

## **South Worcestershire Development Plan – Preferred Options**

### **Response from Bromsgrove District Council**

1 Bromsgrove District Council welcomes the opportunity to comment on the Preferred Options Document. Please note that these comments represent the views of Officers only at this stage and have not been subject to Member endorsement. It is planned to take this response to the meeting of Bromsgrove’s Cabinet on 15<sup>th</sup> January 2020 for approval and then to full Council on the 22<sup>nd</sup> January, and we will update you after this time. Whilst the Council does not have any initial significant concerns due to the location of the sites identified for future development, and any potential cross boundary impacts in the SWDP, we wish to raise a number of observations and comments as follows:

2 The Council considers that it may be necessary to further discuss the housing needs arising from the Greater Birmingham Housing Market Assessment (GBHMA) ahead of finalising the publication version of the South Worcestershire Development Plan. Bromsgrove District Council is currently reviewing its own Development Plan, which will include the requirement to potentially accommodate some of the wider housing needs of the GBHMA which have yet to be determined and apportioned. This is an issue which will need to form part of the engagement under the Duty to Cooperate.

3 The Adopted Bromsgrove Development Plan states that the District’s housing need will be met within Bromsgrove District through the Green Belt Review. However, the NPPF (2019) Paragraph 137 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, local authorities should be able to demonstrate that they have fully examined all other reasonable options for meeting their development needs. In particular Paragraph 137 c) states that this should be informed by discussions with neighbouring authorities about their ability to potentially accommodate some of the identified need for development.

4 Bromsgrove District Council has not yet tested any land within the Green Belt to assess its suitability for development. This is the process which will be taking place over in the coming months. It will be necessary for the Bromsgrove DC to demonstrate that it has satisfied these requirements through further engagement with the South Worcestershire Authorities under the duty to cooperate and with the production of a Statement of Common Ground.

5 The Council generally supports the Draft Vision. However, it is considered that in order to reflect Duty to Co-operate requirements that paragraph 3.5 may need to refer to the wider Housing Market Area rather than “South Worcestershire Residents” with regard to housing needs.

6 We generally support the Strategic Objectives, although in order for Worcester’s sub regional role to be promoted, the South Worcestershire Councils will also need to ensure that adequate housing supply is provided to match jobs growth through their plan review.

7 It is noted that under the Housing Issues and Options consultation summary, there is no further explanation as to why those respondents felt that there is a strong case for planning for more dwellings than the standard methodology suggests across South Worcestershire. It would be useful for this to be addressed through further evidence base work on the overall housing requirements.

8 We note that the net additional housing target for South Worcestershire is for 13,957 dwellings and for 295 hectares of employment land.

9 The settlement hierarchy and the planned approach to sustainable development are supported. In particular we note that Worcestershire Parkway and Throckmorton airfield have been identified as stand-alone settlements under Urban Area (2) category.

10 Policy SWDPR3: Strategic Transport Links is generally supported and in particular the intention to provide additional transport infrastructure. However, we would remind the South Worcestershire Councils it was agreed that the South Worcestershire authorities would share any outputs from County wide transport modelling. This is particularly important where proposals and new infrastructure provision may affect the A38; M5 or rail connections to the conurbation.

11 The policy for a new and expanded settlement at Worcestershire Parkway for 5,000 dwellings and 50 hectares of employment land, with the potential for further delivery beyond 2041 is noted. This includes many potential infrastructure requirements which are still to be established to support the level of development proposed. Transport requirements and improvements to the strategic road network will require further transport modelling to identify potential impacts on the surrounding strategic road network. The Council wishes to request early sight of this information prior to the development of the publication stage Plan in order to establish whether there would be any cross boundary implications arising. We will continue to work With Worcestershire County Council and all the Worcestershire authorities on securing a robust strategic Transport Assessment to inform all future development plans

12 Under the Duty to Cooperate BDC will shortly contact the South Worcestershire Council to discuss the content of this representation, and also the progress it is making on its own Plan making. The aim of this engagement being working up a Statements of Common Ground to support both the SWDP and the BDC plan review in due course.