

APPENDIX 2

Bromsgrove District Plan Review Update and further Consultation

1 Purpose

1.1 The purpose of this document is to provide an update on the key Strategic Issues which may guide the Bromsgrove District Plan (BDP) Review and outline the next steps towards developing a preferred spatial strategy and accompanying policies. The update below has been directly informed by the previous consultation on the Issues and Options which took place from September to November 2018. A separate report which outlines the key findings of this consultation can be viewed at www.bromsgrove.gov.uk/strategicplanning.

1.2 The considerations below are not policies and should not be read as such. They should be read as a possible direction of travel for strategic issues which could appear in the Preferred Option version of the BDP Review, providing the next 'step' in the plan making process. This paper only addresses Strategic Issues; there are many other issues which were highlighted during the issues and options consultation, which will be appropriately addressed later in the plan-making process.

1.3 If you submitted comments to the Council on matters not covered in this paper, you do not need to submit them again, we will return to the comments we received at an appropriate time in the future. However at this stage we would invite you to submit comments on any aspect of the document below.

2 What do we want to know from you?

2.1 Is the broad direction of travel as articulated below the correct high level approach?

2.2 If not, what else should be considered or included?

2.3 Are there any Strategic issues not mentioned below?

2.4 Are there any other pieces of evidence that you feel the Council will need?

3 Context

3.1 Reviewing the Bromsgrove District Plan is a requirement originally set out in the current version of the Plan in Policy BDP 3.1, because at that time the plan did not allocate enough housing land in locations not covered by Green Belt designation. Whilst it is still the intention of the BDP Review to allocate the unmet need of 2300 houses up to 2030, as explained in section 4 below the Plan should now look beyond the 2030 time period, and new end date of 2040 is now being suggested.

3.2 A requirement of government policy in the National Planning Policy Framework (NPPF) is to review plans to ensure they are kept up to date and relevant. Paragraphs 31 to 33 of the NPPF outlines the government approach to when and how plans should be reviewed, this states that plans should be considered for review at least every 5 years. When taking account of the need to consider a review of the BDP within 5 years coupled with the requirements of 3.1 of the BDP 2011 -2030, it is clear that the BDP needs to be reviewed now in order to maintain up to date plan coverage for the District.

4 Timeframe and Scale of the Plan Review

4.1 The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed Plan in 2023 meaning that original end date of 2030 is now not appropriate. In order to align with infrastructure planning at a Worcestershire County level which includes strategic Transport infrastructure, it is proposed that the new BDP will have likely start date of 2023 and an end date of 2040.

4.2 Reflecting responses received at Issues and Options stage, it is also proposed that the plan will only cover the geographic area covered by Bromsgrove District Council, although discussions under the duty to cooperate will establish any needs from other authorities which the plan could cater for.

5 Development Needs

5.1 Prior to compiling a comprehensive evidence base, the quantum and precise nature of development needed to meet the District's needs is unknown at the present time, but it is likely that site allocations will be needed for a range of land uses, including:

- Housing (including specialist accommodation for older persons, affordable housing, self-build homes Traveller sites, including Travelling Showpeople)
- Economic development uses (including offices, storage and distribution and industrial buildings)
- Retail
- Community facilities
- Leisure facilities

5.2 As required by the standardised methodology for local housing need in the NPPF, the reviewed BDP will need to provide for a minimum of 379 new dwellings per annum equalling 6443 up to the 2040. The Council notes the role of small sites in contributing to meeting housing needs of an area. The NPPF requires that Council's should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Applying the 10% requirement to Bromsgrove would mean approximately 640 dwellings would be provided on smaller sites. A detailed Housing Needs Assessment will be carried out to look into the housing issues across Bromsgrove District more closely, and establish any additional and specialist needs over and above those identified in the standardised methodology, this is a requirement of Planning Practice Guidance.

The Council notes the role of small sites in contributing to meeting housing needs of an area. The NPPF requires that Council's should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Applying the 10% requirement to Bromsgrove would mean approximately 640 dwellings would be provided on smaller sites."

5.3 The BDP will also look to provide a step change in employment delivery to ensure that Bromsgrove's economy can grow in a sustainable but positive manner. Basic economic forecasting would suggest that over the period to 2040 only a very small amount of additional employment land would be required. In order to investigate this step change further, more detailed scenarios have

been developed which suggest that the new employment land required for the District could be up to 90 hectares.

5.4 In the adopted BDP, the Council committed to consider its ability to accommodate some of the unmet housing requirement of the Greater Birmingham HMA. Alongside this and to ensure the District grows in a sustainable manner, the housing and employment growth will need to broadly align. It should therefore be emphasised that the above local housing need figure generated by the standard methodology is a minimum. It is anticipated that the housing requirement in the BDP Review will ultimately be higher than this, to reflect the following:

- any additional housing needs of Bromsgrove District identified in the Housing Needs Assessment or to align with the districts employment needs
- any requirement to partially meet the needs of the conurbation

5.5 NPPF Green Belt policy states that when reviewing plans and Green Belt boundaries; *where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.*; If this policy is to be complied with, additional land will also need to be taken out of the Green Belt for the post 2040 period.

6 Development Distribution

6.1 Whilst it is not possible at this stage to be definitive on where the above development needs will be accommodated, there was some general consensus that a combination of the some of the identified options at Issues and Options stage would be the most likely and favourable approach to meeting future development needs

6.2 There was clearer support for Options 1) *Focussing Development on Bromsgrove Town & Option 2) Focus Development on transport corridors and locations with good transport links.*

6.3 Option 5) *Focus development on the edge of the conurbation, along the border with Solihull/Birmingham and Dudley* was the most favoured approach for accommodating development to meet the needs of the Wider Housing Market Area.

6.4 There was also a level of support for Option 4) *Disperse development around the District, allocating some new growth to a variety of settlements to allow them to grow and sustain services*

6.5 It was generally accepted that Option 9 *Urban intensification - Focus development in existing urban areas and the potential to increase densities on allocated sites in the current BDP* would not be able to play a significant role in meeting future development needs. Overall there was the least support for Option 7 *Focus development in a new settlement* due to concerns about land take and timescales for delivery within the Plan Period.

6.6 What appears to be clear from the Issues and Options responses is that extensions to existing settlements are favoured over large scale interventions such as new settlements. Alongside the lack of support for a new settlement, it is also unrealistic to suggest that a new settlement in excess of 10,000 dwellings and the associated infrastructure could be delivered by 2040. Therefore it is suggested that the BDP Review will focus on a range of sites which can be delivered within the

timeframe of the Plan, rather than more fundamental intervention such as ‘new’ settlements in the order of 10 -15,000 dwellings. The final distribution will be informed by the evidence collected to inform the plan including the call for sites.

7 The Green Belt Exceptional Circumstances

7.1 A key element of the review is the future consideration of the Green Belt. The NPPF at para 137 requires that the following elements need to be considered to help establish if exceptional circumstances exist

“...whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

7.2 When taking into account the likely level of development needs across the District it would appear that a) above will not provide for the amount of land needed to accommodate the growth needs. The lack of previously developed land (PDL) has been a consistent feature of planning across Bromsgrove for a considerable period of time. This lack of PDL has led to Green Belt land being released in previous plans, and it is expected to be a feature of this plan review. This lack of PDL also draws into question b) above. Whilst some density optimization may increase the amount of development on available sites, the lack of available sites in the first place would suggest that this policy will not overcome need to realised Green Belt land.

7.3 Whilst discussions with neighbouring authorities will be an ongoing feature of the BDP review, through the preparation of the current Bromsgrove District Plan and other development plans across the West Midlands It has also been established, that neighbouring authorities are relying on more rural districts such as Bromsgrove District to accommodate the needs of the conurbation. Therefore it is unlikely that discussions as identified at c) will allow for the development needs of Bromsgrove to be met in non-Green Belt authorities elsewhere.

7.4 A conclusion that could be drawn from the above is the review of the BDP does have exceptional circumstances to support amending green belt boundaries to allow for future development needs.

8 The Call for Sites exercise and approach to Site Selection

8.1 Alongside the publication of this further consultation paper, the Council is launching a ‘Call for Sites’ exercise, where we are inviting landowners, their agents and the public to submit sites to us which they feel have development potential. To guide this process, we have produced a Call for Sites form and table of Identified Considerations. These Considerations provides guidance to

developers and landowners on some of the factors and constraints we will be using when assessing the submitted sites.

8.2 Potential sites for development will be drawn from a range of sources, namely:

- Sites submitted through the Call for Sites process
- Existing Strategic Housing Land Availability Assessment (SHLAA) sites
- Current allocations in the Bromsgrove District Plan
- Site identified by Planning Officers
- Any sites identified in emerging Neighbourhood Plans, and
- a review of Village Envelopes

8.3 It is anticipated that the Council will receive a high volume of sites for consideration, some of which may not represent sustainable locations or be consistent with the spatial strategy for the District which will emerge as the BDP Review progresses. A more specific methodology for selecting sites will develop as the evidence base is collected. This methodology will aid the consistent and objective assessment of sites in a timely manner to inform the BDP Review. The Preferred Option plan and its supporting evidence base, which is envisaged to be the next substantive stage after this consultation, will explain the approach that has been taken to site selection and provide justification for why sites have been included in the Plan or dismissed.

9 Evidence Base

9.1 The Council has begun to gather evidence to inform the BDP Review. A key piece of work since the Issues and Options consultation has been Stage 1 of the Green Belt Purposes Assessment which is now complete and published alongside this paper. This Assessment divides the District into strategic parcels and assesses them against relevant Green Belt purposes from the NPPF. At this stage the Stage 1 Green Belt Purposes Assessment does not look at the development prospects of any piece of land, this will follow as part of the Preferred Option preparation.

9.2 Over the coming months, the Council will gather further evidence to inform our policy approaches for the Preferred Option. Below is a list of the key pieces of evidence that are likely to be needed, it is also envisaged that additional evidence will emerge or be requires as the Plan progresses:

- Green Belt Purposes Assessment (Stage 2)
- Strategic Flood Risk Assessment
- Strategic Transport Assessment
- Infrastructure Delivery Plan
- Sustainability Appraisal
- Settlement Hierarchy Background Paper
- Housing Needs Assessment and Employment Needs Assessment
- Landscape Character Assessment / Landscape visual impact assessment
- Green Infrastructure Strategy
- Viability Assessment
- Site Selection Assessment
- Duty to Cooperate discussions

Are there any other pieces of evidence that you feel the Council will need?

10 Infrastructure provision

10.1 A clear theme from the Issues and Options responses is the need to plan comprehensively for future infrastructure and in particular transport infrastructure. Therefore the Plan will be prepared taking into account the ability to use existing infrastructure capacity. If, as is expected the existing capacity does not facilitate the levels of growth required, the distribution of future growth will be directly influenced by evidence such as the strategic transport assessment which establish the ability for existing capacity to be upgraded or new infrastructure provided in a sustainable and viable manner.

10.2 Infrastructure assessments will feed into the process for developing the spatial strategy and for choosing appropriate sites as early into the process as possible, ensuring that the Plan is making the best use of any existing infrastructure and that new infrastructure is clearly able to deliver the planned growth.

11 Neighbourhood planning

11.1 Neighbourhood planning is a growing feature of the planning system and in the district we now have one 'made' Neighbourhood Plan (NP) covering Alvechurch Parish and also the Lickey & Blackwell and Cofton Hackett NP currently at examination.

11.2 For those NP areas where progress is less advanced, and where there is a desire to prepare a NP, it will be preferable that NPs are prepared in tandem with the BDP Review. The NPPF 65 at para states that within the overall housing requirement for a local authority, "...strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations." In advance of up-to-date district-wide housing needs evidence being produced, and whilst the future spatial strategy for the district is emerging, it is not possible at this stage of the BDP Review to provide a housing requirement figure

11.3 However NPPF para 66 goes on to say that "where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by a neighbourhood planning body." It will be particularly important, where it is the intention of a NP to allocate land for development that any allocation(s) can contribute to meeting the strategic development needs in the BDP Review. The District Council will work closely with neighbourhood areas to ensure a local housing requirement is in conformity with the district's housing requirement and distribution of development.

12 Summary

To summarise, the broad direction of travel for the BDP Review is suggested as

- The necessity to review the current plan still exists.
- Plan for the period up to 2040.

- Identify land for housing needs using the standard methodology as a starting point and taking account of specialist local housing need, balancing housing with increased employment aspirations, and considering the housing needs of the conurbation.
- Removing additional land from the Green Belt to be held as safeguarded land to meet post-2040 development needs.
- Removing land from the Green Belt to allow for the above to happen.
- Continue with the Call for sites process and identifying possible sites from a range of sources.
- Continue to assemble the evidence base
- Infrastructure provision playing a key role in the development of the Strategy
- Continue to work with Neighbourhood planning groups and where possible align the development of the Neighbourhood plan with the plan review process, in order allocate suitable housing requirements to Neighbourhood Plan Areas, where appropriate.

13 **Next Steps**

13.1 The diagram below shows how we envisage the plan process being carried out in relation to the BDP Review. It can be seen from the diagram that following this consultation and the call for sites exercise the next substantive step is likely to be the preferred option.

13.2 Due to the complex nature of preparing a local plan the Council may decide to alter the process below if circumstances dictate that additional work of consultation is required. The Council's website www.bromsgrove.gov.uk/bdp will be updated as necessary to keep all those involved in the process as up to date as possible, please check the website regularly for updates on the plan's progress.

