

BROMSGROVE DISTRICT LOCAL PLAN – SUMMARY OF SCOPING CONSULTATION

OCTOBER 2026

Bromsgrove District Council

Contents

Section 1 – Introduction	2
1.1 Overview of Bromsgrove District Local Plan Scoping Consultation	2
Section 2 – Consultation bodies and other stakeholders invited to make representations	3
2.1 General and specific consultation bodies invited to make representations	3
2.2 Other consultation bodies who made representations	4
Section 3 – Summary of the main issues raised and BDC's response	6
3.1 Overview	6
3.2 Key priorities and challenges – Questions 1a and 1b	6
3.3 Vision and objectives – Questions 2a, 2b, 3a and 3b	11
3.4 Local Plan topic-based content – Questions 4a, 4b, 5a and 5b	19
3.5 Local Plan evidence base – Questions 6a and 6b	27
3.6 Consultation & engagement strategy – Questions 7a, 7b, 8a, 8b and 9	32
3.7 Responses to non-consultation questions	37
Section 4: Next steps	42
4.1 Next steps	42

Section 1 – Introduction

1.1 Overview of Bromsgrove District Local Plan Scoping Consultation

- 1.1.1 Bromsgrove District Council ('BDC') is in the process of reviewing and replacing the adopted Bromsgrove District Plan (2011–2030, adopted January 2017). The forthcoming Bromsgrove District Local Plan will be produced as a new style local plan in line with the Levelling-up and Regeneration Act 2023. It will be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2026, which came into force on 25th March 2026, and the Planning and Compulsory Purchase Act 2004 (as amended).
- 1.1.2 The scoping consultation is the first consultation in the preparation of the Local Plan under the new plan-making system. BDC undertook a six-week scoping consultation between 24th July and 4th September 2026. The Council invited representations on matters relevant to the preparation of the Local Plan, including what the Local Plan should contain, and how the Council should engage with stakeholders in the preparation of it, in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2026.
- 1.1.3 More specifically, the scoping consultation sought views on the key priorities and challenges facing the District; the vision and objectives for the Local Plan; the potential scope of locally specific topic-based policies; the evidence base needed to support the Local Plan; and the proposed consultation and engagement strategy. Questions were posed to help guide responses and to enable the Council to gather meaningful feedback as the Local Plan progresses.
- 1.1.4 The scoping consultation was concerned with establishing the scope and parameters of the Local Plan, rather than considering specific proposals such as the identification of development sites or the drafting of planning policies. Opportunities to comment on these matters will be provided through future consultation stages.
- 1.1.5 There were 252 individual respondents to the scoping consultation (149 from the public, 32 from consultation bodies and other stakeholders, and 71 on behalf of developers and landowners). Section 2 outlines the relevant consultation bodies that responded. Section 3 provides a summary of the main issues raised and BDC's response to representations received. Section 4 outlines the next steps.
- 1.1.6 This summary of scoping consultation should be read alongside the scoping document, available on the Council's website – <https://www.bromsgrove.gov.uk/BromsgrovePlan-scoping>.
- 1.1.7 The scoping consultation followed the publication of the Local Plan timetable and the notice of intention to commence local plan preparation on 29th June 2026, which are available to view on the Council's website – <https://www.bromsgrove.gov.uk/council/policy/strategic-planning/emerging-bromsgrove-district-local-plan/>.

Section 2 – Consultation bodies and other stakeholders invited to make representations

2.1 General and specific consultation bodies invited to make representations

- 2.1.1 The table below sets out the general consultation bodies and specific consultation bodies, as defined under regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2026, who were invited by email to make representations under regulation 20 (scoping consultation) and whether they responded to the scoping consultation.

General / specific consultation body consulted	Responded to the scoping consultation
Active Travel England	
Ofcom	
Openreach	
BT	
EE	
NOW TV	
O2	
Plusnet	
Sky	
TalkTalk	
Three	
Virgin Media	
Vodafone	
CTIL	
MBNL	
Canal & River Trust	
Civil Aviation Authority	
Coal Authority/ Mining Remediation Authority	
Sport England	
Environment Agency	
Forestry Commission	
Transport for West Midlands	
West Midlands Combined Authority	
Worcestershire County Council	
Warwickshire County Council	
Solihull Metropolitan Borough Council	
Birmingham City Council	
Dudley Metropolitan Borough Council	
Staffordshire County Council	
National Highways	
Historic England	
Homes England	
NHS Herefordshire and Worcestershire ICB	
National Grid Electricity Distribution (NGED)	
National Grid Electricity Transmission (NGET)	
Cadent Gas	
Severn Trent Water	

Marine Management Organisation	
Natural England	
Network Rail Infrastructure Limited	
Office for Nuclear Regulation	
Office of Rail and Road	
Stratford-on-Avon District Council	
Wychavon District Council	
Redditch Borough Council	
South Staffordshire District Council	
Wyre Forest District Council	
Worcestershire Regulatory Services	
Hagley Parish Council	
Clent Parish Council	
Romsley Parish Council	
Hunington Parish Council	
Frankley Parish Council	
Belbroughton and Fairfield Parish Council	
Dodford with Grafton Parish Council	
Bournheath Parish Council	
Catshill and North Marlbrook Parish Council	
Lickey and Blackwell Parish Council	
Stoke Parish Council	
Finstall Parish Council	
Bentley Pouncefoot Parish Council	
Tutnall and Cobley Parish Council	
Alvechurch Parish Council	
Beoley Parish Council	
Cofton Hackett Parish Council	
Barnt Green Parish Council	
Wythall Parish Council	
New Frankley in Birmingham Parish Council	
Kinver Parish Council	
Churchill and Blakedown Parish Council	
Broome Parish Council	
Chaddesley Corbett Parish Council	
Upton Warren Parish Council	
Dodderhill Parish Council	
Hanbury Parish Council	
Feckenham Parish Council	
Mappleborough Green Parish Council	
Tanworth-in-Arden Parish Council	
Tidbury Green Parish Council	
Dickens Heath Parish Council	
West Mercia Police	
Warwickshire Police	
West Midlands Police	
Staffordshire Police	
North Worcestershire Water Management	

2.2 Other consultation bodies who made representations

- 2.2.1 Any person or other stakeholders were able to make representations to the scoping consultation. The table below lists the other consultation bodies (not general or specific consultation bodies, public, developers/landowners/planning agents or other

stakeholders) who responded to the scoping consultation. For clarity, everyone on the Council's Local Plan consultation database were notified by email or letter, including members of the public, schools, GP surgeries & primary care networks, consultation bodies, developers / landowners / planning agents and other stakeholders.

Other consultation bodies	Responded to the scoping consultation
National Trust	
Campaign to Protect Rural England (CPRE)	
Walsall Council	
Worcester City Council	
Worcestershire Wildlife Trust	
Swifts Local Network: Swifts & Planning Group	

Section 3 – Summary of the main issues raised and BDC’s response

3.1 Overview

- 3.1.1 This section provides a summary of the main issues raised in the representations received by the questions asked in the scoping document and how BDC has had regard/response to those representations to date. Sub-section 3.7 provides an overview of the responses received that do not specifically relate to any of the scoping questions posed in the document. Please be aware, not all respondents answered all the questions set out in the scoping document/Smart Survey questionnaire which explains why the response rate by question does not tally with the number of respondents.
- 3.1.2 Please note, there were a substantial number of responses from/on behalf of developers and landowners which provide commentary to support the promotion of their site and/or frame answers to the scoping questions around their site. As set out in the scoping document, the scoping consultation did not address site-specific matters. These representations have been assessed, but site-related comments have not been summarised for the purpose of this summary document.
- 3.1.3 Similar to paragraph 3.1.2, some responses from the public cite objections to specific sites or settlement growth across the district. These responses have also been assessed, but aforementioned comments have not been summarised for the purpose of this document.

3.2 Key priorities and challenges – Questions 1a and 1b

- 3.2.1 The key priorities and challenges section of the scoping document (section 1) provided an overview of the issues raised during last year's Draft Development Strategy ('DDS') consultation. Bringing all work together, we identified a new list of priorities and challenges that we sought feedback on covering community infrastructure provision and capacity; transport and accessibility infrastructure; housing growth; economy and employment; town centres, local centres and settlements; environment, climate and landscape; design, heritage and place quality; green infrastructure, health and wellbeing; and community engagement and local involvement. The tables below provides a summary of matters raised and underneath BDC's response to questions 1a and 1b.

Question 1a: Have we got this right, are these the issues that matter to you? Yes / No / Unsure
Responses: 173
• Yes: 65% • No: 25% • Unsure: 10%

Question 1b: Are there any key challenges and priorities that you would add to this list?

Responses: 154

Summary of matters raised

Public responses

- Policing concerns including crime, anti-social behaviour, and road safety (particularly speeding, pavement parking and wheeling, cycling and pedestrian safety).
- Stronger emphasis on net zero targets, renewable energy, nature-based solutions, climate resilience, biodiversity protection and reducing environmental pollution.
- Concerns about potential loss of sports, leisure and recreational facilities to new housing developments.
- Housing delivery spread fairly across the whole district without overloading existing infrastructure or a new village.
- Concerns about a lack of green route provision within Bromsgrove Town.
- Concerns about the Council's ability to deliver planned growth and ensure promised infrastructure is provided.
- Greater transparency in evidence, decision-making and community engagement throughout the plan-making process.
- Proper discussions, not consultations, with local communities.
- Red lines needed for the public to rely on.
- Concerns that existing transport, education, healthcare and community infrastructure is already under pressure and that development should be infrastructure-led, with infrastructure delivered before or alongside growth.
- Concern that proposed numbers of housing are exceeding Government requirements, and the Plan does not address current issues.
- Objections to the scoping document must be incorporated before the scoping requirements are finalised.
- Support for an appropriate housing mix, including affordable, high-quality housing for younger people, provision for SEN needs, and homes suited to local communities.
- Concerns about LGR reform impact on the development of the Local Plan. Local Plan should be reconsidered in the context of a North Worcestershire Unitary Local Plan.
- Note an absence of post-16/adult education provision, only the mention of school places.
- Concerns that proposed development will require a new hospital to be built.
- Need for working with county and national highways and neighbouring LPAs to accommodate proposed development.
- Preference for small site developments.
- Meeting these challenges alone will be substantial.
- No clear justification for the entire work.
- Prioritisation of improving local/district centres, for instance limited banking options.
- Concerns about developments adjacent to recent wildfire afflicted areas in the Lickey Hills.
- Concerns about ongoing detrimental impact of BREP on Bromsgrove Town residents. Concerns about a lack of meaningful engagement with residents about BREP.
- Concerns that active travel is given too much priority over motorised traffic.

Concerns that speculative development is not being considered in the proposed housing numbers.
Unsuitable geological conditions.
More evidence now available from WCC Highways.
Design code for new builds and protection of non-designated heritage assets and unclassified historic buildings. Define local identities.
Greater protection of Green Belt land, green spaces, agricultural land, biodiversity, heritage assets, landscape, local identity and settlement character, including a brownfield-first approach.
Priorities must include: a transparent site-selection methodology, a Green Belt exceptional-circumstances test, and an infrastructure-first requirement. Missing challenges include landscape sensitivity, car-dependence, infrastructure constraints, and senior housing.
Recommend strengthening: ageing population needs, cross-boundary growth pressures and town centre transformation.
Greater emphasis should be placed on surface water flooding and drainage.
Development should be proportionate to the size, character and identity of existing settlements.
The Local Plan should include a clear requirement that infrastructure delivery is monitored and reviewed.
Strengthen by including water security and long-term resilience, water security and long-term resilience, digital infrastructure and future connectivity, climate adaptation alongside climate mitigation, future-proof employment in advanced technology sectors, circular economy and sustainable construction, and nature recovery at landscape scale rather than solely site-by-site biodiversity improvements.
Consultation bodies and other stakeholders responses
Community Campaigner – traditional architecture design codes should be a central component especially concerning new construction. Full protection should be given to non-designated heritage assets and unclassified historic buildings.
Community Campaigner; Historic England; Worcestershire County Council – seek greater emphasis on conserving, enhancing and celebrating the historic environment, heritage assets and landscape character, including protection of non-designated heritage assets and traditionally designed development that supports placemaking and growth.
Canal & River Trust – many of the identified priorities are similar to those of the Canal & River Trust including transport and accessibility infrastructure; new development delivers meaningful local benefits; supporting renewable energy; design, heritage and place quality; and green infrastructure, health and wellbeing.
Wyre Forest District Council – pleased to see inclusion of walking and cycling but also recommend that transport and accessibility infrastructure includes 'wheeling'.
Sport England and Bromsgrove Cricket Hockey & Tennis Club – recommend strengthening the priorities by explicitly recognising the role of sport, recreation and leisure infrastructure in supporting sustainable growth, healthier communities and wellbeing. Such infrastructure should be considered as a specific strategic priority.
Worcestershire Wildlife Trust – rigorous consideration of issues set out in point 6 Environment, Climate and Landscape is essential to delivering a fit for purpose local plan. The Local Plan requires alignment with priorities in the Local Nature Recovery Strategy. Need to address the need for better water management in new developments e.g. limiting water use.

Churchill and Blakedown Parish Council – important to develop a holistic approach to development and co-ordination with neighbouring local authorities to provide a unified approach across the larger area.
Alvechurch Parish Council – importance of identifying the type and number of new homes required in each part of the District, ensuring new housing meets local needs, including starter homes and accommodation for older residents such as bungalows and independent sheltered living, without detrimentally impacting local character and community spirit.
Alvechurch Parish Council – any new housing should be tailored to starter homes, and the balance should be designed for use by elderly residents, such as bungalows and independent sheltered living.
Stratford-on-Avon District Council – support meeting Bromsgrove’s housing needs in full and seek clarity that the housing requirement will meet or exceed local housing need, avoiding unmet need being redistributed to neighbouring authorities. They also highlight the importance of recognising Bromsgrove’s relationship with Birmingham, responding to unmet needs arising across the GBBCHMA and wider West Midlands, and considering the role of emerging Strategic Development Strategies.
National Highways – improving and expanding active and sustainable transport links will be key to delivering sustainable development, alongside identifying and mitigating cumulative transport impacts.
West Midlands Housing Association Planning Consortium – consider that housing growth, affordable housing, infrastructure and transport are key priorities. The Local Plan should allocate sufficient land to meet housing needs, support delivery of affordable housing, including opportunities for 100% affordable housing schemes where there is a clear local need, and ensure infrastructure requirements do not undermine affordable housing delivery.
National Trust – support focus on community infrastructure, sustainable travel, green infrastructure, health and wellbeing. Consider the emerging Regional Park could play an important role in improving access to nature, supporting health and wellbeing, and enhancing green infrastructure across the district.
NHS Herefordshire and Worcestershire Integrated Care Board – support the inclusion of healthcare provision as a key priority and consider the Local Plan should recognise both the role of healthy place-making and the need to ensure sufficient primary and community healthcare capacity to meet existing and future demand arising from growth. Also highlight the importance of healthcare infrastructure planning for an ageing population.
Rowney Green Association (RGA) – position of smaller settlements in existing parishes with likely major new housing will need to be considered for improved access (roads and public transport) to the district centres and other shops and services.
Dudley Metropolitan Borough Council; Walsall Council – Bromsgrove should consider not only meeting its own housing and employment land needs but also contribute towards unmet housing and employment needs arising from neighbouring authorities across the Greater Birmingham and Black Country Housing Market Area, particularly where authorities are constrained by Green Belt designations or limited development opportunities.
On behalf of developers and landowners responses
Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd, Bloor Homes Western; Savills obo JT Cocks Settlement Trust; Lichfields obo UKLD (Bromsgrove) Ltd and St Philips Land Ltd; Delta Planning obo Bloor Homes Western & Maximus; Cerda Planning obo Riva Land (Wythall) Ltd and Ashberry Strategic Land (Bellway Homes Ltd); Define Planning & Design Ltd obo Ashberry Strategic Land; Tetra Tech obo Miller Homes; Deloitte obo Church Commissioners for England; Savills obo Bellway

Strategic Land and Miller Homes Limited; Bellway Homes Limited / Woosington One Limited and Persimmon Homes; IM Land; CBRE obo Bournville Village Trust; Boyer obo Cala Homes (Chiltern); Carter Jonas obo Persimmon Homes South Midlands; Nigel Gough Associates Ltd obo the Suddock Family and Retained Educational Charity; Nexus Planning obo Lone Star Land; Star Planning obo Richborough; Pegasus Group obo Catesby Estates; Evolve Planning obo Seven Homes; Lichfields obo Landra Developments Ltd and CDF100 Ltd; Turley obo BDW Trading (Redrow) – support meeting or exceeding housing requirements, maintaining a deliverable housing land supply, addressing housing delivery challenges and previous under-supply, providing sufficient affordable housing and contributing towards unmet housing needs arising from neighbouring authorities and the wider Housing Market Area.
• Pegasus Group obo Catesby Estates – only 40 affordable homes are delivered per year, on average, which is less than half of the identified annual need (92 units per year). This further underlines a need for the Council to plan for more housing than the minimum required by the Standard Method.
• Pegasus Group obo Catesby Estates – a detailed Green Belt Assessment must underpin the Plan, identifying grey belt sites that could be sequentially preferable for release as a result of exceptional circumstances to alter Green Belt boundaries.
• Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd, Bloor Homes Western; Bidwells obo Generator – support infrastructure delivery alongside development and highlight the importance of ensuring infrastructure provision is viable and deliverable.
• Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Bloor Homes Western; Indurent Strategic Land Ltd; Delta Planning obo Maximus; Planning Prospects – employment land and employment growth should be supported through an up-to-date evidence base that addresses local, strategic and cross-boundary needs, including industrial and logistics requirements. Employment growth should be aligned with market demand, capitalise on Bromsgrove’s strategic location, support economic productivity, inward investment and reduced out-commuting, and be appropriately balanced with environmental protection, infrastructure delivery and the provision of new housing.
• Harris Lamb obo Barberry Bromsgrove Limited, Bloor Homes Western – encourage the Council to plan for a longer period than 10 years from the date of adoption.
• Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd and Bloor Homes Western; Carter Jonas – support prioritising development in accessible locations with strong public transport links and sustainable transport options, including bus and rail networks, alongside active travel measures such as walking and cycling to help reduce congestion and support sustainable travel.
• Harris Lamb obo Pierpont Rose Holdings Ltd – the housing growth objective lacks commentary on settlement hierarchy and whether Bromsgrove Town will continue as the main settlement and focus for growth.
• Harris Lamb obo Bloor Homes Western – the list of challenges does not reference the fact that 90% of the land in the district is Green Belt, and there is limited scope to meet the district’s housing need on brownfield and urban sites.
• Bidwells obo Generator – sites with more than one landholding risks piecemeal development and a lack of joined up development e.g. access issues and delivery of shared infrastructure.
• Midland Land Limited – consider the District faces a challenge in meeting the housing and care needs of an ageing population. Particular emphasis should be placed on addressing under-occupation of family housing, providing

specialist older persons accommodation and delivering extra care housing to support local housing needs.
• CBRE obo Bournville Village Trust – consider development viability is a key challenge, and that planning obligations, affordable housing requirements and infrastructure contributions should be balanced to ensure development remains deliverable.
• Pegasus Group obo Catesby Estates – the overview from the 2025 DDS consultation is useful, but alone cannot shape the content of the Plan; that must be led by the requirements of the NPPF and a robust evidence base.
• Stantec Planning obo IM Land – consider a key priority should be delivery of strategic growth locations and urban extensions capable of delivering housing, employment opportunities, infrastructure and sustainable communities.

BDC's response:

- 3.2.2 Identifying the District's key priorities and challenges is an important early stage in preparing the Bromsgrove District Local Plan, helping ensure the Local Plan focuses on the matters that should be addressed, as appropriate. As mentioned in the scoping document, the priorities and challenges identified stemmed from previous consultations on the Local Plan, including last summer's Draft Development Strategy consultation.
- 3.2.3 Almost two-thirds of respondents agreed with the presented priorities and challenges. A number of respondents highlighted priorities that were already identified in the scoping document. There were a wide range of priorities identified by different groups, including, infrastructure provision, environmental protection, housing and employment growth and meeting the District's needs plus any unmet needs from neighbouring authorities.
- 3.2.4 It is noted and understood that from the responses received there are some priorities that compete against each other, particularly across the respondent groups. The Council will consider the new and suggested amendments and balance these, as appropriate, during the preparation of the Local Plan. Ultimately, the priorities will shape the vision for the Local Plan; the aims and objectives; the spatial strategy; allocated sites; and local policies. These matters will be the focus of future consultations.

3.3 Vision and objectives – Questions 2a, 2b, 3a and 3b

- 3.3.1 The vision and objectives section of the scoping document (section 4) explored what a local plan vision is; feedback on the comments received from the DDS consultation relating to the vision; and suggested potential aims and objectives for feedback covering infrastructure delivery; brownfield and town centre living; protection and enhancement of biodiversity, landscape and green/blue infrastructure; safeguarding settlement identity; sustainable transport options; affordable and balanced housing mix; town centre and local centres; and healthy, safe, inclusive places with supporting services and facilities. The tables below provide a summary of matters raised and underneath BDC's response to questions 2a, 2b, 3a and 3b.

Question 2a: Do you agree that the Local Plan should contain a distinct, Local Plan-specific vision rather than utilising the Council Plan vision? Yes / No / Unsure

Responses: 181

- Yes: 89%
- No: 3%
- Unsure: 8%

Question 2b: We would be interested to hear additional themes that you think the vision should contain.

Responses: 131

Summary of matters raised

Public responses

- Greater emphasis should be placed on protecting the Green Belt, countryside, agricultural land, biodiversity, wildlife habitats, landscape character and the distinct identity of Bromsgrove's towns and villages, including preventing urban sprawl and settlement coalescence.
- Development should be infrastructure-led, with roads, schools, healthcare facilities, drainage, utilities, parking and public transport improvements delivered before or alongside growth. Several respondents considered that growth should remain proportionate to the capacity of existing infrastructure and services.
- Brownfield land, vacant buildings and town centre regeneration opportunities should be prioritised before the release of Green Belt or other greenfield land.
- The vision should contain stronger commitments relating to climate change mitigation and adaptation, including low-carbon development, renewable energy, sustainable construction, water efficiency, flood resilience, sustainable drainage and the protection and enhancement of ecological networks.
- Greater emphasis should be placed on protecting and enhancing open spaces, leisure facilities, recreation opportunities, sports provision and community assets which support physical health, mental wellbeing and community cohesion.
- Support for vibrant town and village centres, local businesses, agriculture and rural enterprises, employment opportunities and sustainable economic growth, alongside greater emphasis on active travel, walking, cycling and reducing traffic congestion.
- The vision should contain clearer commitments, measurable outcomes and greater accountability, with communities having a stronger role in shaping and monitoring future development.
- Reflect the implications of Local Government Reorganisations, wider strategic planning matters, cross-boundary working and coordination with neighbouring authorities, including the role of regional transport infrastructure.
- Provide a balanced, genuinely affordable range of homes.

Consultation bodies and other stakeholders responses

- Sport England – supports the preparation of a distinct Local Plan vision and considers that the vision should set out how growth, infrastructure, health, environmental quality and sustainable communities will be delivered through planning policies and investment decisions.
- Sport England – recommends the vision explicitly references active and healthy communities, sport, recreation and physical activity opportunities,

healthy placemaking, active travel, connected neighbourhoods, access to high-quality sports facilities and open spaces, and reducing health inequalities through planning and development.
• Sport England – suggests the vision could include wording such as “Bromsgrove will be an active, healthy and inclusive district where residents of all ages and abilities have access to high-quality sport, recreation, leisure, open space and active travel opportunities that support physical and mental wellbeing.”
• Community Campaigner – support for traditional architecture and placemaking principles, including the use of traditional materials, enhanced landscaping and tree planting, greater protection and restoration of heritage assets, and heritage-led regeneration to reinforce Bromsgrove’s character while supporting housing delivery, environmental quality, biodiversity and economic growth.
• Wyre Forest District Council – recommend a standalone theme relating to climate covering adaptation and resilience.
• Natural England; National Trust – support a stronger focus on climate change adaptation and resilience, nature recovery, biodiversity enhancement, green and blue infrastructure, ecosystem services and access to green space, recognising the benefits for environmental sustainability, public health and wellbeing, and wider landscape connectivity.
• West Midlands Housing Association Planning Consortium – the aims and objectives should include a clear commitment to meeting the District’s housing needs and place greater emphasis on maximising affordable housing delivery.
• NHS Herefordshire and Worcestershire Integrated Care Board – support a stronger emphasis on primary and community healthcare capacity within the vision, alongside schools, community facilities and wider infrastructure, recognising the implications of an ageing population and increasing health needs.
• Worcestershire County Council – consider the vision should place greater emphasis on healthy communities, age-friendly neighbourhoods, reducing health inequalities, independent living and accessible environment.
• Historic England – consider the vision should better recognise the social, economic and environmental benefits of heritage and the contribution of the historic environment to the future development of the District.
• Rowney Green association – agree with this good and ambitious content for the plan’s aims and objectives. Progress will need to be monitored for each against specified time scales with regular reporting of results.
On behalf of developers and landowners responses
• Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, and Pierpont Rose Holdings Ltd; Turley obo BDW Trading Ltd (Redrow); PKR Planning Ltd; Lichfields obo UKLD (Bromsgrove) Ltd, St Philips Land Ltd, Landra Developments Ltd; Delta Planning obo Bloor Homes Western, Maximus; Cerda Planning obo Riva Land (Wythall) Ltd; Define Planning & Design Ltd obo Ashberry Strategic Land, Bloor Homes Western; Tetra Tech obo Miller Homes; Deloitte obo Church Commissioners for England; Savills obo Bellway Strategic Land; Savills obo Miller Homes Limited; Bellway Homes Limited / Woolsington One Limited and Persimmon Homes; Evolve Planning obo Seven Homes; IM Land; Cerda Planning obo Ashberry Strategic Land part of Bellway Homes Ltd; Boyer obo Cala Homes (Chiltern); Carter Jonas obo Persimmon Homes South Midlands; Nexus Planning obo Lone Star Land; Star Planning obo Richborough – support the preparation of a distinct Local Plan vision and considered that it should recognise Bromsgrove’s role in meeting both its own housing needs and unmet housing needs arising across the wider Housing Market Area. Respondents considered that sustainable growth, housing delivery and a clear strategy for meeting development needs should be key components of the

vision. Some also support the inclusion of measurable outcomes to monitor delivery of the vision.
Harris Lamb obo Terra Strategic, Barratt Redrow, the Church Commissioners for England, Bloor Homes and Birmingham Property Group Holdings ('The Joint Consortium'); Chave Planning obo Nurton Developments (Catshill) Ltd; Savills obo JT Cocks Settlement Trust; Lichfields obo Landra Developments Ltd, CDF100 Ltd – support a Local Plan vision aligned with national planning policy that addresses cross-boundary matters, including unmet housing and employment needs arising from neighbouring authorities and the Greater Birmingham and Black Country Housing Market Area, directs growth to sustainable locations, supports infrastructure delivery and economic growth, and recognises Bromsgrove's strategic role within wider sub-regional planning initiatives.
Simply Planning – the vision should contain housing need & supply; promoting sustainable development including development within the Green Belt; and infrastructure provision.
Bidwells obo Generator; Pegasus Group obo Catesby Estates – the vision should acknowledge that to meet the District's housing needs it will require Green Belt release.
Bidwells obo Generator – suggested measurable outcomes: net housing completions against the requirement; affordable housing completions against identified need, disaggregated by tenure; the proportion of new homes within a defined walking or cycling catchment of a railway station or a high frequency bus service; and delivery of each item of strategic infrastructure against its trigger point.
Indurent Strategic Land Ltd – consider that the vision should place greater emphasis on economic growth, inward investment, industrial and logistics development, high-quality employment opportunities and supporting a modern economy.
Turley obo BDW Trading (Redrow) – the purpose of a vision within a Local Plan, whilst aligned, differs significantly from that of a Council Plan.
Midland Land Limited – consider the vision should include provision for an ageing population, specialist older persons accommodation, extra care housing and the release of under-occupied family housing through downsizing and rightsizing opportunities.
Pegasus Group obo Catesby Estates – the Council Plan vision does not cover the whole Local Plan period and is ambiguous and does not include a framework for meeting housing needs and addressing other economic, social and environmental priorities.
Pegasus Group obo Catesby Estates – suggest measurable outcomes that include provision of development in sustainable locations; meeting housing needs of the district and unmet needs from neighbouring areas; deliver a variety of homes for different groups; deliver the employment land requirements in full; deliver accessible green and open space and sports facilities; contribute to net zero; and infrastructure delivery.

BDC's response:

- 3.3.2 The Local Plan vision will describe what Bromsgrove District should be like at the end of the Local Plan period, providing the direction for how the District should grow and change. It responds to the priorities and challenges and provides the direction for the Local Plan's aims and objectives; spatial strategy; site allocations; and planning policies.

- 3.3.3 The overwhelming majority of respondents support the development of a distinct, Local Plan-specific vision rather than utilising the current Council Plan vision. Respondents provided a wide array of themes the vision should contain, with some similarities with the priorities and challenges. Common themes include Green Belt protection, timely infrastructure delivery, climate adaptation, and sustainable development to meet the District's housing needs and the unmet needs of neighbouring authorities. As with the priorities and challenges, there are some competing vision themes, particularly across respondent groups, that the Council will need to balance when preparing the vision. Using the feedback received to date, a proposed vision will be consulted on at the next local plan content and evidence consultation.

Question 3a: Do you agree with the proposed aims and objectives? Yes / No / Unsure
Responses: 176
• Yes: 53% • No: 26% • Unsure: 21%

Question 3b: Are there any aims and objectives that you would change, add or delete? Please explain your answer.
Responses: 127
<u>Summary of matters raised</u>
Public responses
• Protect the Green Belt, Countryside, wildlife habitats, mature trees and landscape character. • Resist development which would undermine settlement identity, lead to urban sprawl or result in the coalescence of communities. • Reflect the implications of Local Government Reorganisation and wider strategic planning matters within the objectives. • Include clearer commitments, measurable outcomes, implementation mechanisms and timescales, with greater community involvement in planning decisions. • Improve road safety, pedestrian safety, public transport and traffic management, whilst ensuring development is located in sustainable locations. • Prioritise brownfield land, vacant buildings, the re-use of redundant commercial buildings and town centre regeneration before releasing Green Belt or other greenfield land for development. • Ensure infrastructure, including roads, schools, healthcare facilities, drainage, utilities, parking and public transport, is delivered before or alongside development, with sufficient capacity demonstrated in advance. • Assess the cumulative impacts of development and ensure the scale of growth remains proportional to the size, character and infrastructure capacity of individual settlements, whilst protecting settlement identity and community wellbeing. • Protect and enhance leisure, recreation and community facilities, including sports facilities, open spaces, playgrounds and community assets, and ensure any replacement provision is of equivalent or better quality and quantity.

• Support high-quality design, placemaking, heritage conservation and the protection of historic buildings and local character.
• Strengthen support for local businesses, employment opportunities, digital infrastructure, town centre vitality, food production and affordable housing in rural communities.
• Provide a balanced housing mix that meets local needs, including home for the first-time buyers, families and older people.
• The text under “Deliver healthy, safe, inclusive places with adequate services and facilities” should be amended to read: “Secure sufficient school places, healthcare capacity and community facilities, and protect sports and leisure assets to support physical and mental wellbeing. Where a sports and leisure asset is to be replaced, the replacement must be of an equal or better quantity and quality” to accord with national policy.
Consultation bodies and other stakeholders responses
• Wyre Forest District Council – suggest additional objectives relating to climate change, heritage assets, the Worcestershire Local Nature Recovery Strategy, active travel and cross-boundary working.
• Sport England – recommend a specific objective relating to active communities through the protection, enhancement and delivery of sport, recreation and physical activity infrastructure.
• Sport England – suggest strengthening infrastructure, healthy communities and sustainable transport objectives through greater recognition of sport and recreation infrastructure, improved walking, wheeling and cycling networks, and reducing health inequalities.
• Sport England – suggest measurable outcomes relating to open space, playing fields, sports facilities, active travel, participation in physical activity and the delivery of sports infrastructure alongside growth.
• Community Campaigner – support the inclusion of traditional architecture design codes, stronger placemaking principles, enhanced landscaping and tree planting, and greater protection and restoration of historic buildings and heritage assets.
• Worcestershire Wildlife Trust – support the biodiversity objective but recommended specific reference to the Worcestershire Local Nature Recovery Strategy.
• Natural England – should include the natural environment and be based on local characteristics and circumstances and include locally specific goals for nature recovery and enhancement, supported by policies and proposals.
• National Trust – consider that Green Belt objectives should have greater regard to public access, recreation, nature recovery and the beneficial use requirements of the NPPF. The Regional Park is identified as a potential mechanism to help deliver these outcomes alongside improved green infrastructure and biodiversity enhancements.
• NHS Herefordshire and Worcestershire Integrated Care Board – recommend measurable outcomes relating to healthcare infrastructure and capacity, to ensure the relationship between growth and healthcare provision can be monitored throughout the plan period.
• Dudley Metropolitan Borough Council – the proposed aims are inherently inward looking and do not consider the role of Bromsgrove within a wider economic geography, and how the Plan should respond to cross boundary issues such as infrastructure and accommodating unmet housing and employment land needs, in the determination of the plan’s housing requirement and spatial strategy. In addition to the aims and objectives, the spatial strategy should reflect the functional linkages with the West Midlands conurbation.
• Dudley Metropolitan Borough Council – request to be kept informed and engaged in the preparation of the IDP and cross-boundary issues.

Dudley Metropolitan Borough Council – request that any proposed allocations in close proximity to Dudley borough consider the potential impacts on the landscape, historic environments and biodiversity assets.
Dudley Metropolitan Borough Council – need to consider the requirements of Gypsy and Traveller communities and Travelling Showpeople. Emerging evidence indicates that accommodation shortfalls are arising across parts of the conurbation and in neighbouring authorities, including South Staffordshire.
Dudley Metropolitan Borough Council – advocates identifying employment land requirements, ensuring that sufficient land is allocated not only to meet Bromsgrove’s own economic development needs but also consider the potential to support unmet employment land requirements arising from neighbouring Functional Economic Market Areas (FEMAs).
Historic England – consider the aims and objectives should explicitly recognise the contribution of the historic environment and heritage assets to delivering the Local Plan’s priorities, aims and objectives.
Environment Agency – infrastructure and utilities, especially water availability and foul drainage should be brought forward in advance of development without causing deterioration of any watercourse. Recommend a water cycle study.
Environment Agency – regarding brownfield development, ensure a potentially contaminated site is deliverable and allocation numbers can be achieved.
Environment Agency – greener and more environmentally resilient, including green corridors could refer to the LNRS as an important tool in understanding areas of opportunity for biodiversity and ecological enhancements.
Environment Agency – emphasise the importance of the water environment (ponds, rivers, streams, wetlands) as part of the nature-based strategy and to further highlight the benefits from integrating blue and green infrastructure (urban cooling, carbon sequestration, natural flood management, nature recovery) even at a small scale (e.g. green walls & roofs, SuDS).
Environment Agency – delivering high quality, sustainable designs could seek to include water efficiency / water recycling measures and energy efficiency. We expect the water efficiency standard required in local plan policy for all new residential developments to be designed to utilise no more than 100 litres per person per day, or future successor standards where more stringent.
Environment Agency – should consider increasing requirements for BNG beyond national minimum. Higher BNG targets encourages more ambitious and effective habitat creation, restoration, and connectivity within developments. This would help offset the cumulative impact of growth and contribute to long-term ecological resilience and nature recovery.
Environment Agency – applying the flood risk sequential test early in the selection of growth strategies and sites, will provide the best chance of district wide or catchment climate change resilience and means safer communities, less reliance on current flood risk and drainage infrastructure.
Environment Agency – identify climate change as a priority and to align policies with national net zero targets and mitigation policies. Welcome consideration of renewable energy provision.
Rowney Green Association – we agree with this good and ambitious content for the plan’s aims and objectives. Progress will need to be monitored for each against specified timescales with regular reporting of results.
On behalf of developers and landowners responses
Chave Planning obo Nurton Developments (Catshill) Ltd – question whether masterplanning larger sites is the most appropriate mechanism for safeguarding settlement identity as it seems more related to ensuring well-connected and walkable neighbourhoods.

Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd, Terra Strategic, Bloor Homes (Western) and the Joint Consortium; Savills obo JT Cocks Settlement Trust; Lichfields obo UKLD (Bromsgrove) Ltd, St Philips Land Ltd; Delta Planning obo Bloor Homes Western and Maximus; Define Planning & Design Ltd obo Ashberry Strategic Land and Bloor Homes Western; Deloitte obo Church Commissioners for England; Savills obo Bellway Strategic Land; Lichfields obo Landra Developments Ltd; Savills obo Miller Homes Limited; Bellway Homes Limited / Woosington One Limited and Persimmon Homes; IM Land, Evolve Planning obo Seven Homes; CBRE obo Bournville Village Trust (BVT); Boyer obo Cala Homes (Chiltern); Carter Jonas obo Persimmon Homes South Midlands – object to the objective of reducing Green Belt release. Consider that the objective should instead support a review of Green Belt and Grey Belt land to ensure development needs can be met in accordance with national planning policy.
Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd and Bloor Homes (Western); Evolve Planning obo Seven Homes – support prioritising brownfield and town centre development but consider that the objectives should also support housing delivery in sustainable locations, close to services, facilities and public transport.
Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd and Bloor Homes (Western) – consider that biodiversity objectives should reflect the statutory requirement for a minimum 10% Biodiversity Net Gain and that any higher requirements should be justified and deliverable.
Harris Lamb obo Taylor Wimpey and Pierpont Rose Holdings Ltd – support stronger references to sustainable transport, active travel and development located close to public transport infrastructure.
Carter Jonas; Twenty5 Planning Ltd obo Lagan Homes; and Simply Planning Ltd – support directing development towards sustainable settlements and locations with good public transport accessibility.
Blenheim Strategic Partners – consider that infrastructure delivery should be realistic and deliverable and that infrastructure should not act as a constraint on development.
PKR Planning Ltd – consider that references to "potential" aims and objectives should be removed to provide greater certainty.
Bidwells obo Generator – the housing growth objective should refer to housing need rather than requirement. The requirement is what the plan will set and meeting local housing need in full is calculated using the standard method.
Bidwells obo Generator – the brownfield objective should be retilled to “Make the best use of brownfield and town centre capacity, and release Green Belt land where required to meet identified needs in full.”. Note of realism about town centre capacity that higher density town centre schemes are currently very difficult to deliver.
Bidwells obo Generator – strengthen the masterplanning objective to make clear that masterplanning of strategic allocations is comprehensive across the whole allocation irrespective of land ownership. Additionally, require that primary access and movement infrastructure is delivered to and through all development parcels within an allocation.
RCA Regeneration Ltd obo St Phillips, Ms P Wesner – consider that the Plan should respond positively to housing affordability pressures, direct growth towards sustainable locations with existing services and infrastructure, and ensure that climate change and net zero policies remain deliverable and viability-tested.
Lichfields obo Landra Developments Ltd – consider that the Plan should contain an objective that makes explicit reference to working collaboratively

with neighbouring authorities in the West Midlands to facilitate cross-boundary growth.
• Lichfields obo CDF100 Ltd – recommends that the proposed objective to “prioritise brownfield and town centre capacity, reducing Green Belt release” be deleted. This objective conflicts with the Council’s own acknowledgment that “brownfield capacity in Bromsgrove district is very limited and significant Green Belt release will still be required” in the following sentence.
• Turley obo BDW (Redrow) – raises concern with the aim to “prioritise and town-centre capacity, reducing Green Belt release.” Whilst brownfield-first is an important principle, it is already acknowledged within the scoping consultation that brownfield capacity in Bromsgrove district is very limited and significant Green Belt release will still be required.
• Delta Planning obo Maximus – stronger emphasis on economic growth and employment land provision alongside housing growth to meet the District’s needs. The scoping document includes the aim to ‘support a thriving town centre and resilient local economy’, but this objective seems to be strongly focused on the regeneration of Bromsgrove town centre.
• Midland Land Limited – support a specific objective relating to extra care and housing-with-care provision, including quantified delivery targets and monitoring mechanisms. Consider that facilitating downsizing and reducing under-occupation of family homes should be recognised as contributing to housing supply.

BDC’s response:

- 3.3.4 The Government’s Local Plan guidance outlines that the vision statement should include and be split into clear and focussed paragraphs based on specific aims and objectives. The aims and objectives should be ambitious but achievable, recognising the scope of what the Local Plan’s planning policies can shape and deliver. Up to 10 measurable outcomes will be established to assess progress towards delivering the vision.
- 3.3.5 It is noted that just over half of respondents agree with the proposed aims and objectives. Respondents highlighted a wide range of aims and objectives, some of which are already covered by the identified proposed aims and objectives in the document, for example, providing the infrastructure required to support future growth. Respondents raised some new objectives and amendments which will be considered as we prepare the aims and objectives to be consulted on at the next local plan content and evidence consultation.

3.4 Local Plan topic-based content – Questions 4a, 4b, 5a and 5b

- 3.4.1 The local plan topic-based content section of the scoping document (section 5) explored current and emerging national policy in the NPPF (at the time of the publication of the scoping consultation, the August 2026 version of the NPPF was not published). The section sought feedback on the indicative content of the new-style Bromsgrove District Local Plan and the potential topic-based policies the Local Plan could contain. The tables below provide a summary of matters raised and underneath BDC’s response to questions 4a, 4b, 5a and 5b.

Question 4a: Do you agree with the possible content of the Bromsgrove District Local Plan? Yes / No / Unsure

Responses: 177

- Yes: 61%
- No: 15%
- Unsure: 24%

Question 4b: Is there anything you would change, add or delete?

Responses: 112

Summary of matters raised

Public responses

- Ensure new housing is built in preparation for a globally warmed climate. Utilise whatever technologies are necessary to make houses habitable including heat pumps, air con etc.
- Prioritise brownfield land over Green Belt. The plans content must include a legally binding infrastructure delivery plan that completely excludes rural villages from large-scale allocations (500+ homes).
- The actual consultation does not explain nor provide a list of possible content for the Local Plan.
- Should include settlement-specific chapters (e.g. Barnt Green), site-specific evidence summaries, and a dedicated Green Belt Strategy. There should also be transport modelling.
- The Local Plan content should be strengthened by adding protection of established leisure and recreational assets, recognising their importance for public health, active lifestyles, youth engagement, and community cohesion.
- Full transparency of evidence, including developer submissions, viability assessments, environmental studies, and transport modelling.
- Consideration of the cumulative impacts of nearby developments in neighbouring authorities.
- Impossible to fully agree until the final National Planning Policy Framework is published and the detailed Local Plan policies are available.
- The Bromsgrove Local Plan is defunct due to Local Government Reorganisation.
- Any new approved building is not started until those building sites already in progress are finished. Limiting the disruptions to infrastructure.
- A dedicated Digital Infrastructure policy should promote full-fibre broadband, reliable mobile connectivity and smart infrastructure to support modern businesses, education, healthcare and home working across both urban and rural communities.
- Environmental policies should be expanded to include Nature Recovery, promoting connected wildlife corridors, woodland creation, river restoration, green infrastructure and biodiversity enhancement beyond the statutory minimum requirements. The Plan should also include a water resources and water security policy.
- Housing policies should place greater emphasis on high-quality, energy-efficient and adaptable homes, including accessible housing, Lifetime Homes, specialist accommodation for older people, homes suitable for home working and high standards of design and sustainability.
- Each topic-based policy should be supported by clear monitoring indicators and measurable outcomes to enable progress to be assessed throughout the Plan period.

• Economic policies should recognise the changing nature of employment. The Local Plan should include policies promoting the Circular Economy, encouraging the reuse of buildings and materials, sustainable construction, waste reduction and resource efficiency.
• Policies to protect the District's best agricultural land and supporting local food production.
• This impacts heavily on the Birmingham area as this sits on the border.
• The number of new homes is unclear. The earlier figure was too high and disproportionate.
• Need to ensure that green transport is realistic, feasible and accurate e.g. walking distances and safe cycle routes that have been reported are not accurate or realistic for people to use in their everyday lives.
• A firm control on the businesses on our High Street, improved checks to ensure all businesses are of a legal and bona fide type.
• There is no mention of what has now become known as a Grey Belt, this should be included and referred to in all of the Plans etc and formerly opposed.
• Conservation areas must be protected.
Consultation bodies and other stakeholders responses
• Community Campaigner – traditional architecture design codes should be a central component. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection.
• Sport England – the description of the spatial strategy should explicitly acknowledge the role of the Green Belt, and that land allocations and designations may include the release of suitable and sustainable Green Belt.
• Canal & River Trust – may have data which might be of use in the preparation of the local plan. This can be accessed at https://data-canalrivertrust.opendata.arcgis.com.
• Alvechurch Parish Council – greater emphasis on 'local' needs and requirements of each specific village or Parish, and not just a District wide approach. The vision and requirements of Bromsgrove town, or the greater populated Parishes of Hagley or Wythall, are very different to those of Alvechurch or smaller adjoining Parishes such as Barnt Green or Beoley.
• National Trust – consider that green infrastructure should be explicitly recognised within the Local Plan and support inclusion of the Regional Park as part of the wider green infrastructure network. Development should contribute towards accessible green spaces, recreation opportunities and the delivery of wider environmental benefits.
• NHS Herefordshire and Worcestershire Integrated Care Board – support inclusion of infrastructure provision within the Local Plan and consider healthcare infrastructure requirements should be explicitly identified within the Infrastructure Delivery Plan.
• Historic England – recommend locally specific content relating to the historic environment, heritage assets, local distinctiveness and place identity, and how these can positively influence future growth and development.
• Rowney Green Association – if paragraph 54 indicates a ranking of policies, the site allocation policies needs to move to the beginning. Site allocation is where the current controversy rests, and these policies (including inevitable Green Belt release/grey belt designation) affect many of the others very significantly.
• Environment Agency – the spatial strategy should reference flood risk, provision of infrastructure (water supply and foul drainage) and consideration of climate change.
On behalf of developers and landowners responses

• Turley obo BDW Trading Ltd (Redrow); Lichfields obo UKLD (Bromsgrove) Ltd; Delta Planning obo Bloor Homes Western, Maximus; Define Planning & Design Ltd obo Ashberry Strategic Land and Bloor Homes Western – recognised that the revised NPPF had not been published. It is prudent and critical that the content, including proposed policies, be reviewed to ensure that these accord with the requirements of the revised NPPF.
• Harris Lamb obo Taylor Wimpy, Barberry Bromsgrove Ltd, Terra Strategic, Bloor Homes Western, The Joint Consortium – largely agree with the content of the Local Plan, subject to further review in relation to all of the plan-making policies in the recently published 2026 Framework. We do not propose any changes as long as any local topic-based policies do not seek to duplicate or overlap with national decision-making policies. Local policies must be necessary and justified.
• Bidwells obo Generator – include a settlement hierarchy that defines the role and function of each settlement.
• Indurent Strategic Land Ltd – consider that the Local Plan should identify sufficient employment land to meet future industrial and logistics needs and include a clear spatial strategy for employment growth.
• Tetra Tech obo Miller Homes – consider the Local Plan should include locally specific content relating to settlement hierarchy, housing allocations, Green Belt boundary changes, site capacities, affordable housing requirements and monitoring and delivery mechanisms.
• Deloitte obo Church Commissioners for England – support inclusion of a clear spatial strategy, housing and employment allocations, infrastructure delivery mechanisms, affordable housing policies, Green Belt and Grey Belt policies, and monitoring and delivery frameworks.
• Savills obo Bellway Strategic Land, Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes; IM Land – consider the Local Plan should place greater emphasis on meeting housing and affordable housing needs in full and recognise long-term housing under-delivery across the District.
• Lichfields obo Landra Developments Ltd – agrees these will likely be the most relevant policy areas the Plan can address. The housing policies should establish the District's housing need figure and means to surpass it with a buffer.
• Lichfields obo CDF100 Ltd – advises these policies be prepared grounded in the latest evidence, making direct reference to the evidence base so as to clearly explain their rationale. Additionally, encourage the Council to ensure these policies reflect the incoming Spatial Development Strategy for the West Midlands Combined Authority.
• Evolve Planning obo Seven Homes – strongly supports the identification of housing delivery, the establishment of a spatial strategy including the level of homes to be provided and specific allocation as a key aspect of the local plan.
• Midland Land Limited – consider the Local Plan should include specific content relating to specialist older persons housing, extra care accommodation, housing-with care, site selection criteria for specialist housing campuses and associated monitoring arrangements.
• Delta Planning obo Maximus – the spatial strategy should be informed by a comprehensive review of the District's Green Belt to identify the most suitable and sustainable locations for economic growth.
• Boyer obo Cala Homes (Chiltern) – support inclusion of a clear spatial strategy, housing allocations, infrastructure delivery mechanisms and monitoring arrangements consistent with national policy requirements.
• Stantec Planning obo IM Land – support a spatial strategy focused on larger sustainable settlements and consider a range of site sizes should be allocated

to support delivery throughout the plan period and reduce reliance on a small number of strategic sites.
Star Planning obo Richborough – Green Belt is a planning policy tool rather than a physical constraint to growth. The absence of significant urban regeneration sites and brownfield sites inevitably means that Green Belt land will need to be released.

BDC's response:

- 3.4.2 Some respondents misunderstood this question, with some focusing on potential policy areas (which is the focus of questions 5a and 5b) rather than the structure and content of the Local Plan. There were however comments about specific elements of the Local Plan's content, such as the spatial strategy.
- 3.4.3 The publication of the August 2026 NPPF has provided greater certainty about the content requirements of local plans under the new plan-making system, as the NPPF was still in draft form when the scoping consultation was publicised. The consultation responses to date, together with the requirements of the August 2026 NPPF, will inform the content of the Local Plan and will be reflected in the next consultation on plan content and supporting evidence.

Question 5a: Do you agree with the topic-based policies that the Bromsgrove District Local Plan could contain? Yes / No / Unsure
Responses: 173
- Yes: 61% - No: 10% - Unsure: 29%

Question 5b: Is there anything you would change, add or delete?
Responses: 86
<u>Summary of matters raised</u>
Public responses
- Strengthen policies to strictly uphold the NPPF's 'exceptional circumstances' test, preventing the disproportionate expansion and urbanisation of historic village boundaries. - Mandate that developers install Sustainable Drainage Systems (SuDS) that guarantee a zero-net-increase in surface water runoff. - Provision of playgrounds, sports facilities and green space within walking distance of new housing developments. - Design is too generic and buzzword incorporation. The policy should contain the following: design code and standards; this should be a usable policy and design document. Additionally, design should also cover amenity. - All site allocations should be supported by independently verified evidence covering highways, healthcare, education, utilities, drainage, flood risk, biodiversity and environmental capacity.

Infrastructure commitments should be monitored annually and reported publicly so that communities can see whether promised improvements have been delivered.
The Local Plan should require cumulative impact assessments rather than considering sites in isolation. Existing residents experience the combined effect of development, not individual planning applications.
The Plan should contain stronger policies preventing disproportionate growth that fundamentally alters the character, identity and function of settlements.
Must include a transparent site selection methodology, a Green Belt exceptional circumstances test, and an infrastructure first requirement.
Should include a dedicated policy protecting leisure and recreational land, ensuring that such assets are safeguarded. If loss is necessary, ensuring that there are replacement facilities of equivalent or better quality, quantity, accessibility, and cost.
Topics must include physical and mental health and wellbeing for all ages and groups and maintaining a wide-ranging infrastructure for leisure and sporting facilities.
Education and community facilities are not currently included and should be given the scoping report identifies these are important issues across BDC area.
Consultation bodies and other stakeholders responses
Sport England – recommends the inclusion of specific policies addressing protection and enhancement of sports facilities, provision of sport and recreation infrastructure, and active design and healthy communities.
Worcestershire Wildlife Trust – recommend a specific mention of biodiversity. In the context of LNRS there will be a need for locally-specific policies as well as those set out in NDMPs.
Worcestershire Wildlife Trust – recommend a specific section on monitoring of plan outcomes and requirements for long term management of environmental assets where these fall outside requirements of the NPPF.
Swifts Local Network: Swifts & Planning Group – swift bricks should be included in developments in line with the August 2026 NPPF and NPPG. House martins are a significant species in Bromsgrove with good availability of vegetated and waterside areas for foraging.
Natural England – inclusion of strategic policies covering: Geodiversity and Biodiversity; Designated sites; Biodiversity Net Gain; Green and Blue Infrastructure; Local Nature Recovery Strategy; Water Quality and Resources and Flood Risk Management; Protecting Best and Most Versatile Land; Protected Landscapes; Connecting People with Nature; and Health and Wellbeing.
Natural England – should contain policies to mitigate and adapt to climate change impacts. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store.
Natural England – policies should address water use, promote sustainable drainage systems (SuDS), water sensitive design as part of a wider green infrastructure approach, and water efficiency/reuse measures.
Natural England – recommend policies reflect the 5 headline Green Infrastructure Standards (Green Infrastructure Strategy Standard; Accessible Greenspace Standards; Urban Nature Recovery Standard; Urban Greening Factor; and Urban Tree Canopy Cover) in Natural England's Green Infrastructure Framework Principles and Standards for England.
Natural England – embedding green infrastructure into walking and cycling routes can encourage the uptake of active travel, supporting increased physical activity, improved air quality and the reduction in vehicular traffic. Creating

green corridors assists with urban cooling and increases people's opportunities to connect with nature.
Natural England – note the importance that nature plays in supporting our health and wellbeing. Advise increasing access to urban green space; ensure availability and access to a variety of green and blue spaces (parks, playgrounds, woodlands, community gardens, allotments, water features, etc.); improve the quality of existing green and blue spaces; and include community gardens and food growing spaces.
West Midlands Housing Association Planning Consortium – welcome the proposed housing-related policies and consider they should place a strong emphasis on affordable housing delivery and meeting identified local housing needs.
Fisher German obo National Grid Electricity Transmission – do not propose any topic-based policies at this stage, however, it is recommend that in future iterations of the Local Plan, site specific policies identified to be encumbered by NGET assets or an appropriate overarching policy (such as one setting out approach to design of development) include wording which appropriately recognises and responds to the presence of NGET assets.
NHS Herefordshire and Worcestershire Integrated Care Board – recommend locally specific policies relating to healthcare infrastructure, including developer contributions towards healthcare capacity, Health Impact Assessments for major development, support for healthcare premises, and recognition of the healthcare implications of specialist and older persons' housing.
Historic England – recommend policies relating to the historic environment, heritage assets and their settings, including policies that help reinforce Bromsgrove's local character and identity.
Rowney Green Association – if paragraph 54 indicates a ranking of policies, the site allocation policies needs to move to the beginning. Site allocation is where the current controversy rests, and these policies (including inevitable Green Belt release/grey belt designation) affect many of the others very significantly.
On behalf of developers and landowners responses
Harris Lamb obo the Joint Consortium, Bloor Homes Western, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd, Asset Storage Limited, Aniston Limited; Lichfields obo UKLD (Bromsgrove) Ltd, St Philips Land Ltd; Delta Planning obo Bloor Homes Western & Maximus, Define Planning & Design Ltd obo Ashberry Strategic Land and Bloor Homes Western; Star Planning obo Richborough – largely agree that the topic-based policies are appropriate, subject to a review against the new NPPF (2026) so as to avoid duplication.
Harris Lamb obo Taylor Wimpy, Joint Consortium, Barberry Bromsgrove Limited, Terra Strategic – seek to clarify or amend any design-based policies. Wish to avoid a topic-based policy that do not mirror the national decision-making policies on design.
Harris Lamb obo Taylor Wimpey Strategic – an additional policy may be required if the Council decide to work with adjoining neighbours to assist with meeting unmet need arising from elsewhere within the HMA.
Turley obo BDW Trading (Redrow) – there is a need to ensure that the housing requirement is evidence-led. A balanced spatial strategy should be prepared, which provides for a range of site sizes and locations, including small, medium and strategic sites.
Savills obo JT Cocks Settlement Trust – consider the Local Plan should place greater emphasis on employment growth and include specific consideration of freight and logistics development in accordance with national planning policy.

• Bidwells obo Generator – suggest locally specific policies: comprehensive development of strategic allocations (agreed masterplan or design code covering the whole allocation prior to determination); infrastructure cost, apportionment and equalisation; Green Belt (define boundaries), grey belt (identification) and safeguarded land; and local centres in new communities.
• Indurent Strategic Land Ltd – policies should recognise the locational and operational requirements of industrial and logistics development, including strategic employment sites with good access to the Strategic Road Network.
• Tetra Tech obo Miller Homes; Deloitte obo Church Commissioners for England; CBRE obo Bournville Village Trust (BVT) – consider affordable housing requirements, housing needs of different groups and locally derived standards for open space and recreation should be informed by evidence and tested through viability. Policies should avoid unnecessary duplication of national policy.
• Deloitte obo Church Commissioners for England – support policies relating to affordable housing, delivery of homes for different groups, viability, health and recreation provision, and climate change, provided requirements remain evidence-led and deliverable.
• Savills obo Bellway Strategic Land, Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – support flexible, evidence-led housing policies and consider climate change, biodiversity net gain and design requirements should remain proportionate, justified and deliverable through viability testing.
• IM Land – support infrastructure-led growth but consider infrastructure requirements should be proportionate, viability-tested and capable of responding to individual site circumstances.
• Turley obo BDW Trading (Redrow) – need to ensure the housing requirement is evidence-led. A balanced spatial strategy should be prepared, which provides for a range of site sizes and locations, including small, medium and strategic sites. Sufficient housing is planned to support the delivery of affordable homes. The Plan should be informed by evidence on site availability, suitability and achievability. Consideration and approach to Green Belt release required and ensure that infrastructure is planned alongside growth.
• Midland Land Limited – support a dedicated policy relating to specialist housing for older people, including extra care and housing-with-care provision, together with consideration of affordable housing, viability and design requirements for these forms of development.
• Evolve Planning obo Seven Homes – supports the delivery of new homes, including the establishment of the housing requirement, identification of housing allocations and policies to provide specific guidance in respect of the mix of homes to be provided, including size, type and tenure.
• Boyer obo Cala Homes (Chiltern) – consider Green Belt policies should reflect the need for Green Belt and Grey Belt release to meet housing needs. Design and parking policies should remain flexible, proportionate and avoid unnecessary duplication of national policy.
• Carter Jonas obo Persimmon Homes South Midlands – consider topic-based policies should place greater emphasis on infrastructure delivery, renewable energy and nature recovery, whilst ensuring sufficient land is identified to meet housing requirements throughout the plan period.

BDC's response:

- 3.4.4 Over 60% of respondents agree with the topic-based policies that the Bromsgrove District Local Plan could contain.

- 3.4.5 Under the new plan-making system, local plans will take a different and more streamlined form than local plans prepared under the former plan-making system. They will focus on a more limited and targeted set of locally relevant policies, rather than seeking to include a broad range of planning policies historically covered by adopted local plans. This approach reflects changes to national policy.
- 3.4.6 The scoping document recognised that the draft NPPF published in December 2025 had not been finalised and that the scope and content of its proposed policies therefore remained subject to change. Now that the finalised version of the NPPF, published in August 2026, has been published the Council will continue to fully review the policies within the Framework. This will ensure the Local Plan is consistent with national policy, including not containing policies which duplicate, substantively restate or are inconsistent with the content of national decision-making policies, unless directed by other policies in the Framework, in accordance with policies PM6 and PM15. This will support the preparation of proportionate and justified policies that address local circumstances while complying with national policy.
- 3.4.7 Opportunities to provide comments on any locally specific policies and the content of the local plan will be available at the subsequent local plan content and evidence consultation stage, as well as during the proposed local plan consultation.

3.5 Local Plan evidence base – Questions 6a and 6b

- 3.5.1 The Local Plan evidence base section of the scoping document (section 6) explored the evidence base we think is required to support the production of the Local Plan. Feedback was sought on the proposed evidence base documents and any additional evidence required. The tables below provide a summary of matters raised and underneath BDC's response to questions 6a and 6b.

Question 6a: Do you agree with the scope of the proposed evidence base to support the Local Plan (table 2)? Yes / No / Unsure
Responses: 171
• Yes: 50% • No: 29% • Unsure: 21%

Question 6b: Is there any other evidence you feel we need to inform our Local Plan?
Responses: 108
<u>Summary of matters raised</u>
Public responses
• Priority should be given to updating the existing Green Belt study to be in line with the revised NPPF. This should include a Grey Belt assessment of Green Belt parcels that is sufficiently granular. Additionally, there were some requests for a Brownfield Capacity Study.

• Priority should be given to producing the Infrastructure Delivery Plan (IDP). IDP should be as explicit as possible on requirements District wide and per allocated site.
• Site Assessments should include measures of access to green spaces, sports facilities and playgrounds.
• Requests to publish evidence regarding the traffic, congestion and road safety impacts of sites. Assessments should be carried out on the cumulative impact of site allocations.
• Site allocations should include assessments of surface water drainage and sewerage capacity.
• Publish evidence provided by healthcare, education, emergency services and utilities providers. This should provide clarity on current capacity, what additional development is expected to require and how additional service provision could be accommodated.
• List of public and private entities consulted on the Local Plan.
• Include an assessment of local distinctiveness, important views and character of settlements.
• Evidence of cross boundary work with neighbouring authorities. To ensure the implications of developments adjacent to Bromsgrove District have been thoroughly considered.
• Require assessment of healthcare and education capacities and required contributions, transport assessments, flood risk assessments and other evidence required for planning applications, prior to site allocation.
• Ensure residents views from consultations are published as part of the evidence base.
• Consider the National Trust Regional Park Strategy.
• Clearly present the exceptional circumstances that require the development of Green Belt land to meet the Council's assessed housing need.
• Provide evidence on the capacity and coverage of broadband, mobile networks and highlight areas with poor access to these services.
• Update the Housing and Economic Development Needs Assessment (HEDNA).
• Ensure consistency of the evidence collected across all authorities that will comprise the North Worcestershire Council following Local Government Reorganisation.
• Provide evidence relating to job creation, green jobs and the impact of AI.
• Ensure that the impacts of climate change are properly accounted for in for all evidence base documents.
• Some comments raise concern around whether the timescales for producing the local plan and its updated evidence base are realistic.
• Provide documentation on the capacity of mental health service provision and implications on capacity and wellbeing from the scale of development.
• Consider publishing site assessments in full.
• Include evidence on the capacity and requirements for parking in local centres.
• Include a Natural Capital Assessment.
• Leisure & Recreation Needs Assessment, Playing Pitch Strategy and Built Facilities Assessment, Green Infrastructure and Biodiversity Study, and Health Impact Assessment.
Consultation bodies and other stakeholders responses
• Sport England: ○ supports the proposed evidence base but recommends that additional emphasis is given to the assessment of sport, recreation and physical activity needs.

○ Whilst the evidence base includes an updated Playing Pitch and Outdoor Sports Strategy, Sport England recommends the preparation or update of an Indoor and Built Facilities Assessment in line with Sport England's guidance. ○ Sport England provided more detailed suggestions on what should be included within other evidence base documents including the Playing Pitch and Outdoor Sports Evidence, Sports Facility Strategy and the Infrastructure Delivery Plan.
• Canal and River Trust – provided links to their datahub which can support the development of the Local Plan.
• Wyre Forest District Council – a Built Facilities Strategy could be included to support the Playing Pitch Strategy.
• Alvechurch Parish Council – study needs to be taken on the current availability of parking spaces, the effect of this on the sustainability of village centres, and the shortfall needed for village centres to remain sustainable and cater for the growth needed due to any new projected housing.
• Natural England – the strategy for allocating land for development should: avoid protected sites and apply the biodiversity mitigation hierarchy (former NPPF para 180a); give great weight to conserving and enhancing designated landscapes; and avoid the loss of best and most versatile agricultural land. Site selection evidence base should include: ○ Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. ○ Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ○ ecological surveys, green infrastructure and biodiversity opportunity mapping. ○ Must also be informed by the Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment.
• Stratford-on-Avon District Council – support the proposed evidence base and suggest that future evidence should consider wider strategic matters including unmet housing needs arising across the GBBCHMA, employment land requirements across the West Midlands, and Gypsy, Traveller and Travelling Showperson accommodation needs.
• National Highways – content that the proposed evidence base contains the documents relevant to its statutory responsibilities and notes the importance of the Strategic Transport Assessment and Infrastructure Delivery Plan.
• West Midlands Housing Association Planning Consortium – support preparation of an updated Housing and Economic Development Needs Assessment to ensure the Local Plan is informed by up-to-date evidence on housing and affordable housing needs.
• National Trust – consider evidence relating to the Regional Park, green infrastructure, open space provision and the wider environmental, access and wellbeing benefits of connected green networks.
• NHS Herefordshire and Worcestershire Integrated Care Board – support inclusion of healthcare infrastructure evidence within the Infrastructure Delivery Plan and Health Impact Assessment and request ongoing involvement in the preparation of these evidence base documents. Also support engagement with acute and community healthcare providers in preparing the evidence base.
• Dudley Metropolitan Borough Council – advise the West Midlands Economic Geography Report and regional/sub-regional studies are considered as part of the evidence base.
• Historic England – support preparation of Heritage Impact Assessments and recommend that site assessment work includes proportionate consideration of heritage assets and their settings. Also raise a concern regarding an aspect of the SEA Screening Statement and highlight the importance of assessing

impacts on the historic environment through the Sustainability Appraisal and Strategic Environmental Assessment processes.
Rowney Green Association – the evidence collection relating to green and grey belt assessments needs to be progressed urgently given housing developers' interests now in making their own identification of land for green belt release in the absence of both a valid Bromsgrove district plan and 5 years supply of available housing land.
Environment Agency – provides guidance on Strategic Flood Risk Assessment; Water Cycle Studies (water quality and water resource); and SEA.
Worcestershire County Council – recommend greater emphasis on healthy placemaking, ageing well, landscape character and the historic environment, including use of the terminology “conserve, enhance and celebrate” in accordance with national policy
On behalf of developers and landowners responses
Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Pierpont Rose Holdings Ltd, Terra Strategic, Bloor Homes (Western), Asset Storage Limited and Aniston Limited and the Joint Consortium; Twenty5 Planning Ltd obo Lagan Homes; Turley obo BDW Trading Ltd (Redrow); Define Planning & Design Ltd obo Ashberry Strategic Land and Bloor Homes Western – the proposed list of evidence-base documents is broadly supported and is considered proportionate and consistent with the requirement for relevant, focused, reliable and up-to-date evidence.
Harris Lamb obo Taylor Wimpey, Barberry Bromsgrove Limited, Terra Strategic, Bloor Homes (Western), Asset Storage Limited and Aniston Limited and the Joint Consortium – suggestions that the Council should explore opportunities to prepare evidence jointly with neighbouring authorities particularly those authorities that would form the proposed North Worcestershire Council following Local Government Reorganisation.
Turley obo BDW Trading Ltd (Redrow); Lichfields obo UKLD (Bromsgrove) Ltd, Landra Developments Ltd; Delta Planning obo Bloor Homes Western, Maximus; Pegasus Group obo Catesby Estates – requests to update the Housing and Economic Development Needs Assessment, Green Belt evidence and undertake a Grey Belt assessment to reflect current housing needs and changes to national planning policy.
Harris Lamb obo Pierpont Rose Holdings Ltd; Evolve Planning obo Seven Homes – the Housing and Economic Development Needs Assessment, or a separate supporting study, should assess the wider range of housing needs for different groups required by NPPF policy HO1.
Harris Lamb obo Taylor Wimpey, Pierpont Rose Holdings Ltd, Terra Strategic, Bloor Homes (Western) – evidence should consider the relationship and needs arising across the wider Housing Market Area, including unmet needs from neighbouring or nearby authorities. With reference to Redditch Borough and the GBBCHMA Housing Market Area.
Harris Lamb obo Pierpont Rose Holdings Ltd, Terra Strategic, Bloor Homes (Western) and the Joint Consortium – as the Local Plan is being prepared before the Spatial Development Strategy, the supporting evidence should take account of any relevant emerging strategic direction, particularly in establishing housing requirements and addressing housing and employment needs.
Twenty5 Planning Ltd obo Lagan Homes; Harris Lamb obo of Terra Strategic, the Joint Consortium; Bidwells obo Generator; Delta Planning obo Maximus; Pegasus Group obo Catesby Estates; Boyer obo Cala Homes (Chiltern) – the previous Green Belt Assessment and Green Belt Study should be updated to reflect significant changes in national planning policy. This such include a Grey

Belt assessment which does not purely supplement previous Green Belt evidence.
Harris Lamb obo Asset Storage Limited and Aniston Limited; Turley obo BDW Trading Ltd (Redrow); Bidwells obo Generator; PKR Planning Ltd – the earlier Green Belt Review should be undertaken in accordance with the methodology or requirements in Annex E of the 2026 NPPF.
Twenty5 Planning Ltd obo Lagan Homes; Pegasus Group obo Catesby Estates – the Strategic Transport Assessment should be updated following publication of the revised 2026 NPPF, particularly to include acknowledgment of ‘Well-connected’ rail stations.
Harris Lamb obo Pierpont Rose Holdings Ltd – the Infrastructure Delivery Plan should address renewable energy, the electricity network, telecommunications, water supply and wastewater infrastructure.
Turley obo BDW Trading Ltd (Redrow); Savills obo Bellway Strategic Land – the Council should explicitly identify which evidence-base documents will be newly prepared, revised or updated. Table 2 is currently unclear on this matter.
Savills obo JT Cocks Settlement Trust; Lichfields obo St Philips Land Ltd; Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – consider that the Housing and Economic Development Needs Assessment and Green Belt evidence should be updated to reflect current housing and employment requirements and changes to national planning policy. Also suggest consideration of wider housing and employment needs arising from neighbouring authorities and the wider West Midlands area.
Bidwells obo Generator – suggest additional evidence documents/clarity: Urban and brownfield capacity assessment; Safeguarded land assessment; Infrastructure cost apportionment within the Infrastructure Delivery Plan; Whole plan viability assessment; Education and health capacity evidence at planning area level; Bromsgrove Railway Station access and capacity study; Strategic Transport Assessment update; Duty to co-operate and cross-boundary evidence; Housing land supply and buffer position; and HEDNA update.
Cerda Planning obo Riva Land (Wythall) Ltd – evidence should consider affordability pressures, unmet housing needs arising across the GBBCHMA and the need for a flexible housing supply, including an appropriate buffer above minimum housing requirements.
Indurent Strategic Land Ltd – consider that evidence relating to employment land requirements should be updated to reflect the West Midlands Strategic Employment Sites Study, industrial and logistics market conditions, strategic employment needs and cross-boundary economic requirements.
Tetra Tech obo Miller Homes; Deloitte obo Church Commissioners for England – recommend additional evidence relating to housing trajectory, spatial strategy options, infrastructure baseline reporting and wider housing strategies. Also support joint working on cross-boundary matters and assessment of reasonable alternatives through the Sustainability Appraisal process.
RCA Regeneration Ltd obo St Phillips – support preparation of an updated Green Belt and Grey Belt Assessment and consider the evidence base should reflect current housing requirements, affordability pressures and recent changes to national planning policy.
IM Land – key evidence relating to housing and employment needs should be updated and any Grey Belt Assessment should be sufficiently granular to properly assess land performance. Also support an Infrastructure Delivery Plan identifying responsibilities, funding mechanisms and delivery phasing.

Lichfields obo CDF100 Ltd – the Council must reflect their current housing shortage; the Council can only demonstrate a 2.24 year supply of housing land (as of April 2026) and scored just 58% in the 2025 Housing Delivery Test. Encourage the Council to update their HEDNA to ensure that the Plan is underpinned by up-to-date information, reflecting the needs of the District and the wider Black Country FEMA. This will ensure the Council can plan for sufficient growth to meet the District's and wider area's employment needs.
Midland Land Limited – consider the evidence base should specifically assess specialist older persons housing needs, extra care accommodation, housing-with care provision, under-occupation of family housing and the role of downsizing in meeting housing needs. Also support additional viability evidence relating to specialist housing and monitoring of extra care delivery.
Evolve Planning obo Seven Homes – support the robust Site Assessment and Site Selection Methodology document.
CBRE obo Bournville Village Trust (BVT) – support preparation of updated housing need evidence, housing trajectory work, spatial strategy options and Grey Belt assessment to ensure the Local Plan can meet housing needs and maintain a deliverable supply of land.

BDC's response:

- 3.5.2 It is acknowledged that only 50% of respondents agree with the evidence base to support the Local Plan. Assessing the responses received, it is understood that some respondents may be prematurely disagreeing with the content specific elements of the evidence base, unknowingly requesting additional evidence that has already been identified as possible evidence, or disagreeing with the question as the final evidence base is not available for inspection at this time. As highlighted in the scoping document, new or updated evidence will be published on the Council's website when it is complete or at the time of the next consultation.
- 3.5.3 Some respondents also highlighted evidence base documents that we know may require updating or commissioning. A robust evidence base is essential to the preparation of a 'sound' and justified Local Plan. Suggestions for additional evidence, or for matters to be addressed through evidence already identified, will be considered as part of the plan-making process. As the Local Plan develops, it may also become necessary to prepare or commission further evidence to respond to emerging requirements.

3.6 Consultation & engagement strategy – Questions 7a, 7b, 8a, 8b and 9

- 3.6.1 The consultation and engagement section of the scoping document (section 7) explored and welcomed feedback on the consultation principles proposed to guide future consultation methods. The tables below provide a summary of matters raised and underneath BDC's response to questions 7a, 7b, 8a, 8b and 9.

Question 7a: Do you agree with the consultation principles identified? Yes / No / Unsure

Responses: 167

- Yes: 74%
- No: 14%

- Unsure: 12%

Question 7b: What else would you suggest?

Responses: 84

Summary of matters raised

Public responses

- Face to face consultation.
- A 'Digital-first' approach is fundamentally inadequate for rural settlements.
- Would like visually recorded meetings for evidence in the future.
- Education on the process for members of the public.
- Individual development proposals have their own consultations.
- Would like a greater emphasis on transparency and accountability and how consultation responses influence the plan.
- Establish well-moderated social media forums that are not dominated by toxic voices.
- Improve access to local information regarding developments via newspapers and other community venues.
- Would like specific information about developments that will directly impact them.
- Plain English consultation material and documents.

Consultation bodies and other stakeholders responses

- Churchill and Blakedown Parish Council – continue to consult with adjacent authorities and communities.
- Natural England – provide advice via a letter of response. Online consultation surveys or forms do not allow us to include all the information or links we think are important.
- NHS Herefordshire and Worcestershire Integrated Care Board – support continued engagement on health and infrastructure matters and welcome early involvement in plan preparation, recognising the long lead-in times associated with healthcare infrastructure planning.

On behalf of developers and landowners responses

- Tetra Tech obo Miller Homes; Deloitte obo Church Commissioners for England; CBRE obo Bournville Village Trust (BVT) – recommend publication of evidence at the start of consultation stages, opportunities for stakeholders to comment on material changes, and workshops covering spatial strategy, site selection, infrastructure and viability evidence.
- RCA Regeneration Ltd obo St Phillips, Ms P Wesner – suggest greater engagement with under-represented groups including younger people, households in housing need, affordable housing providers, local employers and older people.
- Savills obo Bellway Strategic Land – support a clear post-consultation process setting out how key issues and representations have been considered.
- IM Land – support greater ongoing engagement with landowners, developers and infrastructure providers through developer forums, meetings and continued dialogue throughout Local Plan preparation.
- Midland Land Limited – support continued engagement with parish councils, health and adult care stakeholders and specialist housing providers during preparation of the evidence base and Local Plan.

BDC's response:

- 3.6.2 Approximately three-quarters of respondents agree with the presented consultation principles. As highlighted in the scoping document, these principles will help shape the consultation methods for future Local Plan consultations. It is recognised that not all responses to question 7b specifically address consultation principles. Some comments instead relate to consultation methods, which are considered under questions 8a and 8b.
- 3.6.3 The Council's consultation and engagement strategy will guide future Local Plan consultation principles and methods, taking into account the feedback received. The Council recognises the importance of encouraging participation from a broad and diverse range of residents, groups, consultation bodies and the development industry. Respondents have provided a number of helpful suggestions for improving engagement, which will be considered when planning future consultations.

Question 8a: Do you agree with the potential consultation methods identified? Yes / No / Unsure

Responses: 164

- Yes: 63%
- No: 15%
- Unsure: 22%

Question 8b: What potential consultation methods would you change or add? Please explain your answer.

Responses: 74

Summary of matters raised

Public responses

- Wider and more inclusive engagement.
- Try to include those who do not normally participate.
- Listen to what people say rather than making assumptions about their views beforehand.
- Consult with Parish Councils.
- Consultation should involve listening and responding at a local level.
- Interactive maps could be beneficial.
- More meetings with stakeholders.
- Staffed public exhibitions at varying times.
- Email notifications to residents.
- The reference to focus groups seemed to exclude two key groups: residents of Bromsgrove District and regular visitors to Bromsgrove District for work, shopping and leisure.

Consultation bodies and other stakeholders responses

- Wyre Forest District Council – QR codes for ease of access to material.
- Community Campaigner – email and the ability to upload PDF Documents and associated research.
- NHS Herefordshire and Worcestershire Integrated Care Board – request continued direct engagement throughout Local Plan preparation and early

engagement on site options and reasonable alternatives so healthcare capacity considerations can inform site selection.
Historic England – request access to complete consultation documents in PDF or Word format and the availability of GIS shape files for proposed allocations to assist detailed assessment of heritage impacts.
On behalf of developers and landowners responses
Harris Lamb obo Barberry Bromsgrove Limited, Taylor Wimpey, Taylor Wimpey Strategic, Terra Strategic, Asset Storage Limited and Aniston Limited, and the Joint Consortium – suggest more innovative approaches to engage younger people and other groups who do not normally participate.
Twenty5 Planning Ltd obo Lagan Homes; Savills obo Bellway Strategic Land – engage with local housebuilders, developers and land promoters as they can provide insight into market demand, viability, deliverability and the attractiveness of locations for future growth.
Harris Lamb obo Taylor Wimpey – concern over the likely low response rate and focus from particular interest groups.
Bidwells obo Generator – establish a standing landowner and developer forum, or a small number of topic-based working groups, covering the strategic allocations, infrastructure delivery and the apportionment of infrastructure costs.
Bidwells obo Generator – where a strategic location is in more than one land ownership the Council should convene the landowners, together with WCC as highway and education authority, to agree a comprehensive masterplan, before the allocation policy is drafted.
Tetra Tech obo Miller Homes; Deloitte obo Church Commissioners for England; CBRE obo Bournville Village Trust (BVT); Carter Jonas obo Persimmon Homes South Midlands – support allowing report-style responses by email and ensuring respondents can submit information beyond prescribed consultation questions where relevant to plan preparation.
Turley obo BDW Trading (Redrow) – should continue to engage positively with adjoining authorities. Bromsgrove District does not operate in isolation.
Midland Land Limited – support continued use of email consultation and publication of responses and suggest additional guidance explaining specialist housing products and extra care accommodation to consultees.

BDC's response:

- 3.6.4 Approximately two-thirds of respondents agree with the identified consultation methods. The Council's consultation and engagement strategy will guide future Local Plan consultation principles and methods, taking into account the feedback received. The Council recognises the importance of encouraging participation from a broad and diverse range of residents, groups, consultation bodies and the development industry. Respondents have provided a number of helpful suggestions for improving engagement, which will be considered when planning future consultations.

Question 9: Do you consider there is anything else relevant to consultation that has not been mentioned?
Responses: 68
<u>Summary of matters raised</u>
Public responses

• How community-led evidence such as localised traffic logging, local flooding photographic logs, or parish-level infrastructure data will be weighted. • List answers from respondents and get them to list them in order of priority. • Emphasis on the need for open and non-prejudiced consultation. • Consideration of cross boundary developments. • Documents feel generic and have no detail on the actual questions. • Should prepare briefing sheets for Parish Councils to ensure a consistent message. • How will this benefit the residents who are currently living here. • Hagley train station is already at capacity and should not be used as a tool to promote growth in the area.
Consultation bodies and other stakeholders responses
• Churchill and Blakedown Parish Council – important to feedback the outcome of consultation to those who have contributed. • Alvechurch Parish Council – Village centre car parking requirements. • Natural England – Annex A for general advice for local plans. Annex B for air quality advice. Annex C for advice relating to soils and agricultural land quality. Annex D for green infrastructure local plan policy examples. • National Highways – wishes to continue engagement on evidence base documents, particularly the Strategic Transport Assessment and Infrastructure Delivery Plan, as the Local Plan progresses. • West Midlands Housing Association Planning Consortium – encourage ongoing engagement with Registered Providers and housing associations throughout the preparation of the Local Plan to help inform evidence and housing policies. • NHS Herefordshire and Worcestershire Integrated Care Board – recommend continued engagement with healthcare organisations, including acute and community healthcare providers, to ensure healthcare infrastructure requirements are reflected in the Local Plan and supporting evidence base. • Historic England – highlight Heritage Counts data and Historic England guidance as useful resources that may inform plan preparation, monitoring indicators and consideration of the historic environment.
On behalf of developers and landowners responses
• TwelveTwentyOne Planning – the move to a more strategic planning basis needs to be reflected in the consultation. • Turley obo BDW Trading Ltd (Redrow Midlands Division) – would like to see the NPPF reflected in the Local Plan; the Local Plan will need to consider the geographical location and housing requirements of the SDS (Spatial Development Strategy); housing delivery to date should inform policies and mechanisms to ensure a deliverable five-year housing supply; Green Belt and grey belt land should be prioritised for release where it can support housing delivery; monitor progress of the preparation of the Local Plan against the timetable; request that upcoming Local Government Reorganisation is seamless and does not impact the delivery of the Local Plan; and continued engagement with landowners and promoters to accommodate sustainable growth opportunities. • Turley obo BDW Trading Ltd (Redrow) – would like to see the revised NPPF reflected in the Local Plan; the Local Plan will need to consider the geographical location and housing requirements of the SDS (Spatial Development Strategy); housing delivery to date should inform policies and mechanisms to ensure a deliverable five-year housing supply; Green Belt and grey belt land should be prioritised for release where it can support housing delivery; monitor progress of the preparation of the Local Plan against the timetable; request that upcoming Local Government Reorganisation is seamless and does not impact the delivery of the Local Plan; and continued

engagement with landowners and promoters to accommodate sustainable growth opportunities.
Twenty5 Planning obo Midland Land Limited and Persimmon Homes South Midlands – highlight the need to meet housing needs in full and maintain a sufficient supply of deliverable housing land and provide a range of site sizes to ensure housing delivery throughout the plan period, particularly early in the plan period.

BDC's response:

- 3.6.5 A wide range of comments were submitted for question 9. A common response on the Smart Survey questionnaire was “no” to question 9 with no additional detail. Some of the responses raise similar points to other comments considered under previous questions. The relevant planning matters within the Council's remit will be considered as the Local Plan develops.

3.7 Responses to non-consultation questions

- 3.7.1 The table below summarises the responses received that do not specifically address one of the questions posed in the scoping document and underneath BDC's response.

Responses to non-consultation questions
<u>Summary of matters raised</u>
Public responses
Some responses from the public cite objections to specific sites across the district. As set out in the scoping document, this consultation does not address site-specific matters. These responses have been assessed, but site-related comments have not been summarised for the purpose of this document.
Concerns that views are ignored and previous objections remain.
Protect the Green Belt and ensure any review is supported by robust evidence. Any site assessment must demonstrate exceptional circumstances and consider reasonable alternatives.
Brownfield sites should be considered before Green Belt release.
Ensure that new development is accompanied by the necessary infrastructure including roads, public transport, schools, healthcare, drainage and utilities. Some request that the delivery of infrastructure is provided ahead of new development and is infrastructure-led.
Concerns about the increased impact of traffic on the road network.
Protect biodiversity, mature trees, hedgerows, habitats and achieve meaningful environmental improvements.
Protect existing green space and woodland.
Assess cumulative impacts of developments on traffic, air quality and local services and facilities.
Protect the distinct character and identity of Bromsgrove's town and villages and preventing inappropriate coalescence between settlements.
Opposition to the loss of leisure and recreational facilities and associated biodiversity loss.
Delivering high-quality, sustainable development that is energy efficient, resilient to climate change and well-integrated with existing communities.

• Ensure local residents are consulted openly at every stage of the Local Plan process, with clear explanations of the evidence used to support decisions. Additionally, ensure genuinely wide public engagement.
• The Plan is convoluted for people to respond efficiently.
• Bromsgrove district is losing too much rural food productive land.
• Ensure the UK Parliament's post on 'Understanding the 1.5°C global warming level: Implications for policy and adaptation' is followed.
• Accessible elderly housing should be prioritised.
• A clear site selection methodology should be published comparing all reasonable alternatives sites, including brownfield sites.
• The Plan should include settlement-specific design codes and density limits for sensitive edges. Infilling should also be considered.
• Concerns about the calculation of the Council's local housing need figure with a request to challenge the Government's standard method.
• Concerns about inappropriate 'speculative' applications in the absence of an up-to-date Local Plan and lack of a 5YHLS.
Consultation bodies and other stakeholders responses
• Community Campaigner – historic environment related guidance for design codes, construction methods and contractors.
• Community Campaigner – enhancement and protection suggestions and working with stakeholders for the betterment of designated and non-designated heritage assets.
• Community Campaigner – enhancement suggestions for conservation areas and suggestions to improve the permission process.
• Community Campaigner – appropriate improvements to historic buildings to combat climate change and provide economic benefits. Additionally, improvements to the outdoor environment e.g. maximising biodiversity, flooding and transport suggestions to mitigate climate change.
• Community Campaigner – suggestions for the application process, and enforcement penalties for the deliberate neglect to historic buildings.
• Natural England: ○ The Nature Recovery Network (which aims to expand and connect wildlife habitats to support species recovery and deliver wider benefits such as carbon capture, air and water quality improvements and recreation etc.) does not stand out as a key driver. The plan should include policies and proposals for nature recovery. ○ The LNRS should play an important role in informing and strengthening Local Plans by: identifying the most appropriate locations for habitat creation, restoration and enhancement, where actions are likely to deliver the greatest benefits for nature and the wider environment; and supporting all stakeholders in targeting investment and activity to areas where they can make the greatest contribution to nature recovery. ○ The Plan should map local ecological networks, including buffers and wildlife corridors and set out policies and proposals to safeguard and enhance the network, including contributions through development where appropriate. ○ Have a duty to conserve and enhance biodiversity. Local planning authorities are legally required to "take account" of LNRS' when developing Local Plans. It is vital to consider how areas mapped within a LNRS and the Potential Measures proposed are reflected in the plan, including the extent of safeguarding which should be applied. ○ The Worcestershire LNRS should help identify both potential areas of importance for biodiversity, the connectivity of ecological corridors and green infrastructure. It should inform development site assessments;

biodiversity net gain arrangements; site allocations and associated green infrastructure. ○ Reference should be made to the LNRS within the site allocations policy wording when available. This is in order to develop clear policies and strategies that give developers an indication as to what the requirements are in relation to nature recovery such as whether there are any areas that are of particular importance to biodiversity (as identified within the LNRS mapping) or whether there are any associated biodiversity actions recommended for a site (these can be found within the LNRS strategy).
● Campaign to Protect Rural England (CPRE) West Midlands – support greater cross-boundary cooperation, a brownfield-first approach, town centre regeneration, protection of strategic Green Belt gaps and important landscapes, and the use of brownfield land for solar generation whilst avoiding the loss of productive agricultural land.
● Active Travel England – should be informed by robust understanding of existing and future active travel and public transport networks, travel patterns and connectivity. Baseline evidence should include: analysis of travel patterns and mode choice; mapping of existing and planned active travel networks, public transport services and key local amenities; assessment of their connectivity by active travel and public transport informed by the DfT Connectivity Tool; identification of existing deficiencies in connectivity, accessibility and mode share; identification of factors affecting suitability and attractiveness of active travel and public transport; and review of Local Transport Plans, Local Cycling and Walking Infrastructure Plans, Rights of Way Improvement Plans, and Bus Service Improvement Plans.
● Active Travel England – Local Plan visions should be informed by baseline findings and adopt a vision-led approach, consistent with national policy, that prioritises sustainable travel. The vision should seek to maximise journeys made by active travel and public transport, reduce reliance on private car travel, and support wider health, equality, climate & environmental objectives. ● Expects vision statements to commit to growth that improves health, wellbeing, quality of life and environmental outcomes through increased use of active travel and public transport, including measurable increases in active travel and public transport mode share over the plan period.
● Active Travel England – evidence required to test options, proposed spatial strategy and site allocations: forecasts of active travel and public transport demand; demonstration that the spatial strategy and allocations have been informed by their ability to maximise access by active travel and public transport and support mode shift; how the proposed strategy will improve connectivity and accessibility to key destinations, and address identified constraints and deficiencies; identification of the active travel and public transport infrastructure and services required to support planned growth, together with evidence of their deliverability, including infrastructure requirements, costs, funding sources, phasing and implementation risks; assessment of cumulative impacts of proposed development on active travel and public transport networks, including cross-boundary impacts; and assessment of the contribution of the proposed strategy to public health, equality, inclusion, carbon reduction and wider environmental objectives.
● Active Travel England – where new or improved transport infrastructure is required, priority should be given to active travel and public transport interventions before consideration of highway capacity enhancements, in accordance with the transport hierarchy.
● Worcestershire Regulatory Services (WRS) – has no comments in regard to nuisance and air quality at this stage.

Forestry Commission – recommends that the Local Plan aligns with the NPPF to ensure the protection and enhancement of woodland areas. Additionally, trees play a crucial role in achieving BNG by providing habitats for wildlife, improving air quality, and contributing to climate resilience and therefore encourage the integration of tree planting and woodland creation into development plans to meet BNG requirements and enhance local biodiversity.
West Midlands Combined Authority (WMCA) – highlight Bromsgrove’s strong functional relationship with Birmingham and the wider WMCA area and request that the Local Plan has regard to cross-boundary housing and employment needs, emerging strategic planning work, sustainable transport networks and continued collaboration with neighbouring authorities & infrastructure providers.
Homes England – support the preparation and updating of evidence relating to housing need, infrastructure requirements, transport capacity and Green Belt/Grey Belt assessments. Emphasise the importance of robust up-to-date evidence, objective assessment of reasonable alternatives, prioritisation of brownfield land and sustainable development opportunities, and continued engagement with site promoters during the preparation of the Local Plan.
The Coal Authority – do not consider it would be reasonable to request inclusion of a policy, or a criteria, relating to land instability arising as a consequence of past coal mining activity as the Bromsgrove area has limited coal mining legacy at surface and shallow depth. Should development proposals take place in the area within the defined Development High Risk Area then consideration will need to be given to the risks this may pose. Any planning application should be supported by a Coal Mining Risk Assessment.
Hagley Parish Council – consider that previous consultation responses and supporting technical evidence demonstrate significant concerns regarding infrastructure capacity, including highways, schools, healthcare, parking, drainage and public transport. They also highlight concerns relating to Green Belt protection, settlement identity, flooding, biodiversity and the cumulative impact of development, and consider future growth should be aligned with infrastructure delivery and overall deliverability.
Fisher German obo National Grid Electricity Transmission – the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion.
South Staffordshire District Council – welcome greater recognition within the plan of cross boundary considerations, and a willingness to take into account the findings of any study relating to any unmet development needs in the Greater Birmingham and Black Country Housing Market Area when considering future housing requirements.
Worcester City Council – notes that severe traffic congestion has already been noted as a constraint. The new plan should also consider any implications for wider cross-boundary functions in relation to designated landscapes and ecological networks.
Worcester City Council – welcome working with BDC to consider any potential impact in relation to cross-boundary issues, such as housing and employment land requirements.
On behalf of developers and landowners responses
There were a substantial number of responses which provide commentary to support the promotion of their site and/or frame answers to the scoping questions around their site. As set out in the scoping document, this consultation does not address site-specific matters. These representations have been assessed, but site-related comments have not been summarised for the purpose of this summary document.

Planning Issues obo Churchill Living and McCarthy & Stone – advocate that the Local Plan does not need to have a specific older persons housing policy that details the locational requirements but instead the Local Plan should identify the older persons housing need and seek to allocate some sites to deliver such identified need.
- Planning Issues obo Churchill Living and McCarthy & Stone – must ensure that when setting M4(3) standards that the accompanying viability assessment correctly assess and includes additional cost for delivering this type of housing. M4(3) housing requires significant modifications to a typical unit beyond a M4(2) unit and must be bigger than M4(2) units to provide adaption such as wheelchair circulation space. Given the level of likely need for older persons housing, the council should be careful not to prejudice delivery through the imposition of overly prescriptive and unnecessary criteria. - McCarthy & Stone recently undertook a wheelchair user survey of all of its developments to understand the proportion of residents that use a wheelchair. This identified that only 2.7% of residents of occupied flats use a wheelchair in their apartments whilst 3.2% of residents use a wheelchair in communal areas.
Planning Issues obo Churchill Living and McCarthy & Stone – the viability of specialist housing for older people is more finely balanced than ‘general needs’ housing and that these housing typologies should be robustly assessed for viability and affordable housing separately to mainstream housing. Advice is provided on what should be noted within the viability assessment.
Planning Issues obo Churchill Living and McCarthy & Stone – our experience is that older person’s housing proposals will not viably provide affordable housing on a typical development site given that unit numbers will not generate sufficient affordable housing for a registered provider to have interest in acquiring units; typical sites are too constrained to accommodate mixed management arrangements; and viability has consistently demonstrated that it is not financially feasible to provide ‘policy compliant’ affordable housing. The affordable housing & housing mix policies should be applied flexibly in respect of older persons housing or a reduced/exempt affordable provision.
M A Fell obo the freehold owners of a site in Blackwell – identify a mix of site sizes capable of delivering homes early in the plan period and supporting the 5YHLS, support a site selection process that gives appropriate weight to small and medium-sized sites, housing choice for older people, and realistic evidence requirements. Also consider evidence used in site assessments should be robust and proportionate, and that plan preparation should avoid unnecessary delay and duplication of technical work.
Pegasus Group obo Catesby Estates – the Local Plan will have to be prepared within the remit of the policies within the August 2026 NPPF.
Pegasus Group obo Catesby Estates – noted the NPPF’s requirement for the Local Plan period to be at least 10 years post adoption and that strategic allocations often take more than 15 years to be delivered. Meaning a longer plan period may be necessary to be found sound at examination.

BDC’s response:

- 3.7.2 A wide array of comments are summarised above that were not specifically answering one of the questions in the scoping consultation document. However, it is noted that some of the responses relate to similar points summarised under the question tables in this document. The appropriate matters will be considered as the Local Plan progresses.

Section 4: Next steps

4.1 Next steps

- 4.1.1 The responses received to this scoping consultation, together with responses from previous consultations, including the Draft Development Strategy consultation last year, will inform the preparation of the Local Plan and the Council's engagement strategy for future consultations.
- 4.1.2 There will be two further opportunities to help shape the Local Plan. The next consultation is the proposed Local Plan content and evidence consultation which is anticipated to be held in June 2027 for a minimum of 6 weeks. The final consultation is expected to be held in March 2028 for a minimum of 8 weeks which is a consultation on the full draft Local Plan before it is submitted for independent examination. The anticipated key milestone dates can be found in the Local Plan timetable, available at <https://www.bromsgrove.gov.uk/BromsgrovePlan-timetable>.
- 4.1.3 The Council's website includes all information on the Local Plan; including the latest news; Local Plan timetable, notice of intention to commence local plan preparation, scoping consultation details, Gateway 1 self-assessment, evidence base, details of previous consultations held under the legacy plan-making system, and the privacy notice – <https://www.bromsgrove.gov.uk/council/policy/strategic-planning/emerging-bromsgrove-district-local-plan/>. This will be kept up to date throughout the preparation of the Local Plan, and any updates will be published there.