## **Examiners Questions**

| More than one representation          | Section/Para No.<br>Natural  | Steering Group Reply  |
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| •                                     | ואמנעומו   | The Steering Group would accept that the final sentence of para 6.16 could be amended slightly to   |
| objects to the assertion in paragraph | Environment Para   | something like:   |
| 6.16 of the Plan that "The NDP        | 6.16   |   |
| provides robust evidence for the      |  | "It is hoped that the NDP will provide useful background information about the area and local residents'  |
| forthcoming Green Belt Review about   |  | concerns when future strategic planning decisions related to the Bromsgrove District Plan Review and  |
| to be prepared by Bromsgrove          |  | other matters are taken by Bromsgrove District Council."  |
| District Council". This assertion is  |  |   |
| wrong because it is not actually the  |  |   |
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| -                                     |  |   |
| the Green Belt.                       |  |   |
| It may be reasonable for this part of | Natural  |   |
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|                                       |  |   |
|                                       | 0.15   |   |
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| have any comments on this line of     |  |   |
| thought?                              |  |   |
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|                                       |  | The objectives could be slightly reworded, replacing "We will" with "To". For example "To protect the   |
|                                       | -  | built, historical and natural environment" in Objectives  |
|                                       | 4.2  |   |
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| Objective 1: Even though a "where     | Vision &   | We would agree to replace Objective 1 with; "The plan will aim to protect the built, historical and natural   |
| possible" has been included,          | <b>Objectives</b> Para   | environment ensuring that our green spaces are protected".  |
| Objective 1 seeks to protect the      | 4.2  |   |
| Green Belt, which is beyond the       |  |   |
| scope of a NDP.                       |  |   |
| Further a representation sates that   |  |   |
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| · –                                   |  |   |
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|                                       | to be prepared by Bromsgrove<br>District Council". This assertion is<br>wrong because it is not actually the<br>case and neither would it be<br>appropriate for the NDP to present<br>evidence on a strategic issue such as<br>the Green Belt.<br>It may be reasonable for this part of<br>the text to record the concerns of<br>residents, as in paragraph 6.15, but it<br>is not appropriate for a document on<br>the verge of becoming part of the<br>Development<br>Plan to assert a position on a strategic<br>matter, as in paragraph 6.16. Do you<br>have any comments on this line of<br>thought?<br>Representations note related issues<br>within the wording of the Plan<br>Objectives (page 16). An overriding<br>issue is the use of the "We" opening<br>to each Objective; these are the Plan<br>objectives not ones personal to any<br>one body or group. Looking at some<br>of the Objectives individually:<br>Objective 1: Even though a "where<br>possible" has been included,<br>Objective 1 seeks to protect the<br>Green Belt, which is beyond the | to be prepared by Bromsgrove<br>District Council". This assertion is<br>wrong because it is not actually the<br>case and neither would it be<br>appropriate for the NDP to present<br>evidence on a strategic issue such as<br>the Green Belt.<br>It may be reasonable for this part of<br>the text to record the concerns of<br>residents, as in paragraph 6.15, but it<br>is not appropriate for a document on<br>the verge of becoming part of the<br>Development<br>Plan to assert a position on a strategic<br>matter, as in paragraph 6.16. Do you<br>have any comments on this line of<br>thought?<br>Representations note related issues<br>within the wording of the Plan<br>Objectives (page 16). An overriding<br>issue is the use of the "We" opening<br>to each Objective; these are the Plan<br>objectives not ones personal to any<br>one body or group. Looking at some<br>of the Objective 1: Even though a "where<br>possible" has been included,<br>Objective 1 seeks to protect the<br>Green Belt, which is beyond the<br>scope of a NDP.<br>Further a representation notes that<br>the review of the Green Belt will be<br>looking at its compliance with the 5<br>purposes of the Green Belt and none<br>of these is about protecting the rural |

| 5  | Objective 2: How the Parish Councils<br>engage with the Green Belt Review is<br>entirely at their own discretion, but<br>the Plan cannot be used to engage in<br>strategic matters which are beyond<br>the scope of a NDP.  | Vision &<br>Objectives Para<br>4.2                      | Objective 2 – we could change to: "and use this plan to help the Parish Councils engage in the District Plan<br>Review of Bromsgrove District Council."  |
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| 6  | Objective 5: I believe that the<br>Objective inverts what the Policies<br>are worded to achieve; is not the<br>intention to ensure that<br>infrastructure is provided<br>appropriately for planned<br>development and growth, not the<br>other way around?  | Vision &<br>Objectives Para<br>4.2                      | Objective 5 - could change to: "to ensure that infrastructure is provided appropriately for planned development and growth and that existing constraints are considered and addressed in new proposals wherever possible   |
| 7  | Objective 8: This seems to be a restatement of the Vision in different words?   | Vision &<br>Objectives Para<br>4.2                      | We do not feel that we need to make a change to objective 8. This is an overarching objective and refers to "local distinctiveness and contributes to a sense of place and well-being" which the vision does not.  |
| 8  | A representation has note the<br>discrepancy in dates between the<br>Vision statement and the Plan period<br>on the front cover – presumably<br>there has been a typographical error<br>in the former?  | Vision &<br>Objectives section<br>4.1                   | We acknowledge typo-should state 2018-30 not 2038.   |
| 9  | Whilst its nature and purpose is clear<br>I wonder how much Policy NE1 adds<br>to rather than potentially confuses<br>the guidelines already contained<br>within the Worcestershire Landscape<br>Character Assessment Supplementary<br>Guidance and the Lickey and<br>Blackwell Village Design Statement;<br>only guidelines 5, 6 & 7 appear to<br>relate to matters specific to the<br>Neighbourhood Area. | Natural<br>Environment<br>Policy NE1 Local<br>Landscape | We accept the examiner's point and propose to re-number 5,6,7 as 1,2, 3 whilst retaining the others guidelines and renumbering accordingly.<br>We have taken from the Worcs. Lands. Char. Assmt. (WLCA)To create this policy. We would like to keep this because many of those who could be voting on the NDP at referendum will not have read the original WLCA doc. or other associated documents  |
| 10 | In guideline 1:<br>The term "primary hedgerows"<br>appears to rely on a definition<br>provided outside of the<br>Neighbourhood Plan rather<br>reinforcing the concern about the<br>interplay between the Policy and<br>Worcestershire Guidance.   | Natural<br>Environment<br>Policy NE1 Local<br>Landscape | We would like to retain the term 'primary hedgerows' as it is used in the WLCA. Please refer to<br>Worcestershire Council's Landscape Type Advice Sheets for Planning and Development<br>http://www.worcestershire.gov.uk/downloads/download/809/planning_and_development_advice_sheets<br>Primary hedgerows are long established hedgerows.<br>Landscape Type Advice Sheet - Planning and Development<br>Wooded Hills and Farmlands<br>Opportunities for Landscape Gain<br>This notes:<br>"There may be opportunities to plant new hedgerows, restore, strengthen or protect existing hedgerows |

| 11 | Guideline1:<br>Whilst I am not an expert, my  | Natural<br>Environment<br>Policy NE1 Local              | and their patterns, and promote appropriate management – in terms of maintenance regimes and protection from stock. The species composition of existing primary (long established) hedgerows should be noted and used to guide the composition of new hedgerow planting. Fencing and other uncharacteristic boundary treatments could be removed and replaced by hedgerows." Landscapes of Worcestershire Landscape Type Advice Sheet - Planning and Development Settled Farmlands with Pastoral Land Use notes: "The defining pastoral land use of these landscapes is becoming diluted due to increased arable cultivation. Hedgerows lose their function and in turn may become neglected. Over the past years hedgerows have been removed, resulting in larger fields and a change in the scale of the landscape and, although the Hedgerow Regulations should now reduce such direct damage, deteriorating management is likely to continue. The loss and deterioration of hedgerows in turn threatens the survival of the hedgerow tree populations. Hedgerow trees, together with linear tree cover associated with watercourses, are particularly important, providing the defining tree cover element of these areas. There may be opportunities to plant new hedgerows, restore, strengthen or protect existing hedgerows and their patterns, and promote appropriate management – in terms of maintenance regimes and protection from stock. The species composition of existing long established hedgerows should guide the com-position of new hedgerows." We would delete: 'native berberis and pyrocantha' |
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|    | understanding is that there are no<br>"native" berberis and pyracantha as is<br>suggested.  | Policy NE1 Local<br>Landscape                           |   |
| 12 | Guideline 1:<br>A representation expresses concern<br>that an "appropriate scale" for<br>replacement trees is unexplained.  | Natural<br>Environment<br>Policy NE1 Local<br>Landscape | We propose to add in : 'which grows to an appropriate scale within the character of the area'.  |
| 13 | Guideline 4 refers to "permanent<br>pasture around the edges of existing<br>settlements" but it is unclear and<br>unexplained why these pastures in<br>particular are key to avoiding the<br>merger of settlements. A<br>representation points out that some<br>of these pastures might contribute a<br>sustainable extension to an existing<br>settlement, and this could be<br>achieved without a threat of merging.<br>The part of this guideline relating to<br>historic field patterns ought also to<br>subject to the "where possible"<br>caveat. | Natural<br>Environment<br>Policy NE1 Local<br>Landscape | We agree that 'where possible' could be added<br>The above advice sheet also sets out that:<br>" The remaining areas of permanent pasture can often be of significant biodiversity interest and initiatives<br>to safeguard them should be strongly promoted in these areas."<br>The advice sheet goes on to explain:<br>"The distinctive settlement pattern of this Landscape Type - scattered farmsteads and groups of wayside<br>dwellings - is best perpetuated by the avoidance of significant new development. Creating clustering or<br>settlement nuclei through new development is inappropriate to the characteristic settlement pattern<br>while current planning guidance precludes dispersed settlement in the landscape in general.<br>Consequently, significant amounts of new development will generally be discouraged from these<br>landscapes, being better sited in those landscapes where settlement clusters and nuclei are appropriate."<br>Landscape Type Advice Sheet - Planning and Development<br>Wooded Hills and Farmlands<br>Opportunities for Landscape Gain   |

|    |  |   | This notes:   |
|----|--|---|---|
|    |  |   | "Within the farmed areas, the upper slopes may include areas of permanent pasture of botanical interest."   |
|    |  |   | Therefore there are landscape character and biodiversity reasons why primary hedgerows and areas of permanent pasture should be protected.  |
| 14 | In guideline 5 it is unclear whether<br>viewpoint A is from the top of Old<br>Birmingham Road or whether it is<br>views "from" everywhere else toward<br>that point.   | Natural<br>Environment<br>Policy NE1 Local<br>Landscape Map 4 | We propose deleting this viewpoint altogether   |
| 15 | Map 4 that is referenced here surely<br>shows the locations referred to as<br>"viewpoints" rather than, as the title<br>says, "Photographic Locations"?  | Natural<br>Environment<br>Policy NE1 Local<br>Landscape Map 4 | We will change the map title to 'Photographic Viewpoints'   |
| 16 | In guideline 6 there may be many<br>potential interpretations of the term<br>"impacts". I believe that if 'and<br>addressed' is added to guideline 5<br>after "considered" then the need for<br>the largely repetitious guideline 6<br>falls away.   | Natural<br>Environment<br>Policy NE1 Local<br>Landscape       | Guideline 6 - could be deleted if "and addressed" is added to 5 as suggested  |
| 17 | In guideline 9 there appears to be a stray inverted comma.   | Natural<br>Environment<br>Policy NE1 Local<br>Landscape       | We acknowledge the guideline 9 - typo and we will delete the inverted comma at the end  |
| 18 | I note that "Wildlife Importance<br>Areas" are divided into two<br>categories: SSSIs and LWSs but on<br>Map 5 the key, confusingly, shows<br>the latter as   | Natural<br>Environment NE2<br>Para 6.23                       | We propose to change the wording in the text to match the key on the map. In policy NE2 we could<br>change the terminology to 'Areas of Wildlife Importance' from 'local wildlife habitats', we will label<br>everything in the text as 'Areas of Wildlife Importance'. |
| 19 | "Areas of Wildlife Importance" and<br>the Policy refers to these as "local<br>wildlife and habitats" and later<br>"biodiversity networks and wildlife<br>corridors"; because of the shifting<br>terminology it is difficult to interpret<br>whether these all mean the same<br>thing or not. | Natural<br>Environment NE2<br>Para 6.23                       | We note that the terminology is inconsistent and propose to amend and replace the first paragraph of NE2<br>with 'Development proposal that impact on Areas of Wildlife importance identified on Map 5 (p.35)'  |
| 20 | In paragraph 6.29 it is suggested that<br>"it is important for our [the] NDP to<br>protect the reservoirs and<br>surrounding Green Belt area from<br>development as required in the  | Natural<br>Environment Para<br>6.29                           | 6.29 – we agree - "inappropriate" could be added before development.  |

| 21 | NPPF"; but as is clear from the<br>quotation from the NPPF and<br>representations, there is no absolute<br>protection from all development and<br>accordingly 'inappropriate' is needed<br>immediately before "development".<br>As noted in paragraph 6.30,<br>"Distinctions should be made<br>between the hierarchy of<br>designated sites"; therefore the<br>'according to their significance' needs<br>to be added to the first paragraph of<br>Policy NE2.                                 | Natural<br>Environment Para<br>6.30          | WE agree to the suggested changes to Policy NE2 : 'according to their significance' needs to be added to the first paragraph of Policy NE2 |
|----|--|--|--|
| 22 | The third paragraph of the Policy says<br>"Ponds are protected" but it is<br>unclear whether this means that<br>higher level policies already protect<br>all "ponds" or whether it is intended<br>that Policy NE2 "protects" ponds;<br>whichever is the case, absolute<br>"protection" should not be implied<br>and it is difficult to see why<br>paragraph 1 would not include ponds.<br>A representation notes that a "where<br>possible" needs to be added to<br>sentence 2 of paragraph 3. | Natural<br>Environment Para<br>6.30          | Policy NE2 third paragraph - could change to "Ponds should be protected"   |
| 23 | Paragraphs 6.30 and 6.33 appear to be duplicates.  | Natural<br>Environment Para<br>6.30 and 6.33 | Noted, we will remove 6.33   |
| 24 | Paragraph 6.42 says that "Policy NE3<br>a GI approach to new<br>developmentwith a higher level of<br>detail relevant to the Neighbourhood<br>Area; I would question whether there<br>is actually any additional detail<br>provided and it is often a lack of<br>detail that will give rise to confusion.   | Natural<br>Environment NE3<br>Para 6.42      | We suggest removing 'with a higher level of detail relevant to the Neighbourhood Area' in 6.42   |
| 25 | Paragraph 1 says it relates to "New<br>development" but most if not all of<br>the development for which the Plan<br>provides is on brownfield land and<br>below the scale where these<br>provisions would be relevant.   | Natural<br>environment<br>Policy NE3         | We should delete 'New'<br>Should be 'Development   |
| 26 | The target audience for Paragraph 2 is unclear; it reads more as a   | Natural<br>Environment                       | We disagree and think that para 2 in the policy is a requirement for GI networks referencing LBCH  |

|    | statement of fact.  | Policy NE3  |  |
|----|---|---|--|
| 27 | Paragraph 3 refers to "examples" but<br>it is unclear why those "examples"<br>have been chosen; this does not<br>seem to imply a very integrated<br>approach. Would "footpaths,<br>bridleways, cycleways" ever not be<br>appropriate?   | Natural<br>Environment<br>Policy NE3                      | Noted, we would suggest deleting the 3 <sup>rd</sup> paragraph.  |
| 28 | Paragraph 6.41 notes the Bromsgrove<br>DC commitment to a GI network but<br>paragraph 4 of Policy NE3 appears to<br>expect the network to be created and<br>sustained by developers?  | Natural<br>Environment<br>Policy NE3 Para<br>6.41         | Noted, we would suggest deleting the final line/paragraph  |
| 29 | I note that the headline here suggests<br>a Policy applicable to a specific,<br>significant part of the Neighbourhood<br>Area. Whilst the geology of the area is<br>described, no mapped detail is<br>included or referenced. The Policy<br>NE4 wording however, appears to be<br>non-area specific and it is difficult to<br>see how the development for which<br>the Plan provides is likely to affect or<br>be affected by geodiversity; I note<br>that the area referenced in the<br>headline is already the subject of<br>higher level protections.<br>Your consideration of where Policy<br>NE4 provides additional detail for the<br>Neighbourhood Area would be<br>helpful. | Natural<br>Environment<br>Geodiversity<br>Policy NE4      | We have links to maps to include in the text or the appendices:<br>for the whole site and explanation https://ehtchampions.org.uk/ch/worcestershire-sites/lickey-hills-<br>quarries<br>Map of the geology: https://ehtchampions.org.uk/ch/wp-content/uploads/Geo-Champs-Panel_50.jpg |
| 30 | Whilst the context for Policy BD1 is<br>well described, the need for the<br>Policy and the clarity of the wording<br>are much less clear. Given that there<br>is existing material describing the<br>significance of the Conservation Area<br>is Policy BD1 serving any additional<br>purpose?  | Built Heritage<br>BD1 Barnt Green<br>Conservation<br>Area |  |
| 31 | Paragraph 1 of Policy BD1, if<br>paraphrased, says 'proposals<br>impacting on the Conservation Area<br>must demonstrate careful<br>consideration of any potential<br>impacts on the setting of the<br>conservation area' but surely first   | Built Heritage<br>BD1 Barnt Green<br>Conservation<br>Area | We propose deleting the policy and also providing a reference to the NPPF.   |

| 32 | consideration should be for the<br>nature of their impact on the<br>Conservation Area itself?<br>There is no specific reference to<br>heritage assets such as listed<br>buildings either within or within the<br>setting of the Barnt Green<br>Conservation Area. The issue<br>addressed by paragraph 1 appears to<br>be addressed with greater clarity<br>within the NPPF.   | Built Heritage<br>BD1 Barnt Green<br>Conservation<br>Area                                     |   |
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| 33 | Paragraph 2 requires that the<br>prospective developer "describe" the<br>significance of any heritage asset, but<br>that description and comparative<br>assessment is provided for each<br>designated heritage asset by its<br>official listing. The issue addressed by<br>paragraph 2 appears to be addressed<br>with greater clarity within the NPPF.   | Built Heritage<br>BD1 Barnt Green<br>Conservation<br>Area                                     |   |
| 34 | Paragraph 3 refers to Character<br>Appraisal areas, by which I presume is<br>meant the three areas of Shepley,<br>Fiery Hill and Cherry Wood, though I<br>don't believe these have previously<br>been termed 'Character Areas'.<br>Whilst such detail is specific to the<br>Barnt Green Conservation Area the<br>Policy expectation can only be<br>applied by reference to the source<br>Character Appraisal material and I<br>wonder therefore whether Policy BD1<br>adds any detail to policy material<br>already being implemented.<br>Your consideration of where Policy<br>BD1 provides additional detail for the<br>Neighbourhood Area would be<br>helpful. | Built Heritage<br>BD1 Barnt Green<br>Conservation<br>Area                                     | We suggest deleting the last 6 words - 'as described in the character appraisals'.  |
| 35 | Paragraph 7.19 notes that the<br>character appraisal for the Blackwell,<br>Lickey and Cofton Hackett<br>settlements is available as a<br>"background document"; however<br>the wording of several paragraphs of<br>Policy BD2 binds developers to "take<br>into consideration" the appraisals.<br>Despite the prominence afforded to<br>the appraisals the website shows a<br>link to an "unfinished joint Character  | Built Heritage &<br>Design Para 7.19<br>and Policy BD2<br>Encouraging High<br>Quality Design. | We would like to assure you that work is ongoing with the character appraisals and we will have the completed documents on our website very soon. |

|    | Appraisal for Lickey and Blackwell and<br>Cofton Hackett"; the status of the<br>character appraisal(s) and the use of<br>multiple references therefore need<br>clarification. A representation<br>questions the accuracy of the<br>reference within the Character<br>Appraisal to land at Cofton Lake Road<br>since the private ownership of parts<br>of the land is not acknowledged.   |  |   |
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| 36 | Policy BD2 does appear to have<br>regard for the NPPF expectation (para<br>59) that Plans should "avoid<br>unnecessary prescription or detail<br>and should concentrate on guiding<br>the overall scale, density, massing,<br>height, landscape, layout, materials<br>and access of new development in<br>relation to neighbouring buildings<br>and the local area more generally".<br>However the wording of the Policy<br>does have shortcomings (beyond the<br>character appraisal issue noted<br>above):<br>Principle 1 inappropriately seeks to<br>bind Bromsgrove DC to a particular<br>approach in their review of the Green<br>Belt. | Built Heritage &<br>Design<br>Encouraging High<br>Quality Design<br>BD2<br>Principle 1 | We suggest removing the last sentence of the guideline.                             |
| 37 | In Principle 2 "significant and<br>unacceptable increases" is open to a<br>wide interpretation. The NPPF says<br>(para 58), whilst acknowledging that<br>policies "should be based on stated<br>objectives for the future of the area<br>and an understanding and evaluation<br>of its defining characteristics",<br>policies should "optimise the<br>potential of the site to accommodate<br>development". It may therefore be<br>sufficient for reliance to be placed on<br>an assessment of the "character of<br>the surrounding area".   | Built Heritage &<br>Design<br>Encouraging High<br>Quality Design<br>BD2<br>Principle 2 | We agree and would suggest removing 'significant and unacceptable' from the policy. |
| 38 | In Principle 3 I am unclear why regard<br>should be had for the WCC Parking<br>Standards "where possible"?   | Built Heritage &<br>Design<br>Encouraging High<br>Quality Design<br>BD2<br>Principle 3 | We suggest removing 'wherever possible' in line with WCC parking standards          |

| 39 | In Principle 5 I am uncertain that<br>every development at whatever scale<br>will be able to "identify and include<br>opportunities for positive change"; I<br>think that this is a "where possible".   | Built Heritage &<br>Design<br>Encouraging High<br>Quality Design<br>BD2<br>Principle 5 | We agree and suggest inserting 'where possible'   |
|----|---|--|---|
| 40 | In Principle 6 it is unclear why the<br>opening reference to the character<br>appraisals is insufficient and why the<br>"Victorian and Edwardian properties"<br>have been singled out for mention,<br>particularly since this sits uneasily<br>with Principle 7 which says that<br>"proposals need not imitate earlier<br>architectural periods or styles".                                   | Built Heritage &<br>Design<br>Encouraging High<br>Quality Design<br>BD2<br>Principle 6 | We would suggest changing 'positively' to 'sympathetically' and prefer to make no other changes   |
| 41 | In Principle 7 it is said that "New<br>buildings should follow a consistent<br>design approach"; I presume this is<br>meant to relate to 'each<br>development' rather than 'every<br>development' but even then it is<br>difficult to see a justification for this<br>requirement when the "character of<br>the surrounding area" is unlikely to<br>demonstrate such a characteristic.        | Built Heritage &<br>Design<br>Encouraging High<br>Quality Design<br>BD2<br>Principle 7 | We suggest deleting the 2 <sup>nd</sup> to last sentence – 'New buildingsroofline to the building'.   |
| 42 | It is unclear why the issue of<br>"Backland development" justifies its<br>own Policy when it is the type of issue<br>that might adequately be addressed<br>within the "settlement principles"<br>which are the subject of Policy BD2.<br>This concern is rather reinforced by<br>the confused nature of Policy BD3:   | Built Heritage &<br>Design Policy BD3<br>Garden and<br>Backland<br>Development         | We feel that this is an important issue in the BDC area. We propose to delete 'rear' & ref 8.198 of BDC district plan.<br>We propose to rename the policy 'Residential Development in Gardens'<br>We feel no other change is needed |
| 43 | Paragraph 1 says that the Policy is<br>concerned about the loss of "mature<br>trees, hedges and shrubbery" but<br>paragraph 3 requires that "buildings<br>should be sited and designed to<br>protect existing mature trees and<br>hedgerows on the site". It is also<br>unclear at what point the loss of back<br>garden amounts to a "substantial<br>increase in the density of built form". | Built Heritage &<br>Design Policy<br>BDP3 Garden and<br>Backland<br>Development        | We agree that this requires change – densification/openness is important in our area, we feel that it<br>erodes the character of our local area, could you please suggest how we could reword this?                                 |

| 44 | Paragraph 2 appears to extend to all<br>"private gardens" not just rear<br>gardens; there is also a lack of clarity<br>as to how a developer could "support<br>the need for higher density<br>development" other than to show<br>that there is an acknowledged<br>housing requirement for the<br>Neighbourhood Area and Policy H1<br>supports the provision of additional<br>housing within existing settlements. | Built Heritage &<br>Design Policy BD3<br>Garden and<br>Backland<br>Development  | We suggest changing the wording from 'where such development schemes are considered acceptable' to<br>'where such development schemes are proposed'   |
|----|---|---|---|
| 45 | The protection of "the residential<br>amenity and privacy of neighbouring<br>occupiers" referenced in paragraph 3<br>only apparently becomes an issue<br>after "such development schemes are<br>considered acceptable.  | Built Heritage &<br>Design Policy BD3<br>Garden and<br>Backland<br>Development  | We propose to remove the word 'acceptable'  |
| 46 | A representation notes that the Policy<br>could be self-defeating since it will<br>frustrate the delivery of a sufficient<br>quantum of housing thus making the<br>need for the release of Green Belt<br>land the more likely.<br>Do you have any comments on this<br>line of thought?  | Built Heritage &<br>Design Policy<br>BDP3 Garden and<br>Backland<br>Development | <ul> <li>We have taken advice from Bromsgrove District Council and would propose not making any changes:<br/>Rear garden development was raised as a concern by residents and they believe this is a concern.</li> <li>The revised NPPF also states in para 9 that " Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area." In addition para 122 sets out that "Planning policies and decisions should support development that makes efficient use of land, taking into account:</li> <li>d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change." The NDP area is a relatively prosperous area and is not in need of regeneration. Therefore the desire to maintain the area's character and setting is the higher priority. The criterion cross references to Policy BD3 which provides more detailed justification.</li> </ul> |
| 47 | A Neighbourhood Plan, particularly<br>one on the verge of becoming part of<br>the Development Plan, should not be<br>used as a campaigning document.<br>Accordingly the references to the<br>Parish Council activities around the<br>Green Belt Review, as included in<br>paragraphs 8.8 and 8.9, should<br>therefore be omitted.   | Housing Para 8.8<br>and 8.9   | We agree and suggest we Remove the last 2 sentences of 8.8 and in 8.9 delete 'Both PCsGreen Belt<br>Review' (4th sentence).   |
| 48 | I note that Policy H1 is titled "New<br>Housing within Existing Settlements"<br>but the Policy wording provides also<br>for "Development of previously<br>developed land in the Green Belt".<br>The NPPF (section 9) does not provide<br>for unconstrained development in the<br>Green Belt even of previously<br>developed land; accordingly I believe<br>that Policy H1 should keep within the                  | Housing Policy H1   | We agree and suggest that we remove 'Development of PDL in the Green belt' and replace with<br>'Development'  |

|    | range described in the title.   |  |   |
|----|---|--|---|
| 49 | Looking at other aspects of the Policy:<br>Is criteria 2 appropriate if all the sites<br>are within existing settlements?   | Housing Policy H1                      | We feel that we should retain the policy as it covers access to more rural areas of the NDP. Not all parts of the built up area have good access to public transport - the point about high levels of car traffic on narrow lanes and the need to provide more sustainable alternatives is made in Section 9. |
| 50 | Within criteria 3 I am puzzled as to<br>why "odour" should be a factor for<br>residential development.  | Housing Policy H1                      | Criteria 3 - "odour" could be deleted. Should it be "disturbance"?  |
| 51 | Is criteria 4 relevant if all the sites are<br>within existing settlements?<br>Your comments on these lines of<br>thought are invited.  | Housing Policy H1                      | We propose to delete this criteria 4 as the actual problem is referred to elsewhere   |
| 52 | The first paragraph of Policy H2 uses<br>the future tense whereas 'is<br>encouraged' would seem more<br>appropriate.  | Housing Policy H2<br>Housing Mix       | We agree with your comment and will change as suggested to 'is encouraged'  |
| 53 | The evidence from which the<br>approach of paragraph 2 is drawn is<br>all quite old – 2010 and 2011. A<br>representation points out that<br>smaller dwellings are vacated as<br>families grow and move into larger<br>family dwellings. I think the best that<br>Policy H2 can do is the require<br>developers to evidence regard for<br>current, local housing requirements<br>and the needs of older and younger<br>households in particular.<br>Do you have any comments on this<br>line of thought?   | Housing Policy H2<br>Housing Mix       | This is supported by BDP7 and the most up-to-date evidence. We agree with your comment and would<br>suggest adding in; 'The mix of housing will be informed by the most recent evidence and should have<br>regard for current, local housing requirements and the needs of older and younger households'.     |
| 54 | Whilst I can see that Policy H3 is<br>based on some evidence of need,<br>unfortunately a Written Ministerial<br>Statement of March 2015 said: "From<br>the date the Deregulation Bill 2015 is<br>given Royal Assent, local planning<br>authorities and qualifying bodies<br>preparing neighbourhood plans<br>should not set in their emerging Local<br>Plans, neighbourhood plans, or<br>supplementary planning documents,<br>any additional local technical<br>standards or requirements relating to<br>the construction, internal layout or<br>performance of new dwellings". | Housing Policy H3<br>Energy Efficiency | We agree with your comment and propose to change "should" to "are encouraged to".   |

| 55 | Accordingly whilst the Policy might<br>'encourage' an approach it cannot<br>make it an obligation.<br>Your comments on this line of<br>thought are invited<br>I note that within paragraph 9.6 there<br>is a repetition of the sentence<br>regarding the popularity of cycling.   | Infrastructure<br>para 9.6  | We note the typo and will remove second " Cycling is a popular pastime and"  |
|----|---|---|--|
| 56 | Within Policy INF1 paragraph 2 it is<br>unclear what "measures" to be<br>provided might imply; an obligation<br>re traffic speeds that extends to the<br>whole Plan area is both unreasonable<br>and unrealistic.<br>As a representation notes, the<br>obligation regarding electric charging<br>points might more appropriately be<br>expressed as an infrastructure<br>requirement. The representation<br>from the County Council notes that all<br>developments must meet the<br>requirements of the Council's<br>Streetscape Design Guide, which<br>could be referenced here or within<br>Policy BD2. | Infrastructure<br>Policy INF1<br>Supporting<br>walking and<br>cycling and<br>improvements in<br>local transport<br>infrastructure | We note your comment and we would suggest:<br>removing the words 'developers should provide measures which' and replace with 'New development<br>should consider'.<br>add in 'where possible' to the last para re: electric charging points.<br>Reference the streetscape design guide and include in appendices |
| 57 | The very specific requirements of<br>Policy INF2 are not peculiar to the<br>Neighbourhood Area and largely<br>relate to larger scale developments<br>incorporating open space for which<br>the Plan does not provide. I would<br>have thought it would be sufficient to<br>include this matter briefly within<br>Policy BD2 with a suitable reference<br>for the detail.  | Infrastructure<br>Policy INF2<br>providing Safe<br>and Accessible<br>Environments for<br>all                                      | We agree with your comment and would like to include this in BD2, could you please suggest appropriate wording?  |
| 58 | Within Policy INF3 there is no<br>purpose in saying that telecoms<br>infrastructure will be "actively"<br>encouraged since such an obligation<br>cannot be put on the officers of<br>Bromsgrove DC. The expectation that<br>"any new development" will have a<br>superfast broadband connection<br>cannot realistically extend to small<br>infill developments; the expectation<br>may be more realistic for larger   | Infrastructure<br>Policy INF3<br>Communication<br>Technologies  | Perhaps we should change "actively encouraged" to "supported"<br>Perhaps change "Any" to "Wherever possible". In a built-up area most, if not all, new development could<br>link to existing networks.   |

|    | developments.  |  |   |
|----|--|--|---|
| 59 | On the face of it, it would avoid<br>repetition and duplication if Policies<br>CF1 and CF2 were merged;  | Community<br>Facilities Policy<br>CF1 Protecting<br>existing<br>community<br>facilities and<br>supporting<br>investment in   | We agree that CF1 and CF2 could be merged.<br>CF1 4th criterion could be deleted.<br>We would suggest adding some supporting text to explain that the PCs will work with Worcestershire<br>County Council on Highways and traffic management.   |
| 60 | The fourth criterion of Policy CF1 is<br>not a land use issue and therefore<br>ought to be omitted from both<br>Policies.  | new facilities<br>Community<br>Facilities Policy<br>CF1 Protecting<br>existing<br>community<br>facilities and<br>supporting<br>investment in<br>new facilities     |   |
| 61 | In relation to Policy CF2 I note that<br>Barnt Green Sailing and Fishing Club<br>is located outside the Neighbourhood<br>Area and therefore this should not be<br>included within either Policy.   | Community<br>Facilities Policy<br>CF2 Protecting<br>existing open<br>spaces and<br>recreational<br>facilities and<br>supporting<br>investment in<br>new facilities | Part of the sailing club waters are in Cofton Hackett, we propose updating our map of Open Spaces to indicate this.   |
| 62 | It would seem, prior to viewing their<br>scale and locations, the sites<br>proposed for designation as Local<br>Green Spaces are appropriate.<br>However, Planning Practice Guidance<br>notes, "If land is already protected by<br>designation, then consideration<br>should be given to whether any<br>additional local benefit would be<br>gained by designation as Local Green<br>Space" (Paragraph: 011 Reference ID<br>37-011-20140306). Your comments<br>are invited on whether the proposed<br>Local Green Spaces are already<br>sufficiently protected. I would also<br>comment that my Report is going to<br>recommend that the Spaces are<br>identified on larger scale maps so that<br>there can be no ambiguity about the<br>boundaries of the designated areas. | Community<br>Facilities Policy<br>CF3 Local Green<br>Spaces  | We propose updating our map of Open Spaces. We have taken advice from Bromsgrove District Council on<br>this point:<br>They feel that it is fine including the Green spaces as it is locally specific. BDP25.3 does protect designated<br>and undesignated areas of outdoor open space, sport and recreation.<br>Open space survey:<br>7.47 highlights a clear deficiency of provision in the Parish of Cofton Hackett<br>(Bromsgrove North). |
| 63 | For clarity I feel that the first part of  | Commercial &   | We agree and we would suggest that we should start B1 with criterion 4.   |

|    | Policy B1 ought to start with the       | Business Interests |  |
|----|---|--------------------|--|
|    | stipulation that it applies to certain  | Policy B1          |  |
|    | parts of the Neighbourhood Area         | Supporting         |  |
|    | only, rather than leave it to criterion | Appropriate Local  |  |
|    | 4 for this to be revealed.              | Enterprise         |  |
| 64 | In Policy B2 the opening words before   | Commercial &       | We propose to take out 'it would be part of' in B2.2                                 |
|    | the colon do not match with the         | Business Interests |  |
|    | wording of criterion 2. It is unclear   | Policy B2          |  |
|    | whether Policy B2 is to apply across    | Supporting Home    |  |
|    | the Neighbourhood Area but              | Working            |  |
|    | paragraph 90 of the NPPF is             |                    |  |
|    | potentially more restrictive on the     |                    |  |
|    | reuse of buildings in the green Belt.   |                    |  |
| 65 | The wording here has been overtaken     | Next Steps         | Yes we agree with your point and await your advice.                                  |
|    | by events but this section might        |                    |  |
|    | usefully commit to keeping the          |                    |  |
|    | impact of the Plan monitored and        |                    |  |
|    | Plan reviews at least every 5 years.    |                    |  |
|    | Would you agree? Representations        |                    |  |
|    | note that a commitment to review        |                    |  |
|    | the Plan following the adoption of the  |                    |  |
|    | new Bromsgrove Local Plan would be      |                    |  |
|    | appropriate.                            |                    |  |
|    |   |                    |  |
| 66 | Now that the Plan has completed all     | Appendices         | We agree and we suggest removing this section.                                       |
|    | its formal consultations, these         | National Planning  |  |
|    | quotations have served their purpose    | Policy Context     |  |
|    | (and are now out of date). Would you    |                    |  |
|    | agree?                                  |                    |  |
| 67 | These leaflets help to add some         | Appendices Lickey  | We will make sure that they are available on our PC website and include a reference. |
|    | further insight into the character of   | and Blackwell      |  |
|    | the area but it would be useful to      | Tree Leaflets      |  |
|    | know from where they might be           |                    |  |
|    | obtained or downloaded.                 |                    |  |
| L  | 1                                       | 1                  |  |