.	
59	BDP12	BDP12 Policy Sustainable Communities	Correction
62	BDP13 8.149-8.153	<p>Consultation Feedback</p> <p>8.149 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.</p> <p>8.150 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.</p> <p>8.151 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.</p> <p>8.152 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.</p> <p>Sustainability Appraisal</p> <p>8.153 The policy performs well in the Sustainability Appraisal against the social and</p>	Text not required in final version of the Plan

		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.	
62	BDP13	BDP13 Policy New Employment Development	Correction
63	BDP14 8.158-8.159	<p>Consultation Feedback 8.158 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.</p> <p>Sustainability Appraisal 8.159 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.</p>	Text not required in final version of the Plan
64	BDP14	BDP14 Policy Designated Employment	Correction
66	BDP15 8.165-8.168	<p>Consultation Feedback 8.165 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,</p>	Text not required in final version of the Plan

		<p>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.</p> <p>8.166 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.</p> <p>Sustainability Appraisal</p> <p>8.167 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.</p> <p>8.168 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.</p>	
67	BDP15	BDP15 Policy Rural Renaissance	Correction
70	8.182	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	Update for consistency

		existing station (<i>now completed</i>). 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.	
70	BDP16 8.183	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. <i>This will improve connectivity with the West Midlands Metropolitan area in accordance with the West Midlands Local Transport Plan or successor document.</i>	Highlight link to wider strategies ie the West Midlands Local Transport Plan or successor document
70 Page 208	BDP16 8.184	8.184 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; <i>and the National Cycle Network (NCN). And Although technically not Public Rights of Way, canal towpaths also provide an important means of access to the countryside. where publically accessible.</i>	Clarification
71	BDP16 8.187	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.	Sentence not appropriate under the heading of freight.
71	BDP16 8.190	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.	correction

72	BDP16 8.195-8.197	<p>Consultation Feedback</p> <p>8.195 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.</p> <p>8.196 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).”</p> <p>Sustainability Appraisal</p> <p>8.197 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.</p>	Text not required in final version of the Plan
73	BDP 16	BDP16 Policy Sustainable Transport	Correction
73	BDP 16	BDP16 Sustainable Transport BDP16.1 Development should comply with the Worcestershire <i>County Council's</i>	Clarification and update

		Transport Local Transport Plan 3 policies, design guide and car parking standards , incorporate safe and convenient access and be well related to the wider transport network	
73	Footnote	Worcestershire County Council Parking Standards 2016 or successor guidance	Update
78	BDP17 8.229	8.229 Planning permission (13/0464) has been granted Current proposals to refurbish and extend the former Parkside Middle School premises to create office accommodation for staff of Worcestershire County Council and a Civic Centre for Bromsgrove District Centre Council and associated staff. The scheme also incorporates the relocation of Bromsgrove Hub, Bromsgrove Library and the job centre. This scheme is now complete.	Updated information available
80	BDP17 8.239-8.246	<p>Consultation Feedback</p> <p>8.239 There was widespread support for the regeneration of the Town Centre with very few changes actually sought to the policy.</p> <p>8.240 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.</p> <p>8.241 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.</p> <p>8.242 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</p>	Text not required in final version of the Plan

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.

8.243 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.

8.244 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 Council's 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.

8.245 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

		<p>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.</p> <p>Sustainability Appraisal 8.246 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.</p>	
81	BDP17	BDP17 Policy Town Centre Regeneration	Correction
88	8.248	...(as indicated <i>in blue</i> on the Policies Map).	Clarification
89	BDP18 8.249-8.251	<p>Consultation Feedback 8.249 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.</p> <p>Sustainability Appraisal 8.250 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.</p> <p>8.251 Creating active frontages and complimenting uses above retail units can reduce crime and anti-social behaviour by providing natural surveillance there is also</p>	Text not required in final version of the Plan

		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.	
89	BDP18	BDP18 Policy Local Centres	Correction
89	BDP 18	BDP18 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, residential use or any other appropriate Town Centre use at upper floor level. These areas are defined as Local Centres for shopping purposes in accordance with the provisions of 'large settlements' identified in Policy BDP2.	Clarification due to Main Modification in BDP2
90	BDP 19 8.257	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 12 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 12.	Building for life deleted by Inspector in Main Modifications
93	BDP19 8.266-8.269	Consultation feedback 8.266 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. 8.267 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. 8.268 Some raised concerns that references to the Building for Life and West	Text not required in final version of the Plan

		<p>Midlands Sustainability Checklist in the policy would elevate the status of the two tools which would create an extra burden for developers. Also, funding for the West Midlands Sustainability Checklist has stopped and some suggested developing a local checklist. Comments in relation to the Sustainability Checklist are noted and this has now been removed, however as Building for Life is only an assessment tool guiding developments to achieve good design, it is not considered that policy reference is conflicting with the national policy which also seeks high quality design. There is also no evidence to suggest that high quality design is more costly.</p> <p>Sustainability Appraisal 8.269 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.</p>	
4 Page 214	BDP19	BDP19 Policy High Quality Design	Correction
	BDP 19 s.	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 should must not increase nitrogen dioxide (NO2), particulate matter (PM10) and carbon dioxide (CO2) 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:	
97	BDP20 8.272	Within the District examples would include, nailers cottages, assets associated with the scythe industry and assets associated with the use of the Birmingham Worcester <i>Birmingham</i> and Worcester Birmingham canal which runs the length of the District, to name but a few.	Correction
97	BDP20 8.273-8.274	<p>Consultation Feedback 8.273 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.</p> <p>The reference to contemporary design has now been removed with the focus now on achieving development that is sympathetic to historic assets. Some respondents</p>	Text not required in final version of the Plan

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

8.274 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.	
98	BDP20	BDP20 Policy Managing the Historic Environment	Correction
99	BDP20.17	Applications likely to affect the significance of known or potential h <i>Heritage Assets</i> 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.	Correction
102	BDP21 8.282	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. <i>Following the principles established at The European Landscape Convention, which became binding to the UK from March 2007, the Worcestershire Landscape Character Assessment was produced. 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.</i>	Add reference to European Landscape Convention
103	BDP21 8.283-8.284	Consultation Feedback 8.283 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	Text not required in final version of the Plan

		<p>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.</p> <p>Sustainability Appraisal 8.284 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.</p>	
103	BDP21	BDP21 Policy Natural Environment	Correction
104	8.289	<p>Reducing Energy Use Existing buildings 8.289 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 below³⁹. From 2013, the Green Deal⁴⁰ and Energy Company Obligation⁴¹ will be in place to help householders and the non-residential sector⁴² 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.</p>	Green Deal no longer exists
104	Footnote 36	Worcestershire County Council (2013) 2014 “Draft Worcestershire Climate Change Strategy 2012-2020”. Projections are is based on medium emissions scenario for 2020s using 90% probability level.	Update
104	8.289	<p>Reducing Energy Use Existing buildings 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 below³⁹. From 2013, the Green Deal⁴⁰ and Energy Company Obligation⁴¹ will be in place to help householders and the non-residential sector⁴² 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.</p>	Green Deal no longer exists

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104	Footnote 40	40. 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.	Green Deal no longer exists
106	Renewable Energy, paragraph 8.294	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 microgeneration 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. <i>For residential development this policy applies to planning applications of more than 10 units.</i>	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial statement (18th June 2015)
106	BDP22 8.296	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: <i>Making the country resilient to a changing climate</i> (under-way July 2013). 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.	
107	BDP22 8.300-8.302	Consultation Feedback 8.300 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	Text not required in final version of the Plan

Page 219		<p>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.</p> <p>8.301 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.</p> <p>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.</p> <p>Sustainability Appraisal</p> <p>8.302 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.</p>	
107	BDP22	BDP22 Policy Climate Change	Correction
107	BDP 22 Climate Change	<p>The Council will deliver viable low carbon climate resilient developments through:</p> <ul style="list-style-type: none"> 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 b e. 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, 	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written

		<p>c d. Ensuring developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure.</p> <p>d 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.</p> <p>e 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 a <i>district heating zero or low carbon energy generation</i> scheme, developments nearby are expected to provide infrastructure/ to connect to the zero/ low carbon energy <i>that</i> scheme.</p> <p>f g. Supporting zero or low carbon energy generation schemes when adverse impacts are addressed satisfactorily.</p>	Ministerial Statement (25th March 2015)
10 Page 220	BDP23 8.317-8.321	<p>Consultation Feedback</p> <p>8.317 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.</p> <p>8.318 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.</p>	Text not required in final version of the Plan

		<p>8.319 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.</p> <p>8.320 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.</p> <p>Sustainability Appraisal</p> <p>8.321 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.</p>	
Page 221	BDP23	<p>BDP23 Policy Water Management</p> <p>BDPC23.1 The Council will deliver safe developments with low environmental impact through:</p>	Correction
Page 222	BDP 24 8.323	<p>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, BDP47 21 Natural Environment, BDP 49 22 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.</p>	Correction of policy references
112	BDP24 8.324	<p>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,</p>	Update following the finalisation

		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.	of the Worcestershire Green Infrastructure Strategy
112	BDP24 8.325	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.	Update following the finalisation of the Worcestershire Green Infrastructure Strategy
113 Page 222	BDP24 8.326-8.328	<p>Consultation Feedback</p> <p>8.326 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.</p> <p>8.327 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.</p> <p>Sustainability Appraisal</p> <p>8.328 The Policy was assessed within the Sustainability Appraisal and performs strongly against many of the environmental and social objectives and in some cases,</p>	Text not required in final version of the Plan

		brings in economic benefits (e.g. eco-tourism). But safeguarding all Green Infrastructure assets maybe costly and even unviable in some cases.	
113	BDP24	BDP24 Policy Green Infrastructure	Correction
115	BDP25 8.339-8.343	<p>Consultation Feedback</p> <p>8.339 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 overconcentration 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.</p> <p>A considerable amount of support was given to the references regarding walking and cycling.</p> <p>8.340 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.</p> <p>Sustainability Appraisal</p> <p>8.341 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.</p> <p>8.342 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</p>	Text not required in final version of the Plan

		<p>precipitation to infiltrate the soil and reduce run-off.</p> <p>8.343 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.</p>	
116	BDP25	BDP25 Policy Health and Well Being	Correction
117	BDP 25 .6 a)	a) The proposed use will not result in the proportion of units within the designated centre or <i>retail</i> frontage <i>outside of a Local centre</i> being hot food takeaways exceeding 5% (updated figures for each local centre will be published annually within the Council's AMR)	Clarification
Page 9 Page 224	Appendix I (BDP3)	<p>Evidence Base</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>Housing Land Availability Availability Report, Bromsgrove District Council</p> <p>Five Year Land Supply, Bromsgrove District Council</p>	Correction

		Duty to Co-operate <i>Review Statement of Compliance</i> , Bromsgrove District Council	
120	Appendix I (BDP4)	<p>Worcestershire Strategic Housing Market Assessment 2012, GVA</p> <p>Employment Land Review 2012, Drivers Jonas Deloitte</p> <p>Housing Growth Development Study, Redditch Borough Council and Bromsgrove District Council</p> <p>Sustainability Appraisal of Housing Growth Development Study, Redditch Borough Council and Bromsgrove District Council</p> <p><i>Duty to Co-operate Statement of Compliance, Bromsgrove District Council</i></p>	Correction
123	Appendix I (RCBD1)	<p>Housing Growth Development Study, Redditch Borough Council and Bromsgrove District Council</p> <p>Sustainability Appraisal of Housing Growth Development Study, Redditch Borough Council and Bromsgrove District Council</p> <p>Worcestershire Strategic Housing Market Assessment 2012, GVA</p> <p>Strategic Housing Land Availability Assessment, Redditch Borough Council</p>	Correction

		<p>Affordable Housing Viability Study, Level</p> <p>Hewell Grange Estate-Setting of Heritage Assets Assessment 2013 (BDC)</p> <p>Duty to Co-operate <i>Statement of Compliance Review</i> (BDC)</p> <p>An Analysis of Green Belt Land and Areas of Development Restraint within Redditch Borough (RBC)</p> <p>Redditch Green Belt Release to meet Growth needs (RBC)</p>	
134	Appendix II	<p>Authority 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 <i>Local plan and adopted SPDs</i> are being achieved.</p>	Correction
Page 226	Appendix II	<p><i>Building Research Establishments Environmental Assessment Method (BREEAM) is the world's most widely used environmental assessment method for buildings. BREEAM assesses buildings against a set criteria and provides an overall score which will fall within a band providing either a; PASS, GOOD, VERY GOOD, EXCELLENT or OUTSTANDING rating.</i></p>	Additions to glossary
134	Appendix II	<p>Close Care Housing - Close Care schemes consist of independent flats or bungalows built on the same site as a care home. Residents often have some services (such as cleaning) included in their service charge and other services can be purchased from the care home. Close care schemes can either be rented or purchased. Purchasers may receive a guarantee that the management will buy back the property if they enter the care home.</p> <p>Community Infrastructure Levy (CIL) - <i>The Community Infrastructure Levy (the levy) came into force in April 2010. The Community Infrastructure Levy is a new charge which local authorities in England and Wales can levy on new development in their area. CIL is the Government's preferred method for development to pay</i></p>	Additions to glossary

<p style="text-align: center;">Page 227</p>		<p><i>towards the infrastructure and is charged on the net additional floorspace created by development of buildings that people normally use. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes transport schemes, flood defences, schools, hospitals and other health and social care facilities, parks, green spaces and leisure centres.</i></p> <p>Conservation Area - <i>Conservation Areas are designated by the District Council as areas of special architectural or historic interest, the character and appearance of which the Council considers desirable to preserve or enhance.</i></p> <p>Continuing care retirement communities - A continuing care community, also known as a life-care community, is a type of retirement community where a number of aging care needs, from assisted living, independent living and nursing home care, may all be met in a single residence, whether apartment or enclosed unit. Typically, elderly candidates move into a continuing-care retirement community (CCRC) while still living independently, with few health risks or healthcare needs, and will remain reside there until end of life. As patrons progress in age, and medical needs change, the level of nursing care and service increases proportionally in response. Continuing-care communities are ideal for seniors that may be living in isolation, and would like to be immersed in a hospitable environment with other people of the same age. Typically, a range of activities and amenities are provided for both recreation and resource. However, CCRCs are costly, and vary widely in entrance and recurring fees. Often, a life-care contract is required, and the stipulations within such contracts can also vary in terms of service.</p>	
<p>135</p>	<p>Appendix II Glossary</p>	<p>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).</p> <p>National Planning Policy Framework (NPPF) - <i>The NPPF was published in March</i></p>	<p>Clarification and additions to glossary</p>

		<p><i>2012, replacing past Planning Policy Statements/Guidance (PPSs/PPGs), and sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.</i></p> <p>Planning Obligations - <i>Legal agreements between a planning authority and a developer that ensure that certain extra works related to a development are undertaken. For example, the provision of highway works. More commonly known as 'Section 106 agreements'.</i></p> <p>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. <i>These were replaced by the NPPF in March 2012.</i></p> <p>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.</p> <p>Priority Habitats and Species - <i>Priorities compiled by regional bio-diversity partnerships, reflecting those in the national bio-diversity action plan and those agreed by local biodiversity partnerships at the sub-regional level.</i></p>	
135	Appendix II	<p>Small Scale Renewable Energy (Microgeneration) - Small-scale renewable energy schemes include the installation of solar panels and wind turbines at domestic and nondomestic premises, as well as other renewable and low carbon energy installations at these premises such as ground or air source heat pumps,</p>	Addition to glossary

		<p>biomass systems and combined heat and power (CHP) systems.</p> <p>Special Wildlife Site (SWS) – Defined areas of ecological or geological importance identified to protect habitat and species diversity.</p> <p>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.</p>	
135-136	Appendix II	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Windfalls or Windfall Sites – Sites that come forward for development that have not been specifically identified as available for development within the Local Plan.</p>	Alterations to glossary

Delete Appendix IV Superseded BDLP Policies and Proposals as now replaced by new Plan					
Appendix IV Monitoring indicators					
Page 230	B098	146	BDP1 Sustainable Development Principles	<ul style="list-style-type: none"> • Number of trips made by public transport • Decrease in CO2 emissions • No of parks and areas of recreation space • No of listed buildings at risk • <i>New dwellings on previously developed land</i> • <i>Total amount of employment land on previously developed land</i> • Number of bus and rail travellers • % of peoples usual method of travel • Number of new AQMA's declared • Total n Number of listed buildings (<i>all grades</i>) • Number of listed buildings demolished • <i>Number of listed buildings and archaeological sites on English Heritage's register of buildings/sites at risk</i> • % of unemployment • <i>Emissions within the scope of influence of Local Authority</i> 	Corrections to ensure that all indicators are relevant and can be monitored with ease.
	B099	146	BDP2 Settlement Hierarchy	<ul style="list-style-type: none"> • <i>New dwellings on previously developed land</i> • % of development <i>Total amount of employment land on previously developed land</i> • % of development in each settlement type 	Correction
	B100	146	BDP3 Future Development	<ul style="list-style-type: none"> • Net additional dwellings <i>completed</i> • Number of hectares of employment completed • Number of years of housing supply • <i>Managed delivery target (Housing trajectory)</i> • <i>Employment land available</i> • <i>Plan period and housing targets</i> • <i>Plan period and employment targets</i> • <i>Net additional pitches (Gypsy and Traveller)</i> 	Correction

B101	146	BDP5A Bromsgrove Town Expansion Sites	<ul style="list-style-type: none"> • Number of dwellings (<i>including affordable</i>) completed on expansion sites • No. of affordable dwellings on expansion sites • No. of hectares of employment completed on expansion sites • <i>Total amount of additional employment land – by type on expansion sites, development sites and cross boundary sites</i> • Amount of retail floorspace completed on expansion sites and cross boundary sites • Amount of open space on expansion/development sites 	Correction
B102	147	BDP5B Other Development Sites	<ul style="list-style-type: none"> • Number of dwellings (<i>including affordable</i>) completed on development sites • No. of hectares of employment completed on development sites • <i>Total amount of additional employment land – by type on expansion sites, development sites and cross boundary sites</i> • Amount of open space on expansion/development sites 	Correction
B103	147	RCBD1 Redditch Cross Boundary Development	<ul style="list-style-type: none"> • Number of dwellings (<i>including affordable</i>) completed on cross boundary sites • No. of affordable dwellings on cross boundary sites • Amount of retail floorspace completed on <i>expansion sites and cross boundary sites</i> • Amount of open space on cross boundary sites 	Correction
B104	147	BDP7 Housing Mix and Density	<ul style="list-style-type: none"> • Average density of development achieved across the District • Number of dwellings built at less than 30 dwellings per hectare • Number of dwellings built between 30 and 50 dwellings per hectare • Number of dwellings built at greater than 50 dwellings per 	Correction

			<ul style="list-style-type: none"> hectare No. and % percentage of dwellings completed in each size category (e.g. 1 bed, 2 bed, 3 bed, 4 bed and 5 bed dwellings) <i>Number of bedrooms for completed dwellings</i> 	
B105	147	BDP10 Homes for the Elderly	<ul style="list-style-type: none"> Number and types units completed for the elderly Number of dwellings completed to Lifetime Home Standards 	Correction
B106	147	BDP11 Accommodation for Gypsies, Travellers & Showpeople	<ul style="list-style-type: none"> Occupancy rates No of pitches provided in District <i>Net additional pitches (Gypsy and Traveller)</i> 	Correction
B107	147	BDP12 Sustainable Communities	<ul style="list-style-type: none"> Increase or decrease in the number of local facilities in the district <i>Diversity of Town Centre Uses (Street level property)</i> <i>Diversity of local centres (Street level property)</i> <i>% of open space, allotments , sports and recreational facilities lost to development</i> 	Correction
B108	148	BDP13 New Employment Development	<ul style="list-style-type: none"> <i>Total amount of additional employment over plan period</i> <i>Total amount of additional employment – by type</i> Total amount of Employment Completions (B1, B2, B8) Employment completions by Parish Amount of available employment land % of unemployment No. of VAT Registered businesses – registrations/deregistrations <i>Business births</i> <i>Business deaths</i> <i>Number of extensions granted to existing employment premises</i> 	Correction
B109	148	BDP14 Designated Employment	<ul style="list-style-type: none"> Amount of employment land lost to other uses Number of extensions granted to existing employment 	Correction

			<ul style="list-style-type: none"> premises <i>Total amount of employment on previously developed land</i> 	
B110	148	BDP15 Rural Renaissance	<ul style="list-style-type: none"> Number of agricultural dwellings completed Number of affordable houses completed through <i>rural exception schemes sites</i> 	Correction
B111	148	BDP16 Sustainable Transport	<ul style="list-style-type: none"> Number of bus and rail travellers % of peoples usual method of travel Number of trips made by public transport Proportion of new housing within 30 minutes by public transport from key facilities Proportion of development within 800 metres/13 minutes walk from hourly bus service % access to GP 	Correction
Page 12 Page 233	148	BDP17 Town Centre Regeneration	<ul style="list-style-type: none"> No. of Town Centre Delivery Sites completed Diversity of main Town Centre Uses (<i>Street level property</i>) Proportion of vacant street level property <i>Vacancy rates in town centre</i> Pedestrian flows <i>Progress of Town Centre development sites</i> <i>Total amount of retail (larger than 500m²)</i> 	Correction
B113	148	BDP18 Local Centres	<ul style="list-style-type: none"> Diversity of local centre uses (<i>Street level property</i>) Proportion of vacant street level property <i>Vacancy rates in local centres</i> 	Correction
B114	149	BDP19 High Quality Design	<ul style="list-style-type: none"> Proportion of relevant schemes incorporating “secured by design” principles % of people to which fear of crime is an issue Number of recorded crimes Number of <i>recorded</i> ASBO’s 	Correction

			<ul style="list-style-type: none"> • % Number of non-domestic residential developments buildings to meet meeting of BREEAM 'very good ' standard • Number of dwellings completed to Lifetime Homes standard • % of affordable housing to meet the Code for Sustainable Home Level 6 • The level of the Code for Sustainable Homes achieved by market (% achieved for each code level) • No. of schemes achieving <i>meeting</i> Building for Life 12 diamond status standards or its successor guidance • <i>Number of new developments incorporating SuDs</i> • <i>Emissions within the scope of influence of Local Authority</i> • Number of new AQMA's declared 	
B115 Page 234	149	BDP20 Managing the Historic Environment	<ul style="list-style-type: none"> • Total Number of listed buildings (<i>all grades</i>) • Number of Listed Buildings demolished • Number of listed buildings at risk • <i>Number of listed buildings and archaeological sites on English Heritage's register of buildings/sites 'at risk'</i> • Total Number of Registered Parks, Gardens and Scheduled Monuments • Number of Conservation Areas • Proportion of <i>Number of Conservation Areas with an up to date Character Appraisal Assessments completed and Management Plan</i> • Number of buildings on the Local List of architectural merit 	Correction
B116	149	BDP21 Natural Environment	<ul style="list-style-type: none"> • % of total land use under landscape designation • % of planning permissions granted in the <i>applications on Green Belt land approved</i> • % of planning permissions affecting areas of recognised landscape value • No. of SWS • No. of SSSI 	Correction

			<ul style="list-style-type: none"> • No. of BAP habitats • <i>Number of Local Sites (wildlife and geological) and proportion of Local Sites in positive management</i> • <i>Number of Sites of Special Scientific Interest (SSSI) and condition</i> 	
B117	150	BDP22 Climate Change	<ul style="list-style-type: none"> • Decrease in CO2 emissions • Climate Change Decrease in average electricity consumption per household/ year in line with Government targets • % of new developments with energy efficient design • Number of new AQMAs declared • <i>Emissions within the scope of influence of Local Authority</i> • Number of new developments with on-site renewable energy • <i>Number of renewable energy applications granted permission and their capacity</i> • <i>Amount of waste collected per annum</i> • <i>% of waste disposal to landfill per annum</i> • <i>% of waste recycled per year-annum</i> • Number of bus and rail travellers • % of peoples usual method of travel • Number of trips made by public transport • Proportion of new housing within 30 minutes by public transport from key facilities • Proportion of development within 800 metres/13 minutes walk from hourly bus service • Number of noise related complaints • Vehicle flows through urban areas • <i>Percentage of watercourses within the District that meet the targets set out in the Water Framework Directive</i> • % of rivers with fairly good or better biological and chemical 	Correction

			<p>water quality</p> <ul style="list-style-type: none"> • Number of new developments incorporating SuDs • Number of planning permissions granted contrary to advice of Environment Agency, the Lead Local Flood Authority or Internal Drainage Board • Number of new developments on flood plains • Number of schemes incorporating water harvesting • Number of new industries/companies developing new technology addressing climate change • Number of new developments incorporating opportunities for recycling 	
B118	150	BDP23 Water Management	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to advice of Environment Agency, the Lead Local Flood Authority or Internal Drainage Board • No of incidences of flooding • No of new properties built in the flood plain • % of watercourses within the District that meet the targets set out in the Water Framework Directive • Number of new developments incorporating SuDs 	Correction
B119	151	BDP24 Green Infrastructure	<ul style="list-style-type: none"> • Amount of open space on expansion/development sites • Amount of eligible open spaces managed to Green Flag award standard • % of open space, allotments, sports and recreational facilities lost to development • The number of applications that contribute towards the Worcestershire Green Infrastructure Strategy • No of parks and areas of recreation space • Green Infrastructure Proportion of eligible open space maintained to “green flag” standard • % of allotments lost to development • % loss of recreational land and/or buildings lost to 	Correction

			development	
B120	151	BDP25 Health and Well Being	<ul style="list-style-type: none"> • Number units and percentage of units with A5 use within the Town and Local Centres • % of obese children in Year 6 of Primary School • % of adults who are obese • % of adults who eat a healthy diet • % of adults who participate in recommended levels of physical activity • Average life expectancy • Mortality Rates from circulatory diseases under the age of 75 • Mortality rates from cancers under the age of 75 • Average yearly excess winter deaths • Total amount of leisure • No. of new cycle routes • No. of applications with cycling facilities • % of obese children in Year 6 of Primary School 	Correction

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Bromsgrove District Council

ADOPTION STATEMENT

Notice of Adoption of:

Bromsgrove District Plan 2011-2030 Development Plan Document (DPD)

In accordance with :

The Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012

The Localism Act 2011

The Environmental Assessment of Plans and Programmes Regulations 2004

Adoption Date

Notice is given that at a Council meeting on 25th January 2017, the Council formally adopted the Bromsgrove District Plan (BDP) 2011-2030 DPD and Policies Map.

The BDP was considered by an independent Inspector at an Examination in Public at hearing sessions held between June 2014 and March 2016. The Inspector's report was published on 19th December 2016 which concluded that the BDP is sound and legally compliant, subject to the Inspector's recommended Main Modifications. The adopted BDP incorporates the modifications recommended by the Inspector and minor modifications by the Council.

Subject matter and area covered

Now that it is adopted the BDP forms a key element of the Development Plan for Bromsgrove District. It replaces the Bromsgrove District Local Plan which was adopted in 2004.

The BDP outlines the spatial vision for sustainable development in the District up to 2030 and how it will be achieved against a set of objectives. The DPD sets the planning policies and identifies site specific allocations for both Bromsgrove District and Redditch Borough's needs.

Modifications

The adopted Plan includes the Main Modifications recommended by the Inspector and the minor modifications. The full list of modifications made to the Plan following receipt of the Inspector's report can be found in the Schedule of Main Modifications published as an Appendix to the Inspector's report and the Schedule of Minor Modifications published by the Council alongside the Inspector's report. The Schedules are available on the Council's website at www.bromsgrove.gov.uk/examination or at the Council's offices and public libraries.

Challenge

Any person who is aggrieved by the adoption of the BDP may make an application to the High Court under section 113 of the Planning and Compulsory Purchase Act 2004 on the grounds that:

- the document is not within the appropriate power
- a procedural requirement has not been complied with

Any such application must be made promptly and in any event no later than 6 weeks after the date on which the BDP was adopted i.e. **no later than 9th March 2017**.

Statement of document availability

The adopted BDP and Policies Map , this Adoption Statement and the Sustainability Appraisal Report and the Inspector's report are available for inspection at www.bromsgrove.gov.uk/examination and the following locations during normal opening hours.

All the material relating to the Examination process can also be viewed on the Council's website.

Council Offices:

Bromsgrove District Council, Parkside, Market St, Bromsgrove B61 8DA

Redditch Town Hall, Walter Stranz Square, Redditch, Worcestershire, B98 8AH

Libraries or Parish Council offices:

Bromsgrove library, Parkside, Market St, Bromsgrove, B61 8DA

Alvechurch Library, Birmingham Road, Alvechurch Birmingham, B48 7TA

Barnt Green Parish Council Office, 80 Hewell Road, Barnt Green, Worcestershire, B45 8NF

Catshill Community library, The Community Room, Catshill Middle School, Meadow Rd, Catshill, B61 0JW

Hagley library, Worcester Road, Hagley, Stourbridge, West Midlands, DY9 0NW
Rubery library, 7 Library Way Rubery, Birmingham, B45 9JS

Wythall library, Woodrush Community Hub, Shawhurst Lane, Hollywood, Birmingham, B47 5JW

Further Information:

Further information or advice may be obtained by telephoning 01527 881316 or by emailing: strategicplanning@bromsgrove.gov.uk

Sustainability Appraisal of the Bromsgrove District Plan

Post Adoption Statement

January 2017



Bromsgrove
District Council

www.bromsgrove.gov.uk

Appendix

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1. Introduction

1.1 This document provides the Post-Adoption Statement for the Bromsgrove District Plan 2011-2030, which was adopted on 25th January 2017 by Bromsgrove District Council.

1.2 The District Plan is the main basis for making decisions on planning applications within the administrative area of Bromsgrove District. The District Plan provides a general policy framework and suggests sites for development to meet the housing and employment needs of the District and, where justified, unmet needs arising from outside of the District.

1.3 A Sustainability Appraisal (SA) was undertaken whilst developing the District Plan. The purpose of the SA was to ensure that the environmental, social and economic issues were considered throughout the development of the District Plan with the aim of improving sustainability through its implementation.

1.4 The purpose of the Post-Adoption Statement is to satisfy the legislative requirements of Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations (2004).

1.5 BDC have previously produced the following key SA/HRA documents in the process of developing the District Plan:

1. Sustainability Appraisal Scoping Report 2004/ 2007
2. Sustainability Appraisal of the Local Development Documents Appraisal of Issues and Options Interim Report 2005
3. Bromsgrove Issues and Options Consultation SA update 2007
4. Sustainability Appraisal Scoping Report 2008/ 2011
5. Sustainability Appraisal for Draft Core Strategy 2008
6. Sustainability Appraisal for Draft Core Strategy 2010
7. Sustainability Appraisal of Strategic Site Options 2010
8. Sustainability Appraisal for Draft Bromsgrove Town Centre Area Action Plan
9. Sustainability Appraisal Scoping Report 2012/ 2015
10. Sustainability Appraisal for the Bromsgrove District and Redditch Borough Housing Growth Study 2013
11. Area Assessment Sustainability Appraisals 2013 (suite of documents)
12. Sustainability Appraisal of Bromsgrove District Plan Proposed Submission Version 2013
13. Habitats Regulation Assessment Screening Report 2013
14. Sustainability Appraisal Of Different Growth Levels 2014
15. Updated Bromsgrove District Plan Sustainability Appraisal (March 2015)
16. Updated Bromsgrove District Plan Sustainability Appraisal (May 2015)
17. Bromsgrove District Plan – Proposed Main Modifications Screening Matrix 2016

1.6 BDC took the findings and recommendations of the SA at each stage into account in preparing the District Plan before its Adoption.

1.7 Also taken into account were the findings of the Borough of Redditch Local Plan No.4 Sustainability Appraisal (March/May 2015) as this informed the cross boundary site selection process.

1.8 Most of the SA work was carried out by the Strategic Planning Team at Bromsgrove District Council, apart from the Sustainability Appraisal of the Local Development Documents Appraisal of Issues and Options Interim Report 2005 (Hyder Consulting UK Ltd). The Updated Bromsgrove District Plan Sustainability Appraisal (May 2015), whilst being carried in house, was verified by private consultants Amec Foster Wheeler.

2. Legislative background

2.1 European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment ('the SEA Directive') states that a Strategic Environmental Assessment is mandatory for plans prepared for town and country planning and land use purposes.

2.2 The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the Sustainability Appraisal of local development plan documents.

2.3 The Town and Country Planning (Local Planning) Regulations (2012) states that a Sustainability Appraisal report must be completed for Local Plan documents in accordance with section 19(5) of the Planning and Compulsory Purchase Act (2004).

2.4 In accordance with these regulations, a Sustainability Appraisal was prepared for the District Plan under the following requirements:

- Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004 implementing the European SEA Directive.
- Paragraph 165 of the National Planning Policy Framework (NPPF, 2012).

2.5 Article 9 of the SEA Directive requires that when a plan or programme is adopted, the Council makes available a statement summarising:
“how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.”

2.6 This requirement in European law has been transposed into UK law through Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the responsible authority to produce a statement

containing the following information as soon as reasonably practical after the adoption of a plan or programme:

- 1) how environmental considerations have been integrated into the plan or programme;
- 2) how the environmental report has been taken into account;
- 3) how opinions expressed in response to:
 - i. the invitation referred to in regulation 13(2)(d);
 - ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
- 4) how the results of any consultations entered into under regulation 14(4) have been taken into account;
- 5) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- 6) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (Regulation 16).

3. How environmental considerations have been integrated into the District Plan

3.1 The Sustainability Appraisal process involves assessing the performance of a plan or a programme against a series of sustainability objectives to test whether it is likely to result in significant environmental effects. These sustainability objectives and associated questions guide the evaluation of proposed policies and sites through a sustainability framework.

3.2 The sustainability framework for the District Plan was developed during the scoping stage for the Sustainability Appraisal by considering the following:

- The environmental objectives of other plans, programmes and objectives on a local, national and international scale;
- the characteristics of Bromsgrove District and;
- the key environmental problems within Bromsgrove District

3.3 This ensured that both the wider environmental considerations and the specific environmental problems in Bromsgrove District were integrated into the sustainability framework and therefore the District Plan, since each policy and allocation was tested using the sustainability framework.

3.4 The key sustainability issues and problems and how they are reflected in the sustainability framework is set out in Appendix A below.

3.5 The sustainability framework for the District Plan considers each of the environmental topics set out in Annex 1 of the SEA Directive and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004), as shown in Table 1.2 Page 7 of the Sustainability Appraisal for the Bromsgrove District Plan dated 18 May 2015. The full range of environmental considerations was therefore integrated into the District Plan.

3.6 The Environment Agency, Natural England and Historic England (formerly known as English Heritage) were consulted as statutory consultees during the development

of the sustainability framework and during the SA Scoping stages, this ensured that the sustainability framework addressed the key environmental considerations of other organisations.

4. How the environmental report has been taken into account

4.1 The SA must be an integral part of producing the Plan being appraised. The section below describes the process by which the SA influenced the development of the District Plan.

4.2 The SA identified relevant sustainability objectives for the District and provided an objective assessment of the likely significant effects of the policies and site allocations throughout the preparation of the District Plan.

4.3 At each stage the SA recommends a series of mitigation measures to reduce or avoid the potential adverse effects and maximise the potential beneficial effects arising from the implementation of the District Plan and these changes have been incorporated into the final District Plan.

4.4 The SA has informed the selection of preferred options through an objective appraisal of a range of reasonable options and alternatives against the framework of sustainability objectives for the District. The types of options considered fall into the following categories:

- Alternatives to the development strategy
- Alternative locations for development
- Alternative levels of growth
- 'Do nothing' option

4.5 Appendix B provides details of the key stages of SA consultation during the preparation of the Plan and how this has been taken into account.

5. How the SA and Consultation Representations have been taken into account.

5.1 The SEA Directive requires the opinions expressed by consultees to be taken into account during the preparation of the plan before its adoption. Consultation is therefore an important aspect of plan making and SA and this is summarised in Appendix B.

5.2 Appendix B demonstrates that there was consultation of every key stage of the Plan's preparation and that this included consultation on the associated SA documents. SA scoping included statutory consultation with environmental bodies (Environment Agency, Natural England, Historic England/English Heritage in accordance with Regulation 13 (2) SEA Regulations) and public consultation. A summary of consultee comments on the 2005, 2008 and 2012 SA Scoping reports is contained in Appendix 7, 8 and 9 Pages 172 -186 of the 2012 Scoping Report. The Consultation Statements prepared in 2008, 2011 and 2013 summarise responses to consultation and, where appropriate, detail how these changes have been incorporated into the plan making process.

5.3 Regulation 22 (1) (c) (v) of the Town and Country Planning (Local Development) (England) Regulations 2012 sets out details of the publication of the BDP, how consultation was carried out and summarises all of the responses received. It was not appropriate to prepare Officer responses at this stage of the process as the Plan had already been submitted and this was the version the Inspector would be basing the Examination in Public on. All of these documents are available on the website.

5.4 All representations on the SA were collated and summarised at each stage of plan preparation and Officer responses were made addressing the comments of consultees. This ensured that the SA and consultation responses were considered in an iterative and ongoing way throughout the plan making process. There was no requirement for any transboundary consultations with other member States as the BDP is not likely to have any significant effects on the environment of another member State.

5.5 During the Redditch Examination hearing sessions in September 2014 clarifications were requested by the Inspector concerning the cross boundary site selection process carried out as part of the Housing Growth Development Study and accompanying SA in January 2013. An Addendum to the HGDS and SA (the HGDS Addendum) was produced in November 2014.

5.6 On publication of external Hearing Statements for the cross boundary hearing sessions some queries were raised concerning the SA process. A further revision to the Redditch SA was produced by AMEC Foster Wheeler on behalf of Redditch Borough Council in March 2015. This was consulted on and republished in May 2015. The BDP SA was also updated at this time (in house but verified by AMEC Foster Wheeler) to ensure alignment continued with the Redditch SA. Both the updated BDPSA and the BORLP4SA May 2015 contained quality assurance checklists that demonstrated how the SA's complied with the SEA Directive (page 57 of the BDPSA)

5.7 A table showing all the responses to the SA consultation carried out between March and April 2015 was published on the Councils' websites. This included a summary of the response, officers' comments and proposed action (OED/33A). Corresponding amendments were also made to both SA's as a result of this consultation (OED/ 33B –Redditch and OED/34 Bromsgrove). The Sustainability Appraisal of the Bromsgrove District Plan May 2015 details changes made as a result of the consultation at the beginning of the Document.

5.8 At the Examination hearing sessions in June 2015 it was confirmed that the BDPSA did not in itself contain a detailed assessment of growth options for Redditch within the BDP area, and that it referred instead to the BORLP4 SA. The Inspector accepted this as a suitably pragmatic approach and saw no benefit in duplicating the exercise and the BDP SA (as updated) provided appropriate cross-references to the relevant documentation.

5.9 During the final cross-boundary hearing sessions concerns were re-expressed regarding various SA issues and at the final joint examination session on 24 March 2016 the Inspector requested a Legal Opinion commissioned by the Councils on whether the SA's complied with the SEA Directive. This Opinion confirmed legal

compliance and was published on the Councils' websites on 20 April 2016 (Reference ED/50-Legal Opinion on behalf of the Councils on SEA, April 2016).

5.10 A screening of the proposed Main Modifications to the BDP following Examination found that no significant environment effects were likely and therefore further SA is not required. This screening is available as a separate document.

6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives

6.1 This is explained in detail in the document the Sustainability Appraisal of the Bromsgrove District Plan May 2015 (page 89 under the title '*Evolution of the BDP and Reasonable Alternatives considered*'). This covers reasonable alternatives for both Bromsgrove's needs and those arising from cross-boundary agreement.

6.2 At each stage of the evolution of the BDP, reasonable alternative options have been identified and appraised, with detailed explanation given on the reasons for choosing the proposed option, taking account of consultee representations, planning considerations and sustainability analysis. The Submission BDP and accompanying SA set out detailed consideration of all the policies and potential housing sites and ensures that all reasonable alternatives were explicitly tested against one another. Particular attention was paid to the need to provide for development in Bromsgrove District to meet the needs of Redditch, and detailed evaluation of options relating to such strategic provision was undertaken and appraised.

6.3 The SA report identifies a number of likely effects associated with strategic sites and policy options and the likelihood and scale of these effects. Mitigation or remedial measures have also been proposed that maximise any predicted beneficial effects of the proposed options or approaches and that minimise any predicted adverse effects.

7. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (regulation 16)

7.1 The significant environmental effects of the plan are summarised on page 177 of the Sustainability Appraisal of the Bromsgrove District Plan May 2015 whereby mitigation measures are also identified. These will be monitored as set out in this document on pages 48/49 which states:

'Once the BDP is adopted its effects will continue to be monitored against the identified sustainability indicators to measure how well the plan has contributed to sustainability (alongside monitoring the indicators for the Plan). Appendix D identifies the SA Objectives and indicators developed by Bromsgrove DC. The data collected will form the baseline to which future effects will be compared and the results will help inform the preparation of the District Plan Review (following the Green Belt Review). The policies contained in the Plan will be monitored through the Councils Annual Monitoring Report (AMR) which is normally published around Dec/Jan annually and which oversees and reports on the progress of the Plan.'

7.2 Monitoring indicators are set out in the BDP Appendix V page 146 of the Proposed Submission version of the Plan September 2013.

Appendix A - key sustainability issues and the sustainability framework

Topic	Baseline and trends	Key sustainability issues	How this is reflected in the sustainability framework
Social			
Rising older population	Bromsgrove has an above average older population with corresponding resultant impacts on service provision, housing needs and workforce availability. 2011 Census approximately 20% of population were aged 65-plus. This number is projected to increase by around 11,300 by 2030 (compared to 800 in the 0-17 age group)	Provision of appropriate housing ie tenures and types, services and facilities.	SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean, safe and pleasant local environment
Barriers to housing and services in rural areas	Bromsgrove District ¹ has consistently demonstrated higher house prices than the national average and Worcestershire. However the housing market is also experiencing issues around supply since the recession in 2008. The District has many small settlements with limited or without their own services. Many local facilities and transport options are considered unviable due to dispersed population. Some households are unable to afford to purchase or rent on the open market in Bromsgrove District with house price increases far outstripping earnings increases ²	Range of house types including affordable housing	SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean, safe and pleasant local environment 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
Local facilities to meet the needs of the population	Facilities lost due to high housing development rates leading to an imbalance in service provision to population size.	Support local centres and villages	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
Under-provision of affordable housing	Limited affordable housing for local people leading to social exclusion and harm to community life and networks	Provision of affordable housing Social cohesion	SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean, safe and pleasant local environment
An increase in young residents leaving in search of work and housing	Young people that cannot afford to live in the District and those who work outside the District are moving away.	Provision of affordable housing	SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean, safe and pleasant local environment
Keeping the sense of community 'alive'	19 parishes in District, only a handful have expressed interest in pursuing Neighbourhood Plans. In 2011 32,755 votes were cast in district elections, representing a 44.7 per cent turnout	Community Engagement and Consultation.	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
Reducing fear of crime	Bromsgrove is a safe place to live and fear of crime has reduced since surveys were carried out in 2005.	High quality designed environments.	SO4 Reduce crime, fear of crime and anti-social behaviour
Housing to meet local needs	The Strategic Housing Market Assessment provides evidence for the housing figures appropriate for Bromsgrove District	Provide range of house types and tenures to meet needs	SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean, safe and pleasant local environment
Possible cross boundary growth in the District	The Strategic Housing Market Assessment provides evidence for the housing figures appropriate for Redditch Borough. The Strategic Housing Market Assessment commissioned by Birmingham City Council also provides evidence for the housing figures in the City (also informed by GBSLEP Joint strategic housing study).	Making best use of land	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
Environmental			
Implications of redeveloping brownfield land	High density development within existing settlements can have negative impact on local environments and brownfield sites can be biodiversity-rich. However supply of brownfield land is	Making best use of land	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

¹ AMION report Housing Needs Assessment 29.8.14 Appendix B House Prices [ED/14]

² AMION report Housing Needs Assessment 29.8.14 Appendix B Affordability [ED/14]

Topic	Baseline and trends	Key sustainability issues	How this is reflected in the sustainability framework
	running out in the District, placing more pressure on greenfield land and ultimately the potential release of Green Belt land.		where this is not detrimental to open space and biodiversity interest
Large identified greenfield sites for future development needs	A number of large greenfield sites were removed from the Green Belt or not confirmed as Green Belt through the Bromsgrove District Local Plan (2004) and designated as Areas of Development Restraint (ADRs). ADRs were reserved for future development beyond the life of the Local Plan	Efficient use of land	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
Commuting out of the District	District population earn higher than average salaries but they earn then outside the District.	Increase employment opportunities within District.	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.
High car usage and congestion	High amount of car usage compared to sustainable transport leading to congested roads at peak periods and costs associated with this include for example costs to businesses and poor air quality. 2011 census showed that the number of people travelling to work by car (49.9%) is higher than the national average (36.9%) Only 12.5% of households in Bromsgrove do not own a car or van compared to 16.6% in Worcestershire and 25.8% in England. Rural areas are served by infrequent bus services.	Sustainable transport modes. Sustainable/mixed use development.	SO5 Increase sustainable travel choices and move towards more sustainable travel patterns
Air quality	Although the District benefits from excellent strategic road connections, it does experience localised air quality problems caused by high traffic volumes. Bromsgrove has 4 declared Air Quality Management Areas (AQMAs).	Sustainable transport modes Air quality monitoring Health	SO5 Increase sustainable travel choices and move towards more sustainable travel patterns SO2 To improve the health and well-being of the population and reduce inequalities in health
Degradation of the Natural and Historic Environment	Degradation of the environment as a whole has been realised incrementally over time as a result of damaging land use practices, development pressures, neglect/decay of heritage assets at risk, traffic congestion, air quality, noise pollution, loss/erosion of landscape/townscape character or quality, climate change and so on. Specific concerns includes conservation of biodiversity, cultural heritage, historic assets, character of the townscape, landscape character and the protection of groundwater supplies. 6 out of 14 SSSI's are described as 'favourable'. As the more densely populated areas such as Bromsgrove Town, Catshill and Hagley are highly sensitive in terms of protection of groundwater and appropriate measures will need to be taken to ensure underlying aquifers are protected. Bromsgrove has 2 listed buildings, 5 scheduled Ancient monuments, a conservation area and Registered Historic Park and Garden on the National 'Heritage at risk' register. Large portions of evidence in the form of archaeological deposits and structures above and below ground have already been destroyed by previous development especially in the 1960's. The District has many locally important buildings that do not qualify for national	Protection of certain land from development and appropriate consideration of settings. Landscape protection and enhancement. Conservation and enhancement of biodiversity Protection of Heritage Assets Health improvement	EV1 To conserve and enhance biodiversity and geodiversity EV4 Conserve, protect and enhance the architectural, cultural and historic environment, heritage and seek well-designed, high quality built environment in new development proposals EV3 Safeguard and strengthen landscape and townscape character and quality

Topic	Baseline and trends	Key sustainability issues	How this is reflected in the sustainability framework
	listing but nevertheless are important to the distinctive character of Bromsgrove.		
Responding to climate change	<p>Improvement and promotion of sustainable transport and energy efficiency, etc can all help reduce the causes of climate change. Flood risk within the District is mainly associated with flash flooding and climate change means that more extreme weather is likely to happen. This includes hotter and wetter summer and drier and colder winters.</p> <p>No major rivers run through the District. Flood risk is concentrated in a few places with the risk of major flooding being minimal.</p> <p>Increasing human demand for water, coupled with the effects of climate change mean the future of our water supply is not secure. Bromsgrove falls within the Severn River Basin District and assessment of 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 by 2015. The existing abstraction has also led to negative environmental impacts in several areas in the District.</p> <p>In Bromsgrove the highest CO2 emissions correlate with the M5 and M42 motorway corridors whilst in other predominantly rural areas emissions are low.</p>	<p>Climate change</p> <p>Flood risk management</p> <p>Water Efficiency</p> <p>Air quality monitoring</p>	<p>EV5 To manage waste in accordance with the waste hierarchy, 1) Prevention, 2) Preparing for reuse, 3) Recycling, 4) Other recovery, 5) Disposal</p> <p>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.</p> <p>EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources.</p> <p>EV8 Protect and enhance the quality of water, soil and air</p> <p>EV9 Reduce causes of and adapt to the impacts of climate change.</p>
Economic			
Changing economy	<p>The District is undergoing a change in its economy from heavy industry to high tech industries. For example, MG Rover, once a major employer of Bromsgrove residents, was closed down in 2005.</p> <p>2011 census 3.1% unemployed (West Midlands 5.1% and 4.4% nationally)</p>	<p>Support and encouragement for existing and new businesses.</p> <p>Supporting farming and rural diversification.</p> <p>Homeworking.</p> <p>Lifelong education and learning skills</p> <p>Infrastructure</p>	<p>EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural.</p> <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> <p>EC3 To raise the skills levels and qualifications of workforce and quality of education opportunities for all.</p>
The revival of the town centre as well as regeneration at Longbridge	<p>The Town Centre is perceived as 'run down' and has a high vacancy rate. The Town Centre Health check indicates that the vacancy rate has decreased year on year until 2013 where there has been a consecutive increase in 2013 and 2014 albeit vacancy rates are still lower than 2009.</p> <p>The MG Rover plant in Longbridge was closed down in 2005</p>	<p>Regeneration of Town Centre and Longbridge</p>	<p>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</p>

Appendix B - Key Stages in the BDP SA process

Document	Summary
Sustainability Appraisal of the Local Development Documents Appraisal of Issues and Options Interim Report 2005	Consultation of the Issues and Options was undertaken in 2005. Each core issue presented had a set of alternative options presented as possible solutions to the issues. The key issues and options identified were Locations for Growth; Housing for Everyone; Rural Life; the Local Economy and Creating Jobs; Shopping and Bromsgrove Town Centre; Learning, Leisure and Improving Health; Our natural Environment; Getting Around and Preserving the Past. Each of the options was assessed in the Sustainability Report carried out by Hyder Consulting UK Ltd and makes key recommendations whereby some options were amended and/or other options being combined. Those progressed had the least negative effects on environmental factors and most positive effects on social and economic factors as well as reflecting the overall Plan Strategy and being capable of delivery over the Plan Period.
Bromsgrove Issues and Options Consultation SA update 2007	A further Issues and Options Consultation was carried out in 2007. This consultation was carried out as further key issues and options had been identified in the intervening period, including new housing growth; climate change and renewable energy; flooding; waste and recycling and biodiversity. Issues around new housing growth had changed in the intervening period due to the revised context of the RSS. The above report was updated and again those options with the greatest support, the least negative impacts on sustainability factors as well as reflecting the overall Plan Strategy and capable of delivery were progressed and included in policies within the Plan
Sustainability Appraisal for Draft Core Strategy 2008	This SA appraised all of the proposed policies which included general policies to guide development and raised the issue of cross boundary growth. There were 4 agencies/businesses that responded to this SA consultation, some were supportive and some recommended changes or pointed out minor typos. Changes were made to the Plan where appropriate on the basis of these responses.
Sustainability Appraisal of Strategic Site Options 2010	In order to better understand the implications of the Strategic Sites options, a Sustainability Appraisal of each of the 7 broad areas identified in this document was undertaken. The assessment helped to determine which areas could deliver the most sustainable form of development for Bromsgrove Town.
Sustainability Appraisal for Draft Core Strategy 2011 (DCS2)	This updated version of the Core Strategy also appraised the policies but did not include mention of cross boundary growth to reflect the aspirations of the Redditch Plan. Again 4 agencies/individuals responded to the SA consultation at this stage. Changes were made to the Plan as Appropriate or further discussions were held with relevant services and/or additional evidence gathered.
Sustainability Appraisal for Draft Bromsgrove Town Centre Area Action Plan	An SA of the draft TCAAP was undertaken and consulted upon in 2011. This AAP was not progressed but many of the policies proposed were incorporated in the BDP in policy BDP 17 Town Centre Regeneration.
Sustainability Appraisal for the Bromsgrove District and Redditch Borough Housing Growth Study 2013	This document accompanied the HGDS consulted on in 2013. It compared strategic objectives against SA objectives, area assessment principles against SA objectives, SA of broad options and SA of alternative growth options.
Area Assessment Sustainability Appraisals 2013	This suite of documents identifies sites around all of the large settlements in Bromsgrove District and identifies which of these sites performs best in sustainability terms. This influenced the selection of development sites in the BDP.
Sustainability Appraisal of Bromsgrove District Plan Proposed Submission Version 2013	This SA, inter alia, carried out a SA of all the policies of the BDP. It identified key strengths, weaknesses and made recommendations for mitigation. This SA accompanied the BDP at proposed Submission stage in September 2013.
Habitats Regulation Assessment Screening Report 2013	The European Habitats Directive (European Communities, 1992) requires an assessment to be made of the possible effects of certain plans on the integrity of 'European Sites' before the plan is adopted. 'European sites' - comprise: Special Areas of Conservation (SACs), for habitats; Special Protection Areas (SPAs), for birds); and also Sites designated under the Ramsar Convention as wetlands of international importance. The screening assessment concluded that the implementation of the Bromsgrove District Plan will have no 'likely significant effects' on any Natura 2000 site, alone or in combination with other plans or projects. Therefore Stage II Appropriate Assessment would not be required.
Sustainability Appraisal Of Different Growth Levels 2014	Different growth levels were assessed throughout the evolution of the Bromsgrove District Plan. Each level of growth was assessed individually and the sustainability outcomes compared. Overall, it was considered that the growth level of 7,000 performs best due to its beneficial performance against social and economic objectives. It has been identified that lower levels of growth (2,100 and 4,000) would deliver much more limited social and economic benefits whilst the highest growth figures (9,600 and 10,500) would potentially cause significant environmental harm. It was therefore recommended that the figure of 7,000 was incorporated into the Bromsgrove District Plan.
Updated Bromsgrove District Plan Sustainability Appraisal (March and May 2015)	A final SA report was produced in May 2015 as part of the iterative process of SA, incorporating some changes made during consultation in March 2015 version of the Bromsgrove SA. This was produced to make clear legal compliancy and ensure alignment with the Redditch SA was maintained.
Borough of Redditch Local Plan No.4 Sustainability Appraisal (March/May 2015)	This document informed the cross boundary site selection process.
Bromsgrove District Plan – Proposed Main Modifications Screening Matrix 2016	SA screening of the Inspector's proposed Main Modifications was carried out. Council did not consider that the Main modifications proposed by the Inspector (nor minor ones proposed by the Council) would lead to significant changes and therefore did not require further consultation or SA work

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