

Our ref: JBB8317 - C7626

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Date: 08 April 2021

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Sent via email

Dear Sir/Madam,

Catshill and North Marlbrook Neighbourhood Development Plan – Regulation 16 Representations

- 1.1. RPS Consulting Services Ltd (RPS) is instructed by Gleeson Strategic Land (GSL) to represent their interests in relation to the Catshill & North Marlbrook Neighbourhood Development Plan (CNMNDP) and to formally respond to the Regulation 16 Submission Consultation being consulted on by Bromsgrove District Council (BDC). The latest consultation runs until 08 April 2021.
- 1.2. RPS has formally responded to previous rounds of consultation on the CNMNDP, this being the response to the Regulation 14 Pre-Submission Consultation dated 02 November 2020 (referred to here as 'our Regulation 14 Response' and included with this letter for convenience, including accompanying appendices A-G) and the response to Catshill and North Marlbrook Neighbourhood Plan Consultation June 2018, letter dated 31 July 2019 (for information, the site of interest here was previously referred to as 'Land East of Birmingham Road', but is referred to here as 'Land North of Braces Lane' or simply here as 'the site').
- 1.3. GSL supports Catshill & North Marlbrook Parish Council (CNMPC) in progressing the CNMNDP and RPS has held meetings with the Parish Steering Group (in January 2019) on the site on behalf of GSL.
- 1.4. Despite supporting the principle of preparing an NDP for the Catshill & North Marlbrook Parish area (the Parish) GSL has concerns with various policies and other related aspects of the published documents. This is set out in more detail in the following sections of this letter and in sections 3, 4 and 5 of our Regulation 14 Response. In our view CNMPC has not satisfactorily addressed the majority of the concerns that we, and other representatives of the development industry, have raised. As such this letter summarises these concerns and identifies the relevant sections of our Regulation 14 Response where we expand upon these points.
- 1.5. These concerns are exacerbated by section 6.7 of the Consultation Statement, published as part of the Regulation 16 Submission Consultation, which contains a selective list of supportive quotes which are presented as typical responses to the Regulation 14 consultation. While RPS understand the desire of CNMPC to present a positive picture of the responses received from the consultation process

so far, the Consultation Statement presents an inaccurate reflection of the responses to the Regulation 14 consultation which included significant concerns raised by various parties. The report also suggests that responses from land owners or their agents were limited to comments regarding the proposed Local Green Spaces, which ignores concerns raised with other aspects of the CNMNDP.

- 1.6. RPS must express our concerns in respect of various aspects of this submission version of the CNMNDP. These concerns are that aspects of the CNMNDP do not meet the 'basic conditions' as set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).
- 1.7. In particular, RPS consider the CNMNDP does not meet the following:
 - (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
 - (d) the making of the order contributes to the achievement of sustainable development,
 - (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- 1.8. We are concerned that the CNMNDP does not meet relevant aspects of policy within the National Planning Policy Framework (NPPF). This is the test under basic condition (a).
- 1.9. Nonetheless, GSL are committed to working with CNMPC and other relevant stakeholders to design and deliver a high-quality and sympathetic development on Land North of Braces Lane. By doing so, this will help both the Parish and District Councils to deliver much needed housing as a means to tackle the current housing shortfall in Bromsgrove, but also do so in a way that delivers other significant benefits to the local area.

Site Allocations

- 2.1. As set out at paragraph 3.6 of our Regulation 14 Response earlier versions of the CNMNDP considered potential site allocations for housing development, including Land to the North of Braces Lane. However, as noted at paragraph 3.7 of our Regulation 14 Response CNMPC have now reined back from doing so. The Consultation Statement seeks to justify this on the basis that BDC have not provided any indication of a potential housing target for the Parish, stating that paragraph 135 of the NPPF requires 'exceptional circumstances' to justify alterations to Green Belt boundaries. However, paragraph 135 of the NPPF states:
- 2.2. *"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. **Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.**"* (RPS emphasis added)

- 2.3. Notably policy BDP3.1 of the adopted Bromsgrove District Plan 2011-2031 (adopted January 2017), states:

“A full Green Belt Review will be carried out and further sites will be allocated within a Local Plan Review to contribute approximately 2,300 dwellings towards the 7,000 target.”

- 2.4. This strategic policy clearly establishes the need for changes to the Green Belt which, as per paragraph 136 of the NPPF, allows for detailed amendments to the boundaries of the Green Belt to be made through non-strategic policies, including neighbourhood plans. As such RPS contend that it is within the remit of the CNMNDP to make detailed changes to Green Belt boundaries and doing so would be entirely in accordance with the positive and proactive approach to meeting housing need envisaged by the NPPF.
- 2.5. Notwithstanding the point made above should the CNMPC continue to proceed on the basis that the CNMNDP will not allocate sites RPS consider there to be no justification for the inclusion of the substantial volume of material contained within the current version on the CNMNDP on housing need, housing requirements and assessment of individual sites as set out in paragraph 3.12 of our Regulation 14 Response. While RPS recognise that this material may be of assistance to future consideration by BDC of the housing requirement for the CNMNDP area, it is not of benefit to future users of the CNMNDP in the decision making process, and becomes largely superfluous. We reiterate our suggestion that this material should be removed from the CNMNDP. It would be preferable if this material was contained instead in a separate document which could be utilised by CNMPC in future engagement with BDC as evidence on potential housing requirements for the Parish through the emerging local plan review for Bromsgrove.
- 2.6. Alternatively, in line with national planning policy guidance (PPG Paragraph: 009 Reference ID: 41-009-20190509 Revision date: 09 05 2019) as set out at paragraph 3.15 of our Regulation 14 Response CNMPC could consider identifying ‘reserve sites’ which would help to minimise potential conflicts with the emerging local plan review for Bromsgrove as and when local housing need becomes clearer. This would help to minimise potential conflicts and ensure that policies in the CNMNDP are not overridden by the new local plan. It is important to note that this approach would not prejudice any decision on the local housing need for the Parish and the potential requirement to accommodate wider housing requirements for Bromsgrove District as is suggested by the Consultation Statement, but instead would ensure that when this need is established that suitable sites have the policy backing within the CNMNDP to be brought forward in a timely manner for development.

Housing Need

- 3.1. As expressed in paragraphs 3.16 to 3.23 of our Regulation 14 Response, RPS is concerned by the approach taken in the identification of housing need as part of the wider strategy for housing, including the site assessment material. This strategy will not contribute to meeting the housing needs for the parish, and fails to meet the basic conditions linked to the contribution towards sustainable development (test 8d). The Parish will no doubt be aware that the District Council’s plan is in urgent need of review, and there are currently no clear means to address the shortfall that currently exists, in

addition to future need. To seek to identify possible allocations without understanding the full extent of this need, and a potential change to the spatial strategy would be premature, and contrary basic condition test 8e. Consequently, RPS consider that this material should be deleted from the plan in its entirety.

Policy H1

- 4.1. Criterion 1 of Policy H1 as worded seeks to prevent development on the basis of future work to be undertaken outside the NDP process. As set out in paragraphs 4.6 and 4.7 of our Regulation 14 Response this cannot be applied independently to specific proposals on sites located within the Green Belt and the criterion does not stand on its own. It also seeks to establish an additional level of protection to Green Belt land above the protection afforded by the NPPF. This is not justified, nor is it necessary.
- 4.2. CNMPC have suggested in their Consultation Statement that the proposed policy would not inhibit any developer from pursuing a proposal for major residential development in the meanwhile. However, the policy would in effect ensure that any such proposals would be contrary to the development plan if the CNMPC was adopted with the policy worded in its current format. This would inhibit such proposals from coming forwards, even if the relevant tests set out in the NPPF for development within the Green Belt could be met. No justification is provided for why Green Belt within the Parish should be accorded a greater level of protection than Green Belt elsewhere and RPS contend that such justification does not exist. As such this criterion should be deleted.
- 4.3. Criterion 2 is overly restrictive as worded as it does not allow for the redevelopment / reuse of previously developed land within the Green Belt, despite this being acceptable in certain circumstances as defined by paragraph 145 of the NPPF. While the Consultation Statement correctly notes that the CNMNDP cannot do this, that would be the effect of the current policy wording. Accordingly, RPS recommend that this is deleted.
- 4.4. RPS welcome the removal of the word 'only' from the first line of policy H1.
- 4.5. We maintain the position set out in paragraphs 4.12 to 4.14 of our Regulation 14 response (enclosed) regarding text contained in the second and third paragraphs of the reasoned justification for policy H1. In particular there is the risk that a future decision maker may interpret this text as indicating that by virtue of being part of the CNMNDP that these studies have been subject to examination. As these studies are not proposed to be tested through the examination of the CNMNDP it is recommended that this text is deleted, and the studies removed from the CNMNDP for the avoidance of doubt. They could, as suggested above be included in a separate standalone document.

Policy H2

- 5.1. RPS welcome the changes that have been made to this policy. However, the proposed revised wording continues to be overly prescriptive by requiring that schemes should provide the four criteria set out at a) to d). This would potentially preclude developments that make a contribution to some, but not all, of

these criteria and in particular is likely to introduce additional barriers to smaller developments that do not have the necessary scale to address all of these criteria within the same scheme. RPS suggest that amending the final sentence of the first section of the policy to:

“In particular, schemes that provide some or all of the following will be supported:”

Policy H3

- 6.1. RPS note that the proposed wording of this policy has been revised from the Regulation 14 version of the CNMNDP and the reference within the Consultation Statement that the Design Guide is intended to have an ‘informative role’. However, RPS are concerned that the Design Guide as drafted is not as envisaged by the planning practice guidance (Paragraph: 005 Reference ID: 26-005-20191001 Revision date: 01 10 2019) which describes local design guides as:

“concise, positive documents which are accessible and use tools such as illustrations and checklists to highlight key design issues and possible solutions.”

- 6.2. Instead the Design Guide is a particularly lengthy document, which is overly prescriptive setting various requirements for developments. As such rather than acting as a concise and positive document that highlights key design issues and presents possible solutions the Design Guide prescribes specific approaches and does not recognise that there may be appropriate alternative solutions not envisaged by the authors. In particular the language used consists primarily of ‘should’ statements which imply a firm requirement rather than ‘could’ or ‘may’ statements which recognise that an approach is recommended or encouraged, but that alternative approaches may also be appropriate. Revising the document to reflect this more flexible approach would ensure that it is more consistent with the approach set out in the planning practice guidance.

Policy ENV4

- 7.1. As set out at paragraphs 4.26 to 4.37 of our Regulation 14 Representations RPS disputes the legitimacy and credibility of the evidence provided by CNMPC for the designation of Area 2 as a Local Green Space in the CNMNDP. Despite the critique of the evidence provided including identification of a number of inconsistencies in the assessment of this area CNMPC has not sought to engage with the issues identified and instead continues to propose this area as a Local Green Space without sufficient justification and so this proposal fails the requirements of the basic conditions test 8a.
- 7.2. Furthermore, in the Consultation Statement CNMPC state that it would be unlikely to inhibit development of adjacent land because it has the potential to be incorporated into the open space / recreational area for a scheme. RPS dispute this conclusion as the designation of this land in its entirety would potentially fetter development of land to the north by preventing access from Birmingham Road as proposed in Appendix A of our Regulation 14 Representations. This would be contrary to basic condition test 8b as it would prevent sustainable development. While RPS dispute the designation of any part of this area as a Local Green Space, should it be considered that this is

justified the boundary should be revised to ensure that a suitable access from Birmingham Road can be provided and so not inhibit the development of the land to the north.

Site Assessment Process and Studies

- 7.3. RPS notes that the Consultation Statement responds to the various criticisms of the site assessment process and the two studies raised in section 5 of our Regulation 14 Response. Notably CNMPC have acknowledged that some of these criticisms are correct, for example that the Land North of Braces Lane is available for development. However, despite this the studies have not been updated accordingly and there is no indication that CNMPC intend to do so. Given that no sites are proposed to be allocated for development through the CNMNDP the inaccuracies in these evidence base documents is less of a concern with regards to the preparation of the CNMNDP. Notwithstanding this point the fact that inaccuracies have been identified is further reason why these documents should not be appended to the CNMNDP as is currently proposed.
- 7.4. It should also be noted that RPS does not agree with a number of the responses from CNMPC to the points raised in our Regulation 14 Response. Given that CNMPC are not currently proposing to allocate any sites through the CNMNDP we have not addressed these matters in detail in this letter. However, we suggest that should a change in approach be decided upon in the future, such as for instance the identification of reserve sites as proposed at paragraph 2.6 above, that it will be necessary to undertake further consultation on an updated and revised site assessment to inform such a process.

Conclusions

- 8.1. RPS is grateful for the opportunity to comment on the CNMNDP and would like to express our support for neighbourhood planning. We do however have a number of significant concerns relating to the ability of the CNMNDP to meet those basic conditions required by the Town and Country Planning Act.
- 8.2. With regards to Site Allocations, RPS do not agree that the CNMNDP cannot make detailed amendments to the Green Belt however if this approach is taken then the material relating to potential site allocations should be omitted from the CNMNDP. Alternatively consideration should be given to the identification of reserve sites as encouraged by the national planning practice guidance, which would act to 'future proof' the CNMNDP to a greater extent than having no allocations.
- 8.3. RPS is concerned by the approach taken in the identification of housing need as part of the wider strategy for housing, including the site assessment material. This strategy will not contribute to meeting the housing needs for the parish, and fails to meet the basic conditions linked to the contribution towards sustainable development (test 8d). To seek to identify possible allocations without understanding the full extent of this need, and a potential change to the spatial strategy would be premature, and contrary to basic condition test 8e. Consequently, RPS consider that this material should be deleted from the plan in its entirety.
- 8.4. Amendments are suggested to policies H1 and H2 to ensure that they are consistent with national policies and advice contained in guidance issued by the Secretary of State to ensure that the CNMNDP

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meets the basic condition text 8a. Revisions are also suggested to policy H3 and the associated Design Guide for the same reason.

- 8.5. RPS contend that insufficient justification has been provided for the proposed designation of area 2 as a Local Green Space and so to do so would fail basic condition test 8a. RPS also note that the current proposed boundary would prevent the development of the land to the north of this area which would be contrary to basic condition test 8b as it would prevent sustainable development.
- 8.6. While this letter has not repeated in detail our concerns with the assessment of sites in the CNMNDP evidence base as the CNMNDP is currently not seeking to allocate sites, we maintain many of these concerns as set out in our Regulation 14 Response. Given that it appears unlikely that CNMPC will update this evidence, even where our concerns have been accepted, we request that this evidence is not appended to the CNMNDP as to doing so would be in breach of paragraph 16 d) of the NPPF which requires that plans should:

“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”

- 8.7. Supported by technical evidence, RPS considers that Site 12 (Braces Lane) is a suitable and deliverable site, and represents one of the strongest land parcels when considering removing land from the Green Belt. RPS will continue to promote the site through the emerging review of the Bromsgrove Local Plan, which is considered the most appropriate vehicle to deliver the scale of growth that the Parish needs. RPS welcomes further engagement with the Parish through the development of this document and trusts that the evidence previously provided in our Regulation 14 Response will assist in the support of this promotion.

Yours sincerely,
for RPS Consulting Services Ltd



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LAND NORTH OF BRACES LANE: CATSHILL AND NORTH MARLBROOK NDP REPRESENTATIONS

Representations on behalf of Gleeson Strategic Land

JBB8317-C7417
Land north of Braces Lane:
Catshill & North Marlbrook
NDP (Regulation 14)
1
November 2020

Quality Management

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1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd (RPS) is instructed by Gleeson Strategic Land (GSL) to represent their interests in relation to the Catshill & North Marlbrook Neighbourhood Development Plan (CNMNDP) and to formally respond to the Regulation 14 Pre-Submission Consultation being consulted on by Catshill & North Marlbrook Parish Council (CNMPC). The latest consultation runs until 2nd November 2020. RPS has formally responded to previous rounds of consultation on the CNMNDP, this being the response to Catshill and North Marlbrook Neighbourhood Plan Consultation June 2018, letter dated 31st July 2019 (for information, the site of interest here was previously referred to as 'Land East of Birmingham Road', but is referred to here as 'Land North of Braces Lane' or simply here as 'the site').
- 1.2 Following this stage, the CNMNDP will be updated and then formally submitted to Bromsgrove District Council ('BDC') as the Regulation 15 (Submission version) of the plan.
- 1.3 GSL supports CNMPC in progressing the CNMNDP and RPS has held meetings with the Parish Steering Group (in January 2019) on the site on behalf of GSL.
- 1.4 Chapter 2 of this document provides details of the site as part of the supporting evidence showing the overall suitability and deliverability of the site. This demonstrates that the site can be brought forward as soon as required, and so is capable of meeting the housing shortfall for the District in a sustainable manner. This is set out in the further detail in the Vision Document included as Appendix A to these representations.
- 1.5 Despite supporting the principle of preparing an NDP for Catshill & North Marlbrook Parish area GSL has concerns with various policies and other related aspects of the published documents. This is set out in more detail in Chapter 3, 4 and 5 of this document.
- 1.6 RPS must express our concerns in respect of various aspects of this consultation version of the CNMNDP. These concerns are that aspects of the CNMNDP do not meet the 'basic conditions' as set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).
- 1.7 In particular, RPS consider the CNMNDP does not meet the following:
- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
 - (d) the making of the order contributes to the achievement of sustainable development,

- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

1.8 We are concerned that the MNDP does not meet relevant aspects of policy within the National Planning Policy Framework. This is the test under basic condition (a).

1.9 Nonetheless, GSL are committed to working with the Parish Council and other relevant stakeholders to design and deliver a high-quality and sympathetic development on Land North of Braces Lane. By doing so, this will help both the Parish and District Councils to deliver much needed housing as a means to tackle the current housing shortfall in Bromsgrove, but also do so in a way that delivers other significant benefits to the local area.

2 LAND NORTH OF BRACES LANE, CATSHILL, BROMSGROVE

Introduction

- 2.1 Catshill and Marlbrook is a thriving settlement within Bromsgrove District that is ideally placed to deliver future housing growth. It is a sustainable location that is well served by public transport and a variety of services that are required to support the needs of future residents. Marlbrook has the capacity to contribute towards the shortfalls of housing provision in the District.
- 2.2 The Land east of Birmingham Road (otherwise referred to as ‘Land north of Braces Lane’) provides an ideal opportunity to create a sustainable, distinctive and attractive residential community to help with meeting future housing needs.
- 2.3 The land is under the control of Gleeson Strategic Land Ltd (GSL), a national and respected developer who is committed to working with Bromsgrove District Council and the local community, as it has done elsewhere within Worcestershire, to design a high-quality and sympathetic development which delivers social, environmental and economic benefits for the area.

Site and Surroundings

- 2.4 The site comprises 7.4ha of agricultural fields approximately four kilometres north of Bromsgrove town centre. The site is contained by housing to the west, south and southeast, with agricultural land to the north and northeast. Access would be off Birmingham Road (A38) to the west.
- 2.5 There is a network of Public Rights of Way (PROWs) in the vicinity of the site that provides connectivity to the surrounding area such as Birmingham Road, Alvechurch Highway, Cottage Lane, Green Lane, Woodrow Lane and Golden Cross Lane.
- 2.6 In terms of constraints, the site (reference BDC210) was assessed within Bromsgrove District Council’s 2015 Strategic Housing Land Availability Assessment (SHLAA), and was listed as ‘Green Belt Potential’ site. The site scored well under Stage A and under the Stage B both sites were not considered unsuitable in any category with the only significant constraint being the Green Belt.
- 2.7 Therefore, the development of the site represents a logical option for further housing growth of Catshill and Marlbrook.

Green Belt

- 2.8 The extent of Green Belt identified at Catshill and Marlbrook NDP area, and across Bromsgrove more widely, is and will continue to be a critical aspect in the future planning of development in the District.
- 2.9 It is accepted that the development of the site will have limited impact on the setting of the area and will not compromise the five purposes of Green Belt. The site is well contained with defensible and durable boundaries and will have an inconsequential impact upon encroachment into the countryside. It will in no way result in the merging of settlements and will not prejudice urban regeneration elsewhere in the District. As such, the site represents an appropriate Green Belt release to contribute towards housing need in the form of a sustainable development within Catshill and Marlbrook Parish.

A Sustainable Location for Future Growth

- 2.10 The parish of Catshill and Marlbrook has a population of 8551 (at last Census count in 2011) and is identified as a “Large Settlement” in the Bromsgrove District Local Plan.
- 2.11 The parish benefits from excellent connectivity owing to access to Junction 4 of the M5 Motorway to the north of the settlement and Junction 1 of the M42 to the south. The A38 runs through Catshill and Marlbrook that is served by a bus route between Birmingham and Bromsgrove.
- 2.12 In particular, the 144 bus service operates between Birmingham and Worcester and passes through the area every 30 minutes, with bus stops for this service within easy walking distance of the site. Other services in the vicinity of the site include the 44 bus service, which runs between Bromsgrove and Halesowen.

Technical Supporting Evidence

- 2.13 A range of technical assessments have been prepared in support of the site, which demonstrate that the site is capable of delivering a well-designed, sustainable and deliverable development in this part of Catshill and Marlbrook. These include:
- Topographical Survey;
 - Utility Assessments;
 - Landscape and Visual overview;
 - Ecology Appraisal;
 - Transport capacity work; and

- Highway access design and pre-application with Worcestershire County Council.

2.14 Careful design of the layout will ensure that any potential impacts are minimised to ensure the development will be appropriate to its location and setting, informed by the technical supporting assessment highlighted above.

Development Vision

2.15 The site is in a strategic location with excellent connectivity to the M5 and M42, as well as being well served by public transport. There are public rights of way within the vicinity of the site which provide opportunities to explore the wider area on foot and there are local services in close proximity.

2.16 The illustrative masterplan below shows how a development could come forward on the site, taking into account local landforms and infrastructure, which could include:

- net development area is 4ha and it is expected that the site can deliver around 125 dwellings;
- provision of a range of house types creating a varied and interesting townscape that would be of high-quality design, responding effectively to the context of different parts of the site;
- provision for up to 40% affordable housing to address local need;
- provision of open greenspace on the southern part of the site where an attenuation pond would be sited, if required, for sustainable drainage. The greenspace would maintain the openness to the brook and encourage flora or fauna to benefit from this watercourse;
- provision of additional greenspaces at the eastern end of the site adjacent to the agricultural fields to soften the boundaries of the development. This will relate well to where the area opens up to the northeast of the site, and would also allow continued access to the network of PROWs in the vicinity of the site;
- provision of a public footpath to an existing children's area of play on Braces Lane.

2.17 The layout of the scheme would comprise a linear arrangement adjacent to the properties along the A38, with a more varied layout to the centre of the site that more closely reflects the pattern of development of the housing estate to the southeast.

2.18 In response to the landscape and visual baseline analysis, a series of landscape objectives, and opportunities and constraints have been identified to ensure that the development

response reflects the local circumstance and addresses the key sensitivities present on the site. These are reflected in the landscape framework plan, and include:

- Development should be offset from the northern boundary of the site to respect the character of the wooded knoll to the north and avoid development occupying the rising ground associated with it;
- The retention and enhancement of the existing field boundary hedgerows will provide robust defensible edges to the eastern and northern edges of the site which would become the new settlement edge and green belt boundary;
- Retention of an area of open space to the east of the site would reinforce the defensibility and permanence of the new green belt boundary, as well as provide new opportunities for public open space provision in the form of a naturalistic country park. It could also be connected to the wider public rights of way by linking up to the public footpath to the immediate east of the site;
- It will be important to ensure development towards the south of the development area on site appears consistent with the existing residential context adjacent in views of the site from the south; and
- Retention of a development offset in conjunction with Marl Brook will provide an opportunity to create a linear area of natural open space connected to nearby footpath routes.

A Deliverable Development

- 2.19 As stated above, the site is being promoted by Gleeson Strategic Land (GSL), a strategic land promoter who are committed to delivering a sustainable residential community on the site at the earliest opportunity following an appropriate allocation. There are no legal or ownership impediments which would prevent the land from being delivered for residential development. The site is, therefore, available now.
- 2.20 The site was assessed within the 2015 Bromsgrove District SHLAA (BDC210) and scored well against its accessibility to local services and facilities, further highlighting its sustainability credentials. It is also worth noting that Marlbrook, as part of Catshill Parish, is already recognised as a “Large Settlement” within the District Plan’s settlement hierarchy.
- 2.21 Furthermore, there are no significant constraints on site and no identified issues that would prevent development from occurring. National planning policy states that sites are achievable where they are viable and there is a reasonable prospect of housing delivery

within five years. It includes a judgment about the capacity of a developer to complete the development within a certain period.

- 2.22 The site has the potential to deliver a significant number of much-needed housing stock in the short and medium term in a sustainable location; by a leading land promoter that is ready to deliver the development swiftly because the proposed development is viable. As such, the site is achievable.
- 2.23 It can therefore be concluded that the site is available, suitable and achievable and, therefore, deliverable.
- 2.24 More details in relation to the vision and objectives for the site are set out in the Vision Document in Appendix A.

3 CATSHILL & NORTH MARLBROOK NDP (REG 14)

Changing Approach to Site Allocations

- 3.1 At a very early point in the Regulation 14 NDP (CNMNDP) it is recognised that policies in the NDP must be consistent with particular reference to the current development plan and the National Planning Policy Framework (NPPF 2019). In Bromsgrove, the development plan currently comprises the Bromsgrove Local Plan, adopted in January 2017 (paragraph 2.1 refers).
- 3.2 The CNMNDP also recognises that the development plan provides the strategic direction for new development in the District, including the overall quantum and distribution of growth to be planned for in Bromsgrove (paragraph 2.2 refers). Of greater significance is the recognition in the CNMNDP of the constraints that the District faces in meeting its housing requirement (c. 7,000 dwellings up to 2030) due to 90% of the District being designated as part of the West Midlands Green Belt.
- 3.3 This level of constraint on the distribution of growth to meet the District's housing requirement is further exacerbated due to the tightly drawn inner boundaries of the Green Belt that exist around the various settlements in Bromsgrove, including at Catshill. The CNMNDP reflects on this, stating:
- “Unfortunately, the tightly drawn Green Belt boundaries are now a major constraint because there are insufficient sites in urban areas or ones which have previously been used (‘brownfield sites’) to meet future needs. To enable the District Council to satisfy its remaining housing targets a study of the area covered by the green belt is being undertaken as part of District Council’s revisions to its Local Plan”* (paragraph 2.3 refers).
- 3.4 Reference is then made to the necessity for a review of the existing Green Belt as part of the future local plan review¹ to ensure that sufficient land can be identified and allocated via a local plan review to ensure that the remaining 2,300 dwellings can be delivered and additional sites then allocated in the plan.
- 3.5 The CNMNDP recognises that Catshill is one of six identified ‘large’ settlements where the District Council is likely to direct further housing growth to be delivered after 2023 as there are perceived to be fewer opportunities to accommodate this at Bromsgrove town

¹ Bromsgrove Local Plan, paragraph 8.15

(paragraph 2.4 refers). This will require, the NDP states, the identification and use of land currently in the Green Belt as this is the only source left which is capable of providing the amount of housing needed elsewhere in the District including this [Catshill & North Marlbrook] Parish. Similarly, the CNMNDP recognises that, through the adoption of a NP, it is possible for the local community to have a more significant input into the planning process by influencing where further housing might go and setting out how other matters should be addressed (paragraph 2.6 refers, emphasis added).

3.6 Consequently, on the basis of the commentary from the CNMNDP summarised above, RPS suggest that there is a clear case for the allocation of additional land at Catshill settlement and that this should form part of the development strategy for the CNMNDP area. In fact, this has been assumed as being the case based on previous rounds of consultation on the CNMNDP that had considered potential site allocations, in particular for housing development, including Land to the North of Braces Lane.

3.7 Unfortunately, CNMPC appears to have reined back at the point of publishing a formal consultation version of the CNMNDP on proposing specific allocations. This is assumed to be due to the District Council's inability or reluctance (or both) to provide the Parish with an 'indicative housing figure' which CNMPC had requested previously. In this regard, the CNMNDP states:

“However, BDC has not set a precise housing target for the Parish to Accommodate or an indicative housing figure which has been requested by the Parish Council and is a requirement under paragraph 66 of the NPPF. It is however undertaking a number of studies (see para. 1.7) to provide the evidence to support a future strategy” (paragraph 2.7 refers).

3.8 It appears therefore that CNMPC has decided not to allocate any specific housing sites in the CNMNDP because the District has not provided it with either a housing requirement for Catshill or an indicative housing figure, and that to do so would be in contravention of national policy.

3.9 However, far from being a requirement, paragraph 66 of the NPPF does not preclude or prevent any Neighbourhood Planning Area or Forum from identifying additional land for development out with a specific housing figure at the parish level, simply that the NDP must be in general conformity with the development plan. Furthermore, paragraph 136 of the NPPF allows changes to be brought forward through NDPs as part of the non-strategic policies, including detailed amendments to Green Belt boundaries, where the need for such changes has been established through strategic policies. As established above, and recognised in the CNMNDP itself, there is a clear need for amendments to be made to the

boundaries of the Green Belt in Bromsgrove. Without this, the District will not meet the needs of its residents and the development plan will have thus failed to deliver what is expected of it.

- 3.10 On this basis, it is therefore unclear as to the reasoning for why CNMPC has decided, at a relatively late stage in the plan-making process, not to allocate any sites for residential development despite the clear and overwhelming case for additional land to be allocated in the CNMNDP.
- 3.11 The confusion and lack of clarity is further exacerbated because the CNMNDP contains reference to a considerable amount of evidence prepared in relation to local housing need and individual site assessment work for the NDP area, undertaken by CNMPC and via external consultants commissioned to undertake specific pieces of work (AECOM). Whilst a considerable amount of effort has clearly gone into the evidence base underpinning the housing strategy of the CNMNDP, it has no place in a plan that does not allocate any land for housing development.
- 3.12 Without any proposed site allocations for residential development in the CNMNDP there is no need to include any commentary relating to housing need or site options. Therefore, for the purposes of providing the necessary clarity of approach, RPS suggests that all the material included in the CNMNDP Regulation 14 version that relates to the housing need figure, housing requirements and assessment of individual sites should be removed prior to publication of the Pre-Submission (Regulation 15) version of the CNMNDP.
- 3.13 RPS also suggests that it would be sufficient merely to state in the CNMNDP that a decision has been made not to allocate specific sites and give clear and concise reasons for taking this course of action. This is particularly important given that previous rounds of consultations had considered in some detail the range of site proposals, in no small part due to engagement and other work carried out by landowners and developers with interests in the parish/District.
- 3.14 By doing this, the issue of how to address future housing need would then be more appropriately addressed as part of the emerging local plan review for Bromsgrove instead, based on up to date evidence prepared to inform that process, including the Green Belt Review.

3.15 Alternatively, in line with national planning policy guidance², CNMPC could consider identifying 'reserve' sites to ensure that the emerging evidence of local housing need is addressed once the District Council has progressed the local plan review to the point where local housing need becomes clearer. This has been done in neighbouring districts, for example across numerous NDP areas within Stratford-on-Avon. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by the new local plan, thus 'future-proofing' the CNMNDP to a greater extent than if having no allocations.

Housing Need - considerations

3.16 RPS notes that CNMPC has undertaken various studies looking to quantify an indicative housing figure of its own. This is in response to the lack of any figure being supplied by BDC at this time, though RPS notes that BDC does intend on providing a housing figure for the parish as part of the local plan review.

3.17 The evidence published by CNMPC has been prepared on its behalf by AECOM, and is set out in the evidence base documentation issued for consultation, titled 'Catshill and North Marlbrook Housing Needs Assessment' (HNA) (Appendix 8 refers). According to the analysis, the HNA recommends an overall housing need figure (HNF) of 399 dwellings, equating to 21 (rounded) dwellings per year between 2011 and 2030, and a residual HNF of 257 dwellings, equating to 23 (rounded) dwellings per year for the remainder of the Plan period (up to 2030), when accounting for 142 dwellings completed in the parish since 2011. Projecting this average forward to 2040 (to align with the likely local plan review plan period end date) means an additional 230 houses would be required.

3.18 However, the total figure of 399 dwellings is significantly lower than the figure of 532 dwellings calculated based on the proportion of the total district population living in Catshill and North Marlbrook in 2011 (7.3%)³. This is due to the application of a 'sustainability score' based on the number of sustainability points Catshill and Marlbrook were allotted in the Bromsgrove District Plan Settlement Hierarchy Background Paper ranking of the settlement. RPS does not agree with this approach for the following reasons.

3.19 Firstly, it was not the stated purpose of the adopted Local Plan to rank the six settlements identified under Policy BDP2.1. Each settlement is therefore identified equally with the

² PPG Paragraph: 009 Reference ID: 41-009-20190509 Revision date: 09 05 2019

³ 6,538 out of 93,637 people at Census 2011 equates to 7.3%. 7.3% of the annual District Local Housing Need figure (390) is 28. The overall plan period (2011-2030) is 19 years. Therefore, 28 times 19 equals 532.

other and so does not rank the settlements in the development plan. RPS therefore considers that the use of sustainability scoring goes well beyond the requirement to take into consideration relevant policies such as an existing or emerging spatial strategy. Consequently, the use of a background paper in this way is considered to be wholly arbitrary and unnecessary and seek to reduce or restrict the contribution that Catshill and North Marlbrook NDP can and should make towards addressing the adopted housing shortfall in Bromsgrove.

3.20 Secondly, the approach does not take sufficient account of the relative lack of housing land supply at Catshill and North Marlbrook Parish, as shown in the table below, taken from the latest annual monitoring data published by the District Council issued in 2018.

Table 4: Distribution of housing land supply with planning permission (Gross)

Parish/Area	No of dwellings	% of supply	Parish/Area	No of dwellings	% of supply
Alvechurch	20	4.2%	Finstall	0	0%
Barnt Green	4	0.9%	Frankley	0	0%
Belbroughton	22	4.6%	Hagley	25	5.3%
Bentley Paucefoot	6	1.2%	Hunnington	0	0%
Beoley	5	1.3%	Lickey and Blackwell	20	4.2%
Bournheath	1	0.2%	Romsley	3	0.6%
Bromsgrove Town	117	24.8%	Rubery	3	0.6%
Catshill and North Marlbrook	10	2.1%	Stoke	203	43.1%
Clent	2	0.4%	Tutnall and Cobley	1	0.2%
Cofton Hackett	0	0%	Wythall	24	5.1%
Dodford with Grafton	4	0.9%	Total	470	100%

3.21 The data above indicates that only 2.1% of the total land supply is located within Catshill and North Marlbrook parish, with only Rubery and Barnt Green having a lower proportion amongst the six named settlements.

3.22 And thirdly, the housing requirement set out in the CNMNDP is likely to be superseded by a higher figure the District Council publishes its emerging local plan review. This is because any updated local housing need figure is likely to be informed by a revised standard method formula. An initial assessment of the likely need based on the Government’s approach in the consultation document⁴ suggests that the housing need for Bromsgrove as a whole could increase to 694 dwellings per annum, up from 390 dwellings per annum

⁴ Changes to the Planning System, August 2020

based on the current standard method calculation in the HNA (paragraph 90 refers). Consequently, it is very likely that due to the substantial increase in the overall local housing need for Bromsgrove, this will result in the CNMNDP indicative figure of 399 dwellings will soon become obsolete, with a much greater share likely to be directed to Catshill and North Marlbrook.

- 3.23 On this basis, RPS suggest that this provides further evidence that the inclusion of material relating to local housing need and the indicative housing requirement is ill-conceived and should be removed, with matters relating to the appropriateness of the housing requirement being left to the local plan review to consider.

4 REPRESENTATIONS ON THE NDP POLICIES

- 4.1 RPS notes that the first policy, Policy H1, in the CNMNDP doesn't appear until page 48 of the Regulation 14 document (in Section 3 – Neighbourhood Plan Policies). RPS further notes that the preamble to Policy H1 under the Housing and Infrastructure sub-section (excluding the reasoned justification) runs to some 18 pages.
- 4.2 Whilst much of the commentary seeks to summarise the evidence base gathered by CNMPC on a range of topics (i.e. housing mix, highways and design quality) a significant proportion of it focuses on the matters relating to overall housing need, the indicative housing figure, and housing site assessments and the evidence gathered on these matters. As highlighted in the previous chapter, however, the CNMNDP does not select an indicative housing figure nor does it allocate any residential sites to meet the figure.
- 4.3 Consequently, it remains unclear why the CNMNDP has gone to such lengths to detail the evidential basis for an indicative housing figure and consideration of a range of site options to deliver it within the plan itself, and then proceeds not to propose a figure nor allocate any sites at this stage.
- 4.4 RPS addresses issues raised by the approach to site assessment in Chapter 5 of this submission.

Housing and Infrastructure

Policy H1 Ensure sufficient new housing is provided

- 4.5 Policy H1 identifies a number of criteria to be applied to major new residential development proposals (sites of 10 or more dwellings) brought forward in the area. The first section of the policy states:

“Major new residential development of ten or more dwellings will only be acceptable on sites that meet at least one of the following criteria:

- 1. The site is released from the Green Belt as part of the Green Belt and District Plan Review by Bromsgrove District Council; or,*
- 2. The site involves the redevelopment/reuse of previously developed land within the existing (i.e. non-green belt) urban areas of the Parish;*

- 4.6 RPS objects to these criteria, as drafted. Criterion 1 seeks to prevent development on the basis of future work to be undertaken outside the NDP process, namely the review of the Green Belt (GBR) required to inform the Bromsgrove Local Plan review. On the basis, the criterion relies on actions outside the NDP process and thus cannot be applied independently to specific proposals on site located in the Green Belt. The criterion thus

does not stand on its own. Furthermore, the application of the criterion is only possible once a GBR has been prepared and tested through the Bromsgrove local plan review. This is unlikely to have happened at the point at which the CNMNDP will have passed through examination (the point at which weight can be applied to the NDP in determining planning applications) or, potentially, when the CNMNDP is 'made' (most likely to be May 2021).

4.7 This criterion therefore seeks to establish that all Green Belt land cannot be built on until such time as the District Council has completed a review of the Green Belt and land is released from the local plan review process. The CNMPC seeks to elevate the CNMNDP beyond its intended purpose by seeking to prevent development required through other means brought forward separate to it.

4.8 Consequently, for these reasons, criterion 1 should be deleted.

4.9 Criterion 2 states that major development will only be acceptable on non-Green Belt sites within the existing urban areas of the parish. RPS objects to this wording as it is overly prescriptive and restrictive and does not accord with national policy. The NPPF 2019 (paragraph 145 and 146) identifies those circumstances where development in the Green Belt can be justified.

4.10 Additionally, in line with the objections above, RPS also suggest that the word 'only' should be deleted from the first line of Policy H1 as this is overly restrictive and could arguably be seeking to protect sites for their own sake, rather than promoting the achievement of sustainable development as required by national policy.

4.11 Consequently, criterion 2 as drafted should be deleted or amended accordingly.

4.12 RPS also objects to parts of the reasoned justification under Policy H1, in particular the following:

"In the absence of a precise or indicative figure for the housing need a number of studies have been undertaken for the NP. These have sought to identify the possible scale of future housing, local housing needs and the least damaging locations where development will have minimal long-term impact, both on the Green Belt and the local community.

This work has led to a number of factors being identified which should be taken into account in either the allocation of sites (by Bromsgrove District Council) or in response to planning applications. Detailed information on the studies informing these criteria can be found in the appendices (3, 4, 7, 8, 9 and 11). It is intended that this information informs the District Council's review of the Bromsgrove District Plan and assists in

determining the scale of development, the number and size of sites and housing needs in the Parish.” (CNMNDP, Regulation 14, p49)

- 4.13 Consistent with other representations set out in this submission, given that the CNMNDP does not propose any indicative housing figure or allocate any sites, references to the likely future housing needs of the District and any potential housing figure for the CNMNDP area is a matter more appropriately left to the emerging local plan review process. Thus, there is no place for this in a neighbourhood plan that does seek address the current housing shortfall acknowledged in the strategic policies of the development plan.
- 4.14 Consequently, the wording quoted above should be deleted from the CNMNDP.

Policy H2 Provide housing which meets the needs of local residents

- 4.15 Policy H2 seeks to ensure that a mix of housing types, tenure and size is provided. The policy is underpinned by evidence prepared by AECOM which looked at the housing need of specific groups (see Appendix 8 to the CNMNDP).
- 4.16 RPS does not object to the inclusion of such a policy in principle. However, only the first and last sentences appear to be drafted as criteria that could be applied to new residential development. Similarly, there is a danger that the criteria, as drafted, could be applied in an overly mechanistic or prescriptive manner that focuses solely on deficiencies rather than acknowledging the contribution that new residential development can make to the wider needs of the District.
- 4.17 For example, the provision of single-tenure development may, in response to local circumstances, be appropriate and wholly accord with the strategic policies of the development where issues such as viability might impact or threaten the deliverability of schemes that might otherwise seek to deliver a greater mix of accommodation.
- 4.18 Consequently, RPS suggests that the word ‘...required...’ should be deleted from the first sentence of the policy and replaced with ‘supported’ or ‘encouraged’ thus building in appropriate measure of flexibility into the policy.

Policy H3 Ensure the design of new development is compatible with the character of the Parish

- 4.19 Policy H3 seeks to encourage the provision of appropriately designed development in the CNMNDP area. In doing so, the policy makes reference to the need for development to be “...consistent with the principles established in the Design Guide study...”
- 4.20 RPS considers that the CNMNDP is seeking to elevate the status of the design guide beyond merely a material consideration to that of policy. This is clearly inappropriate and is contrary to national policy and guidance, which seek to prevent the inclusion of detailed,

supplementary guidance within development plan policies. Planning Practice Guidance states that:

“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development. (PPG Paragraph: 008 Reference ID: 61-008-20190315 Revision date: 15 03 2019)

4.21 On this basis, RPS suggests the reference to the Design Guide study should be deleted from Policy H3.

Environment

Policy ENV4 Local Green Space

4.22 Policy ENV4 seeks to designate six new areas of land as Local Green Spaces (LGS) within the CNMNDP area. One of these parcels of land is defined as ‘Natural area immediately north of Braces Lane Sports Ground, Marlbrook’ (LGS Area 2); see map extract below, shading light green. Under this policy, development that would detract from the openness or special character of a Local Green Space would not be supported unless a proposal can demonstrate that the contribution of the scheme would outweigh the harm to the Local Green Space.

4.23 The policy is supported by a separate evidence base document, titled *Local Green Spaces/Formal Open Spaces Study July 2020* (see Appendix 12 to the CNMNDP).



4.24 The NPPF allows local communities to identify and designate land as Local Green Spaces, under paragraphs 99 to 101. For reference, the full wording is reproduced below:

99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of

sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

100. The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

- 4.25 Therefore, the designation of such sites needs to be clearly justified and underpinned by robust evidence base, as required by NPPF paragraph 31. In particular, any site designated as LGS must meet the policy tests set out in paragraph 100 (a-c).

RPS response to July 2020 Study

- 4.26 The evidence for the designation of LGS Area 2 begins at paragraph 3.3 of the July 2020 LGS Study. RPS does not disagree with the findings in relation to criteria a) and c) under paragraph 100. However, RPS does object to the proposed designation of this site as LGS based on the findings in respect to criteria b).
- 4.27 On page 15 of the July 2020 LGS Study, the document sets out a summary table of various attributes (or ‘features’) assigned to the site. The study scores each feature as ‘high’, ‘medium’, or ‘low’, however there is no supporting methodology or explanation as to why each feature is scored as it is. For example, LGS Area 2 is scored ‘high’ as ‘Unmanaged Greenspace’. The connotation here is that this term ‘Greenspace’ assumes the site is wholly accessible to the public. However, the site is private land and thus not currently accessible by permission of the landowner. On this basis, RPS would score the site as ‘low’, rather than ‘high’. Consequently, the ‘Designation Status’ of the site is also incorrectly defined as ‘Public Playing Field’, and should be deleted and redefined as ‘private land’.
- 4.28 It is further noted that a Public Right of Way runs along the southern boundary of the site. However, this is not accessible directly to/from the site, as it runs to the south of Marl Brook and is only accessible from Birmingham Road and Cottage Lane⁵. On this basis, the score of ‘high’ against ‘PROW – Green Corridor’ is incorrect and should be revised to ‘Low’. As evidence to this point, photographs for the agricultural access point are included below.

5



- 4.29 Under ‘Other’ feature, LGS Area 2 is marked as ‘Wildlife Corridor and natural habitat area’, and which is described as forming an ‘...important wildlife and green infrastructure corridor’. However, this finding is not supported by any evidence to substantiate the biodiversity interest or value of the site.
- 4.30 A landscape and visual overview of the site has been undertaken by Tyler Grange (Appendix G) and it has confirmed that the LGS is not visible from any public locations, with it being screened visually by the dense riparian vegetation along the southern site boundary and Marl Brook. The landscape and visual overview has also confirmed that the LGS is not particularly characteristic in terms of its landscape features, consisting of rough marshy low-lying grassland, which is not rare, or notable, and is not fundamental to defining the character of the wider Enclosed Commons Landscape Character Type, nor does it contribute to the character of the more locally identified Local Landscape Character Area 1 of the CNMPC Landscape and Visual Sensitivity Capacity Assessment. Its habitat features and proximity to Marl Brook could prove worthwhile retaining as an area of open space for ecological reasons, but in terms of the purposes of a LGS designation, the tract of grassland in question does not provide any local landscape or visual significance, is not visible from anywhere other than private views from nearby residential properties, does not provide any recreational benefits as it is not accessible, and any perceived tranquillity is restricted by its proximity to the surrounding settlement edge.
- 4.31 Based on this foregoing analysis, RPS disputes that the findings against a number of features in the July 2020 study, which thus brings into question the claim that the site represents an ‘exemplar’ of the ‘distinctive character and environment of the parish’ (paragraph 3.3 refers).
- 4.32 Under the section headed ‘Assessment Approach’, the July 2020 study considers further how ‘demonstrably special to the local community’ each of the site is, including LGS Area 2. The findings are, in fact, based wholly on a survey questionnaire put to local residents designed to gauge the level of support for the proposed LGSs. This survey elicited a number of responses (121 in total) which were then used to ascertain and determine how demonstrably special each site was in the view of residents and CNMPC.

4.33 However, RPS notes that the approach makes no reference to any additional primary technical studies or evidence drawn from secondary sources on any of the criteria set out in paragraph 11b) of the NPPF. Therefore, CNMPC rely entirely on the opinions of individual people in response to specific question they have posed to them which, whilst acknowledged, does not in our view constitute a robust evidence base to justify that LGS Area 2 meets the policy test in paragraph 100(b).

4.34 Indeed, it is illuminating that the primary reason for undertaking the exercise of designating areas of LGS in the CNMNDP would appear to be, as stated in the conclusions of the July 2020 study (paragraph 6.1 refers) in response to local concerns that ‘these spaces’ (and presumably no others) could be under threat from future housing development and therefore the CNMNDP should provide additional protection through an appropriate planning policy identifying the specific sites that should be protected.

4.35 As stated in planning guidance,

“How does Local Green Space designation relate to development?”

Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.

Paragraph: 007 Reference ID: 37-007-20140306

Revision date: 06 03 2014” (emphasis added)

4.36 On this basis, it is questionable what the actual motives are for progressing the CNMNDP with LGSs identified based on the concluding remarks in the study.

4.37 Consequently, for the reasons set out above, RPS disputes the legitimacy and credibility of the evidence which provides no justification for the designation of LGS Area 2 as a Local Green Space in the CNMNDP.

5 REPRESENTATIONS ON THE SITE ASSESSMENT PROCESS

Site Assessment - General Observations

5.1 It is noted that a considerable amount of work has been undertaken by CNMPC which has gone to some lengths to consider potential locations for where housing growth in the parish could be directed. This has resulted in the publication of three separate evidence base documents in support of the CNMNDP ‘no-allocation’ approach. These are:

- ‘Housing Site Assessment by the Neighbourhood Plan Housing Group’ for CNMPC (‘HSA’) 2017/18 (Appendix 7 to the CNMNDP);
- ‘Site Options and Assessment’ (‘AECOM sites study’) dated December 2019 (Appendix 9 to the CNMNDP); &
- ‘Comparison of Site Assessment Studies’ carried out by CNMPC 2020 (Appendix 10 to the CNMNDP)

5.2 CNMPC also undertook a call for sites exercise in 2018, to which RPS responded on behalf of GSL in respect of Land North of Braces Lane, Catshill, details of which are set out in Appendix 6 to the CNMNDP. Below are two plan extracts which illustrate the boundaries of the 25 sites considered by CNMPC as set out at Figure 4 of the CNMNDP, and the location of site 12 highlighted as set out in figure 2 of Appendix 7 to the CNMNDP.

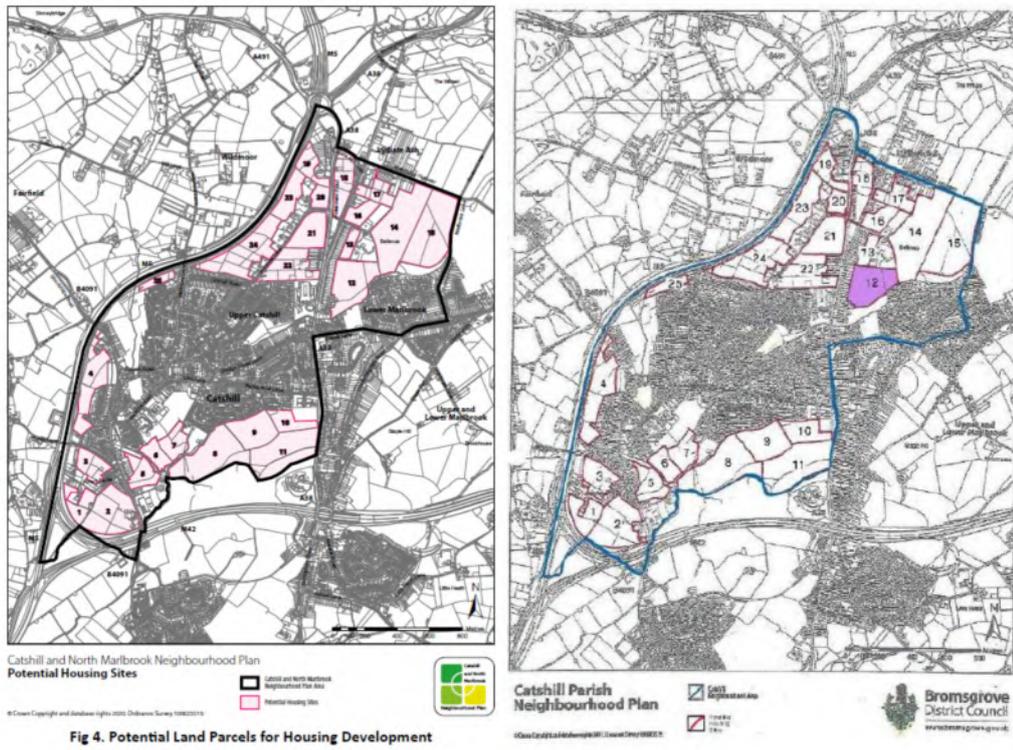


Fig 4. Potential Land Parcels for Housing Development

- 5.3 The Housing Site Assessment (HSA) process initially identified 7 of the 25 sites as being potentially suitable for residential development; these being sites 3, 5, 16, 18, 21, 22, and 24 (paragraph 6.9 of the CNMNDP refers). Further consideration reduced this to six sites; these being sites 4, 21, 22, 23, 24, and 25 (Figure 6, p36 of the CNMNDP refers). However, it is not clear what process has been followed to get from seven to six sites, given that new sites appear to have been inserted where previously they were not favoured i.e. sites 4, 23, and 25. Furthermore, site 23 was highlighted as being no longer considered suitable on the basis of reduced housing numbers (Appendix 10, paragraph 2.3 refers) but appears to have re-emerged in Figure 6 of the CNMNDP. Again, the reasoning behind this not made clear in the evidence or the CNMNDP. RPS notes that site 22 appears to be the most favoured site identified by CNMPC and AECOM.
- 5.4 Further to CNMPC's own evidence, a separate site assessment exercise was carried out by AECOM in 2019. This also assessed the 25 site options identified in the earlier work, based on 'desktop studies and site visits' (Appendix 10, paragraph 2.4 refers). The results are presented in a Site Assessment Summary table in the AECOM sites study (Table 5-1 refers). This assessment favoured a total of nine sites; these being sites 2, 3, 4, 5, 13, 16, 22, 24, and 25, which correspond the sites shown in Figure 6 of the CNMNDP. Whilst there is some overlap between the two studies (both studies favour site 22), there are also some difference between them. The Comparison of Site Assessment Studies (CSAS) 2020 tries to explain the differences between the two studies.
- 5.5 What is clear, nonetheless, is that both studies have employed different methodologies, and so it is not a surprise that difference have emerged. However, this does not assist the reader in understanding why the CNMPC has decided upon its final 'preference' for the six sites shown in the CNMNDP.

Summary of Site Assessment Findings – Site 12 (Appendix 10)

- 5.6 Located as shown above, site 12 ('Land north of Braces Lane, Marlbrook') has been marked as 'Unacceptable' in the HSA, and 'not currently suitable' in the AECOM sites study. Set out below is an extract from the CSAS, which allows direct comparison in term of summary findings for the site, with the AECOM summary to the left, and CNMPC's to the right. What is clear is that landscape and topography are the principle reasons as to why the site is not supported in the AECOM sites study, whilst access is also flagged in the HSA.
- 5.7 RPS do agree in part with the findings of the Landscape and Visual Sensitivity Capacity Assessment with regards to the assessment of the entire Local Landscape Character Area – as some of the findings are applicable, and the land to the north-east of the site is more

visually sensitive and rural in character. However, the LLCA represents a broader area than the site, and the site itself is far more influenced by the urban edge than the rest of the LLCA, and much more well contained both physically and visually. The technical work completed by Tyler Grange on landscape and visual matters demonstrates that there will be a limited impact on landscape character, restricted to the loss of the fields on site and some degree of change to views within a very localised area. Furthermore, the likely impacts on the surrounding landscape and on views from public locations can be mitigated to ensure development on the site assimilates with the adjoining settled context.

5.8 Similarly, whilst access will need to be a matter addressed as part of any new development, this is not considered to be to such an extent as to cause an unacceptable impact on highway safety (at the A38) or any severe residual cumulative impact on the road network. Again, to support this view, a technical report on transport and highways has been prepared and is submitted alongside these representations. This clearly shows that any potential or likely impacts on the network can be mitigated based on delivery of 125 number of dwellings accessing the highway onto the Birmingham Road.

12	Land to north of Braces Lane, Marlbrook	<p>The site is considered to have a low/medium capacity for development as set out in the Catshill and North Marlbrook Parish Landscape + Visual Sensitivity Capacity Assessment (February 2018).</p> <p>The site is on a plateau and development would be visible from the surrounding area.</p>	<p>Low to medium capacity to accept development but site is well-located in relation to adjacent development in North Marlbrook meaning its impact on the GB would be less damaging than some other options.</p> <p>Topography, however, means development would have a significant impact on the landscape because of the site's prominent location on rising land meaning that visual intrusion would be severe when viewed from Braces Lane and the</p>
		<p>Land to the south of the site which is not on the plateau has a steep gradient and would be not able to accommodate development without significant ground engineering.</p> <p>The site is not considered suitable for allocation in the Neighbourhood Plan on the grounds of landscape capacity and topography.</p>	<p>area of open space. This would reinforce its impact.</p> <p>Access is a significant problem with new housing introducing extra traffic via a new/modified access point directly onto the A38 which is heavily trafficked. Access issues are compounded by a number of other nearby uses adding to concerns regarding highway safety.</p> <p>If issues could be satisfactorily addressed, limited impact on GB means site could have some potential but only in the event that other sites are not forthcoming.</p>

Extracts from Section A of Appendix 10 Comparison Study of Site Assessment Studies

RPS response to individual scoring tables for site 12 – HSA assessment (Appendix 7)

5.9 Section B of the HSA sets out the assessment of the 25 individual land parcels. The HSA notes that Land north of Braces Lane, Marlbrook (site 12) forms part of site BDC210 (the whole of it, in fact) which was assessed as part of the Bromsgrove District SHLAA 2015.

- 5.10 Under 'Physical Attributes – 'Topography', the HSA states that 'Land rises sharply from south to north'. Whilst it is accepted that the topography of the site does slope upwards, it is arguable whether the land does in fact rise 'sharply'. The CNMNDP does not define the term 'sharply' and so therefore represents a subjective assessment rather than being based on objective analysis. Furthermore, the reference to a single viewpoint (south to north) excludes consideration of different views available of the site from other vantage points, for example views looking north to south across the site. The evidence is therefore considered to be partial and should be revisited. This is important because it is the comment on topography that forms the basis for the assessment of landscape impact, one to principal reasons for the 'red' score assigned to the site (see below for further comment on this). Accordingly, the Landscape and Visual Note provided by Tyler Grange (appended to the rear of this report) considers several views within the local area, and further afield, which take account of orientation, distance, and the receptor experiencing the view.
- 5.11 Under 'nature interest', the HSA describes the site as an 'area of unmaintained land following stream course immediately south of the site likely to provide wildlife habitats'. In terms of biodiversity, RPS acknowledge that there may be some interest but this is not quantified or assessed as part of the evidence base presented. Furthermore, the comment only makes reference in the context of a relatively small sub-area of site 12, focusing on the southerly extent only. This ignores the large majority of the site which is formed of low-grade agricultural land offering even less opportunity to support wildlife.
- 5.12 Under 'flood risk', the HSA states 'none known - potential in southern edge of Marlbrook stream on south east boundary'. However, what is known is that information available from the Environment Agency flood mapping tool identifies site 12 as being in 'flood zone 1', an area with a low (lowest) probability of flooding.
- 5.13 Under 'Agricultural Land Quality', RPS notes that the site is classed as 'Poor – Grade 4'.
- 5.14 Under 'physical access', the access point to the site as being 'hindered by recreational area to south an properties to west'. However, it is clearly possible to create a viable access directly off the Birmingham Road (A38) into the site, which the HSA itself recognises under the response to 'access options'. The transport note submitted alongside these representations (Appendix E) illustrate how the access can be achieved to ensure safe access to and egress from the site, a matter which has been subject to consultation with Worcestershire County Council (WCC) as the relevant Local Highways Authority (LHA). A letter setting out the discussions held with the LHA and the agreement sought is enclosed as Appendix F for reference. Therefore, the HSA is not considered to be adequately justified in terms of the finding that access being 'hindered' in planning terms.

- 5.15 RPS notes the finding, under 'GB impact' that 'development would consolidate built form in this part of Marlbrook but would be contained by existing development on two sides. Limited threat to GB gap...' and that defensive green belt boundaries could be created on three sides by existing development.
- 5.16 Under 'landscape impact', as discussed above, the HSA describes development on site 12 as having 'significant impact on local landscape because of topography and views of site from Braces Lane.' The site is therefore scored as having 'low to medium capacity to accept development'. However, independent evidence prepared by Tyler Grange (Appendix G) has assessed the potential impact on landscape which although raises the same sensitivities as identified by the HSA, specifically its topography and views from Braces Lane, questions the legitimacy of the assessment of impact. It is highlighted in Tyler Grange's report how no clear methodology is presented to which the landscape and visual impacts of development are assessed within the HSA, with the assessment not providing any substantiation or evidence to support the judgements made, and not giving any form of robust consideration to Sensitivity or the capacity of the landscape to accommodate the specific nature of development proposed i.e. housing. The evidence provided by Tyler Grange therefore considers these matters whilst also taking a step further to consider how proposals can reduce and/or mitigate to the point that it does not undermine the landscape quality in this part of the CNMNDP area.
- 5.17 RPS notes the reference under 'ecological constraints' to the requirement to 'safeguard flood plain to stream course to the south'. This is in correct as there is no known flood plain in this area given the site is located wholly within Flood Zone 1 (the lowest flood risk measure'.
- 5.18 Under the section 'Proximity to Facilities and Services' the HSA scores the site as 'unsuitable' in terms of access to; main shopping area/Post office (1,280 metres); closest mini-supermarket (1,000 metres); health facilities 1,1190-1,470 metres); and schools (1,260 metres to one mile).
- 5.19 In relation to shopping facilities accessible in the local area, the site has access to a number of retail facilities offering 'top-up' shopping equivalent to a 'mini supermarket' (though this is also not defined in the HSA), the closest being a petrol filling station with a small retail shopping offer attached (Esso Garage) located within 300 metres of the site (following an assumed pedestrian route). Similarly, a more substantive shopping outlet (Tesco Express) with ATM is located approximately 800 metres away along Braces Lane.
- 5.20 In relation to education facilities, the furthest school identified is one mile away from the site. On this basis, the site scores 'unsuitable'. However, the national statutory walking

distance for pupils is far greater than this. Current Government guidance⁶ used for the purposes of providing transport services states that a child should be able to walk:

- two miles (or 3,200 metres) for children under eight years of age; and
- three miles (or 4,800 metres) for pupils aged 8–16 years.

- 5.21 Any journey longer than the statutory walking distance will mean a child is automatically entitled to help with transport.
- 5.22 On this basis, on both counts the site is accessible to local schools well within the stated guidelines and so should not be scored as ‘unsuitable’.
- 5.23 In addition, other facilities not recorded (due to the not falling within the narrow scope of the HSA criteria) are also located within walking distance, including a public house (Miller and Carter Steak House) and hotels (Travel Lodge Bromsgrove and Bromsgrove Hotel and Spa) located at the junction of Braces Lane and Birmingham Road.
- 5.24 Under the section ‘Comments’, RPS notes the opinions expressed regarding access onto the A38 for north-bound vehicles ‘would present considerable problems in view of the volume of traffic on this road unless major re-engineering of access in this location could be achieved’. However, as highlighted above, there is no evidence presented in the CNMNDP to substantiate these claims, given that an access is already available off the A38 to the site and which can be designed to facilitate safe access and egress. In addition, a junction capacity assessment has been undertaken for the proposed development of 125 dwellings which has shown that the junction would operate within capacity on this basis (as detailed in Appendix E).
- 5.25 The outcome of the HSA is that the ‘Overall Suitability’ is scored as ‘unsuitable’, stating ‘development would have a serious and unacceptable impact on the landscape and pose significant access issues’. RPS notes the conclusions of the latest Bromsgrove SHLAA 2015 report which found the site to have ‘Green Belt Potential’ and that the site scored generally well against the SHLAA ‘site suitability assessment’ criteria, only scoring ‘red’ or unsuitable in terms of its existing Green Belt designation. The SHLAA, therefore, found no fundamental or over-riding constraints to suitability of the site for housing.
- 5.26 In conclusion, and based on the foregoing analysis (supported by a number of separate technical evidence that question the validity of the HSA findings), RPS suggests that the

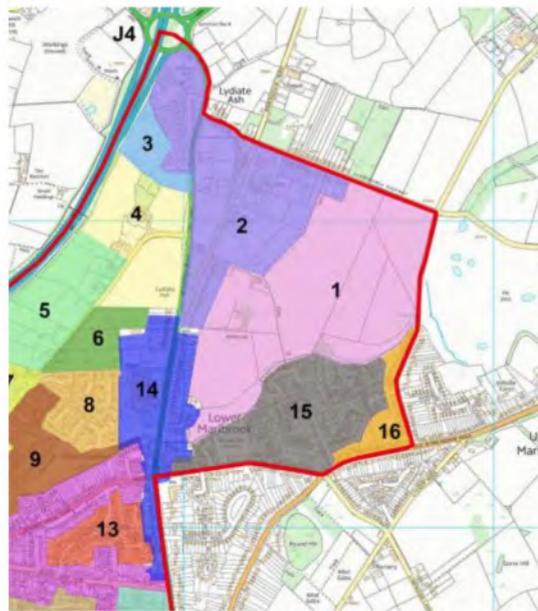
⁶ DoE *Home to school travel and transport guidance Statutory guidance for local authorities* July 2014, paragraph 16

scores assigned to site 12 highlighted above are not justified and so site 12 should be re-evaluated accordingly.

RPS response to individual scoring tables for site 12 – AECOM assessment (Appendix 9)

- 5.27 It is noted that CNMPC sought the advice of consultants AECOM, who produced a Site Assessment Report in 2019 (Appendix 9 to the CNMNDP). The purpose of commissioning a second, though not duplicate, housing site assessment was ‘...intended to help inform and validate the housing content of the NP...’ (Appendix 10, paragraph 2.4 refers). RPS also notes the only similarity between the two assessments is that they both assessed the same 25 housing site options.
- 5.28 As highlighted above, the principle objection on suitability grounds based on the AECOM work is that of ‘landscape sensitivity and capacity’. This however draws heavily on the Catshill and North Marlbrook Parish Landscape and Visual Sensitivity Capacity Assessment (dated February 2018) prepared by One Creative Environments Ltd (Appendix 3 of the CNMNDP refers). Nonetheless, RPS has some comments on the assessment findings in relation to site 12, set out below.
- 5.29 The site assessment proforma for site 12 is set out at Appendix A of the AECOM sites study. Under ‘Context’, the fact the site is greenfield renders the site as ‘unsuitable for allocation in the neighbourhood plan’ according to AECOM’s rating system. However, the fact the site is greenfield is immaterial as both the District and Parish Councils admit that Bromsgrove cannot meet its current housing requirement shortfall without developing on greenfield and Green Belt) sites. Therefore, the status of the site should be considered as a matter of fact rather than impact on the overall suitability score for the site.
- 5.30 Under suitability, the site scores ‘amber’ due to its location connected to the built-up area. A score of ‘green’ would have been applied had the site been located ‘within the existing built-up area’. Again, there is a lack of consideration of local context in the AECOM sites study given the accepted lack of brownfield land available within existing built-up areas to meet the housing requirement shortfall in Bromsgrove. Consequently, RPS suggest a more appropriate scoring system would simply measure the sites based on whether they are ‘within/adjacent’ vs ‘outside’ existing built-up areas.
- 5.31 In terms of access potential, RPS notes the finding that the site can achieve a suitable access to traffic, contrary to the HSA.
- 5.32 In respect of ‘landscape’ the finding simply mirrors the other landscape evidence mentioned above.

5.33 It appears therefore that the judgement of landscape sensitivity derived by AECOM is exclusively based on evidence provided within the Catshill and North Marlbrook Parish Landscape and Visual Sensitivity Capacity Assessment. The AECOM study does not acknowledge the wider area within which the site is actually identified within the Landscape and Visual Sensitivity Capacity Assessment, (LLCA 1) which includes open, rolling arable fields to the north east. The extents of LLCA 1 are illustrated below:



5.34 Therefore to an extent whilst some of the features and sensitivities identified within the Sensitivity Capacity Assessment hold true for the site, including its rolling landform and views from the south, the AECOM study does not fully take into account the site specifics. Tyler Grange’s independent assessment provides that more specific level of site assessment in relation to these wider studies, and with reference to the specific type of development proposed (housing), in line with best practice guidance on landscape and visual impacts.

5.35 Furthermore, regarding AECOMs assessment of the site as having a High visual sensitivity to development, the visual effects of development would be far more localised in comparison to if the whole LLCA was developed, and the composition of the view is already compromised by residential built form in contrast to the more open rural land to the north-east of the site.

5.36 Under ‘Agricultural Land’ RPS notes that the AECOM sites study states the land is within ‘grade 3’, though it does not states that the site is grade 3a, which would mean the site was of ‘best and most versatile’ type. This contradicts the HSA finding, which states that the site

is 'poor – grade 4' land. Consequently, RPS suggest it is most likely that the site is not does not fall within the best and most versatile category and so its loss would not undermine the supply of good quality agricultural land in the area.

- 5.37 Under 'Heritage Considerations', RPS notes that the site has limited or no impact or no requirement for mitigation according to AECOM's analysis, which is broadly supported.
- 5.38 Under 'Community facilities and services', RPS notes that the findings score 'amber' for distance to 'town /local centre/ shop' (400-1,200 metres). However, as highlighted above, there is petrol filling station (ESSO garage) is 300 metres from site 12, which provides access to daily/top-up goods. It is therefore suggested that a 'shop' with less than 400 metres away and so should score 'green'.
- 5.39 In terms of scoring access or distance to train stations, RPS suggests this criteria is essentially meaningless given that there is no train station in the CNMNDP area. Nonetheless, despite this, Catshill and Marlbrook is one of the Districts named settlements and so is an accepted foci for growth. RPS suggests that the criterion for train stations should be deleted in line with the HSA which does not assess the sites on this basis.
- 5.40 In terms of distance to health facilities, the AECOM sites study scores site 12 as 'red' (unsuitable) on the basis that the site is over 1,200 metres from the site. However, RPS has measured the distance between the site and the nearest pharmacy (Knights Catshill) based on pedestrian access and suggest the site is just at the limit of this criterion (400-1,200 metres) and so, on this basis, should score 'amber' (suitable with mitigations), and not 'red'.
- 5.41 Consequently, when taking into the above amendments in relation to community facilities and services, the scoring for site 12 should be revisited. When taken into account, this would improve the overall suitability of the site for housing.
- 5.42 Under 'Other key considerations', RPS notes the finding that development on the site is unlikely to lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies.
- 5.43 Under the next section, 'Topography', RPS notes that the AECOM sites study finds the site exhibits a 'plateau, steep gradient'. However, it is GSL's view that the steep gradient only applies to a small proportion of the site when taken as a whole. The vast majority of the site can therefore be characterised more as sitting on a 'plateau', especially when viewed from the northern boundary looking southwards. As can be seen from views across this plateau, development would sit at a similar height to the surrounding build development in the vicinity of the site.

5.44 Under 'Availability', the AECOM sites study states that the site is not available for development. This is plainly wrong and should be corrected. Site 12 has been promoted consistently throughout the plan-making process in Bromsgrove including through the CNMNDP process. Furthermore, the site could be brought forward relatively quickly as there are no over-riding physical, legal or technical constraints on development.

Comment on AECOM's summary conclusions

5.45 The AECOM sites study concludes that the site is neither suitable nor available for development and has both minor and significant constraints. The reason given for excluding the sites as a possible allocation is on the basis that the site:

- is considered to have a low /medium capacity for development as set out in the Catshill and North Marlbrook Parish Landscape + Visual Sensitivity Capacity Assessment (February 2018).
- The site is on a plateau and development would be visible from the surrounding area; and the
- Land to the south of the site which is not on the plateau has a steep gradient and would be not able to accommodate development without significant ground engineering.
- The site is not considered suitable for allocation in the Neighbourhood Plan on the grounds of landscape capacity and topography.

5.46 RPS raises some concerns with these concluding remarks. Firstly, there is nothing in the sites methodology applied by AECOM to suggest that sites with 'low/medium' capacity for development should be excluded as a matter of principle, merely that there might be an impact from development. Secondly, all of the issues identified are capable of being addressed through a process of sensitive design and planning of the layout that takes into the site's topography. Thirdly, any new development that would sit on the 'plateau' would sit broadly at the same height as the existing development along Birmingham Road (to the west and south) and to the rear of Cottage Lane (further to the east). And lastly, based on the indicative masterplan layout prepared on behalf of FPCR, there is the intention to safeguard and protect the vast majority of the 'land to the south of the site which is not on the plateau' and so the conclusion in this regard is not pertinent. The masterplan has been developed from the outset as 'landscape led', with a view to bake in mitigation into the scheme to drive forward a sympathetic development. The masterplan has evolved since it was first submitted to the Parish Council for consideration, and latterly, has incorporated a

green buffer on the southern boundary of the site, to indicate how, subject to the wider development of this land, the site could align with the ambitions of the Neighbourhood Plan.

5.47 Consequently, RPS does not agree with the conclusions of the AECOM sites study as the exclusion of site 12 is not sufficiently evidenced or justified.

Site Assessment – comparative analysis

5.48 Further to the critique set out above of the two site assessments undertaken by CNMPC and on their behalf by AECOM, RPS has carried out a comparison exercise of the six preferred housing sites (sites 4, 21, 22, 23, 24, and 25) alongside site 12.

5.49 To assist in illustrating the analysis set out here, a number of tables are appended to these representations which summarises the findings on each site taken from the Housing Site Assessment (HSA) published in Appendix 7 to the CNMNDP. To help the reader, these appendices are referenced B to D. These tables draw together the assessment findings on each site to allow a straightforward comparison to be made across the various criteria.

Physical Attributes

5.50 Appendix B summarises the findings in relation to 'Physical Attributes' of each site.

5.51 As highlighted above, site 12 is graded as 'Poor - Grade 4' agricultural land. However, a number of preferred sites (sites 4, 21, 22, 23 and 24) are graded as 'best of most versatile' (Grade 2) whilst site 25 is not scored at all.

5.52 National planning policy is clear that plans should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land (NPPF, paragraph 170 refers). The CNMNDP does not address this and also does not explain in the HSA why land of higher quality for agriculture should be preferred over sites of poorer quality (inc. site 12).

5.53 RPS also notes that a number of records have been omitted from the attributes assessment. In particular, consideration of air quality and noise pollution are not recorded for sites 4, 21, 22 (the most preferred site), 24 or 25, with the exception being site 23. From the assessment, site 12 scores best for noise pollution (60-65 dBA) compared to site 23 (60-70 dBA). This is an important omission given that sites 4, 23, 24 and 25 all sit contiguous to the M5, a major source of air pollutants in the District.

5.54 Consequently, RPS suggest that site 12 scores equally well and, against some criteria, even better than some of the preferred sites in the CNMNDP.

Suitability

- 5.55 Appendix C summarises the findings in relation to ‘suitability’ of each site.

Physical Access and Access Options

- 5.56 Under these criteria, RPS has also raised concerns above with the evidence base and a lack of justification within it suggesting that access to and from site would be ‘hindered’, thus marking the site negatively in the assessment.
- 5.57 In addition, a number of preferred sites are flagged as having ‘potential safety issues’ (site 21) and where sight lines may be ‘adversely affected’ (site 25). In comparison, site 12 can be accessed and this is acknowledged by CNMPC, and would not raise any similar concerns to those highlighted on other sites.

Proximity to built-up area

- 5.58 Under this criterion, it is recognised that site 12 is contained by ‘housing to the west and east and recreational land to the south’. This measure of containment is also recognised in relation the ‘GB defensible boundaries’ criteria later on. However, sites 4, 23, 24 and 25 are arguably less contained by the existing built-up area and rely heavily on their location between it and the M5 for any sense of containment. On this basis, RPS suggest that site 12 scores better than a number of preferred sites in terms of proximity.

Landscape Impact

- 5.59 Under this criterion, the assessment flags up the issue of landscape impact as effectively being a ‘show-stopper’ on any development at all on site 12. However, whilst all the sites are marked as having some impact on landscape, to a greater or lesser degree, all the sites (with the exception of site 25) have referenced within the assessment some form of mitigation (i.e. ‘...potential for green infrastructure...’) or other counter-balancing comment (i.e. ‘...masked to some extent when viewed from locations in the vicinity...’) which has been used as part of the justification for including them as preferred sites.
- 5.60 However, such comments have not been applied to site 12 despite the assessment stating that the site is ‘...well contained on three sides...’. Similarly, the assessment for site 12 only refers to a single viewpoint and on this basis the site is flagged as having a ‘significant impact’. Therefore, RPS considers that site 12 has been treated unfairly when viewed alongside the other sites with respect to landscape. Furthermore, technical evidence submitted alongside these representations demonstrate that the significance of any landscape impact has been over-estimated in the CNMNDP and any perceived impact can

be suitably mitigation through sensitive design of the site. On this basis, RPS suggests that the assessment of site 12 should re-evaluated to reflect this latest evidence.

Proximity to Facilities and Services

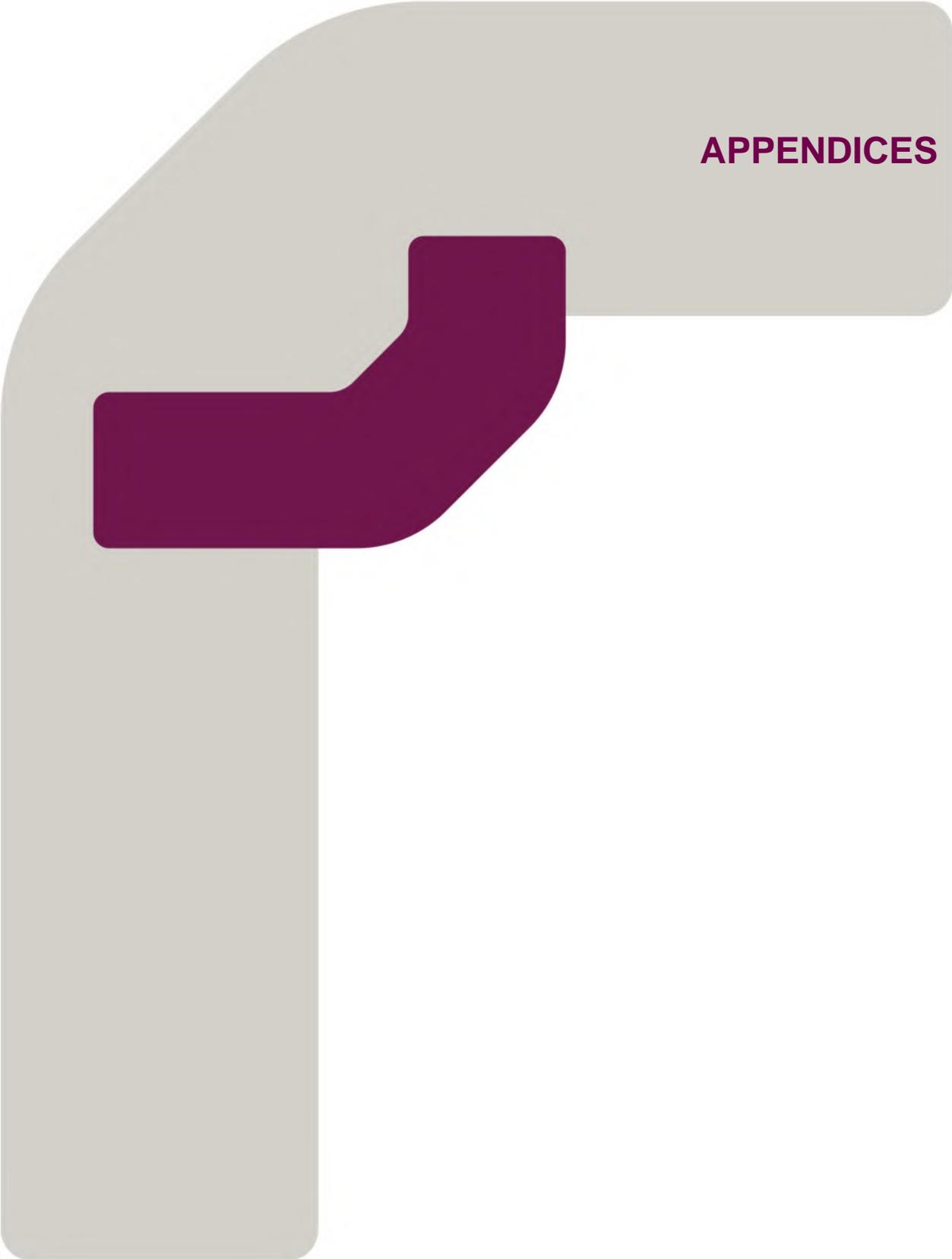
- 5.61 Appendix D summarises the findings in relation to ‘proximity’ of each site to local facilities.
- 5.62 RPS has highlighted above a number of problems with the approach in the CNMNDP on scoring of site 12 in terms of accessibility to services, in particular some errors in the distances measured.
- 5.63 Based on the published evidence, as shown in Appendix 2c, site 12 ranks sixth (at 9,880 metres), ahead of site 23 (which measures a lowly 11,455 metres) and close to site 21 (9,330 metres) when totalling the estimated distance across all ten types of service.
- 5.64 RPS’ assessment is supplemented with a more detailed assessment of accessibility, included as part of the Transport Technical Note (at Appendix E). This assessment has been able to map the distance of key services and facilities from the site, and includes an appreciation of the likely walking distances for each key feature.
- 5.65 It is further noted that site 12 scores well in relation to access to bus stops, open space (at Braces Lane), and footpath/cycle routes when compared to a number of preferred sites.

Conclusions on site assessment

- 5.66 Based on the foregoing analysis, RPS has shown that site 12 performs considerably better against the site assessment criteria than is presented in either of the two evidence documents published to date. This includes in response to a number of errors identified in the distance measures applied to site 12 in the published evidence.
- 5.67 Similarly, RPS consider that the perceived impacts in terms of landscape, access and highways at site 12, as set out in the published evidence, has been over-estimated. This view is supported by a number of alternative technical assessments submitted alongside these representations which show that any likely impacts can be suitably mitigated and thus should not rule out development or allocation of site 12 in the development plan.
- 5.68 Consequently, RPS consider that development of site 12 is unlikely to lead to the scale of impacts suggested in the CNMNDP evidence base, and where impacts are likely these can be suitably mitigated. On this basis, RPS consider that any future consideration of site 12 in the process of assessing and selecting reasonable alternatives for inclusion in the development plan should give proper regard to the evidence available.

6 CONCLUSIONS

- 6.1 RPS are grateful for the opportunity to comment on the CNMNDP and would like to express our support for neighbourhood planning. We do however have a number of significant concerns relating to the ability of the CNMNDP to meet those basic conditions required by the Town and Country Planning Act.
- 6.2 As expressed in these representations, RPS is concerned by the approach taken in the identification of housing need as part of the wider strategy for housing, including the site assessment material. This strategy will not contribute to meeting the housing needs for the parish, and fails to meet the basic conditions linked to the contribution towards sustainable development (test 8d). The Parish will no doubt be aware that the District Council's plan is in urgent need of review, and there are currently no clear means to address the shortfall that currently exists, in addition to the future need, to be defined using the Government's revised formula. To seek to identify possible allocations without understanding the full extent of this need, and a potential change to the spatial strategy would be premature, and contrary basic condition test 8e. Consequently, RPS consider that this material should be deleted from the plan in its entirety.
- 6.3 Much of this submission has been presented to address details pertaining to the assessment of sites in the CNMNDP evidence base, and in particular, the treatment of our client's land on 'Site 12 – Braces Lane'. On a number of fronts, RPS disagrees with the approach taken and the limited information presented to derive at the conclusions on this Site. This is RPS' view fails to have regard of Paragraph 31 of the NPPF, which states:
- "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."*
- 6.4 This is relevant for Local Plans and Neighbourhood Plans alike. To satisfy the Basic Conditions, Neighbourhood Plans need to demonstrate a robust evidence base, something that RPS consider is clearly lacking where concerned with the assessment of potential land parcels.
- 6.5 Supported by technical evidence, RPS considers that Site 12 (Braces Lane) is a suitable and deliverable site, and represents one of the strongest land parcels when considering removing land from the Green Belt. RPS will continue to promote the site through the emerging review of the Bromsgrove Local Plan, which is considered the most appropriate vehicle to deliver the scale of growth that the Parish needs. RPS welcomes further engagement with the Parish through the development of this document and trusts that the evidence prepared in this submission will assist in the support of this promotion.



APPENDICES

BIRMINGHAM ROAD

DEVELOPMENT VISION

November 2019

Land east of Birmingham Road | Marlbrook | Bromsgrove

EXISTING PLAY
AREA

SPORTS FIELD



GREEN SLADE CRES

“Gleeson Strategic Land are part of M J Gleeson Plc and play a significant role in strategic land throughout the country. With over 100 years’ experience in the of the development industry, Gleeson Strategic Land is an established promoter of land with a proven track record of bringing forward sustainable residential developments which work towards addressing the severe national shortage of land for housing. Gleeson Developments values working with local representatives of the community and local authorities and remains committed to engagement as part of the promotion of new developments”;





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1

INTRODUCTION

This document:

- Describes the site and surroundings
- Provides a brief overview of planning policy and the emerging housing needs
- Assesses the suitability of the site for release in relation to the purposes of the Green Belt
- Demonstrates that the site is sustainable including a summary of technical work
- Presents a development vision for the site



Figure 1: Marlbrook & Catshill

Land east of Birmingham Road, Marlbrook, provides an ideal opportunity to create a sustainable, distinctive and attractive residential community to help with meeting future housing needs.

The land is under the control of Gleeson Strategic Land Ltd (Gleeson), a national and respected developer who is committed to working with Bromsgrove District Council and the local community, as it has done elsewhere within Worcestershire, to design a high-quality and sympathetic development which delivers social, environmental and economic benefits for the area.

Marlbrook is a thriving settlement within Bromsgrove District that is ideally placed to deliver future housing growth. It is a sustainable location that is well served by public transport and a variety of services that are required to support the needs of future residents. Marlbrook has the capacity to contribute towards the shortfalls of housing provision in the borough. This document provides a vision for the development of a sustainable residential

community on Land east of Birmingham Road. It explains the technical work which has been carried out by Gleeson to inform our initial development vision for the site, and paves the way for more detailed consultation with the Council and the local community to appropriately refine the proposals.

The Development Vision has been prepared in the context of the anticipated review of the Green Belt to inform the Bromsgrove Development Plan Review. This follows the recommendations of the Local Plan Inspector that the Local Plan needs to provide a mechanism to address the District's housing shortfall of 2,300 dwellings up to 2030 identified as part of the Examination process. The subsequent Bromsgrove Development Plan Review Update and Further Consultation published in September 2019 proposes an extension of the period covered by the Local Plan up to 2040. It also indicates that there are likely to be exceptional circumstances to justify a review of the Green Belt as part of this process. The current timetable for the Bromsgrove Development Plan Review set out in the Council's Local Development Scheme proposes adoption

of the revised Bromsgrove Development Plan by November 2022.

Gleeson has appointed a consultant team to assist in preparing an appropriate development vision for the site. The principal team members comprise RPS (Planning Consultants), FPCR (Masterplanners), Barry Chinn Associates (Landscape), Pearce Environment (Ecology) and PBA (Highway Engineers).

2

THE SITE & SURROUNDING AREA

Strategic Location

Marlbrook is located in Bromsgrove District included as part of the wider settlement of Catshill, which is defined as a “Large Settlement” in the Bromsgrove District Plan (2017). The village has a population of around 8,551 (2011 Census) and is situated approximately 2.6 miles north of the main town of Bromsgrove.

Marlbrook benefits from excellent connectivity owing to access to Junction 4 of the M5 Motorway to the north of the settlement and Junction 1 of the M42 to the south. The A38 runs through Marlbrook which is on the bus route between Birmingham and Bromsgrove, which served as a key catalyst for growth of the settlement during the 1960s. The 144 bus service operates between Birmingham and Worcester and passes through Marlbrook every 30 minutes. The nearest rail station is Barnt Green (c.4.3km) on Fiery Hill Road and there is also the Longbridge Rail Station on Longbridge Lane. Both are served by London Midland and combined they provide a frequency of six trains

per hour to Birmingham with a travel time of 20 minutes.

There are several local amenities in close proximity to the site with the majority located on the western side of the A38 in Upper Catshill. The services include two food stores, a post office and GP surgery. There are also two primary schools, Catshill First School and Lickey Hills Primary School; and the secondary school Catshill Middle School.

There are four Grade II listed buildings in the Parish with two being to the southwest of the site, Christ Church (c.1.2km) and Catshill and North Marlbrook War Memorial (c.1.4km) and two to the north, Gate Piers east of no.61 and Lydiate Ash House (both c.745m).

The settlements of Marlbrook and Catshill are enveloped by the Green Belt and are free from other statutory designations such as SSSIs, SACs, Conservation Areas, etc.

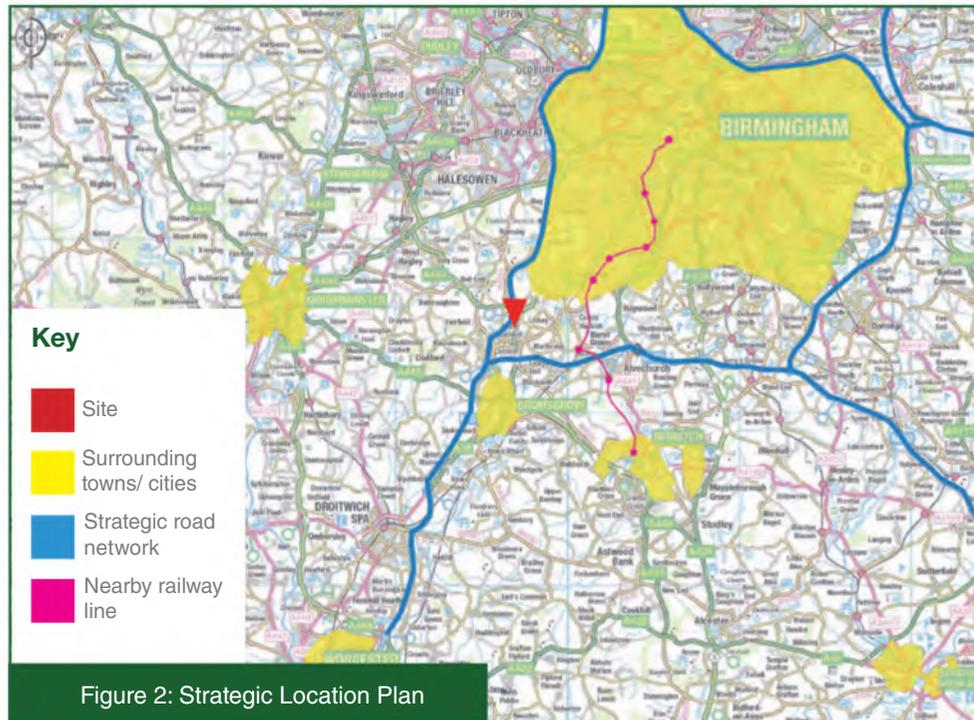


Figure 2: Strategic Location Plan



Figure 3: Site Plan

Land Control

The site comprises 7.4ha of agricultural fields approximately four kilometres north on Bromsgrove town centre. The site is contained by housing to the west, south and southeast, with agricultural land to the north and northeast. Access would be off Birmingham Road (A38) to the west. The land controlled by Gleeson comprises three fields (used for agricultural purposes) within the Green Belt, consistent with the majority of open land adjacent to the village, and is bound by hedgerows and trees. There is a network of Public Rights of Way (PROWs) in the vicinity of the site that provides connectivity to the surrounding area such as Birmingham Road, Alvechurch Highway, Cottage Lane, Green Lane, Woodrow Lane and Golden Cross Lane.

In terms of constraints, the southern part of the site (reference BDC61) and the whole site (reference BDC210) was assessed within Bromsgrove District Council’s 2015 Strategic Housing Land Availability Assessment (SHLAA), and were listed as Green Belt potential sites. Both sites scored well under Stage A and under the Stage B both sites were not considered unsuitable in any category with the only significant constraint being the Green Belt.

The land controlled by Gleeson has the potential to be delivered in-line with the Council’s timeframes for Green Belt Review as part of a strategy to address unmet housing need in the District and deliver growth in one of the most sustainable settlements. The land comprises fields in agricultural use with two wooden sheds at the southwest corner of the site. The site has no current agricultural tenancy.

Surroundings

To the north, the site partly abuts a lane that serves the property Bellevue and an agricultural field. To the east the site abuts an agricultural field and the rear boundaries of several residential properties that are served off Cottage Lane that are part of a wider housing estate. Along the southern boundary is a shallow brook and a recreation ground served off Braces Lane along with residential boundaries off Redland Close and Brook Fields Close. To the west the site abuts the rear boundaries of residential dwellings along Birmingham Road (A38). The site is relatively well contained amongst the existing built-up area and its development for housing would be complimentary to the character of the existing settlement where it would be more of an ‘in-fill’ development rather than an extension to the settlement boundary. The development of the site represents the most logical option for further housing growth of Marlbrook / Catshill.

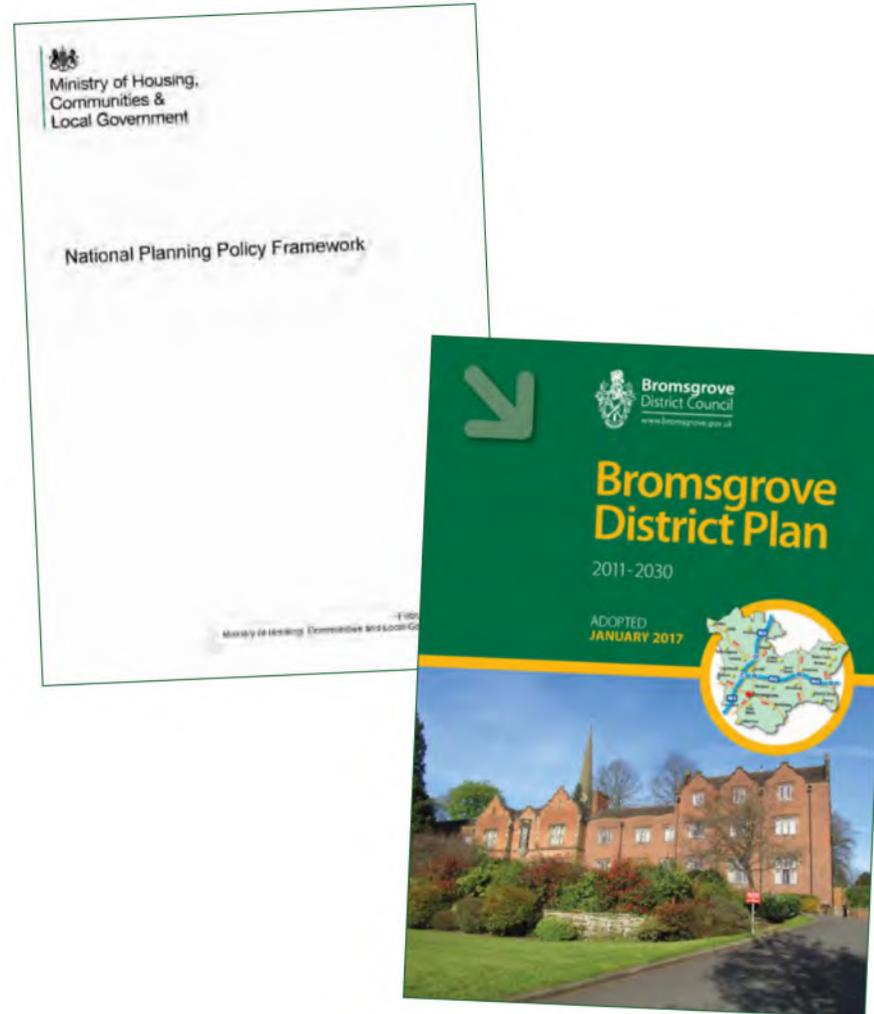


**PLANNING
POLICY &
BROMSGROVE'S
HOUSING NEEDS**

National Planning Policy

The National Planning Policy Framework (NPPF) (February 2019) is primarily of relevance in relation to the site's Green Belt status. Green Belt serves five specific purposes (para. 134 – refer to Section 4) and once established their boundaries should only be altered in “exceptional circumstances” through the preparation or review of the local plan (para. 136). When reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development (para. 138).

Before concluding that exceptional circumstances exist Local Planning Authorities are required to demonstrate that they have examined fully all other reasonable options (para. 137).



Development Plan

National Green Belt policies are relevant in the context of the Bromsgrove Local Plan Review. This follows the recommendations of the Bromsgrove Local Plan Inspector that the plan needs to be reviewed to address the district's current housing shortfall of some 2,300 dwellings up to 2030 which cannot be reasonably met through non-Green Belt locations in the district. The Bromsgrove Development Plan Review Update and Further Consultation published in September 2019 proposes to address this shortfall and an extension of the plan period to 2040. Consistent with the Local Plan Inspector's recommendations it indicates that there are likely to be exceptional circumstances to justify a review of the Green Belt as part of this process.

The Bromsgrove Development Plan Review Update and Further Consultation (September 2019) indicates that the minimum housing requirement for the district from 2023 to 2040 is 6443 new homes and suggests that this is likely to be adjusted upwards to align with economic growth ambitions and to meet the need for specialist accommodation.

The Birmingham Development Plan (January 2017) identifies 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city. It requires neighbouring Councils to work together to provide an appropriate contribution towards Birmingham's housing needs.

The development plan for Bromsgrove comprises the District Plan (January 2017) which runs from 2011-2030 and sets out the strategic policies for the District. An indicative timetable for the Bromsgrove Development Plan Review published alongside the Bromsgrove Development Plan Review Update and Further Consultation (September 2019) indicates that the revised Bromsgrove Development Plan will be adopted in November 2022.

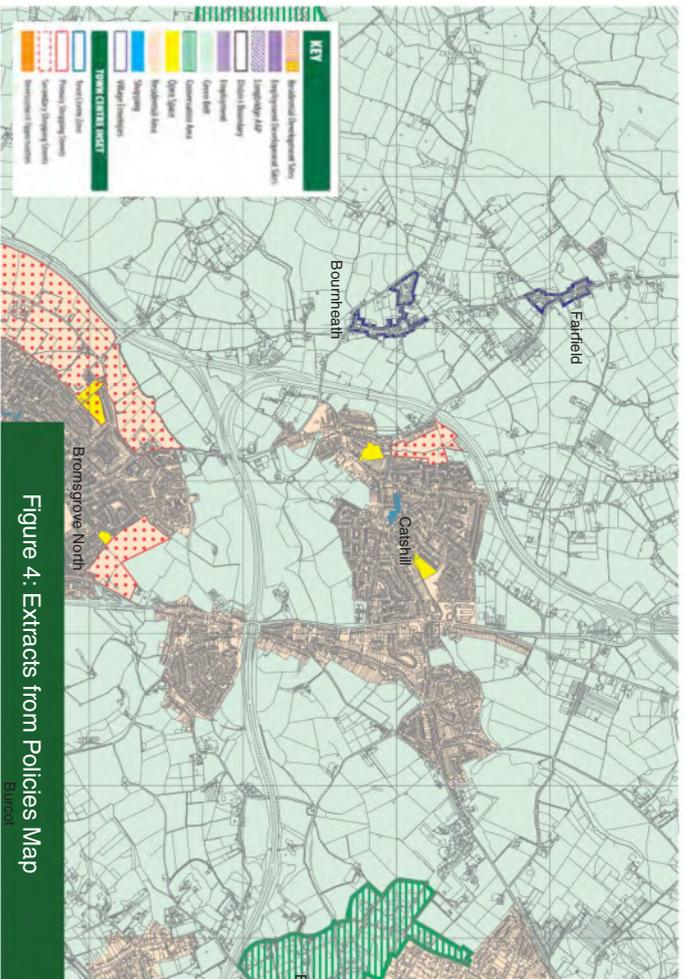


Figure 4: Extracts from Policies Map

The District Plan Key Diagram is shown opposite alongside extracts from the adopted Policies Map relating to Marlbrook, which have guided the direction of the masterplan in this promotional document. The principal aspects of the District Plan are as follows:

- Around 7,000 new homes are required to meet the full housing requirement of the District up to 2030. On non-Green Belt land 4,700 homes can be achieved with the remaining 2,300 being identified as part of the Green Belt Review.
- Marlbrook is part of Catshill Parish which is identified as a “Large Settlement” within the settlement hierarchy.
- Policy BDP3 – Future Housing and Employment Growth recognises the need for 2,300 homes to be delivered via the Green Belt Review.
- Policy BDP6 – Infrastructure Contributions may seek planning obligations to mitigate the impact of development as well as a Community Infrastructure Levy (CIL) for infrastructure, facilities or services provision to support growth as required.
- Policy BDP7 – Housing Mix and Density highlights the need for 2 and 3 bed dwellings and on schemes of 10 or more dwellings a wider mix of properties may be required.
- Policy BDP8 – Affordable Housing will seek contributions for 11 or more dwellings of up to 40% affordable housing on greenfield sites or any site accommodation 200 or more dwellings; with a lower provision agreed in exceptional circumstances if it can be fully demonstrated that the required target cannot be achieved. The mix of affordable tenures that will generally be sought would comprise social rented, intermediate housing and affordable rent.

In October 2016 the parish of Catshill and North Marlbrook became a Designated Neighbourhood Area for the purposes of creating a Neighbourhood Plan. The Neighbourhood Plan steering group have undertaken public consultation, engagement with landowners, developers and promoters, and commissioned a Landscape Character and Assessment Study. It is understood that the consultation on a draft of the Neighbourhood Plan is anticipated to take place in Spring 2020.

Neighbourhood Plan

Marlbrook is part of Catshill Parish. Catshill and North Marlbrook have indicated a desire to bring forward a neighbourhood plan in the near future. The site at Marlbrook is included within the neighbourhood area boundary for Catshill & North Marlbrook.

In October 2016 the parish of Catshill and North Marlbrook became a Designated Neighbourhood Area for the purpose of creating a Neighbourhood Plan. The Neighbourhood Plan is in the early stages of development and a draft is not expected until summer 2018.

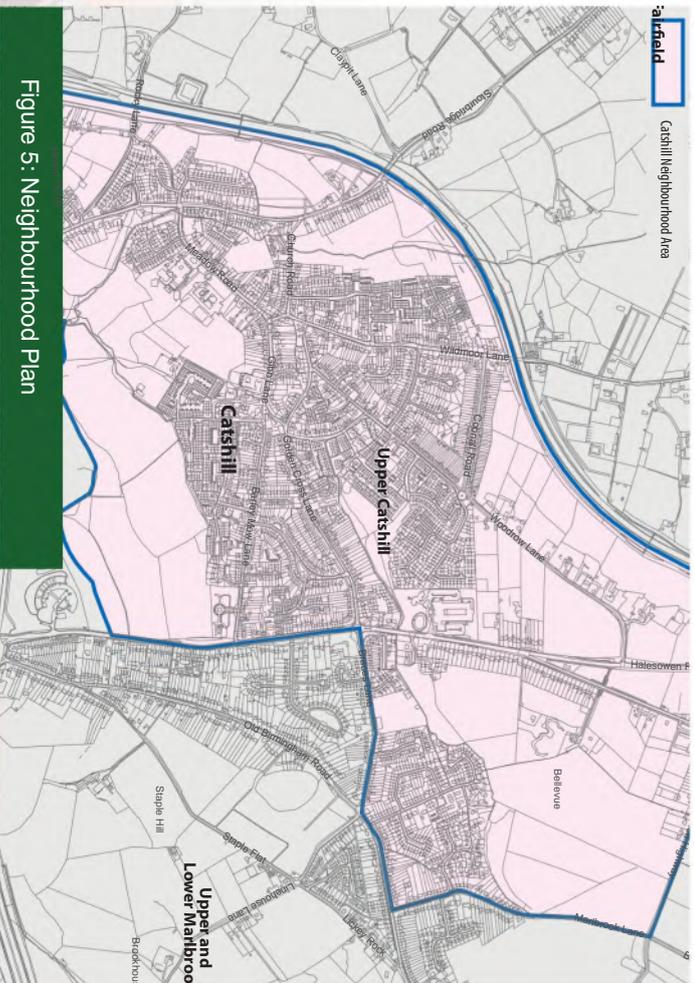


Figure 5: Neighbourhood Plan

4

**IS THERE A
NEED FOR A
GREEN BELT
DEVELOPMENT?**

Need for further Green Belt release

As detailed in the previous section, due to the limited capacity of land outside of the Green Belt, a Green Belt Review is needed to identify suitable sites to meet the housing requirement to 2040 that will be identified through the Bromsgrove Development Plan Review. The Council therefore needs to undertake a review of the most suitable locations for Green Belt release. The whole site and the southern part of the site was considered as part of the SHLAA and listed as a Green Belt potential site. RPS considers the development of the whole site being the most practical and would assist the Council in delivering the additional housing numbers required within the Green Belt in the most functional and sustainable locations.

We have considered the release of the site from the Green Belt in the context of the five purposes of Green Belt in turn:

1. To check the unrestricted sprawl of large built-up areas

Catshill and Marlbrook is not a large built-up area in the context of defining urban sprawl, although it is important to understand the relationship of the site to the settlement and surrounding area:

- To the south the site are residential dwellings and a recreational ground with further housing as part of Upper Marlbrook;
- To the east the site abuts residential properties with the northeast corner abutting an agricultural field;
- To the west the site is bound by residential dwellings that are served off Birmingham Road (A38); with this row of dwellings extending further north past the site by approximately 215 metres; and
- To the north is the property Bellevue that is surrounded by an agricultural field. Further north of this are more fields and then there are further residential dwellings and a large commercial horticulture business at the junction of Birmingham Road and Alvechurch Highway that are all part of the parish boundary.

The development of this site would not cause sprawl because it is not at the edge of the parish

boundary but is amongst an existing built-up area that is largely contained by development. Any future development would largely 'in-fill' an area of land that is for the majority contained by development; therefore having no material impact upon sprawl.

The release of the site from the Green Belt will not result in the unrestricted sprawl of North Marlbrook. Rather, it will represent the natural rounding-off of the village's southern built-up area.

2. To prevent neighbouring towns merging into one another

The site area is well contained within North Marlbrook and is not on the edge of the settlement boundary. The nearest settlements are Upper and Lower Marlbrook to the east (c.440m) and south (c.150m), and Lydiate Ash to the north (c.600m). The development of the site would not cause coalescence by merging neighbouring towns or villages.

The release of the site will not result in the merging of any neighbouring towns or settlements.

3. To assist in safeguarding the countryside from encroachment

Although it can be construed that any development in the Green Belt would lead to encroachment into the countryside, it should be highlighted that the site does not form part of the wider countryside because it is largely contained by residential properties. Views of the site are largely restricted from public vantage points by the properties binding the site to the south and west, and any views of the site from a northeast direction (where it is more open) from the PROW is towards the settlement boundary. Therefore the site does not form part of the wider countryside and any future development would have a limited visual impact upon the openness of the countryside.

The release of the site from the Green Belt will not contravene the purpose of safeguarding the countryside from encroachment.



Figure 6: Green Belt around Marlbrook & Catshill

4. To preserve the setting and special character of historic towns

The site does not form part of an historic town and is not in close proximity to the listed buildings in the area. Therefore there would be no impact.

The release of the site would have no impact upon the setting and special character of an historic town.

5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The release of the site would not prevent the recycling of derelict and other urban land because the District Plan has highlighted there is a limited supply of deliverable/developable brownfield land throughout the District to meet housing needs; hence why a Green Belt Review is required. The development of this site can be appropriately phased within the housing trajectory to respect the availability and delivery of brownfield land across the District.

The release of the site would not prejudice urban regeneration but will contribute to the delivery of housing need in a highly sustainable location.

Summary

It is apparent that the development of the site will have limited impact on the setting of the area and will not compromise the five purposes of Green Belt. The site is well contained with defensible and durable boundaries and will have an inconsequential impact upon encroachment into the countryside. It will in no way result in the merging of settlements and will not prejudice urban regeneration elsewhere in the District. As such, the site represents an appropriate Green Belt release to contribute towards housing need in the form of a sustainable development within Marlbrook.

5

**IS THE SITE
SUSTAINABLE?**



As set out in Section 2, Marlbrook benefits from excellent connectivity owing to access to Junction 4 of the M5 Motorway to the north of the settlement and Junction 1 of the M42 to the south. The A38 runs through Marlbrook that is served by a bus route between Birmingham and Bromsgrove. The 144 bus service operates between Birmingham and Worcester and passes through Marlbrook every 30 minutes. The nearest rail station is Brant Green on Fieri Hill Road and there is also the Longbridge Rail Station on Longbridge Lane. Both are served by London Midland and combined they provide a frequency of six trains per hour to Birmingham with a travel time of 20 minutes.

The parish of Catshill/Marlbrook has a population of 8551 and is identified as a “Large Settlement”. The Bromsgrove District Plan Settlement Hierarchy Background Paper (2012) identifies that the settlement is served by nursery, first, middle schools and a special school. There are also several areas of shops providing a range of services and several public houses. There are doctors, dental surgeries as well as places for worship, a village hall and a library. Recycling facilities for glass, cans, paper and card are provided at the Crown Inn and the Marlbrook public house.

Following the SHLAA Accessibility Criteria, the accessibility of the site has been calculated based on the distances to nearest amenities (as measured from the centre of the site using the proposed access via Four Oaks Drive). This accessibility assessment is shown in the table below:

Amenity	Nearest Amenity		Distance from centre of site	Walking Time
Public Transport	Marlbrook Hotel stop	Birmingham Road	450 m	6 minutes
Primary School	Catshill First School	Gibb Lane	1,300 m	16 minutes
Retail Facility	Tesco Express	Old Birmingham Rd	1,050 m	13 minutes
Health Facility	Catshill Village Surgery	Woodrow Lane	1,500 m	18 minutes

The above table shows that the site has excellent accessibility to local facilities and services. It can be seen that the site is located in a highly sustainable location, relating well to shops, schools, retails and health facilities within the village. Additionally, the site is accessible to wider centres of employment, including by rail/bus and in close proximity to the strategic road network. More detailed transport and access considerations are set out further on the next page.



Up to 150 new homes including self-build plots



Up to 40% affordable housing



2.54 hectares of public open space with a potential connection to existing children's play area and sports pitch.



Good access to public transport and local services



Up to 465 new jobs including 165 direct jobs, 121 indirect jobs and 127 induced jobs as well as 5 apprentice training opportunities



Combined household spending power of £3.95m per annum



Community Infrastructure Levy (CIL) for Bromsgrove Council once CIL charging schedule adopted



Connectivity to existing Public Right of Way network



£169,419 in Council Tax revenues



£127,444 New Homes Bonus generation

6

TECHNICAL EVIDENCE BASE

Transport Summary Note (PBA)

The site has good access (particularly by cycle) to key amenities. Furthermore, with access provided at Cottage Lane (and not just Four Oaks Drive) there will be improved access to retail facilities and other bus services.

The site has good access to several rail stations, allowing for commuter trips to key employment destinations and access to wider leisure opportunities. There are also good bus services (144) near the site which allow access to key amenities in Bromsgrove and Rubery (such as larger retail stores and banking services).

Transport modelling of the development has been undertaken that shows that the proposed site access junction from Four Oaks Drive can operate within capacity with no significant impact on the A38 Birmingham Road. Swept path analysis for both refuse vehicle and a fire tender has been undertaken that shows that the proposed site access is acceptable for both types of vehicle.

Landscape and Visual Impact Appraisal (BCA)

There are no identified landscape designations on or around the site. Any new development will be designed to successfully assimilate into the surrounding with minimal adverse residual impact; by retaining and enhancing existing boundary vegetation the development will create a more defined boundary to the Green Belt.

Views of the site are largely restricted with the main visibility coming from public footpaths on the land that rises towards the north-east, but are limited to a 1km distance. The site is therefore visually well contained.

The landscape and visual impact of the development will be localised and contained within a reasonably small area. The area the site falls within is identified as having a moderate landscape condition and low sensitivity. A landscape and visual

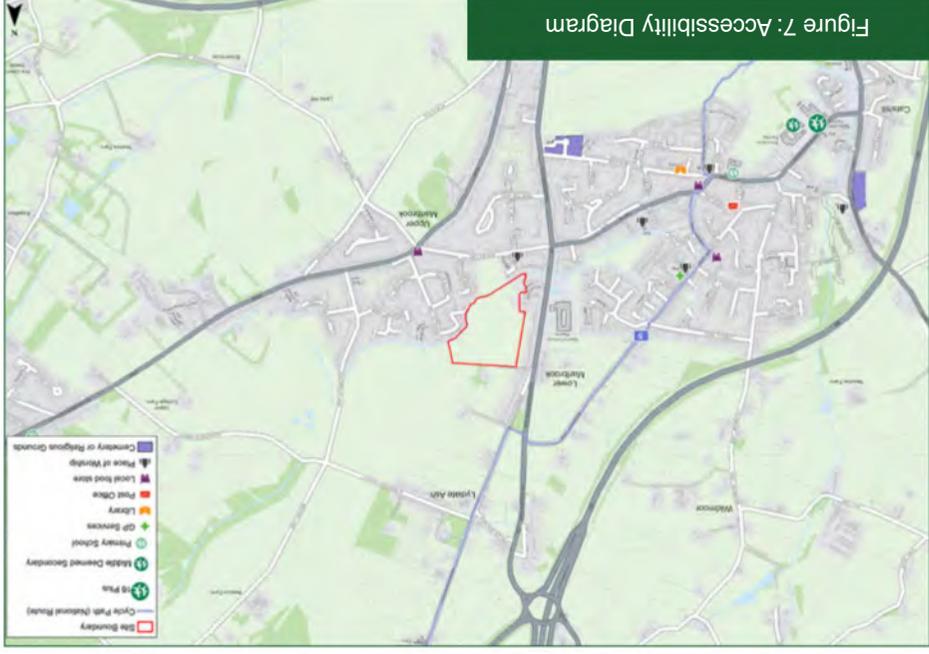


Figure 7: Accessibility Diagram

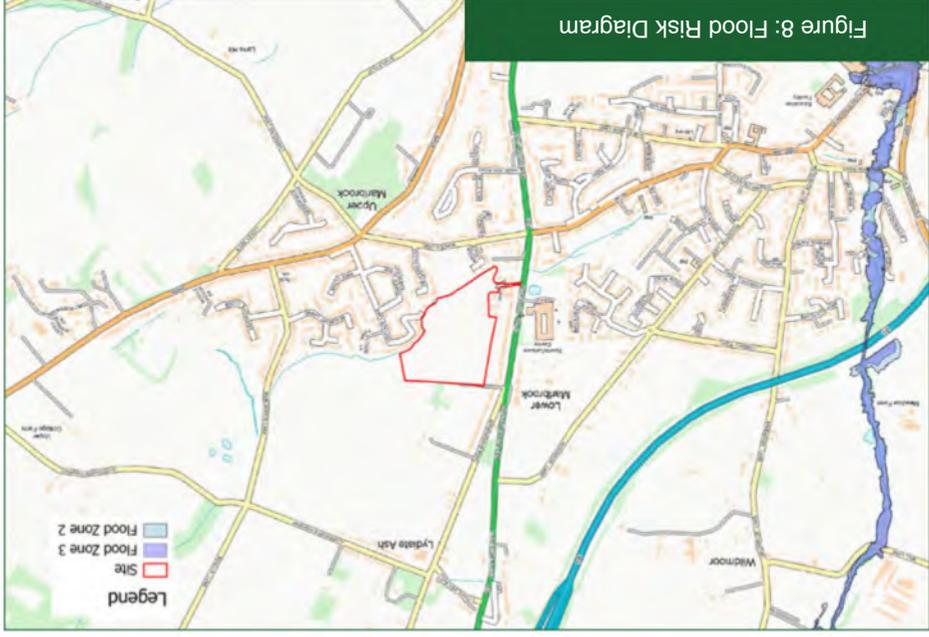


Figure 8: Flood Risk Diagram

Impact assessment has been undertaken. While some adverse impacts have been identified, they are generally minor in nature and can be suitably mitigated. The most significant adverse effect identified is on views across the recreation ground to the south of the site. This view is restricted in location and mitigation measures have been identified that will reduce the significance of this impact over time as proposed planting matures.

Careful design of the layout will ensure that any potential impacts are minimised to ensure the development will be appropriate to its location and setting.

Flood Risk & Drainage

The site is not within Flood Zones 2 or 3 and has a low probability of flooding.

Ecological Appraisal (Pearce Environment)

The site is considered to have low ecological potential. There is a pond located outside the peripheral of the site within the 250m zone of influence and an assessment was conducted as to whether it supports amphibian species and whether the pond supports amphibian species and during the terrestrial phase of their lifecycle and whether there was connectivity between the pond and the site. No evidence of amphibians or GCN was identified and the findings suggest that the road between the waterbody and the site acts as a significant barrier.

The wooden sheds were assessed for potential to support bats and nesting birds, and no evidence was found during the survey.

It is recommended that a corridor is created alongside the northern boundary of the site, extending out to 30m by setts, to prevent disturbance to badgers post-development.

No other habitat features or evidence of pertinent protected species were identified during the extended Phase 1 survey.

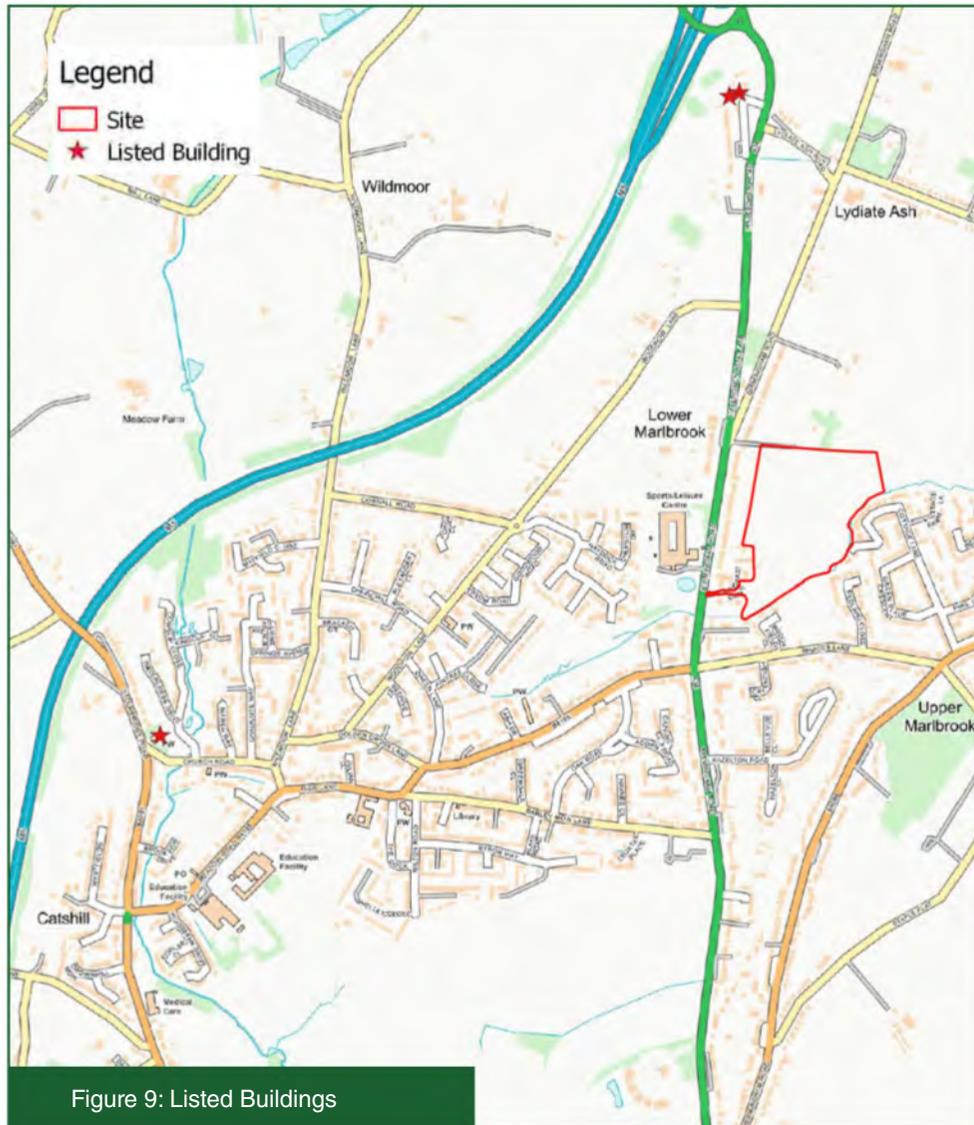
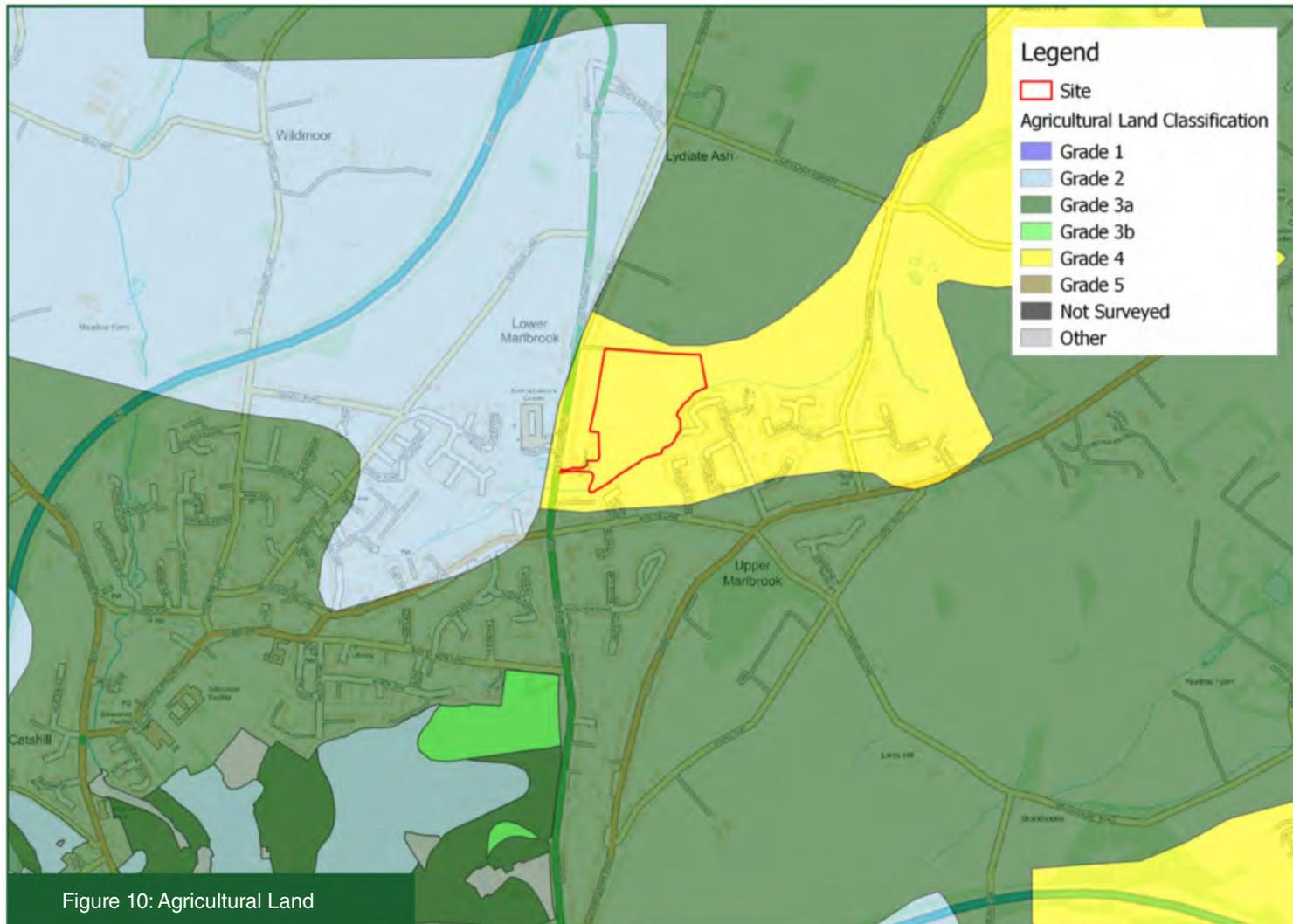


Figure 9: Listed Buildings

Cultural Heritage

There are no statutory designations in or near to the site. The site does not contain any scheduled monuments, listed buildings and does not lie within, or adjoin, a conservation area.

Figure 9 provides an extract from Magic Map identifying the location of the nearest listed buildings. There are four Grade II listed buildings in the Parish with two being to the southwest of the site, Christ Church (c.1.2km) and Catshill and North Marlbrook War Memorial (c.1.4km) and two the north, Gate Piers east of no.61 and Lydiat Ash House (both c.745m). There are no scheduled monuments in the Parish. None of the listed buildings will be impacted upon as a result of development of the land because due to their distances they are not directly visible from it.



Agricultural Land Classification

Natural England's Land Classification Map for the West Midlands Region (ALC004) shows that the site is classified as Grade 4 Agricultural Land. Grade 4 is identified as "poor quality".

Considering the site is not of good agricultural land value, its release from the Green Belt is considered appropriate and will not jeopardise farming provision in the District. Additionally the site is surrounded by "Good to Moderate" with evidence of "Very Good" land; therefore farming capacity can continue in the locale with the development of this site being the most appropriate action.

Figure 10: Agricultural Land



**THE
DEVELOPMENT
VISION AND
EMERGING
PROPOSALS**

The earlier sections of this document have explained the context of the site and why it is suitable for residential development in preparation of the future Green Belt Review. The site is in a strategic location with excellent connectivity to the M5 and M42, as well as being well served by public transport. There are public rights of way within the vicinity of the site which provide opportunities to explore the wider area on foot and there are local services in close proximity.

The illustrative masterplan below shows how a development could come forward on the site, taking into account local land forms and infrastructure. The net development area is 4.6ha and it is expected that the site can deliver around 150 dwellings. A range of house types would be delivered that reflects the needs of the locale, in line with the Council's evidence of local housing need. The range of house types would create a varied and interesting townscape that would be of high quality design, responding effectively to the context of different parts of the site.



Figure 11: Illustrative Masterplan



Open greenspace would be maintained to the south of the site where an attenuation pond would be sited, if required, for sustainable drainage. The greenspace would maintain the openness to the brook and not jeopardise the flora or fauna that benefit from this watercourse. There would also be wider greenspaces at the eastern end of the site adjacent to the agricultural fields to soften the boundaries of the development. This will relate well to where the area opens up to the northeast of the site, and would also allow continued access to the network of PROWs in the vicinity of the site. It is considered that the site can be released from the Green Belt as part of a Local Plan Review, without affecting the significance of the Green Belt and the purposes it serves.

The key features of the development are indicated below:

- Expected capacity of around 150 dwellings
- Provision for up to 40% affordable housing for local need
- Potential for self-build plots
- Provision of public open space including footpath to children's area of play
- Inclusion of on-site attenuation features

Access to the site would be off Birmingham Road (A38) where the primary area of residential development would be to the centre and western half of the site. The layout of the scheme would comprise a linear arrangement adjacent to the properties along the A38, with a more varied layout to the centre of the site that reflects the pattern of development of the housing estate to the southeast.



**A TRULY
DELIVERABLE
SITE**



Available Now

The site is promoted by Gleeson, a strategic land promoter who are committed to delivering a sustainable residential community on the site at the earliest opportunity following an appropriate allocation within the adoption of the new District Plan. There are no legal or ownership impediments which would prevent the land from being delivered for residential development. The site is, therefore, available now.

Suitable Location

Footnote 11 to paragraph 47 of the NPPF states that to be considered deliverable sites should "... offer a suitable location for development now" and the NPPG (Para. 019 Ref ID 3-019-20140306) outlines the specific factors which should be considered when assessing "suitability".

The site comprises Green Belt but the scale of housing need amounts to an exceptional circumstance to justify the release of such land and we have demonstrated (in Section 4) that the release of the land at this site will not conflict with the five purposes of Green Belt. It follows that the Green Belt designation should not be viewed as an overriding constraint to development. A Green Belt Review is in the process of being undertaken and it is worth noting that Marlbrook, as part of Catshill Parish, is already recognised as a "Large Settlement" within the District Plan's settlement hierarchy. The site was assessed within the SHLAA (BDC210) and scored well against its accessibility to local services and facilities, further highlighting its sustainability credentials.

Achievable

There are no significant constraints on site and no identified issues that would prevent development from occurring. National planning policy and guidance states that sites are achievable where they are viable and there is a reasonable prospect of housing delivery within five years. It includes a judgment about the capacity of a developer to complete the development within a certain period.

Marlbrook is a sustainable village and the site is greenfield land that will not be subject to any known major remediation or preparation costs.

The site is considered to be viable and achievable, in line with the council's local plan review.

In terms of a delivery programme, if the site were to be allocated in the Local Plan, an outline application could be submitted to the council

within the first few months of adoption and can be marketed and delivered towards the beginning of the proposed 2023 to 2040 period set out in the Bromsgrove District Plan Review Update and Further Consultation (September 2019).

In summary, the site has the potential to deliver a significant number of much-needed housing stock in the short and medium term in a sustainable location; by a leading housebuilder that is ready to deliver the development swiftly because the proposed development is viable. As such, the site is achievable.

It can be concluded that the site is available, suitable and achievable and, therefore, deliverable.

9

CONCLUSIONS & NEXT STEPS

This document has presented a vision for a sustainable housing development on land at Braces Lane, Marlbrook. It has been prepared by Gleeson who are promoting the site as a deliverable and sustainable contributor to the village, which should be enabled through its release from the Green Belt and allocated for residential development as part of the Bromsgrove Development Plan Review. Gleeson are committed to working with Bromsgrove Council and the local community to design a high-quality and sympathetic development which delivers social, environmental and economic benefits for the village.



Figure 12: Illustrative Masterplan

The Vision

The Illustrative Masterplan provides a visual illustration of how the development could come forward, taking into account local characteristics, and indicates the potential scale and mix of housing which could be accommodated having regard to the identified site opportunities and constraints.

It can be concluded that the land at Braces Lane is a sustainable and deliverable site which is appropriate for allocation through the Bromsgrove District Plan Review as a the most appropriate site in Marlbrook.

Next Steps

Gleeson will use this document to facilitate further consultation with Bromsgrove Council and the local community to refine the development vision and proposals and to inform and support appropriate representations to the Bromsgrove District Plan Review and Catshill and North Marlbrook Neighbourhood Plan.

BIRMINGHAM ROAD



Thanks for reading



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EXISTING PLAY AREA

CRES

EN

Site Ref	4	21	22	23	24	25	12
Site Address	Land off Westfields Road	Land north and east of Woodrow Lane	Land to east of Woodrow Lane	Land west of Woodrow Lane	Land west Woodrow Lane (southern section)	Land adjacent to M5 off Wildmoor Lane	Land north of Braces Lane (GSL site)
SHLAA ref	BDC96	BDC128	BDC244	BDC277	n/a	n/a	BDC210
Attribute	Brief Description	Brief Description	Brief Description	Brief Description	Brief Description	Brief Description	Brief Description
Listed Building (or impact upon)	None present	None present	None present	None present	None present	None present	None present
Nature Interest	Potential habitats for birds and mammals across site. Mitigation measures likely to be required	Possibility of some limited potential habitats for birds and mammals in hedgerow boundaries.	Potential habitats for birds and mammals across site. Mitigation measures likely to be required. Continuous and mature hedgerows present and potential for semi-natural grassland habitat	Wooded edge to M5 may provide some habitat refuge	Wooded edge to M5 may provide some habitat refuge	Possible habitats for birds and mammals and important corridor link to open land associated with new development off Church Road.	Area of unmaintained land following stream course immediately south of site likely to provide wildlife habitats
TPO	Not known. Extensive coppice to north (rear of Plough and Harrow PH) and adjacent motorway embankment. Christ Church graveyard to east with mature deciduous	None known	4	None known	None known	None known	None known
Flood Risk (and category)	Site in Flood Risk Zone 1 (low risk) but small area in NE corner of site potentially subject to surface water flooding	No known issue – Zone 3 Groundwater Protection Zone	Land to north subject to low flooding risk – no known issue with this site	Not known – potential for overland flow along Lydiate Brook course. Zone 3 Groundwater Protection Zone	Overland flow along course of Lydiate Brook running north-south towards Cobnall Road. Some historic flooding at Cobnall Road with low to medium risk of flooding	Adjacent land has been subject to flooding in past. Not known how this site was (is) affected.	None known – potential in southern edge of Marlbrook stream on the south east boundary
Rights of Way on site	Footpath 526b traverses from motorway bridge to Stourbridge Road near to the centre of the site and footpath 523b runs along southern boundary of site	None	None	PRoW crossing from Woodrow Lane to motorway boundary and along motorway boundary to footbridge on western side of M5	Public footpath crosses from Woodrow Lane to motorway in northern part of site	None	None directly affecting site
Agricultural Land Quality	Between categories 2 and 3 i.e. good quality agricultural land	Grade 2 – very good	Grade 2 – very good	Very good - Grade 2	Grade 2 – very good	Unknown	Poor - Grade 4 (may be influenced by topography)
Social or Community Value	None	None	None	None	None	None	None
Contamination/	Not known but unlikely	Not known but unlikely given long term use of site for agriculture.	Not known. Part of site may be affected where vehicles are stored	Not known but unlikely	Not known	Not known.	Not known but unlikely.
Infrastructure Issues	None known	None known	None known – potential for medium pressure gas pipeline	None known	Potential medium pressure gas main	None known	None known
Air Quality	not recorded	not recorded	not recorded	Below the Annual Mean Objective Level	not recorded	not recorded	Below the Annual Mean Objective level
Noise	not recorded	not recorded	not recorded	Lden levels – 60 – 70 dBA over 24 hour period	not recorded	not recorded	Lden levels 60 – 65 dBA over 24 hour period

Site ref	4		21		22		23		24		25		12	
Site address	Land off Westfields Road		Land north and east of Woodrow Lane		Land east of Woodrow Lane		Land west of Woodrow Lane		Land west woodrow Lane (southern section)		Land adjacent to M5 off Wildmoor Lane		Land north of Braces Lane (GSL site)	
SHLAA ref	BDC96		BDC128		BDC244		BDC277		n/a		n/a		BDC210	
Facility	Distance (metres)	Comments	Distance (metres)	Comments	Distance (metres)	Comments	Distance (metres)	Comments	Distance (metres)	Comments	Distance (metres)	Comments	Distance (metres)	Comments
Main shopping area	700		1150		850		1370		950		930		1280	
Closest mini-supermarket	700		940		880		1160		975		930		1000	
Doctor	1100		780		520		1015		600		700		1470	
Dentist	770		1245		940		1460		1040		1050		1190	
Chemist	620		1215		910		1450		1000		850		1350	
First School	1300		1360		1070		1550		1150		1080		1260	
Middle School	950		1550		1300		1800		1350		1070		1600	
Bus Stop	460		150		600		430		610		450		380	
Open Space/Recreation Area	640		880		650		1060		650		1070		200	
Footpath/ Cycle route	50		120		90		160		90		60		150	
Total distance (m) and ranking	7290	1st	9390	fifth	7810	second	11455	seventh	8415	fourth	8190	third	9880	sixth

Job Name: Marlbrook, Bromsgrove
Job No: 38227
Note No: 5507-TN003
Date: October 2020
Prepared By: Rob Pawson
Subject: **Accessibility and Access**

1 Introduction

1.1 Stantec have been instructed by Gleeson Strategic Land to provide transport planning and highways support for a residential development of 125 dwellings in Marlbrook, Bromsgrove. This Technical Note has been prepared to support further representations to the Catshill and North Marlbrook Neighbourhood Plan and includes the following:

- a review of the accessibility of the site by foot, cycle and public transport
- site access design and capacity testing
- trip generation, distribution and assignment of development traffic, and
- identification of local highway improvement schemes.

2 Accessibility

2.1 Existing Situation

2.1 The site is located in Marlbrook approximately four kilometres north of Bromsgrove town centre. The site itself is comprised of around 7.4 hectares of open fields and is bordered by housing (fronting onto Birmingham Road A38) to the west, housing to the south and southeast and open fields to the north and northeast. Access would be via Four Oaks Drive onto Birmingham Road (A38) in the southwest corner of the site. Figure 2.1 shows the site location.

2.2 Highway access is proposed onto Birmingham Road (A38). This is currently a 40 mph road, approximately eight to 10 metres in width and has street lighting. The A38 provides access to the M5 Junction 4 to the north and the M42 Junction 1 (westbound on-slip and eastbound off-slip only) to the south.

DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
38227-5507-TN003	-	30.10.20	RP	PW	-	DG

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Figure 2.1 – Site Location

2.2 Accessibility Mapping

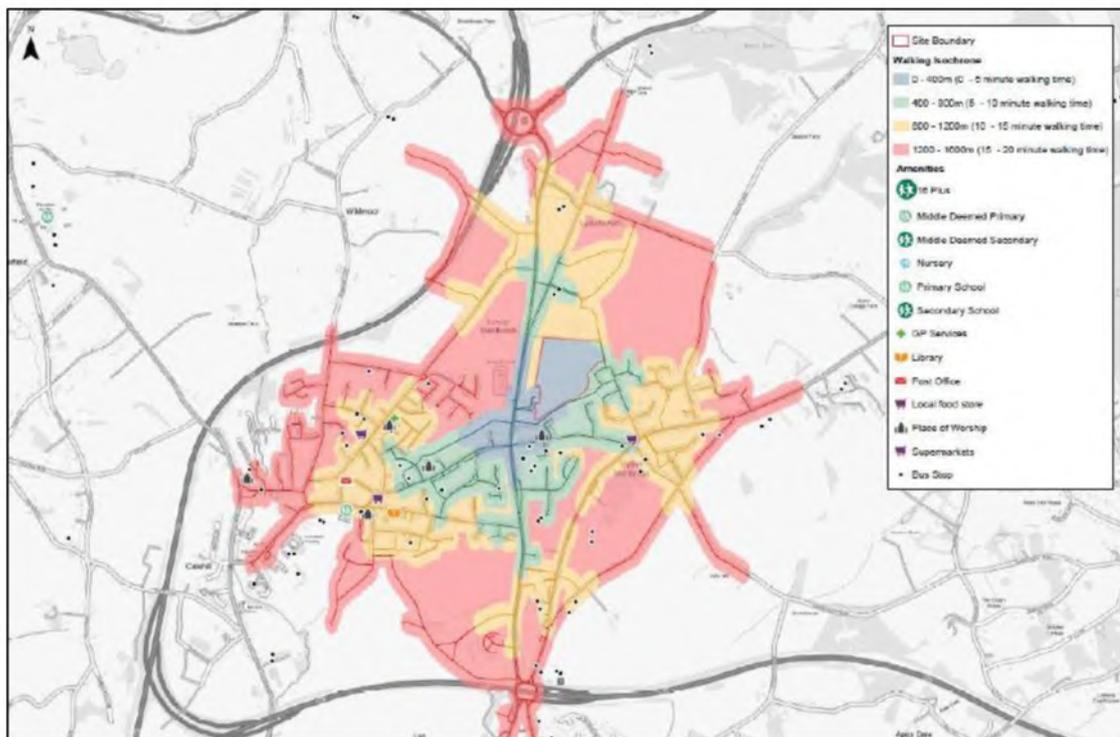
Local Amenities and Access by Foot

- 2.1 Stantec has produced a series of maps showing travel time isochrones for walking, cycling, public transport and driving using HERE data (off peak period). These provide a strong visual indicator of the accessibility of the site and help show how the site is well located to access the wider urban conurbations and core amenities that would be used by future residents of the development.
- 2.2 There are several local amenities in proximity to the site. These are shown on **Figure 2.2** with a larger scale copy provided in **Appendix A** and show that the majority of amenities are located on the western side of the A38 in Upper Catshill. **Table 2.1** highlights the key amenities in the area and their distance from the centre of the site with access via Four Oaks Drive. The walking isochrones in **Figure 2.2** show that the majority of Marlbrook and Upper Catshill are within 15 minutes walking distance of the access at Four Oaks Drive.
- 2.3 With this variety of amenities close to the site, helps to enable more of these journeys to be made by walking (and cycling) rather than short car journeys. In turn, this has a positive effect on the health and wellbeing of future residents of the site, The importance of enabling and facilitating journeys to be made by active modes of travel has been reinforced throughout this year, in response to the COVID-19 pandemic, Government funding through the Emergency

Active Travel Fund, release of LTN 1/20 with new design guidance and is also consistent with the Worcestershire County Council LTP4.

Table 2.1 – Local Amenities

Amenity	Name	Location	Distance from centre of site
Bus stop	Northbound bus stop	A38 Birmingham Road	400m
Bus stop	Southbound bus stop	A38 Birmingham Road	400m
GP Surgery	Catshill Village Surgery	Woodrow Lane	1,500 m
Primary School	Catshill First School	Gibb Lane	1,300 m
Secondary School	Catshill Middle School	Meadow Road	1,600 m
Post Office	Catshill Post Office	Golden Cross Lane	1,300 m
Food Store	Tesco Express	Old Birmingham Rd	1,050 m
Food Store	The Co-operative Food	Gibb Lane	1,150 m

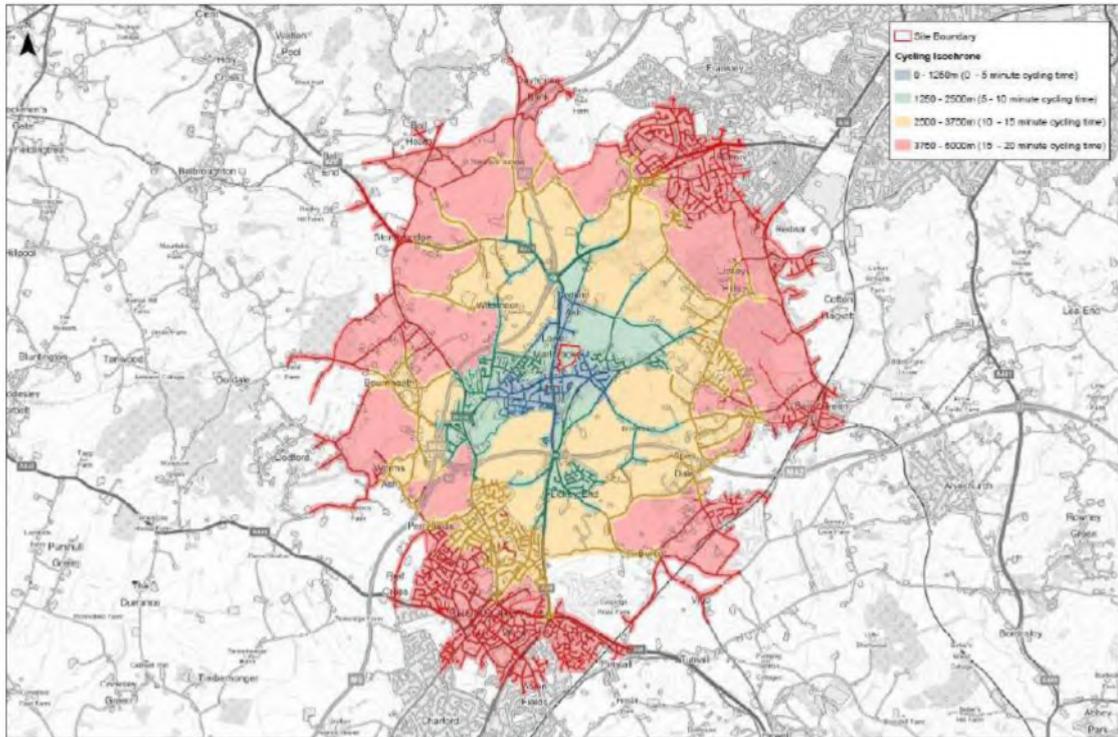


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Figure 2.2 – Local Amenities and Walk Journey Isochrones

Access by Cycle

- 2.4 **Figure 2.3** shows the cycle journey isochrones (a larger scale figure is provided in in **Appendix A**). It shows that all of Marlbrook and Catshill are within five to 10 minutes cycling distance of the access at Four Oaks Drive. It also shows that other larger local centres and services become available with parts of Bromsgrove, Rubery and Barnt Green within 20 minutes' cycle. Therefore, there are further opportunities for future residents of the site to cycle to jobs in these area as well as using the rail station at Barnt Green as part of a longer journey.

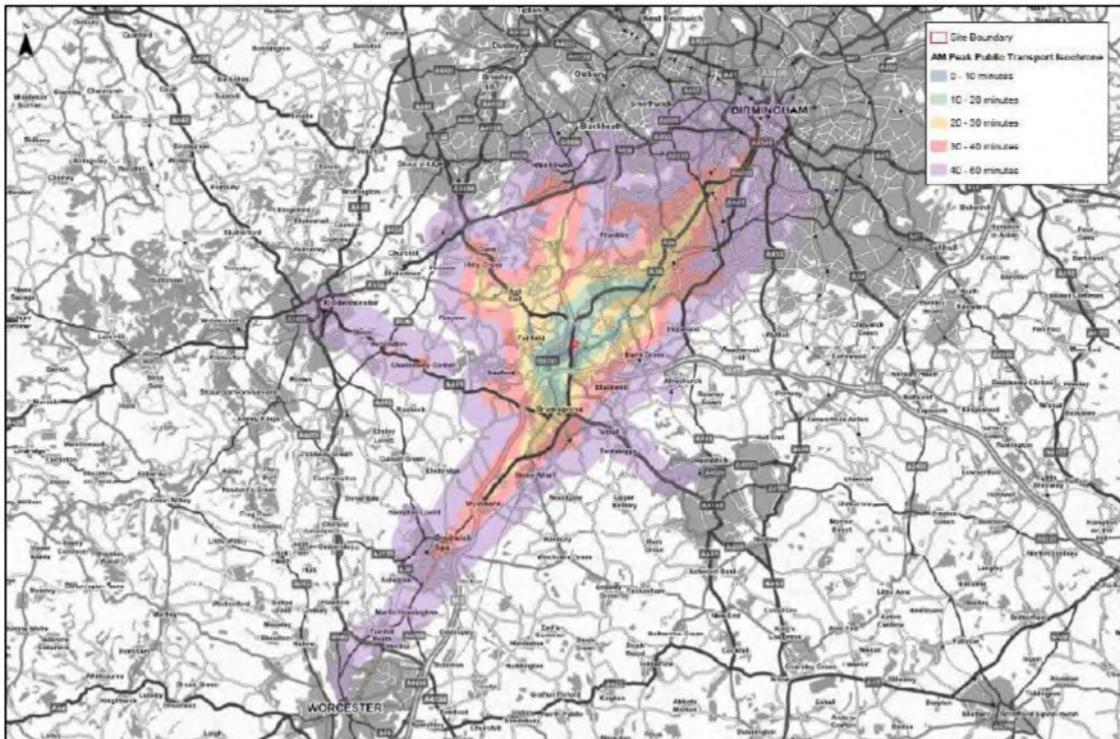


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Figure 2.3 – Cycle journey isochrones

Access by Public Transport

2.5 **Figure 2.4** shows the public transport journey isochrones (a larger scale figure is provided in **Appendix A**). It shows that the local areas of Marlbrook and Catshill are within 10 to 20 minutes' journey time and Bromsgrove is within half an hour's journey. In terms of access to wider key destinations, such as Birmingham, Worcester, Kidderminster and Redditch (where there is likely to be employment opportunities) these are within an hour's journey time by public transport.

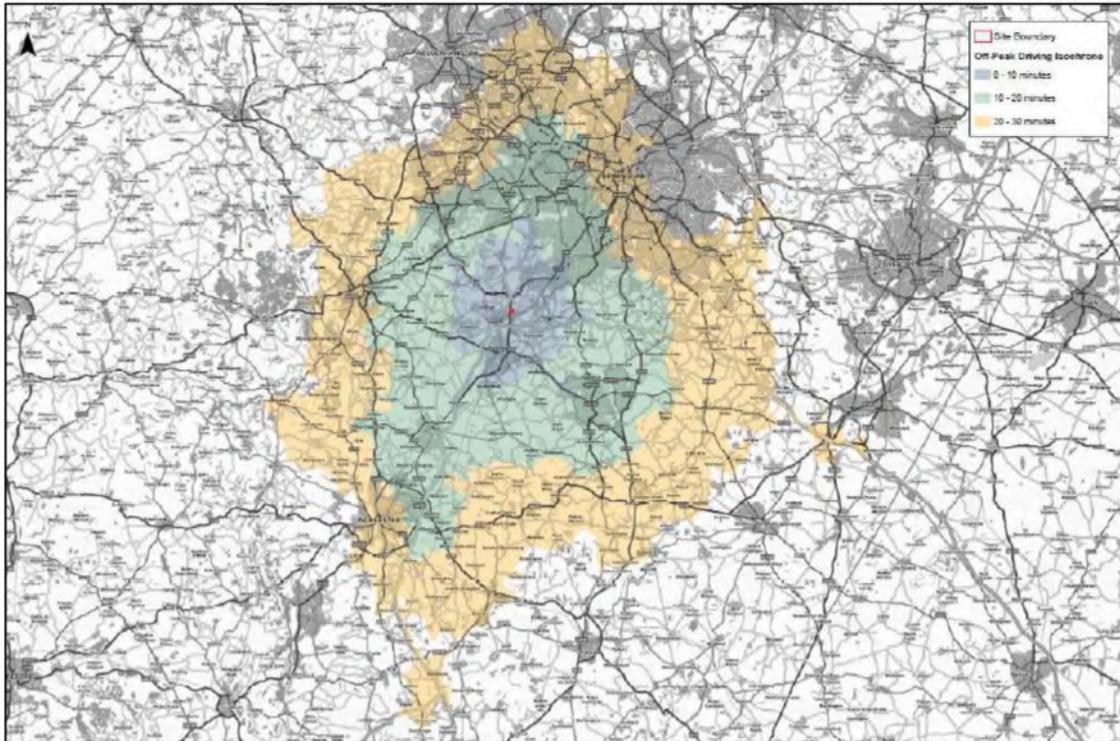


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Figure 2.4 – Public Transport journey isochrones

Access by Car

2.6 **Figure 2.5** shows the driving journey isochrones (a larger scale figure is provided in **Appendix A**). It shows that the site has good access via car to south and west Birmingham, Solihull and Worcester all of which are within half an hour drive. It also highlights the possibility to drive to local rail stations at Barnt Green, Bromsgrove and Longbridge (all within 10 minutes' drive).



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Figure 2.5 – Drive journey isochrones

2.3 Opportunities to Improve Accessibility

- 2.1 Public footpath PROW 502 (B) runs alongside the southern boundary of the site. There is opportunity to connect to this PROW at the south east corner of the site which would provide connection to Cottage Lane. Connection to Cottage Lane would improve the accessibility of the site by enabling areas in the east of Upper Marlbrook to be accessed with a shorter travel distance.
- 2.2 In particular, the connection to PROW 508 (C) would improve access to the Tesco Express and bus stops on Old Birmingham Road via Cottage Lane. The bus stops at this location are served by the 202 bus service which provides an hourly service between Bromsgrove and Halesowen (via Rednal, Rubery and Frankley).
- 2.3 There is an opportunity to improve the bus shelter facilities at the Marlbrook Hotel bus stop on Birmingham Road. The bus stop is currently a shelter, therefore, improvements could include seats and real time passenger information; the Worcestershire Passenger Transport Study includes this as one of its key objectives. Although these improvements would not directly improve accessibility to the site, improved bus stop facilities could increase uptake in bus use which could lead to service improvements which in turn would increase the accessibility of the site.

3 Site Access

- 3.1 The proposed site access (shown in **drawing number 38277-5505-001**) takes the form of a ghost island right turn junction from the A48 Birmingham Road and has been designed in accordance with Worcestershire County Council’s Streetscape Design Guide, DMRB CD123 and discussions with Worcestershire County Council.

4 Trip Generation, Distribution and Assignment

4.1 This section sets out the modelling assumptions which have been used to test the impact of traffic from the proposed development, and includes details on the trip generation, traffic growth, distribution and assignment. A future assessment year of 2030 has been used based the end of the current Local Plan period.

4.2 Trip Generation

4.1 The TRICS database version 7.5.4 was examined to derive the trip rates for the proposed development using the following assumptions:

- Land Use category 03M – Mixed Private/ Affordable Housing
- Multi-modal trip rates
- Sites in London, Ireland and Scotland were excluded, and
- Edge of Town and Neighbourhood Centre locations only were selected.

4.2 **Table 4.1** provides a summary of the person trip rates and trip generation during the weekday morning (8am to 9am) and evening (5pm to 6pm) peak hours with the full TRICS outputs provided in **Appendix B**. These trip rates do not take into account any reduction in travel due to Covid-19; although this is currently difficult to quantify, data from the first few months of the pandemic has showed an overall reduction in travel, particularly in the peak hours as commuters stagger their journey times. Therefore, the trip generation of the proposed development is likely to be lower than that presented in **Table 4.1**.

Table 4.1 – Person Trip Generation

Trip Generation	Morning Peak (8am to 9am)			Evening Peak (5pm to 6pm)		
	Inbound	Outbound	Two-way	Inbound	Outbound	Two-way
Person Trip Rates (per dwelling)	0.197	0.874	1.071	0.600	0.314	0.914
Person Trips (125 dwellings)	25	109	134	75	39	114

4.3 To identify the mode split of development trips, 2011 Census ‘Method of Travel to Work’ data has been examined. **Table 4.2** provides the mode split for the Bromsgrove 008 Middle Super Output Area (MSOA) in which the proposed development site is located.

Table 4.2 – 2011 Census Method of Travel to Work data (Bromsgrove 008 MSOA)

Travel Mode	Number of People	Percentage of People
Car Driver/ Taxi	2,924	84.4%
Car Passenger	153	4.4%
Motorcycle	13	0.4%
Train	126	3.6%
Bus	58	1.7%
Cycle	23	0.7%
Foot	155	4.5%
Other	13	0.4%
Total	3,465	100%

- 4.4 The mode split shown in **Table 4.2** has been applied to the person trip generation in **Table 4.1** with the resultant multi-modal trip generation shown in **Table 4.3** below. The resultant vehicle trips and vehicle trip rates are shown in **Table 4.4**.

Table 4.3 – Multi-Modal Trip Generation

Travel Mode	Morning Peak (8am to 9am)			Evening Peak (5pm to 6pm)		
	Inbound	Outbound	Two-way	Inbound	Outbound	Two-way
Car Driver/ Taxi	21	92	113	63	33	96
Car Passenger	1	5	6	3	2	5
Motorcycle	0	0	1	0	0	0
Train*	1	4	5	3	1	4
Bus	0	2	2	1	1	2
Cycle	0	1	1	0	0	1
Foot	1	5	6	3	2	5
Other	0	0	1	0	0	0
Total	25	109	134	75	39	114

*as the nearest rail station is located in Barnt Green, individuals must be travelling to the rail station by another mode and so have been added to the Car Driver/ Taxi trips in Table 5.4.

Table 4.4 – Vehicle Trip Generation

Trip Generation	Morning Peak (8am to 9am)			Evening Peak (5pm to 6pm)		
	Inbound	Outbound	Two-way	Inbound	Outbound	Two-way
Vehicle Trips (150 dwellings)	22	96	118	66	35	101
Vehicle Trip Rates (per dwelling)	0.173	0.769	0.943	0.528	0.276	0.805

4.3 Traffic Growth

- 4.1 To determine the traffic growth for the future assessment year of 2030, growth factors were extracted from TEMPro (version 7.2) for the weekday morning (7am to 10am) and evening

(4pm to 7pm) peak hours. Growth factors were obtained for the Bromsgrove 008 Middle Super Output Area (in which the proposed development is located) for rural principal roads, based on the site location. No further adjustments have been made for the growth in housing and jobs.

Table 4.5 – TEMPro Growth factors (Bromsgrove 008 MSOA)

	Morning Peak (8am to 9am)	Evening Peak (5pm to 6pm)
2019 – 2030	1.0543	1.0483

4.4 Trip Distribution and Assignment

4.1 The distribution of the proposed development traffic has been calculated using 2011 Census 'Journey to Work' data for the Bromsgrove 008 MSOA. The assignment of traffic has been determined based on a logical based assessment which reviews the local road network and available routes.

4.2 For this exercise, traffic has been assigned either north or south from the site access. The percentage of traffic using each route is shown in **Table 4.6**.

Table 4.6 – Distribution and Assignment

Route	Destinations	Percentage Traffic	Development Trips	
			Morning Peak	Evening Peak
North	Birmingham, Rubery, Dudley, Wychavon, Sandwell, Worcester	53%	62	53
South	Bromsgrove, Redditch, Solihull, Stratford-on-Avon, Warwick	47%	55	47

5 Junction Capacity Assessment

5.1 The proposed site access junction has been assessed using Junctions 9 software for the 2024 Base + Development scenario as discussed in **Section 5**. The results are summarised in **Table 5.1** and the full junction capacity assessment outputs are provided in **Appendix C**.

Table 5.1 – A38 Birmingham Road/ Site Access assessment summary (2030 Base + Development – 125 dwellings)

Movement	Morning Peak (8am to 9am)			Evening Peak (5pm to 6pm)		
	RFC	Queue (PCU)	Av. Delay per Arriving Veh. (s)	RFC	Queue (PCU)	Av. Delay per Arriving Veh. (s)
Access to A38 Birmingham Road S	0.19	1	18	0.05	1	12
Access to A38 Birmingham Road N	0.60	2	93	0.37	1	102
A38 Birmingham Road S to Access	0.03	0	9	0.09	1	10

5.2 The results in **Table 5.1** show that the site access junction is expected to operate within capacity in the 2024 Base + Development scenario. There is expected to be some delay for vehicles exiting the site, although this is not anticipated to result in unacceptable levels of queueing. Additionally, this is an on-site impact and the A38 Birmingham Road is not anticipated to experience any significant queueing or delay as a result of the proposed development. The proximity of the proposed access junction to the A38 Birmingham Road/ B4185 Braces Lane junction will provide opportunities for vehicles to exit the proposed development site utilising the gaps created in the traffic flow by the signal-controlled junction

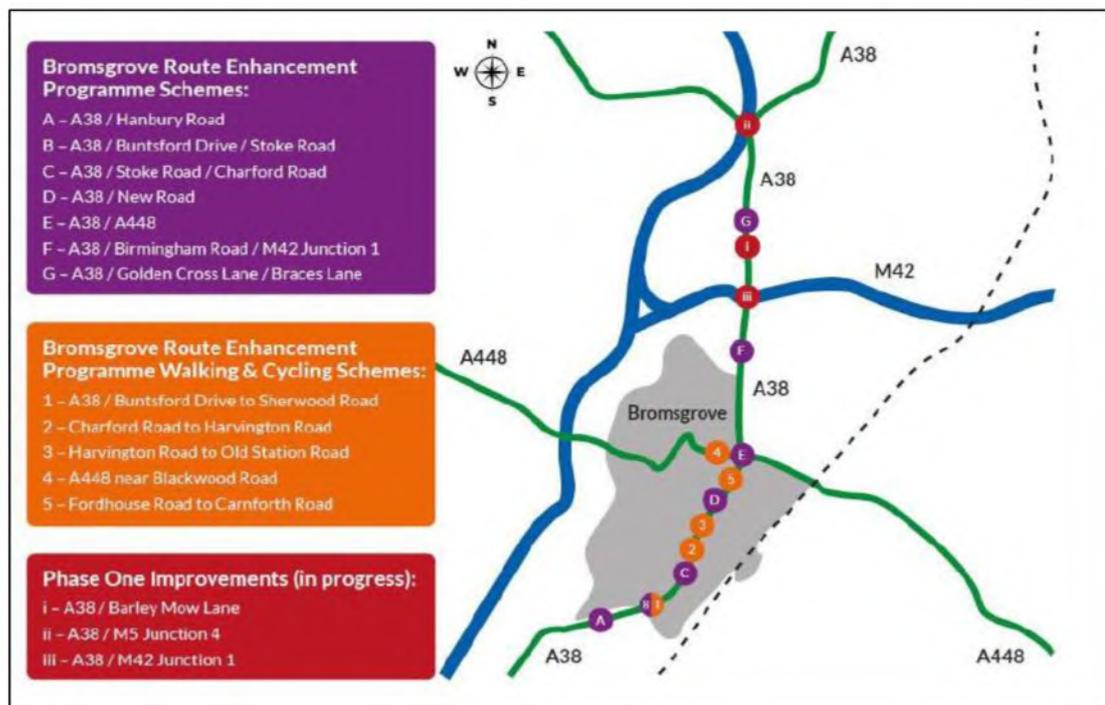
to the south. The reduction in travel due to Covid-19 must also be considered as this will reduce traffic flows on the A38 Birmingham Road, increasing the number of gaps for traffic to exit the site.

6 Local Highway Improvement Schemes

6.1 An improvement scheme has recently been completed at the A38 Birmingham Road/ Barley Mow Lane junction (approximately 500m south of the site access) which involved introducing a dedicated right turn lane for traffic turning from the A38 southbound into Barley Mow Lane. This scheme – along with improvement schemes currently under construction at M5 Junction 4 and M42 Junction 1 – are the first part of the wider A38 Bromsgrove Route Enhancement Programme (BREP) which has been awarded funding through Midlands Connect. The priorities for the overall scheme include:

- reducing congestion, increasing journey time reliability and reducing travel costs
- supporting economic and employment growth
- supporting all road users by increasing connectivity for pedestrians and cyclists, and
- supporting access to and from the M5 and M42 strategic road network (SRN).

6.2 The wider package of measures includes improvements to seven junctions (in addition to the three phase one improvement described above) and five walking and cycling improvement schemes. An overview of the scheme is shown in **Figure 6.1** below; the proposed development is located to the north east of the A38/ Golden Cross Lane/ Braces Lane junction (G).



Source: https://www.worcestershire.gov.uk/info/20679/a38_bromsgrove_improvements/2163/bomsgrove_route_enhancement_programme

Figure 6.1 – Bromsgrove Route Enhancement Programme

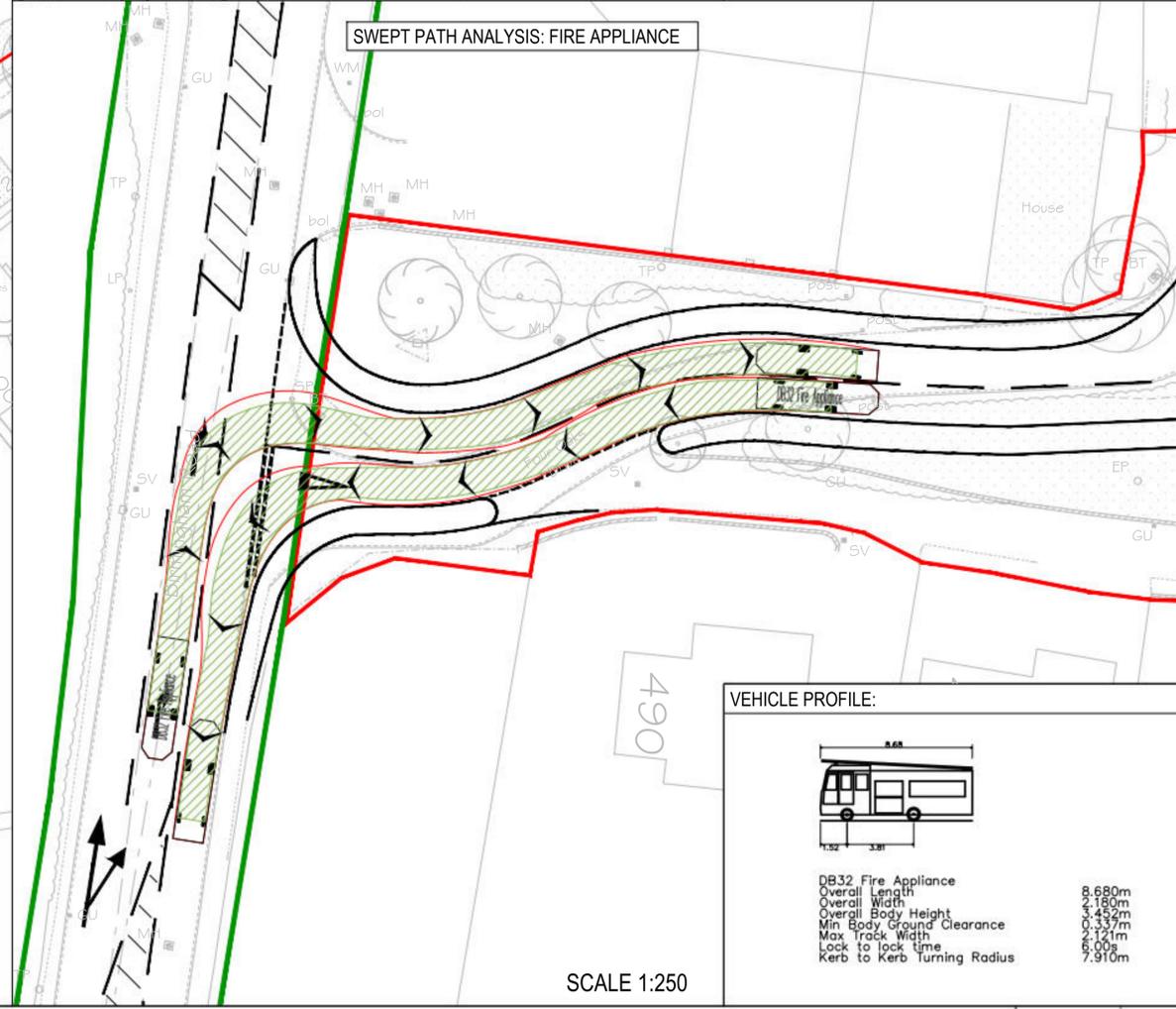
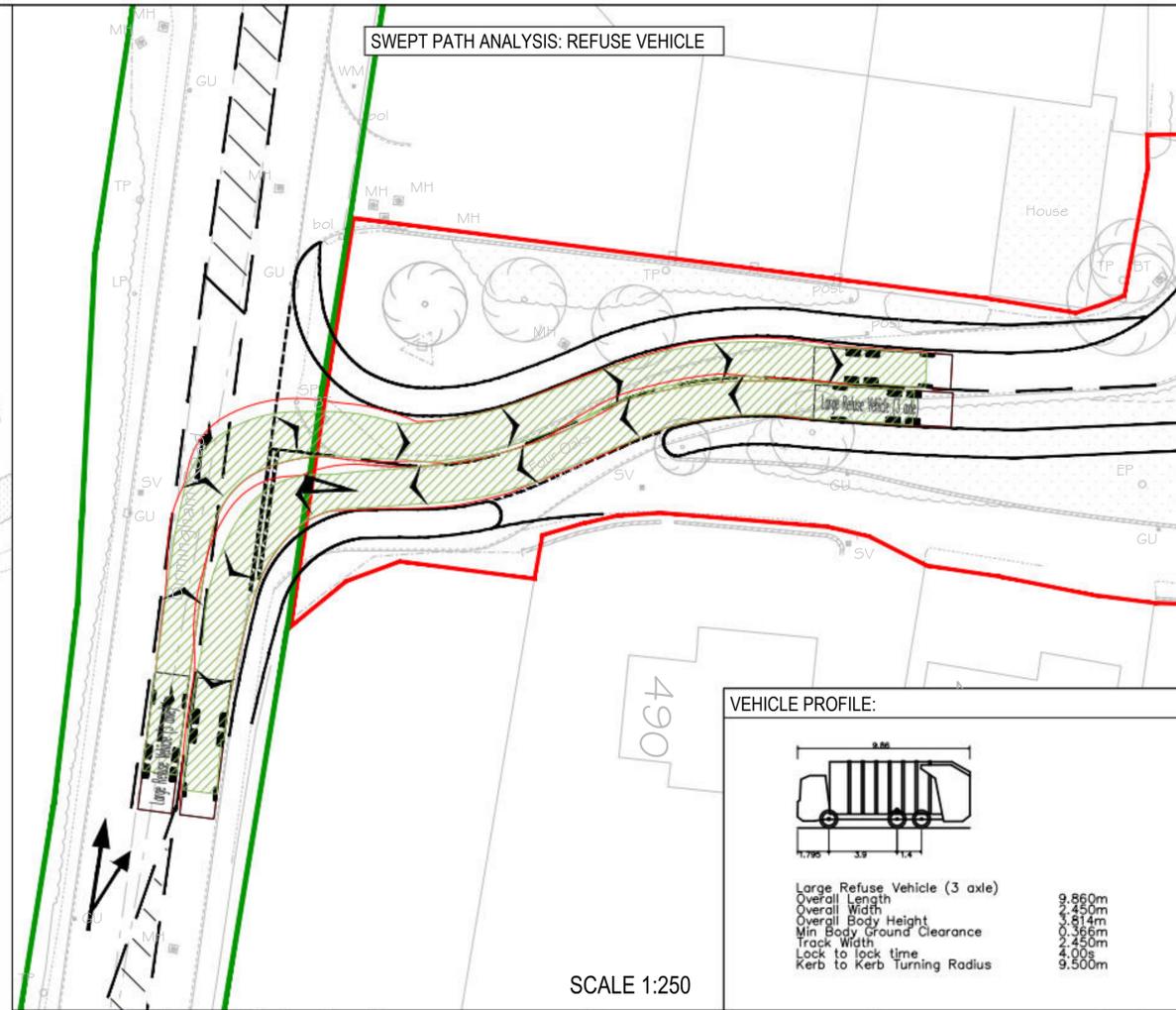
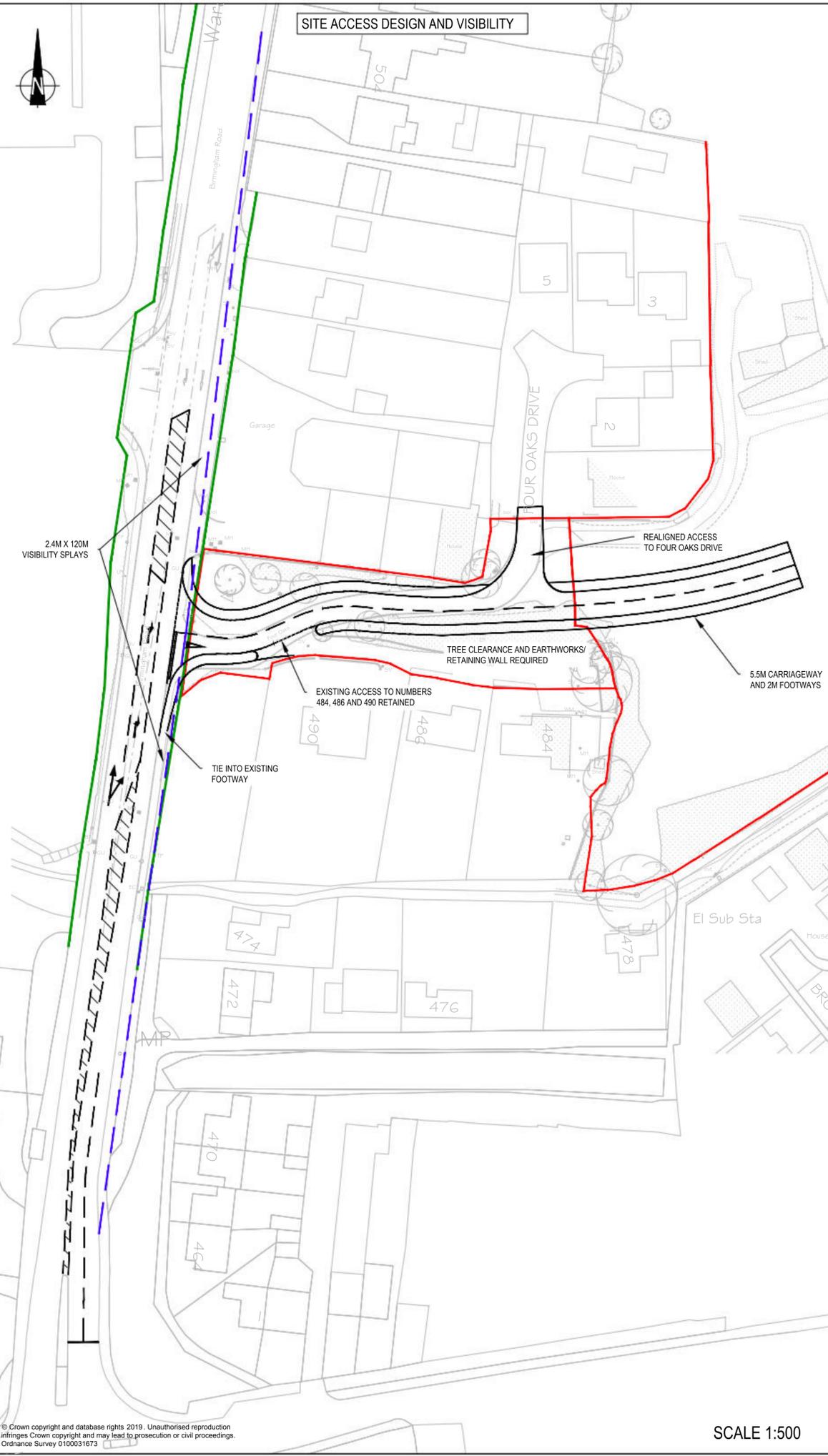
6.3 The proposed improvement scheme at the A38/ Golden Cross Lane/ Braces Lane crossroads comprises the following:

- providing two northbound and two southbound ahead lanes
- relocation of the A38 bus stops
- a new pedestrian crossing on the A38 North arm
- increased pedestrian stagger on the A38 North arm to enable a larger pedestrian refuge waiting area, and
- optimisation of signal timings to provide network control.

6.4 The Strategic Outline Business Case states that the A38 corridor is currently congested with limited capacity at key junctions (including the A38/ Golden Cross Lane/ Braces Lane crossroads), resulting in queueing and delay for drivers. The proposed improvements will reduce congestion and improve air quality for the communities and business along the corridor, facilitating economic growth by better linking Bromsgrove with major employment areas across the West Midlands. The improvements to the network will allow for development traffic from the site to be better accommodated and will enable local economic growth through providing new homes.

7 Conclusion

- 7.1 This Technical Note provides a review of the accessibility of the site and the proposed site access in terms of design and capacity. Accessibility mapping has shown the site is well located for access to local amenities by active transport modes, leading to positive health and wellbeing benefits, as well as lowering the carbon and transport impacts of delivering new homes in Marlbrook.
- 7.2 The proposed site access has been designed in accordance with national and local guidance and with reference to Worcestershire County Council's scoping advice. A junction capacity assessment has been undertaken for the proposed development of 125 dwellings which has shown that the junction would operate within capacity on this basis.
- 7.3 A package of highway improvements are to be delivered by Worcestershire County Council along the A38 corridor, including an improvement scheme at the A38/ Golden Cross Lane/ Braces Lane junction which will reduce congestion and facilitate economic growth in the area. The proposed development will benefit from this package through improved highway access and pedestrian and cycle connectivity enhancements.
- 7.4 Therefore, there are no transport reasons why this site should not be allocated in the Neighbourhood Plan.



NOTES:

- SITE BOUNDARY
- HIGHWAY BOUNDARY
- VISIBILITY SPLAY (2.4M X 120M)

Mark	Revision	Date	Drawn	Chkd	Appd

SCALING NOTE: Do not scale from this drawing. If in doubt, ask.
 UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake their own investigation where the presence of any existing sewers, services, plant or apparatus may affect their operations.

Drawing Issue Status

**LAND EAST OF BIRMINGHAM ROAD
 MARLBROOK
 PROPOSED SITE ACCESS**

Client
GLEESON DEVELOPMENTS LTD

Date of 1st Issue: 22.02.19
 Designed: RP
 Drawn: RP

A1 Scale: AS SHOWN
 Checked: -
 Approved: -

Drawing Number: **38227-5505-001**
 Revision: -

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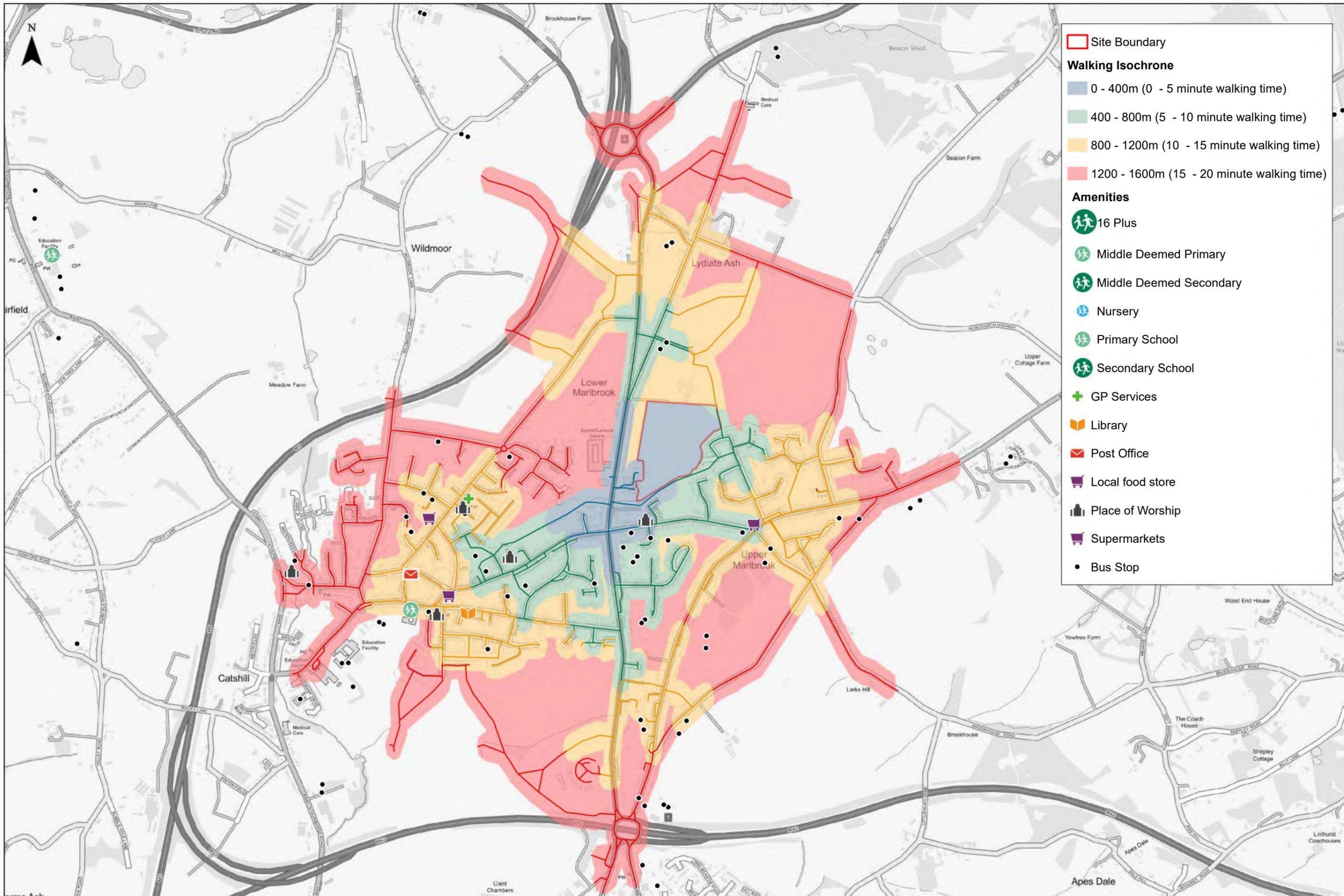
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File Location: |38227-marlbok_bromsgrove\technical\drawings\38227-5505-001.dwg

TECHNICAL NOTE



Appendix A Accessibility Mapping



Site Boundary

Walking Isochrone

- 0 - 400m (0 - 5 minute walking time)
- 400 - 800m (5 - 10 minute walking time)
- 800 - 1200m (10 - 15 minute walking time)
- 1200 - 1600m (15 - 20 minute walking time)

Amenities

- 16 Plus
- Middle Deemed Primary
- Middle Deemed Secondary
- Nursery
- Primary School
- Secondary School
- GP Services
- Library
- Post Office
- Local food store
- Place of Worship
- Supermarkets
- Bus Stop

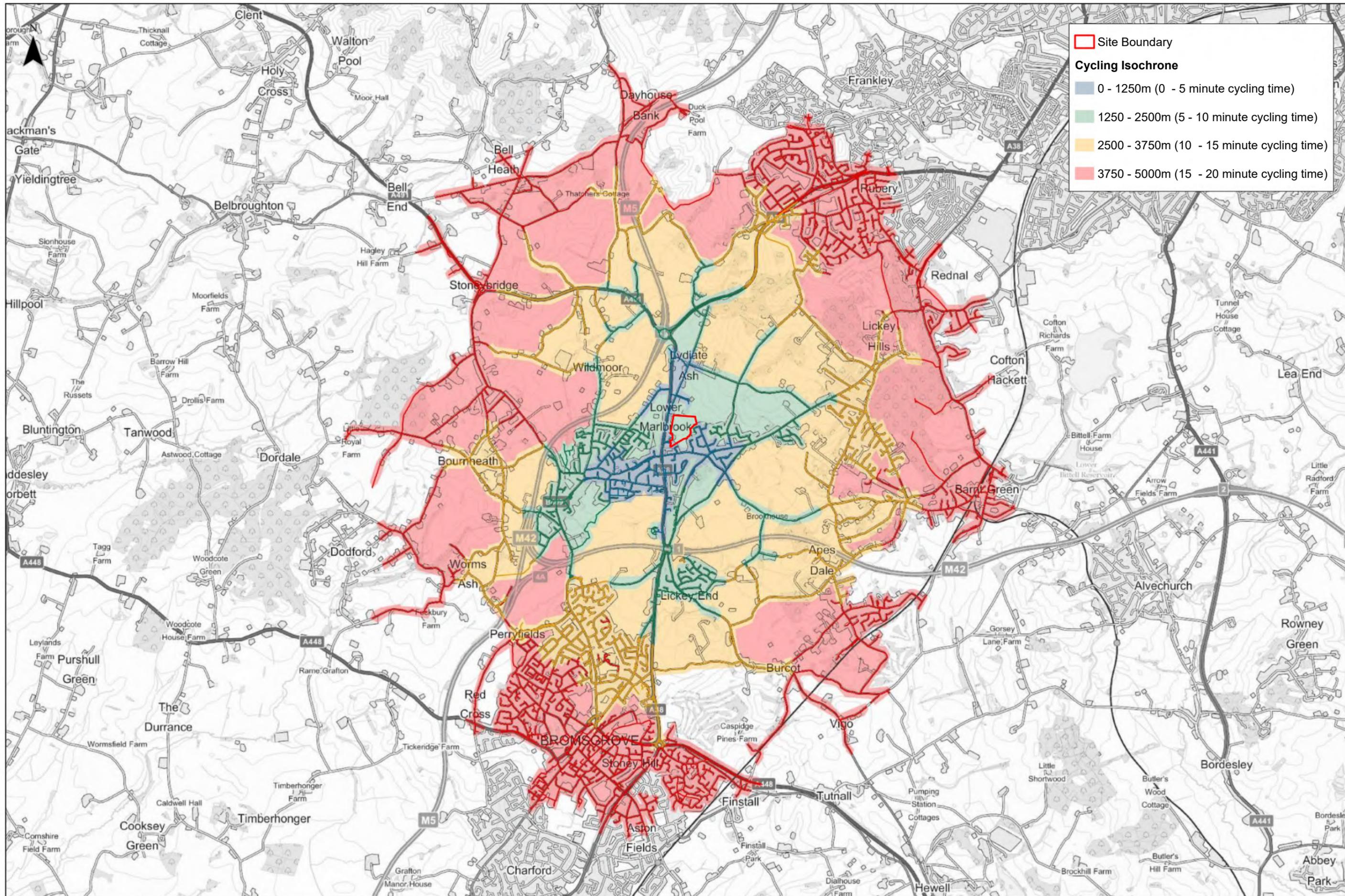


Client **MARLBROOK, BROMSGROVE**
Amenities

0 0.5 1 km

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1:12,500 @ A3	Date: 26/10/2020
Drawn: IB	Checked: RP
Figure 06	Rev A



Site Boundary

Cycling Isochrone

- 0 - 1250m (0 - 5 minute cycling time)
- 1250 - 2500m (5 - 10 minute cycling time)
- 2500 - 3750m (10 - 15 minute cycling time)
- 3750 - 5000m (15 - 20 minute cycling time)



Client

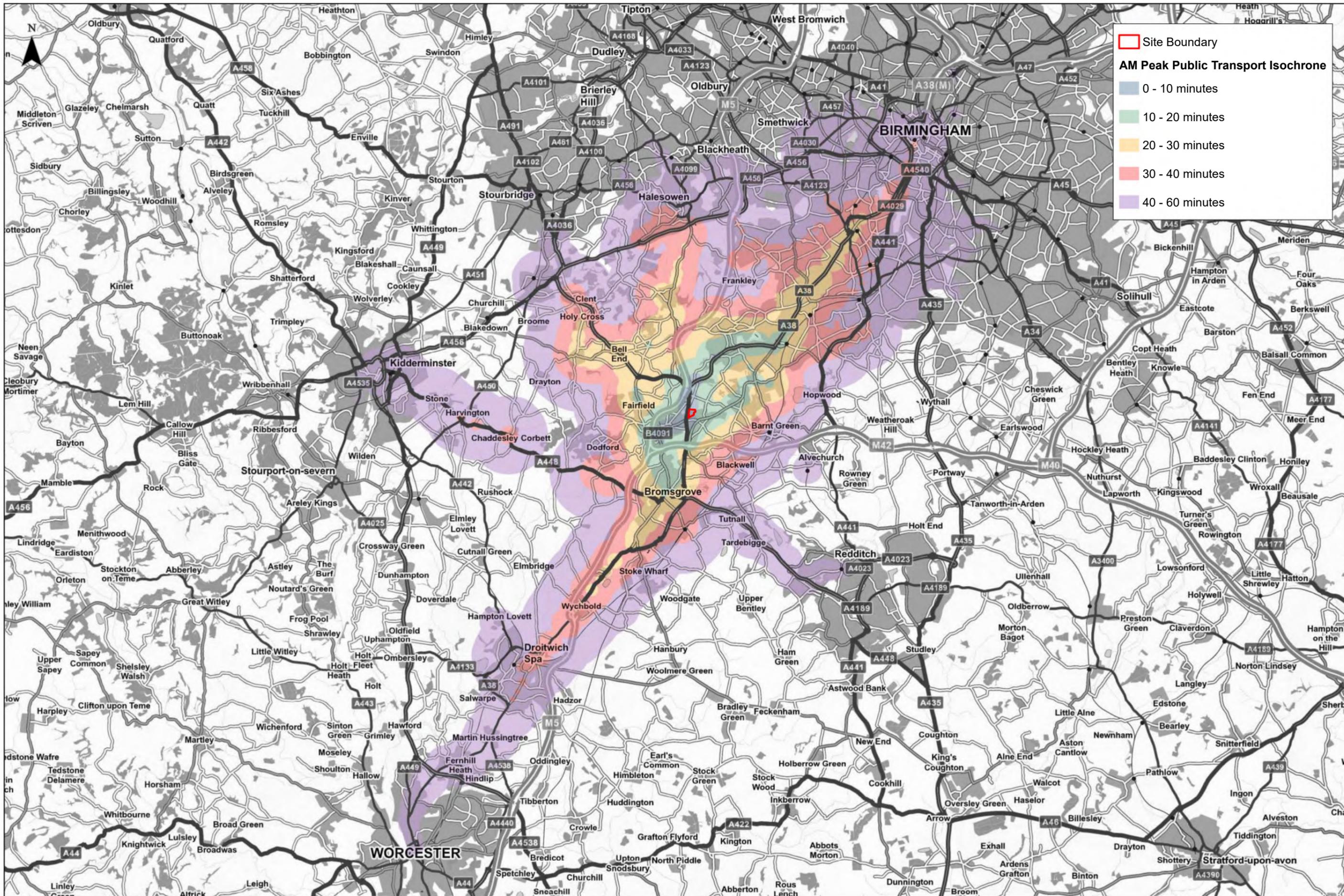
MARLBROOK, BROMSGROVE

Isochrone - Cycling

0 1 2 km

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1:40,000 @ A3	Date: 23/10/2020
Drawn: DRL	Checked: RP
Figure 03	Rev A



Site Boundary

AM Peak Public Transport Isochrone

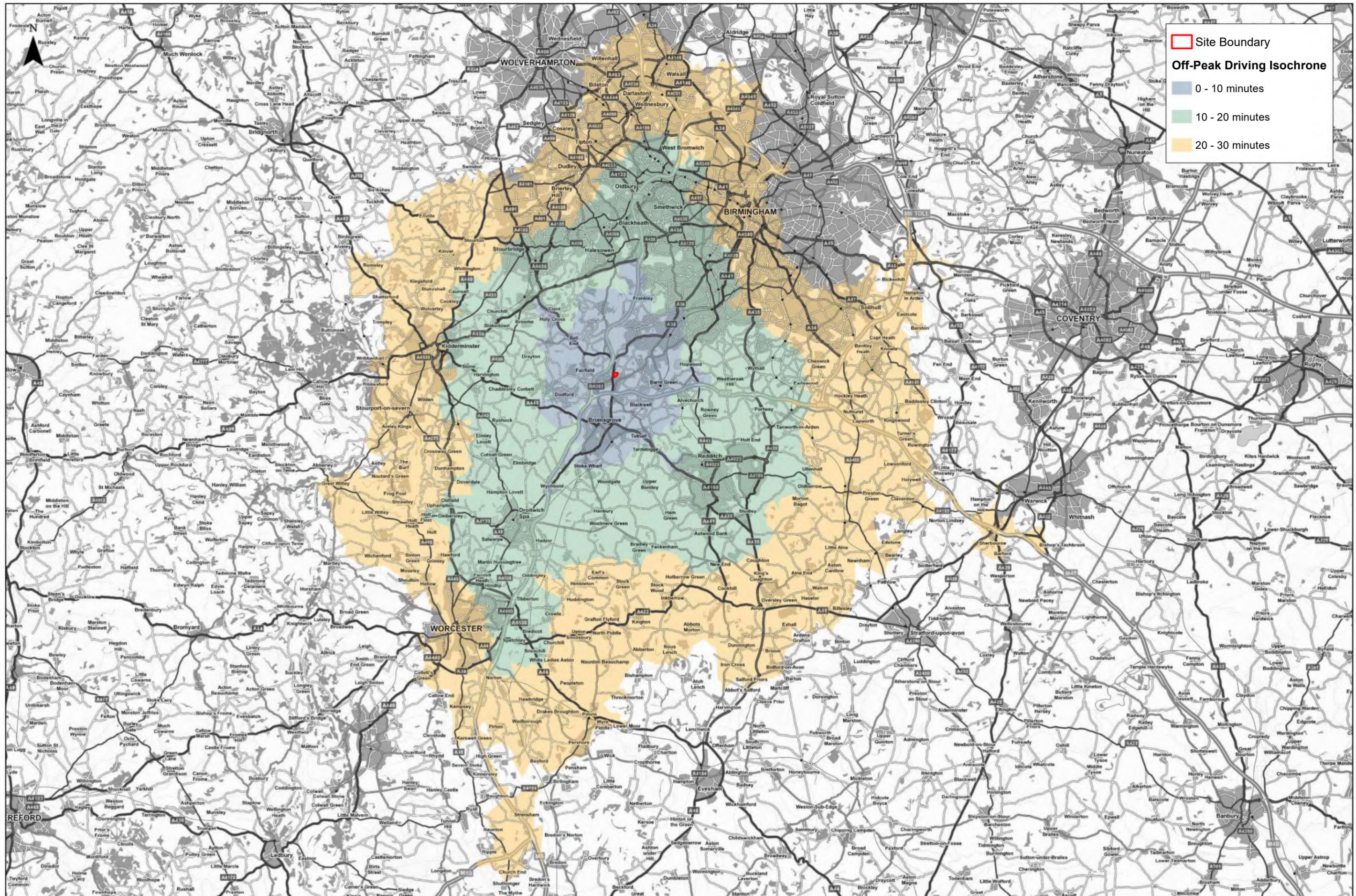
- 0 - 10 minutes
- 10 - 20 minutes
- 20 - 30 minutes
- 30 - 40 minutes
- 40 - 60 minutes



MARLBROOK, BROMSGROVE
 Isochrone - Public Transport

0 5 10 km
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1:150,000 @ A3	Date: 23/10/2020
Drawn: DRL	Checked: RP
Figure 04	Rev A



Site Boundary

Off-Peak Driving Isochrone

- 0 - 10 minutes
- 10 - 20 minutes
- 20 - 30 minutes



Client

MARLBROOK, BROMSGROVE

Isochrone - Driving

0 10 20 km

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1:260,000 @ A3	Date: 23/10/2020
Drawn: DRL	Checked: RP
Figure 05	Rev A

TECHNICAL NOTE



Appendix B TRICS Outputs

Calculation Reference: AUDIT-706706-190227-0210

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : M - MIXED PRIVATE/AFFORDABLE HOUSING
 MULTI-MODAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	8 days
	HC HAMPSHIRE	2 days
	KC KENT	1 days
	WS WEST SUSSEX	3 days
03	SOUTH WEST	
	WL WILTSHIRE	1 days
04	EAST ANGLIA	
	CA CAMBRIDGESHIRE	1 days
05	EAST MIDLANDS	
	LE LEICESTERSHIRE	1 days
08	NORTH WEST	
	MS MERSEYSIDE	2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 16 to 354 (units:)
 Range Selected by User: 9 to 354 (units:)

Parking Spaces Range: Selected: 11 to 878 Actual: 11 to 878

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/10 to 09/10/18

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Tuesday	5 days
Wednesday	4 days
Thursday	5 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	19 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town	14
Neighbourhood Centre (PPS6 Local Centre)	5

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	12
Village	5
No Sub Category	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 19 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,000 or Less	1 days
1,001 to 5,000	8 days
5,001 to 10,000	4 days
10,001 to 15,000	3 days
20,001 to 25,000	1 days
25,001 to 50,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	3 days
50,001 to 75,000	4 days
75,001 to 100,000	6 days
125,001 to 250,000	3 days
250,001 to 500,000	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	4 days
1.1 to 1.5	13 days
1.6 to 2.0	2 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	13 days
No	6 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	19 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CA-03-M-01 BANNOLD ROAD WATERBEACH	MIXED HOUSES & FLATS	CAMBRI DGESHI RE
	Edge of Town Residential Zone Total Number of dwellings:	52	
	<i>Survey date: WEDNESDAY</i>	<i>20/06/18</i>	<i>Survey Type: MANUAL</i>
2	ES-03-M-05 A26 CROWBOROUGH RD NEAR UCKFIELD FIVE ASH DOWN VILLAGE	HOUSES & FLATS	EAST SUSSEX
	Neighbourhood Centre (PPS6 Local Centre) Village Total Number of dwellings:	138	
	<i>Survey date: MONDAY</i>	<i>30/06/14</i>	<i>Survey Type: MANUAL</i>
3	ES-03-M-07 SOUTH COAST ROAD PEACEHAVEN	MIXED HOUSING	EAST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	188	
	<i>Survey date: THURSDAY</i>	<i>12/11/15</i>	<i>Survey Type: MANUAL</i>
4	ES-03-M-08 FIELD END MARESFIELD	MIXED HOUSES	EAST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	80	
	<i>Survey date: TUESDAY</i>	<i>10/05/16</i>	<i>Survey Type: MANUAL</i>
5	ES-03-M-09 STATION ROAD NORTHIAM	DETACHED/SEMI -DETACHED	EAST SUSSEX
	Neighbourhood Centre (PPS6 Local Centre) Village Total Number of dwellings:	16	
	<i>Survey date: WEDNESDAY</i>	<i>17/05/17</i>	<i>Survey Type: MANUAL</i>
6	ES-03-M-10 DITTONS ROAD POLEGATE	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	108	
	<i>Survey date: MONDAY</i>	<i>11/07/16</i>	<i>Survey Type: MANUAL</i>
7	ES-03-M-11 HEMPSTEAD LANE HAILSHAM UPPER HORSEBRIDGE	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	354	
	<i>Survey date: WEDNESDAY</i>	<i>13/07/16</i>	<i>Survey Type: MANUAL</i>
8	ES-03-M-12 PARK ROAD HAILSHAM	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town Residential Zone Total Number of dwellings:	93	
	<i>Survey date: THURSDAY</i>	<i>21/06/18</i>	<i>Survey Type: MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

9	ES-03-M-13	MIXED HOUSES	EAST SUSSEX
	NORTH COMMON ROAD WIVELSFIELD GREEN		
	Neighbourhood Centre (PPS6 Local Centre) Village		
	Total Number of dwellings:	66	
	Survey date: FRIDAY	22/06/18	Survey Type: MANUAL
10	HC-03-M-07	MIXED HOUSES & FLATS	HAMPSHIRE
	ALDERMASTON ROAD BASINGSTOKE		
	Edge of Town No Sub Category		
	Total Number of dwellings:	236	
	Survey date: TUESDAY	21/03/17	Survey Type: MANUAL
11	HC-03-M-09	MIXED HOUSES & FLATS	HAMPSHIRE
	ROMSEY ROAD WINCHESTER STANMORE		
	Edge of Town Residential Zone		
	Total Number of dwellings:	157	
	Survey date: THURSDAY	07/06/18	Survey Type: MANUAL
12	KC-03-M-02	MIXED HOUSES AND FLATS	KENT
	HERMITAGE LANE MAIDSTONE BARMING		
	Edge of Town No Sub Category		
	Total Number of dwellings:	119	
	Survey date: TUESDAY	05/06/18	Survey Type: MANUAL
13	LE-03-M-01	SEMI DETACHED	LEICESTERSHIRE
	RYDER ROAD LEICESTER BRAUNSTONE FRITH		
	Edge of Town Residential Zone		
	Total Number of dwellings:	16	
	Survey date: THURSDAY	27/09/12	Survey Type: MANUAL
14	MS-03-M-02	TERRACED	MERSEYSIDE
	LOVEL ROAD LIVERPOOL SPEKE		
	Edge of Town Residential Zone		
	Total Number of dwellings:	27	
	Survey date: FRIDAY	21/06/13	Survey Type: MANUAL
15	MS-03-M-03	SEMI DETACHED/TERRACED	MERSEYSIDE
	LOVEL ROAD LIVERPOOL SPEKE		
	Edge of Town Residential Zone		
	Total Number of dwellings:	24	
	Survey date: FRIDAY	21/06/13	Survey Type: MANUAL
16	WL-03-M-03	MIXED HOUSES & FLATS	WILTSHIRE
	WARNEFORD CRESCENT NEAR SALISBURY LONGHEDGE		
	Neighbourhood Centre (PPS6 Local Centre) Village		
	Total Number of dwellings:	260	
	Survey date: TUESDAY	09/10/18	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

17	WS-03-M-05	MIXED HOUSING	WEST SUSSEX
	ELLIS ROAD WEST HORSHAM S BROADBRIDGE HEATH Edge of Town Residential Zone Total Number of dwellings: 92 <i>Survey date: THURSDAY 23/10/14</i>		
			<i>Survey Type: MANUAL</i>
18	WS-03-M-06	SEMI DETACHED/DETACHED	WEST SUSSEX
	SOUTHFIELDS CLOSE CHICHESTER Edge of Town Residential Zone Total Number of dwellings: 67 <i>Survey date: TUESDAY 27/01/15</i>		
			<i>Survey Type: MANUAL</i>
19	WS-03-M-17	MIXED HOUSES & FLATS	WEST SUSSEX
	STANE STREET CHICHESTER WESTHAMPNETT Neighbourhood Centre (PPS6 Local Centre) Village Total Number of dwellings: 99 <i>Survey date: WEDNESDAY 03/10/18</i>		
			<i>Survey Type: MANUAL</i>

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
HC-03-M-06	removed
SC-03-M-02	removed
WS-03-M-07	removed

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
MULTI-MODAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.101	19	115	0.339	19	115	0.440
08:00 - 09:00	19	115	0.134	19	115	0.391	19	115	0.525
09:00 - 10:00	19	115	0.145	19	115	0.180	19	115	0.325
10:00 - 11:00	19	115	0.141	19	115	0.146	19	115	0.287
11:00 - 12:00	19	115	0.158	19	115	0.157	19	115	0.315
12:00 - 13:00	19	115	0.167	19	115	0.153	19	115	0.320
13:00 - 14:00	19	115	0.151	19	115	0.156	19	115	0.307
14:00 - 15:00	19	115	0.147	19	115	0.183	19	115	0.330
15:00 - 16:00	19	115	0.266	19	115	0.191	19	115	0.457
16:00 - 17:00	19	115	0.258	19	115	0.162	19	115	0.420
17:00 - 18:00	19	115	0.362	19	115	0.183	19	115	0.545
18:00 - 19:00	19	115	0.309	19	115	0.182	19	115	0.491
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.339			2.423			4.762

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	16 - 354 (units:)
Survey date date range:	01/01/10 - 09/10/18
Number of weekdays (Monday-Friday):	19
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	6
Surveys manually removed from selection:	3

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
MULTI-MODAL TAXIS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.005	19	115	0.004	19	115	0.009
08:00 - 09:00	19	115	0.009	19	115	0.012	19	115	0.021
09:00 - 10:00	19	115	0.004	19	115	0.004	19	115	0.008
10:00 - 11:00	19	115	0.002	19	115	0.002	19	115	0.004
11:00 - 12:00	19	115	0.002	19	115	0.002	19	115	0.004
12:00 - 13:00	19	115	0.001	19	115	0.001	19	115	0.002
13:00 - 14:00	19	115	0.002	19	115	0.000	19	115	0.002
14:00 - 15:00	19	115	0.000	19	115	0.000	19	115	0.000
15:00 - 16:00	19	115	0.010	19	115	0.010	19	115	0.020
16:00 - 17:00	19	115	0.004	19	115	0.001	19	115	0.005
17:00 - 18:00	19	115	0.005	19	115	0.005	19	115	0.010
18:00 - 19:00	19	115	0.004	19	115	0.004	19	115	0.008
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.048			0.045			0.093

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

MULTI-MODAL OGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.000	19	115	0.000	19	115	0.000
08:00 - 09:00	19	115	0.001	19	115	0.001	19	115	0.002
09:00 - 10:00	19	115	0.001	19	115	0.002	19	115	0.003
10:00 - 11:00	19	115	0.002	19	115	0.002	19	115	0.004
11:00 - 12:00	19	115	0.001	19	115	0.000	19	115	0.001
12:00 - 13:00	19	115	0.002	19	115	0.001	19	115	0.003
13:00 - 14:00	19	115	0.001	19	115	0.002	19	115	0.003
14:00 - 15:00	19	115	0.000	19	115	0.000	19	115	0.000
15:00 - 16:00	19	115	0.001	19	115	0.001	19	115	0.002
16:00 - 17:00	19	115	0.000	19	115	0.000	19	115	0.000
17:00 - 18:00	19	115	0.000	19	115	0.000	19	115	0.000
18:00 - 19:00	19	115	0.000	19	115	0.000	19	115	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.009			0.009			0.018

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
 MULTI-MODAL PSVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.001	19	115	0.000	19	115	0.001
08:00 - 09:00	19	115	0.000	19	115	0.000	19	115	0.000
09:00 - 10:00	19	115	0.000	19	115	0.000	19	115	0.000
10:00 - 11:00	19	115	0.000	19	115	0.000	19	115	0.000
11:00 - 12:00	19	115	0.000	19	115	0.000	19	115	0.000
12:00 - 13:00	19	115	0.000	19	115	0.000	19	115	0.000
13:00 - 14:00	19	115	0.000	19	115	0.000	19	115	0.000
14:00 - 15:00	19	115	0.000	19	115	0.000	19	115	0.000
15:00 - 16:00	19	115	0.001	19	115	0.001	19	115	0.002
16:00 - 17:00	19	115	0.000	19	115	0.000	19	115	0.000
17:00 - 18:00	19	115	0.000	19	115	0.000	19	115	0.000
18:00 - 19:00	19	115	0.000	19	115	0.000	19	115	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.002			0.001			0.003

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
 MULTI-MODAL CYCLISTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.003	19	115	0.009	19	115	0.012
08:00 - 09:00	19	115	0.003	19	115	0.010	19	115	0.013
09:00 - 10:00	19	115	0.001	19	115	0.002	19	115	0.003
10:00 - 11:00	19	115	0.001	19	115	0.002	19	115	0.003
11:00 - 12:00	19	115	0.002	19	115	0.003	19	115	0.005
12:00 - 13:00	19	115	0.004	19	115	0.005	19	115	0.009
13:00 - 14:00	19	115	0.004	19	115	0.003	19	115	0.007
14:00 - 15:00	19	115	0.003	19	115	0.002	19	115	0.005
15:00 - 16:00	19	115	0.009	19	115	0.005	19	115	0.014
16:00 - 17:00	19	115	0.009	19	115	0.010	19	115	0.019
17:00 - 18:00	19	115	0.011	19	115	0.009	19	115	0.020
18:00 - 19:00	19	115	0.006	19	115	0.005	19	115	0.011
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.056			0.065			0.121

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
MULTI-MODAL VEHICLE OCCUPANTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.111	19	115	0.458	19	115	0.569
08:00 - 09:00	19	115	0.159	19	115	0.675	19	115	0.834
09:00 - 10:00	19	115	0.175	19	115	0.231	19	115	0.406
10:00 - 11:00	19	115	0.168	19	115	0.189	19	115	0.357
11:00 - 12:00	19	115	0.198	19	115	0.211	19	115	0.409
12:00 - 13:00	19	115	0.221	19	115	0.200	19	115	0.421
13:00 - 14:00	19	115	0.194	19	115	0.201	19	115	0.395
14:00 - 15:00	19	115	0.195	19	115	0.238	19	115	0.433
15:00 - 16:00	19	115	0.460	19	115	0.264	19	115	0.724
16:00 - 17:00	19	115	0.379	19	115	0.231	19	115	0.610
17:00 - 18:00	19	115	0.499	19	115	0.252	19	115	0.751
18:00 - 19:00	19	115	0.411	19	115	0.250	19	115	0.661
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.170			3.400			6.570

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING

MULTI-MODAL PEDESTRIANS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.019	19	115	0.050	19	115	0.069
08:00 - 09:00	19	115	0.034	19	115	0.151	19	115	0.185
09:00 - 10:00	19	115	0.039	19	115	0.029	19	115	0.068
10:00 - 11:00	19	115	0.022	19	115	0.034	19	115	0.056
11:00 - 12:00	19	115	0.035	19	115	0.039	19	115	0.074
12:00 - 13:00	19	115	0.041	19	115	0.032	19	115	0.073
13:00 - 14:00	19	115	0.025	19	115	0.031	19	115	0.056
14:00 - 15:00	19	115	0.031	19	115	0.045	19	115	0.076
15:00 - 16:00	19	115	0.125	19	115	0.068	19	115	0.193
16:00 - 17:00	19	115	0.092	19	115	0.042	19	115	0.134
17:00 - 18:00	19	115	0.064	19	115	0.047	19	115	0.111
18:00 - 19:00	19	115	0.054	19	115	0.043	19	115	0.097
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.581			0.611			1.192

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
MULTI-MODAL BUS/TRAM PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.004	19	115	0.043	19	115	0.047
08:00 - 09:00	19	115	0.001	19	115	0.037	19	115	0.038
09:00 - 10:00	19	115	0.005	19	115	0.006	19	115	0.011
10:00 - 11:00	19	115	0.001	19	115	0.005	19	115	0.006
11:00 - 12:00	19	115	0.005	19	115	0.007	19	115	0.012
12:00 - 13:00	19	115	0.005	19	115	0.011	19	115	0.016
13:00 - 14:00	19	115	0.010	19	115	0.008	19	115	0.018
14:00 - 15:00	19	115	0.008	19	115	0.005	19	115	0.013
15:00 - 16:00	19	115	0.020	19	115	0.011	19	115	0.031
16:00 - 17:00	19	115	0.027	19	115	0.005	19	115	0.032
17:00 - 18:00	19	115	0.024	19	115	0.005	19	115	0.029
18:00 - 19:00	19	115	0.019	19	115	0.005	19	115	0.024
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.129			0.148			0.277

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
MULTI-MODAL TOTAL RAIL PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.000	19	115	0.002	19	115	0.002
08:00 - 09:00	19	115	0.000	19	115	0.001	19	115	0.001
09:00 - 10:00	19	115	0.000	19	115	0.000	19	115	0.000
10:00 - 11:00	19	115	0.000	19	115	0.001	19	115	0.001
11:00 - 12:00	19	115	0.000	19	115	0.001	19	115	0.001
12:00 - 13:00	19	115	0.000	19	115	0.000	19	115	0.000
13:00 - 14:00	19	115	0.000	19	115	0.000	19	115	0.000
14:00 - 15:00	19	115	0.000	19	115	0.000	19	115	0.000
15:00 - 16:00	19	115	0.001	19	115	0.000	19	115	0.001
16:00 - 17:00	19	115	0.005	19	115	0.000	19	115	0.005
17:00 - 18:00	19	115	0.002	19	115	0.001	19	115	0.003
18:00 - 19:00	19	115	0.002	19	115	0.000	19	115	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.010			0.006			0.016

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
 MULTI-MODAL COACH PASSENGERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.000	19	115	0.001	19	115	0.001
08:00 - 09:00	19	115	0.000	19	115	0.000	19	115	0.000
09:00 - 10:00	19	115	0.000	19	115	0.000	19	115	0.000
10:00 - 11:00	19	115	0.000	19	115	0.000	19	115	0.000
11:00 - 12:00	19	115	0.000	19	115	0.000	19	115	0.000
12:00 - 13:00	19	115	0.000	19	115	0.000	19	115	0.000
13:00 - 14:00	19	115	0.000	19	115	0.000	19	115	0.000
14:00 - 15:00	19	115	0.000	19	115	0.001	19	115	0.001
15:00 - 16:00	19	115	0.002	19	115	0.000	19	115	0.002
16:00 - 17:00	19	115	0.000	19	115	0.000	19	115	0.000
17:00 - 18:00	19	115	0.000	19	115	0.000	19	115	0.000
18:00 - 19:00	19	115	0.000	19	115	0.000	19	115	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.002			0.002			0.004

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.005	19	115	0.047	19	115	0.052
08:00 - 09:00	19	115	0.001	19	115	0.039	19	115	0.040
09:00 - 10:00	19	115	0.005	19	115	0.006	19	115	0.011
10:00 - 11:00	19	115	0.001	19	115	0.007	19	115	0.008
11:00 - 12:00	19	115	0.005	19	115	0.009	19	115	0.014
12:00 - 13:00	19	115	0.005	19	115	0.011	19	115	0.016
13:00 - 14:00	19	115	0.010	19	115	0.009	19	115	0.019
14:00 - 15:00	19	115	0.008	19	115	0.006	19	115	0.014
15:00 - 16:00	19	115	0.023	19	115	0.012	19	115	0.035
16:00 - 17:00	19	115	0.032	19	115	0.006	19	115	0.038
17:00 - 18:00	19	115	0.026	19	115	0.006	19	115	0.032
18:00 - 19:00	19	115	0.021	19	115	0.005	19	115	0.026
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.142			0.163			0.305

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.138	19	115	0.563	19	115	0.701
08:00 - 09:00	19	115	0.197	19	115	0.874	19	115	1.071
09:00 - 10:00	19	115	0.221	19	115	0.269	19	115	0.490
10:00 - 11:00	19	115	0.193	19	115	0.232	19	115	0.425
11:00 - 12:00	19	115	0.241	19	115	0.262	19	115	0.503
12:00 - 13:00	19	115	0.270	19	115	0.248	19	115	0.518
13:00 - 14:00	19	115	0.233	19	115	0.244	19	115	0.477
14:00 - 15:00	19	115	0.237	19	115	0.290	19	115	0.527
15:00 - 16:00	19	115	0.616	19	115	0.348	19	115	0.964
16:00 - 17:00	19	115	0.512	19	115	0.288	19	115	0.800
17:00 - 18:00	19	115	0.600	19	115	0.314	19	115	0.914
18:00 - 19:00	19	115	0.493	19	115	0.303	19	115	0.796
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.951			4.235			8.186

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/M - MIXED PRIVATE/AFFORDABLE HOUSING
 MULTI-MODAL Servicing Vehicles
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00	1	236	0.021						
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	19	115	0.003	19	115	0.001	19	115	0.004
08:00 - 09:00	19	115	0.010	19	115	0.005	19	115	0.015
09:00 - 10:00	19	115	0.013	19	115	0.013	19	115	0.026
10:00 - 11:00	19	115	0.017	19	115	0.014	19	115	0.031
11:00 - 12:00	19	115	0.010	19	115	0.013	19	115	0.023
12:00 - 13:00	19	115	0.013	19	115	0.012	19	115	0.025
13:00 - 14:00	19	115	0.010	19	115	0.013	19	115	0.023
14:00 - 15:00	19	115	0.010	19	115	0.011	19	115	0.021
15:00 - 16:00	19	115	0.009	19	115	0.008	19	115	0.017
16:00 - 17:00	19	115	0.006	19	115	0.007	19	115	0.013
17:00 - 18:00	19	115	0.004	19	115	0.005	19	115	0.009
18:00 - 19:00	19	115	0.000	19	115	0.002	19	115	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.126			0.104			0.209

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TECHNICAL NOTE



Appendix C Junction Capacity Outputs

Junctions 9
PICADY 9 - Priority Intersection Module
Version: 9.5.1.7462 © Copyright TRL Limited, 2019
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 379777 software@trl.co.uk www.trlsoftware.co.uk
The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution

Filename: Site Access Junction 201030.j9
 Path: J:\38227 - Marlbrook, Bromsgrove\Technical\Calcs\Transport\Junction Assessments
 Report generation date: 30/10/20 12:09:36

- »2030 Base + Dev, AM
- »2030 Base + Dev, PM

Summary of junction performance

	AM							PM								
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Junction LOS	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Junction LOS	Network Residual Capacity
2030 Base + Dev																
Stream B-C	D1	0.2	17.29	0.19	C	2.72	A	-13 %	D2	0.1	11.49	0.05	B	1.07	A	-14 %
Stream B-A		1.3	92.26	0.60	F					0.5	101.15	0.37	F			
Stream C-B		0.0	8.90	0.03	A					0.1	9.83	0.09	A			

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle. Junction LOS and Junction Delay are demand-weighted averages. Network Residual Capacity indicates the amount by which network flow could be increased before a user-definable threshold (see Analysis Options) is met.

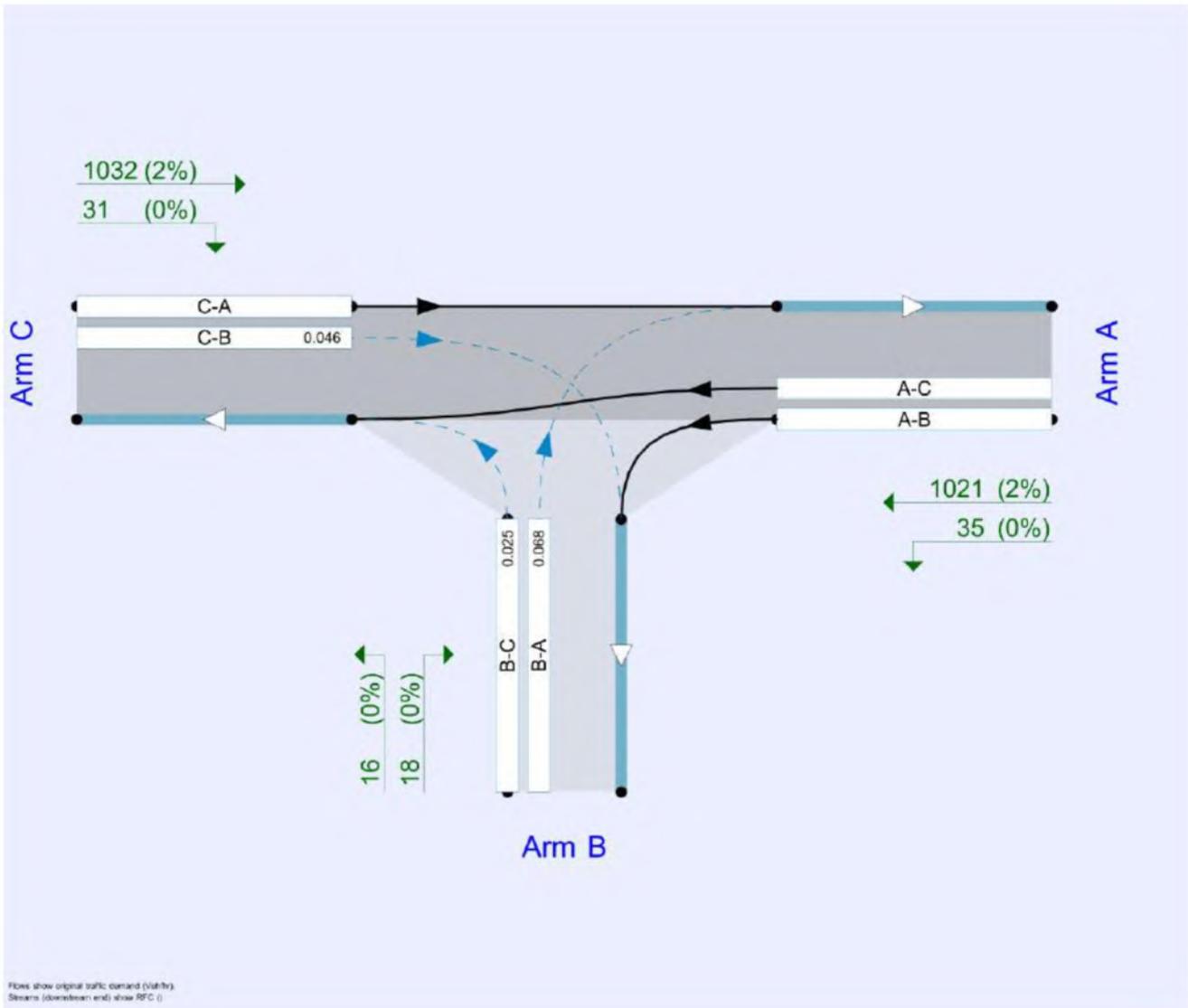
File summary

File Description

Title	A38 Birmingham Road/ Site Access
Location	Marlbrook, Bromsgrove
Site number	
Date	30/10/20
Version	
Status	Proposed
Identifier	
Client	
Jobnumber	38227
Enumerator	PBA\rpawson
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	Veh	PCU	perHour	s	-Min	perMin



Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	Residual capacity criteria type	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75			✓	Delay	0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2030 Base + Dev	AM	ONE HOUR	08:00	09:30	15	✓
D2	2030 Base + Dev	PM	ONE HOUR	17:00	18:30	15	✓

Analysis Set Details

ID	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	✓	100.000	100.000

2030 Base + Dev, AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	Arm B - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	untitled	T-Junction	Two-way		2.72	A

Junction Network Options

Driving side	Lighting	Network residual capacity (%)	First arm reaching threshold
Left	Normal/unknown	-13	Stream B-A

Arms

Arms

Arm	Name	Description	Arm type
A	A38 B'ham Rd (N)		Major
B	Four Oaks Drive		Minor
C	Brace's Lane		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Has right turn bay	Width for right turn (m)	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C	6.00		✓	3.30	150.0		-

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Width at give-way (m)	Width at 5m (m)	Width at 10m (m)	Width at 15m (m)	Width at 20m (m)	Estimate flare length	Flare length (PCU)	Visibility to left (m)	Visibility to right (m)
B	One lane plus flare	9.20	3.80	3.20	2.90	2.70	✓	1.00	21	17

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Stream	Intercept (PCU/hr)	Slope for A-B	Slope for A-C	Slope for C-A	Slope for C-B
B-A	517	0.094	0.238	0.150	0.340
B-C	719	0.110	0.278	-	-
C-B	740	0.287	0.287	-	-

The slopes and intercepts shown above do NOT include any corrections or adjustments.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2030 Base + Dev	AM	ONE HOUR	08:00	09:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (Veh/hr)	Scaling Factor (%)
A		ONE HOUR	✓	988	100.000
B		ONE HOUR	✓	96	100.000
C		ONE HOUR	✓	891	100.000

Origin-Destination Data

Demand (Veh/hr)

	To			
	A	B	C	
From	A	0	11	977
	B	51	0	45
	C	881	10	0

Vehicle Mix

Heavy Vehicle Percentages

	To			
	A	B	C	
From	A	0	0	4
	B	0	0	0
	C	4	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.19	17.29	0.2	C	41	62
B-A	0.60	92.26	1.3	F	47	70
C-A					841	1261
C-B	0.03	8.90	0.0	A	9	14
A-B					11	16
A-C					932	1399

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	34	9	482	0.071	34	0.0	0.1	8.034	A
B-A	38	10	228	0.168	38	0.0	0.2	18.817	C
C-A	690	172			690				
C-B	8	2	518	0.015	8	0.0	0.0	7.051	A
A-B	9	2			9				
A-C	765	191			765				

08:15 - 08:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	41	10	424	0.096	41	0.1	0.1	9.395	A
B-A	46	11	172	0.267	45	0.2	0.3	28.274	D
C-A	824	206			824				
C-B	9	2	475	0.019	9	0.0	0.0	7.725	A
A-B	10	3			10				
A-C	913	228			913				

08:30 - 08:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	50	12	275	0.181	49	0.1	0.2	15.890	C
B-A	56	14	94	0.599	53	0.3	1.2	82.109	F
C-A	1009	252			1009				
C-B	11	3	416	0.027	11	0.0	0.0	8.902	A
A-B	13	3			13				
A-C	1119	280			1119				

08:45 - 09:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	50	12	258	0.193	50	0.2	0.2	17.288	C
B-A	56	14	94	0.599	56	1.2	1.3	92.260	F
C-A	1009	252			1009				
C-B	11	3	416	0.027	11	0.0	0.0	8.902	A
A-B	13	3			13				
A-C	1119	280			1119				

09:00 - 09:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	41	10	415	0.098	41	0.2	0.1	9.653	A
B-A	46	11	172	0.266	50	1.3	0.4	30.190	D
C-A	824	206			824				
C-B	9	2	475	0.019	9	0.0	0.0	7.728	A
A-B	10	3			10				
A-C	913	228			913				

09:15 - 09:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	34	9	478	0.071	34	0.1	0.1	8.115	A
B-A	38	10	228	0.168	39	0.4	0.2	19.084	C
C-A	690	172			690				
C-B	8	2	518	0.015	8	0.0	0.0	7.054	A
A-B	9	2			9				
A-C	765	191			765				

2030 Base + Dev, PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	Arm B - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	untitled	T-Junction	Two-way		1.07	A

Junction Network Options

Driving side	Lighting	Network residual capacity (%)	First arm reaching threshold
Left	Normal/unknown	-14	Stream B-A

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D2	2030 Base + Dev	PM	ONE HOUR	17:00	18:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (Veh/hr)	Scaling Factor (%)
A		ONE HOUR	✓	1056	100.000
B		ONE HOUR	✓	35	100.000
C		ONE HOUR	✓	1063	100.000

Origin-Destination Data

Demand (Veh/hr)

		To		
		A	B	C
From	A	0	35	1021
	B	18	0	16
	C	1032	31	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	2
	B	0	0	0
	C	2	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.05	11.49	0.1	B	15	22
B-A	0.37	101.15	0.5	F	17	25
C-A					966	1449
C-B	0.09	9.83	0.1	A	28	43
A-B					32	48
A-C					956	1433

Main Results for each time segment

17:00 - 17:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	3	489	0.025	12	0.0	0.0	7.548	A
B-A	14	3	201	0.068	13	0.0	0.1	19.133	C
C-A	792	198			792				
C-B	23	6	508	0.046	23	0.0	0.0	7.425	A
A-B	26	7			26				
A-C	784	196			784				

17:15 - 17:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	15	4	439	0.033	15	0.0	0.0	8.474	A
B-A	16	4	140	0.118	16	0.1	0.1	29.019	D
C-A	946	237			946				
C-B	28	7	463	0.060	28	0.0	0.1	8.281	A
A-B	31	8			31				
A-C	936	234			936				

17:30 - 17:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	18	4	340	0.053	18	0.0	0.1	11.171	B
B-A	20	5	55	0.365	19	0.1	0.5	95.373	F
C-A	1159	290			1159				
C-B	34	9	400	0.085	34	0.1	0.1	9.829	A
A-B	39	10			39				
A-C	1147	287			1147				

17:45 - 18:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	18	4	331	0.054	18	0.1	0.1	11.488	B
B-A	20	5	55	0.365	20	0.5	0.5	101.146	F
C-A	1159	290			1159				
C-B	34	9	400	0.085	34	0.1	0.1	9.835	A
A-B	39	10			39				
A-C	1147	287			1147				

18:00 - 18:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	15	4	434	0.034	15	0.1	0.0	8.592	A
B-A	16	4	140	0.117	18	0.5	0.1	29.788	D
C-A	946	237			946				
C-B	28	7	463	0.060	28	0.1	0.1	8.286	A
A-B	31	8			31				
A-C	936	234			936				

18:15 - 18:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	3	486	0.025	12	0.0	0.0	7.602	A
B-A	14	3	202	0.068	14	0.1	0.1	19.224	C
C-A	792	198			792				
C-B	23	6	508	0.046	23	0.1	0.0	7.435	A
A-B	26	7			26				
A-C	784	196			784				

Your ref:

Our ref: 38227/5501/201030

Date: 30th October 2020

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Dear Sir/ Madam

RE: Land East of A38 Birmingham Road, Marlbrook

Stantec are appointed by Gleeson Strategic Land to provide transport planning and highways support for a residential development of 125 dwellings in Marlbrook, Bromsgrove.

A pre-application meeting was held on 16 May 2019, between Stephen Hawley (at that time working for Worcestershire County Council - WCC), Brian Egerton (from Hawksmoor) and Philip Lines (from Stantec, then Peter Brett Associates). The meeting discussed the principles of the development with a focus on how the site might be accessed.

This letter seeks to summarise the matters agreed relating to the site access principles to land off the A38 Birmingham Road at that time with WCC. This will assist the discussions with the Parish Council over the emerging Neighbourhood Plan.

The site is located east of the A38 Birmingham Road with an existing access off Four Oaks Drive. The development will see this access extended to serve an additional 125 dwellings (which has reduced from the 150 dwellings discussed in May 2019), as shown in the illustrative masterplan ref. 7888-L-04 rev D held in **Appendix A**.

The site will be served by a right-turn lane arrangement at the A38 Birmingham Road frontage (subject to a 40mph speed limit), as depicted in drawing 38227/5505/001 (held in **Appendix B**) which will be designed in accordance with your Council's updated (2020) Streetscape Design Guide and the also updated DMRB guidance (CD123 Geometric design of at-grade priority and signal-controlled junctions).

The access will have a 3.2m wide right-turn lane over 110m, and junction capacity assessments were completed for (the then) 150 homes which demonstrated that the proposed access would accommodate the anticipated future traffic volumes in 2024 with the development. The scheme has now been reduced to 125 homes and so adds further comfort that the access will have sufficient capacity but with the horizon year updated to reflect the anticipated planning date.

Primarily, we note WCC's agreement in principle to this layout in May 2019 and that the design will be subject to detailed design considerations, including a Road Safety Audit at the appropriate stage in the planning process. Additionally, scoping with Highways England will take place in due course, although this does not affect the principle of access being agreed.

Additional to the agreement in principle to the design, we note the following agreement and matters discussed at the May 2019 meeting:

- as the access will not be used by buses and will infrequently be used by large vehicles (e.g. only for refuse collections and emergency vehicles), it is considered appropriate to provide a 5.5m carriageway

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Registered in England No. 1188070

- 2m wide footways should be provided on both sides, subject to detailed design considerations and additional discussions with your Council (noting that ideally, a continuous footway will be provided adjacent the private drive to 484, 486 and 490 subject to the topographical constraints to the southern edge of the access road). We are aware that the ownership and access rights are private, so any alterations remains a developer's matter to manage. Similarly, the same applies for Four Oaks Drive. This is likely to become a new 'T' junction off the proposed site access road.
- the minor encroachment of the diverging taper into the two-lane approach to the A38 Birmingham Road/ B4185 Braces Lane crossroads has been incorporated into the existing hatching on the approach to the junction and raised no concerns in light of a new right-hand turn lane being built at the crossroads
- the road gradients will need to achieve adoptable standards; 1:20 is normally the maximum gradient, although this could be potentially steeper to 1:15, to be informed by the topographical survey. It was agreed a longitudinal section drawing would be prepared and submitted for comment – this has been prepared and drawing 38227/2001/101 is held in Appendix B
- the Traffic Management Officer raised no particular concerns and the Road Adoption Officer asked that the site access visibility splays will need consideration (at the detailed design)
- whilst WCC did not have an express requirement for a secondary or emergency access, this should be discussed with the Fire Officer ahead of final permissions.

Hopefully the content of this letter matches your Council's understanding of matters discussed and agreed at the 16 May 2019 pre-application meeting and provides your Council's approval in principle to a site access off the A38 Birmingham Road to serve 125 new homes at Marlbrook and thus, access itself will not be valid a reason for the site not to be allocated in the Neighbourhood Plan.

Yours sincerely

Pete Wearing
Principal Transport Consultant

For and on behalf of
Stantec UK Ltd

Enclosures:

- Appendix A – Illustrative Masterplan
- Appendix B – Access Drawings

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-  Site Boundary (7.44ha)
-  Potential Vehicular Access
-  Proposed Dwellings (125 dwellings @ 31dph) (4.00ha)
-  Public Open Space (3.44ha)
- To include:
 -  Potential Attenuation Ponds
 -  Proposed Main Vehicular Route
 -  Proposed Secondary Vehicular Route
 -  Proposed Private Drives
 -  Proposed Buffer Planting
 -  Proposed Trees
 -  Existing Trees/Hedgerows
 -  Potential Footpath Connections into Site
 -  Potential Local Green Area
 -  Green Corridor along Watercourse



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Gleeson Strategic Land
 Marlbrook
 Bromsgrove

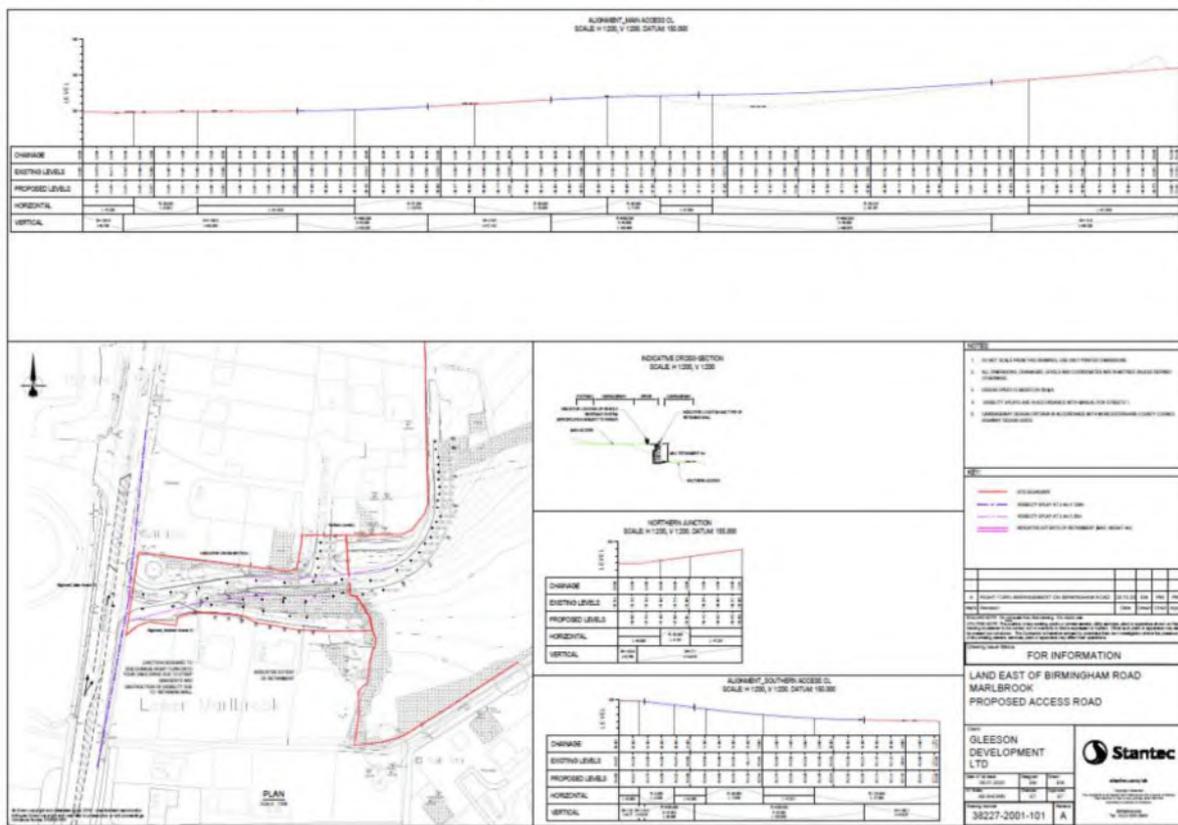
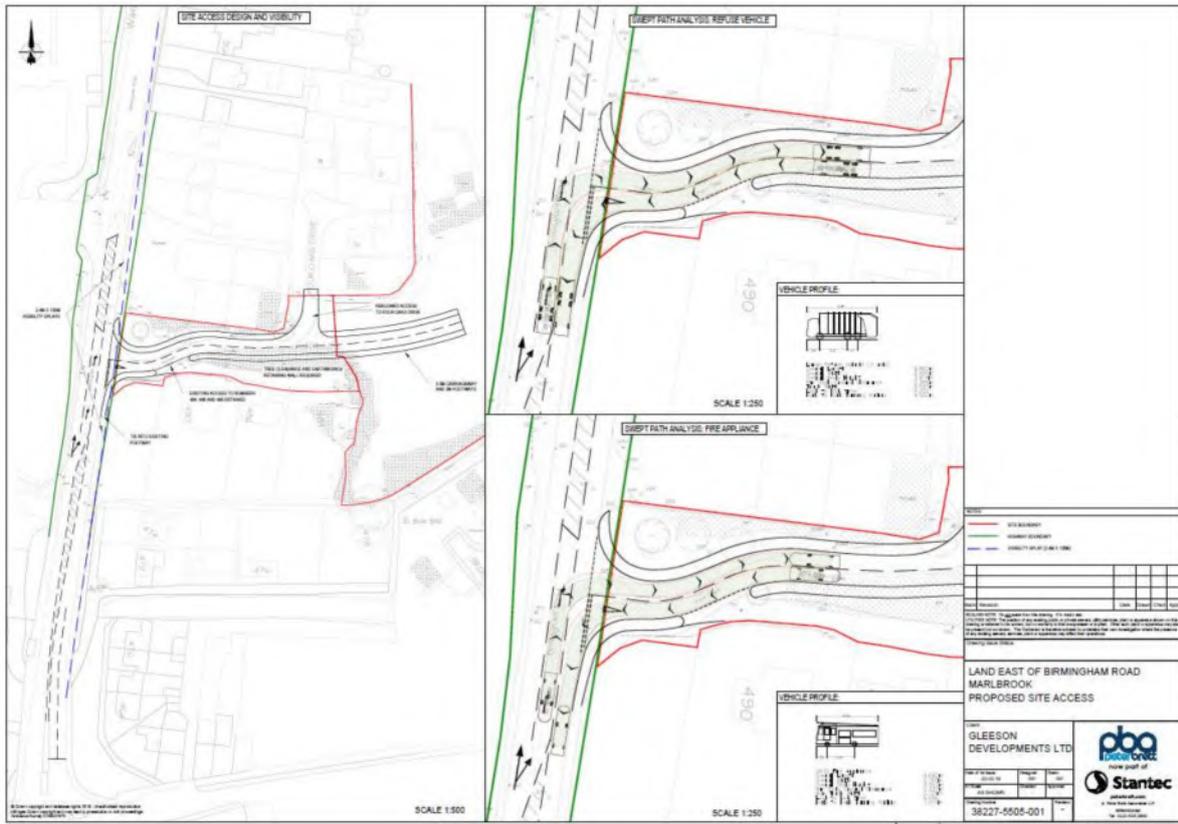
ILLUSTRATIVE MASTERPLAN

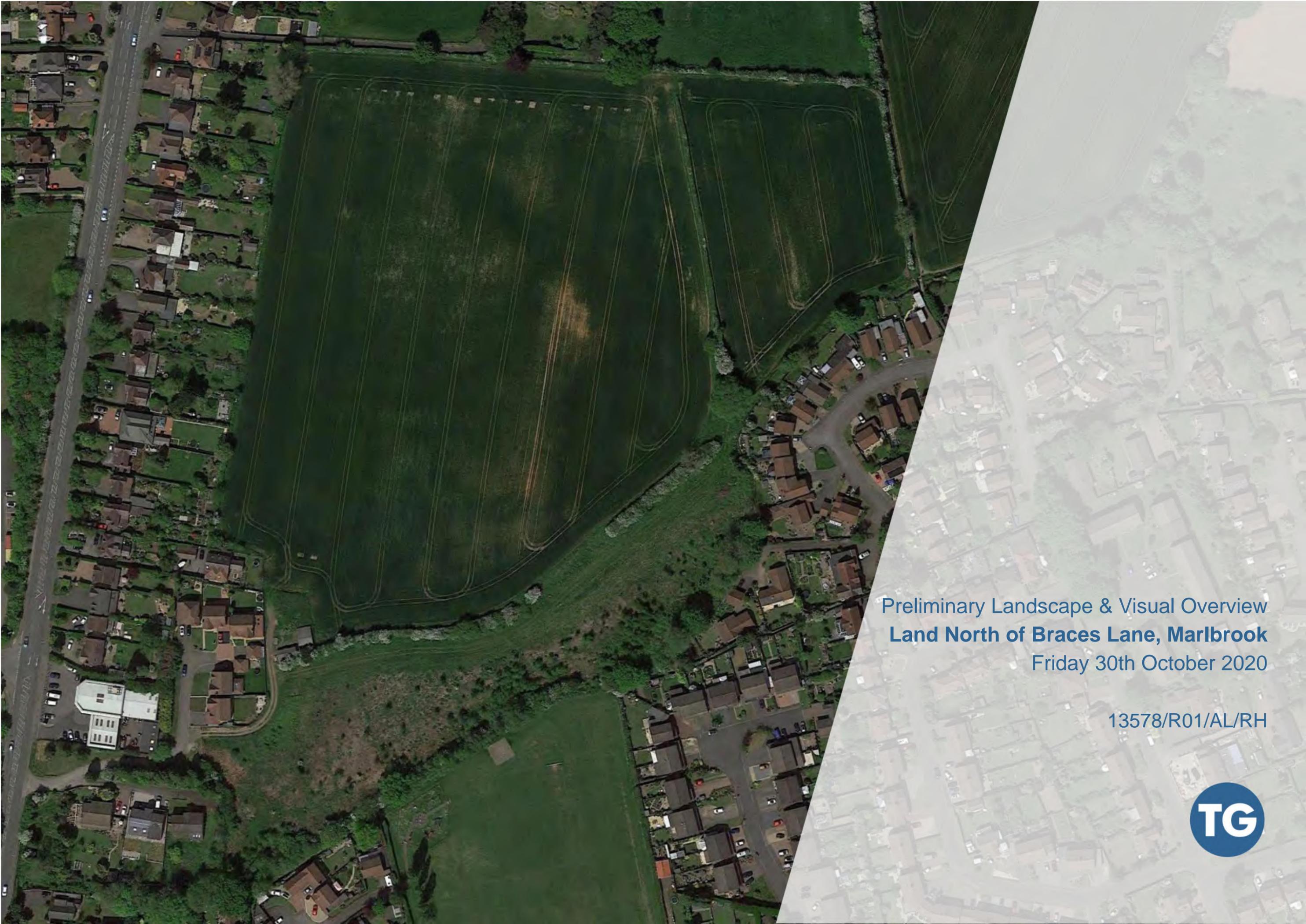
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 1. 0121 755111
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APPENDIX B – ACCESS DRAWINGS





Preliminary Landscape & Visual Overview
Land North of Braces Lane, Marlbrook
Friday 30th October 2020

13578/R01/AL/RH





<u>Revision</u>	<u>Date</u>	<u>Author / Checked</u>
13578/R01 (DRAFT)	29/10/2020	AL/RH
13575/R01	30/10/2020	RP/RH
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Section 2: Policy Context	2
Section 3: Landscape Character	5
Section 4: Visual Study	7
Section 5: Green Belt	13
Section 6: Recommendations and Conclusion	14

Plan 1: Site Location and Site Context
Plan 2: Viewpoint Location Plan
Plan 3: Green Belt Plan
Plan 4: Landscape Framework Plan (13578/P01a)

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1 Introduction and Site Context

Background

- 1.1 Tyler Grange have been appointed by Gleeson Strategic Land and RPS to provide landscape consultancy services in relation to the Catshill and North Marlbrook NDP Representation for Land North of Braces Lane, hereafter referred to as the site.
- 1.2 This report does not constitute a Landscape and Visual Appraisal (LVA) or full Landscape and Visual Impact Assessment (LVIA). It is intended to provide high level feasibility advice on landscape and visual matters, and to advise on the developability of the site by identifying potential landscape and visual constraints and opportunities.

Site Context

- 1.3 The site comprises 7.4ha of agricultural fields approximately four kilometres north of Bromsgrove town centre, on the northern periphery of Catshill and Marlbrook. The site is contained by housing to the west, south and southeast, with agricultural land to the north and northeast. There are several small businesses located within the adjoining urban edge to the west, and a recreation ground to the immediate south of the site. The site would be accessed from Birmingham Road (A38) to the west.
- 1.4 The topography of the site broadly slopes up from approximately 154m AOD (Above Ordnance Datum) at the southern edge of the site, to 178m AOD at the northern edge. To the immediate north of the site there is a wooded knoll within which a detached residential property is located. The agricultural landscape to the north-east and east of the site is undulating and ground levels continue to rise to the north-east towards Alvechurch Highway.
- 1.5 There is a network of Public Rights of Way (PROWs) within the vicinity of the site that provides connectivity to the surrounding area such as Birmingham Road, Alvechurch Highway, Cottage Lane, Green Lane, Woodrow Lane and Golden Cross Lane. One of these footpaths (Ref: 508(C)) runs north-south along the eastern boundary of the site beyond the site boundary fencing and hedgerow vegetation. Another footpath (Ref: 502(B)) runs east-west from Birmingham Road to Cottage Lane between housing and through the adjoining recreation ground, separated from the site by a watercourse (Marl Brook) which is well vegetated.
- 1.6 The site is located within the Green Belt.

Plan 1: Site Location and Site Context



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National Planning Policy Framework 2019 (NPPF)

- 2.1 At the heart of the NPPF is a presumption in favour of sustainable development. For plan making the presumption requires plans to positively seek opportunities to meet the development needs of an area and be sufficiently flexible to adapt to rapid change. Footnote 6 accompanying the presumption identifies protected areas or assets of particular importance to the site which include Green Belt and Designated Heritage Assets.
- 2.2 Paragraph 12 of the NPPF clarifies that the presumption in favour of sustainable development does not change the status of the development plan as the starting point for decision making. Furthermore, it confirms that where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.
- 2.3 The creation of high quality buildings and places is fundamental to what the planning and development process should achieve, as stated at paragraph 124.
- 2.4 Paragraph 127 seeks to ensure that developments:
*“Will function well and add to the overall quality of the area, just not for the short term but over the lifetime of the development;
are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder,*

and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

- 2.5 Paragraph 170 requires planning policies and decisions to contribute to and enhance the natural and local environment by fulfilling criteria including amongst others:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.*

National Planning Practice Guidance

- 2.6 Whilst National Planning Practice Guidance (NPPG) is to be updated, it does not preclude development. It considers that the creation of new residential neighbourhoods can, through sensitive design, be deemed acceptable even where it results in a loss of open countryside. Those categories within the NPPG that are of particular relevance to landscape and visual matters in relation to this site are set out below.

Design

- 2.7 The NPPG emphasises the need for development to be integrated with its surrounding context, reinforces local distinctiveness, reduces impacts on nature and sense of place, and considers views into and out of sites. This includes the use of local building forms and ensuring that development reflects the layout, scale, pattern and materials within new development. At paragraph 007 Reference ID: 26-007-20140306, it states: *“planning should promote local character (including landscape setting). Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of developments, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation”.*
- 2.8 The use of high quality hard and soft landscape design to help successfully integrate development into the wider environment is also emphasised as being important to consider from the outset, in order to ensure proposals improve the overall quality of the townscape and landscape.

Green Infrastructure

- 2.9 This NPPG highlights the multifaceted benefits provided through the provision of Green Infrastructure, including but not limited to: “enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, urban cooling, and the management of flood risk” (Paragraph: 005 Reference ID: 8-005-20190721).
- 2.10 Moreover, the NPPG recognises how green infrastructure exists within a wider landscape context and can thus be used to reinforce and enhance local landscape character and contribute to a sense of place.

Landscape

- 2.11 The NPPG makes reference to the National Planning Policy Framework, stating: *“it is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes”* (Paragraph: 036 Reference ID: 8-036-20190721).
- 2.12 It is therefore emphasised that the cumulative impacts of development on the landscape need to be considered carefully, whereby proposals should *“avoid adverse impacts on landscapes and set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary”* (Paragraph: 036 Reference ID: 8-036-20190721).

Green Belt

- 2.13 The site currently falls within the West Midlands Green Belt where it meets the settlement edge of Marlbrook. The National Planning Policy Framework (NPPF) defines five purposes of the Green Belt designation in paragraph 134. These are as follows:
- to check unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.14 The NPPF requires that new Green Belt boundaries are clearly

2 Policy Context

defined, using physical features that are readily recognised and likely to be permanent (NPPF paragraph 136). Green Belt is detailed further in **Section 5** of this report.

Local Planning Policy

Bromsgrove District Plan (Adopted January 2017)

- 2.15 The policies within the Bromsgrove District Plan of relevance to landscape and visual matters, as well as Green Belt, include the following:
- BDP4 Green Belt
 - ENV 4 Local Green Space
 - BDP19 High Quality Design
 - BDP 21 Natural Environment
- 2.16 As illustrated below, the southern most field of the site is designated within the District Plan as Local Green Space under policy ENV 4, and is supported by a separate evidence base document, titled Local Green Spaces/Formal Open Spaces Study July 2020:



- 2.17 For Local Green Space to be designated however the NPPF requires that sites are clearly justified and underpinned by a robust evidence base. Section 3 of this report questions the legitimacy of this designation against the NPPF guidelines (Para 100.):
- a. *in reasonably close proximity to the community it serves;*
 - b. *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
 - c. *local in character and is not an extensive tract of land.*

Catshill and North Marlbrook Neighbourhood Plan (Pre-Submission)

- 2.18 The Plan sets out policies promoting and regulating how land will be used in the Parish.
- 2.19 The policies within the Neighbourhood Plan of relevance to landscape and visual matters, as well as Green Belt, include the following:
- 8.9 Quality Design
 - 10.2 Local Green Infrastructure
 - 10.5 Designation of Local Green Spaces
 - 10.7 Significant Views
- 2.20 Supporting the Neighbourhood Plan is an Evidence Base comprising 13 Appendices. Those of relevance to Landscape and Visual matters relating to the site are commented on below.

Housing Site Assessment (HSA) by the Neighbourhood Plan Housing Group (2017/18)

- 2.21 The HSA assess 25 individual land parcels around the Catshill and Marlbrook settlement area within which the site is identified within Parcel 12. The southernmost field of the site however is not included within the assessment parcel boundaries.
- 2.22 The HAS summary table for Parcel 12 relating to Green Belt and Landscape and Visual impact is shown below:

Assessment Factors	
GB Impact	Relatively modest impact
Visual Impact	Significant
Landscape Capacity	Low to medium

- 2.23 Regarding 'Landscape Impact', the assessment summarises that development of site 12 would result in *"significant impact on local landscape because of topography and views of site from Braces Lane"*. It is assessed to have Low to medium capacity to accept development.
- 2.24 Furthermore, the summarising comments state that:
- "The southern portion of this land parcel is a prominent feature in the local landscape providing a backdrop to the recreational area/open space off Braces Lane. The site is relatively well contained by existing housing to the west as well as partly to the east meaning its use for housing would not be particularly*

detrimental to the Green Belt. Nevertheless, its visual impact would be significant as development would make it a prominent and urbanising feature in the locality.

- 2.25 It is apparent that the site is deemed unsuitable for development largely due to matters relating to visual impacts, as well as issues relating to access. However no clear methodology has been presented to set out how these visual impacts have been assessed and ultimately deemed adverse enough to warrant the site not feasible for residential development. The assessment instead relies solely on statements without any substantiation or evidence which as such does not give a robust consideration of the capacity of the site to accommodate change and to accommodate residential development in particular.
- 2.26 This report provides an independent, site-specific and more in depth assessment of the site, considering the baseline scenario of the site with regard to its potential future development for residential use. The Landscape Framework plan accompanying this report takes consideration of how the potential residential development of the site can respond to the site-specific landscape character of the area so that the development would not undermine the landscape quality in this part of the CNMNDP area.

Tyler Grange Assessment - Summary

- 2.27 Whilst higher ground on the eastern part of the site is visible from Braces Lane and the recreation ground to the south, the majority of the site is screened from view by existing vegetation found along the watercourse.
- 2.28 Braces Lane is a built up residential road, with the site appearing in the background within a clearly residential context. The careful consideration of the approach to design layout and plot orientation could ensure that any development within the site sits within the context appropriately, even where the housing will appear on rising ground.
- 2.29 As the HAS points out, the site is well contained by existing housing to the east and west which serves to screen views from these directions, and as this report sets out, visibility of the site from the north and north-west is limited even where the landscape is open, due to the topographical arrangement of the landscape and the frequent appearance of knolls, together with the presence of field boundary and roadside vegetation.
- 2.30 Even where glimpses of the site are possible, it is predominantly the wooded knoll to the immediate north of the site that is visible

2 Policy Context

within the view, with the site appearing as an area of fields beneath this feature framed within a built context provided by the housing surrounding the site. As a result of this context the visual effects of any future development within the site are likely to be localised and limited to the immediate surroundings – mainly from Braces Lane, the recreation ground to the south of the site, and from the public footpath to the east (Ref: 508(C)).

2.31 Overall, the site does have capacity to accommodate housing development given its physical and visual containment, and its appearance within a clearly residential settlement edge. The right mitigation will be required to ensure any future development respects the topography of the site, incorporating development offsets and careful siting of new houses to ensure the development assimilates with the surrounding built up context in views from the south and north-east in particular, and retaining characteristic landscape features.

2.32 The Landscape Framework plan accompanying this report sets out how housing development can respond to the context in order to ensure develop sits well within the landscape and does not cause undue adverse effects.

AECOM - Site Options and Assessment' (December 2019)

2.33 In addition to CNMPC's own evidence, a separate site assessment exercise was carried out by AECOM in 2019. This also assessed the same 25 site options, based on desktop studies and site visits.

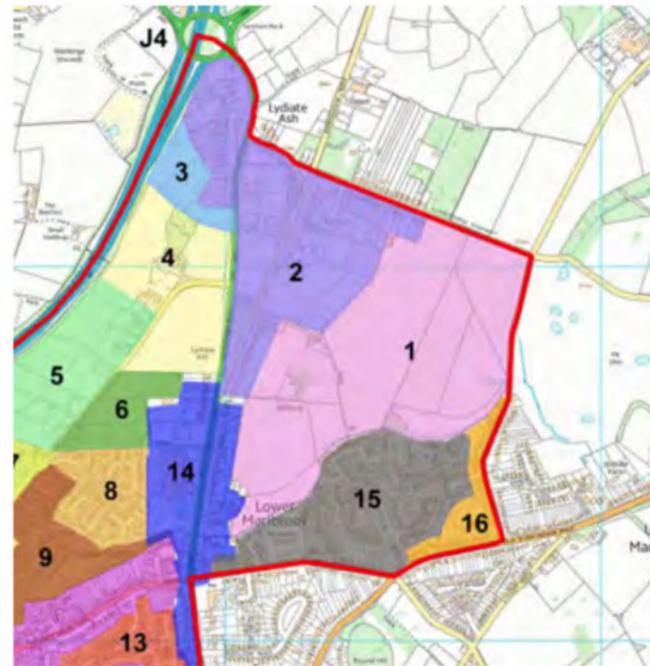
2.34 It is noted within the assessment that the main issue for the suitability of the site to development is that of landscape sensitivity and capacity. Namely, regarding landscape, the site is assessed to have 'High' sensitivity to development on the following basis:

"The site is included within Catshill and North Marlbrook Parish Landscape and Visual Sensitivity Capacity Assessment (February 2018). The site is located within LLCA 1. It is assessed that the area where this site is located has a low /medium capacity for development. The magnitude of landscape change is assessed as 'moderate as elements such as hedgerows, trees, PRoW could be retained although the agricultural land would be lost.' Furthermore, the magnitude of visual change is assessed as 'major as there would be noticeable change to a large proportion of the view.'"

2.35 It appears therefore that the judgement of landscape sensitivity derived by AECOM is exclusively based on evidence provided within the Catshill and North Marlbrook Parish Landscape and

Visual Sensitivity Capacity Assessment. The AECOM study does not acknowledge the wider area within which the site is actually identified within the Landscape and Visual Sensitivity Capacity Assessment, (LLCA 1) which includes open, rolling arable fields to the north east. The extents of LLCA 1 are illustrated below:

2.36 Therefore to an extent whilst some of the features and



sensitivities identified within the Sensitivity Capacity Assessment hold true for the site, including its rolling landform and views from the south, the AECOM study does not fully take into account the site specifics. This report provides that more specific level of site assessment in relation to these wider studies, and with reference to the specific type of development proposed (housing), in line with guidance set out within GLVIA3¹.

2.37 As section 3 of this report demonstrates, the site, given its location adjacent to Marlbrook's settlement edge, is influenced by existing built form which places it within an urban context. This is at odds with the Sensitivity Capacity Assessment which judges LLCA1 to have a High Landscape Sensitivity due its tranquillity and few detracting elements. The site survey work undertaken in conjunction with the preparation of this report did not identify any tranquillity associated with the site or surrounding area, which contains the usually detracting elements for a site at the edge of a settlement such as audible motorway noise, busy roads, small businesses and urban activities associated with a settlement edge and housing area.

2.38 Meanwhile, in response AECOMs assessment of the site as to having a High visual sensitivity to development, as Section 4 of this report demonstrates the visual influence of development would be far more localised in comparison to if the whole LLCA was developed, and the composition of the view is already compromised by residential built form in contrast to the more open rural land to the north-east of the site.

¹ GLVIA3 sets out that sensitivity and capacity assessments cannot provide a substitute for individual assessments in relation to change arising from specific development proposals as they cannot reliably inform assessment of the susceptibility to change when they are carried out without reference to any particular type of development and so do not relate to the specific landscape or the specific nature of the development in question.

3 Landscape Character

Landscape Character Evidence Base

Worcestershire Landscape Character Assessment (August 2012)

- 3.1 At the county level the site is located within the Lower Marlbrook - Enclosed Commons LCT, which is described as:

“A landscape of very similar character to the Sandstone Estatelands, with the same ordered pattern of large fields of regular outline, straight roads and estate plantations. It is an open, formal landscape with a visual clarity primarily defined by the straightness of the field boundaries, patterns that have arisen as a result of late enclosure from former waste and woodland.”

- 3.2 Key Characteristics of the LCT include:

- **Primary:** Hedgerow boundaries to fields; Planned enclosure pattern of straight boundaries and roads
- **Secondary:** Pastoral land use; Planned woodland character; Woodland pattern of discrete blocks
- **Tertiary:** Gently rolling topography; Open farmland landscape; Impoverished soils; Dispersed pattern of isolated farmsteads and scattered way- side dwellings

- 3.3 The full extract of the published character study guidance for planning and development within the Enclosed Commons LCT is appended to the rear of this report (**Appendix 1**).

Neighbourhood Plan Evidence Base

- 3.4 As set out within Section 2, the *Catshill and North Marlbrook Parish Landscape and Visual Sensitivity Capacity Assessment (February 2018)* forms part of the Neighbourhood plans evidence base.
- 3.5 The Catshill and North Marlbrook Parish Landscape and Visual Sensitivity Capacity Assessment provides a more refined assessment of Landscape Character in the local area by considering Local Landscape Character Areas (LLCAs). The site is identified within LLCA 1 with the site itself being located between LLCA 14 and 15 which comprise urban landscapes.
- 3.6 LLCA 1 is described to have the following features and qualities:
- Land Use:** *Arable*
- Elements and Features:** *Large scale fields enclosed by med/*

high hedgerows containing occasional mature trees. Ground slopes down from north to south with undulations. Lanes to north and east lined with mature trees.

Vegetation: *Main species of trees and hedgerows - Oak, elder, holly, native hedgerows.*

Built Form: *No built form.*

Communication: *PRoW's, bordered on two sides by lanes.*

Hydrology: *Stream along southern boundary.*

Public Amenity: *PRoW network.*

Context and Function: *Predominantly rural farmland.*

Visual: *Views within the LLCA – The northern part is the highest in the parish with distant open views looking south over the urban settlement of Lower Marlbrook. Good inter-visibility with the landscape beyond. Partial screening from undulating land form and hedgerows defining field boundaries. Open views of LLCA from PRoW.*

Landscape Character: *Rural quality, rolling land form is attractive and distant views possible. Reasonably tranquil, although aware of M5 noise in the distance. Views to east and south. Boundaries - Strong; hedgerows, with some post and rail & post and wire. Vegetation – hedgerows and occasional mature hedgerow oak tree (good quality). Few detractive elements - power/communication lines, rear view of bungalows with white plastic conservatories within residential area along southern boundary, quiet hum of motorway.*

Condition and Quality: *Good condition well managed farmland with few detractors.*

Site Specific Character

- 3.7 The site was surveyed on 27th October 2020 and found to consist of two agricultural fields in arable usage, with an additional linear field of rough marshy pasture adjacent to a watercourse (Marl Brook) to the south. Field boundaries are defined by tall hedgerows with hedgerow trees and some fencing in places where it adjoins housing. The most notable landscape feature on-site is the topography which undulates, much like the wider character area which contains notably undulating and 'knoll' like landforms. To the immediate north of the site is a residential property within a wooded knoll which can be seen from a range of localised views, and which the landform and vegetation of serves to screen views of the site itself from locations to the north and north-east.
- 3.8 The character of the site is typical of the Enclosed Commons

LCT in that it contains straight hedgerow field boundaries, is in agricultural use, and the rolling topography is notable. The open farmland landscape of the Enclosed Commons with isolated farmsteads and scattered dwellings is more evident in areas to the north and north-east of the site.

- 3.9 The site is also typical of the Local Landscape Character Area it is identified within in the CNMPC Landscape and Visual Sensitivity Capacity Assessment in that it is arable, enclosed by high hedgerows with mature hedgerow trees, and is undulating, and with a stream along the southern boundary and a public right of way running along the southern and eastern boundaries. The lack of built form noted within the CNMPC assessment is not wholly accurate however as there is a residential property within the LLCA to the immediate north of the site, set within an area of woodland, namely 'The Knoll'. The higher ground at Alvechurch Highway does into offer opportunities for distant open views looking south over the urban settlement of Lower Marlbrook – however, these views are from transient vehicles only as there are no pathways along the road and therefore no opportunities for higher sensitivity recreational receptors to appreciate them. The Knoll is visible within those views, with the site appearing as an area of fields on lower ground beneath it, and against a backdrop of existing housing in Marlbrook. The LLCA description is accurate in its appreciation of the partial screening that localised landform provides and the layering of field boundary hedgerow vegetation.



3 Landscape Character

- 3.10 The open views from public rights of way relate predominantly to land to the north-east of the site, as the site is screened from view from local footpath routes by intervening hedgerow vegetation and the wooded knoll to the north of the site.
- 3.11 Overall it is considered that the site is characteristic of the LLCA as described within the CNMPC assessment; however, it only contains the less notable features with visual openness and distinctive landscape features being more evident and readily visible from public rights of way within the land to the immediate north-east of the site, and due to the site being largely screened from view by tall boundary hedgerows, localised rolling landform and the wooded knoll to its north.
- 3.12 The audible presence of the M5 and A38 corridors to the west of the site, as well as the settlement edge of housing and small businesses adjoining the site, detracts from any sense of tranquillity associated with the site itself.

4 Visual Study

Site Specific Character

- 4.1 Based upon the preliminary fieldwork undertaken, the following sets out an approximate extent of visibility of the site:
- 4.2 To the north the site is bordered by hedgerow vegetation and a wooded knoll within which a residential property is located. It is anticipated that filtered views into the site will be possible from this residential property, but views from the public footpath that runs north from Cottage Lane along the sites eastern boundary are restricted by the wooded knoll (see **Photoviewpoint 1**). Further north, partial glimpsed views into the northern-most part of the site are possible from a public byway (Ref: 507(C)) which runs between Birmingham Road and the public footpath to the east of the site. The ground rises towards Alvechurch Highway and although the wooded knoll to the north of the site is visible, views into the site from a local footpath (Ref: 503(C)) and from Birmingham Road are restricted by intervening vegetation (see **Photoviewpoints 2 and 3**).
- 4.3 Alvechurch Highway to the north of the site is noted within the CNMPC Landscape and Visual Sensitivity Capacity Assessment to be the highest area in the Parish with open views over the settlement edge of Lower Marlbrook to the south which it states makes the site and landscape to the north-east of it highly sensitive and highly susceptible to change. **Photoviewpoint 4** shows that whilst this is true in relation to the land to the north-east of the site, the site itself is well-screened from view from locations along Alvechurch Highway, and therefore the site itself would not be highly susceptible to development with regards to views from this location. The stretch of road from which views are possible is to the east of the linear housing development along Alvechurch Highway where there is no footpath or pavement along the road, and where the only opportunities to stop and appreciate the view are when pulled over at laybys associated with field gate entrances. The sensitivity of such views is therefore also lower as the views predominantly relate to transient vehicular receptors, for whom most views southwards are filtered by roadside hedgerows and trees, and whose focus is on the journey ahead.
- 4.4 To the east the site is screened from view by the site boundary hedgerow vegetation, and the rolling topography of the field beyond. There is a glimpsed view from the public footpath running along the eastern site boundary (Ref: 508(C)) where a gap in the vegetation allows views into the site (see **Photoviewpoint 5**).

Plan 2: Viewpoint Location Plan



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4 Visual Study

- 4.5 To the south the site is partially screened by the riparian vegetation associated with the southern site boundary which follows the route of Marl Brook. But as there are higher ground levels on site in places, some of the site can be seen from the adjoining recreation ground to the south, and from the settlement edge at Braces Lane (see **Photoviewpoint 6**).
- 4.6 To the west the site adjoins the settlement edge along Birmingham Road whose rear garden boundaries overlook the site. It is anticipated that these properties will have direct upper storey rear views overlooking the site, but visibility beyond this row of housing is limited. Further west, the lie of the land restricts the possibility of seeing the site even from elevated locations west of the M5 corridor (see **Photoviewpoint 7**).
- 4.7 Overall, despite the site containing rising ground with localised undulations, the extent to which it can be seen from the surrounding landscape and public vantage points is limited. The most notable views of the site are from the south where the rising ground on site is seen from Brace Land and the adjoining recreation ground. From other locations, the wooded knoll is more dominant than any visibility of the site and where the site is partially visible, it registers visually within the built up context of the existing settlement edge that surrounds it.

4 Visual Study



Photoviewpoint 1: Taken from public footpath ref: 505(C).

Orientation: South Distance from site: 180m



Photoviewpoint 2: Taken from the Birmingham Road (A38).

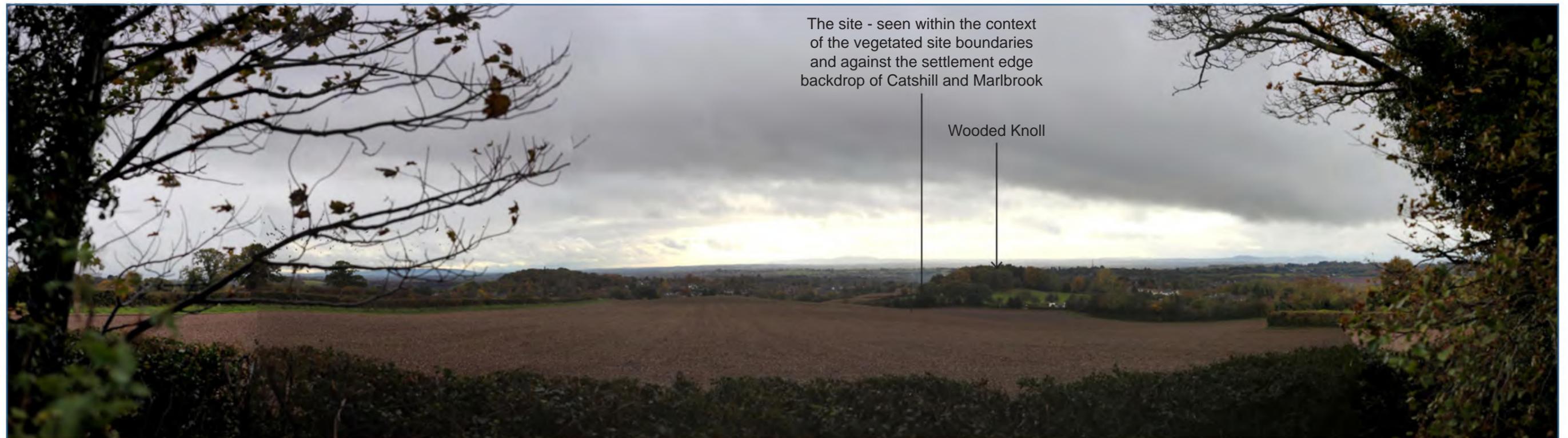
Orientation: South Distance from site: 335m

4 Visual Study



Photoviewpoint 3: Taken from public footpath ref: 503(C).

Orientation: South Distance from site: 375m



Photoviewpoint 4: Taken from Alvechurch Hwy.

Orientation: South-West Distance from site: 570m

4 Visual Study



Photoviewpoint 5: Taken from public footpath ref: 508(C) adjacent to the eastern site boundary.

Orientation: West Distance from site: 5m



Photoviewpoint 6: Taken from Braces Lane with the recreation ground south of the site in the foreground.

Orientation: North Distance from site: 145m

4 Visual Study



Photoviewpoint 7: Taken from Stourbridge Road.

Orientation: East Distance from site: 1.8km

5 Green Belt

NPPF

- 5.1 Purposes of the Green Belt and Redrawing of Green Belt Boundaries
- 5.2 Paragraph 133 of the NPPF defines the fundamental aim on Green Belt policy as to “prevent urban sprawl by keeping land permanently open.” At paragraph 134, the NPPF sets-out five purposes of the Green Belt. These are as follows:
1. “to check the unrestricted sprawl of large built-up areas;
 2. to prevent neighbouring towns from merging into one another;
 3. to assist in safeguarding the countryside from encroachment;
 4. to preserve the setting and special character of historic towns; and
 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”
- 5.3 Once established, the NPPF stipulates at paragraph 136 that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of Development Plans. It is therefore important that the evidence base underpinning the plan and justification for the removal of land from the Green Belt is robust and sound.
- 5.4 The revised NPPF requires the policy-making authority to be able to demonstrate that it has examined all reasonable options for meeting identified need for development, through: examination of strategic policies; whether the strategy makes the best use of suitable brownfield sites and underutilised land; and optimises density and has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need.
- 5.5 NPPF Paragraph 138 requires Development Plans to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 5.6 When defining new Green Belt boundaries, plans should: “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” (NPPF paragraph 139)

Site-Specific Green Belt Assessment

Contribution to the Green Belt

- 5.7 Purpose 1: The site is located on the northern edges of Marlbrook and Upper Catshill, and so the issue of sprawl relates to expansion of the settlement edge northwards. The site is surrounded on its western, southern and south-eastern sides by existing settlement, and by a residential driveway and property to the north at ‘The Knoll’. Development within the site would be contained by the sites northern and eastern boundaries which also align with a public footpath and a residential driveway. These features, together with a development response which seeks to bolster the site boundary vegetation at the northern and eastern edges of the site and to draw back any development from the wooded knoll to the north will restrict settlement expansion northwards with the footpath and wooded knoll ultimately representing permanent features that border and define the edge of the built up area.
- 5.8 Purpose 2: In terms of preventing the merging of neighbouring towns, the site is located within the settlement edges of Catshill and Marlbrook, and its northern and easternmost edges do not extend any further north or east than the existing extents of the settlement which currently extend up Birmingham Road towards Alvechurch Highway to the north. Development on site would appear as a consolidation of the existing settlement edge rather than contribute towards any perception of the joining or merging of Catshill and Marlbrook with Lydiate Ash to the north.
- 5.9 Purpose 3: Although the site is currently undeveloped, it occupies a series of agricultural fields which are located adjacent to the settlement edge of Catshill And Marlbrook, which places it in a peri-urban context.
- 5.10 The sense of undeveloped countryside is more evident to the north-east of the site where there is less surrounding development and where roads change from those aligned by housing and businesses, to country lanes with limited development. The public footpath, site boundary hedgerows and wooded knoll provide robust and permanent settlement boundaries and the rolling ground beyond the site to the north-east limits the degree to which the site is perceived from the undeveloped land.
- 5.11 Purpose 4: The site is not known to make any historic landscape setting or character contributions to the settlement edge of Catshill and Marlbrook.

- 5.12 Purpose 5: Any greenfield site would be contrary to this purpose of the Green Belt definitions, and this needs to be taken into account when considering the redrawing of Green Belt boundaries in association with identifying areas for new housing beyond the use of brownfield sites.

Opportunities for Green Belt Release

- 5.13 The driveway and hedgeorw and trees to the northern site boundary and mature boundary hedgerows to the east provide robust features and the opportunity for new Green Belt boundaries. In line with the requirements of the NPPF, there are also opportunities to retain the eastern field within the Green Belt, providing compensatory improvements for access and recreation, as well as landscape and biodiversity enhancements.
- 5.14 Overall, the site specific assessment demonstrates that the site makes a limited contribution to the function and purposes of the Green Belt and offers the opportunity for the release of land form the Green Belt with robust new boundaires and enahancments to land retaiend in the Green Belt.

Plan 3: Green Belt Plan



- | | | |
|--|--|--|
| Site Boundary | Land within the existing Green Belt | Green Belt boundary vegetation to be strengthened |
| Existing settlement edge and current Green Belt boundary | Proposed settlement edge and Green Belt boundary | Public Open Space within site to strengthen permanence of proposed Green Belt boundary |

6 Recommendations and Conclusion

6.1 In response to the findings of this overview report and the proposed release of the site for housing development, a landscape framework plan has been prepared to accompany this report. It sets out recommended mitigation and enhancement measures to ensure development responds to the local character and visual context, and can best assimilate with the surrounding landscape.

6.2 The recommendations set out on the landscape framework plan are:

- Development should be offset from the northern boundary of the site to respect the character of the wooded knoll to the north and avoid development occupying the rising ground associated with it.
- The retention and enhancement of the existing field boundary hedgerows within the site will provide a robust and defensible new Green Belt boundary.
- Retention of an area of open space to the east of the site would reinforce the defensibility and permanence of the new Green Belt boundary, and would be in line with the NPPF with the delivery of biodiversity and recreation enhancements on retained land within the Green Belt. The space will provide opportunities for public open space provision and enhanced connectivity to the existing public footpath to the immediate east of the site.
- It will be important to ensure development towards the south of the development area on site appears consistent with the existing residential context adjacent in views of the site from the south.
- Retention of a development offset in conjunction with Marl Brook will provide an opportunity to create a linear area of natural open space, with opportunities for biodiversity enhancements and links to existing footpath routes.

Conclusion

6.3 The Landscape and Visual Sensitivity Capacity Assessment produced on behalf of the Catshill and North Marlbrook Parish Council in association with the preparation of their Neighbourhood Plan states that:

“The southern portion of this land parcel is a prominent feature in the local landscape providing a backdrop to the recreational area/open space off Braces Lane. The site is relatively well-contained by existing housing to the west as well as partly to

the east meaning its use for housing would not be particularly detrimental to the Green Belt. Nevertheless, its visual impact would be significant as development would make it a prominent and urbanising feature in the locality.”

6.4 The study undertaken in association with the preparation of this landscape and visual overview confirms that the topography of the site is indeed notable – with rolling ground levels and localised knolls, and this does form a backdrop to Braces Lane. However, the site is already influenced by existing development to the north (The Knoll residential dwelling), south-east (Cottage Lane and Redland Close housing), the south (Braces Lane housing and recreation ground) and the west (Four Oaks Drive housing, Birmingham Road housing and business premises), and as such it is viewed within a settled edge context.

6.5 Housing development within the site would not be uncharacteristic given this context, and the visual and physical containment provided by the site boundaries and local topographical situation.

6.6 This overview note has demonstrated that the visual influence of the site is very localised, and that the site represents a typical part of the wider landscape character type within which it is situated. No rare, notable or defining character features have been identified in association with the site. It is considered that in association with the recommended landscape mitigation and enhancement measures, a development could be created on-site which would not detrimentally impact upon the function and purpose of the remaining Green Belt, nor cause undue adverse impacts on the character of the landscape in this area, or sensitive visual receptors.

6.7 The site makes a limited contribution to the purposes and function of the Green Belt and could be released for development on land that is well contained and influenced by the existing settlement, with robust new boundaries. Furthermore, there are opportunities to retain the land to the east of the site within the Green Belt, providing improvements for recreation and access to the wider public right of way network, as well as landscape and biodiversity enhancements.

6 Recommendations and Conclusion

Plan 4: Landscape Framework Plan (13578/P01a)



-  Site Boundary
-  Existing field boundary hedgerow vegetation to be retained and enhanced
-  Existing Public Right of Way
-  Recommended development offset and area of Public Open Space
-  Frontage/elevation design considerations required to ensure development blends into context of housing adjacent when viewed from south
-  Opportunity to link recreational routes within POS on-site to wider network of Rights of Way surrounding the site
-  Potential Access