



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 26th June 2019, when the business referred to below will be brought under consideration:-

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 22nd May 2019 (Pages 1 - 4)**

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. **Overview and Scrutiny Board Annual Report 2018/19 (Pages 5 - 28)**

8. **Audit, Standards & Governance Annual Report 2018/19 (Pages 29 - 38)**

9. **Recommendations from the Cabinet (Pages 39 - 40)**

To consider the recommendations from the meeting(s) of the Cabinet held on 10th April and 6th June 2019.

10. **Overview & Scrutiny Board Transport Planning Review Final Report**
(Pages 41 - 66)

11. **To note the minutes of the meetings of the Cabinet held on 10th April and 12th June 2019** (Pages 67 - 76)

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

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

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.

13. **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.

14. **Background Information on the recommendations from the Cabinet**

- (i) Response to Solihull Supplementary Local Plan Consultation (Pages 77 - 82)
- (ii) High Quality Design Supplementary Planning Document (Pages 83 - 158)
- (iii) Statements of Common Ground and the Plan Making Process (Pages 159 - 172)

K. DICKS
Chief Executive

Parkside
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BROMSGROVE
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TO ALL MEMBERS OF THE BROMSGROVE DISTRICT COUNCIL

BROMSGROVE DISTRICT COUNCIL

MEETING OF THE COUNCIL

22ND MAY 2019, AT 6.00 P.M.

PRESENT: Councillors R. J. Laight (Chairman), A. J. B. Beaumont (Vice-Chairman), S. J. Baxter, S. R. Colella, G. N. Denaro, S. P. Douglas, A. B. L. English, M. Glass, S. G. Hession, C.A. Hotham, S. A. Hughes, R. J. Hunter, H. J. Jones, A. D. Kent, J. E. King, A. D. Kriss, L. C. R. Mallett, K.J. May, M. Middleton, P. M. McDonald, H. D. N. Rone-Clarke, M. A. Sherrey, C. J. Spencer, P.L. Thomas, M. Thompson, J. Till, K. J. Van Der Plank, S. A. Webb and P. J. Whittaker

1\19 **ELECTION OF CHAIRMAN**

It was proposed by Councillor K. J. May and seconded by Councillor G. N. Denaro and

RESOLVED that Councillor R. J. Laight be elected Chairman of the Council for the ensuing year.

Councillor Laight signed the Declaration of Acceptance of Office and thanked Members of the Council for electing him to the Office of Chairman.

2\19 **ELECTION OF VICE-CHAIRMAN**

It was proposed by Councillor K. J. May and seconded by Councillor G. N. Denaro and

RESOLVED that Councillor A. J. B. Beaumont be elected Vice-Chairman of the Council for the ensuing year.

Councillor Beaumont signed the Declaration of Acceptance of Office and thanked Members of the Council for electing him to the office of Vice Chairman.

3\19 **VOTE OF THANKS TO RETIRING OFFICE HOLDERS**

The Chairman paid tribute to the retiring Chairman, Councillor C. J. Spencer and presented her with a plant as a mark of the Council's appreciation of her acting as Chairman. It was proposed by the Chairman and

RESOLVED that the thanks of the Council be tendered to Councillor C. J. Spencer for services rendered as Chairman of the Council.

The Chairman presented Mr. J. Spencer with a small gift as a mark of the Council's appreciation of his acting as consort to the Chairman during the year.

4\19 **ELECTION OF LEADER OF THE COUNCIL**

It was proposed by Councillor G. N. Denaro and seconded by Councillor M. A. Sherrey and

RESOLVED that Councillor K. J. May be elected as Leader of the Council for a period of four years until the Annual meeting of the Council following the local elections in 2023.

Councillor May thanked Members of the Council for electing her to the office of Leader of the Council.

5\19 **APOLOGIES**

Apologies for absence were received from Councillors R. J. Deeming and R. Jenkins.

6\19 **DECLARATIONS OF INTEREST**

Councillor R. Laight declared an other disclosable interest in his role as Chairman of the Trustees of the Primrose Hospice, his chosen charity for his year in office as Chairman.

7\19 **MINUTES**

The minutes of the meeting of the Council meeting held on 27th March 2019 were submitted.

During the consideration of the minutes the following areas were raised as a matter of accuracy:

- Councillor C. Hotham asked for it to be noted that he was absent from the named vote as detailed on page 17 of the minutes as he had not returned to his seat in time, following a short adjournment of the meeting.
- Councillor L. Mallett referred to page 21 of the minutes and asked whether the Leader had written to the Secretary of State for Health and Shadow Chancellor John McDonnell as stated in the minutes and whether any response had been received. The Leader confirmed that she had written to the Secretary of State for Health and was awaiting a response. She would be writing to John McDonnell the following day.
- Councillor M. Thompson referred to the backlog of notices of motion following the previous meeting and suggested that the

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22nd May 2019

Group Leaders arrange to meet, prior to the next Council meeting, to discuss this. The Leader was in agreement to this and agreed to make the necessary arrangements.

RESOLVED that the minutes of the meeting of the Council held on 27th March 2019 be approved as a correct record, subject to the pre-amble above.

8\19 **TO RECEIVE ANY ANNOUNCEMENTS FROM THE CHAIRMAN AND/OR HEAD OF PAID SERVICE**

The Chairman confirmed that his chosen charity during his year of office would be the Primrose Hospice. He also advised that the Reverent R. Khan would be his Chaplin.

9\19 **TO RECEIVE ANY ANNOUNCEMENTS FROM THE LEADER INCLUDING APPOINTMENT OF DEPUTY LEADER AND MEMBERSHIP OF THE CABINET**

The Leader announced that the Deputy Leader would be Councillor G. Denaro. She also announced that the membership of the Cabinet would be as follows for the ensuing year:

Cllr Karen May	Leader and Portfolio Holder for Economic Development, the Town Centre and Strategic Partnerships.
Cllr Geoff Denaro	Deputy Leader and Portfolio Holder for Finance and Enabling (including Governance/Policy and Performance/HR).
Cllr Shirley Webb	Portfolio Holder for Strategic Housing and Health and Well Being.
Cllr Adam Kent	Portfolio Holder for Planning and Regulatory Services.
Cllr Margaret Sherrey	Portfolio Holder for Environmental Services.
Cllr Phil Thomas	Portfolio Holder for Leisure, Cultural Services and Community Safety.

10\19 **APPOINTMENT OF COMMITTEES 2019-20**

It was proposed by Councillor G. Denaro and seconded by Councillor K. May and

RESOLVED:

- (a) that for the ensuing Municipal Year, the Committees set out in the table in Appendix 1 of the report, be appointed and that the representation of the different political groups on the Council on those Committees be as set out in that table until the next Annual Meeting of the Council, or until the next review of political representation under Section 15 of the Local Government and Housing Act 1989, whichever is the earlier;

- (b) that Members be appointed to the Committees and as Substitute Members in accordance with the nominations made by Group Leaders and as set out at appendix 1 to these minutes; and
- (c) that the terms of reference for the Boards and committees as set out at Appendix 2 to the report be confirmed.

11\19

SCHEME OF DELEGATIONS

Councillor G. Denaro introduced the report and in so doing reminded Members that there had been a full review of the Scheme of Delegations in the previous municipal year, which had been considered by Council. The Scheme of Delegations was regularly reviewed through the Constitution Review Working Group. Any changes that had been made reflected changes in legislation, job titles and reallocation of functions and did not extend to actual delegations. Councillor Denaro proposed that Council adopt the scheme of delegations and this was seconded by Councillor K. May.

RESOLVED that the current version of the Officer Scheme of Delegations as set out at Appendix 1 to the report be adopted.

12\19

APPOINTMENTS TO OUTSIDE BODIES

Council considered a report of the Head of Legal, Equalities and Democratic Services in respect of appointments to Outside Bodies. Councillor G. Denaro listed and proposed a number of nominees to the Outside Bodies and these were seconded by Councillor K. May

RESOLVED that the appointments to outside bodies as set out in the appendix to these minutes be approved.

The meeting closed at 6.32 p.m.

Chairman

BROMSGROVE DISTRICT COUNCIL
OVERVIEW AND SCRUTINY BOARD
ANNUAL REPORT

2018 – 2019



Bromsgrove
District Council
www.bromsgrove.gov.uk

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Foreword

Welcome to Bromsgrove District Council's Overview and Scrutiny Board's Annual Report for 2018/2019 municipal year.

Overview and Scrutiny plays a vital role in the ensuring the effectiveness and efficiency of the Council's democratic structures and in ensuring continuous service improvement, value for money and the effective operation of the Council. The role of scrutiny and challenge is even more key in a time of reducing funding, where the pressures on the council's budgets means that the authority needs to diversify its income and make some difficult decisions about how services are provided.

The past 12 months have seen a wide range of activity and discussion at the Overview and Scrutiny Board.

There have been a number of formal task groups this year. The activity of these task groups are detailed in our report. They include the Road Safety Around Schools Task Group, whose recommendations were accepted by the Cabinet. Other task groups concluded this year included the CCTV (Short, Sharp Review); Hospital Car Parking. The Board also agreed to further reviews this year – Bromsgrove Sporting and the Business Rates Relief (Short, Sharp Review). My thanks to all Council Members who have been part of these task groups/reviews this year, and in particular to those who have led the reviews.

Along with the formal task groups the whole Board has been involved in a range of Pre-Scrutiny and other reviews. These have included:

- Arrangements for the management of Bromsgrove Market
- Development of Burcot Lane site
- Waste service provision
- Corporate Peer Challenge Action Plan
- AQMA at Hagley (revocation) and wider discussion of air quality in the District
- Anti-Social Behaviour, Crime and Policing Act (2014) implementation of provisions
- Council Tax Support scheme pre-scrutiny
- Sports Hall Options Appraisal – pre-scrutiny

Additionally, a key area of the work of the Board this year has continued to be focussed on reviewing the transport strategy within Bromsgrove. Full Council and the Board have repeatedly identified concerns about the input of Worcestershire County Council's Highways development function. The full Board and a sub-group have worked with officers from both authorities to try to understand a way forward, recommendations were made by the Board at the end of the municipal year.

The working groups, Finance and Budget (FBWG) and Corporate Performance (formerly the Measures Dashboard WG) have continued this year and have added value and depth to the work of the Board. These working groups have enabled members to provide input on the budget and on early stage business cases. I

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believe that having these working groups in place strengthens the scrutiny function of the Council significantly.

The Board has continued to provide representation for the District Council at the County's Health Overview and Scrutiny Committee. My thanks go to Cllr Chris Bloore for undertaking this important role over the past twelve months.

I would like to thank all the members of the Board, in particular the Vice Chairman, Cllr Shirley Webb, and the Democratic Services Officers who have so efficiently supported the growing work of the Board this year.

**Councillor Luke Mallett
Chairman**

Introduction

This report outlines the work undertaken by the Overview and Scrutiny Board of Bromsgrove District Council during 2018 – 2019.

It should be noted that in June 2015 Members of the Board agreed that, as Overview and Scrutiny should be seen as not being party political, they would use white name plates, which did not reference a political group and sit in alphabetical order. This has continued to be the case in this municipal year and at the meeting held on 11th February 2019 Members debated this matter again and considered a number of options going forward. The outcome of that debate was to continue with the white name plates and the seating arrangements, as Members were in agreement that this approach had worked well at previous meetings and there was no reason why it should not continue.

The Role of Overview and Scrutiny

The role of overview and scrutiny is an important one in the Council's governance structure; it provides a vital role in challenging and driving improvement. It is a key part of the democratic decision making process in local Councils, where elected Councillors outside of the Cabinet can contribute to shaping Council policy, community well-being and accountability. It is often referred to as the "critical friend" of the Council and can hold a magnifying glass over any area which is causing concern or issues for local residents.

The Overview and Scrutiny Board has a number of roles within the Council. These include:

- Holding the Cabinet to account by thoroughly scrutinising their decisions to ensure that the Council continues to provide the best services possible for Bromsgrove District residents.
- Acting as a 'critical friend' to the Cabinet by reviewing Council policies and strategy, making recommendations where appropriate.
- Performance and financial monitoring, to ensure the Council services provide value for money, are sustainable and to the highest possible standard.
- Pre-scrutiny of items prior to the consideration by the Cabinet.

All of these can be achieved in a number of ways, either through presentation of a report at the Overview and Scrutiny Board or if a more in depth investigation is needed then the Board can set up a Task Group to focus on specific areas and recommend ways to improve existing practices within the Council. A template of the topic proposal can be found in Appendix A.

The detailed terms of reference and procedure rules for the Overview and Scrutiny Board can be found at Part 5 and Part 12 of the Council's Constitution. The Council's Constitution can be accessed by using the following link.

<http://svmoderngov:9072/ieListMeetings.aspx?CId=329&Year=0> (Please click on the latest date to access the most recent version of the Council's constitution).

Who attended the Overview and Scrutiny Board Meetings?

The Overview and Scrutiny Board met ten times in 2018/19, the meetings were attended by Elected Members, a range of representatives from partner organisations, the Chief Executive, Directors, Heads of Service and Officers.

There has been continued support from the relevant Portfolio Holders this year, with regularly attendance from a number of them when a report which relates to their portfolio has been presented to the Board. This has given them an opportunity to hear first-hand the debate and ideas that the Board have put forward. On a number of occasions, whilst the Board has not made any recommendations in respect of an item it has endorsed and supported recommendations which would be considered by Cabinet at its meeting.

If you would like further information on the role of Overview and Scrutiny at the Council you can find full details of all meetings and copies of Task Group reports on the Council's website.

Membership

Membership of the Board for 2018/2019 is as follows:



Cllr Luke Mallett (Chairman)



Cllr Shirley Webb (Vice Chairman)



Cllr Chris Allen-Jones



Cllr Chris Bloore
(May to Nov 2018)



Cllr Steve Colella



Cllr Richard Deeming



Cllr Malcolm Glass



Cllr Charlie Hotham



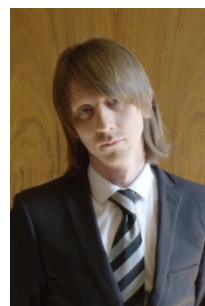
Cllr Rod Laight



Cllr Peter McDonald
(Appointed Nov 2018)



Cllr Philip Thomas



Cllr Michael Thompson

Activities and Outcomes during 2018/19

The Board continues to receive regular updates in order to monitor the progress of recommendations it has made, through the Recommendation Tracker. This contains both recommendations put forward by Task Groups and accepted by the Cabinet, together with recommendations put forward by the Board itself. In respect of Task Groups the Board does, where necessary, receive an update report 12 months following acceptance of its recommendations.

Detailed below are some of the key areas and reports that the Board has considered in this municipal year.

SPORTS HALL OPTIONS APPRAISAL - PRE SCRUTINY

The Sport Hall and former Dolphin Centre are areas which the Board has considered on a number of occasions over recent years. This year the Board considered a report in respect of an Options Appraisal for a Sports Hall, as it had been agreed at Full Council to further consider the provision of a sports hall. Members had requested a report which included number of options. The report detailed the journey that the Council had been on to date, potential timescales for the various options put forward, and the financial, service/operational and legal implications. Members appreciated that this was a matter of great interest to residents and on this occasion the Chairman invited residents in the public gallery to participate in the meeting.

Following lengthy discussions the Board agreed to note the content of the report as it was felt that the decision should be made at full Council.

TRANSPORT PLANNING REVIEW

This was an area which had been well documented and discussed at various meetings over a number of years. It had first been brought to the Board in September 2017, following discussion at a number of Council meetings.

A number of updates were given to the Board throughout the year, in respect of the Transport Planning Review., which looked at the infrastructure issues within the district and the impact of large developments on it. Officers and the relevant portfolio holder from Worcestershire County Council (WCC) attended a number of meetings to respond to questions which had raised and to address Members concerns in respect of the lack of confidence in the work of the Highways Team. A Sub Group was set up to meet key officers from WCC in order to discuss those issues in more detail.

At one of those meetings, Board recommended that the Issues and Options consultation process be suspended pending receipt of further information from WCC in respect of the future plans of the infrastructure for Bromsgrove District. The recommendation was unfortunately, rejected by Cabinet.

The Board finally, considered its draft report on this subject at its April meeting with a number of recommendations being put forward.

AQMA REVOCATION AT HAGLEY (INCLUDING COSTS FOR ADDITIONAL MONITORING AND DATA)

Air Quality Management Areas and Air Quality in general are something which the Board has shown a keen interest over the years. They had carried out task groups in 2007 and again in 2013, so when this report appeared on the Cabinet Work Programme the Board was keen to pre-scrutinise it. This work was carried out in April 2018, and additional information in respect of the types of monitoring and data for the Hagley area was presented to the Board later in the municipal year, with a number of recommendations being put forward at the initial meeting.

ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 204 (IMPLEMENTATION OF PROVISIONS)

The Board pre-scrutinised a report in relation to the Anti-Social Behaviour, Crime and Policing Act 2014, which outlined the implementation of provisions. The report also proposed a series of amendments to the Council's Scheme of Delegations to enable the Council to best utilise and implement the ASB tools and powers under the Act.

It was reported that the Anti-Social Behaviour, Crime and Policing Act 2014 provided the tools and powers, outlined in the report, which were relevant to the Council and supported the Strategic Purpose 'Keep My Place Safe and Looking Good'.

The Board that the Council's Scheme of Delegations be amended to include "in consultation with the Ward Councillor". This recommendation was accepted by Cabinet.

COUNCIL TAX SUPPORT SCHEME REVIEW – PRE SCRUTINY

The Board pre-scrutinised a report in respect of the Local Council Tax Support Scheme (CTS). The report recommended that approval be sought for the Council to undertake a formal consultation with the major preceptors and the proposed revised scheme. Following discussion Members recommended that consideration of the scheme be deferred pending further information. This was largely due to it not being clear in the report who would or would not benefit from the scheme.

The recommendation was agreed by Cabinet and further work on the report was carried out. Members received a further update later in the year in respect of the consultation but unfortunately due to timescale it was difficult for the Board to consider the report in full. It was therefore agreed that on this occasion the Finance and Budget Working Group would carry out the final pre-scrutiny work.

The Finance and Budget Working Group reported back to the main Board that the revised scheme had taken into account all the areas that that Board had discussed and therefore they had been happy to note the report.

WASTE COLLECTION SERVICE

Following a number of issues with waste collection the Board had requested an update on what had led to the problems which had occurred. The Board was informed of the current measures and actions that had been put in place to alleviate any issues in the future. Members were also advised that a number of business cases would be brought forward which would address the areas of concern and the pressure on the service, in the long term.

The Board subsequently pre-scrutinise the business cases in respect of Domestic Waste Collection, Commercial Services and Place Team Resources. These had been produced to show the current pressure on the Environmental Services Team and to consider a number of options to secure the service areas for the future. The Board were encouraged to see that the concerns which had been raised earlier in the year had been addressed through these business cases.

The Board noted the report in respect of these business cases.

CORPORATE PEER CHALLENGE ACTION PLAN

The Board was keen to pre-scrutinise a report which outlined the outcomes and next steps resulting from the Corporate Peer Challenge (CPC) visits which had taken place in January and February 2018. This had been followed up with a written report summarising a number of recommendations to meet the Council needs. These recommendations were designed to complement and add value to the Council's performance and improvement plans.

The Action Plan set out responses to those recommendations together with relevant timescales for completion. The Board recommended that the Constitution Review Working Group carry out a wider review of Council procedures to aid the debating process.

Members received an update at a later meeting and considered the progress made in delivering the recommendations within the Peer Challenge Action Plan. The peer challenge had been an excellent learning opportunity for the Council, providing an external health check of the Council's position.

IN HOUSE MANAGEMENT OF BROMSGROVE MARKET

Following the return of Bromsgrove Market to being managed in house, the Board received a number of updates throughout the year to ensure that this was carried out successfully.

The Portfolio Holder for Economic Development, the Town Centre and Strategic Partnerships provided an update in respect of the Bromsgrove market and were advised of the special events which had taken place in recent weeks and future plans.

The Head of Leisure and Cultural Services advised Members that positive feedback had been received from market traders. It was further advised that a business plan would be devised to review the current market provision as the Council was committed to investing in the Town Centre market. A further update would be provided in the next municipal year.

DEVELOPMENT OF THE BURCOT LANE SITE

The Chief Executive presented the report which provided Members with an update of the current position regarding the site redevelopment and the funding application submitted to Homes England.

The report proposed three options with the preferred option being to establish a housing company to manage the retained housing stock. The proposed plans were discussed at length and the Board recommended that further work be carried out to explore the options available to the housing company to allow it to act as a letting agent; and that the housing company's overarching principle be to provide "affordable" rental accommodation for local people.

SCRUTINY OF THE CRIME AND DISORDER PARTNERSHIP

The Board has a statutory duty to hold at least one meeting a year which covers the scrutiny of the work of the local Crime and Disorder Reduction (CDRP) partnership. In the case of Bromsgrove District Council this is the North Worcestershire Community Safety Partnership.

At its June 2018 meeting the Board was provided with an update on the progress of the North Worcestershire Community Safety Partnership (NWCSP) during 2017/18. A number of key points were highlighted including that:

- Local authorities had a statutory duty to scrutinise the work of the local Community Safety Partnership (CSP) under Section 19 of the Police and Justice Act 2006.
- The NWCSP had a statutory duty to produce a Partnership Plan outlining how it would address key crime and community safety priorities.
- The Police and Crime Commissioner (PCC) had a duty to co-operate with the CSP to reduce crime and disorder and there was a reciprocal duty on the CSP to collaborate with the PCC.
- A new Community Guardians project had been proposed which would create a team of officers to patrol areas of concern in terms of anti-social behaviour.
- The Respect Programme continued to be delivered in schools.

A Youth and Community Hub was being set up in the basement of the Baptist Church in New Road and a project manager appointed. The Hub was officially launched in July 2018.

TASK GROUPS AND SHORT SHARP REVIEW

Task Groups are established by the Board to conduct an in-depth review of any service, policy or issues that affects the District. The Chairman of a Task Group must be a Member of the Board, with the wider membership being any Members who were not Members of the Cabinet. Some of this year's Task Groups have concluded and some remain ongoing. The work carried out by the Task Groups are summarised below. The full outcome of the reviews would be detailed in its final reports.

For those Task Groups which had been completed the final reports are available on the Council's website.

ROAD SAFETY AROUND SCHOOLS

Following a Notice of Motion at Full Council proposed by Councillor P. M. McDonald, this subject was referred to the Overview and Scrutiny Board. Members received an update from the Environmental Services Manager and after a lengthy discussion it was agreed that it was a subject of such important that a Task Group should be established.

The Task Group met on six occasions from February to September 2018, to discuss the matter in more detail. During the course of the investigation, interviews were undertaken with representatives from Parking Services, County Highways, West Mercia Police, the Environmental Services Manager, Deputy Leader and Portfolio Holder for Economic Development, the Town Centre and Strategic Partnerships and Portfolio Holder for Leisure and Cultural Services, Community Safety and Regulatory Services.

The Group reported its conclusions and recommendations to the Overview and Scrutiny Board in September 2018 and resolved to submit the Group's findings to the Cabinet in September, 2018. Cabinet agreed that all of the Group's findings should be considered as part of the Road Safety Review to ensure that the Council provided an efficient and effective Service which was submitted to the Overview and Scrutiny Board and was sent to external agencies, including those who had helped with the report.

The Board received its formal response to the recommendation at its January, 2019 meeting.

Recommendation 1

That the details on the Council's website in respect of Parking Services be located in a more prominent position to encourage residents to report local parking concerns.

Recommendation 2

That Officers from Worcestershire County Council and this Council contact Solihull Council to look at the pilot exclusion zone scheme in order to consider it as an option in some areas within Bromsgrove district and report back any findings to Members.

Recommendation 3

That Officers investigate all options for using of mobile CCTV vehicles in Bromsgrove and report back the findings to Members.

Recommendation 4

That Members are provided with the contact details of the local Safer Neighbourhood Team in order that this information can be shared with residents to enable local issues to be recorded and enforcement action to be prioritised accordingly.

Recommendation 5

That Parking Services and the Safer Neighbourhood Team discuss and jointly prioritise enforcement action.

Recommendation 6

That Worcestershire County Council Highways Team, together with representatives from the Safer Neighbourhood Team and Parking Services come together to discuss a joint campaign to address parking issues around schools and ongoing collective action on this matter

Recommendation 7

The Officers investigate the option to employ an additional Parking Enforcement Officer whose role would be dedicated to looking at road safety around schools.

Recommendations 2 and 6 have been sent to the relevant Officers at Worcestershire County Council, and whilst a response has not been received to date, Officers will continue to chase and monitor this through the Board's Recommendation Tracker, which it receives at regular intervals.

In respect of the other recommendations Members have been advised that discussions are underway with the IT Team to include the contact details for Parking Services on the home page of the Council's website. The Council is working with Wychavon District Council (who facilitate the Parking Services for the Council) to find other authorities who use mobile CCTV and arrange to visit them to discuss how they use the technology and how effective it has been. It is hoped that the results of those visits will be reported back to members Shortly.. Initial joint meetings have been arranged and progress will be reported back to the Board in due course. Again, all the recommendations and their implementation will be monitored through the Recommendation Tracker.

CCTV SHORT, SHARP REVIEW

Following an update to the Board in December, 2016 in respect of the CCTV, a number of concerns were raised by Members in respect of the allocation of CCTV cameras and the allocation of them. The Board suggested that further investigation on this matter was needed to ensure that the service met the needs of residents, that it was fit for purpose and provided value for money. Subsequently, a Short Sharp

Review Group was set up to consider the issue in more detail. This Group met on seven occasions from March 2017 to September 2018 to examine CCTV provision in Bromsgrove District in more detail.

The Board was presented with the findings and recommendations from the Scrutiny Investigation undertaken by the CCTV Short Sharp Review which made a number of recommendations and received its formal response to the recommendation at its January, 2019 meeting. The details of those recommendations are provided below:

Recommendation 1

That the Council's £40k capital funding be used to match-fund a bid to the Police and Crime Commissioner (PCC) for CCTV funding in order to replace the current CCTV transmission infrastructure to a digital network and to purchase and resource the introduction of redeployable cameras.

Recommendation 2

The current camera locations be reviewed in accordance with the Surveillance Camera Commissioners guidance and using data from the Community Safety Partnership, to ensure that they still meet their purpose with cameras to be removed as appropriate; and

Recommendation 3

That Officers' have a rolling programme target to replace the existing cameras over a 3 year period, by replacing approximately 20 cameras per year, subject to a capital bid.

Officers are now working towards ensuring that the recommendations are implemented in a timely manner and the Board will monitor the work that is being carried out through its recommendation tracker.

HOSPITAL CAR PARKING BOARD INVESTIGATION

Following a Notice of Motion at Full Council proposed by Councillor P. M. McDonald, this subject was referred to the Overview and Scrutiny Board. The Board set up a small group of Members to look at this matter, this group held two meetings and a number of issues were discussed with a representative from Worcestershire Acute Hospitals NHS Trust.

The findings and recommendations of the investigation was considered by the Overview and Scrutiny Board and it was proposed that Full Council write to the Secretary of State to suggest that NHS Trust owned hospital car parks should be made free of charge. This was agreed at Full Council with the request that the Leader write to the Secretary of State requesting that car parking at hospitals should be made free.

The Leader wrote to the Secretary of State as requested and reported back the response he had received at the Council meeting held on 23rd January 2019. He had received a reply to his letter from the Heath Minister, which outlined the reasons behind the charges and relevant acts but did not address the affordability question. He had therefore drafted a response:

“Thank you for your letter dated 14th December in response to the issues I raised regarding the cost of hospital car parking at Worcestershire Acute Hospital NHS Trust.

Whilst I note the explanation you have provided, the Overview and Scrutiny Task Group on hospital Car Parking Fees carried out its investigation one of the main findings was around affordability in light of the high level of fees charged. I can only re-iterate on behalf of the Council that the problems with affordability of hospital car parking charges represent a genuine source of concern for our local residents. I understand that this is a concern that affects many other areas of the country and it is disappointing that the current guidance has not been updated since 2015.

Accordingly, I would ask again that this issue be considered, and that an urgent review is undertaken of the current guidance with a view to either eliminating, or significantly reducing the level of charges for hospital car parking.”

The Leader advised that he intended to dispatch the letter by the end of the week and would be sending a copy to the Council’s MP.

A further update was given at Council on 27th March 2019 when the Leader advised that he had received a further response from the Department of Health and Social Care in respect of hospital car parking:

“We have made it very clear that patients, their families and our hardworking staff should not be subjected to unfair parking charges. NHS Trusts are responsible for these charges and ensuring revenue goes back into frontline services and we want to see Trusts coming up with options that put staff, patients and their families first.

While we expect all NHS organisations to follow the published NHS Car Parking Principles, they have the freedom to make decisions on their car parking, including charges to reflect their local situation. If any excess is generated, income generation rules require that it is used to fund clinical services.”

The Leader confirmed that he would not let the matter drop and would continue to lobby for the removal of car parking charges at hospitals.

BUSINESS RATES RELIEF SHORT SHARP REVIEW

The Business Rates Relief Short Sharp Review has met twice and Members have agreed a work programme going forward, having identified a number of key witnesses to interview.

BROMSGROVE SPORTING TASK GROUP

Members agreed to launch a Task Group to review the work of Bromsgrove Sporting Football Club and Membership of that Task Group has been confirmed. To date however, an initial meeting has not been arranged.

WORKING GROUPS

FINANCE AND BUDGET WORKING GROUP

This Group has met on nine occasions this year and were particularly active in the weeks leading up to the budget setting. The Portfolio Holder for Finance has attended the majority of meetings, together with the Executive director, Finance and Resources. On occasions Heads of Service have been invited in to provide information on a variety of reports covering their areas. For the first time this year a meeting was set aside in respect of Fees and Charges to which all Heads of Service and relevant Portfolio Holders were invited.

For the first time this year the Working Group have been able to pre-scrutinise many reports at a very early stage, so rather than put forward recommendations, in some cases the Portfolio Holder took on board the views of the Working Group and these were fed directly into the final reports which were published.

To give an idea of the work that has been carried out, the list below contains some of the reports which the Working Group has considered:

- Medium Term Financial Plan and Quarterly Monitoring Reports
- Year End Financial Outturn – Capital and Revenue, and Reserves
- Overarching Budget Framework (this included Cost Recovery and Outturn –v- Budget)
- Capital and Revenue Programmes
- Treasury Management and Capital Strategy
- Investment and Acquisition Strategy
- Finance System

Once again by being able to consider a number of reports in more detail and prior to their consideration at Cabinet has allowed Members of the Board via the Working Group to play an integral part in the budget setting process.

CORPORATE PERFORMANCE WORKING GROUP (formerly Measures Dashboard Working Group)

This Group has met on six occasions this year, with a major changing taking place at the beginning of the new municipal year, when it was decided that the name of the Working Group would change and the terms of reference would be updated to reflect the work which was being carried out. This showed that the Working Group had made good progress from its initial slow start and had progressed from simply checking the data on the Corporate Dashboard to taking a more strategic approach and questioning the relevant Heads of Services and looking at particular areas in more detail. This was highlighted from the work carried out in respect of the Domestic Waste Service when the Working Group met with the Head of Environmental Services and the Environmental Service Manager following issues with waste collection during September 2018.

Agenda Item 7

The Group have dedicated each meeting to looking at the relevant measures for each of the Council's strategic purposes and where necessary have suggested changes or amendments to the ways in which delivery of that service is being measured. As with the Finance and Budget Working Group, this shows a direct link with Officers and Portfolio Holders has been established in supporting the work carried out and helping to ensure that the performance of services is measured in a useful and constructive manner.

EXTERNAL SCRUTINY

Worcestershire Health Overview and Scrutiny Committee (HOSC)

The Board receives regular updates from Councillor Bloore, the Council's representative on the Worcestershire Health Overview and Scrutiny Committee. The updates provide the Committee with information on any strategic health issues and the Board are able to feedback to HOSC through Councillor Bloore any concerns they have about particular areas.

Some of the issues highlighted during the year included:

- Winter pressures on hospitals and patient flow in and out of hospital.
- Ambulance divert pilot.
- The role of HOSC, its effectiveness and its terms of reference

Further details are available at the Worcestershire County Council website.

Future Plans 2019/20

At the last meeting of the municipal year Members reviewed the work that it had carried out and considered any future plans. As it was likely that there would be a number of changes to the Board membership following the Elections to be held in May 2019, Members concentrated on the training and work programme planning event which was historically held prior to the first meeting of the Board in the new Municipal Year. Those discussions covered a number of areas including the need to emphasis to any new Members the importance of cross party working and that the Board and its work was non-political. The need for commitment and regular attendance at meetings should also be highlighted to new Members and they should be encouraged to join in with the Working Groups and any Task Groups in the future.

Members also felt that, any returning Members to the Board should help to facilitate the training sessions as they would be able to give a better view of what the Board was like from a Member perspective and how best to make it work and develop in the future. The work of Overview and Scrutiny now more than ever, was an important role to play in ensuring the work of the Council met the needs of its residents, whilst providing value for money.

APPENDIX A

OVERVIEW & SCRUTINY TOPIC PROPOSAL

This form can be used for either a Task Group or a Short Sharp Review topic proposal.

Completed forms should be returned to scrutiny@bromsgrove.gov.uk – Democratic Services, Bromsgrove District Council.

Name of Proposer:	
Tel No:	Email
Date:	

Title of Proposed Topic (including specific subject areas to be investigate)				
Background to the Proposal (Including reasons why this topic should be investigated and evidence to support the need for the investigation.)				
Links to national, regional and local priorities (including the Council's strategic purposes)				
Possible Key Objectives (these should be SMART – specific, measurable, achievable, relevant and timely)				
Anticipated Timescale for completion of the work				
Would it be appropriate to hold a Short Sharp Inquiry or a Task Group? (please tick relevant box)	Task Group		Short Sharp Inquiry	

OFFICE USE ONLY - TO BE COMPLETED WHEN THE TOPIC PROPOSAL IS ACCEPTED

Evidence	
Key documents, data, reports	
Possible Site Visits	
Is a general press release required asking for general comments/suggestions from the public?	
Is a period of public consultation required?	
Witnesses	
Officers	
Councillors (including Portfolio Holder)	
Any External Witnesses	

The Chairman of Overview and Scrutiny Board express his thanks to all Members of the Overview and Scrutiny Board, recognising in particular the valuable contribution made by Members through Task Group investigations and Short Sharp Reviews.

For any background information on the work of Overview and Scrutiny Committee in Bromsgrove, please visit <https://www.bromsgrove.gov.uk/council/the-council.aspx>

Democratic Services, Bromsgrove District Council, Market Street, Bromsgrove, Worcestershire, B61 8DA
Tel: 01527 881443 email: scrutiny@bromsgrovedc.gov.uk

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Bromsgrove District Council



Audit, Standards and
Governance Committee

ANNUAL REPORT

2018 / 2019



Bromsgrove
District Council

www.bromsgrove.gov.uk

FOREWORD

I am pleased to present the Audit, Standards and Governance Committee's 2018/19 Annual Report. It records the continued progress the Council has made in providing a thorough, independent assessment of the wide range of controls and corporate governance.

This report reflects the wide work programme incorporated within this committee's work and clearly shows that the Council's business is compliant and transparent. The report demonstrates the value to the Council and the public in ensuring that improvements to the governance of the Council are being delivered.

The assessment of the 2018/19 report is described as "xxxx for VFM and xxxxxx". This is pleasing in that it maintains the excellent progress made over recent years and affirms a strong base position to take the Council forward over the coming years.

I would like to thank the 151 Officer, Monitoring Officer, Democratic Services and members of the committee for their continued support over the last year and for the continued progress being made. As chairman I believe that the Audit, Standards and Governance Committee provide a valuable contribution to the development of standards and protocols across the Council's governance in an effective and compliant way.

Councillor Steve Colella
Chairman

MEMBERSHIP



Steve Colella (Chairman)



Mike Webb (Vice Chairman)



Chris Allen-Jones



Chris Bloore
(From Jan 19)



Helen Jones



Rod Laight



Peter McDonald
(From June 18 to Jan 19)



Stephen Peters



Phil Thomas



Michael Thompson

INTRODUCTION

This report provides an overview of the Audit, Standards and Governance Committee's activities during the municipal year 2018/19.

The ultimate responsibility for Audit rests with the Portfolio Holder with responsibility for Finance and the Section 151 Officer. The Portfolio Holder is expected to attend each meeting in line with the Constitution.

During the year the Committee has considered reports on the following subjects:

- Monitoring Officers Report – which details complaints and training which has taken place during the period between meetings.
- Dispensation Reports
- Updates from the external auditors, Grant Thornton in respect of their work.
- Updates on the work of the Internal Audit Team.
- Section 11 Plan Monitoring.
- Quarterly Financial Savings Monitoring Update Reports.
- Corporate Risk Register
- The Risk Champion's Update Report.
- Statement of Accounts.
- Benefits and Compliance Annual Update report 2017/18

Further information about some of the key responsibilities of the Committee are outlined in detail within this report.

THE ROLE OF THE AUDIT, STANDARDS AND GOVERNANCE COMMITTEE

Scope and Responsibility

The Audit, Standards and Governance Committee provides independent assurance to the Council in respect of:

- The effectiveness of the Council's governance arrangements
- The Annual Governance Statement
- The Review of the Annual Statement of Accounts
- Risk Management Framework and strategies
- The effectiveness of the Council's financial and non-financial performance
- Anti-Fraud arrangements
- Whistle-blowing strategies
- Internal and external audit activity
- Democratic governance

The Committee is also responsible for the Council's Standards Regime which covers both District and Parish Councils. Areas encompassed within the Standards Regime include:

- Promoting High Standards of Conduct by Councillors and co-opted members of Council bodies.
- Assisting Councillors and co-opted members to observe the Members' Code of Conduct.
- Advising and training Members and co-opted members in respect of the Code of Conduct.
- Formulating advice to members and officers in declarations of gifts and hospitality.
- Granting dispensations to Councillors and co-opted members from requirements relating to interests as set out in the Code of Conduct.
- Considering reports from the Monitoring Officer following investigation into a complaint about elected Members.

Meetings of the Board

The Council's constitution requires the Audit, Standards and Governance Committee to hold quarterly meetings. During the municipal year 2018/19 meetings were held in July and October 2018 and January and March 2019. The Audit, Standards and Governance Committee work programme was reviewed at each meeting with items included as and when considered and agreed by the Committee.

STANDARDS REGIME

There are two main areas which are considered regularly in terms of the Committee's responsibility for Standards.

Monitoring Officer's Report

This covers Member Training, Member Complaints and Parish Council matters.

Dispensation Report

At the start of the year the Committee granted a number of Members' dispensations to discuss matters in which they had an interest.

Parish Council Involvement

The Parish Council representative is able to add any item on to the agenda as required and this is highlighted within the Monitoring Officer's Report.

Investigations and enquiries

This year there has been one formal complaint (member to member District) and that the complaint had been resolved locally between the two group leaders. There have been no investigations about Members which required a Hearings Sub-Committee to be convened.

INTERNAL AUDIT REPORT

During the year the Committee has continued to receive updates on the work of the Internal Audit team including details of the following completed audit reports:

- Internal Audit Annual Report and Draft Audit Opinion 2017/18
- Internal Audit External Assessment 2017/18 Progress Report
- Internal Audit Monitoring Report
- Internal Audit - Progress Report
- Internal Audit Charter
- Internal Audit – Progress Report
- Internal Audit – Draft Audit Plan 2019/20

EXTERNAL AUDITORS

During the year the Committee received reports from the current External Auditors, Grant Thornton on the following subjects:

- External Audit Finding Report
- External Audit Opinion 2017/18
- Audit Fee Letter 2018/19
- Sector Update
- Communicating with Audit, Standards and Governance Committee
- External Audit Plan
- Housing Benefit 2017/18 Certification Letter

The Progress Reports were considered at each meeting of the Committee and covered a range of issues including the following:

- Value for money
- Significant Risks
- The Changing Face of Corporate Reporting
- Financial Statements
- Housing Benefits

STATEMENT OF ACCOUNTS

The Audit, Standards and Governance Committee, considered the Statement of Accounts at the meeting in July 2018.

This was the third year that the Committee had considered the Audit Findings and Statement of Accounts. It was noted that the Statement of Accounts was approved by 30th May 2018 and submitted to Grant Thornton. This met the new statutory date of 31st May for accounts to be submitted. The Statement of Accounts has to be audited and approved by 31st July 2018 which is two months early than in previous years to meet the revised statutory timeline.

It was recommended that Council approve the Statement of Account for 2017/18, including the Accounting Policies provided in the report. Included within the Statement of Accounts there were a number of core financial statements that provide a summary of the financial position of the Council.

The external auditors issued an unqualified judgement on the accuracy of the accounts for 2017/18. Grant Thornton was satisfied that, on the basis of materiality, the Council's accounts were accurate

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CABINET RECOMMENDATIONS TO THE COUNCIL

On 26th June 2019

Cabinet meeting 10th April 2019

Response of BDC on Solihull Draft Local Plan Supplementary Consultation

Members considered the report in respect of the Solihull Draft Local Plan Supplementary consultation report.

RECOMMENDED TO COUNCIL

that the officer response to the Solihull Local Plan Review supplementary consultation, be approved by Council as its formal response, and that it is confirmed with SMBC as such.

Cabinet meeting 12th June 2019

High Quality Design Supplementary Planning Document

Members considered the report in respect of the High Quality Design Supplementary Planning Document.

RECOMMENDED TO COUNCIL

that the revised version of the High Quality Design SPD be adopted.

Statements of Common Ground and the Plan Making Process

Members considered the report in respect of the Statement of Common Ground (SoCG) and the Plan Making Process.

RECOMMENDED

that all SoCG which include agreements on cross boundary housing, employment or other development needs or any other key planning issue are reported to council for consideration prior to signing.

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OVERVIEW & SCRUTINY BOARD INVESTIGATION

TRANSPORT PLANNING REVIEW FINAL REPORT

February 2019



Bromsgrove
District Council
www.bromsgrove.gov.uk

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Summary of Recommendations

After consideration of the evidence available and interviewing witnesses the Overview and Scrutiny Board has proposed the following recommendations, supporting evidence can be found within the main body of this report.

Recommendation 1

- a) That Worcestershire County Council's Highways Team consult with the relevant County Councillor, when consulted in respect of any planning applications. This should be done as a matter of course, as they may have more detailed local knowledge of a particular area.
- b) BDC Members will continue to receive the weekly list of all planning applications.

Recommendation 2

That as part of the response to a planning application the Worcestershire County Council's Highways Team should include a full breakdown of the costs of any infrastructure work which needs to be carried out and provide details of how this work would be funded.

Recommendation 3

That it is recognised that the relationships between Worcestershire County Council and this Council and its parish councils and residents has not been positive and that although the journey to improvement has begun, the improvements to the culture and ways of working need to be ongoing to ensure that the improvements continue.

Recommendation 4

That Worcestershire County Highways Team recognises that there is no "one size fits all" approach. They should remain open minded and flexible in considering the approach to the analysis of planning applications before reaching any conclusions.

Recommendation 5

At the earliest possible stage of the Strategic Transport Assessment the Project Officers from Worcestershire County Council and this Council arrange a briefing for Members in order to provide details of the scope of the Strategic Transport Assessment, the process and relevant timelines.

Recommendation 6

That this Council is fully represented on the Project Team of the Strategic Transport Assessment to be undertaken, by both officer and Member representation.

Recommendation 7

That, throughout the process of the Strategic Transport Assessment, the Strategic Planning Steering Group holds regular meetings dedicated to this with representatives of Worcestershire County Council in attendance, in order to provide updates and listen and taken on board the views of this Council's Members.

Recommendation 8

That the Overview and Scrutiny Board recognises the current need for the additional transport support from Mott MacDonald. However it requests that the Leader and Cabinet make every effort to seek re-imburement of those costs from Worcestershire County Council.

Recommendation 9

That the Overview and Scrutiny Board formally writes to the Chairman of the Worcestershire Overview and Scrutiny Performance Board requesting that the report be included on its agenda for future consideration to ensure that Members and Officers at Worcestershire County Council are aware of the issues and concerns of this Council.

Background Information

The need for a review of the infrastructure in the Bromsgrove District has been something which has been discussed at length over a number of years at various levels. The frustrations of both Members and residents, in a number of areas in particular, have also been well documented.

The most recent discussions, which have culminated in this report being commissioned, arose from a number of Council meetings, the first on 26th April 2017 when the Council debated the Council's response to the Worcestershire County Council's Local Transport Plan 4 (LTP4) consultation. Further issues were raised and discussed in detail when the minutes of this meeting were received at the Council meeting on 21st June 2017. At this meeting, it was agreed that Mott MacDonald or a similar organisation would be appointed to undertake independent traffic data monitoring. A notice of motion was then submitted at the Council meeting held on 20th September, which was withdrawn at the meeting, following agreement that a full report would be brought forward to the Council meeting in November 2017 for discussion.

A full timeline summarising when relevant matters have been discussed at various meetings is attached at appendix 1.

It had initially been agreed at the Council meeting held on 20th September 2017 that a report would be presented to full Council in respect of a number of the issues raised in relation to infrastructure within the District and the work of Worcestershire County Council Highways (WCC). However, it was subsequently agreed by the Group Leaders that it would be more appropriate for the Overview and Scrutiny Board to consider the matter. At the Overview and Scrutiny Board meeting held on 27th November 2017 a briefing paper was tabled, which contained details of the areas to be covered by that report. On consideration of that paper, the Board did not believe it went far enough in addressing all the issues which had been raised over recent months. Particular reference was made to the work which had been carried out by Mott MacDonald and the analysis of traffic counts and the Barham model, together with a response from WCC on the points which had been tabled at a previous Council meeting. Following lengthy discussion the Board agreed that what was proposed to be in the report was not sufficient and did not respond to all the questions raised by Members. It was therefore agreed that the matter be included on the Overview and Scrutiny Board's work programme with all relevant stakeholders invited to attend a future meeting in order to give them the opportunity to respond to the questions raised.

The following chapters of this report will provide information on the investigation which was carried out by the Overview and Scrutiny Board, together with a chapter in respect of Lessons Learnt and finally a Chapter on Going Forward and doing things differently, together with how this could be achieved.

Chapter 1

The Investigation

As highlighted in the background information provided it is clear that this subject has been both well documented and discussed at length on many occasions. This Chapter will therefore concentrate on discussions held at four key meetings, three public meetings of the Overview and Scrutiny Board held on 27th November 2017, 15th January 2018 and 24th May 2018 and a fourth meeting held in private on 23rd October 2018. The purpose of the private meeting was to enable a more open and honest discussion between a small group of Members from the Overview and Scrutiny Board supported by the Strategic Planning and Conservation Manager and officers from WCC, with the hope that the matter could be brought to a satisfactory conclusion for all concerned.

27th November 2017

At this meeting, under the Work Programme item, Members considered a briefing note from the Strategic Planning and Conservation Manager which summarised the general position in relation to the work of the consultants providing transport planning advice to the Council, following the resolutions made at the Council meetings in April and June 2017. It responded to concerns raised by Members at the September 2017 Council meeting and highlighted the way forward to ensure current planning applications could be considered by the Planning Committee and the ongoing strategic work which would require further resourcing. It was agreed that any report would, in the first instance be considered by the Board prior to its consideration at Council.

Whilst it was anticipated that the initial report would come forward to the December meeting, the Chairman and Members were concerned that it would not address all the issues which had been raised over a number of months. The aim of the meeting therefore had been to ensure that all areas discussed would be included and if it was felt necessary, the timescale would be extended to ensure that happened.

The minutes from the Council meeting on 20th September 2017 provided a detailed record of those areas discussed. This included the data which had been gathered in previous months, the importance of the relevant officers from WCC being present at any future meeting where these matters were discussed in order to give them an opportunity to put forward any response. The release of the data sets was also discussed and it was questioned why WCC were unwilling to share this information even through a Freedom of Information application had been made.

Members highlighted that it was important that consideration be given to the future needs of Bromsgrove in the form of forward planning and ensuring that not only the current data was accurate but ensuring that modelling was

carried out in order to see what the position would look like as far ahead as 2030 due to the impact of future developments and projections.

The main areas of concern were the need for an explanation and acknowledgement from WCC and its officers as to why the previous model assumptions appeared to be inaccurate and the impact that this had had on the Council and its residents. It was also felt important that any report produced should enable both Members and residents to understand the position and have confidence that the information being provided within it was correct.

In total there was over twenty bullet points highlighting areas of concern from Members, which it was felt needed to be addressed and included within any report. It was therefore concluded that before this process could move forward a meeting needed to be held with all relevant parties present in order to respond to those points and any further questions which arose from that meeting. However, whilst in agreement with this, Members were keen to ensure that the investigation was treated separately from the planning application process and that it did not prevent work being carried out on any planning applications coming forward or the Planning Committee decision making process. It was understood that the work commissioned by Mott MacDonald would mitigate this to an extent, however it was noted that there were financial implications for the Council by commissioning this work and at this early stage Members were already questioning whether it was appropriate to seek compensation of some sort from WCC in respect of those costs.

15th January 2018

Officers from this Council arranged for key officers from WCC to attend this meeting. They had been provided with a copy of the relevant minutes from previous meetings in order to give them an overview of the areas which would be covered and the questions they would be asked at this meeting.

Following introductions and WCC officers giving a steer as to what they saw as their role within the process (it was stated that they had already provided the Strategic Planning and Conservation Manager with information for his report and if further information was requested then discussions would take place to assist with the report). It was agreed that the best way forward was to take each bullet point from the previous meeting and allow WCC officers an opportunity to respond.

The first initial part of the meeting concentrated on the data sets, their release and explanations as to why these had been withheld. It was explained that as there were a number of applications still in progress they had not, on legal advice at WCC, been able to release that data. However, following further discussions they had been informed that this was now possible and were happy to share this information outside of the meeting. The traffic count data, which had been gathered in previous months, was also highlighted, as Members had raised concerns, as this had been different to that expected, in fact some had been expected to show a reduction in traffic numbers when in

fact they had shown an increase. With this much variance Members again raised concerns around how this would impact on data for future years when the revised assumptions fed into the planning process. WCC officers explained that the data was merely a snapshot and not used to forecast future needs. This was done by using national data and recognised modelling in respect of traffic growth, together with a significant amount of detailed analysis. It was further explained that there was a high cost to such modelling and currently there was a limited number of areas which were undergoing such work.

Members continued to questions WCC officers in respect of the data and modelling used and it was noted that in some cases this had been out by as much as 8%. The continued concern was what the impact of such varying data would be on future modelling. WCC officers responded that they were aware of the lack of confidence from the Bromsgrove Members and that they hoped this and future meetings could address some of the concerns and help to restore that confidence.

Members went on to question WCC officers in respect of both the use of BaRHAM and its cost to WCC. WCC officers advised that this model had been built for one particular case, but had begun to be used for areas outside of its original purpose and was subsequently withdrawn, the consultants who had built it had accepted that the cost to WCC was zero.

Following discussions around the general data and modelling, Members went on to discuss the impact on a number of recent developments in Hagley and whether the data used had been accurate and whether the appropriate infrastructure had been put in place to mitigate the growth. Members were led to believe that funds available to WCC had been spent elsewhere within the County but that Bromsgrove had not benefitted from these. WCC officers confirmed that a number of the points raised would be addressed again and that it was important that everyone looked very hard at future growth and forthcoming big issues around existing growth to ensure that the right plans were put in place to address these and to ensure that the Council got as much benefit as possible from the highways and other infrastructure strategy.

This led on to discussions around clarification of the budget that WCC held and the practicalities around its distribution. It was questioned how the existing budget was allocated across the County and that some areas appeared to receive a disproportionate amount of funding compared to others.

The Head of Planning and Regeneration also commented on the discussions and made particular reference to confirmation by WCC that the BaRHAM model was not fit for purpose. She also commented that she took comfort from the data provided by Mott MacDonald for a number of planning applications moving forward. Once again, the cost of this was raised by Members and the possibility of recouping some, if not all of this, from WCC. She also made a number of interesting points, which resonated with Members, in particular she reiterated the lack of confidence in WCC Highways and the importance of the developers being aware of the new dimension to

working together to ensure that lack of confidence was repaired and she stressed the need for WCC to work collaboratively with this Council to ensure that transport issues were identified and considered fully so that going forward the appropriate sites for development were identified.

Members also discussed Air Quality in a number of areas, together with the Air Quality Management Areas which were already in place within the District. Worcestershire Regulatory Services officers were in attendance and discussed how unacceptable levels of pollutants could be addressed and the impact on the health of residents. The types of monitoring were also discussed and the levels set nationally, together with long term health implications and the Council's legal duty to reduce emissions. This is an area which the Board has taken an interest in previously, with a Task Group being established in 2012 and a detailed report going to Cabinet in September 2013. The Board has always shown a keen interest in ensuring that the appropriate monitoring is carried out and have pre-scrutinised a number of reports on the subject over recent years.

At the end of the meeting a summary of the main areas covered and actions arising were given to ensure it was clear as to what was expected from WCC officers at the next stage of the investigation.

24th May 2018

Members had continued to receive verbal updates at previous meetings and had been advised that the delay in receiving the final report had been due to the lack of appropriate responses to the points raised by Members, being provided to the Council's officers by WCC officers.

The Chairman advised Members that the matter had been discussed at WCC and as a result it had been agreed that WCC officers and Councillor K. Pollock, the Cabinet Member for Economy and Infrastructure should attend the meeting. There was also a report presented to the Board which had been produced by the Council's retained highways consultants, Mott MacDonald. This report had been produced in response to a request from the Board to examine the study undertaken by JMP who were commissioned by WCC to examine the need for a Western Distributor/Bypass. It was noted that Councillor Pollock had not agreed with the conclusions in the Mott MacDonald report. It was confirmed that the JMP report had been funded by WCC and was not connected to any developers.

Concerns which had been raised as far back as 2016 were referred to and showed that there had been a consistent view that the review had been flawed as it had not taken the right approach or used the correct methodology and this document had been relied on to make decisions. In particular reference was made to the Council District Plan and it was clarified that this had been adopted and the key therefore was to ensure that the appropriate highways mitigation was in place and it was therefore important to thoroughly understand the infrastructure as part of that work.

Reference was made to a scenario where a new development had been agreed despite public concerns about the impact of it on local roads and infrastructure. In that case the WCC Highways had accepted, without question, the views of the consultants who, it was understood, had been paid for by the developer, to consider the mitigation required. It was confirmed that the Mott MacDonald report had not been shared with JMP although it was suggested that it would be useful if it was and they be asked for their views on it.

Councillor Pollock had expressed sympathy for the local District Councillors and residents who experienced traffic issues on a daily basis. He referred to a number of projects, including the Highways England M5 Motorway project at junctions 1 and 2 and that there had been little regard for the impact on the local areas when traffic had been diverted off the motorway.

It was suggested by the Portfolio Holder for Planning Services and Strategic Housing that the Mott MacDonald report be sent back to JMP and that they be asked to rectify the report that they had produced and consider if the information within it was correct or not or alternatively it was suggested that JMP be asked to put together a new report responding to the questions raised.

Concerns were raised by the Head of Planning and Regeneration that the report requested by the Board was more of a highways engineer role and therefore suggested that it may be more appropriate for that report to take a more holistic approach as opposed to getting entrenched in the detail of particular areas and problems.

23rd October 2018

Following the various discussions and the delays in getting information from WCC it was decided that a small group of Members of the Overview and Scrutiny Board (Councillors S. Colella, P. Thomas and S. Webb) and chaired by the Overview and Scrutiny Board Chairman (Councillor L. Mallett), together with the Strategic Planning and Conservation Manager would arrange to meet with WCC officers to try to bring this matter to a satisfactory conclusion for all concerned.

This meeting was planned for 23rd October and at the beginning of it the Chairman highlighted three key areas which he felt should be covered by the report, which are the areas detailed in chapters 2 and 3 of this report.

Frank and open discussions were held at this meeting and the Strategic Planning and Conservation Manager questioned whether there was any value in looking back over the previous minutes and concerns raised by Members as these had been so well documented and he felt it may now be more useful to look forward and find ways in which to address the issues raised and ensure that they were not repeated. However, Members were of the view that in order to move forward it was important to understand the historic part of the process and why issues that had built up over time had resulted in the

Council's current position. This would then allow the Council, its officers and Members to move forward and ensure that similar mistakes were not made in the future. Members were of the view that it was important to recognise the danger of history repeating itself. It was however acknowledged that there may be some questions that were not able to be answered.

Members went on to discuss case studies which validated the use of Mott MacDonald "checking" the work of the Highways team and it was agreed that that fed into some of the questions which had previously been put forward and was there as a supporting challenge. It also provided Members with the confidence to make the right decisions with future planning applications, knowing that this work had been carried out. This again brought Members back to the discussion around the ongoing cost of Mott MacDonald's work and the long term financial impact to the Council and whether this cost should be reimbursed by WCC.

Members also discussed with the WCC officers both the data and modelling used, in particular the traffic surveys undertaken in May/June 2018 and how the information was gathered. The methodology used by WCC was also discussed in detail and again the accuracy of the data which was produced from it. Particular sites in some Wards were discussed and it was questioned as to why data collected by a developer was not checked and verified before being used in the decision making process.

Problems arising from developments which were in addition to those initially identified were also discussed and it was highlighted that these would not be included in the original plans. This showed that developers did not look at the wider picture, but just at the initial impact from their development. Whilst it was suggested that it would not be in the developers' interest to do this, it was something which needed to be looked at more closely to get a true picture of the impact of any development.

WCC Officers confirmed to Members that the developers put forward their proposals and the WCC responded to what had been provided. It was not for WCC to question what had been put before then. However, if there was any particular concern arising from the proposals then they would pass the information to an independent consultant and challenge its content. Members suggested that WCC officers needed to be flexible in their approach and ways of working to ensure the right decisions were being made.

One of the most important areas discussed was the use of local knowledge. It was noted that WCC officer on occasion contacted the County Councillor for a particular area and it was suggested that whilst this was useful, that the Ward Councillor would have much more detailed knowledge of an area which could prove invaluable to officers. This would also allow for concerns to be raised formally at an early stage and would show Members that their view was being taken seriously.

Members continued to reiterate that their concern was the understanding (or lack) of the base situation in Bromsgrove and lack of confidence in the various

models used, which had been confirmed by these being found to be not fit for purpose. There were very specific underlying problems in Bromsgrove, not just the number of vehicles or growth, but roads and junctions which were already at capacity and this was “growth” above and beyond that expected and led by the motorway network and commuter traffic. The set of circumstances were so unusual that they made the current infrastructure unbearable. It was further questioned as to whether WCC corporately were taking responsibility for mistakes which had been made both in the recent past and historically, which had had a detrimental impact on Bromsgrove District.

Further discussions took place around the delivery of the infrastructure in certain areas and the ways in which it could be funded. Members discussed SIL and IDP payments and the consequences should contributions not be in place. It was suggested that developments should not be moved forward if they did not have details of how the infrastructure would be funded included within them. Whilst it was understood that WCC would try to get as much of the funding as possible from the developer the concern was that if WCC did not have the funds to complete the work needed then it would not be carried out. Members further questioned how WCC could agree to a development when they were aware that the developer contribution would not be sufficient to fully fund the infrastructure needed and they themselves did not have the funds available to cover the balance.

Members went on to suggest that as part of the planning applications, where the Highways Team was consulted, a breakdown should be included of where the money for covering the work needed would come from and should clearly state how the gap would be met. Members believed that it was important for this to be included as it would give them the confidence that not only was it recognised that the work needed to be carried out but that there was a commitment to make it happen. This could also be used as the beginning of a tracking process that once the development was completed, that the necessary work had been carried out, as Members believed that there should be a clear audit trail which showed that this had been followed through.

WCC officers stressed their concern that the Council’s confidence remained very low and they hoped to be able to work with officers and Members to repair the damage which had been done.

Chapter 2

Lessons Learnt

Chapters 2 and 3 of this report can be broken down into four specific areas for discussion:

- Questions and answers to those questions
- Lessons learnt
- Confidence going forwards including doing things differently to achieve that.
- Future priorities and the plan making process.

Whilst future priorities and the plan making process have been dealt with separately and in more detail, under Chapter 3, confidence going forwards is also touched upon within this Chapter and is an area which Members have come back to on numerous occasions. The ongoing lack of confidence felt towards WCC has been highlighted by the continued use of Mott MacDonald and the need of the Council to seek that support to enable them to continue carrying out its every day duties as the planning authority.

It is acknowledged that there have been issues to tackle over recent years; it is considered that ensuring a new way of working going forward is the key element to focus on and not forensic investigations into the past.

As highlighted in the previous chapter at a number of Overview and Scrutiny Board meetings specific questions have been posed by Members, the questions and where possible the answers were eventually responded to formally by WCC in a document, Formal Response to BDC – Overview and Scrutiny Committee dated July 2018. It should be noted that's some of the questions posed are not questions that can be answered. Notwithstanding this Members were in many cases disappointed with the responses received and have continued to press for more detailed and appropriate answers to the questions they have raised, together with an acknowledgment from WCC that they were to blame for some of the mistakes that had clearly been made.

From the Council's perspective a key lesson to be learnt is the level of evidence and analysis that can be generated when considering the provision of transport infrastructure.

WCC have accepted that there were issues with some of the work that has been undertaken by them in recent years, particularly around the input into the previous Whitford Road application and subsequent appeal inquiry, and the commissioning and production of the BaRHAM model. This acceptance was welcomed and it is hoped that WCCs commitment to the processes outlined below will ensure that Member confidence can be restored in the work undertaken by WCC Highways.

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Although engagement does take place at the moment, WCC officers have committed to higher levels of engagement with both BDC Members and officers to ensure that confidence can be restored.

A number of previous reports have been produced and circulated which review work undertaken by WCC or their consultants, such as BaRHAM and the Western Distributer feasibility assessment; these have been listed in the background papers section of this report.

Chapter 3

Going Forward, Future Priorities and the Plan Making Process (doing things differently)

The Board acknowledges that there is a need to move forward and for the confidence in Worcestershire County Council (WCC) to be rebuilt and restored. The previous chapter it was discussed how lessons can and must be learnt from the mistakes made and the need for this to be acknowledged by WCC. It is also important for them to assist in the process of rebuilding that confidence in order for both Councils to be able to work together in the future.

From the information that the Board has received it believes that the future priorities can be broken down into two specific areas

- Progressing planning applications
- Strategic Transport Assessment

The progression of the current large scale planning applications needs to remain a focus. These allocations are contained within the Bromsgrove District Plan (BDP) which remains sound only relatively recently being adopted in January 2017. The detailed work which is currently being progressed to provide the technical solutions to allow for these schemes to come forward needs to continue. This work is being done to satisfy the policies contained within the BDP. It is envisaged that Mott MacDonald will continue their role in advising the Council on this over the coming months.

Strategic Transport Assessment

Members will be aware of the recent consultation on the Issues and Options for the Bromsgrove District Plan review. Within that documentation sections were included on:

- Growing the economy and the provision of strategic infrastructure
- Transport

These sections begin to set the scene for what challenges need to be overcome as the plan review progresses. The responses to the issues and options consultation are still being assessed and will be reported back to Members in due course through the Strategic Planning Steering Group. These sections of the issues and options contain questions which will provide the Council with some evidence on what and where there are issues with transport across the District. The key here is evidence, and this is what the Strategic Transport Assessment (STA) will provide.

Discussions have and continue to take place between this Council and WCC about the scope and content of an STA. Officers and Members at both

organisations have committed to producing an STA which will directly inform the content of the Bromsgrove District Plan review as the plan progresses.

What is an STA?

An STA is recommended by the Planning Practice Guidance (PPG) as a tool to inform the plan making process. The PPG provides some detail on what a STA should contain but, it is not prescriptive on the exact details and approach, therefore it is important that the approach taken is robust and comprehensive.

The Board are advised that the discussions to date have been positive and agreement has been reached on exploring a three stage approach to the STA which is outlined below. It must be stressed though that this approach could change in response to the evidence available and the requirements of the plan making process. Those three stages are detailed below.

Historically planning authorities have provided WCC with development sites; they have then been assessed and information provided on what infrastructure is required to enable the site, this is the “predict and provide” approach. This approach, although not necessarily the wrong approach, has not worked particularly successfully in Bromsgrove due to the complexity of the transport network.

The iterative evidence based approach which is now being progressed will allow for a much more robust analysis of site options which can be tested against current and future transport conditions.

1: Establish baseline position

The first step is establishing a baseline i.e. a factual position of how the transport network operates, it is then possible to quantify the current issues, and then in turn quantify impacts of development more thoroughly. The types of data needed to build the evidence could include:

- Up-to-date traffic counts for peak periods including turning movements at junctions
- 12 / 24-hour automatic traffic counts
- Queue length surveys at junctions in that area considered to be critical
- Journey time surveys of key parts of the network
- Freight counts (if applicable and seen as a problem)
- Pedestrian and cyclists counts
- Capacity data for public transport services (rail and bus)
- Car park data
- Accident data on key parts of the network where development impacts are greatest
- Emissions/ Air Quality data

This data will allow this Council/WCC to properly see the constraints and opportunities on the network, which will help inform the spatial distribution of development. As this data collection/analysis work progresses decisions can be made on the correct assessment tools for stages 2 and 3. This is the iterative element, it is critical to make sure that the correct tools are procured to do the job, rushing to procure tools without a better understanding of the challenge could lead to the wrong tools being procured.

2: High level scenario testing

Once the baseline has been established testing of options at a high level can commence. The first level of testing is envisaged to be at a strategic level, testing zones, corridors or other large areas rather than individual sites. This will allow this Council to filter out areas which are likely to have a severe impact on the network which is unlikely to be mitigated. This will also allow the Council to begin testing large scale interventions such a new roads etc. The advantage of this approach is that these interventions are tested in a wider context in conjunction with other options and not in isolation as was done with the western distributor proposal.

3: Transport modelling

This is the more detailed modelling which will look more closely at sites; through this work the Council will clearly be able to quantify the specific impacts of larger development sites. Through this process the Council would also run development scenarios with the mitigation in place, to test that it actually does mitigate the impact of development. This various outcomes from this work will directly inform the preferred option plan.

The timescales for this work are being considered at the moment but it is likely to take up to 18 months to complete this work. This is normal and other evidenced base work which will inform the revised Plan will be developed alongside this evidence. In addition to this work, other transport related work is also taking place which has been summarised in below.

A key part of the STA's future success will be ensuring that BDC are fully represented at all stages and levels of the project. To that end terms of reference have been agreed whereby which the Council's officers are both project managing the STA alongside officers from WCC and other district planning authorities and the Council will also have membership of the board which is overseeing the project. Part of the terms of reference also requires regular update reports being produced to ensure the project stays on track.

Areas to Note

Financial and Legal Implications

For the immediate future the Council will still require the support of Mott MacDonald to ensure that the large planning applications are able to progress to Planning Committee and that the Strategic Transport Assessment will be fit for its intended purpose.

The Council as the local planning authority is under a statutory duty to determine planning applications within certain timescales unless varied by agreement with the developer. Failure to do so could lead to appeals for non-determination. Therefore the Council should do all it can to place itself in a position to determine planning permissions.

Service/Operational Implications

Over a considerable period of time there has and continues to be an enhanced level of scrutiny over how transport planning is carried out across Bromsgrove. Much of that scrutiny has been on the role of Worcestershire County Council. The triggers for this scrutiny have included the planning applications for both Whitford Road and Perryfields Road, as these are live applications this report can not address specific detailed issues in relation to them.

Risk Management

The main risk associated with this report is the ability of the Council to carry out its statutory planning function effectively. This function is both in relation to determining planning applications and producing a development plan. Effective transport planning is key to both functions if this does not take place then the risks of planning appeals and unsound plan become more heightened.

Conclusion

As can be seen from this report it is acknowledged by the Board that there has been issues previously with the way that Transport planning has been carried out in Bromsgrove. Whilst that is unfortunate, a new approach has been identified and detailed within the report and which, assuming all parties engage in it fully, will ensure that going forward transport planning will play a much more effective role in the wider strategic planning function of the Council.

Appendix 1

Timeline of Events

- 26th April 2017
Council
Minute No 109/16 – Council response to Local Transport Plan No 4 Consultation. Detailed discussions took place and Members aired their concerns around the impact of the proposed plan and the need for action to be taken in the Bromsgrove District.
- 21st June 2017
Council
Minute No 13/17 – discussion under the minutes from the meeting on 26th April 2017. Members again discussed their concerns as length, reiterating those which had been raised at the previous meeting. It was agreed that Mott MacDonald or a similar organisation would be appointed to undertake independent traffic data monitoring.
- 20th September 2017
Council
Minute No 55/17 – Notice of Motion from Councillor L. Mallett in respect of the WCC's highways data from 2017. Following a lengthy debate the motion was withdrawn with the agreement that a report on the matters raised would be brought back to Council in November.
- 30th October 2017
Overview and Scrutiny Board
Minute No 51/17 – Pre-scrutiny of Centres Strategy led to request for briefing paper in respect of proposed footbridge over A38.
- 22nd November 2017
Council
Minute No 70/17 – Notice of Motion from Councillor P. MacDonald in respect of LTP4.
- 27th November 2017
Overview and Scrutiny Board
Minute No 66/17 – Verbal updated in respect of the Footbridge over the A38.
Minute No 74/17 – briefing and discussion around the content of the report requested by Council at the meeting held on 20th September 2017 and explanation that the Overview and Scrutiny Board would now co-ordinate this.

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- 15th January 2018 Overview and Scrutiny Board
Minute No 79/17 – interview with officers from WCC who took away a number of questions from Members and agreed to provide responses.
- 26th March 2018 Overview and Scrutiny Board
Minute No 99/17 – a draft outline report of the areas to be covered was presented to the Board.
- 24th May 2018 Overview and Scrutiny Board
Minute No 7/18 – additional information. The matter had been discussed at WCC and Councillor K. Pollock the relevant Portfolio Holder, WCC Officers and a representative from Whitford Vale Voice (a local community group) attended. The report from Mott MacDonald in response to the JMP report was also considered in detail.
- 1st October 2018 Overview and Scrutiny Board
Minute No 46/18 – verbal update, reporting that the Chairman had met with the Strategic Planning and Conservation Manager to discuss the issues highlighted by the Board. It was agreed that a small Group of Members of the Board would meet with key officers from WCC to discuss these in more details and to move the matter forward.
- 22nd October 2018 Private Meeting
The Chairman, together with Councillors S. Colella, P. Thomas and S. Webb met with officers from WCC. The aim of the meeting was to talk through the current position in respect of having the appropriate information to allow the Strategic Planning and Conservation Manager to write the report which had been requested.
- 8th April 2019 Overview and Scrutiny Board
Consideration of this final report and if agreed it will go forward to Cabinet/full Council.

Appendix 2

ACKNOWLEDGEMENTS

WITNESSES

The Board considered evidence from the following sources before making its recommendations:

Internal Witnesses:

Ruth Bamford – Head of Planning and Strategic Housing

Mike Dunphy – Strategic Planning and Conservation Manager

Councillors:

Kit Taylor – Portfolio Holder for Planning and Strategic Housing

External Witnesses:

Nigel Hudson – Worcestershire County Council

Karen Hanchett – Worcestershire County Council

Steve Hawley – Worcestershire County Council

Martin Rowe – Worcestershire County Council

Councillor Ken Pollock – Worcestershire County Council, Cabinet Member with responsibility for Economy and Infrastructure

BACKGROUND PAPERS

Worcestershire County Council LTP4 consultation documentation.

Worcestershire County Council Formal response to Bromsgrove District Council – Overview and Scrutiny Committee July 2018.

Reports and Minutes of meetings of Council and the Overview and Scrutiny Board as detailed in the timeline at appendix 1.

MM BaRHAM technical note

MM review of western distributor appraisal

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE CABINET

WEDNESDAY, 10TH APRIL 2019, AT 6.00 P.M.

PRESENT: Councillors G. N. Denaro (Leader, during Minute No's 92/18 to 98/18), K.J. May (Deputy Leader), B. T. Cooper, C. B. Taylor and P. J. Whittaker

Officers: Mr. K. Dicks, Mrs. S. Hanley, Mrs. C. Felton, Mr O. Paparega, Mr. D. Allen and Mrs. P. Ross

92/18 **TO RECEIVE APOLOGIES FOR ABSENCE**

There were no apologies for absence.

93/18 **DECLARATIONS OF INTEREST**

Prior to the commencement of the meeting Councillor G. N. Denaro had declared an Other Disclosable Interest in Agenda Item no. 8 – Nomination of an asset of Community Value Wythall House and Park, as Trustee and Vice-Chairman of Wythall Community Hall Trust. Councillor Denaro stated that he would leave the room whilst this matter was discussed.

94/18 **MINUTES**

The minutes of the Cabinet meeting held on 27th March 2019 were submitted.

RESOLVED that the minutes of the Cabinet meeting held on 27th March 2019 be approved as a correct record.

95/18 **MINUTES OF THE MEETING OF THE OVERVIEW AND SCRUTINY BOARD HELD ON 4TH MARCH 2019**

The minutes of the Overview and Scrutiny Board meeting held on 4th March 2019 were considered.

RESOLVED that the Minutes of the Overview and Scrutiny Board meeting held on 4th March 2019 be noted.

96/18 **FORMER MARKET HALL SITE REDEVELOPMENT - PHASE 2**

Members considered a detailed report which provided an update on the legal agreement with the Hinton Group, outlined the key site constraints, the delivery options and the next steps for the Markey Hall Phase 2 site.

It was noted that as detailed in the report that the redevelopment of Phase 2 had been a challenge for the developer to deliver.

Following a brief discussion it was

RESOLVED:

- a) that the update with regards to the Market Hall Phase 2, be noted;
- b) that it be noted, that a termination notice had been served to end the legal agreement with the Hinton Group, in accordance with the agreement's termination clause;
- c) that the submission of an Expression of Interest to the Future High Streets Fund that has the Market Hall Phase 2 site as its development focus, be noted; and
- d) that soft market testing be undertaken in order to assess developer and end occupier interest to inform a viable delivery route for the site.

97/18

PRIVATE SECTOR HOME REPAIR ASSISTANCE POLICY UPDATE

The Cabinet considered a report on the Private Sector Housing Policy. The report provided an overview of the updates made to the Council's Private Sector Housing Assistance Policy, attached at Appendix 1 to the report.

The Strategic Housing Manager informed Members that the policy had been updated in line with a recommendation from the Audit that was conducted during 2017/2018; which highlighted that the existing policy needed to be updated in order to reflect changes around loan limits for applicants and local land charge arrangements.

RESOLVED that the changes made to the Private Sector Housing Assistance Policy, be noted and that the implementation of the policy, as detailed at Appendix 1 to the report, be approved.

98/18

RESPONSE TO SOLIHULL SUPPLEMENTARY LOCAL PLAN CONSULTATION

The Cabinet considered a report detailing the response of Bromsgrove District Council to the Solihull Draft Local Plan supplementary consultation; the officer response was detailed at Appendix A to the report.

RESOLVED that the officer response to the Solihull Local Plan Review supplementary consultation, as detailed at Appendix A to the report, be endorsed.

RECOMMENDED:

- a) that the officer response to the Solihull Local Plan Review supplementary consultation, as detailed at Appendix A to the report, be approved as the Council's formal response; and that this be confirmed with Solihull Metropolitan Borough Council.

99/18

CONSULTATION ON THE LISTING OF AN ASSET OF COMMUNITY VALUE AT WYTHALL

The Cabinet considered a report on an application to list Wythall House and Park as an Asset of Community Value (ACV).

A letter from Wythall Community Hall Trust was detailed in the Supplementary Agenda papers.

Paragraph 3.7 of the report stated that Wythall House and Park met all of the statutory criteria for listing, as detailed in paragraph 3.9 of the report.

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

RESOLVED that the application for listing of Wythall House and Park as an Asset of Community Value be supported.

100/18

ANY OTHER BUSINESS

With the agreement of the Deputy Leader, Councillor B. T. Cooper expressed his sincere thanks to the Leader of the Council for having the confidence in him by appointing him onto the Cabinet; to the Cabinet Members, Chief Executive and Senior Officers for their support.

In response, the Deputy Leader gave sincere thanks, on behalf of the Cabinet Members to Councillor B. T. Cooper for his help and hard work, in working towards the strategic purposes of the Council.

With the agreement of the Deputy Leader, the Chief Executive also expressed sincere thanks to Councillor B. T. Cooper, on behalf of the s151 officer, who Councillor B. T. Cooper had worked closely with, in his role as Portfolio Holder for Finance.

The meeting closed at 6.09 p.m.

Chairman

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE CABINET

12TH JUNE 2019, AT 6.00 P.M.

PRESENT: Councillors K.J. May (Leader), G. N. Denaro (Deputy Leader), A. D. Kent, M. A. Sherrey, P.L. Thomas and S. A. Webb

Observers: Councillor M. Thompson

Officers: Mr. M. Dunphy, Ms. C. Flanagan, Mrs. S. Hanley, Ms. J. Pickering, Ms. A. Scarce and Mrs. R. Green

1/19 **APOLOGIES**

There were no apologies for absence.

2/19 **DECLARATIONS OF INTEREST**

There were no declarations of interest.

3/19 **TO CONFIRM THE ACCURACY OF THE MINUTES OF THE MEETING OF THE CABINET HELD ON 10TH APRIL 2019**

The minutes of the Cabinet meeting held on 10th April 2019 were submitted.

RESOLVED that the minutes of the Cabinet meeting held on 10th April 2019 be approved as a correct record.

4/19 **MINUTES OF THE MEETING OF THE OVERVIEW AND SCRUTINY BOARD HELD ON 8TH APRIL 2019**

The Leader thanked Councillor M. Thompson, for attending the meeting to present the Overview and Scrutiny Board minutes.

Councillor Thompson advised that the only recommendations within the minutes were those included in the Transport Planning Review Report which was a separate item on the Cabinet agenda.

RESOLVED that the minutes of the Overview and Scrutiny Board meeting held on 8th April be noted.

5/19 **OVERVIEW & SCRUTINY BOARD - TRANSPORT PLANNING REVIEW FINAL REPORT**

Councillor M. Thompson, as Chairman of the Overview and Scrutiny Board, presented the report and drew Members attention to the timeline on page 35 of the agenda, which documented the circumstances which had brought the Board to carry out this investigation. The subsequent recommendations were detailed on pages 18 and 19 of the agenda. Councillor Thompson advised that he had not been heavily involved in the investigation and suggested that Councillors P. Thomas and S. Webb, who had been Members of the Board at the time of the investigation, may be better placed to comment further.

Councillors Thomas and Webb agreed that the report gave a good reflection of the investigation and discussions which took place.

The Leader thanked Councillor Thompson for his attendance and confirmed that the report would be given full consideration at the Council meeting to be held on 26th June.

6/19

HIGH QUALITY DESIGN - SUPPLEMENTARY PLANNING DOCUMENTATION

Councillor A. Kent, Portfolio Holder for Planning and Regulatory Services, introduced the report and in so doing commented that, in view of developments in respect of solar panelling and climate change elements, he would like to see a bigger emphasis on those areas within the document.

The Strategic Planning and Conservation Manager responded that this document concentrated more on the design element and that those areas may be better placed within an additional Supplementary Planning Document (SPD) at a future date, which could also include any legislative changes that may come forward. However, Members were asked to note that an SPD could only include supplementary information and not a new policy. Officers would therefore look at how reference to the areas discussed could be strengthened. In the meantime, this policy needed to be adopted.

Councillor Kent confirmed that he would arrange to meet with Officers to discuss these additional areas as soon as possible. He also commented that the responses to the consultation were appreciated and asked whether this was fed back to the respondents. The Strategic Planning and Conservation Manager advised that the responses were made public through the website.

RESOLVED that the Consultation Comments and Officer Responses' table made in response to consultation on the draft High Quality Design SPD, and the actions proposed by strategic planning officers to make subsequent revisions to the SPD, be noted.

RECOMMENDED that Full Council adopts the revised version of the High Quality Design SPD as detailed in Appendix 1 of the report.

7/19

STATEMENT OF COMMON GROUND - APPROACH TO AGREEMENT WITH LOCAL AUTHORITIES

Members were advised that this was a statutory document and the Strategic Planning and Conservation Manager explained that essentially this was a procedural requirement, formalising the Duty to Co-Operate and introduced a more formal process in respect of discussions which needed to be held between authorities. Members were assured that should there be anything significant in these discussions, requiring Member input, the matter would be brought to full Council and provided examples of the different circumstances that might arise.

The key items in the framework were highlighted with particular reference being made to; (b) the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc., (e) if applicable the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement and (f) distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area. If none of these were involved and there were no likely issues to get through the process, then the delegation would be used. Such matters would then be reported back through an annual monitoring report.

RESOLVED that officer attendance is required at DtC/SoCG meetings where cross boundary issues and draft SoCG agreements are discussed and prepared, be noted.

RECOMMENDED:

- a) that Council delegate to the Leader and Portfolio Holder for Planning authority to sign off all relevant SoCG where cross boundary growth is not included; and
- b) that all SoCG which include agreements on cross boundary housing, employment or other development needs or any other development needs or any other key planning issue are reported to Council for consideration prior to signing.

8/19

CORPORATE PERFORMANCE REPORT - HELP ME BE FINANCIALLY INDEPENDENT

The Executive Director, Finance and Resources, introduced the report and highlighted a number of area for Members attention, this included:

- Supporting residents to reduce levels of individual debt and the work of the Financial Inclusion Team.
- Debt was the highest reason recorded as to why cases were referred to that team, and the cause of debt.

- Supporting communities during changes to welfare and benefits and issues around the Benefits service not dealing with benefit claims in a timely manner.
- Work carried out with the DWP to address the problems identified and the improvements that have been made.
- Implications of Universal Credit – it was anticipated that there would be less impact due to the older and more stable working population in the district.
- Those claiming ELF due to a delay in benefits had fallen significantly to align with the improvements made to speed up the processing time.
- Applications for ELF and reasons for application and the three key reasons for making a claim for ELF.
- The affordability ratio in respect of purchasing housing on the open market and the need to address this.
- Areas for future focus, including fuel poverty and affordable homes.

Councillor G. Denaro, Portfolio Holder for Finance and Enabling confirmed that the Executive Director, Finance and Resources had covered all the relevant points and that there were some interesting statistics to be considered.

Members discussed the possibility of promoting and raising awareness to residents regarding the benefits which were available to them, in particular the pension credit. The Executive Director, Finance and Resources confirmed that a further meeting was due to take place with the DWP and that this was something which could be discussed with them. The Leader requested that this was also placed on the agenda for the next Leader's Group meeting.

RESOLVED that the content of the Performance Report 'Help me be financially independent' and associated appendix be noted.

9/19

CORPORATE PERFORMANCE REPORT - HELP ME RUN A SUCCESSFUL BUSINESS

In the absence of the Chief Executive, the Deputy Chief Executive presented the report for Members' consideration and in so doing highlighted the following areas:

- The seven Bromsgrove District Centre covered by the Centres Strategy for 2017-2020.
- The themed outcomes of the Strategy and how the Council measured success and impact.
- The work of the Town Centres Manager and the relationships she has established with parish councils, business and local communities in developing local initiatives.

- The expression of interest for funding from Central Government which had recently been applied for, the outcome of which was expected in September.
- Two key strategic studies which were being undertaken in Bromsgrove Town Centre.
- Data provided following the Community Panel survey which had been carried out – it was confirmed that full details of this would be provided in due course.
- Encouraging local business and inward investment – the support provided by NWedR and funding provided to them.
- Improving connectivity within Bromsgrove (Digital and Transport) - key priorities including infrastructure and night time economy.

Members were advised that the report also included, as had been previously agreed, corporate sickness data on a bi-monthly basis. The Deputy Chief Executive advised Members that work had been done to support managers and officers in all services to ensure the process was consistent throughout.

Following presentation of the report Members the Leader confirmed that the Bromsgrove Centres Strategy would be reviewed and she was keen for it to be widened to include other areas such as Aston Fields. It was clear from the views of the survey undertaken with the Community Panel that the Council was working in the right direction and need to push forward with the Strategic Transport Assessment for the north of the County which would help address a number of issues.

Councillor Denaro commented that in respect of the sickness data it had been confirmed that the increase in long term absence had been due to 2 long term absences which had now been resolved and that the short term absences were predominantly in one area and this was being addressed.

Members questioned the make-up of the Community Panel and the Policy Manager explained that it was made up of around 200 people from a cross- section of the community, although it was hoped that this would be developed further and be more representative in future. The next survey would be in September 2019. It was suggested that Members could be involved in the promotion and distribution of the survey. It was confirmed that support from Members would be greatly appreciated.

Members also discussed the small businesses that had been set up and whilst this was encouraged, concerns were raised in respect of there being limited opportunities for such businesses to develop further. It was therefore important to ensure that this was addressed to ensure that those businesses did not move out of the District.

RESOLVED that the contents of the report and associated appendix in respect of the Corporate Performance Report 'Help me run a successful business' be noted.

10/19

OUTSIDE BODIES BY OFFICE (EXECUTIVE APPOINTMENTS)

Members considered a report in respect of appointments and nominations to a number of Outside Bodies, some of which were for executive functions and were made by the Cabinet.

RESOLVED that the appointments to outside bodies listed in appendix 1 be agreed.

The meeting closed at 6.40 p.m.

Chairman

Response of BDC on Solihull Draft Local Plan Supplementary Consultation

Relevant Portfolio Holder	Councillor Kit Taylor
Portfolio Holder Consulted	Yes
Relevant Head of Service	Ruth Bamford
Wards Affected	All Wards
Ward Councillor Consulted	No
Non-Key Decision	Yes

1. SUMMARY OF PROPOSALS

1.1.1 Solihull Metropolitan Borough Council (SMBC) have published the Solihull Local Plan Review supplementary consultation. It is requested that the officer response as summarised below and included in full at appendix A, is endorsed by BDC members. Due to the deadline of the representations period, the initial response has been submitted as an officer response.

2. RECOMMENDATION

- 2.1 That cabinet endorses the officer response to the Solihull Local Plan Review supplementary consultation (as attached at Appendix A)
- 2.2 That Cabinet recommends to Council, that the officer response to the Solihull Local Plan Review supplementary consultation, be approved by Council as its formal response, and that it is confirmed with SMBC as such.

3. KEY ISSUES

Financial Implications

3.1 There are no direct financial implications associated with this report.

Legal Implications

3.2 There are no direct legal implications associated with this report, although it is important that the Bromsgrove District Council respond to relevant consultations from other Local planning authorities, to ensure the Councils views are fed into all stages of the plan making process. In due course the Council will be required to agree a statement of Common Ground with SMBC over the content of their plan.

Service / Operational Implications

Summary of Response - Solihull Draft Local Plan Supplementary Consultation

- 3.3 At this stage the response to SMBC focuses on two key areas, the wider contribution SMBC are making to the Birmingham and Black Country Housing Market Area (HMA), and the infrastructure provision required to support the allocations in the Plan. The response is very similar to a previous BDC response submitted in 2017

- 3.4 In simple terms SMBC haven't established their position with regards to the contribution they will be making over and above their own needs to the wider HMA, this decision has been left to the pre submission version of the plan. It is the view of BDC officers leaving a decision on such a key element of the plan to so late in the process is not appropriate, and should be addressed in advance of the pre-submission version.

- 3.5 With regards to the infrastructure provision at this stage, as at the previous stage, it is unclear what the infrastructure requirement and proposed provision will be to support the development sites included in the plan. This is a key concern to BDC as some sites are close to the BDC border in the Wythall/Hollywood area of the district. The response stresses the need for full information to be provided for the next stage of the plan process in order for BDC to understand how the impacts of any development will be mitigated.

Customer / Equalities and Diversity Implications

- 3.8 There are no Customer / Equalities and Diversity Implications associated with this report.

4. RISK MANAGEMENT

- 4.1 The risks associated with not submitting a representation is that BDCs views will not be taken into account by SMBC when preparing the next version of their plan.

5. APPENDICES

Appendix A – BDC response to SMBC

AUTHOR OF REPORT

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15th March 2019

Dear Sir / Madam,

Solihull Draft Local Plan Supplementary Consultation

Bromsgrove District Council Consultation Response

Bromsgrove District Council (BDC) welcomes the opportunity to comment on the Solihull Draft Local Plan Supplementary Consultation. This response represents an informal view at this stage.

BDC has read the Supplementary Consultation (January 2019) with interest and wishes to comment on the parts of the draft plan that are relevant to the district and the wider Greater Birmingham Housing Market Area (GBHMA). Our comments draw on those made to your earlier Draft Local Plan (2016) consultation, which raised concerns over the consideration of the wider housing needs of the GBHMA and the allocation of sites in the vicinity of Bromsgrove District and the resulting potential cross boundary impacts of developing these areas.

Duty to Co-operate Issues

Paragraphs 25-29 of the consultation document relate to the Duty to Co-operate and we welcome recognition of this. However, it is noted that Paragraph 27 in particular acknowledges previous consultation representations that Bromsgrove District Council (amongst others) has submitted. This being that there is no clear justification as to why 2,000 dwellings was chosen as the figure Solihull could accommodate towards the GBHMA shortfall.

As we have stated previously, it is important to ascertain how any contribution, 2000 dwellings or otherwise, has been arrived at and how it has been concluded that this is an 'appropriate proportion'. This figure was not agreed by the Greater Birmingham and Black Country Authorities and therefore, the 2,000 dwellings contribution from SMBC cannot be considered to have been formally agreed and is not a firm basis on which to progress a sustainable development strategy and site allocations. This is a fundamental issue that would need to be set out within a Statement of Common Ground in accordance with the Duty to Co-operate Requirements within the Revised National Planning Policy Framework. Any contribution towards meeting the shortfall from the GBHMA should have support of the GBHMA authorities and should be based on an apportionment methodology.

Despite this, we note that Paragraph 29 of the consultation document still refers to Solihull's contribution towards the GBHMA shortfall as 2,000 dwellings, but with the potential for this to be revised at submission draft stage remaining. Furthermore, Paragraph 51 affirms that the consultation is not seeking views on any potential addition that the Council may make towards the GBHMA shortfall and that the Council will incorporate its response to the Strategic Growth Study at submission stage. We are concerned that there has been little change in this position over the 2016-2019 time period.

It is considered that submission stage is too late on in the process to address the Borough's contribution to the GBHMA housing shortfall as this will have significant connotations for the overall development strategy and could also have knock on effects on neighbouring areas. Furthermore, it is imperative that any increase in the overall dwelling figures is subject to options testing and sustainability appraisal. We therefore urge SMBC to progress a Statement of Common Ground to establish the appropriate figure to meet the GBHMA shortfall prior to submission stage.

Proposed Allocations and Site Selection Methodology

SMBC will be aware that BDP has previously raised a number of concerns relating to its proposed site allocations adjacent to the District's north eastern boundary and the potential cumulative impacts that this could have on settlements in Bromsgrove in particular Wythall and Hollywood. We wish to reiterate that these concerns still stand and again would request that these are fully addressed prior to submission stage under the Duty to Co-operate requirements.

It is noted that with regard to proposed site allocations at Blythe (Dickens Heath, Cheswick Green & Tidbury Green), Paragraph 118 states "As a whole the villages benefit from some key facilities and Whitlock's End Station has been upgraded with 3 services per hour to Birmingham and Stratford. However, the wider sub area suffers from poor public transport provision with limited bus services between settlements, which perpetuates travel by private car." (Our emphasis)

It is imperative that public transport improvements are sought as well as highway capacity improvements as this could have adverse impacts on the communities to the north east of Bromsgrove District such as Wythall & Hollywood. We have also previously cited concerns relating to the potential impact on other components of infrastructure for example schools and GP surgeries within these settlements. There appears to be little in the consultation document that begins to address these potential impacts, and it is considered that a great deal of evidence based work is still needed with regards to infrastructure requirements and provision.

Officers from the Council will be more than willing to meet with SMBC representatives to try and ensure that the issues outlined above are addressed through the progression of a Statement of Common Ground.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'R. W. J.', written in a cursive style.

Ruth Bamford
Head of Planning and Regeneration
Bromsgrove and Redditch Councils

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Cabinet

12th June 2019

High Quality Design Supplementary Planning Document

Relevant Portfolio Holder	Councillor A. Kent
Portfolio Holder Consulted	
Relevant Head of Service	Ruth Bamford
Wards Affected	All
Ward Councillor Consulted	N/A

1. SUMMARY OF PROPOSALS

- 1.1 The Bromsgrove District Plan 2011-2030 (BDP) was adopted on 25th January 2017; the High Quality Design Supplementary Planning Document (SPD) provides more detailed guidance on a number of policies in the BDP.
- 1.2 A draft version of the SPD was consulted on in early 2018 and has since been subject to a number of revisions as a result of consultation responses.

2. RECOMMENDATIONS

- 2.1 **That Cabinet notes the ‘Consultation Comments and Officer Responses’ table made in response to consultation on the draft High Quality Design SPD, and the actions proposed by strategic planning officers to make subsequent revisions to the SPD.**
- 2.2 **That Cabinet notes the revised version of the High Quality Design SPD and recommends the document to be adopted by a meeting of Full Council.**

3. KEY ISSUES

Financial Implications

- 3.1 Work carried out on the preparation of the SPD, including public consultation and responding to issues arising, has been carried out in the context of existing departmental budget and additional finances are not required.

Legal Implications

- 3.2 The SPD has been produced in accordance with the relevant legislation, in particular the Town and Country Planning (Local Planning) (England) Regulations 2012. Once adopted, the SPD will be a material consideration in the determination of planning applications.

Cabinet

12th June 2019

- 3.3 The recommendations outlined earlier in this report seek approval by Cabinet that the High Quality Design SPD be presented to a meeting of Full Council with a recommendation to formally adopt the document.

Service / Operational Implications

- 3.4 The High Quality Design SPD will be a material consideration in planning decisions within the district and will provide further guidance for determining planning applications. On adoption of this SPD, four existing pieces of supplementary planning guidance (SPG), which were adopted in 2004, will be superseded.
- 3.5 Strategic planning officers have worked closely with colleagues in development management and the district's conservation officers to ensure the SPD is fit for purpose in the determination of planning applications. Consultation meetings, and subsequent revisions to the SPD, have also taken place to ensure the consultation responses have where possible been fully incorporated into the document.

Customer / Equalities and Diversity Implications

- 3.6 The public consultation provided the opportunity for those living and working in the district, and/or for those with an interest in planning and design in the district to comment on the content of the SPD.
- 3.7 All statutory consultees, including parish councils, were consulted as part of the engagement process, as will a range of other interested parties. A range of internal council colleagues were also consulted during the formal consultation period.

4. RISK MANAGEMENT

- 4.1 Without adopting this High Quality Design SPD, the existing SPG1, SPG2, SPG4 and SPG5 will continue to be used. These documents were adopted in 2004, but were initially drafted in 1994 and are therefore considered to be extremely dated. Furthermore the guidance contained in these documents, whilst in some cases still relevant, also relates to the superseded Bromsgrove District Local Plan 2004 rather than the current BDP adopted in 2017.
- 4.2 The new High Quality Design SPD will ensure that up-to-date guidance is available based on the existing BDP policies. This will aid the achievement of high quality design in planning proposals, will help decision-making for planning applications, and should reduce the number of applications needed to be determined by appeal.

5. APPENDICES

Cabinet

12th June 2019

Appendix A – Bromsgrove District High Quality Design SPD
(publication version)

Appendix B – ‘Consultation Summary and Officer Response’ table

6. BACKGROUND PAPERS

Bromsgrove District Plan 2011-2030

7. KEY

BDP – Bromsgrove District Plan

SPG – Supplementary Planning Guidance

SPD – Supplementary Planning Document

AUTHOR OF REPORT

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High Quality Design SPD

Publication Version

June 2019





High Quality Design SPD

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This SPD should be read in conjunction with the National Planning Policy Framework, Planning Practice Guidance, The Bromsgrove District Plan 2011-2030 and Worcestershire County Council standards and requirements.



High Quality Design SPD

1. Introduction

1.1 What is an SPD?

1.1.1 This Supplementary Planning Document (SPD) supplements the Districts' adopted Development Plan and therefore reflects the Council's policies. As such it is a material consideration in the determination of planning applications and will be given substantial weight in the decision making process. An SPD guides various forms of development, ensures consistency in decision making and provides clarity for applicants in knowing the parameters of what is expected by the Council.

1.1.2 The purpose of this High Quality Design SPD is to supplement the policies in the development plan and to provide detailed guidance on how a high standard of design could be achieved in new development.

1.1.3 The Bromsgrove District Plan (Adopted 2017) contains Policy BDP19 'High Quality Design, which sets out what the Council expects new developments to achieve. The purpose of this SPD is not to repeat the principles within these policies but to expand upon them and provide more detailed design guidance for applicants seeking planning permission.

■ BDP19 High Quality Design

BDP19.1 The Council will deliver high quality people focused space through:

- a. Requiring developments to use appropriate tools and follow relevant guidance and procedure to achieve good design;
- b. Preparing a Design Guide Supplementary Planning Document;
- c. Encouraging the use of sustainable construction methods and materials;
- d. Ensuring all non-residential developments meets the BREEAM 'very good' standard or other successor guidance;
- e. Ensuring development enhances the character and distinctiveness of the local area;
- g. Supporting all major developments that help facilitate interaction between future occupants;
- h. Promoting developments to include new Public Art;
- i. Creating and enhancing gateway locations and key approach corridors as well as protecting and enhancing important local and longer-distance visual corridors;
- j. Ensuring developments are accessible to all users;
- k. Ensuring permeable, safe and easy to navigate street layouts;
- l. Avoiding road-dominated layouts by supporting the design of streets to follow the user hierarchy: 1) pedestrian; 2) cyclists; 3) public transport users; 4) specialist service vehicles (e.g. emergency services, waste, etc.); 5) other motor traffic;
- m. Encouraging 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;
- n. Development of garden land will be resisted unless it fully integrated into the residential area, is in keeping with the character and quality of the local environment;
- o. Designing out crime and the fear of crime by incorporating measures and principles consistent with those recommended by 'Secured by Design';
- p. Ensuring all trees that are appropriate (e.g. in terms of size, species, conditions and predicted climate) are retained and integrated within new development;



High Quality Design SPD

■ BDP19 High Quality Design *continued*

- q. Ensuring development incorporates sufficient, appropriate soft landscaping and measures to reduce the potential impact of pollution (air, noise, vibration, light, water) to occupants, wildlife and the environment;
- r. Ensuring development is made suitable for the proposed final use, for instance, in terms of land contamination and, where relevant, does not create an unacceptable risk to controlled waters (where relevant). The Council will determine whether reports detailing for example, site history; a preliminary risk assessment and where appropriate; a site investigation and remediation scheme along with long term monitoring and maintenance proposals, will need to be submitted in support of any planning application. Such reports will be prepared in accordance with best practice guidance;
- s. In relation to air quality all new developments with a floor space greater than 1000sqm or 0.5 hectare or residential developments of 10 or more units should 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:
 - i. All planning applications meeting the above criteria should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance. The applicant will also take into account the cumulative impacts of validated developments in the local area. Additionally, the assessment should consider the impact of local air quality on the proposed development;
 - ii. Development with the potential to result in significant impact on air quality, either cumulatively or individually will be resisted unless appropriate measures to mitigate the impact of air pollutants are included. Development will be expected to contribute to the provision of adequate mitigation measures in accordance with BDP6;
- t. Development proposals should maximise the distance between noise sources (for example motorways) and noise sensitive uses (such as residential), whilst also taking into account the implications of the existing night time use of the locality;
- u. Ensure a feasible and viable management plan is available for all facilities and provisions arising from the development;
- v. Ensuring development makes the best use of land in accordance with BDP7 Housing Mix and density.

BDP19.2 For large scale developments, developers will need to prepare Design Codes for the area, which would then serve to inform all development in the area as they come forward.

1.1.4 Once adopted, this SPD replaces the following supplementary planning guidance:

- SPG1 Residential Design Guide
- SPG2 Shopfronts and Advertisements
- SPG4 Conversion of Rural Buildings
- SPG5 Agricultural Buildings Design Guide

1.1.5 In addition to Policy BDP19, of particular importance to the guidance previously contained in the above SPG documents, which this SPD now supersedes, are the contents of Bromsgrove District Plan Policy BDP20 'Managing the Historic Environment'.

1.1.6 Applicants for planning permission should ensure they are familiar with the statutory requirements of these policies and read the guidance contained in this SPD in the context of these development plan policies.



High Quality Design SPD

1.2 What does this SPD cover?

1.2.1 This SPD focuses on how a high standard of design can be achieved on new types of development in the District. Design can be defined as the look, function, arrangement or workings of an area or building(s) including transport routes, waterways and open spaces. This Design SPD provides an overview of design principles and sets out the requirements the Council have when assessing planning applications.

1.2.2 The Design SPD aims to:

- Be a starting point for the design process;
- Be a practical source of ideas and suggestions; and
- Help applicants assess the issues which may arise from a proposed development.

1.3 Who is the SPD for?

1.3.1 The Council has produced this Design SPD to help anyone considering any type of building or landscaping works, whether or not it requires formal consent (planning permission). This includes:

- Home owners;
- Developers;
- Farmers;
- Local businesses including shop owners and occupiers;
- Utilities and other operators of public services;
- Agents acting on behalf of any of the above;
- Planning Officers;
- Planning Inspectors;
- Statutory and non-statutory consultees.

1.4 What is the purpose of this SPD?

1.4.1 High quality design is crucial to promoting sustainable development and ensures that the character and appearance of an area, and the street scene in general, is not harmed but also enhanced. A well-designed development will enhance the existing built and natural environment, be appropriate to its intended use, support safer communities and include innovative design.

1.4.2 The Bromsgrove District Plan 2011-2030 was adopted on 25th January 2017 and therefore the local framework and policies against which planning applications are assessed changed on that date.

Although there may be previous developments in the vicinity, applications are based on their individual merits and assessed against current policy at that time. Therefore the outcome of an application will be independent of previous decisions.

1.4.3 Proposed development will need to consider its immediate locality. Consideration must be given to the type of environment surrounding the development site, as this gives an understanding as to what may be permitted. Even with smaller proposals the local context and immediate surroundings will provide some understanding as to what may be permitted, and proposed development should seek to reflect the character and principles of this immediate locality. In terms of the definition of the immediate locality, this refers to what you can immediately see around you, what is in your field of vision.

1.4.4 This SPD will help in the formulation of proposed development to ensure that it is policy compliant by being a reasonable scale, layout, height, material, and colour, as well as respect the existing surrounding built environment and local character.

1.4.5 All applications will be considered on a case-by-case basis; however, they will be judged against the relevant policies in the **Bromsgrove District Plan**, National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) as well as the Council's relevant SPDs and policies of any relevant made neighbourhood plans.

1.4.6 Many applicants cite precedent as a reason their Planning Application should be approved. Precedent is when a planning application may have similar elements to that of a nearby or previous development which has been granted planning permission and has been implemented. In many cases there may be similar elements to planning applications but due to the nature of planning there are usually more elements which differ, making a decision and the role of precedent complex.

“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

NPPF Paragraph 124

“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”

NPPF Paragraph 130



1.5 When would this SPD be used?

1.5.1 This SPD must be used where consent is required and can be used as a guide where consent is not required, to ensure that the standards of design of all types of development are raised.

1.5.2 It is important to note that this guidance is not intended to be a substitute for professional advice. You are responsible for ensuring that the correct permissions are obtained before undertaking any development.

2. Preparing your application

2.1 Before applying for planning permission

2.1.1 Once you have decided what you want to do, you will need to design it appropriately taking into account the information within this Design SPD. You will also need to determine whether your proposal requires planning permission or if it can be undertaken via Permitted Development Rights (PDRs).

2.2 Permitted Development Rights (PDRs)

2.2.1 PDRs are afforded to most developments to enable owners to carry out certain works without planning permission under the Town and Country Planning (General Permitted Development)(England) Order 2015 (as amended)¹. The Order sets classes of development for which certain types of works and development can be completed without the need to apply for planning permission.

2.2.2 Property owners should check with the Planning Department to determine whether their property still has its PDRs before commencing any building work to the property. If PDRs have been withdrawn any works covered by the regulations must be applied for via planning permission.

2.2.3 It should be noted that PDRs are complex and subject to interpretation and exceptions, for instance PDRs are restricted in Conservation Areas and different PDRs apply to commercial developments, maisonettes, flats and Listed Buildings.

2.2.4 Developments which can be undertaken via permitted development should take into account the information within this SPD to ensure there are no adverse impacts on neighbours. Regardless of whether formal consent is required or not, it is advised that you speak to your neighbours about the proposed development, and try to avoid impacting on neighbours privacy and amenity.

2.2.5 Each site or building has its own unique characteristics, and different considerations will apply to different sites or buildings. Gaining an understanding of what a site's unique characteristics are should form an important early stage in the design process.

■ Planning Portal

The Planning Portal provides the most up to date guidance on PDRs and it provides useful interactive tools to assist in determining which projects would or wouldn't require planning permission. Please visit the Planning Portal website at www.planningportal.gov.uk.

For further information or clarification you can speak to the Council by:

- Contacting the Planning Services team **Monday to Friday 9am to 5pm on 01527 881 770;**
- Talking to a Planning Officer **Tuesdays 10am-1pm at Parkside, Bromsgrove;**
- Emailing your enquiry to **Newplan@bromsgroveandredditch.gov.uk;** or
- Attending a pre-application discussion, which you can organise using the above contact details (please see <http://www.bromsgrove.gov.uk/planning-and-building-control/planning-permission/check-if-you-need-planning-permission.aspx> for relevant fees).

Many of the works allowed under permitted development and those which require planning permission also require Building Regulations approval. Please contact the North Worcestershire Building Control Department for further details at **01527 881 402** or email **b.control@bromsgroveandredditch.gov.uk**.

1. Please note that there may be future changes/allowances to permitted development rights which may make some parts of this SPD obsolete.



High Quality Design SPD

2.3 Submitting an application

2.3.1 For information on the documents required for submitting a planning application, please visit the Council website: <http://www.bromsgrove.gov.uk/planning-and-building-control/planning-permission.aspx>. It is advised you seek professional help in drawing up the plans.

Please note, all plans and drawings must be drawn to an identified scale and, in the case of plans, shall show the direction north. Online applications can be made via the planning portal - www.planningportal.co.uk

2.3.2 The Council balance a large number of factors when determining planning applications. It is strongly advised that applicants take into account the relevant information in this SPD and policies in the BDP, any relevant made neighbourhood plans, and the NPPF before submitting a planning application. All applications will be assessed on a case by case basis taking into account the individual circumstances specific to the application. Please note that only material planning considerations² will be taken into account when determining an application.

2.3.3 Most Planning Applications will be publicised by either a site notice or through letters to neighbouring properties. Further forms of publicity will be used where the development is a Listed Building or in a Conservation Area. For information on how, when and who the Council consult on planning applications, please see the Statement of Community Involvement which is available on Bromsgrove District Council's website: <http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/statement-of-community-involvement.aspx>

2.3.4 Building regulations are completely separate to planning permission under Town and Country Planning Legislation. The granting of approval under either does not give consent for the other. In some cases only building regulations approval will be needed and sometimes only planning permission, although in most cases both will be required.

2. Planning applications will be determined in accordance with the development plan for an area, unless material considerations indicate otherwise. Whilst not strictly defined, a material planning consideration is one which is relevant to making the planning decision in question. The courts have generally held that planning concerns land use in the public interest, and therefore purely private interests could not be considered a material planning consideration <https://www.gov.uk/guidance/determining-a-planning-application>

2.4 How are applications assessed?

2.4.1 Planning Officers are required to assess each Planning Application on its own merits. It will be for the applicant to ensure they have maximised every opportunity for the scheme to be as well designed as possible and achieve the principles in this SPD.

2.4.2 Case Officers will consider the merits of the individual application; case officers are more likely to consider an application favourably if the development has been designed as thoughtfully as possible, incorporating the principles of this SPD.

For more information on how applications are assessed, please see the Statement of Community Involvement <http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/statement-of-community-involvement.aspx>.

3. Residential Development - Alterations and Extensions

3.1 Key considerations for all extensions

3.1.1 When considering an alteration or extension to a property it is essential to consider whether in the first instance a property should and could accommodate an alteration or extension or not. In some cases it will not be appropriate for a property to have an alteration or extension due to a range of reasons such as character of the property or proximity to adjoining neighbours.

3.1.2 To determine this, there are three main issues which alterations or extension applications will need to take into account and address:

1. Developments should ensure they protect and consider the impact on neighbouring amenity.
2. Consideration of the impact on neighbouring properties and the impact on the street scene.
3. Extensions should enhance, protect and give consideration to any impact of the development on the existing dwelling.



3.1.3 Other planning considerations such as Green Belt, protected and priority species, highways impacts, sustainability of construction, heritage assets, and nearby trees may need to be taken into account.

3.1.4 The following paragraphs under Section 3.1 detail the key considerations necessary for all alterations or extensions. Sections 3.2 to 3.10 of the SPD relate to specific types of alterations or extensions, for example side or rear extensions. The key considerations should be used in conjunction with the information in these sections.

Complement the original property

3.1.5 Enhance the dwelling and protect and give consideration to any impact of the development on the existing dwelling. The alteration or extension should complement the scale, general massing, and materials of the existing building and remain subservient to it. Matching bricks, roof tiles or other facing materials in form, colour and texture should be used. Where there are existing features of interest, these should be preserved.

Extensions must be subordinate

3.1.6 Keep width, height and bulk in proportion to the existing property, thus avoiding making the extension the central feature of the building. The form and mass of an extension should take into account the scale and mass of the existing building and be proportionate in size.

Neighbour impact

3.1.7 Ensure that consideration has been given to the impact on neighbouring occupiers and protection of neighbouring amenity. This can be achieved by ensuring proposals take account of: i)

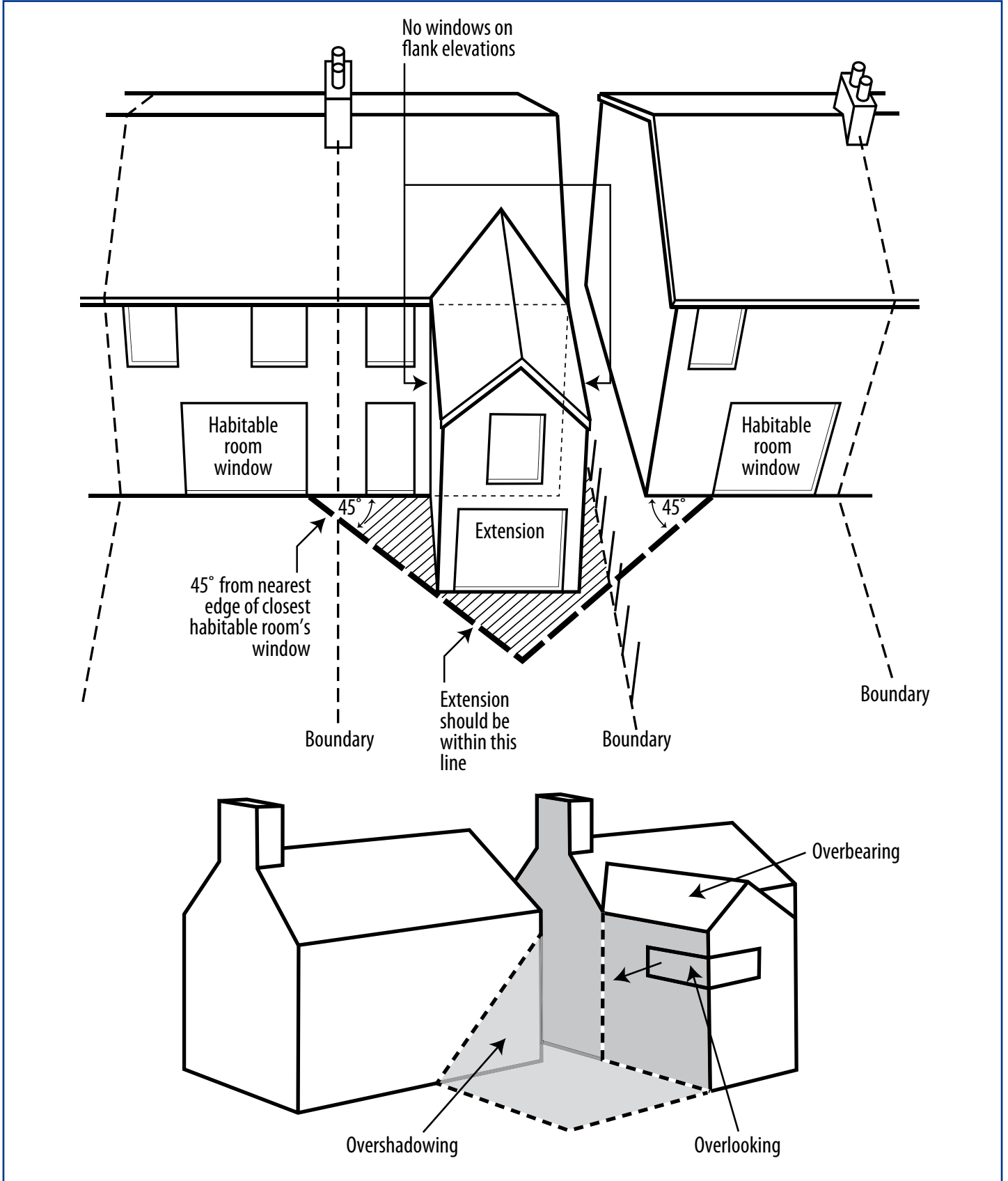
- i) **Overlooking** - This may be a problem if a new extension allows views into the private amenity or living space of your neighbour. Problems may also arise where an extension would result in a loss of outlook. However, overlooking is desirable where the spaces being overlooked are public spaces as this provides surveillance and can deter criminal activity and anti-social behaviour.
- ii) **Overshadowing** - Overshadowing occurs where a development reduces the supply of light to a neighbour's property or garden. Development should be designed to minimise impacts upon the amenity and living conditions of neighbours. The extent of overshadowing and the severity of its impacts upon amenity will depend upon:

- a) The aspect of the development relative to the path and height of the sun;
- b) The size and massing of the new development;
- c) The position of the extension relative to neighbouring properties;
- d) The nature and use of the rooms affected by shadowing;
- e) Distance between buildings;
- f) The presence of existing features that obstruct light; and
- g) Ground levels.

To ensure overshadowing does not occur, the District Council will refer to the Building Research Establishment's guide to good practice 'site layout planning for daylight and sunlight' published in 1991. A 45 degree line is drawn from the closest edge of the nearest habitable window of the neighbouring property, in the direction of the proposed two (or higher) storey extension. Habitable rooms do not include bathrooms, hallways, utility rooms and circulation space. If there are two windows in a room the impact on the closer one would be considered. Figure 1 on page 8 provides illustrative advice in this respect.

- iii) **Overbearance** - A development would be considered overbearing if it dominated, overwhelmed, or had a visually intimidating impact on a neighbouring property. Overbearance can occur when an extension is positioned too close to a property boundary and has sufficient height and mass to dominate its neighbour. Figure 1 on page 8 provides illustrative advice in this respect.

■ Figure 1





Roofs

3.1.8 The roof form (type and angle of pitch) should match that of the original development, (particularly where a two storey extension is proposed) and that of the adjoining property. This contributes to the harmony of the building and avoids the long term maintenance problems associated with flat roofs.

Windows and doors

3.1.9 Proposed openings should align horizontally and vertically to those in the existing property, as should other details such as sills and lintels. These features must be of a similar or matching design and size. This ensures that the harmony of the building is not disrupted. Dormer windows should not be deeper than half the depth of the roof slope, and ensure that they have square proportions or a vertical emphasis. They should be in keeping in terms of scale within the building and the street-scene.

3.1.10 Windows and doors installed in an extension or as part of an alteration should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.

3.1.11 Local Character. An alteration or extension must consider the impact on the street scene. An alteration or extension must:

- i) Enhance and strengthen the local distinctiveness of an area, for example reflect the pattern of spacing of buildings;
- ii) Not normally project forward of the principal elevation, or that fronting the public domain. One exception would be the addition of a porch; and
- iii) Respect local styles and features to maintain local distinctiveness.

Nesting birds/bat roosts

3.1.12 The impact of the alteration or extension on protected and other species such as House Martins, Swallows and Swifts must be considered. It must also be ensured that suitable protection, conservation, enhancement or mitigation measures are undertaken, such as retention of entrance points to bat roosts or the provision of swift bricks or house martin boxes.

Attached garages

3.1.13 Proposals for attached garages will be considered as extensions.

3.2 Extensions in the Green Belt

3.2.1 Extensions in the Green Belt will be assessed against **BDP 4 which complements the NPPF. BDP4.4 c) provides the following size requirements:**

4.4 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 140m² ('original' dwelling plus extension(s)) provided that this scale of development has no adverse impact on the openness of the Green Belt;

3.2.2 For the assessment of residential extensions in the Green Belt **BDP 4.4 c)** is divided in to two separate elements:

- i) Either the extension is considered under the first part of the policy - a maximum 40% increase of the original dwelling;
OR
- ii) The total floor space increases to a maximum of 140m² made of the original floor space of the dwelling plus the floor space of the proposed extension.

3.2.3 In the same way that a 'proportionate addition' is not defined in the NPPF, the policy does not define how a 40% increase should be calculated. It can be calculated either as floor space or volume.

3.2.4 All measurement must be taken externally.

3.2.5 An assessment to consider the impact of the proposal on the openness of the Green Belt can be undertaken in a number of ways. Generally, openness is considered to be the absence of buildings and development. However, positioning, mass, height and topography can all have an impact on this; in addition openness is a wider concept than that of the visual impact of the development on the Green Belt.

3.3 Side Extensions

3.3.1 Side extensions will be required to be subordinate in size and prominence. To achieve this, extensions should be clearly set down from the ridge of the dwelling and set back from the principal elevation. Each application will be considered on its own merits to ensure that the design of the side extension is appropriate to that property and its surroundings.

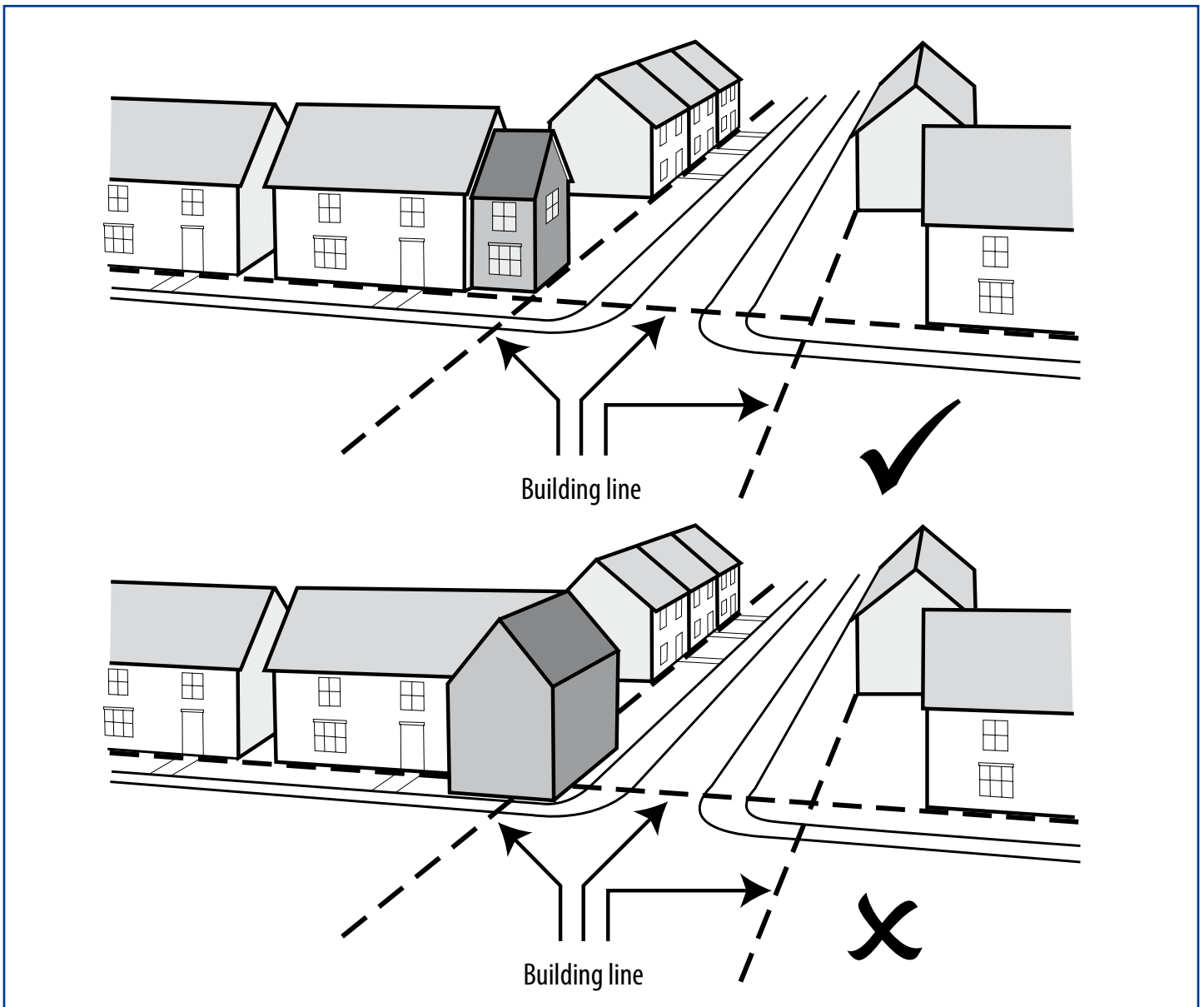
3.3.2 Extensions should reflect the proportions of the original building. To achieve this, an extension should be of a smaller and less substantial scale than the main building, as over-large

extensions can unbalance the proportion and harmony of the host building and can also have a detrimental effect on the street scene as a whole.

3.3.3 Side extensions to dwellings on corner plots must respect the building line of both street frontages, provide interest on both elevations thereby avoiding blank elevations where possible, and allow for effective surveillance.

3.3.4 In addition, side extensions to dwellings on corner plots should create adequate defensible space to provide a buffer between the public and private realm. This could be achieved by the use of appropriate boundary treatments.

■ Figure 2





3.4 Rear Extensions

3.4.1 Although the rears of dwellings are usually the least prominent in terms of public views, reduced visibility is not an excuse for poor design. The general objective remains to produce harmonious extensions which do not harm the amenity of neighbouring properties.

3.4.2 Two storey extension proposals should always match the main pitch of the roof.

3.5 Dormer Windows and Roof Extensions

3.5.1 Dormer windows and roof extensions can detract from the form and appearance of the original dwelling. Dormers which require planning permission will only be allowed where they are below the ridgeline and set away from the edges of the roof, subject to the character of the original dwelling. Dormers should preferably be pitched rather than flat roofed, and restricted in number and size in order to avoid a top heavy or unbalanced appearance.

3.6 Outbuildings

3.6.1 Outbuildings can include detached garages and sheds. Where outbuildings require planning permission they should be of an appropriate scale, orientation and design to ensure they do not compete with or detract from the dwelling they serve.

3.6.2 Proposals should respect the design, materials and form of the original building, its setting and the residential amenities of neighbours.

3.6.3 Outbuildings set forward of the principal elevation will not usually be appropriate as it may harm the character of the street scene.

3.7 Extensions in Conservation Areas

3.7.1 Where extensions to dwellings are proposed in Conservation Areas the impact on the character and setting of the Conservation Area as a whole must be considered, not just the street scene. Due to the nature of most Conservation Areas, particularly the rural ones, other spaces and elevations can be visible. Proposals must preserve or enhance the character and appearance of the Conservation Area in terms of new development.

3.7.2 A starting point for any scheme should be a Heritage Statement which identifies the character and significance of the Conservation Area and its setting, and the site in question. This should explain how the proposed scheme preserves or enhances the Conservation Area. Where there is a valid Conservation Area Appraisal and Management Plan, this should be referred to in the Heritage Statement.

3.7.3 Discussion should be had with the Conservation Officer prior to a planning application being submitted.

3.8 Extensions or works to Listed Buildings

3.8.1 A starting point for any potential works to a Listed Building should be a Heritage Statement. The Heritage Statement must identify the character and significance of the Listed Building and its setting; this should inform whether works or a proposed extension is appropriate in relation to the historic nature of the building. The Heritage Statement will also help guide appropriate application and type of materials as well as the form and massing of a potential extension.

3.8.2 Works to Listed Buildings including interior alterations will require Listed Building Consent. Discussion should be had with the Conservation Officer prior to a planning application being submitted.

3.9 Extensions to non-designated heritage assets

3.9.1 A non-designated heritage asset is an asset of historic value which is not designated nationally, but is of local importance. Please be aware the Council do not have a definitive list of non-designated heritage assets, they are often identified through the submission of planning applications. It should be noted that the Council will record non-designated assets as part of a living document, in line with the Local Heritage List Strategy which was adopted in 2016.

3.9.2 In weighing applications that affect non-designated heritage assets a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.



3.10 Extensions to previously converted rural buildings

3.10.1 Extensions will not normally be permitted as these detract from the plain, simple and utilitarian appearance of most rural buildings.

3.10.2 However where extensions to previously converted rural buildings are proposed they will be treated differently to extensions on purpose built dwellings. The original nature and character of the building should have been retained through the conversion, and it should be retained where extensions are proposed. Proposed extensions must reflect the form, character and utilitarian nature of the building and proposed openings should reflect the character and scale of the original building. Materials should match those of the existing building and where possible, thoughtfully selected reclaimed materials should be used to blend the old and new sections together.

3.10.3 Conservatories, including lantern style orangeries, will not be permitted as they do not reflect the character of the original building.

4. Residential Development - Creation of New Dwellings

“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.”

NPPF Paragraph 128

4.1 Types of new dwellings

4.1.1 This section sets out the various design requirements for new dwellings. In the Green Belt new dwellings will generally not be permitted (see table below).

Types of new dwellings

A) Replacement dwellings

- Replacement dwellings are considered by the Council as new dwellings.
- Replacement dwellings should be sited comfortably within the plot, follow the established building line and take into account the majority of key considerations in Section 4.2, where applicable.

B) Small scale development (1-9 dwellings)

- Small scale developments can have a great impact on the character and nature of an area. The key considerations (Section 4.2) will need to be taken into account as well as whether the development is part of a plot subdivision or back-land development.
- Plot subdivision will be resisted in most cases unless the plot is of sufficient size for both the existing and proposed development and no adverse impacts result from the development to either the proposed or existing dwelling(s). Plot subdivision which adversely impacts the grain of the existing area will be strongly resisted.
- Back land development or rear-garden development will be resisted, in line with Policy BDP19 (n).



Types of new dwellings *continued*

C) Large scale development (10 or more dwellings)

- Developments of 10 or more dwellings will require a considered approach taking into account the key considerations in (Section 4.2) as well as the detailed layout of the site and other requirements, such as for affordable housing and public open space.
- Affordable housing should be integrated into the site and should be indistinguishable from market housing to ensure a cohesive community is created.

D) Conversion of Rural Buildings to Residential Use

- These applications are treated differently to other types of new dwellings. Please see section 5 for more information.

4.2 Key considerations for all new dwellings

4.2.1 There are a number of principles which should be given due consideration to ensure that the design of new development is of a high standard. It is important that new housing is appropriately designed to deliver sustainable and attractive environments in Bromsgrove District for both new and existing residents.

4.2.2 It is advised that neighbours are consulted about the proposed development, and try to avoid impacting on neighbours privacy and amenity. The key considerations which should be taken into account for the development of all new dwellings, including replacement dwellings (unless otherwise stated) are detailed below.

Layout and surroundings

Layout

4.2.3 New residential developments will be required to be suitably sited taking into account neighbouring dwellings, the size of the plot and the orientation of the sun. New developments should be legible with easily identified landmark buildings and clear and accessible links through the site.

4.2.4 Urban block layouts provide an efficient template, with building fronts and entrances to public spaces and private backs to private spaces. Such layouts minimise the creation of unsupervised and unsafe public spaces and unsafe access routes. Where footpaths are essential to give access to the rear of properties, for example in some forms of terraced housing, they should meet the relevant Secured by Design standards.

Infill

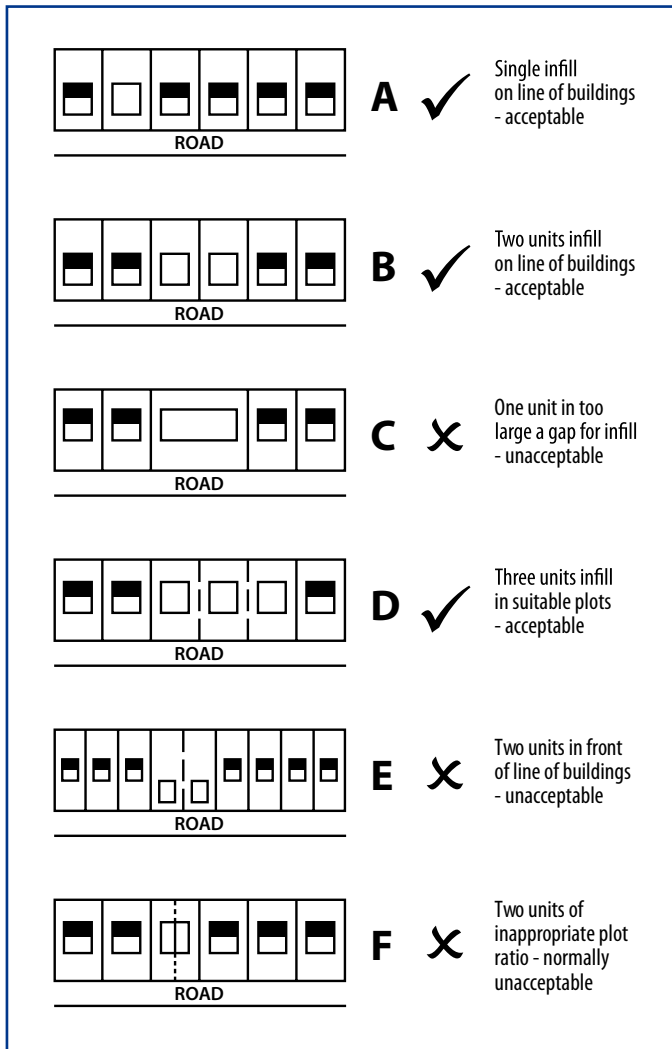
4.2.5 Where infill is proposed, it must reflect the existing urban form (see Figure 3 on page 14).

Adequate bin storage

4.2.6 Accessible refuse stores within new developments should be provided. The size of the bin storage will be influenced by that of the containers housed. In designing and positioning refuse stores it is important to balance the functional requirements of servicing against other design objectives.

4.2.7 Individual properties are required to place their bins 'at the kerbside' on refuse collection day to enable refuse lorries ease of access from the public highway. New developments should ensure there is adequate access for refuse collection vehicles, including turning space in cul-de-sac or key hole developments, or if not possible should provide a designated collection point.

■ Figure 3



4.2.8 Bin storage areas must be well designed and located in relation to properties. If the bin store is a gated under cover enclosure, it will require enough room to move bins through the opening and for easy access.

4.2.9 The access from the storage areas to the nearest vehicle access:

- Should be no further than 30 metres from the access roadway;
- Should be free from steps and kerbs;
- Should be smooth with a continuous finish;
- Should be level with a gradient falling away from the store of less than 1:14; and
- Should be a minimum width of 2 metres in the case of communal bins.

4.2.10 Communal bin stores will be required to:

- Provide suitable capacity to allow for correct number of bins (based on 240 litre per fortnight waste and 240 litre per fortnight recycling per dwelling for capacity);
- Use fewer communal bins of larger sizes where possible;
- Be fire proof in its construction;
- Avoid any negative impact on surveillance;
- Be designed to encourage the correct sorting and storing of recyclable and non-recyclable materials;
- Be conveniently located for use of all residents;
- Ideally have a locking mechanism that does not require keys; coded locks are preferable; and
- Ensure the provision does not have an impact on the amenity of occupiers, such as through consideration of underground storage. Where provision is above ground, storage units should be covered.

Local character and distinctiveness

4.2.11 New residential development should embody the particular characteristics of the built and natural environment in which it is located to provide a sense of place and identity. The use of particular materials and details in construction, the mix of building types, periods and styles, the street pattern and street furniture, the layout, scale and massing of buildings or arrangement and landscaping of spaces can be reflected in new development to ensure it retains and enhances the local character of an area.

4.2.12 Applicants should identify the features that make a place locally distinctive and then identify how the proposal can retain these features and enhance them. Parish Design Statements, made Neighbourhood Plans, or other locally produced guidance may provide a useful indication of local character for prospective applicants to consider. In addition, historic characterisation evidence and the Worcestershire Historic Environment Record (HER) provide a valuable resource for the identification of local heritage assets, which help define the many and varied elements of local distinctiveness across the District.

Views, vistas and the setting of heritage assets

4.2.13 The development should retain, enhance and/or create views, vistas, skylines, landmark buildings and other features such as trees, hedgerows and other landscape features where possible. Views of local landmarks should remain visible to enable legibility. Where appropriate, development can frame locally important views through the creation of boulevards which direct the eye or strategic gaps in development.



High Quality Design SPD

4.2.14 Proposals may have an impact on the wider setting of a heritage asset even if the asset is not located directly on or adjacent to a development site. Therefore where an important view or vista includes a heritage asset, a setting assessment should be carried out in line with Historic England guidance at <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

Topography

4.2.15 Developments should work with the contours of the site to ensure overlooking, overbearance and overshadowing are not issues.

Urban grain

4.2.16 The pattern of the arrangement of street blocks, plots and their buildings in a settlement should be continued through any new development to ensure proposals successfully integrate into the existing urban fabric.

Streetscape

4.2.17 Developments should fit suitably into the streetscape and follow the established building line. Materials for developments should reflect those in the existing vicinity in order to harmonise existing and new development. As a general rule all development should be positioned to front onto the street.

Corner plots

4.2.18 Where buildings are situated at corner plots they should wrap-around the corner or be double-fronted to ensure that both sides front onto the street make a positive contribution to the street scene and surveillance is provided to both frontages.

Connectivity

Safe and convenient movement

4.2.19 An area must have a variety of pleasant, convenient and safe routes through it. New developments should offer a choice of routes to, from and through the site, with a preference towards walking and cycling. Developments which are easy to navigate and are well connected should in turn make residents and visitors feel safe and secure.

4.2.20 The needs of pedestrians and cyclists should be put before the needs of vehicles with appropriate traffic calming measures that are integral to the overall design. All routes should be designed having regard to the needs of all people including the mobility and visually impaired, in order to promote greater activity, and so increase the surveillance.

4.2.21 Footpaths and cycle paths should be as direct as possible and should be more convenient than vehicle routes. Paths must be well-lit, short, straight and not run at the side or rear of properties. Integrated routes are preferable, that is those that run alongside vehicle routes but which are distinct from the highway, and are well signposted.

4.2.22 Residential developments must carefully consider designing for through movement in order to provide an appropriate degree of connectivity. Where included, pedestrian through-routes must be integrated into the local movement network so that they connect to locations where residents want to go and as such are well-used. Providing too many footpaths dilutes pedestrian activity and may increase the fear of crime along these routes, discouraging residents from choosing to walk or cycle. Where through-footpaths are required within a development they must be desired/well-used, short, wide, well-lit and subject to good surveillance from the active rooms of neighbouring properties. They must not run at the side or rear of properties and must not contain possible hiding places.

4.2.23 How networks, including Green Infrastructure networks, connect locally and more widely, and the way developments, routes and open spaces relate to one another should be designed into new development.

Legibility

4.2.24 The development will enhance the legibility of the District through the appropriate design and siting of distinctive corner buildings, landmarks, gateways and focal points at key junctions and other important locations; and by the protection and enhancement of key vistas that create visual links between places.

Cycle storage

4.2.25 Adequate cycle storage for residents of the property of an appropriate size should be included as part of the development. These standards are set out by Worcestershire County Council Highways Department. Please refer to their specific requirements regarding cycle storage.

4.2.26 In addition to these standards, where communal cycle storage for a block of flats or similar is provided external to the building then this must be as close to the building as possible, subject to effective surveillance, well-lit and constructed using robust materials to a resilient design. Communal cycle storage may also be provided within the building itself. Access should only be provided to residents of the building.

Electric car charging points

4.2.27 Developments should consider the inclusion of electric car charging points and are encouraged to be incorporated as part of the scheme (**in line with BDP16**).

Road Design

4.2.28 Surface materials should be selected that are robust, suitable for the use, easy to maintain and that respect the character of the area.

Amenity

Private amenity space and Spacing Standards

4.2.29 Private amenity space will be required to be of a usable size, with a minimum of 70sqm for dwellings. Amenity space in the canopy of trees or on a steep gradient will not be included within the 70sqm requirement. A more flexible approach will be used for communal amenity space for flats. Rear private amenity space will usually be expected to be a minimum of 10.5 metres in length for a two storey dwelling. This applies independently of the minimum amenity space requirement. Private amenity space will be expected to be suitably sited and in scale with the plot and surrounding buildings and reflect existing local density.

4.2.30 Gardens should be located to the rear of buildings, and wherever possible, back onto other gardens or private spaces to reduce the risk of unauthorised access. Where gardens back onto public space then the use of appropriate boundary treatments and gates to reduce the risk of crime and anti-social behaviour is vital.

4.2.31 21m will be required between rear dwelling windows that directly face each other. Where there is a difference in gradient further distance may be required (see Figure 4 below).

4.2.32 Balconies will only be acceptable where it can be demonstrated that the privacy of adjacent residents can be safeguarded by ensuring that there is no direct overlooking of windows or, at close quarters, the rear gardens of adjacent dwellings.

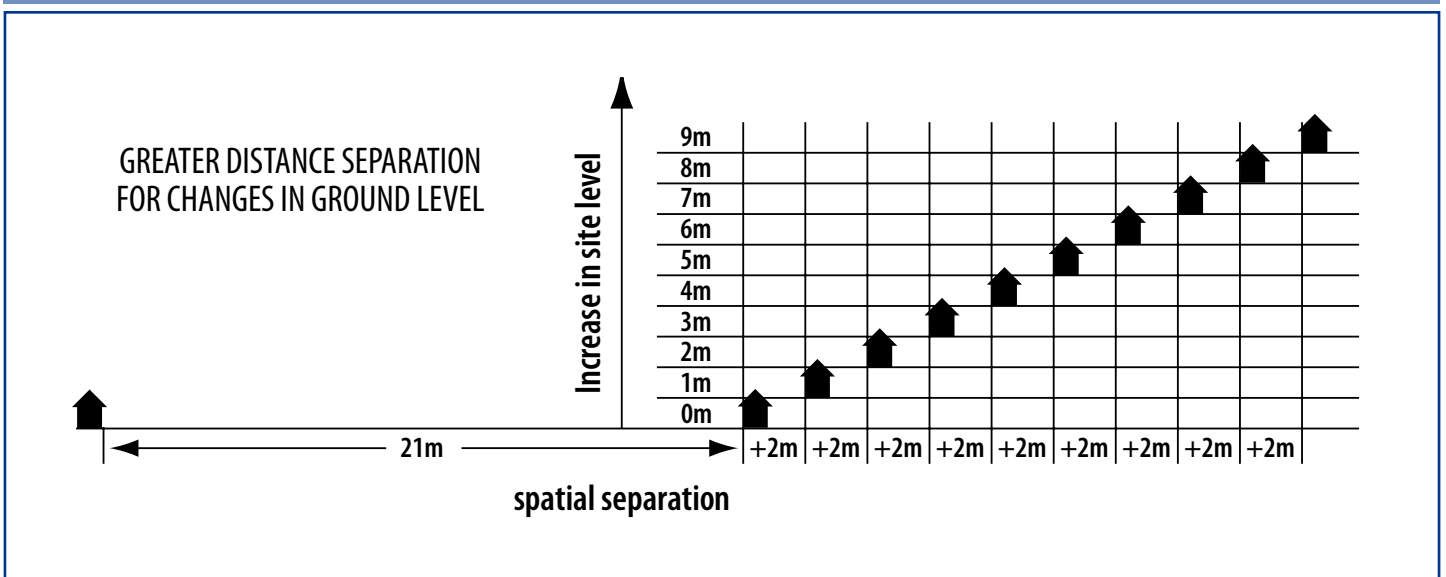
Public open space

4.2.33 For larger residential development open space should be located in a prominent position which maximises surveillance from surrounding development, should be easily accessible from the whole development and be of a sufficient size to provide a variety of uses. Small 'pocket' parks will not be permitted. Public space boundary treatments should allow clear views into and out of the site. (For more information on the design of Open Space please see the Open Space SPD).

4.2.34 Play areas for younger children should be designed so that they are safe locations for children to occupy. Whilst play areas should be close enough to properties to allow for surveillance.

4.2.35 Layouts should respond to existing local green infrastructure, seeking to maintain and enhance ecological connectivity both within site and in the wider context. Public open space should be permeable to wildlife and well connected to surrounding ecological networks where appropriate.

■ Figure 4





Street Furniture

4.2.36 For larger residential development there should be a co-ordinated approach to the provision of all street furniture and this should be appropriately sited and designed to reinforce the character and identity of the area and to ensure it benefits from surveillance, whilst being functional for all users.

Car Parking

4.2.37 Where car parking within a residential building curtilage is provided, measures should be taken to mitigate its impact on the building by locating the garage or car-port alongside the house and set back from the building-line. Where garages are provided, the entrances should be located towards the front of dwellings where they can easily be seen and accessible. Flat roofs should be avoided. Incorporating garages into the main form of the dwellings should be avoided.

4.2.38 In appropriate circumstances consideration should be given to on street parking in designated parking bays.

4.2.39 Where courtyard parking is unavoidable, it should be located to the rear of development and be well lit, overlooked by adjoining properties and in general not include more than 10 spaces. The entrance(s) to the courtyard between buildings or through an archway needs to respect the street frontage and avoid harming the continuity of the street.

4.2.40 Parking courtyards should be clearly defined as private space using symbolic boundary treatment, and where appropriate the use of gates. Where gates are provided they should make a positive contribution to the building or street scene and should be set back from the highway.

4.2.41 Where shared driveways are proposed, they should be designed to provide sufficient width to allow cars from both properties to be parked, car doors to be opened (without touching the other car) and room to allow wheelie bins to be moved past the vehicle.

4.2.42 Parking should be designed to adapt the users preferences therefore where possible, should be in close proximity to their property, with a direct line of sight.

Boundary treatments

4.2.43 Boundary treatments should utilise existing features and vegetation, such as hedgerows and mature trees.

4.2.44 Buildings and structures should be arranged to clearly demonstrate which areas are private and public, with a range of physical or symbolic boundary treatments used, depending on the context. Boundary treatments may include symbolic barriers, such as subtle changes in paving material, or physical barriers as such as gates, fences, walls and hedges.

4.2.45 The choice of boundary treatments should relate to the wider physical, ecological and social context of the surrounding environment and seek to make a positive contribution to the character of the area and the building(s).

4.2.46 Where they are adjacent to public spaces, boundary treatments should allow clear views into and out of the site and not hinder vision on the highway, particularly at road junctions.

4.2.47 Boundary treatments should comply with the Secured by Design guidance. 'Aggressive' boundary treatments (such as razor-wire, barbed wire or bare metal palisade fencing with spiked pales) will be resisted in a residential setting. Careful attention must be paid to the design and construction of boundary treatments in order to avoid the creation of climbing aids.

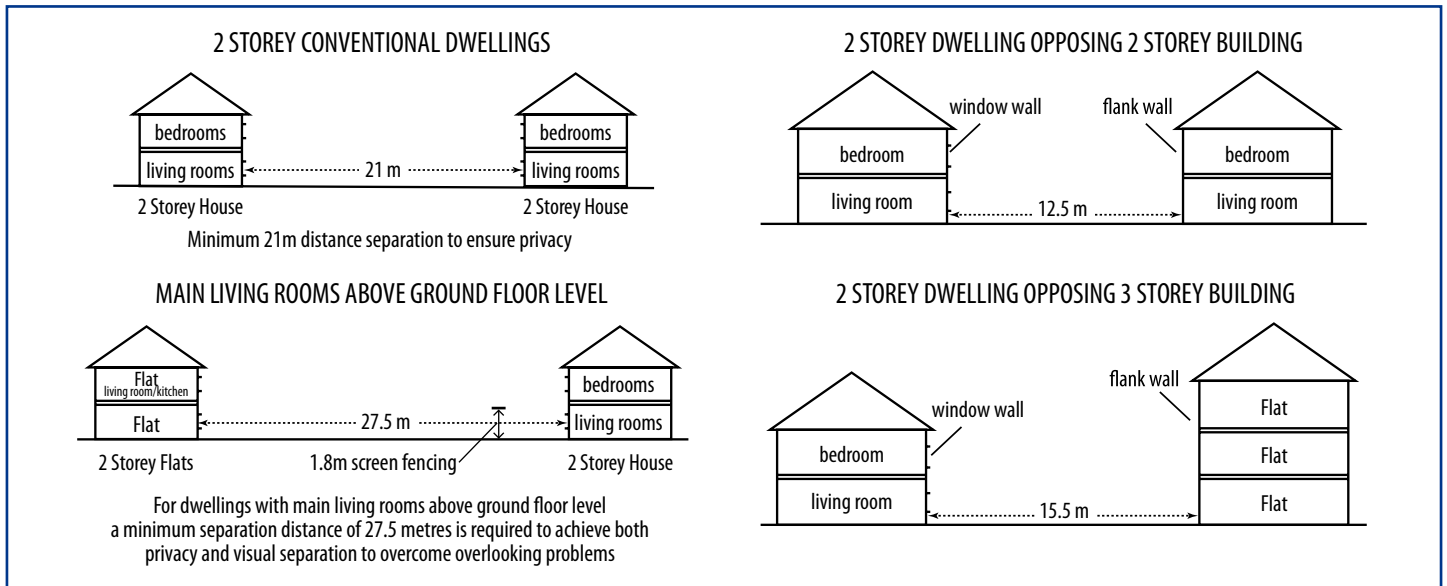
Overlooking

4.2.48 Overlooking may be a problem if new development allows views into the private amenity (including outdoor space) or living space of a neighbouring property. The impact of overlooking is affected by a number of factors including in particular:

- a) The distance between buildings;
- b) The presence of openings;
- c) Whether properties face each other directly or are offset;
- d) Changes in levels across a site and relative to neighbouring properties; and
- e) The types and use of rooms facing each other.

4.2.49 A minimum separation distance of 21 metres will be required between opposing faces to achieve a degree of privacy between habitable rooms of two-storey dwellings. Habitable rooms do not include bathrooms, hallways, utility rooms and circulation space. Where housing is proposed with main living rooms above ground floor level it is necessary to have a greater separation distance of 27.5 metres between opposing faces to achieve both privacy and adequate visual separation. Care must be taken when windows overlook adjacent flank walls to ensure overshadowing and any overbearance is avoided. Where a two storey dwelling faces a flank wall on a two storey building, a minimum separation distance of 12.5 metres will be required.

■ Figure 5



Where a two storey dwelling faces a flank wall of a three storey building, a separation distance of 15.5 meters will be required. Where there are changes in the ground level between dwellings, applications will need to take account of this and minimum separation distances increased where necessary. (see Figure 5 above).

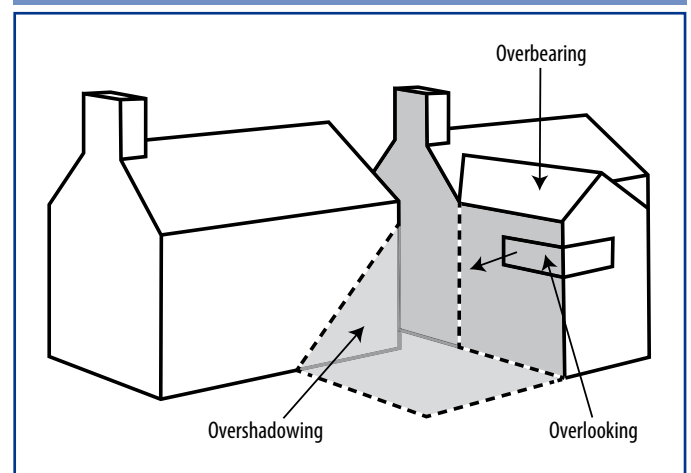
Overshadowing

4.2.50 Overshadowing occurs where a development reduces the supply of light to a neighbour's property or garden. Developments should be designed to minimise impacts upon the amenity and living conditions of neighbours.

4.2.51 The extent of overshadowing and the severity of its impacts upon amenity will depend upon:

- The aspect of the development relative to the path and height of the sun;
- The size of the new development;
- The position of dwelling(s) relative to neighbouring properties;
- The nature and use of the rooms affected by shadowing;
- The presence of existing features that obstruct light;
- Ground levels; and
- Distance between buildings

■ Figure 6



Overbearing

4.2.52 Where new dwellings are located and are of sufficient height and mass to dominate neighbouring dwellings, this will not be acceptable.

Noise

4.2.53 Disturbance caused by noise may potentially be an issue where neighbouring uses and associated patterns of activity are dissimilar. Accordingly, careful consideration should be given to the siting of residential development where disturbance may be caused by established lawful uses, particularly in the late evening and early morning.



Lighting

4.2.54 Artificial light sources may cause significant harm to residential developments and wildlife. New street lights and security lighting within developments should be positioned in locations where they do not shine directly in dwelling windows, but provide sufficient lighting for safety and security on the street.

4.2.55 The type of lighting selected should be relevant to the local context, character and use of the area and minimise the impact of light pollution as well as being as energy efficient as possible.

4.2.56 Care should be taken to ensure that landscaping, tree planting and lighting schemes take each other into account and in particular work to mitigate the effects of seasonal variations. The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development.

4.2.57 There should be a clear strategy, addressing relevant standards, for the provision of lighting within an area in support of the primary movement patterns. The decision to light or not light public spaces should be well thought through.

Trees, hedges and landscaping

4.2.58 The Council will expect to see important trees, hedges and historic boundary features retained through incorporating these features into the design and layout of developments. Existing trees and hedges can provide maturity to a development and may be a fundamental contributor to the established character of the area. An arboriculture report can help identify the health and amenity value of trees on the site and so inform this process.

4.2.59 Landscaping should be used to improve the attractiveness of an area, support biodiversity enhancement and positively protect property. Where trees and shrubs are planted, care must be taken to ensure that they do not obstruct visibility into or out of public areas. Where they are planted alongside footpaths or cycle ways they should not obscure views along the length of the route or provide for hiding places. It is essential therefore that appropriate species are selected and necessary maintenance regimes are set in place.

4.2.60 Defensive planting such as thorny or spiny shrub species should be used to help protect vulnerable boundaries and buildings.

4.2.61 Landscaping must be carefully sited and designed so as not to obscure existing CCTV, lighting, signage, windows and entrances.

4.2.62 Trees should not be planted in places which will assist as climbing aids into or onto properties.

Sustainability

Energy conservation and efficiency

4.2.63 Development should incorporate measures within its design, layout and orientation, in the use of materials and operation of services that promote energy efficiency and support energy conservation. Low carbon energy sources should be incorporated where appropriate. Energy storage should be considered to increase the efficiency of renewables where applicable. As properties become increasingly well insulated, heated and air-tight adequate ventilation, shading and cooling also need to be considered, while maintaining energy conservation.

Habitats

4.2.64 The opportunities to incorporate and enhance wildlife habitat features and species should be taken, particularly those identified as priorities by the Worcestershire Biodiversity Partnership and in the Worcestershire Green Infrastructure Strategy, both within the layout of the proposal and through sympathetic construction techniques. This ensures connectivity and sufficient suitable habitats to support viable and sustainable populations.

Resources

4.2.65 Developments should seek to reduce the volume of resources consumed and should help to promote more sustainable lifestyles. Consideration should be given to water efficiency and lifecycle costs of materials.

Passive Solar Design

4.2.66 Sensitive layout and orientation of buildings can have a considerable impact on the amount of sunlight and overshadowing within a development. Good building design should seek to trap the heat generated by the sun in order to reduce consumption of conventional fuels. Layouts which are planned with the orientation of the sun in mind can be described as having Passive Solar Design. Solar gain can be beneficial in providing heat but can also result in overheating; therefore layouts should be carefully designed.



High Quality Design SPD

Safety and Security

Public and private space

4.2.67 It is important to clearly define the function of each space within a development. Public, private and communal spaces should be demarked with appropriate physical or symbolic boundary treatments. The type and design of these should be informed by the local context.

4.2.68 The development of buildings containing multiple dwellings will often create communal entrances and interior communal spaces which can be particularly vulnerable to crime. As the number of dwellings served by a single entrance or communal space increases, the ability of residents to monitor and control these areas decreases. To reduce the risk of crime and anti-social behaviour these developments should observe the following:

- Communal entrances meet physical security and access control standards as recommended by Secured by Design
- In larger buildings, communal areas are compartmentalised to restrict movement by unwanted persons from one part of the building to another, for example by using secondary access control doorsets and controlled lift access

■ Secured by Design

The Council supports the Secured by Design Scheme; applicants are expected to meet those standards wherever possible. Further information can be found at <https://www.securedbydesign.com>

Windows and external doors, including roof lights and garage doors, installed in a residential development should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.

Surveillance

4.2.69 Surveillance from dwellings should be ensured to provide safe and secure places to live. Blank walls along road ways, footpaths and cycle ways can create unwelcoming and oppressive routes. Siting dwellings which overlook or open onto routes through and between sites can reduce antisocial behaviour, littering and crime.

4.2.70 As far as possible, pedestrian and cycle routes should be overlooked by development to allow for surveillance.

4.2.71 Surveillance should be incorporated quite easily into a development scheme through a number of design features which should ensure:

- i. careful consideration is given to the design of corner plots to ensure that they make a positive contribution to the street-scene on both sides and provide sufficient surveillance;
- ii. entrances to the property are overlooked;
- iii. flatted developments maximise front doors onto the street and ground floor flats should generally have separate entrances as this minimises the shared access space;
- iv. the primary access to buildings is from the public realm with well-defined entrances at frequent intervals.



4.3 New dwellings within the setting of designated and non-designated heritage assets

4.3.1 New residential developments within the setting of a designated heritage asset will need to pay special attention to the street scene and must preserve or enhance the character of the area.

4.3.2 Where new residential developments are proposed within the setting of a designated heritage asset, great care will need to be had to ensure the setting of the heritage asset is sustained and enhanced. Appropriate siting and design of the new development will need to be considered, as well as materials, layout and appropriateness.

4.3.3 New residential developments which are located within the setting of a non-designated heritage asset will need to be appropriately designed to not detract from the setting of that asset. A non-designated heritage asset is an asset of historic value which is not designated nationally, but is of local importance. Please be aware the Council do not have a definitive list of non-designated heritage assets, they are often identified through the submission of planning applications.

4.3.4 A starting point for any scheme with an impact on a heritage asset should be a Heritage Statement which identifies the character and significance of the heritage asset and its setting, as well as the site in question. This should explain how the proposed scheme preserves or enhances the heritage asset. Where there are any relevant documents to provide information on the asset, such as a Conservation Area Appraisal and Management Plan, these should be referred to in the Heritage Statement.

4.3.5 Where a proposal is within or close to a site of archaeological interest, advice should be sought from Worcestershire County Council Archaeological Service on any survey or recording work that may be needed to further knowledge of the site.

■ Please note

Proposals within the setting of a heritage asset should be discussed with the Conservation Officer prior to applications being submitted.

5. Conversion of Rural Buildings to Residential Use

5.1 Converting buildings to residential use allows the survival of the character and form of existing buildings while giving them a new lease of life. A well-designed conversion should retain the original, utilitarian character of the building, allowing ample use of the existing structure. Buildings which have become so derelict that they could be brought back into use only by complete or substantial reconstruction fall outside the scope of this guidance.

5.2 Factors to consider include:

- The building should have some intrinsic conservation value and should be suitable for conversion. The new use should conserve the form and character particularly where buildings are listed, are of listable quality or form part of a particularly fine group of traditional buildings, or if a lone building is of traditional form or character.
- The building should be large enough for the proposed use without the need for significant enlargement or alteration. Extensions will not normally be permitted as these would detract from the plain, simple and utilitarian appearance of most rural buildings.
- The building should be structurally sound and capable of conversion without the need for major rebuilding.
- The building should have safe and adequate access to a public road and its conversion should not materially increase traffic on narrow country lanes leading to a demand for their improvement.
- The re-use should not lead to the provision, improvement, renewal or extension of utility services which would be damaging to the landscape.

5.3 Where planning permission is granted for the conversion of buildings to a dwelling, the residential use and any associated use rights will only extend over the land within the approved curtilage. This is usually denoted by the red line on the approved site plan.

5.4 Where a building is of archaeological interest, is within or close to a site of archaeological interest, advice should be sought from Worcestershire County Council Archaeological Service on any survey or recording work that may be needed to further knowledge of the site. This may also apply to some farmsteads, which have been settled for many years and contain a wealth of historic interest.

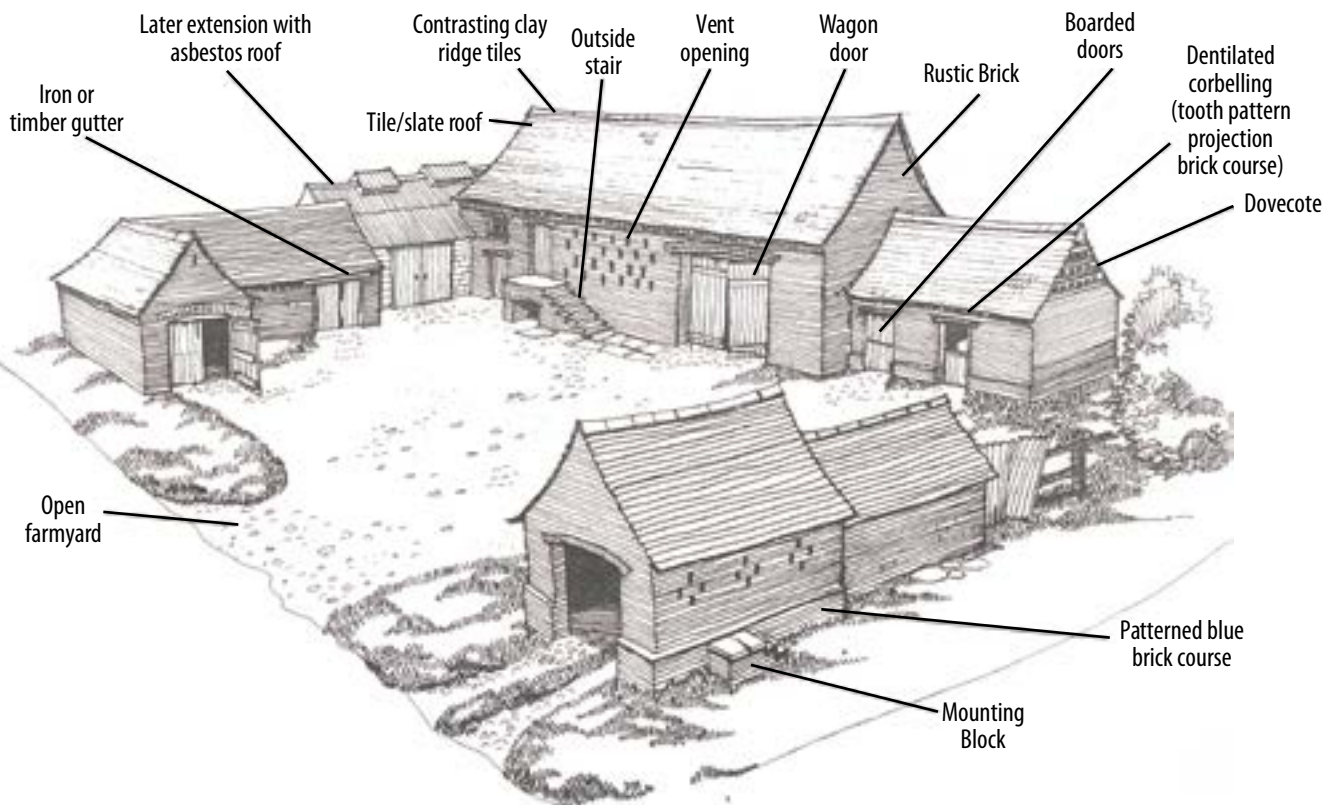
5.5 Agricultural buildings are characterised by large unbroken roof slopes and few window and door openings. Large unbroken roof slopes should be respected as they can be seen from some distance, so new opening would normally be opposed, and dormers and similar structures will not be allowed. New windows and door openings should preferably be located on the inside elevations away from public view. Window and door frames should be painted/stained a dark colour to decrease visual impact and should be recessed behind the main face of the brickwork.

5.6 On less visible slopes flush fitting roof lights may be possible. An alternative to roof lights may be a suitable opening in the gable end to supplement light levels. Existing openings should be utilised and new openings will be resisted. Where new openings are deemed necessary, they must be in keeping with the character of the original building and be located on the inside elevation, away from public view.

■ **Figure 7**

BEFORE

Typical Traditional Worcestershire Barn and Outbuildings



Main Characteristics

Simple Shapes

Limited number of openings - solid dominates over void

Absence of over-elaboration - details kept simple at eaves, verges and openings

Simple and open agricultural setting

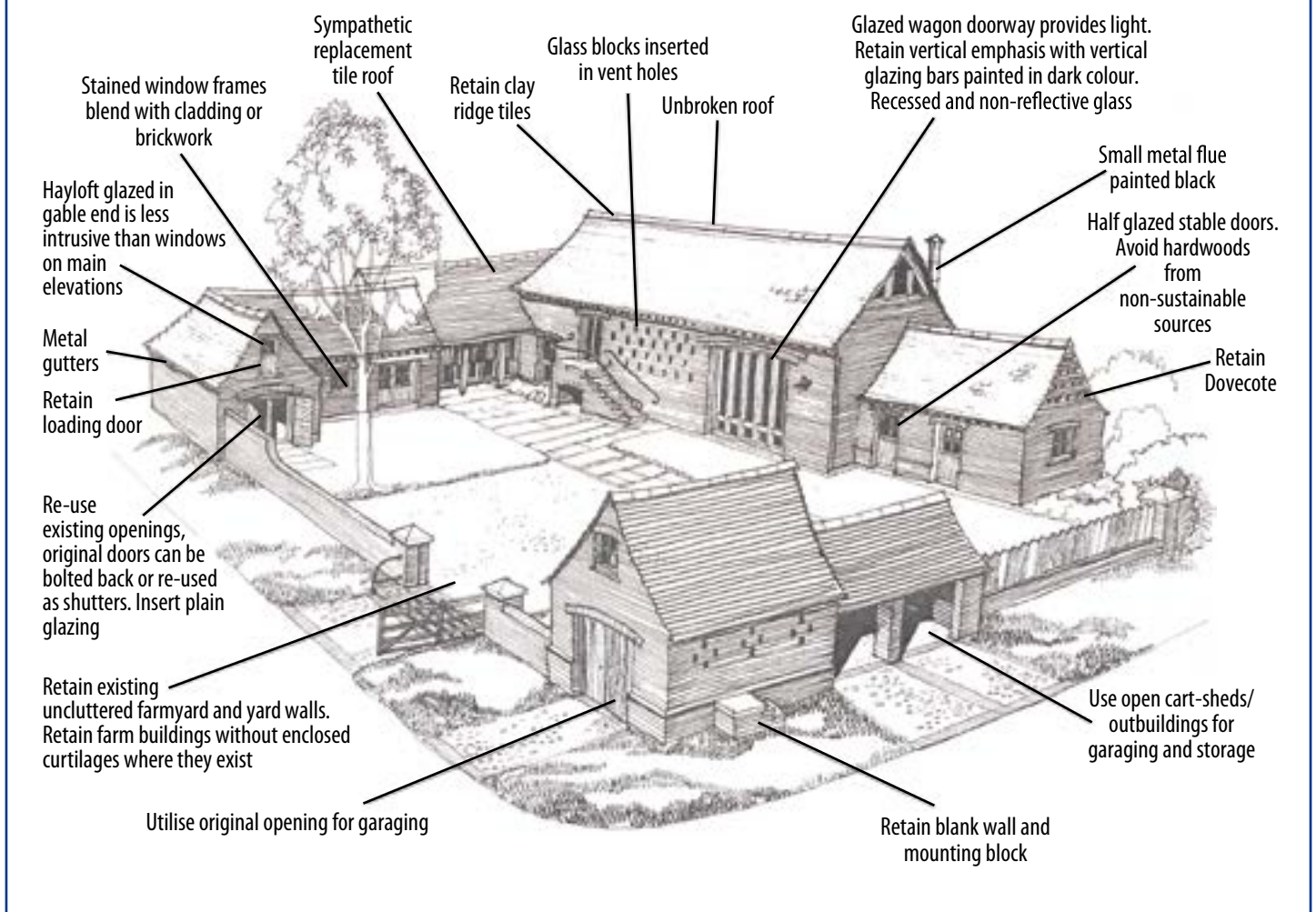
5.7 Existing features of interest should be retained and incorporated in the design of the conversion. This includes such items as external steps, lanterns, dovecotes, ventilation slits, barn door openings and lean-tos etc. Proposals should seek to enhance the building or group of buildings where there have been previous unsympathetic additions, to an otherwise attractive buildings, the Council will seek their removal.

5.8 Wagon arches should be fully glazed and if possible the great doors should be retained and sealed. If glazing is used, the vertical dimensions should be emphasised with no obvious signs that the conversion forms two floor levels. The glazing of wagon arches can often provide illumination to the main internal spaces of the building and borrowed light to other rooms. This may also apply to large doorways which were a feature of threshing bays and essential as part of the winnowing process.

■ Figure 8

A PREFERRED SCHEME

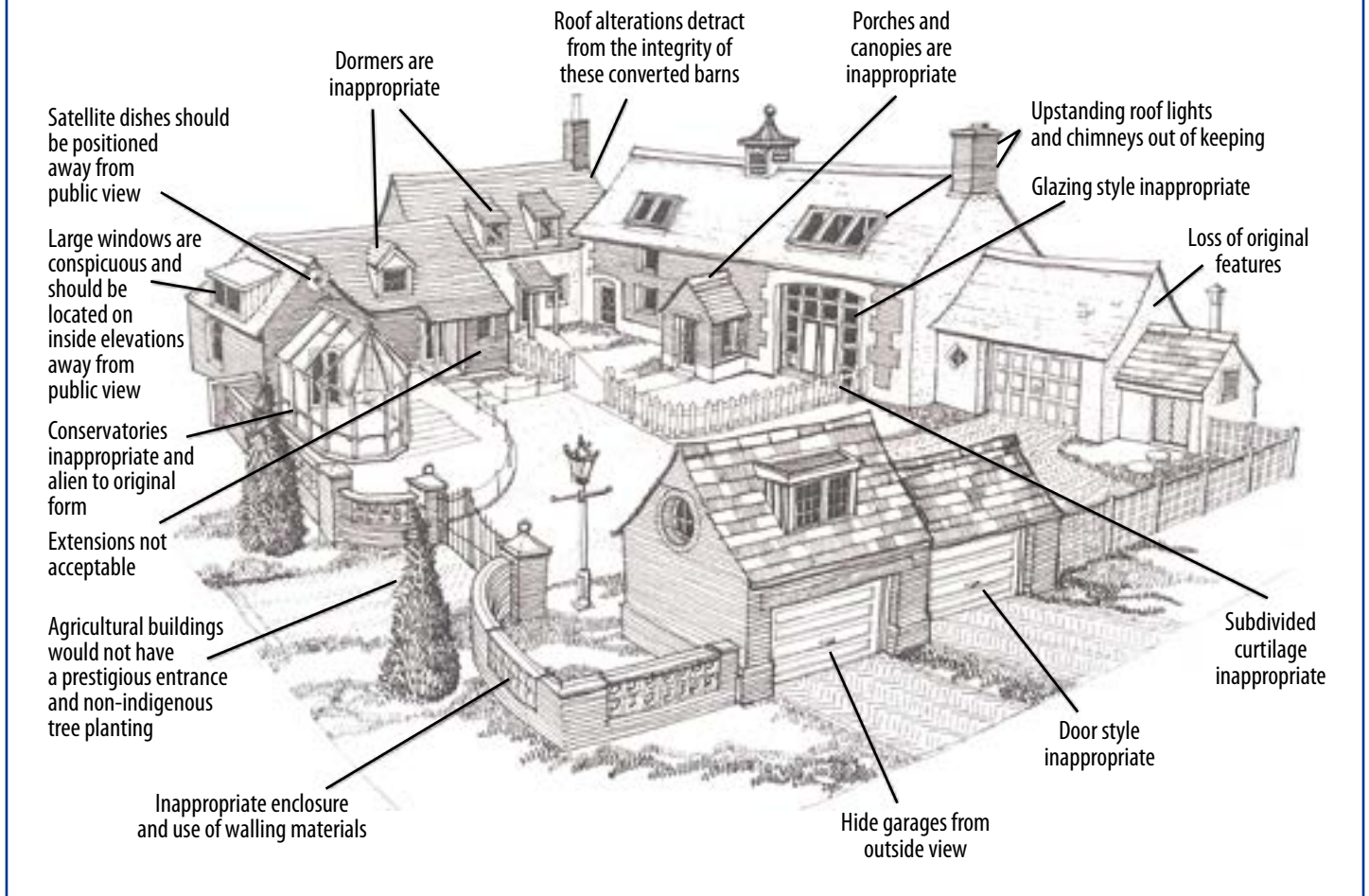
Sympathetic conversion scheme retaining simple, agricultural character of buildings



■ Figure 9

UNACCEPTABLE CONVERSION MISTAKES

Unsympathetic conversion incorporating urbanising features



5.9 Rain was often allowed to run directly off the eaves of farm buildings. Any gutters and downpipes in rural conversions should therefore be discrete, of a dark colour and made of metal.

5.10 Rebuilding should be kept to a minimum and where considered to be required must be quantified on the submitted drawings. Existing materials should be re-used or new/reclaimed traditional materials incorporated that blend harmoniously with old.

5.11 Chimney stacks are inappropriate in rural conversions since they damage the character of a traditional rural building by introducing domesticity. Alternative treatments such as a small metal flue may be acceptable provided that they are sensitively positioned. Small balanced flues are acceptable for oil or gas fired heating but fuel tanks sited to comply with Health and Safety Regulations can be intrusive features and will need to be sensitively sited.

5.12 Providing adequate private parking for converted buildings can be challenging. Parking should be located away from the main façade of the building, either within a traditional yard area or within other agricultural buildings in the vicinity.



5.13 In rural conversions proposed new areas of hardstanding for parking will be resisted, as this will both impact on the rural nature and character of the building and wider area. The re-use of existing stone, setts or stone blocks is encouraged. These are more likely to be in keeping with the farm building.

5.14 Traditional farm buildings are sited with yards or in open fields. To avoid domesticity, the curtilage of a converted farm building should remain open and uncluttered. There may be scope for private areas, but these should be screened with hedging and walls of old bricks.

5.15 Where residential use is proposed, garaging requirements should be carefully considered. It may prove possible to incorporate an internal garage, perhaps by making use of an existing opening in a lean-to. Alternatively it may be possible to use an ancillary building such as an open cart shed for garaging.

5.16 Regard will be had for the materials used to create an access. No access will be permitted to run over open fields where this would be especially visible in the open countryside. Where an agricultural building is part of a farmstead, use of the existing access will be required.

5.17 In rural conversions tall brick walls, elaborate gates and gate piers at the entrance to the conversion will not be permitted, as this will not reflect the agricultural roots of the building(s).

5.18 Planting will not be accepted as an excuse for poor design and disregard to the original building.

5.19 Old farm buildings are often used as roosts for owls or bats and provide valuable habitats for other birds and animals. A Preliminary Ecological Assessment (PEA) is likely to be required to identify the ecological potential of the site. PEAs are simple surveys that help to inform planning applications. Further specialist survey work may then be needed for specific species identified. Survey work will need to be undertaken by an appropriately qualified ecologist at an appropriate time of year. Where the nature conservation interest is considerable, mitigation measures will be required or permission could be refused. In all cases there will be potential for biodiversity enhancement and the council will expect applicants to heed the guidance contained in the NPPF.

5.20 Where consent is given for the conversion of a traditional rural building, it is likely that the Council will include a condition to remove Permitted Development Rights for extensions and alterations, to ensure the building remains rural in character.

5.21 Windows and external doors, including roof lights and garage doors, installed in a rural building conversion should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.

■ Further Guidance

Further Guidance on the Conversion of Rural Buildings

More detailed guidance is available for proposals concerning the conversion of rural buildings from Historic England, as well as more locally specific advice from Worcestershire County Council.

In particular, applicants should make use of guidance contained in Historic England's 'Adapting Traditional Farm Buildings (Oct 2017)' and the suite of guidance documents concerning historic farmstead characterisation, including the summary for Bromsgrove District, produced by Worcestershire County Council at http://www.worcestershire.gov.uk/info/20230/archive_and_archaeology_projects/1023/historic_farmstead_characterisation



6. Non - Residential Development

6.1 Key considerations

6.1.1 Non-residential development is defined as all types of Use Classes except those under Class C of the Use Class Order 2016 (or subsequent).

6.1.2 Guidance is provided for the following types of non-residential development:

- Retail units;
- Commercial/Industrial buildings;
- Agricultural buildings; and
- Equestrian development.
- Shopfronts;
- Change of use;

6.1.3 All non-residential development must take account of the following considerations:

- BREEAM;
- Impact on neighbouring amenity;
- Local character; and
- Crime prevention and community safety

6.1.4 BREEAM - BREEAM is the Building Research Establishment's Environmental Assessment Method. **A BREEAM 'very good' standard is required for all non-residential development, as per BDP19.1 d). Where this requirement affects the viability of the scheme justification must be provided for not fully meeting this requirement. The BREEAM 'very good' standard should be met by all other non-residential developments, where the development is for a new building or replacement building, regardless of their size, unless the development can be undertaken via permitted development or prior notification, or a strong Permitted Development fall back exists. The requirement to meet BREEAM 'very good' standard is regardless of whether there is a net increase in floor space. A condition is likely to be attached to permissions to ensure developments meet the requirements in accordance with BDP19.1 d) and BPD23.1 b). For more information, please visit the BREEAM website: www.breeam.com**

Maximum points will be required to be scored in the Water category as per BDP23.1 b). Change of use will potentially be required to meet the BREEAM 'very good' standard, but this is at the Council's discretion. At the Council's discretion, the BREEAM 'very good' standard will not normally be required for the following developments:

- Shopfronts;
- Extensions to non-residential developments;
- Agricultural buildings;
- Equestrian buildings; and
- Outdoor space including associated facilities.

6.1.5 Impact on neighbouring amenity - Developments should not impact on neighbouring amenity of buildings, regardless of their use. This includes through overbearance, overshadowing and overlooking nearby buildings and developments.

6.1.6 Local character - Developments should respect and enhance the local character through the use of appropriate materials, siting, scale and massing.

6.1.7 Heritage assets - Non-residential developments within the setting of a heritage asset will need to pay attention to the heritage asset as a whole and must preserve or enhance the character of the area. New development should not adversely impact upon the setting of heritage assets, notably Listed Buildings and Conservation Areas, where there is a statutory requirement to consider the impact on setting. The setting of non-designated heritage assets must also be considered. A non-designated heritage asset is an asset of historic value which is not designated nationally, but is of local importance. Please be aware the Council do not have a definitive list of non-designated heritage assets, they are often identified through the submission of planning applications.

6.1.8 As with any development near heritage assets, designated or not, applicants need to use an appropriate Heritage Statement as a starting point, and they also need to carry out a setting assessment using Historic England guidance (for more information see the Historic England website: <https://historicengland.org.uk/advice/hpg/has/setting/>)

6.1.9 Crime prevention & community safety - non-residential developments should design out vulnerability to crime by incorporating the principles, concepts and physical security standards of the Secured by Design award scheme.



High Quality Design SPD

■ Please note

Proposals within the setting of a heritage asset should be discussed with the Conservation Officer prior to applications being submitted.

6.2 Commercial Development

6.2.1 Better designed buildings, landscapes, townscapes and places contribute towards more productive employees, a healthier and happier workforce, and communities are more likely to be committed to the maintenance and improvement of their surroundings.

6.2.2 Planning permission will only be granted for new commercial and industrial buildings which are of high quality design and are appropriate for their use and context. Development will not be permitted where it is considered to have a detrimental impact on the townscape or landscape character. The following considerations should be taken into account when designing a commercial/industrial scheme:

- Scale and form;
- Lighting;
- Access;
- Landscaping;
- Noise;
- Boundary treatments;
- Parking.
- Surveillance;
- Layout;
- Materials;
- Biodiversity enhancement;
- Odour;
- Bin storage; and

6.2.3 Scale and form - The proposed development should be in scale with surrounding developments and not be visually intrusive due to its scale and massing. Where possible large buildings should minimise their impact through having low building heights and use of a curved roof.

6.2.4 Surveillance - All new commercial development will be expected to create continuous active frontages and minimise blank walls and fencing. There should be a clear relationship between any new and existing development and the building should be well integrated into its surroundings. Formal surveillance may be appropriate via a monitored CCTV system and/or on-site security staff.

6.2.5 Lighting - The type of lighting selected should be relevant to the local context, character and use of the commercial development and minimise the impact of light pollution as well as being as energy efficient as possible.

6.2.6 Care should be taken to ensure that landscaping, tree planting and lighting schemes take each other into account and in particular work to mitigate the effects of seasonal variations. The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development.

6.2.7 There should be a clear strategy for the provision of lighting within an area in support of the primary movement patterns. The decision to light or not light public spaces should be well thought through.

6.2.8 Layout - The relationship between the proposed development and existing buildings and features in the area should be considered when designing the proposal or determining the location on the site.

6.2.9 Access - Entrances should be directly visible and easily accessible. Access and circulation should contribute to a network of direct, connected and visible routes within and beyond the site.

6.2.10 Materials - Commercial developments should be constructed to produce a visually attractive scheme. Materials, building methods and details in the design should aim to enhance the local distinctiveness of an area. Where there is no precedent set for specific types of materials to be used, a high quality area with a distinct character should be created, either from traditional or more modern materials. It is the degree to which any material is appropriate to its surroundings and its function that should determine its use.

6.2.11 Landscaping - A balance of both hard and soft landscaping should be included to ensure that attractive amenity spaces are enhanced and their use, both night and day, encouraged. Landscaping can also include appropriate screening to help reduce noise, light and air pollution.

6.2.12 Landscaping proposals should enhance the existing built and natural environmental features already present in the location, for example, careful retention of healthy trees can give a sense of maturity to a new development and can be a significant asset to any development. The use of native species and regard to soil conditions, drainage, shelter and space should be undertaken when designing the landscaping element of a scheme.



6.2.13 Proposed landscaping schemes should be included in planning applications and planning permissions will not be granted where the site is overdeveloped and the landscaping is piecemeal.

6.2.14 Noise - The scale, nature and frequency of vehicles that service industrial businesses can be a major source of conflict with neighbouring activities, including other industrial uses. The design objective is to manage noise, disturbance and potential danger from deliveries, servicing and storage in order to reduce the impact on neighbours, the natural environment and the general appearance of the area. The best place for this to occur is behind frontage buildings, or to the rear of the main building.

6.2.15 Mitigation measures may be needed, such as earth bunds, reed beds and tree planting to reduce the impact of noise or any detrimental effect on air quality.

6.2.16 The location of the servicing areas, routes in and out of the site and location of mitigation measures combined should reduce the impact of noise or any detrimental effect on air quality.

6.2.17 In addition, working hours may be restricted especially where there are residential areas nearby in order to reduce disputes and conflicts.

6.2.18 Boundary treatments - must be appropriately designed and utilise existing features and vegetation, such as hedgerows and mature trees.

6.2.19 The choice of boundary treatments should relate to the wider physical, ecological and social context of the surrounding environment and seek to make a positive contribution to the character of the area and the building(s). Visually aggressive boundary treatments adjacent to public space will be resisted.

6.2.20 Where they are adjacent to public space, boundary treatments should be transparent to allow clear views into and out of the site and not hinder vision on the highway, particularly at road junctions.

6.2.21 Bin storage - Bin storage areas must be well designed and located in close relation to properties. They should be located no more than 30 metres from the access roadway and be free from steps and kerbs.

6.2.22 Provision should be made for storage and collection of both residual waste and recyclable waste. A compactor could be considered for offices and light industrial developments for residual waste only with separate provision for recycling.

6.2.23 Parking - Adequate parking should be provided, with areas for service vehicles to park and turn if necessary. Parking areas should include some landscaping features and screening in order to reduce the visual impact. Cycle parking must also be provided along with cycle paths and footpaths in and out of the site. Adequate cycle storage of an appropriate size should be included as part of the development. These standards are set out by Worcestershire County Council Highways Department. Please refer to their specific requirements regarding cycle storage.

6.3 Agricultural buildings

6.3.1 Successful building design is not just a matter of what a new agricultural building will look like. In the countryside it is important to look beyond that to consider how new development will relate to its landscape setting and its impact on any settlement where it is to be located.

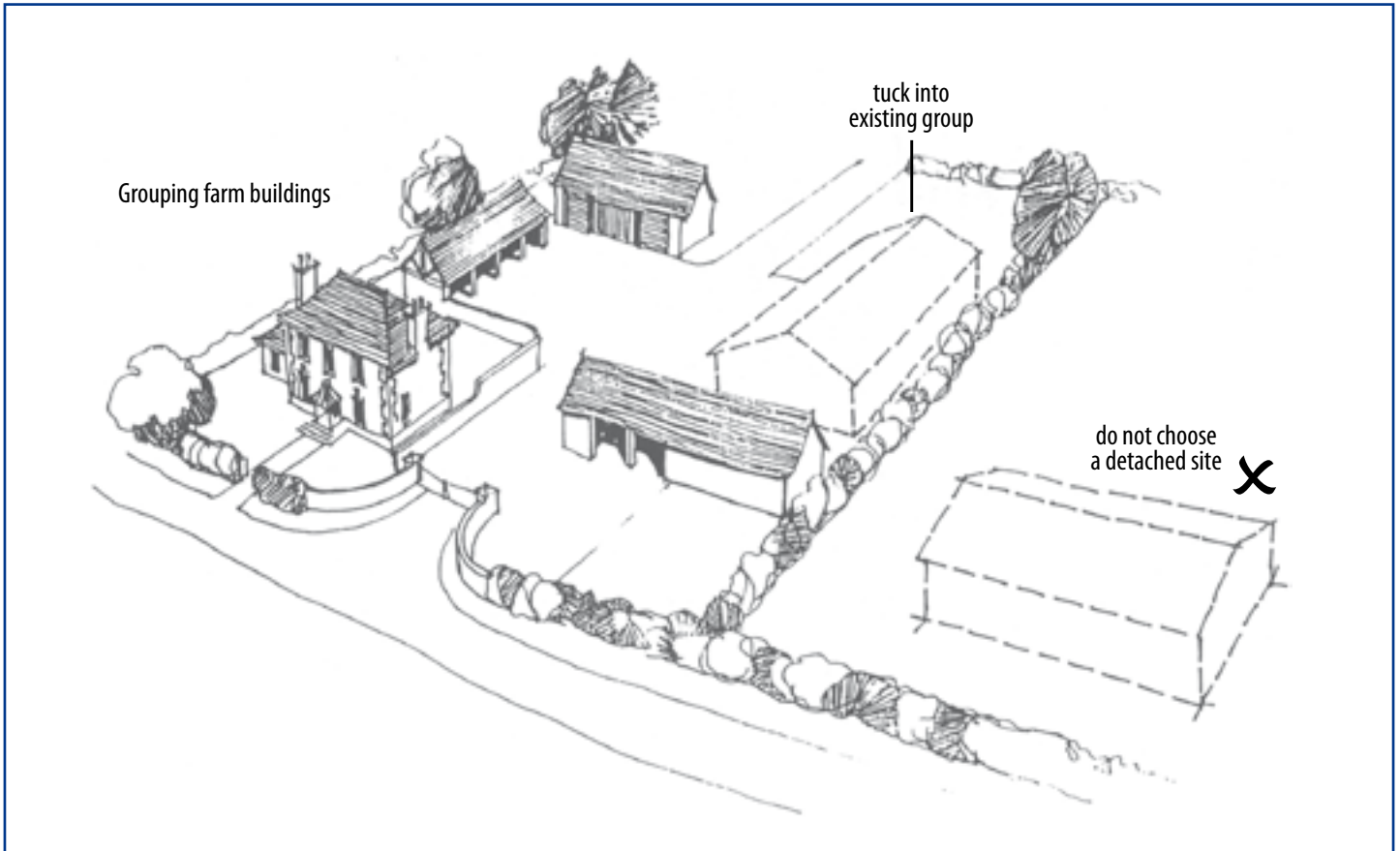
6.3.2 Buildings for agriculture and forestry are not considered inappropriate development in the Green Belt, however, the preservation of the Green Belt remains of paramount importance to the Council and it is important that the visual amenities of the Green Belt are retained and enhanced through ensuring new buildings are appropriately designed.

6.3.3 The following factors should be considered prior to a project being designed and commenced:

- Grouping;
- Boundary treatments;
- Skyline;
- Colour;
- Landscaping;
- Physical Security Standards.
- Access;
- Viewpoints;
- Materials;
- Biodiversity enhancement, and
- Lighting;

6.3.4 Grouping - When seen from a distance it is not the siting of a building which is apparent but its scale in relation to adjacent buildings. Tight clusters of buildings generally look more settled in the landscape than scattered ones. For this reason, new buildings should form part of a group rather than stand in isolation. The siting of new proposals within the setting of a heritage asset is of particular importance. New development sited within a group of other buildings will also benefit from surveillance and be less vulnerable to crime than if located on a detached site or screened site (see Figure 10 on page 29).

■ Figure 10



6.3.5 Access - New agricultural buildings should be located close to existing accesses or exiting buildings where possible to ensure long tracks and large areas of hardstanding are not required.

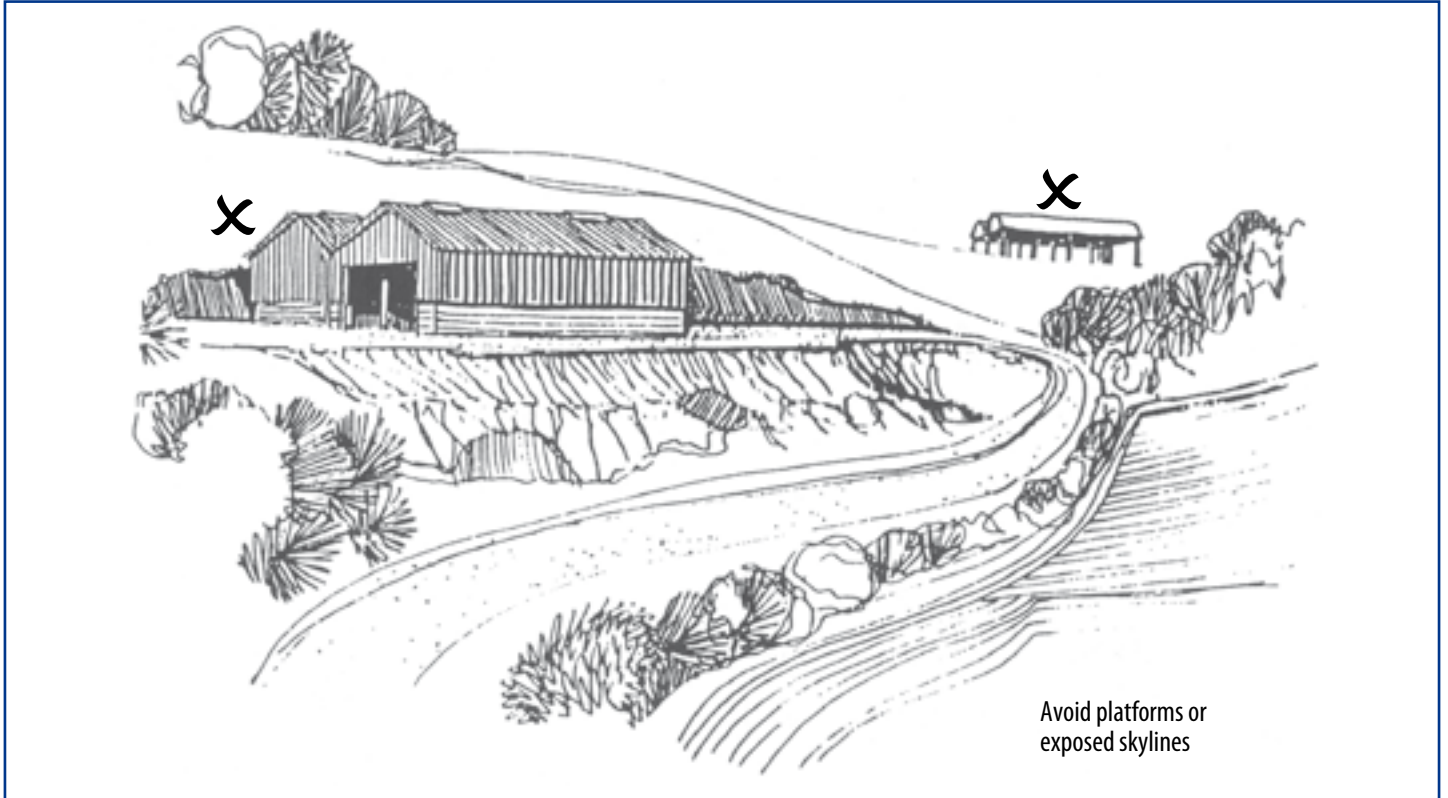
6.3.6 Boundary treatments - Must be appropriately designed and utilise existing features and vegetation, such as hedgerows and mature trees.

6.3.7 The choice of boundary treatments should relate to the wider physical and social context of the surrounding environment and seek to make a positive contribution to the character of the area and the building(s).

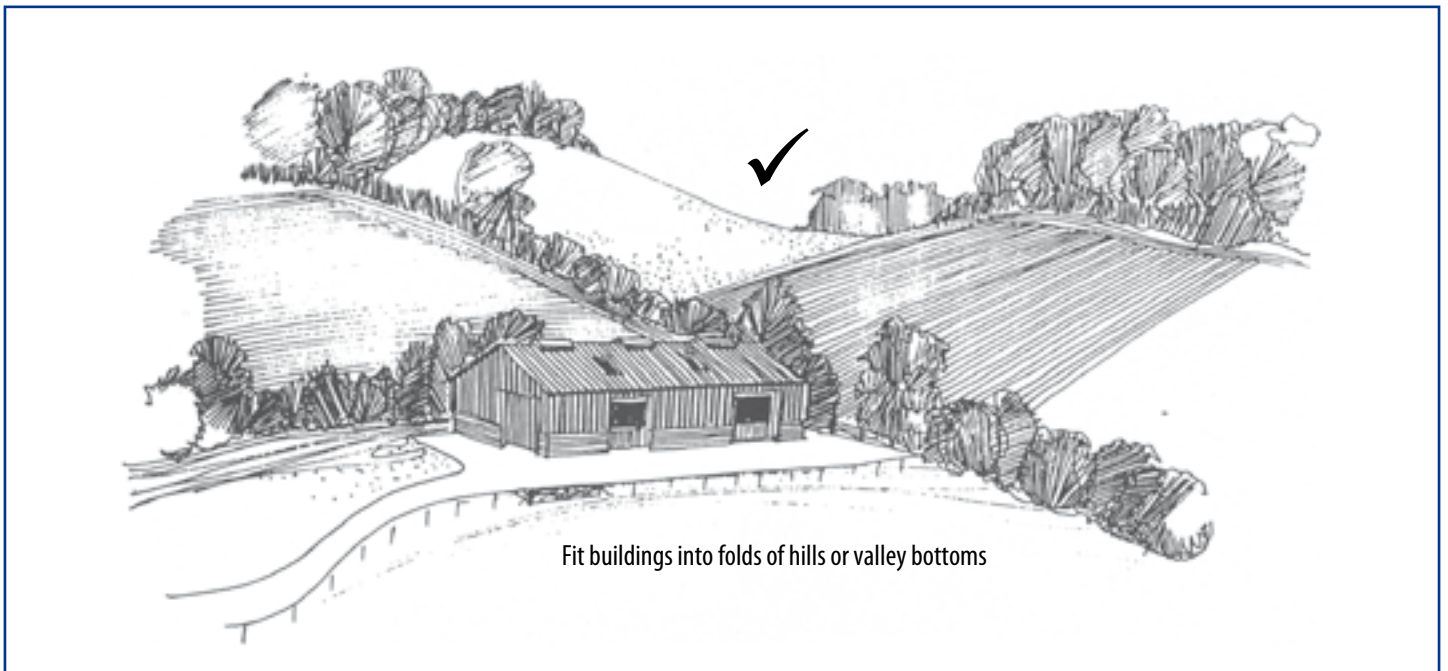
6.3.8 Viewpoints - A modern farm building by nature of its scale and materials can form a prominent feature in the landscape. It is important therefore, that views into and out of the site are accounted for (see Figure 11 on page 30).

6.3.9 Skyline - New buildings should respond to contours and the natural form of the land by fitting into folds or valley bottoms and avoiding platforms or exposed skylines or ridges (see Figure 12 on page 30).

■ Figure 11



■ Figure 12



6.3.10 Materials - Choice of materials should always take account of the adjacent landscape, buildings, walls and gates. Materials should be appropriate for the purpose and reflect the intrinsic nature of agricultural buildings. Over engineered buildings will not be permitted.

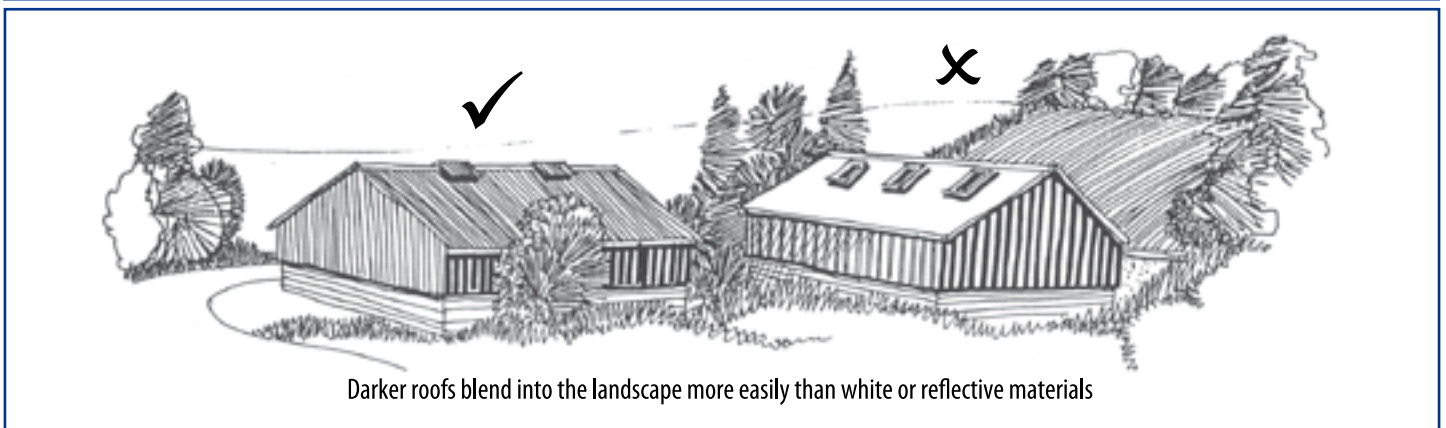
6.3.11 Colour - Generally, colours should be 'earth colours' such as browns, greys or greens to reflect local materials e.g. red bricks with a rustic finish. Juniper green (12B29) and Vandyke brown (08B29) are example colours which should be used. There is no need for new buildings to match the colour of existing buildings where they are sited in or nearby existing buildings (see Figure 13 below).

6.3.12 Landscaping - Landscaping will be encouraged to soften the appearance of agricultural buildings (see Figure 14 below).

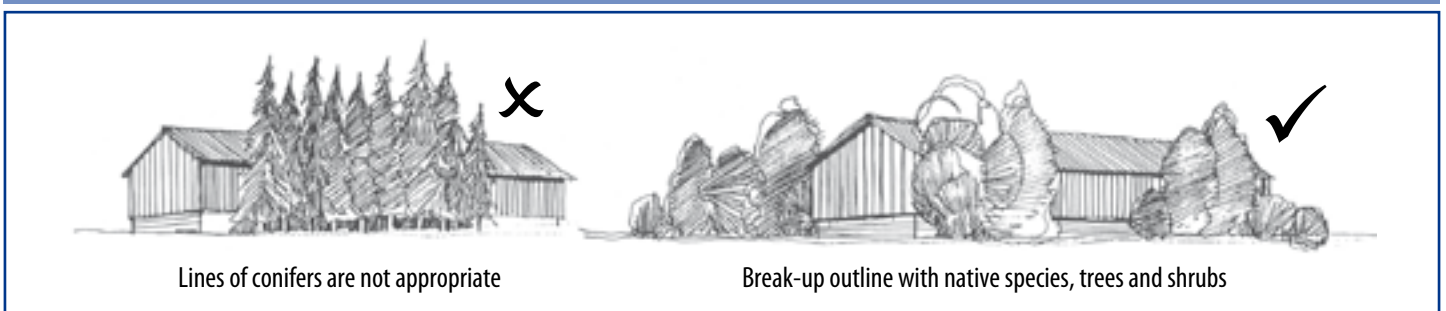
6.3.13 Lighting - Proposals including external lighting in rural areas must pay particular attention to the physiological, ecological and aesthetic impacts of light pollution.

6.3.14 Other material considerations - The effects of noise, lighting and smell on nearby dwellings should be taken into account in detailed site and design planning. Agricultural buildings that are domestic in appearance shall be refused.

■ Figure 13



■ Figure 14



■ Secured by Design

The Council supports the Secured by Design Scheme; applicants are expected to meet those standards wherever possible. Further information can be found at <https://www.securedbydesign.com/>
Windows and external doors, including roof lights and garage doors, installed in a commercial or agricultural development should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.



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6.4 Equestrian developments

6.4.1 The keeping of horses on the smallest scale is likely to require development of some kind and it is rare for equestrian development not to need planning permission.

6.4.2 Regardless of the type of development proposed (be it a simple field shelter, stabling or new access and tracks) consideration will need to be given to a number of factors including siting, scale, design, materials, colour and landscaping. Fitting in with the character of the landscape and respecting existing ecological value should be key considerations of the design.

6.4.3 The change of use of land, from agricultural to equestrian land may be required. If poorly designed and managed stabling can contribute to the rapid spread of disease, cause injury and pose significant fire risks.

6.4.4 Stables and shelters should be kept to a minimum and consist of only essential facilities. Therefore stables should:

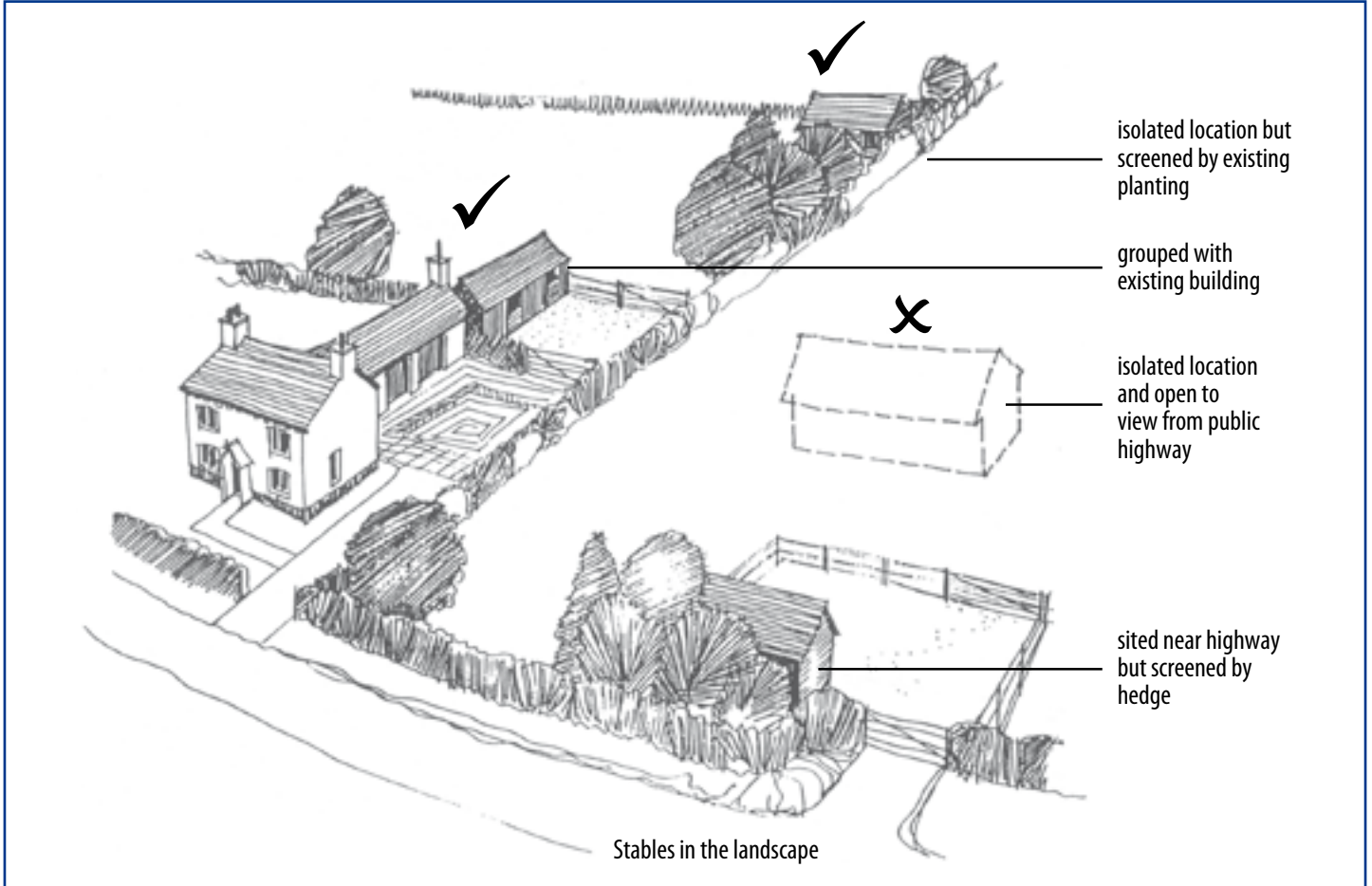
- Contain no more than a small tack room/hay store and the number of stables should reflect the number of horses present on the land. They should not be large enough to enable easy conversion to other uses;
- Have doors a width of 1.25 metres;
- Have stables a minimum size of 3.65 metres x 3.65 metres (12ft x 12ft) in accordance with the British Horse Society recommendations;
- Stable height should be between 2.8 metres and 3.3 metres (9ft to 11ft);
- Be constructed of timber with no more than a single course of brickwork for the stables to sit on;
- Design floors to ensure good drainage, taking stable waste away from the horse;
- Include adequate ventilation and air circulation. There should be a good flow of air throughout the building without unnecessary draughts;
- Be sited as to reduce the amount of hardstanding or track required;
- Be closely related to existing groups for buildings or adjacent to natural screening; and
- Allow easy access to grazing land.

6.4.5 It will be down to the applicant to provide reasonable justification(s) where an application differs to the above.

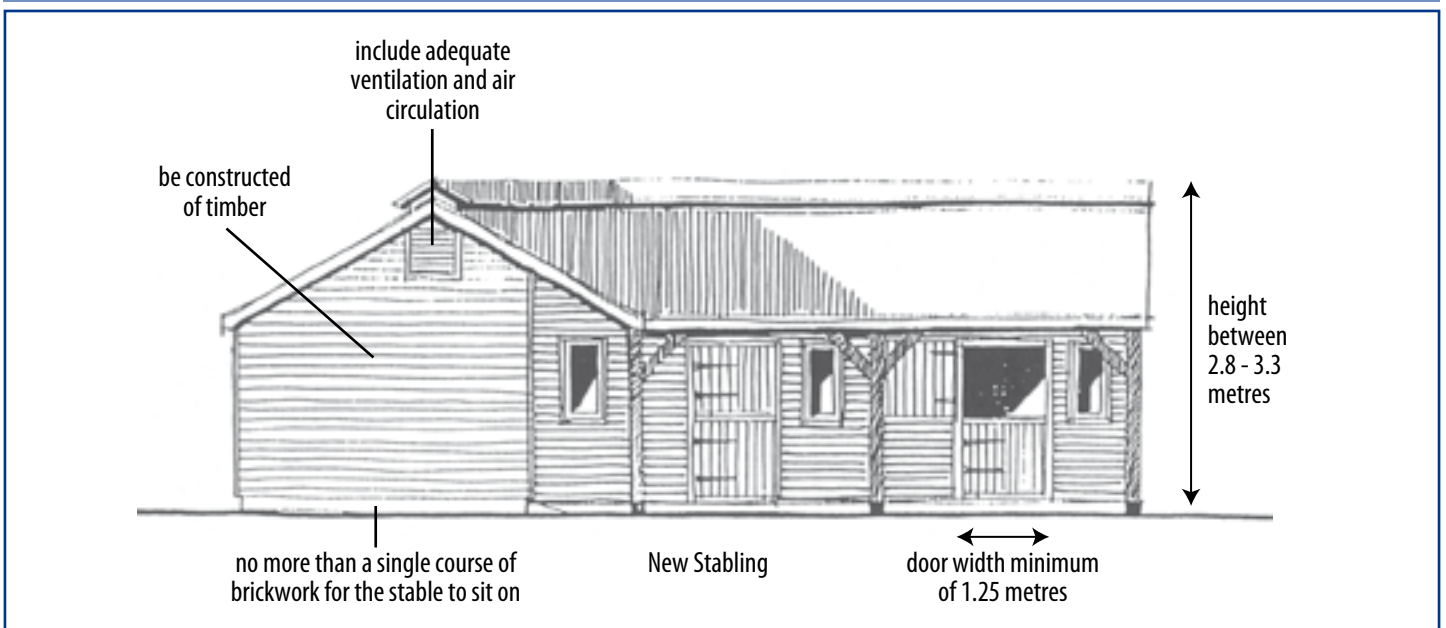
6.4.6 Where a manège is proposed, it should be no larger than 40m x 20m. As a flat surface is needed for a manège it is essential to choose a location where the re-grading of land is limited or not necessary. Manèges should be located close to the corners of a paddock and boundaries and be close to existing buildings and as inconspicuous as possible.

6.4.7 Light pollution is a growing concern. External lighting can make a site appear prominent in the landscape and affect wildlife and the valued sense of rurality. Any planning applications should set out clearly whether or not artificial lighting is proposed, and if so, how light pollution will be minimised. Floodlighting will be strongly resisted.

■ Figure 15



■ Figure 16





6.5 Retail units

6.5.1 An emphasis on good quality design enhances the character of a shopping environment, encourages investment and spending and brings benefits to all commercial interests.

6.5.2 Retail developments should be located within Bromsgrove town or the Local Centres which are detailed in BDP17 and BDP18. Retail proposals that are not in accordance with the retail hierarchy as set out in BDP17 and BDP18 will not be favourably considered.

6.5.3 Retail proposals on the edge of settlements will not be favourably considered unless all other options have been discounted and there is an overwhelming need for retail development.

6.5.4 The Council will pay close attention to the outside design of shops such as signage schemes, parking spaces, gradients and design of access pathways, particularly where a retail unit is proposed outside the pedestrianised core of the Town Centre.

6.5.5 Adequate bin storage for the size and scale of refuse the unit will create should be provided and be capable of being made secure. Bin storage should ideally be no further than 30 metres from the access road and should be free from steps and kerbs. Provision should be made for storage and collection of both residual waste and recyclable waste. A compactor could be considered for residual waste only with separate provision for recycling. Where retail and residential uses co-exist there needs to be sufficient storage for separate residential and commercial waste storage.

6.5.6 Where residential accommodation is provided above retail units it should have a separate access with good surveillance.

6.6 Shopfronts

6.6.1 Changing a shopfront is often seen as a way to modernize a shop, especially when ownership changes or when the use of a shop alters.

6.6.2 Good design need not necessarily be traditional and there are many locations where a well-designed modern shopfront will be acceptable but it must be sympathetic to the building above and the streetscape.

6.6.3 If a traditional style replacement is to be used, it should be appropriate to the building and locality. It must never appear to be of earlier date than the rest of the building.

6.6.4 The presence of unsympathetic shopfronts already within a host building or features elsewhere within the street is not sufficient argument for the installation of equally unattractive or inappropriate features in a new shopfront. Betterment will be sought in all cases to improve the character and appearance of the street scene and complement and enhance features of the building in question.

6.6.5 New and replacement shopfronts should:

- Relate to the building of which it is an integral part;
- Respect the proportions and architectural detailing of the building;
- Ensure that the ground floor is not divorced from the rest of the building;
- Reflect the surrounding character of the area;
- Take account of the variation of individual buildings where a shop occupies more than one building and the elevations are of different design. There should be a variation in the design of the individual shopfronts; and
- Avoid extensive glazing so that a shopfront looks structurally supported whilst also framing the display window.

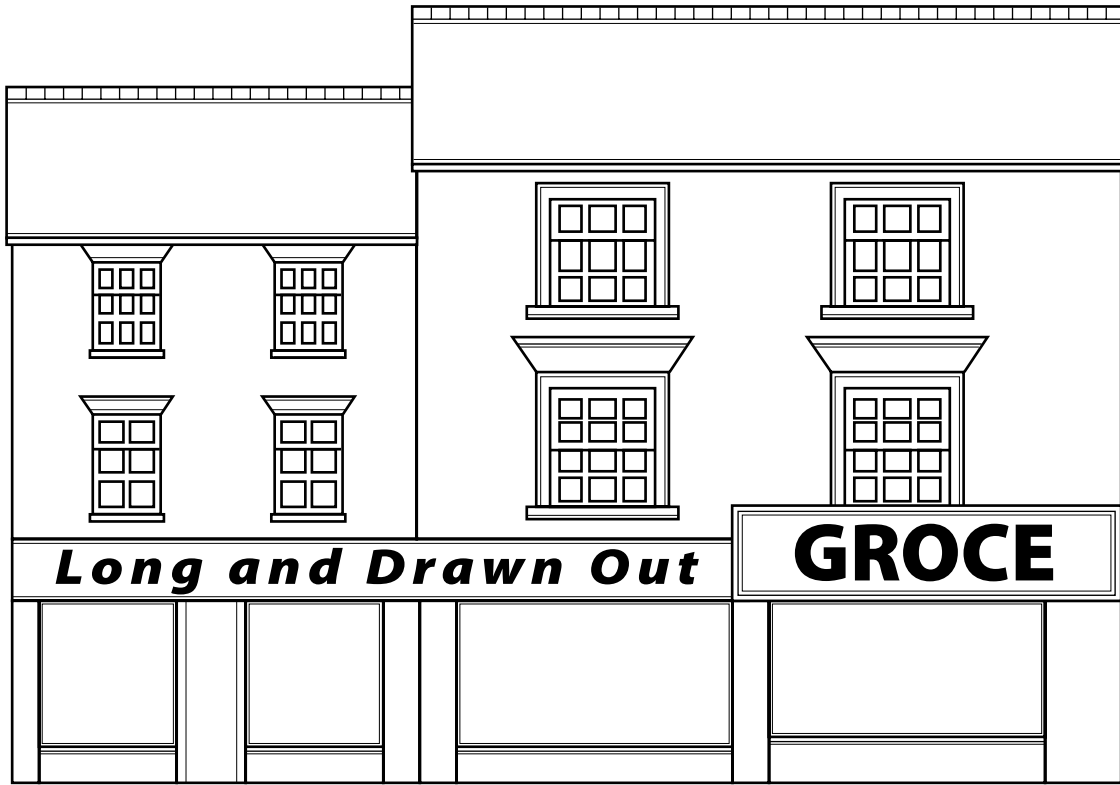
6.6.6 A fascia should state only the name of the trader and, if necessary, the nature of the trade. Unnecessary duplication of a name on a single fascia will not be permitted.

6.6.7 The existence of any former unsuitable fascia should not influence the design of a replacement and any new fascia should not be applied over the top of an existing one.

6.6.8 New fascias must be of a scale and design in proportion to the design of the shopfront and height of the building as a whole. The fascia must be no higher than the bottom the first floor windowsill above (this includes shops and businesses on upper floors). Fascias should not generally exceed 0.6 metres (2 feet) in depth.

6.6.9 Lettering should generally be restricted to a maximum height of 0.3 metres (12 inches) unless exceptional circumstances prevail e.g. large scale building. The materials for the lettering should be appropriate to the context of the area. Hand painted lettering on fascias will be encouraged.

■ Figure 17



Structural discordance.
These shopfronts disregard the proportions of the buildings.

■ Figure 18





6.6.10 In areas where canopies are considered to be acceptable in principle, the following criteria will be applied:

- Traditional matt woven retractable or fan type blinds are preferred. They may be acceptable on Listed Buildings and in Conservation Areas but they will not be acceptable where they disrupt the architectural rhythm of unified terraces or street facades or where they obscure architectural detail or features.
- Continental 'Dutch' blinds, often made from shiny plastic are inappropriate on Listed Buildings and in Conservation Areas. Their structure obscures the fascia and introduces a dominant shape out of character with the street.
- Canopies and blinds should only be sited at ground floor fascia level.
- The design and siting of a canopy should complement the design of the building, be located within the pilaster and should respect the architectural subdivisions of doors and windows.
- New canopies must reflect any existing canopies on adjacent buildings in order to provide a continuous canopy frontage.
- Advertisements should relate solely to the trade or name of business and lettering on the canopy should be no greater than 150mm in height.
- Canopies and blinds should always retract fully into the fascia and should provide safe and adequate ground clearance (minimum 2.4m above ground floor level). Where a shopfront has a recessed door, a metal gate of an open design can be considered.

6.6.11 The Council seeks to resolve potential conflicts between the security needs of shopkeepers and the detrimental appearance of shutters on townscape quality. There is no clear security advantage in using solid shutters rather than other security measures. Proposals for solid shutters will not generally be permitted. Security features should be considered from the outset of shop front design and included as integral parts of a shop front rather than added as an after-thought. A wide range of security products are available that specifically aim to enhance shop front security without detracting from the appearance. These include:

- Laminated glazing;
- Internal window security grilles;
- External removable window security grilles; and
- Visually permeable roller shutters (internally or externally mounted)

6.7 Shopfronts in Conservation Areas and on or near to Listed Buildings

6.7.1 Extra care will need to be taken around heritage assets to ensure that shopfront design does not adversely affect the special character of a Conservation Area or Listed Building and its setting.

6.7.2 Conservation Areas are areas of special architectural or historic interest. Development of shopfronts should preserve the special character of a Conservation Area and its setting. It is a legal requirement to pay special attention, in the exercise of planning functions, to the desirability of preserving or enhancing their character or appearance.

6.7.3 New traditional shop windows should draw the eye and be of interest, reflect the vertical emphasis of the building above. Window subdivisions, mullions and piers should be used for this purpose.

6.7.4 Existing features of traditional shopfronts such as pilasters, fascias, old ironmongery and fire insurance signs should be retained for their historic interest and aesthetic value. Original fascias should always be retained as they form part of the design of the shopfront.

6.7.5 A stallriser gives protection to a shop window and creates a solid visual base to a building. Stallrisers often consist of panelled timber or brick forming a deep moulded skirting which is painted. Occasionally glazed tiles or marble are used. The depth of stallriser must be in sympathy with the overall design of the shopfront and the inclusion of a stallriser in the door may also be appropriate.

6.7.6 Where traditional shopfronts have previously been removed, these should be reinstated and a similar design used when replacing a shopfront. Traditionally most shopfronts were constructed in softwoods and painted. Occasionally hardwoods were used and finished with a glossy varnish.

6.7.7 The two main considerations in determining the exterior finish of shopfronts are location and appearance. The traditional approach has been to favour a painted finish but care should be taken to respect local tradition and it should be borne in mind that high-gloss paint and varnishes, and particularly brilliant whites, are not appropriate for period properties. Matt or semi-gloss will give the best results.

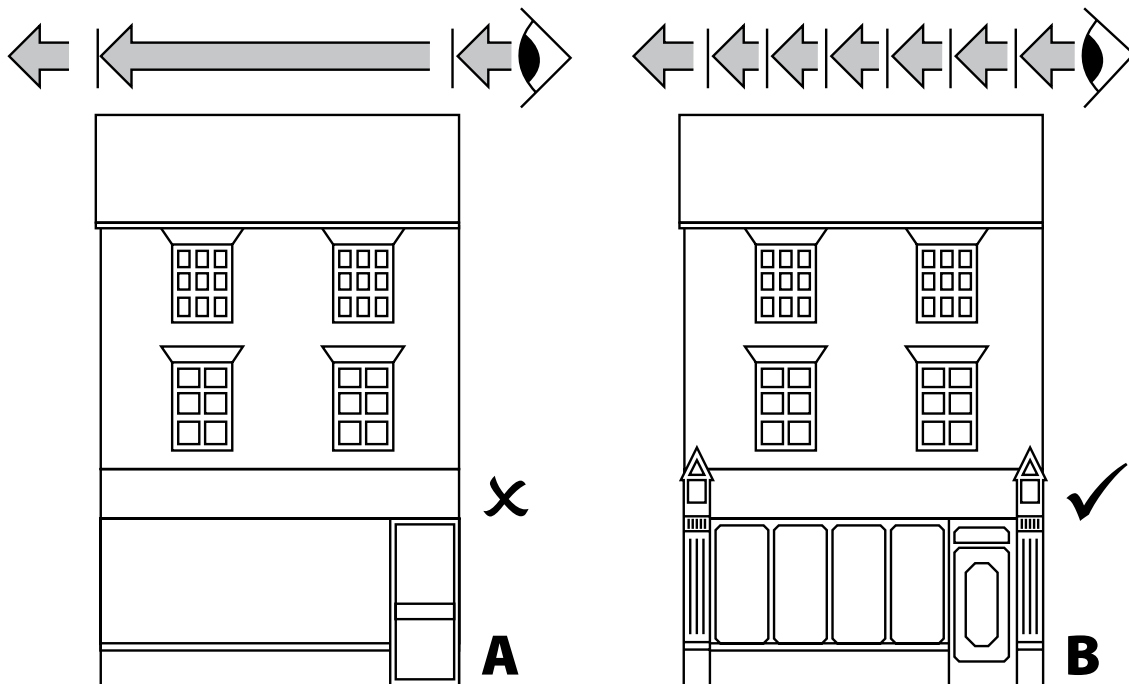
6.7.8 Particular attention will be given to materials in any proposal and no glossy surfaces such as acrylic sheeting or plastic will be permitted on Listed Buildings or in Conservation Areas. The traditional material for shopfronts is timber and its continued use will be desirable in many instances.

6.7.9 Sensitive use of colour, respecting the age and setting of a building offers scope to improve the shopping street and in general rich dark colour or those that are muted in tone give the most suitable background to highlight a window display.

■ Please note

Proposals within a Conservation Area or for or near a Listed Building should be discussed with the Conservation Officer prior to applications being submitted.

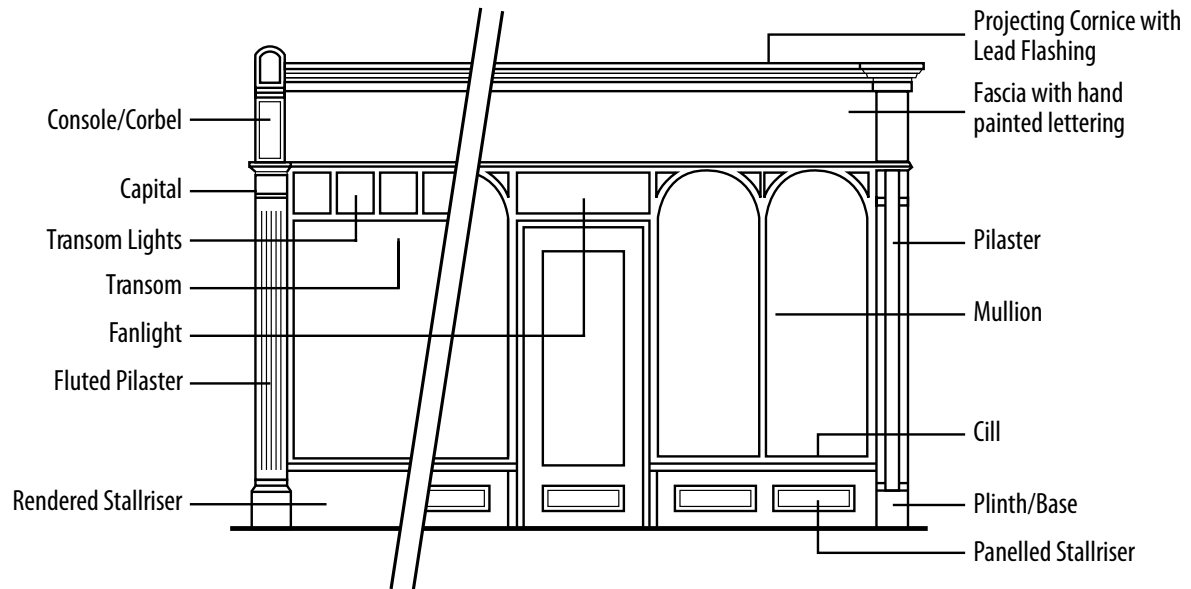
■ Figure 19



Horizontal and vertical emphasis.

Diagram B retains the interest for longer than A due to the longer period for the eyes to travel across the vertical lines on the frontage

■ Figure 20

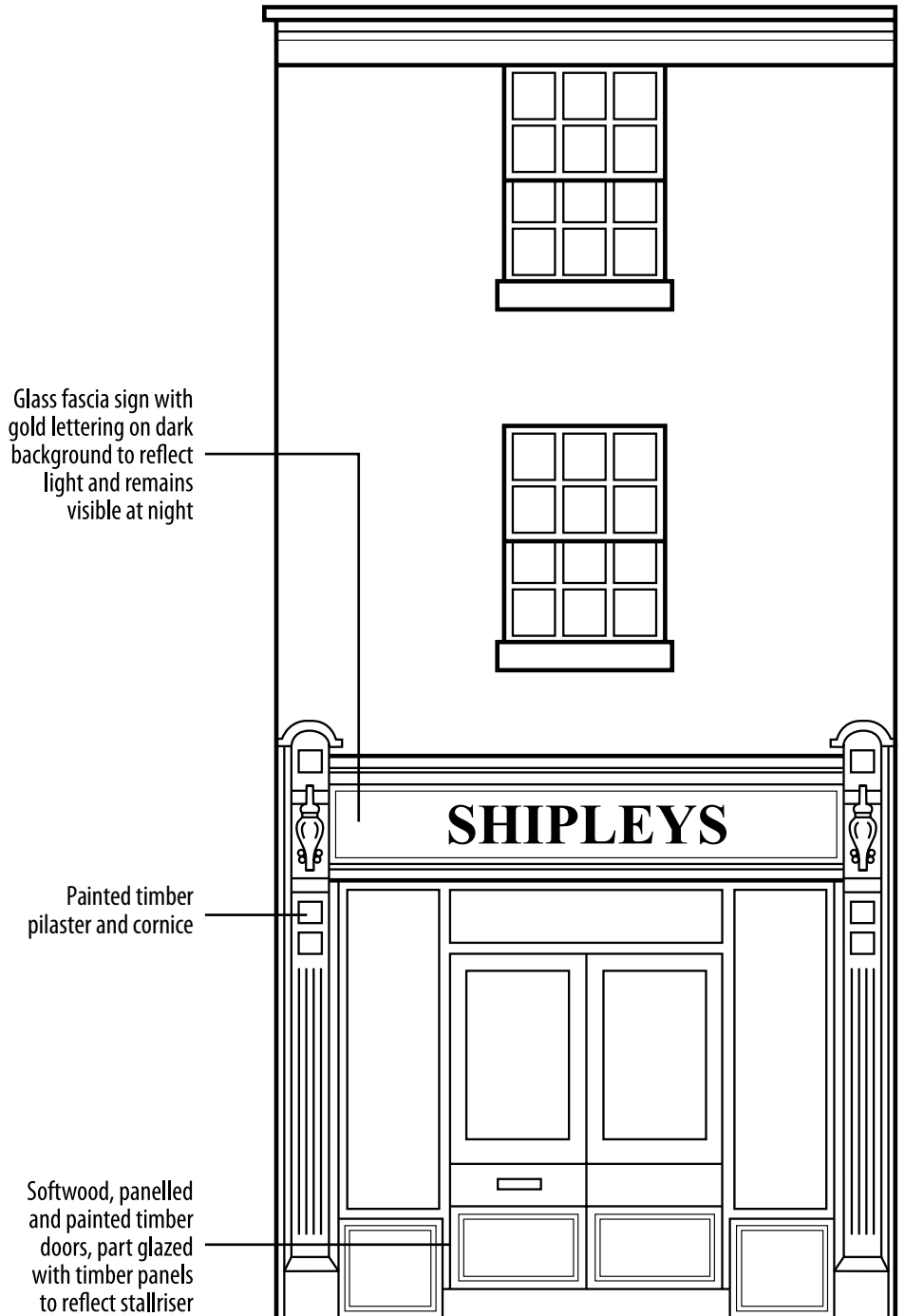


Shopfront Terms.

The various elements each have a visual and practical function. The pilasters identify the vertical division between the shopfronts the fascia provides the space for advertising, the cornice gives a strong line at the top of the shopfront and protection from the weather, the stallriser gives protection at ground level and provides a solid base.

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■ Figure 21



New shopfront respects the proportions of the building

7. Advertisements and Signage

7.1 Key Considerations

7.1.1 Advertisements and signage can make a significant contribution to the character of an area and a shopfront or business. Poorly designed signage can detract from the character of a building and area.

7.1.2 Many advertisements require Advertisement Consent, which is similar to planning permission. Where advertisement consent is required, the Council will expect the content of signs to be kept to a minimum.

7.1.3 Excessive advertisement should be avoided.

7.1.4 The Council will expect corporate advertising to be adapted to fit buildings and townscape, particularly on Listed Buildings and in Conservation Areas.

“The quality and character of places can suffer when advertisements are poorly sited and designed... Advertisements should be subject to control only in the interests of amenity and public safety, taking account of the cumulative impacts.”

NPPF Paragraph 132

■ Deemed Consent Box

A number of types of advertisements and signage have the benefit of deemed consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) subject to the standard conditions and the conditions and limitations relating to that advertisement. Deemed consent means that certain types of adverts which comply can be undertaken without the need for advertisement consent.

7.2 Hanging or Projecting Signs

7.2.1 Well-designed hanging or projecting signs can add to the character of the area.

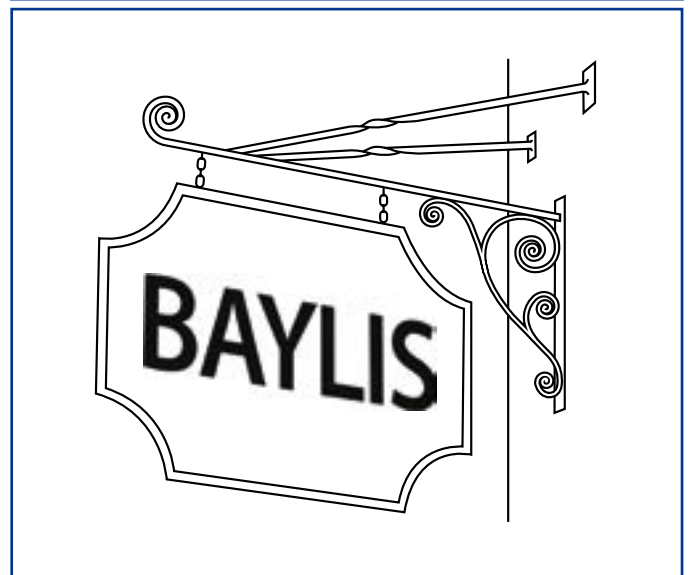
7.2.2 Hanging and projecting signs should relate to the size and scale of a building and neither appear over intrusive nor too small. The materials and colours of the signage should reflect the fascia of a business and respect the character of the area.

7.2.3 Projecting signs should generally be in line with the fascia panel and not above the first floor sill level.

7.2.4 Traditional hanging signs denoting a trade may be suitable for historic buildings. They should be constructed in metal or wood and be hung from an appropriately designed metal bracket.

7.2.5 The Council will not permit more than one projecting or hanging sign per shopfront in order to avoid street clutter and will not normally allow illuminated projecting signs. Projecting signs should not exceed 0.4 sq. metres (4.3 sq. feet).

■ Figure 22





7.3 Free standing signage

7.3.1 Any free standing signs for business premises should be incorporated into a landscaping scheme and should preferably be located near the main site entrance.

7.3.2 Signs can include the logo of the business and the name of the business.

7.3.3 Appropriate colours should be used so as not to detract from street signage.

7.3.4 A proliferation of advertisements, especially on sites fronting main roads and railways, will not be permitted.

7.4 Window signs

7.4.1 Window signs provide a suitable method of advertising first floor premises.

7.4.2 Lettering on window panes of the shared advertising space of the ground floor trader can be used to advertise retail space on higher floors.

7.4.3 Lettering should generally be restricted to a maximum height of 0.3 metres (12 inches) unless exceptional circumstances prevail e.g. large scale building.

7.5 Conservation Areas and Listed Buildings

7.5.1 Within Conservation Areas, advertisements and signage should reflect the character and nature of the Conservation Area and be of traditional materials or be traditional in appearance materials.

7.5.2 Advertisements and signage on Listed Buildings will need to reflect the historic nature of the building and be of traditional materials and colours.

7.5.3 Illumination will not normally be permitted unless it is halo or down lit, but should be finalised in discussion with the Council's Conservation Officer.

8. Mixed Use Development

8.1 Mixed use developments will need to take into account the guidance in both the 'Residential Development - Creation of New Dwellings' and 'Non-residential Development' sections of this High Quality Design SPD.

8.2 Mixed use developments should contain an appropriate mix of uses, depending on the location and nature of the proposal and policy requirements in the Bromsgrove District Plan.



Notes

**If you need this information
in another language or format,
please contact us to discuss how we
can best meet your needs.**

Phone: 01527 548284

Email:

equalities@bromsgroveandredditch.gov.uk



**Bromsgrove
District Council**

www.bromsgrove.gov.uk

High Quality Design SPD

Bromsgrove District Council

Planning and Regeneration

Town Hall

Walter Stranz Square

Redditch

Worcestershire B98 8AH



Bromsgrove District High Quality Design Supplementary Planning Document (SPD)**Summary of Consultation**

Public consultation on the draft High Quality Design supplementary planning document (SPD) for Bromsgrove District was undertaken from Monday 22 January 2018 – Sunday 4 March 2018. Using the consultee database held by the Strategic Planning team at Bromsgrove District Council, the following broad groups were consulted via email/letter to give notification of the consultation period:

- Statutory Consultees, including Parish Councils and neighbouring local authorities;
- Other interest groups and relevant stakeholders;
- General members of the public who were on the database;
- Representatives from the development industry;
- Local Councillors; and,
- Internal Council colleagues from other departments.

The draft SPD was available to view and download from the Council's website during this period at <http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/supplementary-planning-guidance.aspx>

Copies of the SPD were also placed in Council offices (Parkside) and local libraries for the duration of the consultation period. Finally, an advert publicising details of the consultation was also placed in the Bromsgrove Advertiser local newspaper.

Table 1 below records all representations made to Bromsgrove District Council during the consultation period. Alongside specific comments made by respondents, Table 1 also includes a response from the BDC Strategic Planning team on that particular comment as well as the detail of any proposed action to change the SPD where it has been deemed necessary to make a suggested change by a respondent.

Table 1 - Consultation Comments Received and Officer Response / Action for Revised SPD

Response No.	Name/Organisation	BDC/RBC	Response	Summarised response	Officer response
01	Stuart J Dudley	BDC	<p>Thank you for the opportunity to comment on your draft design supplements. The draft design supplement looks like it will be a useful document, however, I do not believe the documents are clear on what can be achieved with Permitted Development Rights and if anything appear to me to put people off exploring these rights which often allow homeowners more flexibility than would be allowed through a traditional planning route. Indeed many of the projects that could be undertaken under PD would conflict with this document.</p> <p>The wording of Point 2.2.4 is slightly misleading and I would suggest is amended as it appears to suggest that developments which can be undertaken via permitted development are required to take into account the information with the SPD which is not technically the case.</p>	<p>The draft design supplement looks like it will be a useful document</p> <p>The documents are not clear on what can be achieved with Permitted Development Rights and appear to put people off exploring these rights. Many of the projects that could be undertaken under PD would conflict with this document.</p> <p>The wording of Point 2.2.4 is slightly misleading and I would suggest is amended as it appears to suggest that developments which can be undertaken via permitted development are required to take into account the information with the SPD which is not technically the case.</p>	<p>Comment noted.</p> <p>It is considered that para.2.2.1 and 2.2.2 explain the purpose of PD rights and advises property owners to contact the local authority planning department if they are in any doubt about the extent of PD rights on their property.</p> <p>Para.2.2.4 is written in the context of offering guidance to development proposals, whether carried out under PD rights or not, to take account of the information in the SPD in an attempt to deliver good design. It does not set out mandatory terms for development proposals.</p>
02	Natural England	BDC	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should plan <i>'positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'</i>. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> ☑ green roof systems and roof gardens; ☑ green walls to provide insulation or shading and cooling; ☑ new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p> <p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost</p>	<p>Natural England don't wish to provide specific comments, but advise that the following issues are considered:</p> <ul style="list-style-type: none"> • Green Infrastructure • Biodiversity enhancement • Landscape enhancement • Other design considerations (in NPPF) • Strategic Environmental Assessment/Habitats Regulations Assessment 	<p>The SPD has been amended to include reference to the County Green Infrastructure Strategy, but its primary purpose is to support the policy requirements of Policy BDP19 from the adopted Bromsgrove District Plan. Further policy provision for Green Infrastructure, including having regard to the County GI Strategy, is made by Policy BDP24 in the adopted plan.</p> <p>Further specific amendments have been made to the SPD in relation to these issues at:</p> <ul style="list-style-type: none"> - Para.3.1.3 – new reference to biodiversity considerations - Para.4.2.34 – reference to open space layouts in the context of green infrastructure networks - Para.4.2.56 – reference to potential effects of lighting on wildlife - Para.4.2.58 – reference inserted to biodiversity enhancement - Para.4.2.63 – reference to the Worcestershire County Green Infrastructure Strategy in relation to wildlife habitats - Para.6.4.7 – new reference to wildlife as well as landscape in terms of the potential impacts of lighting <p>Additional text added to paras. 3.1.3, 3.1.12, 4.2.53 to include references to biodiversity considerations.</p>

			<p>or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 125).</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>		<p>Text concerning historic characterisation (and the Historic Environment Record) has been added at 4.2.12 under the 'Local character and distinctiveness' sub-section.</p> <p>New text added to para.4.2.53 as follows: <u>"The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development."</u></p> <p>Comment noted.</p>
03	Wychavon District Council	BDC & RBC	<p><u>Paragraph no. 2.4 pg 8</u></p> <p>In subsequent points, make reference to –</p> <ul style="list-style-type: none"> • Each qualifying application should require a D & A statement outlining the intention and reasoning for design • All new developments encouraged to comply with 'Buildings for Life 12' creating a more sustainable and improved quality built environment (could also make reference to 'MADE' – Midlands Architecture and Design Environment) • Though not a necessity, it is worth while seeking pre-application advice from local authority • Listed building consent needed for works to listed buildings (and/or buildings in the immediate vicinity) <p><u>Reason</u> - Provides more information on aspects of the planning process and requirements.</p> <p><u>Paragraph no. 3.1.2 pg 9</u></p> <p>Sustainability/environmental effect –</p>		<p>Noted – no change</p>

		<ul style="list-style-type: none"> Consider the sustainability of alteration/extension <ul style="list-style-type: none"> Is it built in a sustainable manner with consideration for the environmental impact? <p><u>Reason</u> -To provide information on environmental impacts within construction.</p> <p><u>Paragraph no. 3.1.3 pg 9</u></p> <p>Include ‘conservation area’ to list.</p> <p><u>Reason</u> -Has significant effect on planning issues.</p> <p><u>Paragraph no. 3.1.7 pg 10</u></p> <p>Neighbour impact –</p> <ul style="list-style-type: none"> Would benefit from more/clearer illustrations and images <p><u>Reason</u> - Allows user to visualize design implications – existing image convoluted.</p> <p><u>Paragraph no. 3.1.11 pg 12</u></p> <p>Change point iii). –</p> <ul style="list-style-type: none"> Respect local styles and features to maintain built vernacular <p><u>Reason</u> - Saves repetition of word ‘local’.</p> <p><u>Paragraph no. 3.11 pg 15</u></p> <p>Add section on contemporary/modern design –</p> <ul style="list-style-type: none"> Subtle design and material use, that whilst making improvements, do not detract from existing character <p><u>Reason</u> - Provides architectural design merit and innovation, and allows for ‘high quality design’.</p> <p><u>Paragraph no. 4.2 pg 17</u></p> <p>Include as a consideration or have as a ‘Please Note’ –</p> <ul style="list-style-type: none"> All construction needs to comply with current Building Regulations and to be built in accordance with British Standards <p><u>Reason</u> - Demonstrates legalities for user. (Continued overleaf)</p> <p><u>Paragraph no. 4.2.10 pg 18</u></p> <p>Condense and/or bullet point middle sentence – <i>“the use of particular materials...local character of an area”</i></p> <p><u>Reason</u> -Sentence too long.</p>		<p>Noted – no change</p> <p>Noted – para.3.1.3 revised as follows: “Other planning considerations such as Green Belt, protected and priority species, Highways impacts, sustainability of construction, <u>heritage assets</u> Listed Buildings and nearby trees may need to be taken into account”.</p> <p>Noted – no change</p> <p>Noted – no change</p> <p>Noted – however the entire SPD is written in the context of ‘allows for high quality design’, therefore no further change is considered necessary.</p> <p>Noted – no change.</p> <p>Noted – no change.</p>
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			<p>Paragraph no. 4.2... pg 17+</p> <p>To include in an existing/new section –</p> <ul style="list-style-type: none"> • Consideration should be given to car parking/congestion on new developments – ensuring there is enough space for free movement and ample space for parking. To include the movement of larger vehicles – <ul style="list-style-type: none"> ○ Bin lorries ○ Delivery lorries/vans ○ Emergency services • Make reference to the County Councils draft ‘Streetscene Guide’ <p><u>Reason</u> - To ensure adequate thought and design is given to traffic management and infrastructure.</p> <p>Paragraph no. 4.2.66 pg 25</p> <p>Make reference to West Midlands crime officer and crime prevention design advisory.</p> <p><u>Reason</u> - To ensure developments are designed in accordance with crime prevention.</p> <p>Paragraph no. 5... pg 27+</p> <p>Include a reference to Historic England guidance on barn conversions ‘Adapting traditional Farm Buildings’ October 2017.</p> <p><u>Reason</u> - To ensure correct guidelines are followed.</p> <p>I trust this can help with the production of the SPD and am happy to clarify any points if necessary. If you have any further queries, please do not hesitate to contact me using the details below.</p>		<p>Noted – car parking as a design consideration is included in the SPD at paras.4.2.34 – 4.2.39. More detailed consideration of traffic management and highways infrastructure would be outside the remit of this SPD, with the issues referred to in this comment now covered in Worcestershire County Council’s Streetscape Design Guide (June 2018).</p> <p>Noted – information regarding ‘Secured by Design’ guidance is now in an information box based on consultation comments received by the BDC/RBC Community Safety Officer.</p> <p>Noted – new information box included in Section 5 relating to guidance available from Historic England and Worcestershire County Council for conversion of rural buildings and issues relating to historic farmsteads.</p>
04	James Cooper BDC/RBC Community Safety	BDC & RBC	<p>Thank you for your invitation to provide feedback on these documents.</p> <p>I note that the content relating to community safety and crime prevention through environmental design is the same in both documents, so the following comments apply equally to each.</p> <p>I welcomed the opportunity to engage with the Officers leading the development of these documents around the issues of community safety and crime prevention, prior to the formal public consultation that is now underway. I would like to acknowledge the efforts of these Officers to understand and represent my earlier feedback within the draft for public consultation.</p> <p>At this stage, I believe that the documents require further amendments to adequately and accurately reflect some of the key issues relating to community safety and crime prevention through environmental design.</p> <p>Some of the required amendment relates to the clarity of the proposed guidance around the issues of permeability, natural surveillance and boundary treatments. In these cases it is clear that crime prevention issues have been considered but the expression of the guidance can be somewhat ambiguous and/or repetitious.</p> <p>At other points, the documents miss opportunities to give clear guidance to help</p>	<p>The documents require some amendments to reflect some of the key issues relating to community safety and crime prevention.</p> <p>More clarity is needed around issue of permeability, natural surveillance and boundary treatments. References to guidance need to be clear.</p> <p>There are missed opportunities to provide guidance on reducing the risk of crime and ASB relating to:</p> <ul style="list-style-type: none"> • Security of sites prior to and during development • CCTV • Lighting • Defensible space • The Councils’ stance on the Secured by Design scheme • Physical security standards for: <ul style="list-style-type: none"> ○ Non-residential developments ○ Commercial developments ○ Retail units 	<p>Suggested text amendments made by respondent via a ‘track change’ version of SPD; for specific comments and officer responses, please see track change version (BDC_RBC Design SPD Rep_04) by contacting the BDC/RBC Strategic Planning team on strategicplanning@bromsgroveandredditch.gov.uk</p>

			<p>reduce the risk of crime and ASB relating to:</p> <ul style="list-style-type: none"> • Security of sites prior to and during development • CCTV • Lighting • Defensible space • The Councils’ stance on the Secured by Design scheme • Physical security standards for: <ul style="list-style-type: none"> ○ Non-residential developments ○ Commercial developments ○ Retail units ○ Bespoke developments such as those in Conservation Areas, near to Listed Buildings or non-designated heritage assets, rural buildings converted to residential use • Management & maintenance of developments after completion <p>These issues are core community safety concerns, reflected in National Planning Guidance and the Redditch “Designing for Community Safety” SPD which the proposed Redditch SPD is set to replace. I believe it is reasonable that further attention is paid to their representation in the documents.</p> <p>Thank you for your consideration of my comments.</p>	<ul style="list-style-type: none"> ○ Bespoke developments such as those in Conservation Areas, near to Listed Buildings or non-designated heritage assets, rural buildings converted to residential use • Management & maintenance of developments after completion 	
05	Bentley Pauncefoot Parish Council	BDC	<p>Bentley Pauncefoot Parish Council accepts that, although legally not part of the Bromsgrove District Plan, this Supplementary Planning Document is intended to add further detail to policies expressed in that document regarding development sites. We also understand that its practical ideas and suggestions are intended to form a starting point for effective development planning and will be given substantial weight in any assessment of the merits of the eventual planning application.</p> <p>The draft document appears to be both comprehensive and well-illustrated, covering the mechanics of applying for planning permission and acceptable design principles for development at levels ranging from a request for alterations to a single dwelling house to large scale housing development for which a Design Guide would need to be prepared. There are, nevertheless, some sections of the document which, in the opinion of Bentley Pauncefoot Parish Council, would benefit from clarification. These are detailed in the following paragraphs:-</p> <ol style="list-style-type: none"> 1. When seeking to describe the functions of the Supplementary planning Document, the first paragraph (1.1.1) refers to “clarity for architects and agents in knowing the parameters of what is expected from the Council.” Paragraph 1.3.1 expands on this to include others who may find the information helpful. We query, however these latter groups would be better included in the introductory paragraph which, as it stands seems more “exclusive” than “inclusive”. 2. Sections 2 and 3 concentrate on the preparation of application and advice regarding small scale domestic projects. Descriptions of help available from the Planning Officers are accompanied by the suggestion that “it is advised that you speak to your neighbour about the proposed development” (2.2.4) Interaction, at an early stage, between a person proposing to change and those likely to be affected by it, is thus explicitly encouraged. We can surmise that such interaction has the potential to speed up the formal application process and also engender more positive feelings between neighbours. <p>In section 4 however, where the creation of new dwellings on a large scale is</p>	<p>The following sections of the document would benefit from being reworded for clarity:</p> <p>Para.1.1.1 is exclusive in only listing “architects and agents”</p>	<p>Noted – para.1.1.1 has been revised as follows: “...and provides clarity for architects and agents <u>applicants</u> in knowing...”</p> <p>Para.1.3.1 remains unchanged as it provides an example list of ‘applicants’ referred to in amended para.1.1.1.</p> <p>Noted.</p> <p>Noted – amended text from para.2.2.4 also added to</p>

		<p>discussed, there is no reference to the potential benefits of early interaction between those proposing and those affected by change. This would seem to be at odds with NPPF Paragraph 66 “Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of a new development should be looked at more favourably”. We suggest that those who live and work in an area often understand its strengths and weaknesses and their priorities and concerns need to be aired at the pre-application stage to effectively inform an emerging plan. We can understand that planners and developers may be wary of consulting those who may, in the first instance have been against the general principle of development of a site but, once a local plan sets aside a site for potential development, it is in the interests of all if early and constructive discussions are undertaken to better enable the aspirations expressed in it and its Supplementary Planning Documents to be realised.</p> <p>In our own parish such an approach is exemplified in the developing relationship between The Foxlydiate Temporary Working Party set up by the Parish Council and the Case officer for the Foxlydiate development, Simon Jones, who relays and discusses the progress of planning for the SUE on a monthly basis and intends to arrange meetings with the developers for the group. The local community thus feels that it is making its voice heard.</p> <p>We suggest therefore that Section 4 should include reference to the continuing advisory role that local communities can play in the long process of the development of larger sites.</p> <p>3. Translating the agreed principles of high quality design into action, over what could be some years, with the aim of creating a cohesive community, depends not only on the principles espoused, but on the manner in which they are implemented, reviewed and monitored; whether Planning Conditions are imposed which are reasonable and capable of being enforced if deemed necessary and whether the resources, both human and economic are available. Perhaps this Supplementary Planning Document would be brought to a realistic conclusion if these points were mentioned.</p> <p>In addition to the substantive points listed above, you might wish to consider the following suggestions for textual adjustments which could further clarify the document.</p> <p>1.4.1 Repetition “and may and may” needs amending.</p> <p>2.3.2 presumption that readers will know what is meant by “material planning conditions” Whilst many do, an explanation, in that section, for those who don’t, would be over long. Including an explanation in a glossary would be preferable.</p> <p>Page 7 PD Box “45 degree code” This can easily be understood by reference to Figure 1. We suggest that this is pointed out.</p> <p>3.6 Outbuildings. It is not clear when outbuildings need Planning permission and/or where guidance might be available. Further detail in a glossary?</p> <p>3.9.1 A helpful definition of a “non-designated heritage asset” but it is repeated</p>		<p>beginning of para.4.2.2 as follows: <u>“It is advised that neighbours are consulted about the proposed development, and try to avoid impacting on neighbours privacy and amenity”.</u></p> <p>Noted - repetition deleted.</p> <p>Noted – footnote added relating to para.2.3.2 to provide definition of material planning considerations.</p> <p>Noted – cross reference to Figure 1 remains in document text but PD boxes removed from document on presentation grounds.</p> <p>Guidance on whether or not an outbuilding requires planning permission is addressed by the guidance at the start of the document on whether development may be permissible under permitted development rights (PDRs).</p> <p>Noted – the repetition is intended in light of the</p>
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			<p>in 4.3.3 and again 6.1.7 use of a glossary would avoid repetition.</p> <p>6.2.12 and 6.2.13 We read “to reduce the impact of noise or air quality”. Do you mean “to reduce the impact of noise or any detrimental effect on air quality”?</p> <p>We trust that our comments will be of help to as you work towards producing the definitive version of the High Quality Design Supplementary Planning Document.</p>		<p>potential for an applicant to only use one section of the SPD depending on the nature of their proposed development.</p> <p>Noted – changes made to wording of para.6.2.12 and 6.2.13 as suggested.</p>
06	Alvechurch Parish Council	BDC	<p>Para 1.4.5 page 4 It is felt that a mention should also be made here in this paragraph, and (2.3.2, PAGE 6) that applications will also be judged on relevant policies within any neighbourhood Plans that have been adopted in the District.</p> <p>Para 2.3.2 page 5 & 6 The SPD is a good document, and we feel slight improvements could be made by the opportunity of including the mention of Neighbourhood Planning and the design policies and statements that NPs may contain and that are particularly relevant in the smaller settlements within the District and that they too must also be considered for design guidance at the very local level.</p> <p>Para 3.9.1 page 11, para 4.3.3 page 20 and para 6.1.7 page 25 NPs, such as the Alvechurch parish Neighbourhood plan, when adopted have such heritage lists and policies that are relevant to them, so this could be mentioned at these noted paragraphs. These paragraphs would be appropriate ones to mention that for NPs that may be adopted in due course.</p> <p>Para 4.2.10 page 14 Mention could be made here of Parish Design Statements which bring a very local picture and identify very local characteristics of settlements within the District.</p> <p>Para 4.2.11 page 14 Again in this paragraph, policies within NPs are also valuable to highlight some of the locally valued views and landmarks within the District, and could be mentioned.</p> <p>Para 6.2.2 page 25 The bullet list in this paragraph could be strengthened by the addition of “Odour” Odour together with noise, as an example a “farm” handling rotting animal waste and generating large amounts of complaints from local residents ...We suggest such plants should not be given licenses for a change of use in rural residential area, therefore a mention of “odour” in the bullet list is relevant.</p> <p>Section 5 page 21-24 This part of the SPD could be strengthened by use of and reference to the Worcestershire Farmsteads Guidance and WORCESTERSHIRE FARMSTEAD ASSESSMENT FRAMEWORK. This framework aims to inform and achieve the sustainable development of historic farmsteads, including their conservation and enhancement. It is of interest to those with an interest in the history and character of the county’s landscape, settlements and historic buildings. The APNP also refers to this document and we think this would add further guidance and strength for your</p>		<p>Noted - text added to paras.1.4.5 and 2.3.2 to refer to any relevant neighbourhood plan policies also being a consideration when assessing development proposals.</p> <p>Noted - however it is not considered necessary to make wholesale references to neighbourhood plans, which ultimately may or may not include detailed policies on design, in this SPD. The intention of the SPD is primarily to offer further guidance on the policies set out in the Bromsgrove District Plan. Certain additional references to neighbourhood plans have been added though as per suggestions at 1.4.5 and 4.2.10.</p> <p>Noted – the following text has been added to 4.2.10: <u>“Parish Design Statements, made Neighbourhood Plans, or other locally produced guidance may provide a useful indication of local character for prospective applicants to consider. In addition, historic characterisation evidence and the Worcestershire Historic Environment Record (HER) provide a valuable resource for the identification of local heritage assets, which help define the many and varied elements of local distinctiveness across the District.”</u></p> <p>Noted – “odour” added to bullet point list in para.6.2.2.</p> <p>Noted – new information box included in Section 5 relating to guidance available from Historic England and Worcestershire County Council for conversion of rural buildings and issues relating to historic farmsteads.</p>

			document. Overall we find this is a comprehensive new reference that will be useful to bring 4 supplementary documents into one more useful one.		
07	Hagley Parish Council	BDC	<p>Hagley Parish Council have the following comments to make on this document:</p> <p>3.1.6 <i>Add</i> This is often achieved where the width of a building is increased by the extension being set down or set back.</p> <p>3.8 <i>Add</i> Alterations that can easily reversed to restore the Listed Building to its previous state are more likely to be acceptable than ones incapable of being reversed; also those removing modern alterations to restore it to an earlier state.</p> <p>4.2.12 could usefully be cross-referenced to 3.1.7.</p> <p>4.2.20 <i>Add</i> Where adjacent sites are being developed by different developers, the Council may require each to make a path as far as their boundary and dedicate it to the public.</p> <p>4.2.31 We welcome the prohibition of pocket parks.</p> <p>4.2.40 <i>add</i> The use of close boarded fences where there is already a live hedge should be avoided as the withdrawal of light from one side of the hedge will stunt its growth.</p> <p>4.2.48-50 are covering the same ground as at around 3.1.7. Would it not be better to cross-reference to that?</p> <p>4.2.55 Several Parish Councils in the District are Lighting Authorities. In such cases the lights should conform to their standards.</p> <p>4.2.56 see comment on 4.2.40.</p> <p>4.2.64 <i>Add</i> Consideration should be given to orienting roofs so that they can house solar panels, even if their inclusion is not part of the scheme.</p> <p>4 <i>addition</i>. There has in recent years been a spate of applications to convert urban outbuildings (e.g. garages and stables) to dwellings. Chapter 5 does not apply to these as they are often urban, but some further criteria on these may be necessary:</p> <ul style="list-style-type: none"> ·Granny flat condition – that a building converted under special circumstances for the needs of an elderly or disabled relative should remain in common occupation with the main dwelling. ·Extensions to outbuildings converted to dwellings will not normally be allowed. <p>5.8 <i>Refer also to</i> doors to threshing bays. These may not in fact be for waggons, but have large doors on each side to enable the wind to pass through to aid winnowing.</p>		<p>Noted – no change</p> <p>Noted – however this change is considered too prescriptive. Paragraph 3.8 already requires applicants to discuss proposals with the Council’s Conservation Officer(s) where works are proposed to a Listed Building.</p> <p>Noted – no change. It is necessary for the SPD in some instances to repeat an issue already raised earlier in the SPD, dependent on the nature of that section of the SPD, e.g. Section 3 Residential Development – Alterations and Extensions as opposed to Section 4 Residential Development – Creation of New Dwellings.</p> <p>Noted – no change. This would require a change in higher level policy, e.g. the BDP, to enforce such a requirement on a new development.</p> <p>Noted – no change</p> <p>Noted – change made to 4.2.42 to include ecological considerations in relation to boundary treatments.</p> <p>Noted – no change. See comment above in response to suggested change at 4.2.12.</p> <p>Noted – add following text to 4.2.55: There should be a clear strategy, <u>addressing relevant standards</u>, for the provision of lighting within an area...”</p> <p>Noted – see response to 4.2.40.</p> <p>Noted – considered that the issue of orientation to improve energy efficiency is already covered by para.4.2.61.</p> <p>Noted – whilst not covered by Section 5, urban outbuildings are covered by 3.6 within Section 3 concerning extensions and alterations to residential development. No further change necessary.</p> <p>Noted – text added to end of para.5.8 <u>“This may also apply to large doorways which were a feature of threshing bays and essential as part of the winnowing process”</u>.</p>

			<p>6.3 CPRE has had cases in other parts of Worcestershire of large chicken rearing establishments in rural locations without adequate provision having been made for servicing them, including disposing in an appropriate manner of waste (dung) arising.</p> <p>7.2 <i>Add</i> Hanging or projecting signs will not be permitted on the angles of buildings, where they will disproportionately hide the faacia of neighbours.</p> <p><i>This suggestion arises from a street in Stourbridge (in writer's ownership), where the façade bends back. This means that a projecting sign at the corner will tend to hide the fascia of a neighbour to their detriment.</i></p>		<p>Noted – no change.</p> <p>Noted – no change. Para.7.2.2 reflects that hanging signs should respect the character of an area, which by implication would include not having a negative impact on the fascia of neighbouring buildings.</p>
08	Catshill and North Marlbrook Parish Council	BDC	<p>Section 2. Preparing your application 2.3 Submitting an Application Paragraph 2.3.3 (Page 6) At line 2 Delete '<i>neighbouring properties</i>' and insert '<i>the affected neighbourhood i.e. properties facing the front, rear and adjacent to the application.</i></p> <p>Section 3. Residential Development – Alterations and Extensions 3.1 Key considerations for all extensions Paragraph 3.9.1 Extensions to non – designated heritage assets (Page 11) After '<i>applications</i>' on line 5 insert '<i>It is recommended that Parishes should submit their non - Heritage sites to BDC for listing.</i></p> <p>Section 4. Residential Development – Creation of New Dwellings 4.2 Key considerations for all new dwellings Layout and surroundings Paragraph 4.2.14 Streetscape (page 15) After '<i>street</i>' on line 6 insert '<i>It is highly recommended that all new buildings are identified by either a number or name plate to assist emergency services to speedily locate specific dwellings</i>' Amenity Private amenity space and spacing standards Paragraph 4.2.28 Page 16, delete this paragraph and insert the following: <i>Where possible, there should be garden areas at the front and rear of new buildings, especially in rural areas to aid local habitat. The rear garden should back onto other gardens or open spaces.</i> Paragraph 4.2.38 Page 17 Car parking After '<i>vehicle</i>' on line 5 insert '<i>all driveways should be made of permeable material in order to reduce the risk of flooding</i>'</p>		<p>Noted - Planning Officers must meet the requirements for consultation on a planning application as set out in Article 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However applications are dealt with on a case by case basis and Officers therefore have discretion to consult beyond these minimum requirements where it may be considered necessary; this includes properties that may be to the front, rear or adjacent to an application site.</p> <p>Noted – text added to end of para.3.9.1 as follows: “It should be noted that the Council will record non-designated assets as part of a living document, in line with the Local Heritage List Strategy which was adopted in 2016”.</p> <p>Noted - however this comment is considered to be too prescriptive for inclusion within the Design SPD.</p> <p>Noted – habitat and biodiversity considerations in the context of design are referred to elsewhere in the SPD; this sub-section relates to the scale and layout of private amenity space such as gardens.</p> <p>Noted - however this issue concerns permitted development rights, with attention drawn to Section 2.2 of the SPD.</p>
09	Worcestershire Wildlife Trust		<p>Whole Document – general comment We are generally pleased to support the tenor of this important document and the guidance provided in its various sections. We have made some recommendations for additional wording on the environment that we believe would be helpful and would provide useful guidance for applicants in relation to Policy 39 Built Environment (39.3 sub-section iii), which requires development to 'incorporate features of the natural environment including Green Infrastructure into the design to preserve and continue Redditch's unique landscape features.'</p>		<p>Noted.</p>

	<p>Para. 3.1.3. Page 9 We would recommend adding ‘protected and priority species’ to the list of example issues that may need to be taken into account. Such species, including bats and birds, are often found in dwellings and therefore extensions that might have an impact on roof spaces or eaves are capable of having significant effects that need to be considered. We note that this is picked up in Para. 3.1.12. but given the relatively high risk it would be helpful to highlight the issue here. Giving such matter a relatively high profile in the SPD would help demonstrate the council’s commitment to discharging its biodiversity duty under Section 40 of the Natural Environment Act 2006 and compliance with paras. 98 and 99 of ODPM Circular 06/2005.</p> <p>Para. 3.1.12. 12 We are pleased to support the wording in this paragraph but it may also be helpful to list examples of mitigation and enhancement steps that should be taken, e.g. retention of entrance points to bat roosts or the provision of swift bricks or house martin boxes.</p> <p>Para. 4.2.3 17 We would recommend adding wording to the effect that <i>‘layouts should respond to existing local green infrastructure, seeking to maintain and enhance ecological connectivity both within site and in the wider context. Public open space should be permeable to wildlife and well connected to surrounding ecological networks where appropriate’</i>. This would be in line with guidance in the NPPF (see for example para. 109) and would support the aspirations in Policy 39, part 39.3, sub-section iii. Whilst this could be captured under para. 4.2.31 we consider that it is more helpfully placed here given the overarching importance of ecological connectivity.</p> <p>Para. 4.2.40 Page 21. We welcome the weight given to retaining such features and there will be situations where their use as boundaries will be helpful. However we would counsel caution with using such features as the curtilage of a dwelling or dwellings because of the risk that householders will remove or reduce important features in future. This is a particular issue with mature hedges and large trees and we would recommend that these be maintained in public spaces (with secured management) where possible.</p> <p>Para. 4.2.52. 23 Lighting may also have significant adverse effects on wildlife and so care will be needed to avoid harm, especially to bats and other nocturnal species. It would therefore be worth adding <i>‘and wildlife’</i> after <i>‘residential developments’</i> in the first sentence. Expanding on this in a new paragraph would also be helpful. We would recommend wording along the lines of <i>‘The effects of new lighting on wildlife should be a key consideration in lighting strategies associated with development. Light-spill must be kept to a minimum and important corridors for bats and other wildlife (for example hedgerows, wetlands and woodland fringes) should not be illuminated unless lighting can be controlled so as to avoid harmful effects. Lighting decisions should be based on appropriate levels of biodiversity information in line with guidance and the law. A range of options for controlling light spill exist (for example timers and cowl) and these should be used as required.’</i></p> <p>Para. 4.2.56. Page 24. We would also suggest that reference be made to the ecological value of trees and hedges here. This may not be picked up by a standard arboricultural report but may be a significant consideration in the retention (or otherwise) of a tree or hedge.</p> <p>Para. 4.2.57. Page. 24. We are pleased to support this paragraph and the weight it attaches to the need for</p>	<p>Noted – text revised to add <u>“protected and priority species”</u></p> <p>Noted – text added to end of 3.1.12 as follows: <u>“...or mitigation measures are undertaken, such as retention of entrance points to bat roosts or the provision of swift bricks or house martin boxes”</u>.</p> <p>Noted, however it is considered the suggested wording would not sit appropriately in para.4.2.3. New para. inserted at 4.2.34 that incorporates suggested wording.</p> <p>Noted.</p> <p>Noted – suggested addition of “and wildlife” now added to this sentence at previous para.4.2.52.</p> <p>Noted - however it is not considered necessary for this SPD to have a separate para. for this issue. New text added to previous para.4.2.55 as follows: <u>“The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development.”</u></p> <p>Noted – however it is considered that the extent of ecological importance of a particular feature (i.e. whether it is worthy of retention or not) is considered to be outside the remit of this SPD.</p> <p>Noted – previous para.4.2.57 revised to refer to biodiversity <u>enhancement</u>, rather than just</p>
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	<p>landscaping to support biodiversity (we recommend that you add the word 'enhancement' after the word 'biodiversity') and the need for management to be secured.</p> <p>Para. 4.2.62. 24 We are pleased to support the commentary provided in this paragraph. We would however recommend that you add priorities set out in the Worcestershire Green Infrastructure Strategy by the Green Infrastructure Partnership alongside those of the BAP Partnership.</p> <p>Para. 5.17. 28 We welcome the tenor of this paragraph but we would recommend some changes to the wording as set out here. <i>'Old farm buildings are often used as roosts for owls or bats and provide valuable habitats for other birds and animals. A Preliminary Ecological Assessment (PEA) is likely to be required to identify the likely ecological potential of the site. PEAs are simple surveys that help to inform planning applications. Further specialist survey may then be needed for specific species identified. Survey work will need to be undertaken by an appropriately qualified ecologist at an appropriate time of year. Where the nature conservation interest is considerable, mitigation measures will be required or permission could be refused. In all cases there will be potential for biodiversity enhancement and the council will expect applicant to provide some enhancements in line with guidance in the NPPF (see for example paras 9, 109 and 118).'</i></p> <p>Para. 6.2.2. Page 32. We would recommend adding 'Biodiversity enhancement opportunities' to the list of considerations here. Large commercial buildings offer significant potential for species like birds (in particular swifts) and bats and it would be helpful to reflect this in the SPD. This would be in line with policy 39 and guidance given in the NPPF (see for example paras 9 and 109).</p> <p>Para 6.2.9 Page 32. We support the wording in this paragraph and welcome the guidance it gives.</p> <p>6.2.11 33 We would recommend the addition of new wording in the 2nd sentence of this paragraph so that it reads <i>'...impact on neighbours, the natural environment and the general appearance of the area...'</i> so as to better reflect the impact of noise on wildlife.</p> <p>Para. 6.2.16. Page 33 We would recommend the addition of some wording to this paragraph so that it reads <i>'...should relate to the wider physical, ecological and social context...'</i> so as to better reflect the need to integrate development with existing Green Infrastructure and ecological corridors. This would be in line with guidance in the NPPF (see para 109 for example).</p> <p>Para. 6.3.3. Page 34 We would recommend adding 'Biodiversity enhancement opportunities' to the list of considerations here. Agricultural buildings can offer significant potential for species like birds (in particular swallows and barn owls) and bats and it would be helpful to reflect this in the SPD. This would be in line with Policy 39 and guidance given in the</p>	<p>biodiversity.</p> <p>Noted – text added to previous para.4.2.62 as follows: <u>"...identified as priorities by the Worcestershire Biodiversity Partnership and in the Worcestershire Green Infrastructure Strategy"</u>...</p> <p>Noted – para.5.17 revised to read as follows: "Old farm buildings are often used as roosts for owls or bats and provide valuable habitats for other birds and animals. A Preliminary Ecological Assessment (PEA) is likely to be required to identify the likely ecological potential of the site. <u>PEAs are simple surveys that help to inform planning applications. Further specialist survey work may then be needed for specific species identified. Survey work will need to be undertaken by an appropriately qualified ecologist at an appropriate time of year.</u> Where the nature conservation interest is considerable, mitigation measures will be required or permission could be refused. <u>In all cases there will be potential for biodiversity enhancement and the council will expect applicants to heed the guidance contained in the NPPF."</u></p> <p>Add bullet point for 'biodiversity enhancement' in para.6.2.2.</p> <p>Noted.</p> <p>Noted – para.6.2.11 revised as follows: <u>"...impact on neighbours, the natural environment and the general appearance of the area."</u></p> <p>Noted – para.6.2.16 revised as follows: <u>"...should relate to the wider physical, <u>ecological</u>, and social context of the surrounding environment..."</u></p> <p>See 6.2.2 above – biodiversity enhancement also added to list at para.6.3.3.</p>
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			<p>NPPF (see for example paras 9 and 109).</p> <p>6.4.2 38 We would recommend amending the wording of the last sentence to read <i>'Fitting in with the character of the landscape and respecting existing ecological value should be key considerations of the design.'</i> This would better reflect the importance of small grassland parcels in Worcestershire. The county has 20% of the UK's remaining species rich neutral meadows (a habitat that has declined by 97% since the end of World War 2) and so appropriate steps must be taken to safeguard those that may be subject to development. Equine development may have a significant adverse impact on species-rich grasslands and so basing design on appropriate levels of survey and site understanding is essential.</p> <p>Para 6.4.7. Page 38 We would recommend amending the second sentence of this paragraph to read <i>'External lighting can make a site appear prominent in the landscape and affect wildlife and the valued sense of rurality.'</i> This would better reflect the impact of light pollution on important species such as bats.</p>		<p>Noted – suggested text added to para.6.4.2.</p> <p>Noted – para.6.4.7 revised as follows: “...can make a site appear prominent in the landscape and affect <u>wildlife</u> and the valued sense of rurality.”</p>
10	Anna Wardell-Hill Environmental Policy & Awareness Officer	BDC	<p>In response to the SPG draft there are a number of points to be made in relation to waste collection which are not conveyed in this document:</p> <ol style="list-style-type: none"> 1. Where individual bins are used there is no reference to how much capacity is required. The statutory service is 1 x 240L for refuse and 1 x 240L for recycling. There is also an option 240L bin for garden waste. For communal bins this is provided in 4.2.9a. 2. Where properties have individual bins, residents must present these at the kerbside on their collection day. Where there are apartments collection crews collect and return these to the bin storage point on their collection day. This has an impact on how long the bins are left out at the collection point and this does cause some issues for us. Often in key hold developments we come across incidents where a number of householders are placing bins in the only sensible location available to them on the public road - directly outside a neighbour's property. This often presents to us as complaints as there has been no forethought to provide a suitable location for bins to be located all day. They block the pavement, cause visual disturbance for the resident, vehicles and pedestrians and can result in littering as they are knocked over and moved during the course of the day. 3. 4.2.9 for communal bin areas, if storage space is restricted on the site then developers should consider underground storage facilities. 4. There is no mention of the service being primarily a public road end collection service. Adding this would give clarity to where bins are to be placed for collections. Residents are required to place their refuse on the curtilage of their property next to the nearest public highway. We do not normally provide collections from inside gated developments, private drives and unadopted roads therefore in such instances developers will need to identify suitable collection points adjacent to a highway for properties associated with these features. 		<p><i>Noted – a reference to the size/volume of bins is considered important in the context of communal bin storage due to the space requirements that should be considered in designing the location of such storage into a scheme. It is not however considered necessary to refer to the traditional size/volume of bins for individual properties, which will be served by the statutory collection service.</i></p> <p><i>Noted – new paragraph added between previous 4.2.6 and 4.2.7 as follows: <u>"Individual properties are required to place their bins 'at the kerbside' on refuse collection day to enable refuse lorries ease of access from the public highway. New developments should ensure there is adequate access for refuse collection vehicles, including turning space in cul-de-sac or key hole developments, or if not possible should provide a designated collection point."</u></i></p> <p><i>Noted – text added to end of 4.2.9 (g) as follows: <u>"...amenity of occupiers, such as through consideration of underground storage."</u></i></p> <p><i>Noted – new text added in relation to point 2 above which addresses this comment.</i></p>

			<p>5. The dimensions of the bins will be required to correctly allow for adequate storage:</p> <table border="1"> <thead> <tr> <th>Bin sizes available</th> <th>Dimension</th> <th>Bromsgrove</th> </tr> </thead> <tbody> <tr> <td>240 litre wheelie bin</td> <td>H mm</td> <td>1085</td> </tr> <tr> <td></td> <td>D mm</td> <td>795</td> </tr> <tr> <td></td> <td>W mm</td> <td>575</td> </tr> <tr> <td></td> <td>Footprint m²</td> <td>0.50</td> </tr> <tr> <td>1100 litre steel bins</td> <td>H mm</td> <td>1470</td> </tr> <tr> <td></td> <td>D mm</td> <td>1160</td> </tr> <tr> <td></td> <td>W mm</td> <td>1280</td> </tr> <tr> <td></td> <td>Footprint m²</td> <td>2.18</td> </tr> </tbody> </table> <p>We would ask for these points to be considered and amended to clearly reflect the statutory waste collection service and to assist developers in allowing adequate provision for storage and design features within their development. If any further information is required please don't hesitate to contact me on this matter.</p>	Bin sizes available	Dimension	Bromsgrove	240 litre wheelie bin	H mm	1085		D mm	795		W mm	575		Footprint m ²	0.50	1100 litre steel bins	H mm	1470		D mm	1160		W mm	1280		Footprint m ²	2.18		<p><i>Noted – however considered to be too detailed to include in a more general Design SPD. Consultation on planning applications will allow for the detail of refuse provision and storage, including size and volumes of bins, to be required of development.</i></p>
Bin sizes available	Dimension	Bromsgrove																														
240 litre wheelie bin	H mm	1085																														
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	D mm	1160																														
	W mm	1280																														
	Footprint m ²	2.18																														
11	The Coal Authority	BDC	<p>Thank you for your consultation received on the 22 January 2018 in respect of the above consultation.</p> <p>As you will be aware Bromsgrove area has limited coal mining legacy, with two mine entries and an area of coal outcrops, these features are located within the north of the district. We also note that these features are not located within areas where it is likely that development proposals will come forward.</p> <p>The Draft Bromsgrove High Quality Design Supplementary Planning Document includes, at BDP 19, consideration of the suitability of sites for development, in respect of such issues as contamination. We would generally seek to have land stability issues included within such a document, however, we appreciate that in this case the coal mining legacy present in the district is limited and somewhat isolated in location. On this basis we have no objection to the draft SPD as proposed.</p> <p>We would however expect any development proposals which may come forward in the areas where the coal mining legacy is present to be supported by a Coal Mining Risk Assessment, or equivalent report.</p>		<p>Comments noted, particularly regarding consideration of development proposals in areas of coal mining legacy.</p>																											
12	Worcestershire County Council	BDC	<p>Archive and Archaeology</p> <p>We recommend reference is made to Green Infrastructure as a mechanism to mitigate the environmental impact of new development and to enhance place and connectivity. We recommend reference to Worcestershire's strategic GI goals and signposting to the Worcestershire Green Infrastructure Strategy 2013 – 2018. We recommend reference and signposting to the Worcestershire Landscape Character Assessment and Worcestershire Historic Landscape Characterisation Assessment as planning tools to inform new development so that it responds to local character and distinctiveness. We recommend reference and signposting to the Worcestershire Farmstead</p>		<p>The County Council's Green Infrastructure Strategy is referred to at 4.2.62 (also see comment below in response to Green Infrastructure representation). Text concerning historic characterisation (and the Historic Environment Record) has been added at 4.2.12. The SPD has also been amended to include reference at Section 5 to the Worcestershire Farmstead Assessment Framework and other relevant guidance such as Historic England's 'Adapting Traditional Farm</p>																											

		<p>Assessment Framework to ensure that the historic character and setting of traditional farmsteads is considered at the earliest stages of development design.</p> <p>Green Infrastructure We would like to see further focus on site design and layout of residential, mixed use and commercial developments - in particular the integration of green infrastructure. It is crucial that the role of green infrastructure and its components (biodiversity, the historic environment, blue infrastructure (including sustainable drainage), landscape, access and recreation) within site design is referenced in the SPD. This would be supported by BDP24 Green Infrastructure and other related policies including BDP20 Managing the Historic Environment, BDP21 Natural Environment, PDP23 Water Management, BDP25 Health and Wellbeing, etc. We note that habitats, trees, hedges and landscaping are mentioned within the document but the real benefit of these and other GI features comes from the multifunctional role that they play within developments. For example, a swale that can be a part of sustainable drainage can also become a wildlife feature when planted with wild flowers, as well as a landscape feature making the development more attractive. This can benefit the applicants by increasing property/land values (due to greener and more attractive development) and by limiting the land they need to dedicate to multiple 'roles' required by the planning system, whilst benefiting the natural and built environment. As such, we would encourage the SPD to require the following:</p> <ul style="list-style-type: none"> - protection, buffering and enhancement of important green infrastructure features such as wildlife habitats, including trees, woodlands, hedges, grasslands, existing water features, streams, and ponds; and landscape features including views towards and from the site and designated and undesignated historic environment assets. - consideration of the functions delivered by the existing features on the site. - consideration and creation of other features which could be provided to deliver green infrastructure functions. - creation of green infrastructure networks and corridors and consideration of corridor connectivity on and off site (for example, the creation of tree canopy connectivity to serve as wildlife "hop-overs" or the creation of "fingers" of green space linking the centre of developments with other green areas on and off site). - consideration of the long-term maintenance and management of the green infrastructure of these corridors and assets. <p>These priorities should apply to all development, whether large or small. Whilst there are more opportunities to create multifunctional GI at the larger scale, small sites of a single dwelling or handful of dwellings can and should also deliver meaningful green infrastructure. Even a small grass verge or a single tree could be turned into a green infrastructure feature which links with other green areas in the locality and contributes to wider environmental goals.</p> <p>Health and well-being Health is in part determined by genetics, age and lifestyle, but also fundamentally by the environments in which people live and work. There is therefore a need to plan for healthy developments and better living environments which enable people to make healthier lifestyle choices. Bromsgrove faces a number of health challenges, such as an ageing population, health inequality¹ and excess weight in adults², all of which could be reduced by creating health-promoting developments and environments. The National Planning Policy Framework (2012) sets out the Government's requirement to promote healthy communities and to draw on evidence of health and wellbeing needs. This is supported by Planning Practice Guidance which also emphasises the importance of health and wellbeing in planning. Bromsgrove District Plan policy BDP25 Health and Well Being also provides strong policy support for healthy developments.</p>		<p>Buildings'.</p> <p>Some of the more detailed Green Infrastructure considerations raised in this response go beyond the remit of the Design SPD, which aims to provide guidance principally for the implementation of Policy BDP19 High Quality Design, and not the more detailed natural environment considerations of the BDP's approach to green infrastructure (BDP24) and the natural environment (BDP21). Where changes have been made these are detailed below and also as changes made in response to other relevant representations, e.g. Natural England, Worcestershire Wildlife Trust.</p> <p>Para.4.2.20 revised as follows: <u>How networks, including Green Infrastructure networks, connect locally and more widely...</u>"</p> <p>Comments noted – it is agreed that parts of the SPD already contain guidance that covers the priorities for high quality design in terms of its impact on health and well-being. However as acknowledged in the consultation response, most of the suggested considerations would be better suited to a more specific SPD which could provide more detailed guidance on Policy BDP25 Health and Well Being, as they fall outside the remit of this Design SPD.</p>
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		<p>We recommend that a section is included within the High Quality Design SPD to improve understanding of policy BDP 25 and other relevant policies within the Local Plan from a health and wellbeing point of view. This additional section should include guidance relating to the health-promoting design of buildings, developments and the public realm, and should cover the following (although we appreciate that some of these priorities are, to some extent, already covered within the SPD):</p> <ul style="list-style-type: none"> - The provision, quality and accessibility of green spaces, community facilities and play areas. - The design of buildings and developments to ensure they cater for the needs of all population groups throughout their lives. Lifetime homes standards³ could be referred to in this section. - Age-friendly developments, including the provision of safe and walkable environments including benches and shading; the provision of opportunities for social cohesion including parks, seating areas and community gardens and orchards; ensuring that bus stops are within walking distance; and the provision of segregated walking and cycling routes within developments. - Site design which promotes physical activity by encouraging walking and cycling. - Supporting healthy foods through provision of allotments, community orchards and street fruit trees. <p>We also suggest that the planning authority considers developing a Supplementary Planning Document for Health to provide guidance on links between planning and health that are wider than just design, and to help interpret the Bromsgrove District Plan policies from a public health perspective.</p> <p>Worcestershire County Council's Strategic Planning and Public Health teams worked collaboratively with the South Worcestershire authorities to develop a 'Planning for Health in South Worcestershire' SPD. The SPD has been adopted by all three South Worcestershire authorities and it is currently used to inform planning decisions. We suggest that Bromsgrove District Council follows a similar approach to developing the Health SPD. The South Worcestershire Health SPD can be viewed via this link: http://www.swdevelopmentplan.org/wp-content/uploads/2017/09/Adopted-Planning-for-Health-SPD-Sept-2017.pdf</p> <p>Additionally, we recommended that a Health Impact Assessment Screening requirement is introduced, either through the existing High Quality Design SPD or in any future Health SPD. We would encourage HIA screening to be undertaken for large housing, mixed-use, commercial, and industrial developments, including shops, takeaways, leisure facilities and other relevant proposals.</p> <p>Health Impact Assessment (HIA) is a structured way of predicting the health implications of a planning proposal on a population. HIA should aim to enhance the positive aspects of a proposal through assessment, while avoiding or minimising any negative impacts, with particular emphasis on disadvantaged sections of communities that might be affected.</p> <p>HIA Screening is a process to determine the scale of health and wellbeing impacts generated by the development proposal. A HIA Screening should be undertaken and submitted by the applicants. If the screening exercise identifies significant health and wellbeing impacts on the local population, it may lead to the applicant being asked to undertake a full HIA.</p> <p>The South Worcestershire HIA Screening template, which could be adapted for Bromsgrove District Council's purposes, can be found here: http://www.swdevelopmentplan.org/wp-content/uploads/2017/10/Health-SPD-HIA-Screening-Template-Oct-2017.pdf</p> <p>Section-by-section comments PD Box at top of page 7 It would seem more logical for the order of these two bullet points to be swapped, as the first bullet point talks about specific PD issues before the idea of PD itself has been explained in the second bullet point. Similarly, the first bullet point launches straight into what happens when the 45 degree code is broken, before explaining</p>		<p>Provision is made within Policy BDP19 for issues such as age-friendly developments. In particular, the sub clauses of BDP19 at g), j), k), and m) are considered especially relevant in this context.</p> <p>Noted - PD boxes removed from document on presentation grounds.</p>
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	<p>what the 45 degree code actually is. 3.1.7. (iii) In other LPAs, the 45 degree code seems to be measured from the centre of the nearest window, rather than the closest edge. Is the closest edge approach well-established in Bromsgrove? 3.1.9 It may not be entirely clear what is meant by the sentence "Dormer windows should not be deeper than half the depth of the roof slope". Would a picture help to illustrate this point? PD Box at bottom of page 9 It is unclear why this box randomly appears here, after discussing green belt. The idea of PD has already been discussed in earlier pages, so may be better to add in any necessary references to front extensions there.</p> <p>3.6.4 This seems to duplicate the issues in 3.6.1.</p> <p>3.10 Extensions to previously converted rural buildings This section assumes that "rural buildings" are all of a certain type/age. Although para 3.10.1 refers to "most" rural buildings, thereby recognising that they are not all the same, the approach set out in the rest of the section does not seem to allow for any variation.</p> <p>Types of new dwelling box on page 12 The second bullet point in part B includes "no adverse impacts result from the development to either the proposed or existing dwelling(s)". The impacts on adjoining occupiers would seem important in this scenario.</p> <p>Types of new dwelling box on page 13 It is not clear why the fourth bullet point under part C only applies to large-scale development, as part (g) of policy BDP23 Water management seems to apply to all scales of development.</p> <p>4.2.12 This states that "overbearance and overshadowing are not issues", but presumably overbearance and overshadowing could be very significant issues, depending on the context? This seems to contradict paragraphs 4.2.48 - 4.2.50.</p> <p>4.2.18 Footpaths and cyclepaths should ideally be clearly separated, well signposted and well lit, to ensure that people can safely and comfortably use the routes.</p> <p>4.2.27 What is "private amenity space"?</p> <p>4.2.31 The inclusion of circular routes within parks would benefit the physical activity agenda and serve all population groups. The inclusion of benches placed so as to encourage human interaction would support community cohesion and help to address social isolation. Public open spaces should be easily accessible from new developments, but should also be easily accessible for communities surrounding the site.</p>		<p>Noted however no change considered necessary.</p> <p>This was due to an error with the layout of the document. However, following consultation it has been decided that PD boxes will be removed on presentation grounds.</p> <p>Noted and agreed – para.3.6.4 deleted to remove duplication</p> <p>Noted - however it is considered that the wording of para.3.10.1 is flexible enough to allow for the potentially different circumstances of extensions to previously converted rural buildings.</p> <p>Noted – it is considered that existing wording in this bullet point ("plot subdivision which adversely impacts the grain of the area will be strongly resisted") covers impact on adjoining occupiers.</p> <p>Noted – this bullet point now removed from SPD as the detail of flood risk management / SuDs requirements beyond the scope of this SPD.</p> <p>Punctuation typo – semi-colon replaced with comma so that previous para.4.2.12 reads: "Developments should work with the contours of the site to ensure overlooking, and overshadowing are not issues".</p> <p>Noted – previous para.4.2.18 revised as follows: "Integrated routes are preferable, that is those that run alongside vehicle routes <u>but are segregated from the highway, and are well signposted</u>".</p> <p>This refers to additional space within the curtilage of dwellings, such as gardens, as opposed to public areas of open space.</p> <p>Noted – para.4.2.31 refers to the Open Space SPD for further, more detailed consideration of the design and function of open spaces.</p>
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	<p>4.2.33 Benches and other street furniture should be designed to ensure their function is immediately identifiable, so that those with cognitive problems, such as people living with dementia, can easily recognise them. Benches should be placed on crossroads/in strategic places to allow those with cognitive problems to gather their thoughts and rest. Placing benches under street trees allows people to safely rest during hot summers – this is particularly important for vulnerable population groups, such as the elderly.</p> <p>4.2.46 This section states that "Where housing is proposed with main living rooms above ground floor level it is necessary to have a greater separation distance of 27.5 metres between opposing faces to achieve both privacy and adequate visual separation". Whilst privacy is clearly important here, it is unclear why adequate visual separation is an issue related to main living rooms being above the ground floor.</p> <p>4.2.52 - 4.2.55 This section should also recognise the impact of lighting on biodiversity (especially bats).</p> <p>4.2.66 This section may benefit from including a brief description of what 'Secured by Design' is.</p> <p>4.2.69 Point (ii) states that design features should ensure that "corners are built positively". It is unclear what this means. Point (ii) also states that "corners ... should not provide 'dead' frontages", but this seems duplicated in point (x). Point (viii) refers to "a change in road surface material", but the nature and location of any changes is unclear.</p> <p>5. Conversion of Rural Buildings to Residential Use Should this section actually be called "redundant agricultural buildings"? This seems to be what it's all about, whereas "rural buildings" could include almost anything (houses, pubs, churches, etc.).</p> <p>5.1 This states that "A well-designed conversion should retain the original, utilitarian character of the building", but not all buildings will be utilitarian purely because they are in the countryside.</p> <p>5.2 Part (a) states that "The building should have some intrinsic conservation value". Why is this a necessary requirement for conversion? The building may be of no particular merit, but may still be able to offer a decent home once converted, and conversion could be an opportunity for improvement.</p> <p>6.2.8 This states that "A balance of both hard and soft landscaping should be included to</p>		<p>Noted – previous para.4.2.33 revised as follows: <u>"...and to ensure it benefits from natural surveillance, whilst being functional for all users"</u>.</p> <p>New text has been added to end of previous para.4.2.55 as follows: <u>"The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development."</u></p> <p>Noted – a web link to the Secured by Design guidance is provided at this part of the SPD.</p> <p>Noted – point (ii) has been deleted and replaced with previous point (X) to remove duplication.</p> <p>Noted – point viii has been deleted as not relevant to surveillance.</p> <p>Noted – whilst the guidance in this section may predominantly relate to conversion of former agricultural use buildings in rural areas, the SPD does apply equally to cases of converting other 'rural buildings'.</p> <p>Noted - the rationale for the text at 5.1 is to ensure the original character and appearance of a rural building related to its previous function is retained as far as possible, i.e. not a building that is already used as a domestic dwelling. Whilst a conversion will change the use of the building, it should not wholly change the appearance of the building to that of an originally built domesticated dwelling.</p> <p>Noted – section 5 concerns rural buildings which will all have some intrinsic rural conservation/heritage value in terms of their impact on local character and distinctiveness, even where this is relatively minor.</p> <p>This term refers to spaces that are aesthetically</p>
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			<p>ensure that quality visual spaces are enhanced". It is unclear what "quality visual spaces" are.</p> <p>PD Box on page 27 It is unclear why this randomly appears here. Lots of things are covered by PD, so why single out front extensions in the section on agricultural buildings?</p> <p>6.3.8 It is unclear what "Over engineered buildings" are.</p> <p>7.1.5 This paragraph would more naturally appear before 7.1.2 (or they could be combined to a single paragraph, with 7.1.5 coming first).</p> <p>8.2 This paragraph doesn't seem to add anything or say much.</p> <p>Minor points Note spelling of "principal" (3.1.11(ii), 3.3.1, 3.6.3) We assume the figures and information boxes will have full titles in the final document, rather than the current "Figure 5", "Figure 6", "Please note", etc.</p>		<p>pleasing – amend wording in para.6.2.8 from “...quality visual spaces...” to “...attractive amenity spaces...”</p> <p>PD boxes removed from document on presentation grounds.</p> <p>Noted – add following text to para.6.3.8 “Materials should be appropriate for the purpose and reflect the intrinsic nature of agricultural buildings”.</p> <p>Noted – para.7.1.5 now combined with para.7.1.2 with the wording of 7.1.5 beginning the sentence.</p> <p>Noted – no change.</p> <p>Noted – spelling error corrected at 3.1.11(ii), 3.3.1 and 3.6.3.</p>
13	Historic England	BDC	<p>Many thanks for consulting Historic England on the above consultation, we have the following comments: We support clause ‘e’ in Policy BDP19 about the need to ‘ensure that development enhances the character and distinctiveness of the area’. Within paragraph 3.1.3 it may be better to refer to ‘heritage assets’ as a general term and then state such as listed buildings, conservation areas etc. Paragraph 3.1.11 touches upon the need to respect local character and local distinctiveness which we support as an important element of good design. Does the Council have up to date Conservation Management Plans and Appraisals, historic characterisation assessment, made Neighbourhood Development Plans that could be referenced to offer detail about what is locally distinctive in different areas of the Borough? Without specific information how will the Council be able to assess whether applications meet this criteria? We welcome the specifications raised in paragraph 3.7.1 and 3.7.2. Where significance is referenced, we recommend that it states, ‘including setting’ as this will often be a key consideration. We consider that it would be useful to provide additional detail about what should be contained in a Heritage Statement as well as a link to other documents that can offer further assistance in understanding significance and setting such as Historic England’s Good Practice Advice Notes 2 and 3 and Conservation Principles. Our comments are the same as above, for paragraphs 3.8.1 and 3.8.2, though we welcome the inclusion of a specific section dealing with extensions/ alterations to listed buildings. Is the Council preparing a local list of heritage assets? This would be useful in order for applicants to comply with paragraph 3.9.1. I attach a link below to advice from Historic England on how to prepare a Local List. https://historicengland.org.uk/listing/what-is-designation/local/local-designations/</p> <p>Section 3.10 deals with conversions to rural farm buildings, we would recommend that a section is included to deal with applications for conversions of historic farmsteads and attach some advice below from Historic England’s website. https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/</p>		<p>Noted – 3.1.3 now refers to ‘heritage assets’.</p> <p>Noted – 3.1.11 has been re-titled ‘Local Character’. Further more detailed text on how new development should take account of local character and distinctiveness has been added to Section 4 – see response to later comments re: 4.2.10.</p> <p>Noted – setting of conservation areas now referred to in both paragraphs 3.7.1 and 3.7.2.</p> <p>Noted – setting also referred to in context of Listed Buildings at 3.8.1.</p> <p>Noted – the Council will continue to work with local communities, including applicants, in recording non-designated assets as part of a living record of assets. As resources allow, the Council intends to produce a more formalised list of non-designated assets in line with the Local Heritage List Strategy (2016).</p> <p>Noted – see changes made in relation to Section 5 and reference to historic farmstead guidance.</p>

		<p>Section 4.2 deals with design for new dwellings, whether these comprise of one dwelling or a large scale development. How is the Council ensuring that these new developments are respecting local character and local distinctiveness across Bromsgrove, rather than standardised new build developments? Paragraph 4.2.10 should also refer to the historic environment and reference additional material so that applicants know what is locally distinctive about different areas, such as historic characterisation evidence.</p> <p>We further recommend that paragraph 4.2.11 refers to the setting of heritage assets and the importance of views and vistas in adding to the significance of heritage assets. Good Practice Advice Note 3 offers further advice on setting and views, of which some additional information may be useful to include here. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>Paragraph 4.2.56 refers to trees and hedges and important examples needing to be retained as part of developments, which we support. However, we recommend that the applicant refers to the Historic Environment Record to ascertain whether there are any important heritage features such as hedges on or near to development sites and how best to protect these assets and retain them within developments.</p> <p>We support the inclusion of section 4.3 but consider that it needs to include more detail than in its current form. Any development that may impact upon heritage assets, of any type, should be accompanied by a Heritage Statement that sets out the significance of affected heritage assets, including their setting and how the proposed development will affect heritage assets, as well as protect and enhance them. It would be useful for the Council to set out what they expect to be included within a Heritage Statement and that this will be required at the validation of a planning application. Additionally, Heritage Statements should be prepared by an appropriate qualified individual so that the information included is relevant and appropriate. New development could affect all types of heritage assets, not just those currently referenced and it may be that where Scheduled Monuments or non-designated archaeology may be affected that a desk based archaeological assessment is required, potentially with field trench surveys additionally. Similar text to that referenced in paragraph 5.4 later in the document may be appropriate.</p> <p>When referring to heritage assets within this section, it is the significance of heritage assets that need to be protected and where possible, enhanced, and this may include its setting. We would recommend amending the text in paragraph 4.3.2 to refer to the significance of listed buildings, including setting.</p> <p>Additionally, it may be helpful to include some photographic examples about the type of issues that you would normally deal with when receiving planning applications that affect heritage assets, in this respect and use the tick and cross approach to highlight what the Council considers to be positive or negative examples. We welcome the reference to pre application discussions with your Conservation Officer and are pleased to see that this vital service is being retained in house.</p> <p>In Section 5 we would recommend a specific paragraph on how to deal with historic farmsteads and the specific issues that applicants may face and the detail the Council will require in order to determine a planning application.</p> <p>We welcome the references to the historic environment within paragraph 6.1.8 and how it refers to any heritage assets. We would recommend that the paragraph relates to understanding the significance of heritage assets that may be affected, that can include the setting of heritage assets and we welcome the reference to Historic England’s own advice within this paragraph.</p> <p>Under the ‘please note’ section here there could also be developments within the</p>		<p>Noted – new text added following 4.2.10 referring to locally produced documents such as parish design statements or neighbourhood plans, as well as historic characterisation evidence and the HER, as a means of offering guidance on local character and distinctiveness.</p> <p>Noted – new text added following 4.2.11 referring to setting of heritage assets in relation to views and vistas.</p> <p>Noted – not considered necessary to include reference to HER at this part of document, however further text added to paragraph concerning ‘historic boundary features’ and the potential importance of boundary features to local character.</p> <p>Noted – both title and wording of Section 4.3 changed to include consideration of new development within the setting of both designated and non-designated heritage assets.</p> <p>Further text added at new paragraph 4.3.4 regarding Heritage Statements.</p> <p>Further text added at new paragraph 4.3.5 regarding sites of archaeological interest and the need to seek advice from Worcestershire County Council.</p> <p>4.3.2 is amended to refer to the setting of all heritage assets.</p> <p>Noted – information added at end of Section 5 highlighting guidance to be used in consideration of historic farmsteads, produced by both Historic England and Worcestershire County Council.</p> <p>Noted – 6.1.7 amended to refer to consideration of all heritage assets and their setting.</p>
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		<p>setting of Conservation Areas that would require a pre-application discussion and/ or a Heritage Statement, if the significance of the Conservation Area were to be affected and indeed a need to relate to all heritage assets rather than only two types. Paragraph 6.1.17 would benefit from re-wording to take account of the comments made through this representation and for clarity of intention as it is somewhat unclear in its present form.</p> <p>Figure 11 would need to reference the need to consider the significance of any heritage assets and how these may be affected by proposed development. Development to the rear, as shown in the illustration may be appropriate, but without understanding the impact to any heritage assets or the type of development proposed, it is difficult to make a judgement. It is also worth noting that setting does not refer to a visual outlook only and there may be examples where the planting/ screening prevents a visual relationship between a heritage asset and new development but where issues such as noise, smell etc. may still negatively impact upon a heritage asset.</p> <p>We support Section 6.7 and the varied references to the need to protect Conservation Areas and Listed Buildings from inappropriate shopfront development and we welcome this. We would recommend for clarity that the opening sentence of paragraph 6.7.1 is re-worded. We support the use of illustrations to reiterate the advice and would welcome the inclusion of photographic examples as well.</p> <p>We welcome the reference in paragraphs 7.1.4 and 7.2.4 and Section 7.5.</p> <p>Has the Council considered including specific information relating to the height of new development and what considerations may need to be taken into account? We are commenting on a variety of tall building applications and would welcome Council's setting out specific considerations to guide tall buildings in appropriate locations.</p> <p>Many thanks for the opportunity to comment and if you have any questions about our response please contact me on the above details.</p>		<p>Noted – figure 11 removed from document as not considered to add further to illustration at figure 10.</p> <p>Noted – change made to 6.7.1 to refer to ‘heritage assets’.</p> <p>Noted – however this is not considered to be a significant enough issue within the District to include in this SPD.</p>
14	Keith Sprason	<p>I ask that consideration is given to observations listed below including items relating to quality of development design and effect on the environment within our communities:</p> <ol style="list-style-type: none"> 1) My concerns with effective implementation of Local Plan BDP19 clauses; 2) Improvement to quality of application documentation; 3) Comments on current SPD Draft. <p>I believe these matters can be beneficially addressed within this SPD.</p> <p>1) implementation of BDP19 clauses.</p> <p>Policy BDP19 e : Following the principles of the NPPF, the clause aims to ensure that <i>"development enhances the character and distinctiveness of the local area"</i>. It is suggested that the presence of trees and hedges within existing settlements provides a prime element in establishing the distinctive character of an area.</p> <p>Policy BDP19 p : aims to ensure <i>"all trees that are appropriate ... are retained and integrated within new development"</i>.</p> <p>Aims of policies can be thwarted by a) pre-emptive felling and b) post application removal.</p> <p>a) It is not unknown for landowners/ developers to pre-emptively remove trees and hedges prior to making an application for development. Perfectly legal of course without TPO protection, yet potentially devastating to the established character of the area. Removal of such beneficially contributory features may adversely affect the locality's character and thereby potentially contrary to those policies.</p>		<p>Noted.</p> <p>Noted – para.4.2.56 (consultation version) recommends an Arboriculture Report is used in support of applications to help inform the health and amenity value of existing trees that should be retained and incorporated into the design and layout of development proposals. Furthermore, additional wording added to 4.2.56 as per suggestion of</p>

[Example of pre-emptive tree felling adversely affecting character - application refused twice - appeal rejected - result is loss to community!]



Before tree removal

After tree removal

b) Trees are sometimes shown to be retained on applications (and/or reference made in Design Statements) and then subsequently removed. This changes the nature of the application which may otherwise attracted adverse comment from consultees and public.

My view is that the laudable intentions of the above clauses to "enhance the character and distinctiveness" and "retain appropriate trees"/ tree groups can be readily circumnavigated unless trees are subject to a TPO. Whether these adopted clauses are workable is doubtful. It is suggested inclusion of clauses within the SPD should be considered to improve opportunity for compliance with the aims of the adopted clauses.

Standards for TPO designation are high. However, many trees/tree groups and hedges can be an asset, providing significant visually important contribution to the character and distinctiveness of an area without achieving TPO designation. It is suggested that such valuable features should be considered as "non-designated environmental assets"

[As with "non-designated heritage assets" referred to this SPD clauses 3.9.1, 4.3.3 and 6.1.7, "environmental assets" may be identified through submission of planning applications and/ or highlighted within a Neighbourhood Plan]

Suggested additional SPD Clauses to support BDP19 :



To help protect the interests of the wider community, it is suggested the SPD should include:

- a) *all applications should include a land survey of the full land area, showing trees;*
- b) *where trees and hedges have been pre-emptively removed, the application will be considered on the same basis as if the trees had not been previously*

respondent – see response to comment below (p.19 4.2.56).

	<p><i>removed.</i></p> <p>c) <i>any trees proposed for retention should not be removed without agreement of the Council. Any trees removed without permission may be required to be replaced by substantial trees.</i></p> <p>[Google would normally provide a good guide to the original visual contribution to the street scene]</p> <p>2) Application documentation :</p> <p>Inadequate information: The SPD aims to benefit the community by requiring developments to embrace good design. Very many applications do not show the relationship of the proposals to its neighbours and street scene. (see SPD 3.3.11) [A high quality of information may help Parish Councillors/ public gauge the suitability/ compatibility of the development proposals to the character of the area]</p> <p>It is suggested for all developments. the SPD should require applications to include :</p> <p>a) <i>a land survey which includes the outline of adjacent buildings, trees, hedges and</i></p> <p>b) <i>a street scene elevation including adjacent buildings.</i></p> <p>In cases where Design and Access Statements are not specifically required, can BDC request a Design Statement to be prepared by applicants to design reasoning (or lack of it) in sensitive situations?</p> <p>3) Comments on Draft :</p> <p>Page 9: Where PDRs allow porch extensions at front of property, (ref PD Box) the description "certain requirements" should be defined.</p> <p>Page 10: A simple associated diagram may improve interpretation of the Cl. 3.3.1</p> <p>Page 12: B) Small scale development- Plot subdivision - last line amend: <i>"Plot subdivision will be strongly resisted where the grain and established character of the existing area is adversely affected".</i></p> <p>Page 15: Ease of movement Cl. 4.2.16 - 19 add or incorporate with another clause <i>"Clear, spacious pedestrian routes should be regarded as a prominent element of the framework of the development layout positively linking to other new developments, existing built up and rural recreational routes. Major recreational footpaths should be segregated from vehicular traffic in larger developments"</i></p> <p>Page 17: Car Parking</p> <p>a) Parking bays to frontages of terraced dwellings can be overbearing and should avoided in new development.</p> <p>b) Cl.4.2.34 - last sentence "Incorporating garages into the main form of the dwellings should be avoided". Comment - there are many circumstances where integral garages are found within an existing settlement, maybe forming part of the established character of the area.</p> <p>Page 19: Trees, hedges and landscaping Cl. 4.2.56 After first sentence - add - <i>"Existing trees and hedges can provide maturity to a development and may be a fundamental contributor to the established character of the area."</i> [this applies to both extensions as well as all new developments]</p>		<p>Diagram already included at Figure 2 to illustrate text at para.3.3.1.</p> <p>Noted – existing wording considered strong enough to protect the existing grain / character of an area from the potential adverse impacts of plot subdivision.</p> <p>Noted - para.4.2.18 concerning footpaths and cycle paths revised as follows: "Integrated routes are preferable, that is those that run alongside vehicle routes <u>but are segregated from the highway, and are well signposted</u>".</p> <p>Noted – para.4.2.35 refers to parking bays "in appropriate circumstances".</p> <p>Noted - no change.</p> <p>Noted – previous para.4.2.56 revised to add suggested wording.</p>
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15	BDC/RBC Development Management Team		<p>Both of the EXISTING SPG's refer to the 45 degree guidance which itself derives from the Building Research Establishment's guide to good practice 'Site layout planning for daylight and sunlight' published in 1991. Many if not most Councils refer to the BRE guidance in their policy documents which has now become almost established practice – see Page 14 of the Bromsgrove SPG1 and also Page 13 of the Redditch SPG. The Redditch SPG is rather poorly worded because it refers to overbearing and loss of outlook, terms which should not be confused with overshadowing which is different. The reference to the 45 degree guidance in the Redditch SPG does at least however come under the 'umbrella' Para 4.3 titled overshadowing.</p> <p>The existing Bromsgrove SPG is more detailed and explicit and correctly refers to the 45 degree guidance where it should be on 'daylighting issues'.</p> <p>The problem with both draft versions is that the 45 degree reference comes under the section 'Overbearance' – 3.1.7 iii). It should come under part (ii) – <u>Overshadowing</u> which is a much more condensed version of the existing Bromsgrove SPG which deals with daylighting matters.</p> <p>Something I have also noted is that the Redditch and Bromsgrove SPG's current refer to both single and 2 storey extensions. The existing Redditch SPG states that a 60 degree line should be used for single storey extensions and 45 degree line for 2 storey. The existing Bromsgrove SPG states that you can apply the 45 degrees to both single and 2storey extensions.</p> <p>We have decided as a team NOT to apply the 45 degree code to single storey extensions, although it will apply to 2 storey extensions (and higher 3 storey extensions etc). Also a two storey extension to the front of a property can have the same impact on amenity as to the rear. Just because 'many' two storey extensions are to the rear, a two storey extension to the front or a two storey ext to the side can also impact, especially when a row of properties has a 'staggered' arrangement.</p> <p>Para.3.1.7 (under (ii) following point g)) should be amended as follows:</p> <p><u>To ensure that overshadowing does not occur, the District / Borough Council (delete as applicable) will refer to the Building Research Establishment's guide to good practice 'Site layout planning for daylight and sunlight' published in 1991.</u></p> <p>A 45 degree line is drawn from the closest edge of the nearest rear-habitable window of the neighbouring property, <u>in the direction of the proposed 2 (or higher) storey extension</u>. Habitable rooms do not include bathrooms, hallways, utility rooms and circulation space. If there are two rear windows in a room, the impact on the closer one would be considered. <u>See-Figure 1 on Page 8 provides illustrative advice in this respect.</u></p>		Noted – previous text relating to 45 degree code under 'Overbearance' sub-heading amended and moved under 'Overshadowing' at 3.1.7 as per suggested amendments.
16	BDC/RBC Conservation Officers	BDC and RBC	<p>3.10.2 This needs to be tighter, see comments below in respect of 5.2b otherwise it will undermine the conversion of rural buildings to residential buildings section. In the second to last line the word 'selected' needs to be inserted between thoughtfully and reclaimed.</p> <p>4.3 This omits new development near to conservation areas. I would suggest 'or near' in the heading above. The note box at the bottom of page 20 also needs to be</p>		<p>Noted – wording of 3.10.2 follows on from 3.10.1 which already states that "Extensions will not normally be permitted as these detract from the plain, simple and utilitarian appearance of most rural buildings". 'Selected' added to last sentence of 3.10.2 as per suggestion.</p> <p>Noted – heading of 4.3 amended as follows: "New dwellings within or near the setting of designated and</p>

		<p>reworded to “Proposals within or near a conservation area or near a listed building should be.....”</p> <p>4.3.1 Following on from the above, “or within their setting” should be added to the first line.</p> <p>5.2 (a) We do occasionally find lone historic farm buildings, so I would suggest “or if a lone building is of traditional form or character”.</p> <p>5.2 (b) We are still of the view that section 3.7 in the existing SPG4 is more appropriate, “Extensions will not normally be permitted as these would detract from the plain, simple and utilitarian appearance of most rural buildings”. The existing wording I feel will encourage extensions.</p> <p>5.5 In respect of windows and doors the rest of section 3.3 needs to be added, “New windows and door openings should preferably be located on the ‘inside’ elevations away from public view. Window and door frames should be painted/stained a dark colour to decrease visual impact and should be recessed behind the main face of the brickwork”.</p> <p>5.12 – 5.15 We note that sections 5.12 to 5.15 cover landscaping in its broadest respects. For completeness I would suggest including the old section 3.13, “Traditional farm buildings are sited with yards or in open fields. To avoid domesticity, the curtilage of a converted farm building should remain open and uncluttered. There may be scope for private areas, but these should be screened with hedging and walls of old bricks.”</p> <p>Section 5 This section does not cover garaging, and I would suggest the addition of 3.14 of the existing guidance, “Where residential use is proposed garaging requirements should be carefully considered. It may prove possible to incorporate an integral garage, perhaps by making use of an existing opening in a lean-to. Alternatively it may be possible to use an ancillary building such as an open cart shed for garaging.” New buildings for garages should not be permitted.</p> <p>6.6 We would suggest amalgamating Section 6.6 Shopfronts with Section 7 Advertisements and Signage, as these sections overlap to a great extent. In their current form these sections do not read coherently, for example hanging signs are adverts but are attached to the building and need to relate to it. Fascias are covered in shopfronts, but are a form of advertising.</p> <p>6.6.2 You might want to insert for clarification section 2.3 from SPG 2 “If a traditional style replacement is to be used, it should be appropriate to the building and locality. It must never appear to be of earlier date than the rest of the building”.</p> <p>6.6.4 In respect of the last bullet point we have been trying to avoid, in these situations, the two or more shopfronts looking the same, so would suggest the addition of “There should be a variation in the design of the individual shopfronts”.</p>		<p>non-designated heritage assets”</p> <p>Noted – suggested change made to 4.3.1. Further text added at new paragraph 4.3.4 regarding heritage statements to include consideration of the setting of heritage assets.</p> <p>Noted – suggested change made to 5.2 (a).</p> <p>Noted – suggested text added to 5.2 (b).</p> <p>Noted – suggested text added to 5.5.</p> <p>Noted – suggested text added following paragraph 5.13.</p> <p>Noted – suggested text added following paragraph 5.13.</p> <p>Noted – no change.</p> <p>Noted – suggested change made at 6.6.2</p> <p>Noted – suggested change made at 6.6.4</p>
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		<p>6.6.4 – new bullet point suggested: “Extensive glazing should be avoided so that a shopfront looks structurally supported whilst also framing the display window.”</p> <p>We think section 4.7 from SPG 2 on stallrisers should also be added bearing in mind it appears in the illustration on page 36. “A stallriser gives protection to a shop window and creates a solid visual base to a building. Stallrisers often consist of panelled timber or brick forming a deep moulded skirting which is painted. Occasionally glazed tiles or marble are used. The depth of stallriser must be in sympathy with the overall design of the shopfront and the inclusion of a stallriser in the door may also be appropriate”.</p> <p>6.6.7 The original guidance suggested that fascias should generally be no more than 600mm deep. From my experience, particularly in the Bromsgrove High Street Conservation Area this has worked well. We would therefore suggest that this is added to this section. ‘Fascias should not generally exceed 0.6 metres (2 feet) in depth’</p> <p>In addition no mention has been made of lettering in this guidance, and again the section in the original guidance, from my experience has worked well and I would therefore suggest that this is also added, “Lettering should generally be restricted to a maximum height of 0.3 metres (12 inches) unless exceptional circumstances prevail e.g. large scale building”. No mention is made of materials for lettering is mentioned and we would suggest, “The materials for the lettering should be appropriate to the context of the area. Hand painted lettering on fascias will be encouraged”.</p> <p>6.6.9 The use of gates to recessed doorways is not mentioned in this section and has been an issue in the Bromsgrove High Street Conservation Area where there are recessed doorways, a common feature in historic shopfronts. We would therefore suggest the following bullet point, “Where a shopfront has a recessed door, a metal gate, of an open design can be considered”.</p> <p>6.7.4 For greater clarity we think section 6.2 (of SPG2) should also be added here maybe as an extra bullet point, “The fascia is possibly the most noticeable element of a shopfront. Traditional fascias are narrow in depth and should not exceed 0.6m (2ft.). It is usual for the fascia to have a projection above it, normally in the form of a moulded cornice which is both decorative and functional. Georgian and early Victorian fascias were traditionally positioned upright on top of pilasters with plain or decorated ends. Later Victorian fascias were put in console boxes and tilted forwards”.</p> <p>6.7.5 We would delete the last sentence, ‘Hardwoods were never painted’. As we are seeing an increasing use of hardwoods which can be painted.</p> <p>We would suggest including section 4.14 here or within section 6.6, “The two main considerations in determining the exterior finish of shopfronts are location and appearance. The traditional approach has been to favour a painted finish but care should be taken to respect local tradition and it should be borne in mind that high-gloss paints and varnishes and particularly brilliant whites are not appropriate for period properties. Matt or semi-gloss will give the best results”.</p> <p>6.7.6 Third line after listed buildings add, ‘or conservation areas’.</p>		<p>Noted – new bullet point added at 6.6.4</p> <p>Noted – new paragraph at 6.7.5 added.</p> <p>Noted – suggested text added following 6.6.7</p> <p>Noted – suggested text added following 6.6.7</p> <p>Noted – suggested text added as new bullet point</p> <p>Noted – no change.</p> <p>Noted – text deleted at 6.7.5</p> <p>Noted – suggested text added following 6.7.5</p> <p>Noted – suggested text added.</p>
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		<p>7.1.2 'Sings' should be 'signs' in the second line.</p> <p>7.2.4 We would omit wrought iron as this is almost possible to obtain, we would suggest saying, "an appropriately designed metal bracket" instead.</p> <p>Again our existing guidance in respect of hanging or projecting signs, 'Normally projecting signs should not exceed 0.4 sq. metres (4.3 sq. feet).' Again this seems to have worked well. Occasionally larger signs have been permitted where they have been in proportion to the building or there has been historic evidence of larger signs</p> <p>No mention is made of illumination of signs. We would suggest this also follows SPG2 and something along the lines of, "Internally illuminated signs will not be permitted, however discreet top lighting will be considered", should be added.</p> <p>The inclusion of section 9.3 of SPG2 might want to be reconsidered especially in respect of retail parks and supermarket outlets, especially as some are in the proximity of LBs and CAs. No mention is made of signage and petrol filling stations and again you might want to look at section 9.6 of SPG 2. Finally, A-boards have been an issue in the past in Bromsgrove High Street, and you may want to consider mentioning this.</p> <p>7.5.2 Should 'and signage' be added after Advertisements?</p> <p>7.5.3 We would tighten up this section as we do not necessarily want to encourage lighting on all buildings within conservation areas. I would suggest, "Illumination will not normally be permitted. Consideration may be given to halo or down lit lighting but should..."</p>		<p>Noted – typo corrected at 7.1.2</p> <p>Noted – suggested change made at 7.2.4</p> <p>Noted – suggested text added following 7.2.4</p> <p>Noted – see text below re: 7.5.3</p> <p>Noted – issue covered in 7.3</p> <p>Noted – suggested text added at 7.5.2</p> <p>Noted – suggested text added at 7.5.3</p>
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Note: References to changes made to the SPDs as a result of consultation suggestions relate to paragraph numbers in consultation versions; paragraph numbering may have changed in final versions of the SPDs where text/paragraphs have been added or removed.

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Statements of Common Ground and the Plan Making Process

Relevant Portfolio Holder	Cllr Adam Kent
Portfolio Holder Consulted	No
Relevant Head of Service	Ruth Bamford
Wards Affected	All Wards
Ward Councillor Consulted	Not Applicable
Non-Key Decision	Yes

1. SUMMARY OF PROPOSALS

- 1.1 The Duty to Cooperate (DtC), introduced by the Localism Act in 2001, placed a legal duty on those engaged in plan making to work constructively together. The 2018 version of the National Planning Policy Framework (NPPF) introduced the need for Statements of Common Ground (SoCG) to be prepared to help document how cross boundary issues are being progressed under the DtC. The 2019 version of the NPPF retains the need for SoCGs to be prepared.
- 1.2 This report outlines that officers are and will continue to be engaged in DtC discussions and suggests a proposed approach about how the SoCG that Bromsgrove District Council (the Council) will need to prepare and/or enter into, will be managed and agreed.

2. RECOMMENDATION

1. **That Members note officer attendance is required at DtC/SoCG meetings where cross boundary issues and draft SoCG agreements are discussed and prepared.**
2. **That Council delegates to the Leader and Portfolio Holder for Planning, to sign off all relevant SoCG where cross boundary growth is not included.**
3. **That all SoCG which include agreements on cross boundary housing, employment or other development needs or any other key planning issue are reported to Council for consideration prior to signing.**

3. KEY ISSUES

Financial Implications

- 3.1 There are no direct financial implications associated with this report.

Cabinet**12th June 2019**

Legal Implications

- 3.2 The duty to cooperate was introduced by the Localism Act 2011, and is set out in an updated section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plans in the context of strategic cross boundary matters.

Service / Operational Implications

- 3.3 SoCG are required when plan making and will be a key consideration of the Inspector when holding the Examination in Public into the emerging local plan. It is both important that the Council is proactive in preparing its SoCG and also engaging in SoCG discussions with other authorities to allow the Councils local plan to progress smoothly and in good time.
- 3.4 Previously there have been concerns expressed that officers have been agreeing cross boundary housing numbers with other local authorities, which is simply not the case as any previous agreements have always been endorsed by Members through the Council decision making processes which surrounded the Bromsgrove District Plan (BDP) approval process.
- 3.5 The SoCG requirement was not a policy of government when the current BDP was being prepared and examined and therefore this is the first time that the Council has been expected to demonstrate cross boundary agreements in this way. Previously more simple DTC statements were prepared which explained how Councils were co-operating on plan making; as stated above any agreements for growth were articulated and agreed within the wording of the plan, which was then agreed by Members.
- 3.6 It is important for officers to engage in discussions around cross boundary development with officers of other local authorities. This is very important to be able to understand what challenges exist that need to be tackled in the plan making process. This report seeks to clarify the role of officers and Members in the process of reaching any cross boundary growth agreements.
- 3.7 The planning practice guidance outlines the broad scope that needs to be contained within a SoCG, this is intended to be a much more structured and focused approach to strategic planning than simple DTC statement. The scope is as follows:

a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);

b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;

c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);

d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;

e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;

f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;

g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and

h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

- 3.8 Appendix 1 contains guidance provided by the Planning Advisory Service (PAS) on the preparation of SoCG. The role of PAS is to 'provide consultancy and peer support, learning events and online resources to help local authorities understand and respond to planning reform'. PAS is directly funded by the Department for Communities and Local Government.
- 3.9 An element of this guidance advises on the importance of understanding the governance and sign off arrangements of SoCG. At this stage this is the only element of the SoCG process that this report is addressing.
- 3.10 In terms of Recommendation 1 above, it is important that officers have discussions with other authorities to understand and progress any cross boundary issues. It is envisaged that the outcome of those discussions will regularly be fed back through the Strategic Planning Steering Group (SPSG) and with the Portfolio Holder for Planning. It is envisaged that as part of these discussions the Councils draft SoCG will emerge and also

the draft SoCG from other authorities; again the SPSG will be the forum for discussion around any drafts.

- 3.11 Once the statements have progressed to a state where an agreement needs to be reached this will then be covered by Recommendations 2 to 3 above.
- Any SoCG which do not contain cross boundary cross and no other key planning issues can be signed off by either the Portfolio Holder for Planning or the Leader of the Council.
 - Any SoCG which contain cross boundary growth will have to be presented to the Council for wider consideration.
 - It could also be the case that other issues arise within a SoCG which are not specially providing cross boundary growth but where it is felt it should be highlighted to members in the formal decision making process. In that event it would be for the head of planning in conjunction with the portfolio holder and leader to present a report to the Council.

Customer / Equalities and Diversity Implications

- 3.12 There are no Customer / Equalities and Diversity Implications associated with this report.

4. RISK MANAGEMENT

- 4.1 The risks associated with not preparing SoCG documentation is not having a new Local Plan adopted and not having the Councils views incorporated into the plans of other councils.

5. APPENDICES

- 5.1 PAS Statement of Common Ground Advice and Template January 2019 v1.0

AUTHOR OF REPORT

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PAS
Statement of Common Ground
Advice and Template

January 2019

v1.0

PAS Statement of Common Ground Advice and Template

Under the 2018 National Planning Policy Framework (2018 NPPF) strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SCG) to highlight agreement on cross boundary strategic issues with neighbouring authorities and other relevant bodies.

The Planning Advisory Service (PAS) has produced this advice note and template to help local authorities to produce an SCG; based on what planning practice guidance expects an SCG to contain and from our experience working with groups of local authorities. It should be read alongside the relevant [NPPF](#) paragraph (Para 27) and Planning Practice Guidance ([Chapter on Maintaining Effective Cooperation](#)).

The Statement of Common Ground

A Statement of Common Ground (SCG) should be produced, published and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues. The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address them. It is the means by which authorities can demonstrate that their plans are based on effective and ongoing cooperation and that they have sought to produce strategies that as far as possible are based on agreements with other authorities.

The SCG should increase certainty and transparency, at an early stage in the plan-making process about where effective cooperation is and is not happening. It should highlight the cross boundary strategic planning matters in authorities' plans and outline the timetable for gaining agreement on different strategic matters, and providing commitment through relevant organisations giving signed agreement on the required issues.

The SCG is expected to be concise and expected to contain:

- A list of the planning authorities and any additional organisations that are signatories to the SCG.
- A list of individual signatories; names and roles of planning authority's political leaders and the relevant representatives of other strategic organisations.
- A list of the key strategic matters being covered,
- A short description and map showing the geography that the SCG covers and brief justification of the area.
- A description of the governance arrangements for cooperation and how the SCG will be kept up-to-date.
- A list of the housing requirements in any adopted and emerging plans, if applicable to the key strategic matters.
- An agreement of how housing need will be distributed across the area, including unmet need, or the process for agreeing the distribution across the area.

- A list of agreements that have or have not been reached on the key strategic matters and the activities undertaken to reach agreement. If no agreement has been reached, the proposed process and date for reaching agreement, or how this has affected the relevant strategic issues and the content of the plan.
- Any additional strategic matters that are deemed as required in the SCG, such as a brief description how the SCG relates to any other SCG covering all or part of the same area.

The SCG is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.

It is expected that in the majority of case an authority will only produce one SCG but it is in their discretion to produce more if it is felt that it would be the clearest way of expressing agreements on different strategic issues with different partners.

Local Authorities should have published their SCG on their website at the latest by the time they publish their draft plan (Regulation 19 stage) and it should support the LPAs Duty to Cooperate requirements. It should be an aid for an Inspector when examining an authority's plan; highlighting the required agreements on cross boundary strategic issues and sit together with an authority's Duty to Cooperate statement to show how the agreements have influenced the plan.

When agreed, a SCG could be used as evidence of effective co-operation between authorities to secure grants for infrastructure and delivery funding.

We hope that this note and template will help local authorities to prepare their SCGs. It should be adapted to individual needs and used as a prompt to ensure that the relevant information is included.

Statement of Common Ground

Advice Note

The note is structured against the headings of the template.

1. **Parties involved:** LPAs and other strategic bodies engaged in the SCG.
 2. **Signatories:** which might be related to specific issues and highlight where agreements have not been reached.
 3. **Strategic geography:** in a map with description and justification.
 4. **Strategic matters:** including housing requirement and distribution, key infrastructure requirements, relationships to other strategic issues.
 5. **Governance arrangements:** how the SCG has been agreed or will be agreed and kept up-to-date.
 6. **Time table for agreement, review and update:** as known or proposed related to LPAs plan timetables.
- **Other issues:** Waste & minerals Plans, Relationship between SCGs & facilitators.

1. Parties involved:

Local authorities and other strategic bodies that relate to the issues included in a document need to have been engaged in and agreed the SCG.

Strategic bodies other than the local authorities could be Local Enterprise Partnerships, Local Nature Partnerships, Marine Management Organisation, county councils, combined authorities, infrastructure providers, advisory bodies, plus others that have a role in the issues being planned for. The additional signatories will only need to agree with those parts of the SCG that are directly relevant to role and required cooperation.

2. Signatories:

The SCG needs to be signed by an agreed individual in a leadership position from each of the local authorities and strategic bodies. For the local planning authorities this will be a Councillor such as a leader or portfolio holder of the Council. The signatories give the public commitment that agreement has been or will sought to be reached.

Depending on the situation it might be that the signatories will need to be presented in a way to highlight where an agreement has not been reached by all parties, or where some signatories, planning authorities or other strategic bodies, might only be signatories related to specific issues.

It is really worth thinking early on about how a SCG will be agreed and what sign off requirements individual authorities will require, whether this can be through delegated authority or whether the SCG has to be agreed by a Cabinet or Full Council.

3. Strategic geography:

The SCG should include a map to show the geographical area covered by the document, showing the administrative boundaries, any key relationship with adjacent LPA areas and overlaying initiatives such as Growth Corridors. It should also include a brief description of the area and justification for the agreed area. The justification for the area will relate to the most appropriate functional geographical area to gather evidence and develop policies to address the strategic matters being planned for.

Authorities may well work in different groupings to address different strategic matters. They should be pragmatic in determining the areas which may be different for different issues.

4. Strategic matters:

Identifying the cross boundary strategic issues can prove to be quite complex, with the number and type of strategic cross-boundary issues potentially being extensive and very diverse. If the scope of the SCG is too broad the ability to produce a document that is clear and concise will be reduced. It is useful to set out agreed spatial priorities. This doesn't need to be lengthy but should demonstrate a collective shared view of long term priorities. In addition to setting out cross boundary issues, this could highlight initial unresolved issues and set out a clear strategy for when and how discussions to resolve them will take place.

If considered a relevant cross-boundary, strategic matter, a SCG is expected to set out the housing requirement in any adopted and emerging plan relevant to the area covered by the SCG and its distribution across the highlighted area. This should include information on individual authorities housing need based as a minimum on the Government's standardised Local Housing Need (LHN) figures and local plan targets (either agreed or emerging), the extent of any unmet need in the area, the ability for unmet need to be taken by other authorities in the area and any agreements or disagreements on how this is redistributed.

The SCG should also highlight key infrastructure requirements such as transport, community facilities, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, minerals and energy necessary to support housing, employment, retail, leisure and other commercial developments as well as cross boundary relationships to other strategic issues such as conservation and enhancement of the natural, built and historic environment and climate change.

The SCG should highlight evidence of activities undertaken to address cross boundary issues that are being covered. Such evidence could include:

- Producing or commissioning joint research and evidence to address cross-boundary matters.
- Jointly assessing the impacts of emerging policies.
- Preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated,

Such evidence should be referenced and highlighted, where possible, as web links in the appendix of the SCG.

5. Governance arrangements

The governance and management arrangements for a SCG are key to its implementation and effectiveness. The SCG needs to set out how it has been agreed or will be agreed and how it will be kept up-to-date. The arrangements must provide confidence that cooperation will be effective between the local authorities and other bodies. Some local authorities will already have close working relationship between the Councils and good communication between officers and Members, whereas others will need to facilitate and support this process.

It may be advisable to set up a specific management group and leadership group for the SCG. Most authorities will already have relevant officer and Member planning groups that meet which could appropriately take on this role.

The leadership group should be made up of relevant political leaders (Council Leaders or Portfolio Holders) that can make decisions or represent the document both to their Council and to the public. Early engagement of the leadership and governance group is strongly advisable.

The formation of a small group of officers who can co-ordinate the work on the SCG is useful. This is obviously a lot easier where these relationships already exist through active officer policy groups and other working groups. The groups are well placed to work collaboratively to create a robust SCG and demonstrate that they have met the Duty to Co-operate requirements. All parties involved need to be open and collaborative, sharing information and evidencing requirements where necessary, with all parties working towards the same collective goal.

To ensure the effective and timely production of a SCG, it is advisable to gain agreement by consensus for a single authority or individual to take the responsibility for requesting and collating data from all the authorities involved and to take responsibility for drafting and updating the document.

Each authority will need to appoint a main point of contact, who will take responsibility for that authority's inputs and review drafts. They will need to keep Leaders, Chief Executives, etc. aware of what they are hoping to achieve – and advise them of any significant emerging issues.

6. Time table for agreement, review and update

A timetable/programme for the development of the SCG should be included. This makes it clear that the SCG is a live document which is expected to be reviewed and updated on an ongoing basis.

An initial SCG should ideally be published as soon as the geographic area, the governance arrangements and key strategic issues have been agreed. Authorities can publish a SCG highlighting where issues still need to be agreed, including how and when they are expected to be agreed and the document updated.

The timetable/programme should include triggers for reviews of the SCG as well as known milestones. It needs to be updated at key stages in the plan making process relating to each individual authority's plan, when new evidence becomes available or decisions are made..

A table format may be helpful to express individual plan progress clearly and make updating easier (See section 6 Appendix 1). As new information on housing need and distribution becomes available it needs to be timetabled and added.

This is an appropriate place to also highlight and address the potential risks to progress and contingencies.

Local Authorities should ideally publish their SCG on their websites as soon as the area, governance arrangements and key strategic matters have been agreed and at the latest by the time they publish their draft plan to support the LPAs in meeting their Duty to Cooperate requirements. It should be an aid for an Inspector when examining an authority's plan; highlighting the required agreements on cross boundary strategic issues and sit together with an authority's Duty to Cooperate statement to show how the agreements have influenced the plan.

- **Other things:**

Minerals & Waste Plans – Relevant Local Authorities will be required to produce SCG for minerals and waste plans. Districts are additional signatories on SCG for county council's minerals and waste plans, along with aggregate working parties on minerals plans.

Relationships between SCGs – The links between overlapping and neighbouring SCG needs to be clearly explained, for example where wider strategic issues are effected, , such as major infrastructure or large environmental designations, or where Housing Market Areas split authorities. This could be explained through a map/diagrammatic form with relevant cross referencing to ensure consistency and co-ordination.

Arbiter/Facilitator role – Most SCG should be produced by local authorities without the need of an independent facilitator or arbiter to aid them. However, some complex arrangements may need this role. Authorities may use elected Mayors, combined authorities, county councils or consultants to act as an arbiter or facilitator to assist in the preparation of a SCG if required.

Appendix 1 Statement of Common Ground (suggested template)

1. **Parties involved:** LPAs and other strategic bodies engaged in the SCG.
2. **Signatories:** which might be related to specific issues and highlight where agreements have not been reached.
3. **Strategic geography:** in a map with description and justification.
4. **Strategic matters:** including housing requirement and distribution, key infrastructure requirements, relationships to other strategic issues.
5. **Governance arrangements:** how the SCG has been agreed or will be agreed and kept up-to- date.
6. **Time table for agreement, review and update:** as known or proposed related to LPAs plan timetables.

1. List of Parties involved:

list of LPAs and other bodies which have engaged in the SCG (details of each organisation can to be listed in an appendix)

2. Signatories:

Organisation, name, position, signature – cross-reference to specific issues

3. Strategic Geography

including a map, short description and justification for the strategic planning area that covers the SCG

4. Strategic Matters

Define the issues, (see NPPF Para 20 for strategic matters) including housing requirement and distribution, including any issues that remain unresolved and how the authority plans to manage these. Outline what the implications are of these unresolved matters.

Evidence of activities undertaken to address an issue should be highlighted such as:

- *Producing or commissioning joint research and evidence to address cross-boundary matters.*
- *Assessing impacts of emerging policies.*
- *Preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated,*

(Details of references and web links to key evidence can be listed in an appendix)

Example table of housing requirement and distribution

LPA	OAN	MHCLG LHN	Local Plan target	Plan status	Year	Plan period
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LPA 1	200	250	250	Reg.18 Consultation	2018	2016-2040
LPA 2	250	200	450	Adopted	2016	2012-2030
LPA 3	1,500	1,400	1,800	Reg.19 Consultation	2018	2014-2035
etc						
etc						
Totals	4,500	4,400	5,000			

5. Governance Arrangements

How decisions on the SCG will be managed and agreed

6. Timetable for review and ongoing cooperation

The timetable for gaining agreement and for the SCG to be reviewed, (ie Plan review, update and submission timetables), how strategic issues will be managed on an ongoing basis, the mechanisms being used to do this, how it will be monitored

Example of Plan Review, Update & Submission Dates

LPA	Present Plan Adoption	Proposed Plan Review Date	Target Reg.18 Date	Target Reg.19 Date	Target Submission Date
LPA 1	Dec 2018	Jan 2019	Mar 2019	Sept 2019	Jan 2020
LPA 2	June 2016	Dec 2020	June 2020	Dec 2021	Mar 2021
LPA 3	Dec 2014	Jan 2019	Mar 2019	Sept 2019	Jan 2020
LPA 4	Jan 2003	Jan 2019	April 2019	Oct 2019	Feb 2020
LPA 5	Nov 2018	Not known	Not known	Not known	Not known
etc					

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