

1. Bromsgrove District Council (BDC) welcomes the opportunity to comment on the Draft Black Country Plan (BCP). The BCP appears to be based around appropriate aims and objectives and provides a solid foundation on which to plan the future of the Black Country (BC) albeit BDC does have some reservations. BDC has reviewed the policies and proposals and has the following detailed comments to make.

Policy CSP1 – Development Strategy

2. The Council notes the development levels identified within policy CSP1 and the supporting text, in particular the 28,239 dwellings and 210 hectares of employment land to be accommodated outside of the plan area through the Duty to Cooperate.

3. The Council also note the comments made at para's 3.23, 3.25 and 3.27 and would wish to make the following observations

3.23 National planning policy requires this unmet housing and employment land need to be provided for across the Housing Market Area, Functional Economic Market Area (FEMA) and other areas with which the Black Country has a physical or functional relationship.

3.25 The BCA recognise that this approach may only address a proportion of the housing and employment shortfall, as it is inappropriate and beyond the powers of the BCA to establish the limits of sustainable development in neighbouring authorities.

4. Whilst the requirements of the national guidance are acknowledged it is also accepted that the BCP cannot physically allocate development for the needs of the BC in other local authorities development plans. However the current strategy in the BCP appears to be a very hands off approach at this stage. It is accepted that para 3.24 identifies that the Black Country Authorities (BCA) have worked under the duty to cooperate and that para 3.26 commits the BCA to further engagement to find the most appropriate and sustainable locations for housing and employment growth. As it stands the draft plan provides no guidance to other local authorities on any requirement for accommodating unmet BC growth, or any methodology for distributing the requirement between authorities, and only very limited information on where the growth should be located. To expect neighbouring authorities to consider whether its appropriate to provide growth for the BC with little or no guidance from the exporting authority falls short of what could be described as constructive engagement under the duty to cooperate.

5. Notwithstanding the above comments about the lack of direction the BCP plan gives on meeting the wider housing need at 3.25, para 3.27 then appears to suggest locations where the BCA are supportive of appropriate and sustainable locations for housing and employment growth which is suitable for the needs of the BC.

3.27 Reflecting the efforts of those neighbouring authorities who are supporting the delivery of the Black Country's wider housing and employment land need, where it is shown to be desirable, appropriate, sustainable and deliverable the BCA will support their neighbours in bringing forward land for housing and employment that sits adjacent to the existing administrative boundaries, and will work in partnership to ensure infrastructure needs are met in full across administrative boundaries.'

6. BDC notes the findings of the various studies which form the evidence base supporting the BCP. In particular the findings of the Black Country Green Belt Study, Landscape Sensitivity Assessment and Historic Landscape Characterisation Study. The outcomes of these studies which BDC has reviewed and has no reason to dispute at this stage, have effectively ruled out development on the southern edge of the BC in Dudley Metropolitan Borough adjacent to Bromsgrove District, With the exception of sites DUH206,207 and 209. The ruling out of this land means that the administrative boundary between Bromsgrove and the BC is not able to accommodate appropriate, sustainable and deliverable development, therefore the ability of BDC to accommodate the needs of the BC is critically damaged. BDC will continue to engage with all local authorities under the Duty to Cooperate but the Council is now struggling to see how it can now help meet the needs of the BC other than in locations which are not supported by the draft Black Country Plan.

Policy HOU1 and CSP3

7. Sites DUH206, DUH207 and DUH209 are being proposed to be taken out of the green belt and allocated for development of 115 houses. This has been done irrespective of the fact that (DUH209) was rated as causing very high harm to the GB, and all three sites are found to be within an Area of High Historic Landscape Value. This development is in close proximity to the settlement of Hagley which is within Bromsgrove District. Table 14 indicates that policy CSP3 provides further information regarding these allocations. CSP3 provide little detail on how it is expected that this site will be developed, it not clear how these allocations relate to the requirements of CSP3. BDC is aware that there is a significant policy base by which this allocation will be determined should a planning application be submitted, subject to the site being allocated.

8. BDC has also reviewed the site assessment work (Appendix A pages 96-107) accompanying these three sites, and would wish to understand the full impact on the infrastructure in the surrounding area, before forming a view on the suitability of these sites for allocation.

9. It is noted that the sites have been ranked as follows with the following comments in relation highways access and transportation and impact on the wider road network.

	Site Known as	Highways access and transportation		Impact on the wider road network	
		RAG Rating	Text	RAG Rating	Text
SA-0010-DUD-A / DUH206	Worcester Lane North	Green	Access via Worcester Lane,	Green	Potential junction improvement Racecourse Lane / Worcester Lane to North. To south Park Rd/ Worcester Rd
SA-0010-DUD-B / DUH207	Worcester Lane Central	Green	Access via Worcester Lane, potential mitigation junction improvement Racecourse Lane / Worcester Lane to North, To south Park Rd/ Worcester Rd	Green	Further information would be required to assess this
SA-0018-DUD-C / DUH209	Worcester Lane South	Green	Access via Worcester Lane. Loss of hedgerow should be kept to a minimum.	Green	If developed with call for sites site to north (SA-0010-DUD A and B) potential junction

					improvements Racecourse Lane/Worcester Lane to the north and to the south Park Rd/ Worcester Rd.
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10. For these sites to be ranked green, it is a requirement of the published methodology that they have for:

- highway access and transportation - No / negligible access constraint (Site Assessment Report – page 23)
- impact on the wider network - No / negligible impact (Site Assessment Report – page 24)

11. There is inconsistency in the narrative which accompanies these site assessments:

- Does the mitigation at the junctions north and south of the sites get assessed under the highways access and transportation section, or impact on the wider transport network section ? At the moment this is not clear or consistent.
- Irrespective of the point above, for a potential mitigation scheme to be identified, that would suggest that there is some form impact under either of the categories which is more than negligible, and therefore an amber rating would be more suitable.
- For site DUH207/SA-0010-DUD-B it appears no assessment has been carried out of the impact of the wider network and still the site is ranked green, it is concerning that this ranking can be determined without any assessment taking place.

12. BDC would suggest this assessment is re-run and the outcomes shared with BDC and other interested parties prior to the publication of the next stage of plan making.

13. Other elements of the infrastructure assessment also require clarification, the assessment of: Primary schools, Secondary Schools, GP/Health Centre/Walk in Centre, Strategic Centre/Employment areas, and Centre/Foodstore all refer to walk times which are achieved 'following any viable mitigation'. BDC would like clarification on what this mitigation is and that it is in fact viable. Unviable mitigation is not considered to be appropriate mitigation.

14. These comments are officer only comments at this stage, BDC members will be considering the formal response at committee meetings following the deadline for submission of comments, should any additional comments be required officers will submit them following these meetings.

15. Bromsgrove District Council remains committed to successful plan making and will continue to engage with the BCA under the Duty to Cooperate. Upon receipt of these and any additional comments, officers will be happy to meet with BCA representatives to discuss all the points raised in further detail.