BROMSGROVE DISTRICT COUNCIL

BROMSGROVE DISTRICT LOCAL PLAN – PROPOSED MODIFICATIONS

REPORT OF THE INQUIRY INTO OBJECTIONS TO THE PROPOSED MODIFICATIONS OF THE LOCAL PLAN

Inspector: **CLIVE A RICHARDSON BA(Hons) MCD MRTPI**

Dates of Inquiry: **22-25, 29-31 May 2001**
1, 6-8 June 2001
5, 6, 10-13, 17-20, 24, 25, 31 July 2001
1-3 August 2001

Throughout the report I have used abbreviations for matters that appear regularly in the text. These comprise:

BDC	Bromsgrove District Council
WCC	Worcestershire County Council
BDLP	Bromsgrove District Local Plan
BDLPPM	Bromsgrove District Local Plan including Proposed Modifications
HWCSP	Hereford and Worcester County Structure Plan 1986-2001
WCSP	Worcestershire County Structure Plan 1996-2011
EiP	Worcestershire County Structure Plan Examination in Public
RPG	Regional Planning Guidance
PPG	Planning Policy Guidance
SPG	Supplementary Planning Guidance
CD	Core Document
VDS	Village Design Statement
ADR	Area of Development Restraint
LPA	Landscape Protection Area
RTS	Round Table Session
SAM	Scheduled Ancient Monument
DoE	{Department of the Environment
DETR	{Department of the Environment, Transport and the Regions
DTLR	{Department of Transport, Local Government and the Regions
GOWM	Government Office for the West Midlands
dph	Dwellings per hectare
AOD	Above ordnance datum

Summary of Inspector's Recommendations

1. DISTRICT STRATEGY

. I recommend that land be designated as ADRs and excluded from the Green Belt at: the former Brickworks site, Alvechurch; south of Kidderminster Road, Hagley; Bleakhouse Farm, Wythall; Church Road, Catshill; and Kendal End Road, Barnt Green.

Recommendations

1.2.51 That Paragraph 8.19 of the explanatory text be expanded (or a further Appendix introduced):

(i) explaining that ADR provision is being made to satisfy requirements to about 2021.

(ii) setting out how the total quantity of ADR land has been derived. This should equate to approximately 140ha.

(iii) outlining the factors that have determined the broad geographical distribution of ADRs.

(iv) identifying the criteria used in the selection of ADRs.

(v) specifying the 'exceptional circumstances' that necessitate a revision of confirmed Green Belt boundaries.

1.2 Policy DS1 – Green Belt Designation [Proposed Modification No DS/MOD5]

Recommendations

1.3.91 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD5, subject to the following additional modifications:

Issue 2:

(i) the former Brickworks site, Scarfield Road, Alvechurch be designated as an ADR.

(ii) the Green Belt boundary be redrawn in accordance with Plan 1 of the Appendices to the Chapman Warren proof O/DS1-DS/MOD5/60/1018/ACB/1-APP, subject to the omission of land west of the canal and south of the Brickworks.

(iii) a new strategic open space protection policy be applied to the field east of the canal and west of the railway line.

(iv) the Proposals Map and Appendix 3A be modified accordingly.

Issue 8:

The explanatory text at Paragraph 8.19 be expanded (or a further Appendix introduced):

(i) to justify the level of ADR provision made.

(ii) to explain the general principles on which ADRs have been selected.

(iii) to clarify how PPG3 advice has been addressed in terms of:

a) urban capacity
b) the sequential approach to site assessment
c) the best use of land
d) achieving sustainable residential environments
e) the role of the 'plan, monitor and manage' approach

(b) That no further modifications be made to the Plan in respect of these objections *(Issues 1, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14 and 15).*

1.3 Policy DS4 – Other Locations for Growth [Proposed Modification No DS/MOD8]

Recommendations

1.4.5 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD8.

(b) That no further modifications be made to the Plan in respect of this objection.

1.5 Policy DS5 – Village Envelope Settlements [Proposed Modification No DS/MOD9]

Recommendations

1.5.14 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD9.

(b) That no further modifications be made to the Plan in respect of these objections.

1.6 Policy DS8 – Areas of Development Restraint [Proposed Modification No DS/MOD12]

Recommendations

1.6.163 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD12, subject to the following additional modifications:

Issue 1:

(i) land south of Kidderminster Road, Hagley be designated as an ADR and excluded from the Green Belt.

(ii) the Proposals Map and Appendix 3A be modified accordingly.

Issue 3:

(former Brickworks site, Alvechurch) See recommendations at Paragraph 1.3.91.

Issue 4:

The following be added to Paragraph 8.19 of the explanatory text, after the words "….. Areas of Development Restraint (ADRs)":

> **"They represent sustainable locations for development whilst having regard to Green Belt objectives. The identification of such areas will reduce the likelihood of the need to redefine Green Belt boundaries before 2021."**

Issue 16:

(i) land at Bleakhouse Farm, Wythall [shaded brown on G L Hearn Planning drawing J6915/1 dated May 2001, but excluding the 2 middle fields immediately north of the farm buildings] be designated as an ADR and excluded from the Green Belt.

(ii) the Proposals Map and Appendix 3A be modified accordingly.

Issue 20:

See recommendations at Paragraph 1.3.91.

Issue 24:

(i) land at Church Road, Catshill be designated as an ADR.

(ii) the Green Belt boundary be drawn as shown on Plan 3 accompanying the main hearing statement of Stansgate Planning Consultants (Docs O/DS8 – DS/MOD12/1019/1420/PGH/1 and O/DS8 – DS/MOD12/1020/1421/PGH/1).

(iii) the Proposals Map and Appendix 3A be modified accordingly.

Issue 28:

(i) land at Kendal End Road, Barnt Green be designated as an ADR.

(ii) the Green Belt boundary be redrawn to follow the line of Cherry Hill Road and Kendal End Road.

(iii) the Proposals Map and Appendix 3A be modified accordingly.

(b) That no further modifications be made to the Plan in respect of these objections *(Issues 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 21, 22, 23, 25, 26, 27, 29 and 30)*.

1.7 Policy DS11 – Planning Obligations [Proposed Modification No DS/MOD15]

Recommendations

1.7.4 **(a) That the Plan be modified in accordance with Proposed Modification DS/MOD15, subject to the following additional modifications:**

(i) The explanatory text at Paragraph 8.22 be expanded to make reference to the advice on planning obligations set out in Circular 1/97.

(ii) Sub-section a) of Policy DS11 be altered to read:

"on or off-site facilities directly arising from the development such as additional educational, community, recreational or other infrastructure which may reasonably be required as a result of the scheme; or"

(b) That no further modifications be made to the Plan in respect of these objections.

1.8 Policy DS13 – Sustainable Development [Proposed Modification No DS/MOD16]

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Recommendations

1.8.5 (a) That Proposed Modification DS/MOD16 be not made.

(b) That Policy DS13 be modified to read:

"The District Council will take full account of the need for future development to be sustainable so that present demands do not compromise the ability of future generations to meet their own demands or enjoy a high quality environment. All development must reflect the need to safeguard and improve the quality of life of residents by:

- **maintaining high and stable levels of economic growth and employment**
- **ensuring social progress which recognises the needs of everyone**
- **conserving energy resources, and**
- **protecting the Plan area's essential character and environmental assets, including:**

  a) the general attractiveness and diversity of the landscape
  b) the open and undeveloped nature of the countryside
  c) the Green Belt
  d) areas of wildlife and ecological value
  e) the setting, form and character of settlements
  f) the quality of air and water resources

g) buildings and areas of special townscape, historic and architectural interest
h) sites of archaeological importance
i) land of recreation and amenity value, and
j) the best and most versatile agricultural land."

(c) That Paragraph 8.24 be modified to read:

"It is the District Council's intention that this local plan should reflect concern for the present and future quality of life of its residents. Defining broad sustainable development aims and criteria is essential for providing the direction and essential yardstick in later appraisals of development plan policies and proposals."

(d) That the Council includes references to Village Design Statements in the relevant settlement chapters of the Plan.

(e) That no further modifications be made to the Plan in respect of these objections.

1.9 Policy DS14 – Enforcement [Proposed Modification No DS/MOD17]

Recommendations

1.9.7 That the Plan be modified in accordance with Proposed Modification DS/MOD17, subject to the following additional modification:

Paragraph 8.25 to read:
"The District Council will publish a policy document on the enforcement of planning controls. It is intended that this document will be adopted by the Council as supplementary planning guidance and reviewed on a regular basis."

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2. HOUSING

2.1.1 This chapter of the report considers the relationship of Stoke Prior to Bromsgrove town. It examines the detailed wording and scope of policies relating to new dwellings within and outside the Green Belt, plot subdivision in urban areas, and the replacement, extension and change of use of dwellings in the Green Belt. It

addresses various matters relating to affordable housing. I support the deletion of Policy S8A and recommend a number of further modifications to both policies and explanatory text.

2.2 Policy S1 – Structure Plan Requirements [Proposed Modification No SET/MOD1]

Recommendations

2.2.1 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD1.

(b) That no further modifications be made to the Plan in respect of this objection.

2.3 Policy S7 – New Dwellings outside the Green Belt [Proposed Modification No SET/MOD6]

Recommendations

2.3.4 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD6, subject to the deletion of criterion c) from Policy S7.

(b) That no further modifications be made to the Plan in respect of these objections.

2.4 Policy S8A – Plot Sub-Division in Urban Areas [Proposed Modification No SET/MOD7]

Recommendation

2.4.5 (a) That Proposed Modification SET/MOD7 be not made.

(b) That no further modifications be made to the Plan in respect of these objections.

i.e. this means deletion of policy from the Plan (pc)

2.5 Policy S9 – New Dwellings in the Green Belt [Proposed Modification No SET/MOD8]

Recommendations

2.5.6 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD8, subject to the following additional modifications:

(i) Further categories be included in Policy S9, as follows:

"e) where it concerns a replacement dwelling in accordance with Policy S12;
f) where it concerns the sub-division of an existing dwelling in accordance with Policy S13."

(ii) Substitution of the following text for the 3rd and 4th sentences of Paragraph 9.14:

"The District Council seeks, by this policy, to confirm its intention to safeguard all Green Belt areas from continuing pressure for piecemeal residential development and to confine acceptable uses to a minimum allowing only for certain specialised uses, limited infill, replacement dwellings and the sub-division of existing dwellings in acceptable locations."

(b) That no further modifications be made to the Plan in respect of these objections.

2.6 Policy S11 – Extensions to Dwellings in the Green Belt [Proposed Modification No SET/MOD9]

Recommendations

2.6.2 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD9.

(b) That no further modifications be made to the Plan in respect of this objection.

2.7 Policy S12 – Replacement of Dwellings in the Green Belt [Proposed Modification No SET/MOD10]

Recommendations

2.7.4 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD10.

(b) That no further modifications be made to the Plan in respect of these objections.

2.8 Policy S13A – Changes of Use of Dwellings in the Green Belt [Proposed Modification No SET/MOD11]

Recommendations

2.8.3 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD11.

(b) That no further modifications be made to the Plan in respect of this objection.

2.9 Policy S15 – Affordable Housing in Urban Areas [Proposed Modification No SET/MOD13]

Recommendations

2.9.10 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD13, subject to the following additional modification:

Paragraphs 9.23-9.25 of the explanatory text be deleted and a replacement paragraph substituted setting out the current site/development size thresholds above which the Council will seek to negotiate with developers for an element of affordable housing.

(b) That consideration be given to adopting the new Housing Needs Survey as supplementary planning guidance.

(c) That no further modifications be made to the Plan in respect of this objection.

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3. SHOPPING

3.1.1 The criteria of Policy S21 are examined. I recommend further modifications in respect of both the policy criteria and the explanatory text.

3.2 Policy S21 – Out-of-Town Shopping [Proposed Modification No SET/MOD19]

Recommendations

3.2.6 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD19, subject to the following further modifications:

(i) A new criterion be added to Policy S21:

"f) the suitability and viability of the site for the proposed use, and whether it is likely to become available within a reasonable period of time."

(ii) The explanatory text to Policy S21 be altered to indicate that:

"Developers and retailers should be flexible about the format, design and scale of a development, and the amount of car parking - which should be tailored to meet local circumstances."

(iii) Criterion c) of Policy S21 be altered to indicate that:

"retail uses will not normally be permitted on land allocated for industry, employment and housing where this can be shown to have the effect of limiting the range and quality of sites that would be available."

(b) That no further modifications be made to the Plan in respect of these objections.

4. CONSERVATION

4.1.1 In this chapter I examine the role of Village Design Statements. I look at the adequacy of policies intended to protect buildings of merit, conservation areas, and historic parks and gardens. While generally supporting the Council's

Proposed Modifications, I recommend further alterations in respect of Policy S48 and its supporting text.

4.2 Policy S35A – Development in Conservation Areas [Proposed Modification No SET/MOD28]

Recommendations

4.2.1 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD28.

(b) That no further modifications be made to the Plan in respect of this objection.

4.3 Policy S38 – Protection of Buildings of Merit [Proposed Modification No SET/MOD30]

Recommendations

4.3.1 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD30.

(b) That no further modifications be made to the Plan in respect of this objection.

4.4 Policy S44 – Reinstatement of Features in Conservation Areas [Proposed Modification No SET/MOD35]

Recommendations

4.4.1 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD35.

(b) That no further modifications be made to the Plan in respect of this objection.

4.5 Policy S48 – Historic Parks and Gardens [Proposed Modification No SET/MOD39]

Recommendations

4.5.5 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD39, subject to the following additional modifications:

(i) The final sentence of Policy S48 be further modified to read:

"The District Council will liaise with English Heritage and the Garden History Society in considering applications either within the boundaries of such parks and gardens or in proximity to them where important views from the park and/or garden would be materially affected."

(ii) The explanatory text at Paragraph 9.58 be further modified to read:

"Historic parks and gardens comprise those listed in the register of parks and gardens of special historic interest maintained by English Heritage, and other parks and gardens of regional importance in the District. These are: Hagley Park (Grade I), Hewell Park (Grade II*) ……" ***[add those parks and gardens of regional importance]***

(b) That no further modifications be made to the Plan in respect of this objection.

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5. LANDSCAPE

5.1.1 In this short section of the report I consider the adequacy of the criteria laid out in Policy C4 for assessing the impact of development on the landscape. I support the Council's policy approach and recommend no further modifications.

5.2 Policy C4 – Criteria for Assessing Development Proposals [Proposed Modification No CTRY/MOD7]

Recommendations

5.2.2 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD7.

(b) That no further modifications be made to the Plan in respect of this objection.

6. NATURE CONSERVATION

6.1.1 Having considered the scope for restricting development adjacent to sites of nature conservation significance I conclude that it would be inappropriate to adopt a rigid distance formula.

6.2 Policy C10A – Development Affecting Other Wildlife Sites [Proposed Modification No CTRY/MOD13]

Recommendations

6.2.5 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD13.

(b) That no further modifications be made to the Plan in respect of this objection.

7. WOODLANDS

I find it would be unduly prescriptive to adopt a policy approach that precludes development within a specified distance of existing woodland. The Policy as drafted allows a range of management practices to be pursued.

7.2 Policy C18 – Retention of Existing Woodland [Proposed Modification No CTRY/MOD18]

Recommendations

7.2.7 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD18.

(b) That no further modifications be made to the Plan in respect of these objections.

8. AGRICULTURE

I examine detailed criticisms made in respect of various policies. While generally supporting the Council's Proposed Modifications, I recommend further changes to Policy C23 and its supporting text to more closely accord with Circular advice on planning obligations and planning conditions. I suggest minor changes to other Policies.

8.2 Policy C21 – New Agricultural Dwellings [Proposed Modification No CTRY/MOD20]

Recommendations

8.2.3 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD20.

(b) That no further modifications be made to the Plan in respect of this objection.

8.3 Policy C23 – Additional Dwelling Units on Farms [Proposed Modification No CTRY/MOD21]

Recommendations

8.3.6 (a) That Proposed Modification CTRY/MOD21 be not made.

(b) That Policy C23 and Paragraph 10.29 be redrafted, as follows:

C23

"Where planning permission is granted for the construction of an additional dwelling unit on an agricultural holding, the District Council will consider imposing an occupancy condition on existing dwellings on the unit which are under the control of the applicant, do not have occupancy conditions and need at the time of the application to be used in connection with the farm. In appropriate circumstances, an agreement under Section 106 of the Town and Country Planning

Act 1990 may be sought to tie a farmhouse to adjacent farm buildings or to the agricultural land of the unit."

Paragraph 10.29

"The District Council is entrusted with safeguarding the rural environment, particularly in view of its Green Belt designation. Where dwellings are required in support of agricultural activities the District Council will expect to see full justification of need and will consider imposing occupancy conditions on existing dwellings, as well as the new dwelling. A legal agreement may be sought to maintain the existing range of dwellings for agriculture to prevent them being sold separately without further application.

(c) That no further modifications be made to the Plan in respect of this objection.

8.4 Policy C24 – Removal of Occupancy Conditions [Proposed Modification No CTRY/MOD22]

Recommendations

8.4.4 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD22, subject to the following additional modification:

The word "wider" be deleted from the Policy to avoid ambiguity and the explanatory text be clarified with regard to the definition of 'area' and 'locality'.

(b) That no further modifications be made to the Plan in respect of this objection.

8.5 Policy C27 – Re-Use of Existing Rural Buildings [Proposed Modification No CTRY/MOD23]

Recommendations

8.5.6 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD23 (relating to Policy C27).

(b) That no further modifications be made to the Plan in respect of this objection.

8.6 Policy C27B – Residential and Commercial Re-Use of a Rural Building [Proposed Modification No CTRY/MOD23]

Recommendations

8.6.1 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD23 (relating to Policy C27).

(b) That no further modifications be made to the Plan in respect of this objection.

8.7 Policy C27C – Extensions to Converted Rural Buildings [Proposed Modification No CTRY/MOD24]

Recommendations

8.7.3 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD24, subject to the following additional modifications:

(i) Policy C27C be redrafted to read:

"Proposals for extensions to converted rural buildings will be assessed against the impact of the scheme on the character of the building as it existed immediately prior to conversion rather than the use to which it has been converted."

(ii) The explanatory text to Policy C27C be modified to carry a cross-reference to criterion b) of Policy C27.

(b) That no further modifications be made to the Plan in respect of these objections.

8.8 Policy C28 – Deletion recommended by BDLP Inspector [Proposed Modification No CTRY/MOD25]

Recommendations

8.8.1 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD25.

(b) That no further modifications be made to the Plan in respect of this objection.

8.9 Policy C30 – Twelve Month Limit for Re-Use of Building [Proposed Modification No CTRY/MOD26]

Recommendations

8.9.1 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD26.

(b) That no further modifications be made to the Plan in respect of this objection.

8.10 Policy C30A – New Agricultural Buildings [Proposed Modification No CTRY/MOD27]

Recommendations

8.10.1 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD27, subject to the following additional modifications:

(i) Policy C30A be altered to read:

"Proposals for new agricultural buildings will be considered favourably where they comply with the following criteria:

- **a) the proposal is in accordance with the provisions of Policies C4 and C5;**
- **b) the scale and design of the building is appropriate to its intended use;**
- **c) the proposal forms part of a group of buildings wherever practicable;**
- **d) appropriate materials and dark matt colours are employed wherever practicable."**

(ii) Paragraph 10.35B of the supporting text be altered to read:

"This policy is intended to cover proposals for agricultural buildings which either require a specific planning permission or are permitted by the Town and Country Planning (General Permitted Development) Order 1995 but require prior notification to the Local Planning Authority."

(b) That no further modifications be made to the Plan in respect of this objection.

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9. TRANSPORT

9.1 Overview

9.1.1 In general I support the Council's Proposed Modifications and Further Changes. I do, however, recommend several alterations to take account of revised national planning policy. I suggest that a more wide-ranging re-evaluation of transportation issues be carried out as part of the Local Plan Review process.

9.2 Policy TR1 – The Road Hierarchy [Proposed Modification No TRAN/MOD1]

Recommendations

9.2.1 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD1.

(b) That no further modifications be made to the Plan in respect of this objection.

9.3 Policy TR2 – Safeguarding of Land for Future Road Proposals [Proposed Modification No TRAN/MOD2]

Recommendation

9.3.1 That the Plan be modified in accordance with Proposed Modification TRAN/MOD2, subject to Further Change 4.

9.4 Policy TR5A – Railfreight [Proposed Modification No TRAN/MOD5]

Recommendations

9.4.1 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD5.
(b) That no further modifications be made to the Plan in respect of this objection.

9.5 Policy TR8 – Off Street Parking Requirements [Proposed Modification No TRAN/MOD7]

Recommendations

9.5.2 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD7, subject to the following additional modification:

Policy TR8 be altered to read:

> **"Development proposals which do not make provision for off-street parking in line with the District Council's parking requirements will not normally be granted planning permission."**

(b) That the Car Parking Standards in Appendix 17 be reviewed to ensure that they comply with the Maximum Parking Standards set out in Annex D of PPG13.

(c) That no further modifications be made to the Plan in respect of this objection.

9.6 Policy TR13 – Alternative Modes of Transport [Proposed Modification No TRAN/MOD12]

Recommendations

9.6.3 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD12.

(b) That no further modifications be made to the Plan in respect of these objections.

9.7 Policy TR15 – Car Parking at Railway Stations [Proposed Modification No TRAN/MOD14]

Recommendations

9.7.9 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD14.

(b) That no further modifications be made to the Plan in respect of these objections.

9.8 Policy TR16 – Cycle Routes [Proposed Modification No TRAN/MOD15]

Recommendations

9.8.3 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD15.

(b) That no further modifications be made to the Plan in respect of this objection.

10. RECREATION

10.1 Overview

10.1.1 All of the Council's proposed modifications to this chapter of the Plan are supported.

10.2 Policy RAT4 – Retention of Open Space [Proposed Modification No RAT/MOD4]

Recommendations

10.2.4 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD4.

(b) That no further modifications be made to the Plan in respect of these objections.

10.3 **Policy RAT6 – Open Space Provision in New Residential Developments [Proposed Modification No RAT/MOD5]**

Recommendations

10.3.4 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD5.

(b) That no further modifications be made to the Plan in respect of these objections.

10.4 Policy RAT7 – Sports Hall Standards [Proposed Modification No RAT/MOD6]

Recommendations

10.4.3 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD6.

(b) That no further modifications be made to the Plan in respect of this objection.

10.5 Policy RAT 8 – Dual Use Facilities [Proposed Modification No RAT/MOD7]

Recommendations

10.5.1 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD7.

(b) That no further modifications be made to the Plan in respect of this objection.

11. RIGHTS OF WAY

11.1 Overview

11.1.1 The Council's proposed modification to delete Policy RAT14 is supported.

11.2 Policy RAT14 – Stopping-Up a Right of Way [Proposed Modification No RAT/MOD10]

Recommendations

11.2.1 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD10.

(b) That no further modifications be made to the Plan in respect of this objection.

12. TOURISM

12.1 Overview

12.1.1 I recommend a further modification to Policy RAT30 to make it less prescriptive.

12.2 Policy RAT30 – Caravan Storage [Proposed Modification No RAT/MOD25]

Recommendations

12.2.5 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD25, subject to the following additional modifications:

(i) Policy RAT30 be amended to read:

"New open storage facilities for touring caravans will not be acceptable in the Green Belt."

(ii) The explanatory text be altered to reflect this policy change.

(b) That no further modifications be made to the Plan in respect of these objections.

13. ENVIRONMENTAL SERVICES

13.1 Overview

13.1. Some further modifications of a relatively minor nature are recommended in respect of both policies and supporting text to clarify and correct where necessary, and to address recent changes in national planning policy.

13.2 PARA 14.5 – Sewerage Systems [Proposed Modification No ENV/MOD3]

Recommendations

13.2.5 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD3, subject to the following corrections:

(i) that the reference in the Schedule of Proposed Modifications (Document 3), be to Paragraph 14.5 (and <u>not</u> Paragraph 14.1).

(ii) that it be recorded that the change of title from 'Aquifer Protection Zone' to 'Groundwater Protection' relates to Policy ES4 only (and <u>not</u> Paragraph 14.5 of Policy ES3).

(b) That no further modifications be made to the Plan in respect of this objection.

13.3 Policy ES9 – Undergrounding of Supply Cables [Proposed Modification No ENV/MOD10]

Recommendations

13.3.3 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD10.

(b) That the explanatory text be modified to include a reference to SPG through which a list of priority locations for undergrounding works will be maintained.

(c) That no further modifications be made to the Plan in respect of these objections.

13.4 Policy ES13 – Development of Telecommunication Facilities [Proposed Modification No ENV/MOD12]

Recommendations

13.4.4 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD12, subject to the following additional modification:

Paragraph 14.15 be expanded to make reference to the government's approach to planning for telecommunications development and the guidelines contained in PPG8.

(b) That no further modifications be made to the Plan in respect of this objection.

13.5 Policy ES16 – Reforming of Land [Proposed Modification No ENV/MOD15]

Recommendations

13.5.4 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD15.

(b) That no further modifications be made to the Plan in respect of these objections.

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14. ALVECHURCH

14.1 Overview

14.1.1 I support the BDLP Inspector's recommendation that Alvechurch be inset from the Green Belt. I ratify the selection of ALVE6, ALVE7 and ALVE8 and reject other ADR proposals.

14.2 Policy ALVE1 – Removal of Alvechurch from Green Belt recommended by Inspector [Proposed Modification No AREA/MOD2]

Recommendations

14.2.3 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD2.

(b) That no further modifications be made to the Plan in respect of these objections.

14.3 Policy ALVE5 – Density Restrictions [Proposed Modification No AREA/MOD4]

Recommendations

14.3.3 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD4, subject to:

(i) the addition of a reference in the explanatory text to the Alvechurch Village Design Statement.

(ii) Correction 14.

(b) That no further modifications be made to the Plan in respect of these objections.

14.4 Policy ALVE6 – Areas of Development Restraint [Proposed Modification No AREA/MOD5]

Recommendations

14.4.1 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD5.

(b) That no further modifications be made to the Plan in respect of these objections.

14.5 Policy ALVE7 – Areas of Development Restraint [Proposed Modification No AREA/MOD6]

Recommendations

14.5.34 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD6.

(b) That no further modifications be made to the Plan in respect of these objections.

14.6 Policy ALVE8 – Areas of Development Restraint [Proposed Modification No AREA/MOD7]

Recommendations

14.6.16 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD7.

(b) That no further modifications be made to the Plan in respect of these objections.

15. BARNT GREEN

15.1 Overview

15.1.1 While supporting Barnt Green as a sustainable secondary settlement appropriate for accommodating some longer-term growth, I find site BG5 (Twatling Road) to be unsuitable as an ADR. I recommend its deletion in favour of land at Kendal

End Road. I reject other ADR proposals in the locality. Further minor modifications are recommended in respect of Policy BG4.

15.2 Policy BG4 and Para 16.4 – Retention of Character of Area [Proposed Modifications Nos AREA/MOD9 and AREA/MOD10]

Recommendations

15.2.5 (a) That the Plan be modified in accordance with Proposed Modifications AREA/MOD9 & AREA/MOD10 and Correction 15, subject to the following additional modifications:

(i) the Barnt Green inset map be drawn to a scale of 1:4000 or 1:5000 to show a greater extent of Policy BG4.

(ii) the final sentence of the explanatory text in paragraph 16.4 be altered to read "New development will be required to respect the character and density of immediate surroundings."

(b) That no further modifications be made to the Plan in respect of these objections.

15.3 Policy BG5 – Areas of Development Restraint [Proposed Modification No AREA/MOD11]

Recommendations

15.3.30 (a) That Proposed Modification AREA/MOD11 be not made.

(b) That no further modifications be made to the Plan in respect of these objections.

16. BEOLEY

16.1 Overview

16.1.1 I support the designation of an ADR at Ravensbank Drive, Beoley to serve the employment needs of Redditch.

16.2 Policy BE3 – Areas of Development Restraint [Proposed Modifications Nos AREA/MOD15 and AREA/MOD16]

Recommendations

16.2.3 (a) That the Plan be modified in accordance with Proposed Modifications AREA/MOD15 and AREA/MOD16.

(b) That Proposals Map 1 be altered in relation to the annotation of E3 to conform with the written statement which correctly states E2.

(c) That no further modifications be made to the Plan in respect of this objection.

17. BROMSGROVE

17.1 Overview

17.1.1 I support a concentration of ADR provision in and around Bromsgrove town, in recognition of its primacy in the District and its degree of sustainability. However, I do not favour all of the sites promoted by the Council. I conclude that BROM5 and BROM5B should be omitted. ADRs in those locations on the north and north-west margins of the town would erode the narrow Green Belt gap that separates Bromsgrove from Catshill-Marlbrook-Lickey End, the maintenance of which has been an object of planning policy for many years. By way of partial replacement I recommend that land west of Whitford Road be substituted. This would serve to redirect growth along an east-west axis rather than towards the Birmingham conurbation. The resultant reduction in ADR provision at Bromsgrove town, from 69.7% to 63.4%, would be made up by higher levels of development in some of the secondary settlements.

17.2 Policy BROM4 – Residential Development Sites [Proposed Modification No AREA/MOD19]

Recommendations

17.2.2 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD19.

(b) That no further modifications be made to the Plan in respect of this objection.

17.3 Policy BROM5 – Areas of Development Restraint [Proposed Modification No AREA/MOD20]

Recommendations

17.3.3 (a) That Proposed Modification AREA/MOD20 be not made.

(b) That the site of BROM5 be confirmed as Green Belt.

(c) That the Green Belt boundary in the vicinity of Birmingham Road be redrawn as shown on the plan accompanying objection 176/1077.

(d) That no further modifications be made to the Plan in respect of these objections.

17.4 Policy BROM5A – Areas of Development Restraint [Proposed Modification No AREA/MOD22]

Recommendations

17.4.19 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD22.

(b) That no further modifications be made to the Plan in respect of these objections.

17.5 Policy BROM5B – Areas of Development Restraint [Proposed Modification No AREA/MOD23]

Recommendations

17.5.28 (a) That Proposed Modification AREA/MOD23 be not made.

(b) That the site of BROM5B be confirmed as Green Belt.

(c) That no further modifications be made to the Plan in respect of these objections.

17.6 Policy BROM5C – Areas of Development Restraint [Proposed Modification No AREA/MOD24]

Recommendations

17.6.14 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD24.

(b) That no further modifications be made to the Plan in respect of these objections.

17.7 Para 21.8C – Areas of Development Restraint [Proposed Modification No AREA/MOD24]

Recommendations

17.7.3 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD24.

(b) That no further modifications be made to the Plan in respect of this objection.

17.8 Policy BROM5D – Areas of Development Restraint [Proposed Modification No AREA/MOD25]

Recommendations

17.8.25 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD25, subject to the following further modifications:

(i) the Green Belt boundary be redrawn to follow the line of the M5 motorway between Fockbury Mill Lane and Timberhonger Lane.

(ii) a strategic open space protection policy be applied:

a) to the land between the western boundary of BROM5D and the M5 motorway

b) to the land bounded by Kidderminster Road, Whitford Road, Timberhonger Lane and the M5 motorway (excluding the Hanover International Hotel and adjacent development).

(iii) the Proposals Map be modified (and corrected) accordingly.

(b) That no further modifications be made to the Plan in respect of these objections.

17.9 Policy BROM11 – Town Centre Zone [Proposed Modification No AREA/MOD28]

Recommendations

17.9.5 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD28.

(b) That no further modifications be made to the Plan in respect of this objection.

17.10 Policy BROM28 – Play Areas and Open Space [Proposed Modification No AREA/MOD41]

Recommendations

17.10.3 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD41 and Correction 18.

(b) That no further modifications be made to the Plan in respect of these objections.

---

18. FINSTALL

18.1 Overview

18.1.1 In the BDLP Finstall was identified as an area appropriate for limited infill under Policy DS5 and a Village Envelope was drawn around it. It is the definition of this Village Envelope on the ground that has caused concern to objectors. Questions have been raised as to whether all the relevant areas of Finstall have been incorporated within the Envelope and whether the Council made an error when they were re-drafting the Proposals Map in light of the previous Inspector's recommendations.

18.2 Policy FIN1 – Village Envelope [Proposed Modification No AREA/MOD44]

Recommendations

18.2.6 (a) That Proposed Modification AREA/MOD44 be not made.

(b) That the Village Envelope and Landscape Protection Area boundaries be drawn at the interface of the curtilage of 100 Finstall Road and fields 0002 and 0007.

(c) That no further modifications be made to the Plan in respect of these objections.

19. FRANKLEY

19.1 Overview

19.1.1 The majority of the urban area of Frankley has been transferred to the administrative control of Birmingham City Council. Bromsgrove District Council still retains control of the hinterland to the north and east of the settlement. In the BDLP a site was identified for the provision of an equipped children's play area due to the limited provision in Frankley. Whilst this site was not designated as an ADR in the Deposit version of the Plan, it has subsequently been identified by the Council for this purpose. Objectors have reiterated concern over the acknowledged shortage of formal open space in Frankley and consider that designation of FR4 as an ADR would further undermine this lack of provision.

19.2 Policy FR4 – Areas of Development Restraint [Proposed Modification No AREA/MOD48]

Recommendations

19.2.4 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD48, subject to the following additional modification:

The explanatory text to Policy FR4 be augmented to make clear the Council's continued parallel commitment to the provision of an equipped children's play area on part of the site in accordance with Policy FR3.

(b) That no further modifications be made to the Plan in respect of these objections.

20. HAGLEY

20.1 Overview

20.1.1 Hagley is identified under BDLPPM Policy DS4 as a settlement where limited development can occur during the Plan period.

20.1.2 To cater for possible longer-term development needs, the Council has selected 3 ADR sites on the outskirts of Hagley. Of those, HAG2 was endorsed by the BDLP Inspector, having previously been excluded from the Green Belt in the Hagley/Clent Local Plan adopted in August 1991. No further objections have been received to that designation. HAG1 and HAG2A are the concern of this inquiry. In October 2000, outline planning permission was granted on appeal for residential development of the majority of HAG1. In light of that decision, I recommend that the whole of the site be allocated for housing under Policy S2. HAG2A was not included in the Deposit Version of the BDLP although it has subsequently been identified as safeguarded land. I recommend that it be confirmed as an ADR and excluded from the Green Belt.

20.1.3 Elsewhere in my report I consider various 'omission' sites at Hagley. I recommend that land south of Kidderminster Road also be designated as an ADR.

20.2 Policy HAG1 – Areas of Development Restraint [Proposed Modification No AREA/MOD49]

Recommendations

20.2.7 (a) That Proposed Modification AREA/MOD49 be not made.

(b) That the whole of HAG1 be deleted as an ADR and allocated instead as a housing site under Policy S2. - the Proposals Map and Appendices 3A and 4 to be modified accordingly.

(c) That no further modifications be made to the Plan in respect of these objections.

20.3 Policy HAG2A – Areas of Development Restraint [Proposed Modification No AREA/MOD 50]

Recommendations

20.3.4 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD50, subject to the following additional modification:

The explanatory text be altered by substitution of the following for the 2nd and 3rd sentences of Paragraph 28.3:

"It has been designated as an ADR in accordance with the recommendations made by the Inspector holding the inquiry into the BDLP."

(b) That no further modifications be made to the Plan in respect of these objections.

21. WYTHALL

21.1 Overview

21.1.1 This composite settlement is located in the north-east sector of the District close to the administrative boundary with the Metropolitan Borough of Solihull. Two ADR sites are promoted by the Council in the Grimes Hill area, combined with support for an associated 'park and ride' facility in the vicinity of Wythall railway station. While accepting Policy WYT 10 (Park and Ride) and ADR site WYT15, I recommend that ADR site WYT14 be omitted and an alternative area of safeguarded land at Bleakhouse Farm be substituted. I do not support the very much larger ADR 'omission' site proposed at Shawbrook. I find in favour of the Council's proposal for a site for a new church in Silver Street.

21.2 Policy WYT10 – Park and Ride Facility at Wythall Station [Proposed Modification No AREA/MOD65]

Recommendations

21.2.10 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD65.

(b) That no further modifications be made to the Plan in respect of these objections.

21.3 Policy WYT11 – Site for New Church [Proposed Modification No AREA/MOD66]

Recommendations

21.3.3 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD66, subject to a modest enlargement of the site area on its southern side to accommodate essential facilities.

(b) That no further modifications be made to the Plan in respect of this objection.

21.4 Policy WYT14 – Areas of Development Restraint [Proposed Modification No AREA/MOD67]

Recommendations

21.4.22 (a) That Proposed Modification AREA/MOD67 be not made.

(b) That no further modifications be made to the Plan in respect of these objections.

21.5 Para 35.14 – Areas of Development Restraint [Proposed Modification No AREA/MOD67]

Recommendation

21.5.1 That no modifications be made to the Plan in respect of this objection.

21.6 Policy WYT15 – Areas of Development Restraint [Proposed Modification No AREA/MOD68]

Recommendations

21.6.11 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD68, subject to the following additional modification:

Paragraph 35.14 be numbered correctly and the text altered to read:

"An area of land to the west of the railway line and to the rear of development off Lea Green Lane is designated as an ADR. This accords with the principles recommended by the Inspector holding an inquiry into the BDLP to find more land capable of meeting future development needs in the District. This site was not, however, the subject of one of the original objections made to the Local Plan."

(b) That no further modifications be made to the Plan in respect of these objections.

22. APPENDICES

22.1 Overview

22.1.1 Appendices 2 and 3A list, respectively, the proposed Green Belt changes and the Areas of Development Restraint.

22.1.2 I examine objections made to some ADR 'omission' sites under Appendix 3A. While I recommend against many of those sites, I find in favour of land west of Whitford Road, Bromsgrove.

22.2 APPENDIX 2 – Green Belt Modifications [Proposed Modification No APPEND/MOD1]

Recommendations

22.2.5 (a) That the Plan be modified in accordance with Proposed Modification APPEND/MOD1, subject to the further modifications necessary to take account of the recommendations made elsewhere in this report in respect of ADR provision and changes to Green Belt boundaries.

(b) That no further modifications be made to the Plan in respect of these objections.

22.3 APPENDIX 3A – Areas of Development Restraint

Recommendations

22.3.79 (a) That Appendix 3A (Areas of Development Restraint) be included in the Schedule of Proposed Modifications, Document 3.

(b) That Proposed Modification APPEND/MOD11 be not made.

(c) That the error in Proposed Modification ENV/MOD3 set out in the Schedule of Proposed Modifications, Document 3, be corrected.

(d) That land off Whitford Road, Bromsgrove be designated as an ADR and excluded from the Green Belt.

(e) That Appendix 3A be revised, as set out below, to take account of the recommendations made in this report.

(f) That no further modifications be made to the Plan in respect of these objections.

APPENDIX 3A: AREAS OF DEVELOPMENT RESTRAINT

Policy	Location	Site Area
ALVE6	Land adjacent to Crown Meadow, Alvechurch	1.4ha
ALVE7	Land north of Old Rectory Lane, Alvechurch	1.1ha
ALVE8	Land south of Old Rectory Lane, Alvechurch	2.8ha
New ADR	Alvechurch Brickworks, Scarfield Hill, Alvechurch	2.4ha
New ADR	Land at Kendal End Road, Barnt Green	5.0ha
BROM5A	Land at Perryfields Road East, Bromsgrove	34.7ha
BROM5C	Land adjacent to Wagon Works, Bromsgrove	7.8ha
BROM5D	Land at Perryfields Road West, Bromsgrove	13.9ha
New ADR	Land off Whitford Road, Bromsgrove	26.0ha approx
New ADR	Land off Church Road, Catshill	6.1ha
FR4	Land off Egghill Lane, Frankley	6.6ha
HAG2	Kidderminster Road South, Hagley	10.5ha
HAG2A	Algoa House,Western Road, Hagley	1.6ha
New ADR	Land south of Kidderminster Road, Hagley	10.5ha
WYT15	Land at Selsdon Close, Wythall	3.1ha
New ADR	Land at Bleakhouse Farm, Wythall	6.0ha approx
	TOTAL	**139.5ha approx**

EMPLOYMENT RELATED AREA OF DEVELOPMENT RESTRAINT FOR REDDITCH

Policy	Location	Site Area
BE3	Ravensbank Drive, Beoley/Redditch	10.3ha
	TOTAL	**10.3ha**

PROPOSALS MAP

23.1 Overview

23.1.1 I recommend that the line of the Kidderminster-Blakedown-Hagley by-pass be shown on the Proposals Map.

23.2 PROPOSALS MAP

Recommendation

23.2.1 That the Plan be modified in accordance with Further Change 4 and the Proposals Map be altered accordingly.

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1. DISTRICT STRATEGY

1.1 Overview

1.1.1 This first chapter of the report deals with strategic matters. It sets the scene for consideration of objections to other District-wide Plan policies and the subsequent examination of area policies on a settlement by settlement basis. Given the history of local plan preparation at Bromsgrove it is inevitable that the focus is very much on the identification of sustainable locations for growth, ADR designation, and the confirmation/amendment of Green Belt boundaries.

1.1.2 I commence with an examination of issues considered at the Round Table Session held on 24 May 2001 attended by, amongst others, the House Builders' Federation and many of the national housebuilders active in the region. I conclude that the quantity of ADR land identified by the Council (141.6 ha, excluding the 10.3 ha employment-related ADR for Redditch) is likely to be sufficient to accommodate longer-term development needs well beyond the Plan period - to about 2021, and possibly beyond that - thereby satisfying PPG2 (Green Belts) requirements in respect of safeguarded land. The Council's general distribution of ADR land is supported. This provides for a concentration of ADRs on Bromsgrove town, the largest and dominant settlement in the District, with secondary growth at other sustainable settlements situated within public transport corridors on the conurbation side of the District. I look at the selection criteria used by the Council in its review of candidate ADRs and set out the basis on which I assess the suitability of objection sites. I recommend that land be designated as ADRs and excluded from the Green Belt at: the former Brickworks site, Alvechurch; south of Kidderminster Road, Hagley; Bleakhouse Farm, Wythall; Church Road, Catshill; and Kendal End Road, Barnt Green.

1.1.3 Other topics covered in this early section of the report include 'village envelope' settlements, planning obligations, sustainable development and enforcement of planning control.

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1.2 Round Table Session – Areas of Development Restraint

4/1002 The Hagley Estate

6/1002	The Hagley Estate
578/1002	The Hagley Estate
1258/1053	Mr J M Pashley
166/1074	The Bromsgrove Society
300/1075	Crest Homes Midlands Ltd
574/1244	J J Gallagher Ltd
1262/1382	Bryant Group
211/1385	Stansgate Planning Consultants (Various Clients)
1036/1386	House Builders' Federation
1037/1387	Bellway Estates
1044/1388	David Wilson Estates
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1052/1429	Westbury Homes (Holdings) Ltd
1064/1430	Persimmon Homes
1076/1432	Bovis Homes Ltd
1086/1433	Barratt West Midlands

(These objections also appear in the report under Policy DS8 [Proposed Modification No DS/MOD12])

Key Issues

1.2.1 (1) Whether (a) the BDLP should be abandoned and a new Plan prepared in accord with policies of the Worcestershire County Structure Plan 1996-2011, or (b) the Plan period should be extended to 2011.

(2) Whether 2016 is a suitable time horizon for ADR provision.

(3) Whether sufficient ADR land has been identified and justified in the explanatory text.

(4) Whether the overall geographical distribution of ADR land proposed is appropriate.

(5) Whether the Council's ADR selection process has been comprehensive and rigorous, subject of proper consultation and the choice of sites adequately explained.

(6) Whether ADR sites should be prioritised, phased or ranked in order of suitability.

(7) Whether ADR sites should be described in terms of gross area or net developable area.

(8) Whether there is a meaningful distinction to be drawn between 'interim' and 'confirmed' Green Belt in terms of ADR selection.

Inspector's Appraisal and Conclusions

1.2.2 **Issue 1:** The Council has explained in Background Paper 5 (Plans Relevant to Bromsgrove) the reasons why it is continuing to progress the BDLP to adoption, despite the fact that the Plan is time-expired with a nominal end date of March 2001. Amongst these is the strong encouragement being given by the Government Office for the West Midlands.

1.2.3 I agree that it is vitally important to see the process through to the end. Not only will this result in completion of district-wide local plan coverage of the county, which is an important government planning objective in itself, but it will confirm Green Belt boundaries for all parts of the District. This will afford greater certainty for all involved in the development process. Moreover, the establishment of Green Belt boundaries and the provision of safeguarded land to meet likely development needs well beyond the Plan period will, I am sure, reduce the time taken to undertake a Review of the Plan. I am told that such a Review has already started and is proceeding in parallel with the present procedures.

1.2.4 The BDLP has been prepared in the context of the Hereford and Worcester County Structure Plan 1986-2001, published in June 1993. It has received a certificate of general conformity with that Plan. During its later developmental stages consideration has been given to the substance of national and regional planning policy guidance as it has emerged. Moreover, regard has been paid to the thrust of policies contained in the now-adopted Worcestershire County Structure Plan 1996-2011 (published in June 2001) and to the detailed recommendations of the previous Local Plan Inspector. As recently as 27 February 2001 Worcestershire County Council confirmed that the Proposed Modifications would not give rise to a conformity problem. In these circumstances, and notwithstanding the extremely protracted evolution of the Local Plan over a decade or so, I see no compelling argument in favour of abandoning the Plan. A fresh start under the strategic umbrella of the new Structure Plan would be likely to prove another long and frustrating exercise. This would be extremely expensive both in terms of the work already done by the Council, much of which would be forfeited, and the continued inappropriateness of many of the Green Belt boundaries that are tightly drawn around the urban areas. Any additional delay in establishing enduring Green Belt boundaries would undoubtedly give rise to further pressure for undesirable ad hoc development.

1.2.5 As regards the suggestion of extending the Plan period to 2011 to be in line with the new Structure Plan, this would I feel be quite inappropriate given the policy base of the BDLP that is rooted in the earlier Hereford and Worcester County Structure Plan 1986-2001. To take this course of action would inevitably cause the Plan to be out of conformity with strategic policy.

1.2.6 **Issue 2:** The BDLP Inspector found the Council's ADR provision in the Deposit Draft to be severely inadequate. He concluded that the three ADRs proposed at BROM5, HAG 1 and HAG 2, together totalling 52.6 ha, would only be sufficient to last 4 or 5 years. This would not, in his view, be a reasonable interpretation of the phrase used in Annex B of PPG2 of "..well beyond the plan period". He recommended that the Council should aim to provide an absolute minimum of 15 years ADR supply beyond the current plan period - that is, to 2016.

1.2.7 The Council has accepted the Inspector's recommendation. It intends, through the Proposed Modifications, to identify sufficient ADR land to meet requirements up to a time horizon of 2016. None of the objectors, nor indeed the Council, support an earlier end date of 2011. The BDLP Inspector pointed out that such a date is only 10 years beyond the current plan period with the likelihood that well before then uncertainty about the Green Belt would recommence. I take a similar view. As regards 2016, the Bromsgrove Society and a number of individuals ally themselves with the Council. However, other objectors favour a minimum date of 2021 and a third group, including the House Builders' Federation, a date of 2026. All agree that the key consideration should be the permanence of the Green Belt boundaries; and that a fundamental long-term review is needed at this stage, rather than being left for a subsequent Review of the Local Plan.

1.2.8 This is a difficult judgement to make. On the one hand, too short a time horizon could result in the need for another review of Green Belt boundaries during the next plan period, contrary to the thrust of PPG2 advice in respect of safeguarded land. On the other hand, it is argued that an overly-generous ADR provision and end date could conceivably make the District a target for even greater pressures, encouraging future strategic planning exercises to allocate more than a fair share of development to Bromsgrove District in light of the area's apparent 'potential'. This would be contrary to concerns expressed in the recently published West Midlands Regional Planning Guidance Review consultation document that too much growth is taking place in the Shire Districts at settlements like Bromsgrove and Tamworth which are becoming dormitory settlements. Such a model of growth is now regarded as an unsustainable pattern of development for the conurbation. It could also discourage developers from properly examining urban capacity, contrary to PPG3 (Housing).

1.2.9 On balance, I consider that the most appropriate time horizon for ADR provision is 2021. This makes a moderate and proportionate allowance for the long delay experienced in actioning the BDLP Inspector's report. It would not, in my opinion, lead to an unreasonable degree of development pressure for several reasons. Firstly, ADR sites taken out of the Green Belt would remain subject to restrictive Green Belt policies. Secondly, Annex B to PPG2 makes it clear that planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development of particular areas of safeguarded land. Thirdly, new RPG will provide the

necessary spatial context for future decisions made at a strategic level. Fourthly, ADR land is capable of meeting longer-term employment needs as well as housing. Such land will be important in making settlements sustainable in their own right. And as regards urban capacity, the 'plan, monitor and manage' provisions of PPG3 should encourage developers to look firstly to previously developed land.

1.2.10 In reaching this conclusion I note the BDLP Inspector's view that a 15 years supply of ADR land was regarded as an absolute minimum requirement. He remarked that such a timescale was less than that suggested by Inspectors dealing with some other Local Plans. This was confirmed at the RTS when reference was made to 20 and 30 year time scales at Warrington and Wilmslow respectively. The BDLP Inspector also indicated, and I agree, that fear of 'pressure' alone would not be a good reason to avoid providing an adequate amount of safeguarded land.

1.2.11 The BDLP is already beyond its sell-by date. By the time the Local Plan is adopted a significant incursion will have been made into the next plan period. A number of objectors consider that because of this it would be more appropriate for the minimum 15 years period recommended by the BDLP Inspector to commence at the end of 2011. In my opinion this would project too far into the future and involve too much uncertainty. The lifespan of ADRs will depend upon a number of assumptions that can readily change. As the Council points out, the longer the projected period the more unreliable such assumptions become. A common sense position is called for. I conclude that a time-horizon of 2021 - that is, 20 years beyond the current plan period - would provide the necessary degree of flexibility and prudence to allow adjustment as planning policies change, without running the risk of serious over-provision.

1.2.12 **Issue 3:** This issue relates to the quantity of ADR land required. Unfortunately, no detailed guidance on a calculation method is set out in PPG2, RPG11 or the WCSP. Appendix 3A of the BDLPPM lists 15 ADRs, comprising a total of 141.6ha, plus a separate employment-related ADR for Redditch of 10.3ha. There is, however, no explanation given either in Policy DS8 itself nor in the supporting text of the way in which these figures have been derived.

1.2.13 The BDLP Inspector found that a 'broad brush' assessment was all that was needed for ADR purposes and concluded that to ensure long-term stability in Green Belt boundaries, and to provide an acceptable reserve of land for possible use up to at least 2016, there should be in the region of 230ha of ADR land (the equivalent of a little over 15ha per year over 15 years), excluding land specifically promoted for employment use in the Redditch area. In the absence of any clarification in the Inspector's Report, the Council has surmised that this total was based on the Inspector's view that the then current Hereford and Worcester County Structure Plan levels of development would prevail to 2016 – equating to 413.3 dwellings per annum.

1.2.14 When the ADR quantum issue was discussed at the Round Table Session the position was complicated by the Council having supplied fresh housing information in the immediate run up to the inquiry. The figures had been updated from October 2000 to a new base date of April 2001. Consequently, at the conclusion of the Round Table Session each of the objectors was invited to complete a matrix setting out their view on the quantity of safeguarded land required for time horizons of 2011, 2016, 2021 and 2026, split between housing and employment. That information is set out in Table 1 and summarised in Table 2 of the Notes of the Round Table Session. It demonstrates that there is a wide divergence of views. In the light of my conclusion on the appropriate ADR timescale, I intend to focus my examination on the period to 2021.

1.2.15 The total ADR provision to 2021 suggested by the various parties ranges from 124.2ha (BDC) to 266ha; the housing element from 90ha (BDC = 94.6ha) to 208ha; and the employment component from 29ha (BDC = 29.6ha) to 58ha. In the absence of a definitive method for ADR calculation, various approaches have been followed by the Council and the objectors. They fall into 3 main groupings - those objectors who support the Council's methodology; those who support the methodology promoted by the House Builders' Federation; and those who advocate a simpler, broad brush approach. I shallow briefly outline each in turn.

1.2.16 The Council's approach: The housing land supply is based on figures updated to April 2001. The methodology starts with the WCSP target for Bromsgrove District of 3950 dwellings. From this figure are subtracted completions to April 2001, small and large sites under construction, and outstanding planning permissions (reduced by 2% to take account of non-implementation, in accordance with the EiP Panel's recommendation). The remaining need to 2011 is 1169 dwellings. Windfalls based on contributions over the past 15 years are then deducted. This method shows the remaining dwellings needed to 2011 to be minus 581 which, in terms of land requirements at an assumed density of 20 dwellings per hectare, equates to minus 29 ha. If, however, the lower WCSP windfall allowances are substituted, that requirement increases by 65ha to plus 36ha.

1.2.17 A housing target of 2633 dwellings is then extrapolated for the period 2011-2021 derived from the WCSP target for 1996-2011. From that figure is subtracted a windfall allowance of 46.6 dpa (following the Structure Plan allowance of 50 dpa for 15 years for the life of the Structure Plan minus one year to accord with the EiP Panel recommendation). When combined with the figure for the period to 2011 and converted to land equivalents this gives a total ADR housing land requirement to 2021 of either 79.2ha (using evidence of previous windfalls) or 144.2ha (applying WCSP windfall allowances throughout).

1.2.18 For employment land supply the base date remains October 2000. The starting point is the WCSP employment target 1996-2011 of 55ha. From this figure are deducted commitments 1996-October 2000 to give a residual requirement to 2011

of minus 7ha. Projecting the WCSP target to 2021 and combining this with the surplus 7ha allowance from the previous period shows a remaining ADR employment land requirement to 2021 of 29.7ha.

1.2.19 Aggregating these housing and employment land statistics gives a total ADR requirement to 2021 of between 108.9ha and 173.9ha, depending upon windfall assumptions. Put another way, the ADR provision made by the Council through the Proposed Modifications would, on this analysis (and taking into account the planning permission already granted for residential development in respect of the majority of the HAG1 site), last until somewhere between 2019 and 2023. These figures do not correspond with those entered in the matrix by the Council at the RTS. The differences are not vast; they are explained by concessions made in response to criticisms of double counting of small and medium windfalls voiced during the session.

1.2.20 The HBF approach: Supported by a number of individual housebuilders, the HBF has put forward an alternative methodology. It accepts the Council's approach for the period 2001-2011. For the period beyond that (2011-2021), use is again made of the WCSP housing and employment targets but an allowance of 25% is applied for housing development on brownfield land, with the residual greenfield development determining the amount of ADR land required. This is done on the basis that most undeveloped land lies within the Green Belt. It is pointed out that while the WCSP gives an indicative figure of 40% total housing provision on previously developed land, it is most likely this figure will decline over time. This view had been advanced by the Council both in its submission to Issue 4 (The Distribution of the Housing Requirement) at the WCSP EiP and in Background Paper 2 (Areas of Development Restraint). Furthermore, the HBF decline to transfer the surplus of employment land into the period beyond 2011 on the basis that some employment allocations do not relate well to housing allocations, thereby justifying a surplus of employment land in the period 2001-2011. This gives a total ADR requirement to 2011 (RTS Table 2) of 192ha.

1.2.21 The broad-brush approach: Many of the other contributors to the RTS expressed concern about the level of detail being presented. They felt that precise calculations were inappropriate when looking so far ahead and that it would be more suitable for such information to be used in the Review of the Local Plan as a basis for releasing ADR sites as allocations. While the Council's initial treatment in its Background Paper 2 to the inquiry had been relatively broad-brush this had become progressively more detailed as the housing figures had been updated. That had led to confusion and argument both in respect of general methodology and more detailed aspects such as double-counting of windfalls.

1.2.22 It seems to me that it is neither necessary nor possible to be precise in calculating the amount of ADR land required to 2021. Crystal-ball gazing 20 years ahead is fraught with difficulty given the dynamic nature of the society in which we live and the range of assumptions that have to be made. Nevertheless, a new

Structure Plan is now in place to 2011 and it is possible to discern the early direction that a review of RPG is taking. Neither of these sources of information were available to the earlier Local Plan inquiry. They provide a basis for reviewing the figure of 230ha (to 2016) recommended by the BDLP Inspector.

1.2.23 There is a broad measure of agreement between the Council and many of the objectors as to the ADR calculation to 2011. This has been done in light of the WCSP housing and employment targets. Moreover, objectors generally support using the most up-to-date information available - in this case, housing figures revised to a base date of April 2001. The problem arises in the second half of the ADR period to 2021 where different assumptions have been made regarding the contribution of windfalls and brownfield land. As can be seen from RTS Table 2 such differences can be substantial. To my mind this emphasises the importance of a fairly flexible and broad brush approach.

1.2.24 While the HBF and others point to a decline in the availability of brownfield sites over time, the contribution of such sites should not be underestimated. The significance attached to the use of previously developed land at both national level and in the WCSP, together with the evidence of such sites continuing to come forward, some of which are on a potentially large scale (eg Garringtons, Bromsgrove), all point to a reduced need for taking land out of the Green Belt as ADRs. Appraising the situation in the round, I believe that the 140ha or so of ADR land identified by the Council, shown on the Proposals Map and listed in Appendix 3A, represents a broadly appropriate level of provision - albeit that it is required to satisfy ADR needs to about 2021, rather than 2016 as originally envisaged. That figure is virtually the mid-point between the totals derived from the alternative methods of estimating windfalls used by the Council. It follows that I consider the HBF calculations to be overly generous.

1.2.25 As regards the figures put forward by other parties, I do not support that which seeks to average the previous (HWCSP) and present Structure Plan (WCSP) targets. That is a very crude methodology which gives undue significance to historic trends. I take the view that the employment needs of Redditch are a special case. They have been singled out for separate treatment in the BDLP. I examine them, together with ADR housing needs for Redditch, later in my report when I conclude that any further provision for that town should be addressed following the review of RPG and any strategic steer provided.

1.2.26 Policy DS8 provides an explanation of the concept of ADRs, which are then listed in Appendix 3A. The Council argues that it is not necessary for a calculation of the quantity of safeguarded land to be set out in the body of the Local Plan, maintaining that once the amount and location of such land is decided the matter becomes one of historic interest. I do not agree. While it is inappropriate to go into considerable detail, I believe the supporting text should set out the period for which ADR provision is being made, an explanation of how the total quantity of such land has been arrived at, and the broad principles underlying the

geographical distribution and selection of particular ADRs, including the 'exceptional circumstances' that necessitate a revision to confirmed Green Belt boundaries. If the Council is concerned that this information will unduly clutter the text, then it can be accommodated by way of a further Appendix to the Plan. Without that basic information the Plan user is at a significant disadvantage. Such information is essential to enable monitoring of the Plan and, in particular, to inform decisions about the take up and management of ADR land.

1.2.27 Finally on this issue, it should be apparent that the ADR calculation is by no means an exact science. I have endeavoured to be as objective as possible in ensuring that adequate land is safeguarded. If anything, I have erred on the generous side given the Council's updated housing figures which, on one calculation, demonstrate sufficient ADR land to beyond 2021. But, as the BDLP Inspector emphasised, if the quantity of ADR land turns out to be in excess of that required, or if some of it is in the wrong place, or other policy considerations at the time indicate that a site should not be used, little harm is done. The land remains subject to the same development control policies as the Green Belt, and will continue to function in a similar way to the adjacent Green Belt. It will provide the necessary degree of flexibility. I note that the Council is not proposing to further reduce its ADR provision, even though the latest housing figures suggest a potential over-supply to 2016.

1.2.28 **Issue 4:** This concerns the distribution of ADR land. The Council has taken the BDLP Inspector's recommendations as a starting point. In Para 9.24 of his report the Inspector indicated that concerns for sustainability point towards consideration of ADRs firstly, at or adjacent to Bromsgrove town and, secondly, at locations which are close to both local facilities and rail links to the conurbation, such as Hagley, Alvechurch, Barnt Green and Wythall. In general, locations have been selected on the periphery of sustainable settlements within public transport corridors as defined by the County Council's Transport Corridors Study 1997. That distribution has paid due regard to the dominant role, or primacy, of Bromsgrove town where the majority (69.7%) of ADR land has been identified. More modest ADR provision has been made elsewhere in other sustainable settlements generally in proportion to their character, population size and the range of facilities on offer.

1.2.29 Such a spread is I believe consistent with RPG11 and broadly follows the search sequence now set out in PPG3 - that is, starting with the re-use of previously-developed land and buildings within urban areas identified by the urban housing capacity study, then urban extensions, and finally new development around nodes in good public transport corridors. This is in spite of the fact that PPG3 was published in March 2000, several years after the BDLP Inspector had reported, and some time after the Council had undertaken its ADR study. The distribution of ADRs also reflects the provisions of HWCSP Policy H2B and, most importantly, accords with the sustainability policies of the recently adopted

WCSP. The latter is a key consideration given the function of safeguarded land to yield potential development sites beyond 2001.

1.2.30 WCSP Policy SD.6 (Location of Development in Urban Areas) states, amongst other matters, that the majority of the outstanding development needs of the County to be met within the Structure Plan period will take place within or adjacent to the principal urban areas within the Central Crescent, namely Bromsgrove, Droitwich, Kidderminster, Stourport, Redditch and Worcester. Elsewhere in the Central Crescent development would be appropriate at other urban settlements if the criteria in Policies SD.4 and SD.5 can be satisfied. Policy SD.4 (Minimising the Need to Travel) indicates that proposals for development will normally only be allowed where they are located so as to minimise the need to travel, and where the development provides for access by different modes. In this respect development should generally be located in or adjacent to urban areas at nodes on transport corridors, particularly rail-based corridors, where frequent and attractive services are available or there is a realistic prospect that they will be available when development takes place. Policy SD.5 (Achieving Balanced Communities) provides that development proposals should help to sustain and improve the balance of housing, employment, community and social facilities in settlements, should maximise the use of existing infrastructure and self-containment and the building of communities.

1.2.31 Finally, WCSP Policy SD.7 outlines a sequential approach to the location of development in settlements covered by Policy SD.6, in the following order: (i) locations within the urban area on previously developed (brownfield) land which avoids damaging the quality of the environment; (ii) locations within the urban areas on greenfield land which avoids damaging the quality of the environment; (iii) locations adjacent to the urban area outside the Green Belt and adjacent to the urban area in Areas of Development Restraint; (iv) in exceptional circumstances, when all the options for locating development set out above, in sustainable locations, have been exhausted and where there exists a clear development need, locations adjacent to the urban area on land currently designated as Green Belt, where the purposes for which Green Belts were designated would not be compromised.

1.2.32 Consequently, like many of those attending the RTS I support, in principle, the Council's overall distribution of safeguarded land. That is not to say I consider the balance of ADRs between sustainable settlements like Hagley, Wythall, Alvechurch and Barnt Green to be exactly right, nor that the particular sites identified through the BDLPPM are the very best. I shall address the more detailed aspects later in my report when evaluating the relative merits of each ADR objection site.

1.2.33 A further aspect of ADR distribution raised at the RTS relates to the future direction of growth of Bromsgrove town. The Bromsgrove Society in particular is firmly opposed to any development to the north that would reduce the narrow

gap between Catshill/Marlbrook and Bromsgrove. The susceptibility of this land has been referred to on many occasions - most notably by the Secretary of State for the Environment when approving modifications and alterations to the HWCSP in 1990, when he indicated that development should generally be on an east/west axis; and by various Inspectors deciding planning appeals and reporting on called-in planning applications. I note that Paragraph 8.3 of the BDLPPM states that "The District Council fully supports the importance and function of the Green Belt and the Secretary of State's view that the future growth of Bromsgrove town should preserve the particularly narrow and vulnerable Green Belt gaps to the north and south of the town". I concur with that approach which I shall adopt as a guiding principle when examining site specific ADR proposals for the Bromsgrove policy area.

1.2.34 **Issue 5:** This relates to the adequacy of the Council's ADR site selection process. Having received the BDLP Inspector's report in early 1997, the Council undertook a wide-ranging ADR study later that year. Some 80 sites adjoining the principal urban areas of the District were examined against the following land use criteria - Green Belt status; impact on Green Belt; proximity to nearest urban area; proximity to railway station; agricultural land classification; biodiversity implications (such as the presence of a Site of Special Scientific Interest (SSSI) or Special Wildlife Site (SWS)); impact on built heritage and archaeology (such as a Conservation Area, Listed Building or Scheduled Ancient Monument); landscape quality; and impact upon aquifers. A weighted scoring system was devised against which each candidate ADR was assessed - such that the lower the score achieved, the better site.

1.2.35 The Council says that the resulting matrix was intended to act as a guide in the evaluation of alternative sites - a subjective tool to assist in comparing one potential ADR with another. It was not meant to be definitive. I note that neither the methodology nor the study itself have been subject to public consultation. The matrix output was only revealed to objectors as part of Background Paper 2 (Areas of Development Restraint) in the lead up to the inquiry. Moreover, the matrix was not presented to any of the Planning Committee meetings that selected the various ADRs being promoted through the Proposed Modifications.

1.2.36 Although it was generally agreed at the RTS that the Council had assessed an appropriate range of sites, the matrix itself and the weightings assigned to particular criteria were roundly criticised. Criticisms included the following:- errors and omissions (eg Sites 16A Dale Close, Catshill and 16B Hinton Fields, Catshill); inconsistencies and a failure to select some of the better scoring sites (and vice versa); distortion of scores through examination of larger tracts of land with localised poor features; inadequate consideration of more recent planning policy advice that puts greater emphasis on accessibility and sustainability (PPG3, PPG13); failure to make a distinction between matters of policy principle and those factors that could be mitigated at planning application stage (eg aquifers; Tree Preservation Orders); an over-emphasis on rail corridors at the expense of

bus corridors like the A38 (Bromsgrove – Birmingham); failure to properly discriminate in terms of scoring between best and most versatile agricultural land and that of lower quality; failure to discriminate between sites of national and local nature conservation interest; and undue weight given to 'interim' versus 'confirmed' Green Belt. An attempt was made by one RTS participant to produce an alternative matrix based on positive rather than negative scores.

1.2.37 I share many of the concerns expressed in relation to the Council's matrix. Consequently, I do not feel able to give the resultant scores substantial weight in my review of those ADRs promoted through the BDLPPM or put forward as 'omission' sites. When I consider site specific objections later in the report I shall make my own evaluation in 2 stages, along lines similar to those suggested by an objector at the RTS. The first part will involve an assessment against what I regard as the fundamental criteria of Green Belt purposes and sustainability. The second part will address any overriding site specific constraints that might exist. In doing this I shall bear in mind the guidance set out in Paragraphs B2-4 of Annex B of PPG2. This provides that safeguarded land should:

- be genuinely capable of development when needed;
- be located where future development would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development;
- take account of the advice on housing in PPG3 and on transport in PPG13;
- have regard to environmental and landscape quality;
- take account of the contribution which future development might make to remedying urban fringe problems, producing attractive, well-landscaped urban edges; and
- have regard to the advice in PPG7 on protecting the best agricultural land.

1.2.38 Finally on this topic, I can see that it would be impracticable for the explanatory text to set out the reasons why each ADR site has been selected. It would however be feasible, and in my view highly desirable, for the text to set out the general criteria that have been applied. Providing the Proposals Map identifies each ADR, I see no reason why sites should have to be be supported by a written description.

1.2.39 **Issue 6:** The question arises as to whether the ADRs identified in the Plan should be prioritised or phased in order of future release for development, and/or ranked in terms of their general suitability.

1.2.40 Most participants at the RTS were opposed to the prioritisation or phasing of ADRs. By its very nature safeguarded land or 'white land' is intended to last for a relatively long time ahead, well beyond the Plan period. It provides a pool of potential development land, sandwiched between the urban area and the Green Belt, from which greenfield allocations will ultimately be made. Given that

planning policies and other circumstances can and do change over time I think it would be inappropriate to commit the Council to the release of ADRs in any particular sequence or order of priority. This would pre-empt decisions that ought more properly to be taken at a later date in the context of the Local Plan Review and beyond, and in the light of factors then prevailing. Put another way, it would limit flexibility to implement the 'plan, monitor and manage' approach to site selection. For a similar reason that the relative merits of sites may change over time I also cannot support the ranking of ADRs in terms of their current suitability.

1.2.41 This has dealt with the issue on a general basis. A more specific objection has been lodged by a national housebuilder, seeking the prioritisation of housing ADRs in and around Bromsgrove. In furtherance of that objection reference is made to the search sequence described in PPG3 which has been incorporated in WCSP Policy SD.7. It is argued that such a sequence, taken in conjunction with WCSP Policy SD.6 (affording primacy to principal urban areas like Bromsgrove), supports the release of ADR sites BROM5, BROM5A, BROM5B, BROM5C and BROM5D in advance of development at other settlements in the District.

1.2.42 I cannot agree to this approach. There is nothing in planning policy guidance which would condone such prioritisation of safeguarded land. Indeed, the thrust of advice in Annex B of PPG2 would seem to work in the opposite direction - treating all ADR land on an equal basis as a simple resource of potential building land, keeping it free to fulfil its purpose of meeting longer-term development needs. Decisions as to which sites should be brought forward for development and in what order are clearly beyond the scope of the BDLPPM exercise. I would not seek to constrain in any way decisions on allocations that have to be made by the Council during subsequent plan periods. Neither is it necessary, in my view, to reiterate in the explanatory text in any degree of detail present government planning policy on sustainable forms of development, agricultural land quality and the sequential approach to be followed in allocating and releasing housing land - as variously suggested by other objectors.

1.2.43 **Issue 7:** This concerns the manner in which ADRs are described in the BDLPPM. Appendix 3A lists them according to gross site area. In contrast, Annex C of PPG3 advocates a net site density approach in allocating housing land in development plans. Furthermore, Paragraph 58 of PPG3 advises local planning authorities to avoid developments which make inefficient use of land (those of less than 30 dwellings per hectare net) and encourages housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net).

1.2.44 All parties at the RTS agreed that the density guidelines set out in PPG3 in respect of housing allocations are not directly applicable to ADRs. In quantifying the amount of safeguarded land required the Council has assumed an overall yield of 20 dwellings per hectare. This incorporates an allowance for the many and varied

site constraints likely to be encountered. These will inevitably dictate that some parts of some ADRs will not in practice be developable. In other cases they will inhibit higher densities being achieved. And as the BDLP Inspector remarked, an allowance should also be made for such matters as major distributor roads, primary schools, open spaces serving a wider area, significant landscape buffer strips and, most importantly, for the possibility that future circumstances or policy reviews may dictate that a particular site, although identified as an ADR, may not turn out to be appropriate at all for development. I am satisfied, as far as one can be at this very early stage, that the Council's 20 dph assumption will, when averaged throughout the Plan, not conflict with PPG3 guidance. This was also the view of most of those who attended the RTS. Actual housing densities will, of course, be controlled by detailed housing policies set out in the Local Plan Review.

1.2.45 In any event, some of the safeguarded land will need to be allocated for employment purposes or mixed-use developments. Consequently, detailed consideration of the capacity of individual ADR sites will not be possible until the Review of the Local Plan. In these circumstances it follows that I am unable to support the request that site details contained in Appendix 3A be amended to include both gross and net developable areas.

1.2.46 **Issue 8:** This relates to the distinction that is drawn by the Council between 'interim' and 'confirmed' Green Belt. This is of relevance to ADR selection given that the BDLP Inspector agreed with the Council's approach that one should look first at the interim areas, and allocate all 'reasonably acceptable' ADR sites. Then, if still more land is required, 'better' sites in confirmed areas should be taken in preference to any remaining poor sites in the interim areas.

1.2.47 The matter goes back a long way in time. The 1975 Amendment No 22 to the old County Development Plan showed some parts of Worcestershire as 'Green Belt' and other parts as 'Interim Green Belt' - the latter being those areas where final decisions about the extent of the Green Belt had yet to be made. While later structure plans established the general extent of the Green Belt, the precise boundaries were left to local plans. In Bromsgrove District some areas of Green Belt were confirmed in the old County Development Plan or through the subsequent adoption of Local Plans for Hagley/Clent, Wythall and Belbroughton. However, there remain today substantial areas within the District where detailed Green Belt boundaries have yet to be defined. Indeed, this is one of the main tasks of the present Local Plan exercise.

1.2.48 Some objectors argue that the terms 'interim' and 'confirmed' Green Belt no longer have any real meaning. They point out that neither the HWCSP nor the new WCSP use such words, and that the present RPG11 does not include a sequential approach to allocating land in the Green Belt. While that is indeed the case, I agree with the BDLP Inspector that what is important here is not the terminology employed but the distinction that can still be drawn. In my view that

difference cannot simply be ignored or treated as an anachronism. It is made clear in Paragraph 2.6 of PPG2 that where detailed Green Belt boundaries have been defined they should be altered only exceptionally. In contrast, the requirement to identify 'exceptional circumstances' does not apply when detailed boundaries are being set in a Local Plan for the first time. In those situations it is only necessary to establish boundaries that will endure and which do not include land that need not be kept permanently open.

1.2.49 I therefore reject the view put forward by a number of objectors that the distinction is irrelevant. But I equally refute any argument that the confirmed Green Belt is sacrosanct. While any ADR search should first look to interim Green Belt, better sites elsewhere cannot, in principle, be ruled out if they are clearly more sustainable. Like the BDLP Inspector I recognise that the use of some confirmed Green Belt is almost inevitable in a District like Bromsgrove where Green Belt boundaries have been tightly drawn around the urban areas for many years and where many of the brownfield sites will already have been exploited. But of far greater significance than this debate is the contribution that any particular ADR makes to the purposes of the Green Belt. Consequently, I shall give that factor the greatest weight when evaluating each of the ADR objection sites and looking to exclude land from the Green Belt.

1.2.50 In subsequent sections of my report I adopt the terms 'interim' and 'confirmed' Green Belt as a convenient shorthand.

Recommendations

1.2.51 That Paragraph 8.19 of the explanatory text be expanded (or a further Appendix introduced):

(v) explaining that ADR provision is being made to satisfy requirements to about 2021.

(vi) setting out how the total quantity of ADR land has been derived. This should equate to approximately 140ha.

(vii) outlining the factors that have determined the broad geographical distribution of ADRs.

(viii) identifying the criteria used in the selection of ADRs.

(v) specifying the 'exceptional circumstances' that necessitate a revision of confirmed Green Belt boundaries.

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1.3 Policy DS1 – Green Belt Designation [Proposed Modification No DS/MOD5]

3/1002	The Hagley Estate
5/1002	The Hagley Estate
248/1002	The Hagley Estate
51/1016	Weatherall Green & Smith (LPA Jt Receivers)
60/1018	Mr & Mrs Woolridge
110/1037	Trustees of David Cooke (Dec'd)
160/1071	Fairclough Homes Ltd
256/1106	Mr & Mrs K D Strawford
258/1108	Mrs P Holliday
965/1381	Billingham & Kite Ltd
1034/1386	House Builders Federation
1201/1402	Government Office for the West Midlands
53/1406	A C Boardman
56/1406	A C Boardman
261/1411	Mrs M Gwynne
932/1414	Messrs Pugh, McKernan, Archer & Moore
163/1434	Dr E Shaw
296/1075	Crest Nicholson Residential (Midlands) Ltd
1247/1441	A Johnson
1251/1444	Mrs S F Johnson & Dr R C Johnson
1277/1453	Bromsgrove Cricket, Hockey & Tennis Club

1.3.1 Key Issues

(1) Whether Alvechurch Villa Football Club ground should be designated as an ADR and the site and adjoining properties to the north included within the village inset to the Green Belt.

(2) Whether the Old Brickworks site, Scarfield Road, Alvechurch should be designated as an ADR - and, if so, where the Green Belt boundary should be drawn.

(3) Whether land south of Fiery Hill Road, Barnt Green should be included within the village inset boundary and taken out of the Green Belt.

(4) Whether land at Little Heath Lane, Lickey End should be designated as an ADR and excluded from the Green Belt.

(5) Whether land at Woodrow Lane, Catshill should be excluded from the Green Belt.

(6) Whether land at Old Birmingham Road, Lydiate Ash should be identified as an ADR and taken out of the Green Belt.

(7) Whether sufficient ADR land has been identified in the appropriate locations.

(8) Whether the Proposed Modifications adequately reflect national planning policy guidance set out in PPG3 (Housing).

(9) Whether land rear of 6 The Square, Alvechurch should be designated as an ADR and excluded from the Green Belt.

(10) Whether land rear of 2 Birmingham Road, Alvechurch should be designated as an ADR and excluded from the Green Belt.

(11) Whether land at Halesowen Road, Lydiate Ash should be identified as an ADR and excluded from the Green Belt.

(12) Whether land at The Fordrough, Wythall should be excluded from the Green Belt and included within the Wythall Inset as either (a) a location for residential development, or (b) an ADR.

(13) Whether land at Park Hall, Grafton Lane, Bromsgrove should be identified as an ASR and released from the Green Belt.

(14) Whether an appropriate level of ADR provision is made at Alvechurch.

(15) Whether land at Bromsgrove Cricket, Hockey and Tennis Club should be excluded from the Green Belt and identified as either (a) a location for residential development, or (b) an ADR.

Inspector's Appraisal and Conclusions

1.3.2 **Issue 1:** *(Alvechurch Villa FC ground)* Alvechurch is a large settlement located on the cross-city railway line (Redditch – Lichfield). It possesses a range of local facilities including shops. Because of its size and sustainability credentials the BDLP Inspector recommended that it be removed from the Green Belt and limited ADR provision be made to cater for possible long-term development beyond the Plan period.

1.3.3 The 1.5ha Alvechurch Villa Football Club ground lies to the south of the village on the east side of Redditch Road beyond the village boundaries shown on the BDLPPM Proposals Map. It is one of 7 sites at Alvechurch that the BDLP Inspector recommended for consideration as part of a comprehensive ADR study - including the adjoining, much larger site at Lye Meadows.

1.3.4 Looking first at Green Belt purposes, I share the Council's concern that development of the site would lead to an unacceptable degree of encroachment into the surrounding countryside. Unlike the ADRs selected by the Council

(ALVE 6, 7 and 8, totalling 5.3ha), the land is divorced from the main, tightly-knit area of the settlement and separated by a ribbon of semi-rural development flanking Redditch Road. That linear development would be consolidated and extended by this ADR proposal at the expense of the rural environment. While the site has obvious defensible boundaries, being flanked by existing housing to the north, the Lye Bridge industrial area to the south and the sewage treatment works and a belt of trees to the east, it does serve to maintain a link between open land to the west and north-east. In my opinion this function makes it unsuitable for development in isolation. It is apparent that the main reason why the BDLP Inspector recommended the site for consideration as a potential ADR was its proximity to and relationship with the Lye Meadows site - which the Council does not support.

1.3.5 The objector has suggested that the village envelope be extended southwards to accommodate the football ground and other existing development, and that the Green Belt boundary be adjusted accordingly. This would not, in my opinion, be appropriate even though it would bring a greater proportion of existing development within the settlement limits and, arguably, have policy benefit in terms of encouraging improvements to the adjacent industrial site. Such modifications would significantly change the compact form of Alvechurch. Over the course of time, further infilling and development in depth would be likely along the roads leading into and out of the village. This would harm the established loose-knit pattern of residential development in the locality, urbanise the surroundings and be poorly related to the main settlement concentration.

1.3.6 Turning to other matters, the site has a number of claimed advantages and benefits in terms of ADR designation. Firstly, in terms of accessibility, it is only 800m or so from the centre of the village, and relatively close to the railway station. There is an existing bus service along Redditch Road. Secondly, unlike ALVE 7 and 8 in particular, the land has no obvious agricultural value, nor any biodiversity features. Thirdly, Alvechurch is well-served with sports pitches having, at present, more than twice the minimum target of 7ha (based on the 1991 census and the NPFA 'Six Acre Standard'). Loss of this football ground would therefore be of little consequence. Fourthly, development of the site would secure the removal of floodlighting pylons that are visually intrusive when viewed from the village and the A441, as well as the supporters' stand and clubhouse.

1.3.7 These are material considerations to be weighed in the balance, as indeed are the accepted differences between this site and the adjoining Lye Meadows site which were scored jointly in the Council's ADR study. However, it is necessary to examine the proposal in a comparative context. Like the current objection site, ALVE6, 7 and 8 are all located within a recognised public transport corridor being within the 5 minute drive isochrone of Alvechurch railway station and on a regular bus route. I note, however, that the alleged greater proximity of the objection site to the railway station by road makes no allowance for the fact that part of the route utilises School Lane which is single track and one way. As

regards accessibility to the village centre, ALVE7 and 8 are a little closer but all of the sites are within reasonable walking distance.

1.3.8 In terms of the visual benefits claimed these would I feel be more than offset by development on the scale proposed which could be either housing or employment. Even taking a conservative view (based on a housing yield of 20 dwellings per hectare), the visual impact of some 30 houses when seen from the south would be significant. The openness of this green space, which fulfils a clear Green Belt function, would be replaced with a vista of buildings.

1.3.9 Consequently, my overall conclusions are that while sustainable in character this objection site does not perform as well as those selected by the Council, and that the exceptional circumstances necessary to alter confirmed Green Belt boundaries do not exist here. I do not therefore recommend the site either as an ADR or, in conjunction with adjacent properties, for inclusion within the village boundary inset to the Green Belt.

1.3.10 **Issue 2:** *(Alvechurch Brickworks)* The objection site extends to 2.41ha. It consists of an old marl excavation, situated on the western edge of Alvechurch village, enclosed by wooded cliffs up to 20m in height that effectively screen the land from the north, south and west. The land is separated from the village by the Worcester to Birmingham Canal, a narrow field and an embanked section of the Redditch to Lichfield railway line. It is currently used for the storage of vehicles, in accordance with a planning permission granted in 1950, with parts of the former brickworks' buildings in process of being converted to residential use. Vehicular access is obtained from the south via a track shared with other properties, leading off Scarfield Hill. Although the site is split into 2 land holdings it was agreed during the course of the inquiry that it would be prudent to treat the objection as though it relates to the whole.

1.3.11 As I have previously indicated, Alvechurch is a sizeable village located in a rail transport corridor. It possesses a reasonable range of services and facilities and is therefore a sustainable settlement. ADR provision here would accord with WCSP Policies SD.6, SD.4 and SD.5. The BDLP Inspector identified it as a suitable location for ADR provision and recommended that it be inset from the Green Belt. To that end the BDLPPM removes Alvechurch from the Green Belt, identifies a settlement boundary and provides 5.3ha of ADR land through Policies ALVE6, 7 and 8.

1.3.12 The objection site lies outside the proposed village limits. By virtue of the definition of previously developed land given in Annex C of PPG3 it can be classified as a brownfield site. The land was not, however, one of the sites examined by the BDLP Inspector, nor by the Council when it undertook its District-wide review of potential ADR land. Moreover, the matrix used by the Council as an assessment tool did not include a criterion relating to previously developed land, although it did have a 'redevelopment site' category.

1.3.13 Paragraph 30 of PPG3 and WCSP Policy SD.7 both set out a sequential approach to sourcing housing land. In general, the advice is that consideration should be given first to the re-use of previously developed land and buildings within urban areas identified by urban housing capacity studies, then urban extensions and finally new development around nodes in good public transport corridors. While the objection site does not fall neatly into any of those categories, I agree with the Council that such a brownfield site on the edge of an urban area and well served by public transport does indeed offer a sustainable location making it suitable in principle as an ADR.

1.3.14 The objector has assessed the objection site using the proforma matrix devised by the Council. This results in a very low score indeed of just 5 points, conceded by the Council's witness at the inquiry, demonstrating its potential suitability as an ADR. As regards Green Belt purposes, I am satisfied that development of the site would not result in coalescence of Alvechurch with any other settlement, neither would it cause sprawl of a large built-up area. The site is well-contained with strong defensible boundaries that limit encroachment into the countryside and minimise any loss of openness. I note that the contribution the site makes to the Green Belt was assessed by the Council in 1999 in the context of a retrospective planning application for the retention of storage buildings on part of the land. The committee report states that: "So far as the Green Belt is concerned the location of these two buildings would not, in my opinion, affect the openness. Furthermore, the whole site is within the confines of the Old Brickworks which, at the western end, is a steep scarp, indeed the whole site contributes very little to the Green Belt and is, in effect, a brownfield site within the Green Belt."

1.3.15 The site is approximately 0.27km from Alvechurch railway station. This is within easy walking distance and a considerable advantage, in accessibility terms, over the ADRs promoted by the Council at Alvechurch. Trains to both Birmingham and Redditch are frequent, quick and operate until late at night. They also pass through major employment centres. And there is also a limited bus service. While facilities at the centre of the village are somewhat further away, at approximately 1 km distance, they are not remote. There are also other potential benefits I see in terms of sustainability and national planning policy set out in PPG2 (Green Belts), PPG7 (The Countryside – Environmental Quality and Economic and Social Development) and PPG 23 (Planning and Pollution Control). They include an opportunity to remedy urban fringe problems by securing a long-term improvement in the appearance of the site and the ability to address any contamination issues that may have arisen from the presence of hydrocarbons. The proposal has the support of the local MP.

1.3.16 The Council contends that the area to the west of the canal and railway line forms a strong setting to the historic character of Alvechurch. It is argued that redevelopment with some 50-70 dwellings, extending to a depth of approximately 200m, would have a greater impact on the openness and visual amenities of the Green Belt than the existing use. However, this is not a view shared by

Alvechurch Parish Council. The Parish Council says that although the land is outside the proposed village envelope the benefits of using this derelict brownfield site would far outweigh any Green Belt objections. It would make a local eyesore more attractive and reduce the risk of large car transporter vehicles travelling along the local roads. I take a similar position and conclude that this is an appropriate ADR which is highly sustainable and which would not seriously compromise Green Belt purposes. Moreover, the Highway Authority has confirmed that it raises no highway objection, notwithstanding substandard visibility at the junction of the shared access road with Scarfield Hill. As regards breaching the north-south line of the railway, which the BDLP Inspector considered a strong defensible boundary, a precedent of sorts has already been set by the Council in not dissimilar circumstances, through the proposed designation of BROM5C (land adjacent to the former Wagon Works, Bromsgrove).

1.3.17 One of the Council's major concerns in respect of this site relates to the proposed Green Belt boundary. While it is acknowledged that the former Brickworks themselves have defensible boundaries (in terms of paragraph 2.9 of PPG2), the particular Green Belt boundary suggested by the objector captures a band of open land that would need to be protected from development by an open space protection policy. That area covers 2.48ha, extending over a straight line distance of more than 400m. They say that this would conflict with the advice set out in Tapping the Potential which indicates that settlement envelopes should be drawn to avoid including significant tracts of open countryside.

1.3.18 I can appreciate the Council's concern. However, it seems to me that in order to exploit the obvious potential of this brownfield site some compromise is necessary. The open land in question is not so very extensive in area. It comprises a long and narrow field used for grazing, sandwiched between the railway line and canal. This provides an attractive setting to the canal and an obvious visual amenity. The canal is an important recreational resource, with a large boat-hire marina situated nearby just to the south of Scarfield Hill bridge. In these circumstances I feel it would be appropriate to invoke a new strategic open space policy designed to protect the land from inappropriate built development. Alternatively, the Council could rely on BDLPPM Policy RAT4 (Retention of Open Space), supplemented by the provisions of Policy S7 and planning policy guidance on the defence of open space set out in PPG3. The former states that: "The District Council will seek to retain and enhance all public and privately owned open space of recreational and amenity value. Development of open space will only be considered where it can be clearly demonstrated that there is unlikely to be any long-term need to retain it for either recreational or amenity purposes." Policy S7 sets out criteria for residential development outside the Green Belt. Criterion f) requires that any proposal should not involve the loss of open space which it is desirable to maintain. My preference, however, would be for an altogether new policy. I recommend accordingly. Given the particular circumstances that exist here, I see no serious conflict with the general advice set out in Tapping the Potential.

1.3.19 As regards the detailed Green Belt boundary, I feel this should follow the objector's suggestion shown on Plan 1 in the Appendices to the Chapman Warren Proof (O/DS1-DS/MOD5/60/1018/ACB/1-APP), subject to the omission of land west of the canal, south of the Brickworks. I do not support the Council's proposed amendment which would include further land between the canal and railway line to the north of the blue hatched area, extending as far as the next road.

1.3.20 I conclude therefore that the former Brickworks site should be designated as an ADR and that the Green Belt boundary should be re-drawn as I have indicated. The exceptional circumstances necessary to justify altering Green Belt boundaries have been satisfactorily demonstrated in this case. This begs the question of whether the site should substitute for one or more of the other Council-promoted sites in Alvechurch or be treated as additional provision. I deal elsewhere in my report with objections in respect of ALVE6, ALVE7 and ALVE8. Like the current objection site these have certain advantages and disadvantages. On the one hand, they are greenfield in nature, involve the loss of some best and most versatile agricultural land, and are located at a greater distance from the railway station. On the other hand, the sites are generally closer to the centre of the village and the majority of its facilities, have better bus services and all are within the 5 minute drive isochrone. My overall view is that in the context of the District-wide level of need I have identified, the importance of achieving a degree of flexibility, and the size of Alvechurch and its sustainability credentials, there is no imperative to delete any other safeguarded land in the village. The issue of which site should be released first, or indeed at all, is obviously a matter for consideration in the Local Plan Review or beyond.

1.3.21 **Issue 3:** *(Land south of Fiery Hill Road, Barnt Green)* The land in question extends between the rear boundaries of properties along Fiery Hill Road, marking the current limits of Barnt Green settlement, and the railway line. The objector argues that extending the village in this direction would allow further housing land to be released in a location that is sustainable, being within easy walking distance of Barnt Green railway station. This would help keep the village alive by improving the trading potential of local shops in support of Policy BG1. Moreover, such additional housing could be made to protect the special character of the adjoining BG4 Policy area. The land is said to be held in small lots and uneconomic for agricultural use. Screening could be provided to both the railway and the M42 which would also form defensible boundaries.

1.3.22 It is clear that sufficient land has been identified to meet current housing requirements and to satisfy the strategic housing target. Moreover, the Council has put together a package of ADR proposals to accommodate longer-term development needs beyond the Plan period by rolling back the Green Belt boundaries to new positions intended to have a degree of permanence. Some of that provision is made at Barnt Green. Consequently, there is no imperative to extend the village limits to identify additional housing sites.

1.3.23 The objection site is extensive in area, occupying a section of countryside surrounding Barnt Green on its southern side. This open land assists in separating the settlement from the village of Blackwell/Linthurst. It forms a significant visual gap which extends as far as the M42 motorway. I am concerned that future development in this sensitive location would conflict with the Green Belt purposes of safeguarding the countryside from encroachment and preventing the merging of neighbouring settlements.

1.3.24 While acknowledging the sustainability of this location relative to the various facilities located in the centre of Barnt Green, including the railway station, I do not believe that accessibility alone is of such import as to outweigh the Green Belt concerns I have identified. Likewise, I attach only limited significance to the economic advantages of new housing, the difficulties of farming the land, and the ability to screen and control the form of development that takes place. To my mind the exceptional circumstances necessary to alter confirmed Green Belt boundaries have not been demonstrated.

1.3.25 Consequently, I conclude that this vulnerable site should not be taken out of the Green Belt and that it should not form part of the Barnt Green inset. I note that this was also the view of the BDLP Inspector who indicated that it was necessary to exercise extreme caution in relation to any proposals which could lead to further incremental, southern extension of the development boundary of Barnt Green.

1.3.26 **Issue 4:** *(Land at Little Heath Lane, Lickey End***)** The objection site is flanked to the west by the Meadow Vale residential development at Lickey End. To the north, beyond a belt of trees, is the M42 balancing pond, with the motorway itself on embankment further to the north. A horticultural nursery and garden centre is located to the east, separated by existing trees. The site, which extends to 1.3ha, lies in interim Green Belt and was recommended by the BDLP Inspector for consideration as a possible ADR.

1.3.27 The objector claims that insufficient ADR land has been safeguarded in the District to allow for longer-term development needs beyond the Plan period. Lickey End is seen as a sustainable location in which to make some provision. It is argued that exclusion of this site from the Green Belt would not undermine the purposes and objectives of the Green Belt. In particular, development would not encroach into the countryside given the nature of the site boundaries.

1.3.28 I have already addressed the question of need for ADR land in my response to those objections dealt with at the RTS. I have taken into account, amongst other matters, the changed circumstances arising from the new housing and employment targets of the WCSP and the increased emphasis in PPG3 and RPG11 on using brownfield land. My overall conclusion and recommendation is that the safeguarded land identified by the Council through the BDLPPM (approx

140ha) is sufficient to last until somewhere between 2019 and 2023. There is therefore no compelling need for additional ADR provision.

1.3.29 Notwithstanding the BDLP Inspector's comments, which were made in the context of a search for some 230 ha of ADR land, the objection site is not in my view a strong contender to displace the Council-promoted sites. It lies within but at the very edge of the 5 minute drive isochrone of a railway station and would significantly encroach into countryside surrounding Bromsgrove, linking the urban area proper with the adjoining nursery and garden centre. It contributes to the openness of the Green Belt. While nearly all ADRs involve a measure of encroachment, the impact here would I believe be disproportionate to its housing yield.

1.3.30 **Issue 5:** *(Land at Woodrow Lane, Catshill)* The objection site is situated on the northern, conurbation side of Catshill. It comprises land currently used for both grazing and arable farming, designated as interim Green Belt. The land falls to the south-west from a gentle ridge. The site is contained by Woodrow Lane to the west, by the rear boundaries of houses fronting Birmingham Road and the Hilton Hotel to the east and south-east respectively, and by recent housing development to the south, formerly known as the Horsecourse (BROM4).

1.3.31 This objection seeks exclusion of the site from the Green Belt in order to meet the District's future housing needs. However, the Council's latest Housing Land Availability information demonstrates that the housing requirement for the current Plan period to 2001 has been met through allocations and windfalls and that much of the housing land supply needed in the next Plan period to 2011 is already in place. In these circumstances few of the ADRs proposed through the BDLPPM are likely to be required for some considerable time.

1.3.32 I note that this site was recommended for consideration as an ADR by the BDLP Inspector. However, that was done in the context of the HWCSP targets which he believed would prevail. In the event, the WCSP has adopted much lower targets reducing the need for ADR provision. Rather than the 230ha required to 2016, I have concluded that the 140ha or so proposed by the Council will last to about 2021. There is therefore no need to identify additional ADR land, over and above the quantity already indicated in the BDLPPM .

1.3.33 The objection site does not in my view compare favourably with many of the sites promoted by the Council through the BDLPPM. The site fulfils 2 Green Belt functions. It assists in safeguarding the countryside from encroachment and serves to check the unrestricted sprawl of the built-up area. Both of those purposes would be compromised by designation of the site as an ADR. At the present time Catshill is contained by its landform such that the settlement cannot readily be seen when approaching from the north. That situation would change if this site was to be developed. While the ridge across the northern part of the site would obscure some of the development, other sections would still be visible.

More importantly, the northerly hedge does not form a strong defensible boundary to the Green Belt. I have no doubt that there would be future pressure for further development to the north, eventually taking up the whole of the area between Woodrow Lane and the A38 Halesowen Road. Paragraph 21.4 of the BDLPPM makes clear the Council's intention that the northern boundary of the BROM4 site will form the limit to development in this area north of Bromsgrove.

1.3.34 Turning now to matters of sustainability, the site lies beyond the 5 minute drive isochrone of the closest railway station at Barnt Green. It does not therefore fall within a rail-based Transport Corridor. While regular and frequent bus services are available along the A38 and elsewhere, an ADR in this location would not provide the choice of modes of travel that is generally the hallmark of an ADR.

1.3.35 I conclude therefore that there are compelling reasons, particularly on Green Belt grounds, why the objection site should not be excluded from the Green Belt and designated as an ADR.

1.3.36 **Issue 6:** *(Land at Old Birmingham Road, Lydiate Ash)* The objection site comprises a parcel of land situated north-east of junction 4 of the M5 motorway on the eastern side of the Old Birmingham Road at Lydiate Ash.

1.3.37 The objector contends that the ADRs identified in the BDLPPM are insufficient to meet the recommendations of the BDLP Inspector or are inappropriate for future development and that the objection site should be substituted.

1.3.38 Like the Council I have surmised that the quantum of ADR land derived by the previous Inspector was based on a forward projection of the HWCSP targets for the District. This led the BDLP Inspector to recommend a minimum provision to 2016 of 230 ha. In the event, the recently adopted WCSP sets much lower targets for Bromsgrove District. That more recent information has been employed by the Council who now propose, through the BDLPPM, to designate 141.6ha of safeguarded land to last until 2016. My own review of that calculation and other methodologies, based on housing figures updated to April 2001, leads me to conclude that such provision would last well beyond that date to somewhere between 2019 and 2023. In these circumstances I am satisfied that no additional quantity of ADR land is required.

1.3.39 Likewise, I am content with the broad distribution of ADR land promoted by the Council. The majority of that growth is centred on Bromsgrove town, being the largest and most sustainable settlement in the District. All of the ADRs proposed fall within the 5 minute drive isochrone of the nearest railway station specified in the Hereford and Worcester Transport Corridors Study.

1.3.40 In contrast, the objection site lies in open countryside outside the 5 minute drive isochrones of Barnt Green and Longbridge railway stations and is physically divorced from the urban areas and local facilities of Catshill, Marlbrook and

Rubery. Moreover, the proximity of the site to a junction of the M5 is likely to encourage car-borne travel and discourage the use of public transport, contrary to the advice in PPG3 (Housing) and PPG13 (Transport). This is clearly not a sustainable location in terms of access to public transport, choice of transport mode, employment or other services and facilities.

1.3.41 Turning to Green Belt considerations, the site is located in an area of confirmed Green Belt where boundaries have already been drawn. In altering Green Belt boundaries it is therefore necessary to identify 'exceptional circumstances'. The objection site occupies part of the vulnerable and relatively narrow gap between the northern limits of Catshill and the southern edge of the Birmingham conurbation. Although there exists a loose scattering of dwellings nearby, the overall impression gained is one of open countryside. In my opinion the site performs a clear Green Belt function of preventing piecemeal encroachment into the surrounding rural area. It also contributes to preventing neighbouring settlements from merging with one another.

1.3.42 In terms of visual amenity, the land is in an elevated position. It forms part of the foreground to Beacon Woods which comprise a section of the Lickey Hills. As such, development of the site would harm both the Area of Great Landscape Value and the Landscape Protection Area, contrary to WCSP Policy CTC.2 and emerging BDLPPM Policy C4.

1.3.43 I conclude that there are no exceptional circumstances that would support altering the Green Belt boundary in this location and that inadequate justification has been made for designating this site as an ADR.

1.3.44 **Issue 7***:* The question of whether the Council has identified sufficient safeguarded land in appropriate locations in the District has already been addressed through my conclusions and recommendations in respect of objections heard at the RTS. In this section I deal briefly with related matters which have not previously been covered.

1.3.45 Objection 965/1381 is supported by an alternative ADR study, prepared in 1997, on behalf of the objector. Like the Council's methodology it employs a transport corridor approach based on settlements possessing a railway station. Individual site evaluations have been made using an environmental appraisal matrix. However, a number of weaknesses and inconsistencies are evident which have been highlighted by the Council and with which I generally concur. First and foremost, the study was undertaken several years ago before the advent of current Regional Planning Guidance, PPG3 and the WCSP. The assumptions made and data used derive from information available at that time, predicated on a search for some 230ha of safeguarded land. Only in a letter accompanying the objection is account taken of the lower WCSP targets, with the suggested provision reduced to 141ha. This quantum equates with the Council's proposals set out in the BDLPPM. Secondly, the methodology uses a 'gravity model' based on work

trips outside the District to define an optimum travel pattern and ADR distribution throughout the transport corridors. This ignores the established pattern of settlement and, arguably, places too great an emphasis on transport corridors at the expense of other important factors and the broader needs of an area. The results indicate that 42% of all ADR provision should be made at Wythall and none at Barnt Green. Thirdly, the environmental assessment uses a rather crude 1km distance from the railway stations, except in the case of Bromsgrove town where no particular search area has been identified. Notwithstanding the ECOTEC report, I believe that a more meaningful and refined measure would have been travel time distance. Fourthly, the filtering system used in the matrix rules out many sites at a relatively early stage in the evaluation process, making a true comparison of all sites against all the environmental criteria impossible. Finally, there is no explanation of why certain sites that perform better than others have not been selected. In summary, I believe that this exercise cannot be relied upon as a decision making tool. Like the Council's own ADR study it should be treated as an aid to making more informed judgements and nothing more.

1.3.46 In the objector's letter of 27 September 2000 a revised pattern of ADR land is set out, totalling 141 ha. This is distributed as follows - Bromsgrove 66%, Alvechurch 12%, Hagley 12% and Wythall 10%. No provision is made at Barnt Green in light of the environmental constraints that apply there and PPG3 advice which requires higher densities to be achieved. It is claimed that this spread of ADRs avoids high quality agricultural land and ensures that all sites are within 1km of a railway station. I note that in the case of Bromsgrove town, it has been necessary to utilise some areas within the Landscape Protection Area. The Wythall contribution is lower than the strategic ideal referred to in the 1997 study to achieve a higher degree of sustainability. In consequence, the suggested allocation is higher than originally envisaged at Bromsgrove town.

1.3.47 The overall distribution of ADRs now promoted by the objector is not so very different from that proposed by the Council in the BDLPPM if allowance is made for the non-designation of safeguarded land at Barnt Green and Frankley. Under the Council's proposals the following spread is achieved - Bromsgrove 69.7%, Alvechurch 3.7%, Hagley 10.6%, Wythall 5.8%, Barnt Green 5.5% and Frankley 4.6%. However, I cannot support the objector's stance in respect of Barnt Green. While the character of that area makes the achievement of higher densities more problematical, Barnt Green is a sustainable settlement worthy of some ADR provision. To do otherwise would fly in the face of the previous Inspector's conclusions and recommendations and the strategic direction given by WCSP Policy SD.6 Likewise, I consider that some limited ADR provision is appropriate at Frankley.

1.3.48 As regards the 2 specific sites put forward by the objector in the 1997 study, I note that Site 107, Broadwaters Drive, Hagley, is already an allocated ADR in the Hagley/Clent Local Plan. It is not part of the current Modifications inquiry. Site 111, land north of Middlefield Lane, is subject of some confusion as to whether it

was considered by the BDLP Inspector and whether it has been the subject of a planning appeal for residential development. Whatever the true position, it has no real bearing on my conclusions on the key issue.

1.3.49 Taking an overall view, I conclude that both the quantity and geographical spread of ADR land set out in the BDLPPM is broadly appropriate and that there is insufficient justification for adopting a higher total or a markedly different pattern of distribution. This is the case even allowing for the uncertainties inherent in predicting requirements beyond 2011 and the need to build in a degree of flexibility.

1.3.50 Objection 1034/1386 made by the House Builders' Federation is closely linked to a parallel objection in respect of Policy DS8 considered at the RTS. Given my conclusion in respect of the total quantity of ADR land needed to 2021 or thereabouts, it follows that the requirement to review Green Belt boundaries does not apply.

1.3.51 **Issue 8:** The Government Office for the West Midlands (GOWM) is concerned that the Plan should more adequately reflect the guidance set out in PPG3, particularly in relation to the modified policies for the Green Belt boundaries and ADRs. While not objecting in principle to the ADRs, which follow the guidance in PPG2 on safeguarded land and Green Belt boundaries, GOWM maintains that the level of provision should be fully justified in the Plan in terms of future housing requirements for the District during the next Plan period. GOWM considers it necessary for the Council to demonstrate that the various studies required by PPG3 in terms of urban capacity, a systematic and sequential approach to site assessment, making the best use of land and creating sustainable residential environments have been undertaken to some degree and support ADR policy. Moreover, they contend that policies should acknowledge the new 'plan, monitor and manage' approach and indicate the way forward to implementation of that approach in the Local Plan Review.

1.3.52 The Council points out that although the BDLPPM may not make explicit reference to PPG3, this does not mean that key elements of government guidance have been ignored. As its starting point the Council took the findings of the BDLP Inspector who reported in 1997 prior to the issue of the latest PPG3. He concluded that a minimum of 15 years supply of safeguarded land was necessary to meet needs beyond the current Plan period and to avoid having to further amend Green Belt boundaries in the short term. A set of guiding principles was established. These included the need to follow cues on the location of development set by Regional Planning Guidance, to select sustainable locations and to use interim Green Belt wherever possible in preference to confirmed Green Belt. In recommending that a comprehensive ADR study be undertaken to identify 230 ha of ADR land he advised the Council to bear in mind the national strategy of giving strong preference to recycling brownfield land. Nevertheless,

the BDLP Inspector recognised the inevitability that in this District most ADRs would have to be obtained by releases from the Green Belt.

1.3.53 PPG3 (Housing – March 2000) sets out a systematic, sequential approach in identifying sites to be allocated for housing and, by extension, to selecting ADRs. First in the sequence is the re-use of previously developed land and buildings within urban areas identified by urban housing capacity studies, followed by urban extensions and, finally, new development around nodes in public transport corridors. I am satisfied that this approach has to a very large extent been mirrored in work done by the planning authorities, even though the various studies undertaken pre-dated and anticipated the subsequent advice delivered through PPG3. Such work included an urban capacity study carried out by the County Council in conjunction with the Districts and a Transport Corridors Study. The former was done in response to RPG11 as part of the WCSP preparation process. The District Council also looked at urban greenfield sites to assess their potential. Attention then turned to sites on the edge of urban areas. Only 3 non-Green Belt sites were available. Two of these were statutorily approved ADRs at Hagley (HAG1 and HAG2) and a third at Bromsgrove town (BROM5A). Finally, sites at nodes in public transport corridors were identified.

1.3.54 In the event, the Council has had to provide for less ADR land than anticipated by the BDLP Inspector as a result of Regional Planning Guidance which led to a considerable decrease in future housing levels proposed for Worcestershire and, following on from that, a reduced WCSP target for the District. I have concluded in an earlier section of this report that the 140ha (approx) of ADR land identified in the BDLPPM is sufficient to last until about 2021 or thereabouts.

1.3.55 The planning process is not a static one and the BDLP has had an extremely long gestation period. So long in fact that the Plan is now technically time-expired and work has already begun on a Local Plan Review which will have to conform to the recently adopted WCSP. It is not surprising therefore that certain elements of the Plan might be perceived as no longer fully up-to-date. These matters will need to be addressed in the Local Plan Review. Nevertheless, I am satisfied that the general thrust of the guidance given in PPG3 has been observed. Indeed, that was the general view of participants at the RTS when most aspects of ADR provision were debated at length.

1.3.56 While the amount of safeguarded land necessary to meet PPG2 advice in respect of future housing and employment provision has been based on the latest strategic information available, its life and durability will depend upon many assumptions that are prone to change - not least of which are the brownfield/windfall supply and the densities actually achieved on particular sites. In those circumstances the 'plan, monitor and manage' approach advocated in PPG3 will take on particular significance in the Local Plan Review.

1.3.57 I conclude that through its response to this objection the Council has demonstrated appropriate regard in Plan preparation to the advice in PPG3. The supporting text of the BDLPPM does not however make this clear. That text should therefore be expanded (or the information set out in a further Appendix) to justify the level of ADR provision made, to explain the general principles on which ADRs have been selected, and to clarify how PPG3 advice has been addressed in terms of urban capacity, the sequential approach to site assessment, the best use of land and achieving sustainable residential environments. The significance of the 'plan, monitor and manage' approach and its role in the subsequent Local Plan Review should be highlighted.

1.3.58 **Issue 9**: *(Land rear of 6 The Square, Alvechurch)* This site comprises a wedge-shaped parcel of land of less than 0.1ha lying within the Alvechurch Conservation Area. It is bounded to the west by a stream, to the east by the River Arrow and to the north by a close-boarded fence. The land is accessed from Radford Road via a shared driveway. At the inquiry the objector's agent clarified the extent of the site by explaining that it excludes part of the adjoining paddock to the north (within the red line on the objection plan), and also excludes land on the opposite side of the River Arrow (within the blue line).

1.3.59 The site is in a generally sustainable location close to the centre of Alvechurch and its various facilities. It contains the floor slab of a former cattery building and therefore constitutes 'brownfield' land. However, set against these advantages are the clear Green Belt purposes fulfilled by the site. It is open and well-vegetated, forming part of an area of water meadows. Together with adjoining land that also lies to the east of the stream, it assists in safeguarding the countryside from encroachment and preserves the setting and special character of the historic core of Alvechurch.

1.3.60 In ADR terms the site is so small as to offer little potential for satisfying longer-term development needs. I am in no doubt that the Council has correctly identified in the BDLPPM the most logical and defensible Green Belt boundary which exists on the ground in this area. That boundary is tightly drawn around the settlement's built fabric and follows the line of the stream running north-west to south-east along the rear of properties fronting Radford Road/The Square.

1.3.61 I conclude that the objection site should neither be designated as an ADR nor otherwise be included within the village inset, but should remain in the Green Belt. In reaching that conclusion I have not been influenced by the evidence presented regarding the planning history of the site nor its flooding potential. On neither score was that information clear and incontrovertible.

1.3.62 **Issue 10:** *(Land rear of 2 Birmingham Road, Alvechurch)* Objection 56/1406 was originally accepted by the Council as relating to Policy ALVE8 [Proposed Modification No AREA/MOD7]. However, it became clear at the inquiry that the site relates to a free-standing parcel of land at the rear of 2 Birmingham Road,

Alvechurch and does not include the adjacent cricket ground. Because it is physically divorced from ALVE8 it cannot be regarded as a possible extension of that site. I propose therefore to address it under Policy DS1, which is the alternative Policy number indicated on the objection form.

1.3.63 This vacant overgrown site of 0.4ha is sandwiched between the south-east boundary of Alvechurch and Hopwood Cricket Club ground and, in part, the long rear gardens of residential properties in Meadow Lane. It has no road frontage but is accessed through the curtilage of 2 Birmingham Road. The land adjoins the northern end of Alvechurch Conservation Area.

1.3.64 The objector argues that the site should be identified as an ADR because it is within convenient walking distance of local facilities, being closer to the village centre than ALVE6, ALVE7 and ALVE8, and inherently sustainable.

1.3.65 I am not convinced as to the suitability of this relatively small site, despite its proximity to the centre of Alvechurch. There is no evidence that it constitutes 'brownfield' land. Not only does it have unsatisfactory access taken through the grounds of a veterinary hospital and classic car garage, but it would cause development to project outwards into the Green Belt and encroach on the countryside. Development here would be clearly visible from the public footpath to the east and would in my opinion adversely affect both the rural setting of Alvechurch and the adjoining Conservation Area. Given that there is no pressing need to find additional safeguarded land in Alvechurch I see no argument in favour of ADR designation and inclusion in the village inset. I am satisfied that the BDLPPM has defined the most readily recognisable and defensible Green Belt boundary in this location, running along the rear boundaries of properties in Birmingham Road and Meadow Lane.

1.3.66 **Issue 11:** *(Land at Halesowen Road, Lydiate Ash)* The objector argues that the quantity of safeguarded land identified by the Council is insufficient to meet the recommendations of the BDLP Inspector and that some is inappropriate for future development. A site at Halesowen Road, Lydiate Ash is promoted as an ADR

1.3.67 I have already dealt with the first 2 elements of this objection both in the paragraphs set out above and in my assessment of issues raised at the RTS. By way of summary, I conclude that the 140ha (approx) identified in the BDLPPM is sufficient to meet requirements until 2021 or thereabouts. I support the general distribution of ADR land proposed by the Council.

1.3.68 The objection site is located to the south of Junction 4 of the M5 motorway. It comprises the extensive curtilage of 'The Limes', 31 Halesowen Road, Lydiate Ash and adjoining fields that stretch as far as the M5 to the west. The land lies outside any rail-based Transport Corridor, being beyond the 5 minute drive isochrone of a railway station. Given its proximity to a major motorway junction, development of the site would be likely to encourage greater car use, contrary to

the advice in PPG3 (Housing) and PPG13 (Transport). The objection site does not adjoin an urban area but is located within a straggle of development along the A38 to the north of Catshill/Marlbrook. It is some distance from local facilities. Consequently, I do not consider the site to be in a generally sustainable location in terms of public transport opportunities, employment or services.

1.3.69 Turning to the Green Belt implications, the site lies within a semi-rural area where the Green Belt has already been confirmed. In such locations it is necessary, by virtue of PPG2, to find 'exceptional circumstances' that justify amending those boundaries. In this case the objection site falls within the vulnerable, relatively narrow gap between Catshill to the south and the Birmingham conurbation to the north. The land is visible from roads to the east and west and from the footpath adjoining the southern boundary. I consider that development of this site would seriously encroach into the surrounding open countryside. Moreover, by promoting piecemeal development it would represent a further incremental step in a process of coalescence. Preventing neighbouring towns from merging into one another and assisting in safeguarding the surrounding countryside from encroachment are both important Green Belt purposes fulfilled by the land.

1.3.70 The site is of Grade 2 agricultural land quality which is some of the best and most versatile farming land. Applying the 'worst first' axiom, based on the advice in PPG7 (The Countryside - Environmental Quality and Economic and Social Development), makes the objection site even less appropriate as an ADR. Finally, I have some reservations concerning potential traffic noise nuisance from the M5. A section of the site might prove unsuitable for housing development, bearing in mind the advice in PPG24 (Noise). No information has been provided to enable me to come to a firm conclusion on this matter but it is, I feel, unlikely to preclude development of at least part of the land.

1.3.71 By way of summary, I consider the objection site to be in an unsustainable location outside the main urban areas of the District and beyond a rail corridor. The land fulfils important Green Belt functions and is subject to some environmental constraints. It would therefore be inappropriate as an ADR.

1.3.72 **Issue 12:** *(The Fordrough, Wythall)* The objection site is located on the west side of The Fordrough on the north-east perimeter of Wythall, just beyond the settlement boundary indicated on the BDLPPM Proposals Map. The land extends to 1.6ha and shares a western boundary with the Gay Hill Golf Course. It includes the extensive curtilages of a number of detached dwellings, together with a non-conforming commercial use (roofing merchant and contractor's business). The Council accepts that it is a brownfield site.

1.3.73 The objector seeks exclusion of the land from the Green Belt and its designation either as a housing site or ADR. In terms of both Green Belt purposes and sustainability it is argued that the site performs significantly better than the larger Council-promoted sites on the north and west sides of Bromsgrove town and, in

some respects, better than WYT14 and WYT15. The land was not included within the 80 sites assessed by the Council in its ADR review. That study was not made subject to public consultation and no substantive justification has been given for the choice of sites. Had The Fordrough been examined, the objector maintains that it would have attracted a very low score indeed, out-performing most others, some of which rely on an unrealistic 5 minute drive isochrone defined for Bromsgrove railway station.

1.3.74 Looking first at the proposed housing allocation, the point is made that this would give an area for limited growth in Wythall, as provided for in Policy DS4. However, I am satisfied that there is no need for further housing provision at Wythall within the Plan period. The BDLP is already time-expired and, according to the latest Housing Land Availability figures, there is a housing land supply sufficient to last for quite a few years into the future.

1.3.75 Turning now to the ADR proposal, I accept that the site is a sustainable option. The land is a brownfield site on the urban edge where PPG3 would support a more efficient use of land. It is situated within reasonable distance of village facilities and Wythall railway station, is well screened and has a defensible road boundary to the east. Moreover, no access constraints have been brought to my attention, despite the Fordrough being rather long, narrow and lacking in footways. However, I cannot agree that the land does not fulfil vital Green Belt purposes. I believe that its openness assists in safeguarding the countryside from further encroachment and helps to prevent neighbouring towns from merging into one another. The erection of 35-40 dwellings in this location would, I feel, seriously impinge upon the very narrow gap that separates Wythall from the southern limits of the Birmingham conurbation and contribute towards coalescence at a vulnerable and sensitive location. To my mind the village envelope and Green Belt boundaries have been sensibly drawn, following the much more intensive suburban development bordering the north side of Windrush Road but excluding the ribbon development on the objection site. I do not regard this as an anomaly. Quite the contrary; that is the general pattern I perceive to have been followed by the Council throughout the District. The Green Belt boundaries have already been confirmed here. Consequently, to comply with the advice in PPG2 it is necessary to identify 'exceptional circumstances' that would warrant altering those boundaries. In this instance, the benefits of developing a sustainable brownfield site where a non-conforming use has the potential to cause nuisance are, I believe, comprehensively outweighed by the important Green Belt functions performed by the land.

1.3.76 As regards the ADRs proposed on the north and west sides of Bromsgrove, I do not feel that a direct comparison is valid. Those sites are very much more extensive in area. They reflect the strategic imperative recognised both by the BDLP Inspector and the WCSP EiP Panel of seeking to locate the majority of development growth in or adjacent to Bromsgrove town. I consider the relative

merits of WYT14 and WYT15 later in my report when I examine them in relation to other objections.

1.3.77 Finally on this issue, the objector is concerned regarding the last sentence of Policy DS8 which reads: "In any event, planning permission for the permanent development of Areas of Development Restraint will only be granted following a local plan review which proposes the development of a particular Area of Development Restraint." It is argued that this statement will bring uncertainty for landowners, and suggests that ADR designation and even exclusion from the Green Belt could be reversed in the Local Plan Review. I note, however, that this modification has been made by the Council in direct response to the recommendation of the BDLP Inspector who thought it necessary to strengthen the Policy to more accurately reflect the advice in Annex B of PPG2. I see no difficulty with this wording. Circumstances can and do change over time - particularly when a time horizon of 2021 is being recommended. Decisions as to when, or even whether, to bring forward individual ADRs are clearly matters to be addressed in the next Plan, and possibly the one beyond that, to ensure an adequate and controlled supply of development land for the District.

1.3.78 **Issue 13:** *(Park Hall, Grafton Lane, Bromsgrove)* The objection site consists of the large curtilage (0.75ha) of a detached house located on the west side of the A38 Worcester Road, adjoining the south-west limits of Bromsgrove town. The land falls within interim Green Belt where Green Belt boundaries remain to be defined in this Local Plan.

1.3.79 The eastern side of Worcester Road is characterised by extensive housing development that has taken place in the 1970s and 1980s. In marked contrast, land to the west of the road at this point has little development in place, comprising a loose scattering of properties set in open countryside, with the A38 forming a clear boundary between the 2 areas. The objection site fulfils the Green Belt purpose of safeguarding the countryside from encroachment. In my opinion, the curtilage of Park Hall is appropriately included within the Green Belt and excluded from the settlement limits of Bromsgrove town. To my mind the advantages of a sustainable brownfield location close to urban facilities and within the 5 minute drive isochrone of Bromsgrove railway station do not, when weighed against the Green Belt function of the land, justify residential development. The erection of some 23 dwellings here would significantly intrude into the attractive rural landscape, harming the character of the area and setting a precedent for further piecemeal incursions into the Green Belt.

1.3.80 I note that a site only 100m or so to the south of the current objection site was considered by the BDLP Inspector. Although that land had not previously been developed his conclusions are apposite. He regarded Worcester Road, as I do, as a significant demarcation line between the main built-up area of the town and the open countryside and recommended that the site be kept permanently open by means of Green Belt designation. Those conclusions support my findings.

1.3.81 **Issue 14:** In response to objections 1247/1441 and 1251/1444 the Council has set out the guidance contained in both PPG2 (Green Belts) and RPG11 (Regional Planning Guidance for the West Midlands Region) in respect of safeguarded land. There then follows a detailed account of the history of the District's Local Plan preparation process from the point of view of ADR provision. This reveals that 73% of the ADRs promoted by the Council lie outside the confirmed Green Belt. The majority, mostly around Bromsgrove town, are within interim Green Belt although 3 sites - at Perryfields Road East (BROM5A), the sewage treatment works, Hagley (HAG1) and land off Kidderminster Road South and Western Road, Hagley (HAG2) - fall outside the Green Belt altogether.

1.3.82 ADRs were selected by the Council following the advice of the BDLP Inspector. He indicated that: "Within Bromsgrove District these concerns for 'sustainability' would in my opinion point towards consideration of ADRs, firstly, at or adjacent to Bromsgrove town, and, secondly, at locations which are close to both local facilities and rail links to the conurbation, such as Hagley, Alvechurch, Barnt Green and Wythall."

1.3.83 Alvechurch is a large village within a recognised rail Transport Corridor and possesses a range of local services. On the advice of the BDLP Inspector it is proposed that the village be inset from the Green Belt. To that end, a tight boundary has been drawn around the settlement, following the village envelope originally defined on the Deposit Draft Proposals Map. The ADR land identified by the Council on the northern outskirts of Alvechurch (ALVE6, AVE7 and ALVE8), is relatively modest. Even allowing for the additional provision I recommend at the former Brickworks site to the west, it remains broadly proportional to the size of the settlement and to its potential to accommodate sustainable development without serious loss of character. It is clearly very important to maintain the major Green Belt gaps between Bromsgrove and Birmingham and between Redditch and Birmingham. The safeguarded land proposed at Alvechurch would not in my view compromise that position but would secure defensible Green Belt boundaries likely to endure to 2021 or beyond. I conclude that there are no compelling reasons to further modify the ADR provision at Alvechurch.

1.3.84 **Issue 15:** *(Bromsgrove Cricket, Hockey and Tennis Club, Bromsgrove)* The objection site lies on the south-eastern side of Bromsgrove town and comprises a sports ground catering for a variety of, mostly outdoor, activities. Access is obtained from St Godwald's Road. The north-western boundary is formed by the BROM5C ADR proposed by the Council which, in turn, adjoins an area of recent residential development on the site of the former Wagon Works adjacent to the railway line. While most of the site is open land, the Club has a range of facilities including a club house with bar and a second pitch pavilion.

1.3.85 The Club wishes to relocate to an alternative location to fund enhanced facilities, such as an all-weather hockey pitch. It is seeking exclusion of the objection site from the Green Belt in order that the land be used for housing either in the short or medium term or be designated as an ADR in conjunction with BROM5C.

1.3.86 Looking first at the short-to-medium term, I accept that this is a generally sustainable location. It is close to public transport facilities, particularly Bromsgrove railway station, shops and employment. However, there is no specific housing requirement under BDLPPM Policy DS3. And as regards the next Plan period, Table 8 of the Council's Background Paper 4 (Housing) demonstrates that at October 2000 there was an 8.2 years housing land supply, thereby satisfying needs over the medium term.

1.3.87 Turning now to the ADR proposal, the Council's Background Paper 2 reveals that the objection site was assessed as part of a more extensive tract of land (9A Upper Gambolds), which also included BROM5C. Although Site 9A scored relatively well in the study matrix, I can appreciate the Council's desire to minimise incursions into the confirmed Green Belt and, for landscape reasons, to limit future development beyond the railway line to the south-east of Bromsgrove. I support that general approach. I have already concluded elsewhere in this report that there is no need to identify more than the 140ha or so of safeguarded land proposed by the Council. Such a level of provision should be sufficient to last until 2021 or thereabouts.

1.3.88 As regards a relocation of the Club, I can see no benefit other than a purely financial one and no Green Belt advantage. Bromsgrove town is surrounded on all sides by Green Belt making it almost inevitable that any relocation would be subject to similar policy constraints on the facilities provided.

1.3.89 The ADR promoted by the Council at BROM5C is admittedly of an irregular shape with a particularly narrow central section. However, I do not see this as a serious problem bearing in mind the physical relationship of the land with adjacent housing and its road infrastructure, and the site frontage available to St Godwald's Road. BROM 5C would not, in my opinion, be incapable of satisfactory development in isolation. It has a reasonably strong and defensible south-eastern boundary in the form of a tree-lined hedgerow. This is reinforced over part of its length by a marked change in ground levels, separating the site from the adjacent Club. There is therefore no compelling argument for extending BROM5C south-eastwards to Lower Gambolds Lane. To do so would lead to further loss of confirmed Green Belt. This would conflict with one its main purposes which is to safeguard the countryside from encroachment. Development here would also be prominent in views from higher ground to the east and south that forms part of the Landscape Protection Area.

1.3.90 The objector's concern regarding the final sentence of Policy DS8 has already been addressed in response to other objections (see Paragraph 1.3.77).

Recommendations

1.3.91 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD5, subject to the following additional modifications:

Issue 2:

(v) the former Brickworks site, Scarfield Road, Alvechurch be designated as an ADR.

(vi) the Green Belt boundary be redrawn in accordance with Plan 1 of the Appendices to the Chapman Warren proof O/DS1-DS/MOD5/60/1018/ACB/1-APP, subject to the omission of land west of the canal and south of the Brickworks.

(vii) a new strategic open space protection policy be applied to the field east of the canal and west of the railway line.

(viii) the Proposals Map and Appendix 3A be modified accordingly.

Issue 8:

The explanatory text at Paragraph 8.19 be expanded (or a further Appendix introduced):

(i) to justify the level of ADR provision made.

(iv) to explain the general principles on which ADRs have been selected.

(v) to clarify how PPG3 advice has been addressed in terms of:

- **e) urban capacity**
- **f) the sequential approach to site assessment**
- **g) the best use of land**
- **h) achieving sustainable residential environments**
- **e) the role of the 'plan, monitor and manage' approach**

(b) That no further modifications be made to the Plan in respect of these objections *(Issues 1, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14 and 15).*

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1.4 Policy DS4 – Other Locations for Growth [Proposed Modification No DS/MOD8]

61/1019 Mr & Mrs Rachman

Key Issue

1.4.1 Whether it is appropriate to inset Alvechurch from the Green Belt.

Inspector's Appraisal and Conclusions

1.4.2 The objectors contend that Alvechurch should not be taken out of the Green Belt. To do so would, they say, change its village character and could eventually lead to urban sprawl causing the settlement to be absorbed into the Birmingham conurbation or be combined with Redditch.

1.4.3 The broader question was considered by the BDLP Inspector. He pointed out that Alvechurch is a very substantial village with a population of around 3,300 and a good range of services, and is within a transport corridor. He recognised the vulnerability of Alvechurch's position, sandwiched between large urban areas in a relatively narrow gap subject to development pressures. But he did not believe that creating a village inset makes the Green Belt areas outside it any more likely to suffer from inappropriate development. I concur with that view. The BDLP Inspector concluded that Alvechurch should be inset from the Green Belt and the Council has accepted that recommendation.

1.4.4 Policy DS4 of the BDLPPM lists a number of settlements excluded from the Green Belt, including Alvechurch. Paragraph 8.11 of the supporting text explains that although there are few specific land use allocations made for these areas, it is possible that limited development could occur. The example is given of infill sites where small groups of housing could prove acceptable, subject to compliance with other Plan policies. This is a fairly restrictive policy which would not, in my view, be likely to result in significant change to the character of the village. In these circumstances I support the Proposed Modification.

Recommendations

1.4.6 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD8.

(b) That no further modifications be made to the Plan in respect of this objection.

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1.5 Policy DS5 – Village Envelope Settlements [Proposed Modification No DS/MOD9]

265/1110 Clent Parish Council
399/1157 P W King

Key Issues

1.5.1 (1) Whether Clent should be included within the scope of Policy DS5 and, if so, whether 4 village envelopes are appropriate.

(2) Whether village envelopes have been defined too narrowly.

Inspector's Appraisal and Conclusions

1.5.2 **Issue 1:** The District strategy is to direct the bulk of new development firstly to Bromsgrove, in accordance with BDLPPM Policy DS3, and secondly to the larger settlements excluded from the Green Belt referred to in Policy DS4. A third tier comprises the Policy DS5 Village Envelope Settlements where HWCSP limited housing infill policy H17(d) applies.

1.5.3 Policy DS5 has to be read in conjunction with Policy S9 (New Dwellings in the Green Belt). This sets out the circumstances in which new residential development in the Green Belt will be acceptable. Those categories include "d) it is limited infill within the present boundary of the settlements where a 'village envelope' has been defined (see Appendix 3)."

1.5.4 Clent Parish Council is concerned that with 4 village envelopes drawn for various parts of Clent, out of a District total of 13, it has been given a disproportionate number. It is argued that they encourage development in conflict with Green Belt, conservation area and landscape protection objectives.

1.5.5 The District Council has explained the background to Policies DS5 and S9. In brief, they follow PPG2 (Green Belts) advice on how to treat existing villages in Green Belt areas. Clent and the other DS5 villages have been 'washed over' by the Green Belt rather than 'inset' (ie excluded) and a policy has been introduced in respect of infilling within the defined settlement boundaries. Village envelopes have been drawn to avoid disputes over whether particular sites are covered by the infill policy.

1.5.6 Adams Hill, Clent, Holy Cross and Lower Clent are situated fairly close to each other, are of a reasonable size and are similar in nature. They possess a modest range of services and facilities, making them sustainable locations in which to accommodate a limited amount of development. Some degree of consolidation of their fabric would not, in my view, harm the essential character of these settlements. It would give support to their social and economic base, allowing

them to evolve and avoid stagnation while protecting the open countryside beyond. With that in mind I believe that village enveloping is the most appropriate course of action. If there was no settlement boundary drawn, those seeking to develop land would be afforded little guidance and the opportunity would be lost for the District Council to direct infilling to the most appropriate locations.

1.5.7 The village envelopes that have been defined reflect the historic core of each settlement. Peripheral buildings divorced from those centres and the open areas in between have generally been excluded in order to restrict the potential for infill development. As the District Council points out, the alternative would be to draw a single all-embracing settlement boundary. I agree that given the poly-nuclear character of Clent that would give scope for much greater levels of development, far more likely to harm its historic form.

1.5.8 Much of Clent lies within a Landscape Protection Area, designated in recognition of the attractive nature of the Clent Hills which are used extensively for recreational purposes. Parts also fall within a Conservation Area. Policies DS5 and S9 apply equally to those areas as to other locations outside. But the Plan has to be applied as a whole and, in addition, any development would have to comply with other relevant BDLPPM policies - including Policies S35A (Development in Conservation Areas) and C4 (Criteria for Assessing Development Proposals). I therefore see no policy conflict or encouragement of inappropriate development through village enveloping.

1.5.9 The Parish Council is critical of the way in which a particular planning application was handled by Planning Officers (Ref: B/2000/0526 – land adjacent to The Cottage, Adams Hill). It is claimed that the village envelope criterion was applied before Green Belt, conservation area and landscape protection policies and given greater weight. The application was refused against officer advice, and subsequently dismissed on appeal. However, the Committee Report confirms that all relevant planning policy advice was taken into consideration. As the District Council points out, development control decisions by their very nature involve an element of subjective judgement.

1.5.10 In summary, I am satisfied that Clent should be included within the list of villages subject to Policy DS5, and that the 4 village envelopes drawn are appropriate. This approach properly reflects the potential of the settlement to accommodate limited infilling and accords with both PPG2 and Structure Plan guidance. There is no incompatibility with other Plan policies.

1.5.11 **Issue 2:** The objector considers that the boundaries of several village envelopes have been drawn in too sinuous and tight a manner. Instead, they should be re-drafted to reflect existing property lines. It is argued that rather than being controlled by Green Belt policy, rear gardens should be subject of specific policies to limit or preclude their development.

1.5.12 In defining envelopes for those settlements listed in BDLPPM Policy DS5 the Council has explained that it generally adopted the core of each village and drew the boundaries quite tightly, tracing the full curtilages of properties wherever possible. In a few cases, however, the village boundary was cut back so as to avoid the potential for further development - particularly where a concentration of buildings on the edge of the settlement could harm its character. Fringe buildings, groups of buildings distinctly separate from the village proper, outlying parts of settlements and subsidiary settlement forms were all excluded. The intention has clearly been to minimise the scope for infilling to accord with the limitations imposed by HWCSP Policy 17(d), which are reflected in BDLPPM Policy S9. Policy DS5 goes on to define 'limited infill', and precludes certain specified inappropriate forms of development.

1.5.13 The Council's approach seems to me to be an eminently reasonable one. I can see no logical argument for every village envelope having a smooth convex boundary nor for all large curtilages to be incorporated. The settlements listed in Policy DS5 are within the Green Belt and washed over by it. There would therefore be none of the 'salients of pure Green Belt intruding between different parts of a village envelope' that are referred to by the objector. Boundaries that have been drawn are in some cases, like Clent, quite irregular. But that is of no consequence in itself. What matters is not the shape and form of the resulting envelope but its ability, supported by an adequate policy base, to capitalise on the limited remaining potential of designated settlements while preventing the worst excesses of development. With the village envelopes as defined, and supported by Policies DS5 and S9, I find that there is no need for a specific policy prohibiting development in back gardens.

Recommendations

1.5.14 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD9.

(b) That no further modifications be made to the Plan in respect of these objections.

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1.6 Policy DS8 – Areas of Development Restraint [Proposed Modification No DS/MOD12]

4/1002 The Hagley Estate
6/1002 The Hagley Estate

246/1002	The Hagley Estate
253/1002	The Hagley Estate
578/1002	The Hagley Estate
72/1004	Alvechurch Parish Council
98/1006	David Wilson Estates
68/1014	Redrow Homes (Midlands) Ltd
62/1019	Mr & Mrs Rachman
71/1021	J A Byrne
97/1030	G G Vale
1258/1053	Mr J M Pashley
149/1067	J D O'Reilly
161/1071	Fairclough Homes Ltd
162/1072	Mr J T Hill
1241/1072	Mr J T Hill
166/1074	The Bromsgrove Society
300/1075	Crest Nicholson Residential (Midlands) Ltd
259/1108	Mr P Holliday
572/1242	Hillsdown Holdings Ltd
574/1244	J J Gallagher Ltd
966/1381	Billingham & Kite Ltd
1262/1382	Bryant Group
1211/1385	Stansgate Planning Consultants
1036/1386	House Builders' Federation
1037/1387	Bellway Estates
1044/1388	David Wilson Estates
1273/1388	David Wilson Estates
1202/1402	Government Office for the West Midlands
1242/1405	Wimpey Homes Holdings Ltd
169/1410	T H Griffin
262/1411	Mrs M Gwynne
933/1414	Messrs Pugh, McKernan, Archer & Moore
1019/1420	Land & Leisure Ltd
1020/1421	Mr & Mrs G Riley
1025/1422	Priory Building Management Ltd
1021/1425	Fennbend Ltd
1022/1426	Mrs E Hubbard
1023/1427	Mrs S Grant Nicholas
1024/1428	A E Beckett & Sons Ltd
1052/1429	Westbury Homes (Holdings) Ltd
1064/1430	Persimmon Homes
1076/1432	Bovis Homes Ltd
1086/1433	Barratt West Midlands
1278/1453	Bromsgrove Cricket, Hockey & Tennis Club

(NB. Some of these objections are also addressed under Section 1.2 of the report which deals with matters discussed at the Round Table Session)

Key Issues

1.6.1 (1) Whether (a) land south of Kidderminster Road, Hagley and (b) land off Brake Lane, Hagley should be designated as ADRs and excluded from the Green Belt. *[The Hagley Estate]*

(2) Whether it is made sufficiently clear in Policy DS8 that ADRs comprise land within the settlement boundary that is excluded from the Green Belt.

(3) Whether the Alvechurch Brickworks site should be identified as an ADR and developed before ALVE6, ALVE7 and ALVE8.

(4) Whether the supporting text to Policy DS8 should (a) refer to the timescale over which it is anticipated the Green Belt boundary will endure, and (b) confirm that ADRs represent sustainable locations for development.

(5) Whether ADRs should be prioritised according to their degree of sustainability.

(6) Whether land to the south of Station Road, Alvechurch should be excluded from the Green Belt and identified as an ADR, either by way of addition to or replacement of ALVE6, ALVE7 and ALVE8.

(7) Whether the ADR provision proposed for Alvechurch would be likely to put local facilities under pressure or at risk.

(8) Whether land at Mill Farm, Radford Road, Alvechurch should be included within the settlement boundary, excluded from the Green Belt and identified as an ADR.

(9) Whether land at Hazy Hill Farm, 248A Old Birmingham Road, Lickey should be excluded from the Green Belt and identified as an ADR.

(10) Whether the Council has undertaken a proper scrutiny of ADRs, taking into account local factors and concerns of the community.

(11) Whether land at Little Heath Lane, Lickey End should be identified as an ADR.

(12) Whether land between residential properties fronting Birmingham Road/Braces Lane/Redland Close, Marlbrook should be designated as an ADR.

(13) Whether land off Brake Lane, Hagley should be identified as an ADR and excluded from the Green Belt *[Crest Nicholson Residential (Midlands) Ltd]*.

(14) Whether land at Old Birmingham Road, Lydiate Ash should be identified as an ADR and taken out of the Green Belt.

(15) Whether land at Dovehouse Fields Farm, Hunnington should be identified as an ADR.

(16) Whether land at Bleakhouse Farm, Wythall should be designated as an ADR.

(17) Whether sufficient ADR land has been identified in appropriate locations.

(18) Whether land at Ryefields Farm, Stoke Prior should be identified as an ADR and excluded from the Green Belt.

(19) Whether reference should be made in the explanatory text to the prioritisation of ADRs adjacent to Bromsgrove town.

(20) Whether the Proposed Modifications adequately reflect national planning policy guidance set out in PPG3 (Housing).

(21) Whether land at the M5/M42 junction on the north side of BROM5B should be identified as an ADR.

(22) Whether land at Halesowen Road, Lydiate Ash should be identified as an ADR and excluded from the Green Belt.

(23) Whether land at the Fordrough, Wythall should be excluded from the Green Belt and indicated within the Wythall Inset as either (a) a location for residential development, or (b) as an ADR.

(24) Whether land at Church Road, Catshill should be designated as an ADR and the Green Belt boundary modified to run along the M5 motorway at this point.

(25) Whether land at Rocky Lane, Catshill should be designated as an ADR.

(26) Whether land adjoining the former Recovery Hospital, Blackwell should be identified as an ADR, and the Green Belt boundary further modified.

(27) Whether land at Westfields, Catshill should be identified as an ADR and the Green Belt boundary further modified.

(28) Whether land at Kendal End Road, Barnt Green should be identified as an ADR and excluded from the Green Belt.

(29) Whether land at Heath Farm, Wythall should be identified as either (a) an ADR, or (b) a Major Developed Site in the Green Belt.

(30) Whether land at Bromsgrove Cricket, Hockey and Tennis Club should be excluded from the Green Belt and identified either as (a) a location for residential development, or (b) an ADR.

Inspector's Appraisal and Conclusions

1.6.2 **General:** I have already found, after consideration of matters debated at the RTS, that the quantity of ADR land provided for in the BDLPPM will be sufficient to meet the needs of the District for safeguarded land well beyond the Plan period. This should ensure that the new Green Belt boundaries will endure. I also support in very general terms the broad distribution of safeguarded land promoted by the Council. It is against this background that all objections to Policy DS8 are reviewed.

1.6.3 **Issue 1:** *(Land south of Kidderminster Road, Hagley and land off Brake Lane, Hagley)* Before considering the individual merits of these ADR omission sites I shall examine the broader role of Hagley in terms of its potential to meet the longer-term needs of the District for housing and employment land.

1.6.4 WCSP Policy SD.6 states that the majority of the outstanding needs of the County to be met within the Structure Plan period will take place within or adjacent to the principal urban areas within the Central Crescent. In terms of Bromsgrove District this means, essentially, Bromsgrove town. Elsewhere in the Central Crescent development would be appropriate at other urban settlements if the criteria in Policies SD.4 (Minimising the Need to Travel) and SD.5 (Achieving Balanced Communities) can be satisfied. Such a Policy continues the primacy given to Bromsgrove town in the previous HWCSP and reflected in BDLPPM Policy DS3. Hagley has no special status relative to other secondary settlements. I note that the reference in Policy D1 of the Deposit Draft WCSP to most growth being centred on Bromsgrove and Hagley was subsequently changed in the adopted version. The EiP Panel Report found that the urban areas named in Policy D1 were too restrictive and that there were other settlements within the Central Crescent that were sustainable locations on transport corridors which could potentially take some development in accordance with the sequential approach. The BDLP Inspector had, somewhat earlier, reached a similar view. His report indicated that: "Within Bromsgrove District these concerns for 'sustainability' would in my opinion point towards consideration of ADRs, firstly, at or adjacent to Bromsgrove town, and, secondly, at locations which are close to both local facilities and rail links to the conurbation, such as Hagley, Alvechurch, Barnt Green and Wythall."

1.6.5 The BDLPPM makes some provision for ADRs at Hagley, recognising its sustainability. Two ADRs have been carried forwards from the Hagley/Clent

Local Plan (HAG1 - 2.9ha and HAG2 - 10.5ha) and a further modest extension is proposed through the BDLPPM (HAG2A - 1.6ha). Together these ADRs would provide 15ha or 10.6% of the District's total which, as the Council points out, is broadly proportional to the size of the settlement.

1.6.6 I accept that there is no overriding policy imperative to find additional safeguarded land in Hagley where provision for ADRs is already greater than that made for any other settlement in the District, outside Bromsgrove town. However, Hagley does possess, in my opinion, certain advantages relative to the other secondary settlements. Firstly, it is one of the larger urban areas in the District. The 2 original nuclei of Hagley and West Hagley have effectively combined with more recent housing linking the core areas of each settlement. It now has 10.3% of the population of the 5 settlements located on transport corridors.

1.6.7 Next, Hagley is situated very close to the conurbation within the Birmingham-Colwall rail corridor where there is a minimum of one train each hour throughout the day, and 5 trains per hour in both morning and evening peaks. This rail corridor is notable by virtue of its spare capacity. Indeed, even at peak times trains are only 82% loaded at New Street in the morning and 74% in the evening. It is the first stop on the line out of the conurbation, making it well-placed to accommodate migrant households from Birmingham and affording them an opportunity to commute short distances to work by public transport. The significance of this factor might reduce over time, but it has to be noted that the emerging RPG is still at a relatively early stage. As regards bus transport, Hagley is situated at the junction of the A456 and A491 trunk roads. During peak periods there is a half hourly service to Bromsgrove and Stourbridge and an hourly service to Birmingham and Kidderminster. The clear advice in PPG3 and PPG13 is that after urban intensification, development should look to urban extensions in public transport corridors that have the ability to reduce the need for, dependency on, and distance travelled by the private car. Hagley is poised to do just this.

1.6.8 Thirdly, Hagley has a well-defined tight-knit centre along Worcester Road offering a variety of services and facilities. They include a supermarket, a range of convenience and specialist retail outlets, a post office, banks, health facilities, day centre, library, hairdressers, restaurants, hot food takeaways, recreation ground and schools ranging from nursery to secondary. The village centre is far more highly developed than, for example, Wythall which has no clear focus. It also has some local employment at Hagley Hall Mews.

1.6.9 All of these factors point, in my view, to a rather more generous provision of safeguarded land here at Hagley than at the other secondary settlements. Commenting on its suitability the BDLP Inspector remarked: "…it appears that Hagley has distinct advantages as a possible location for some future development. It is of sufficient size to have a reasonable range of local facilities, and has good transport links, including by rail. I conclude therefore that, given

the need, there are, in principle exceptional circumstances which could justify ADR provision at Hagley. That is subject to site specific matters, especially impact on the effectiveness of the Green Belt. It must also be borne in mind that there is already some ADR provision here."

1.6.10 I shall, however, assess each of these Hagley objection sites on their own merits, bearing in mind also the criticisms that have been levelled by the objector in respect of the Council-promoted sites in Bromsgrove (BROM5, BROM5B and BROM5D), and at Barnt Green and Alvechurch.

1.6.11 Looking first at land south of Kidderminster Road, this 10.5ha site is located in confirmed Green Belt on the eastern side of West Hagley, bounded by the A456 to the north, the A491 to the east, the HAG2 ADR to the west and Gallows Brook to the south. The land slopes upwards from south-west to north-east and comprises best and most versatile agricultural land (Grade 1 on the periphery with Grade 3a in the centre). It has, in PPG2 terms, relatively strong defensible boundaries and, subject to implementation of HAG2, would be flanked on 2 sides by urban development. Its use as an ADR would, in my view, serve to round off Hagley village, reducing its current elongated form.

1.6.12 Given that the land is not contiguous with the West Midlands conurbation, release of this site as an ADR would not compromise the Green Belt function of checking the unrestricted sprawl of large urban areas. Moreover, there are no other settlements close to Hagley that would cause neighbouring towns to merge. The only Green Belt purpose of direct relevance is, I believe, to assist in safeguarding the countryside from encroachment. However, the Council concedes that virtually all ADRs conflict with this function. In my opinion, the degree of encroachment here would not be so severe as to prove unacceptable. Nor does the fact that this is confirmed Green Belt represent, by itself, a compelling indictment for reasons that I have already examined.

1.6.13 Moving on to considerations of sustainability, the site is conveniently situated within easy walking distance of the settlement's main services - shops, schools, recreational facilities and railway station. In this respect it performs better than, for example, sites BROM5, BROM5B and BROM5D. These are some distance both from Bromsgrove railway station, which is on a section of the rail network that is operating at capacity with no short term prospects of improvement, and Bromsgrove town centre, thereby placing greater reliance on bus services or car journeys. Moreover, because the objection site adjoins HAG2 it provides an opportunity for their development to be planned and phased comprehensively and for some employment to be introduced. This would help to address the imbalance between houses and jobs in Hagley - thereby enhancing the village's overall sustainability.

1.6.14 The objection site is of high agricultural land quality. But this is true of much of the District and applies to the great majority of the greenfield land around

Bromsgrove and many of the other sustainable settlements. With a reducing amount of brownfield land available, the loss of some best and most versatile agricultural land in the future is unavoidable.

1.6.15 As regards the potential landscape impact, the character of Hagley is determined to a large extent by topography. It lies in a shallow, broad bowl formed by 4 valleys that coincide at Sweet Pool with higher ground and ridge lines to the west, north-west, north-east, east and south. These combine with extensive blocks of woodland to limit inter-visibility with the surrounding countryside. In the context of these elevated panoramas, I concur with the objector that the settlement appears rather diminutive such that further development south of Kidderminster Road would have a relatively limited visual impact on its wider setting.

1.6.16 The objection site was considered by the BDLP Inspector as part of a more extensive ADR proposal. He said: "Site A is divided roughly in two by the Gallows Brook which crosses it from north-east to south-west. The half of the site north of the brook is well related to the existing built-up area of Hagley, and is bounded on two sides by main roads, and on another side by the edge of the existing ADR (HAG2). As the previous Local Plan Inspector observed, the north-east corner of the site is visible from the high land to the east of Hagley. I accept therefore that the portion of the site nearest the roundabout on the A491 should perhaps not be developed for housing in any event. Subject to that, the remainder of this northern half of Site A would be, in terms of visual impact, an acceptable location for future development should the need arise." I agree with those sentiments. I do not accept the Council's contention that development would be unduly prominent when viewed from the Clent Hills and from the south along the A491. But equally, I consider the elevated corner of the site to be unsuitable for any form of built development - whether housing or employment. This is in spite of the success of the structural planting that is now well established alongside the roundabout. While landscape treatment and use of that area would be a matter for detailed consideration as part of a development brief, it need not be such a constraint as to preclude designation of the land as an ADR.

1.6.17 I turn now to the site off Brake Lane. This too is confirmed Green Belt and comprises 3 fields of Grades 2 and 3b agricultural land quality adjoining the built-up area of Hagley on its western side. The site is approximately 13.1ha and extends from Brake Lane in the north to the railway line, in cutting, to the south. It occupies the eastern side of a small dry valley which falls in height from north-north-east to south-south-west. Further to the west is open countryside rising to the wooded hills of Brakemill Plantation/Palmer's Hill.

1.6.18 Like the land south of Kidderminster Road, this objection site fulfils no Green Belt purpose in respect of checking the unrestricted sprawl of large urban areas or preventing neighbouring towns from merging into one another. Its main function is to assist in safeguarding the countryside from encroachment. But whereas the other site has strong defensible boundaries, this site's western boundary is very

poorly defined, following the valley bottom and short sections of hedgerow. The BDLP Inspector considered this site. He said: "I agree that the countryside to the west of Hagley is attractive. It is my impression, however, that any intrusion would be noticeable, mainly from fairly close to the site, for example, from the public right of way a little to the west. The impact over a wider area would be limited."

1.6.19 That is not the way I assess the position. Although longer-range views of the site from the west would be curtailed by the steep ridge of Brakemill Plantation and Palmer's Hill, the setting of Hagley would, I feel, be seriously harmed when seen from either of the 2 parallel footpaths to the west. Moreover, the settlement's urban form would be further stretched. To my mind the lack of an obvious and defensible western boundary would create pressure for extending development for as far as the topography would reasonably allow. This would lead to at least a doubling of the site area at the expense of this very attractive landscape. I consider that such encroachment into the surrounding countryside would be quite unacceptable.

1.6.20 From a sustainability perspective, there are arguments in favour of this site. It is relatively close to the shopping centre of Hagley focused on Worcester Road, to existing schools (Haybridge and Hagley High Schools, and Hagley First and Middle Schools) and to other community facilities. It is within easy walking distance of the railway station. There is direct access through Hagley to the A456 leading to Birmingham and to the A491 to Stourbridge, Dudley and Merry Hill. Because of Hagley's proximity to the conurbation, car journeys would be shorter than from most other settlements in the District. I note that although the Kidderminster/Blakedown/Hagley By-pass has been shelved, the route remains protected.

1.6.21 As regards potential constraints, I am satisfied that the site capacity limitations resulting from Brake Lane being a cul-de-sac can be addressed by the provision of an emergency access/egress through Brakemill Farm to/from Stakenbridge Lane.

1.6.22 All of these considerations have to be weighed in the balance. It is my conclusion that the sustainability and other benefits of the objection site are seriously outweighed by the harm that would be caused to Green Belt objectives through encroachment into the countryside. I believe there are more suitable ADR sites than this and I recommend accordingly.

1.6.23 Finally, on this first issue the objector has made reference to the Grade 1 Listed Building at Hagley Hall, the Grade 1 Historic Park and Garden and the numerous ancient monuments and Grade 1 listed structures in the Park, some of which are on the Buildings at Risk register. It is argued that income generated from development of estate land would assist in improving and maintaining those structures. These may be material considerations but I feel unable to give them a great deal of weight when assessing the most appropriate ADR provision.

1.6.24 **Issue 2:** Policy DS8 and its supporting text at Paragraph 8.19 are explicit. Together they indicate that Areas of Development Restraint are locations excluded from the Green Belt within which no development is proposed during the Plan period. Such information is reinforced through the Alvechurch Inset Plan Proposals Map. This shows the proposed ADRs falling within the settlement boundary; it also identifies the detailed Green Belt boundary around the settlement. In these circumstances I see no need for the further modification sought by Alvechurch Parish Council.

1.6.25 **Issue 3**: *(Alvechurch Brickworks, Alvechurch)* I have already dealt with a similar objection to Policy DS1 through which the Alvechurch Brickworks site is being promoted as safeguarded land (60/1018). I have previously concluded at Paragraph 1.3.20 of my report that this former Brickworks site should be designated as an ADR and the Green Belt boundary redrawn. The question of whether the land should be released for development before any other ADR in Alvechurch is a matter for consideration in the Local Plan Review.

1.6.26 **Issue 4:** Paragraph 2.12 and Annex B of PPG2 advise that when local planning authorities prepare new or revised structure and local plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan, and that they should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. Safeguarded land comprises areas or sites that may be required to serve development needs in the longer term, ie well beyond the plan period. This is as far as the advice goes. It does not specify a particular time horizon. The absolute minimum of a 15 years' supply of ADR land beyond the current Plan period recommended by the BDLP Inspector was his view of what should be provided in the circumstances prevailing at that time. He did, however, recognise that the figure was less than that suggested by Inspectors dealing with some other Local Plans. For reasons set out earlier in my report I have concluded that a time horizon of 2021 is now more appropriate. With this in mind and having regard to the lengthy process of debate and examination that has led to this conclusion I agree with the objector, David Wilson Estates, that the explanatory text should give some indication of the timescale over which it is anticipated the Green Belt boundary will endure. This can only be a rough estimate for, as the Council points out, it will depend upon many factors - not least of which are future national and regional planning guidance and strategic planning policy.

1.6.27 On the question of sustainability of ADRs, Paragraph B3 of Annex B to PPG2 indicates that safeguarded land should be located where future development would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development. While the Council has clearly followed that advice in its identification of ADRs, the text supporting Policy DS8 makes no reference at all to sustainability. Some additional, economical wording for

Paragraph 8.19 of the kind put forward by David Wilson Estates would I feel make the Plan clearer and the Policy more meaningful.

1.6.28 **Issue 5:** David Wilson Estates maintain that Policy DS8 and the list of ADRs in Appendix 3A should reflect the priority to be given to sites which satisfy most fully the objectives of sustainable development. Sites on the edge of Bromsgrove (BROM5 to BROM5D) and sites within public transport corridors (such as Barnt Green) should, it is argued, be allocated and developed before less sustainable sites in other locations.

1.6.29 I have already considered this matter in some detail in response to other objections addressed at the Round Table Session (see Issue 6, Paragraphs 1.2.39-1.2.42 of my report). I do not intend to repeat that analysis here, other than to point out that there is nothing in current planning policy guidance which would support the prioritisation of safeguarded land. While it is for the BDLPPM to decide which sites should be selected as ADRs, it is for the Local Plan Review to propose the development of particular sites having regard to the planning circumstances prevailing at that time. This would include an assessment of national and regional planning guidance then in force. I do not therefore propose to recommend adoption of the additional Paragraph 8.19A suggested by David Wilson Estates.

1.6.30 **Issue 6**: *(Land south of Station Road, Alvechurch)* Alvechurch is a large compact settlement centred on a small group of local facilities that includes a range of shops. It is served by a railway station located on its southern side which provides a high quality and frequent (half hourly in each direction) service between Redditch and Birmingham. There is also a regular bus service between Evesham and Birmingham. In terms of WCSP Policy SD4, Alvechurch is a sustainable urban location suitable to accommodate limited development beyond the Plan period. In recognition of this, and in accordance with the recommendations of the BDLP Inspector, it is proposed that the settlement be inset from the Green Belt.

1.6.31 The objection site is situated on the south side of Station Road beyond the village boundary drawn on the BDLPPM Proposals Map. The land extends in an arc from High House Farm in the north-east to the station car park and access road in the west. Although within pleasant countryside it does not form part of the Landscape Protection Area. An "indicative development solution" accompanied the objection. It shows, for illustrative purposes, residential development (2.83ha net), an area of open space adjacent to High House Farm, a new station car park in the north-west corner of the site, a new vehicular access to serve the station taken through the development from a point further to the east along Station Road, and a landscape buffer to the south and south-west.

1.6.32 Redrow Homes (Midlands) Ltd maintain that the objection site is a more sustainable option for future development than any of the 3 ADRs identified by

the Council at Alvechurch. Using a 'ped shed' analysis (ie catchment areas defined by a 10 minute or 800m walking distance) they show that only the objection site lies within all 3 of the 'ped sheds' drawn for the railway station, village centre and first/middle schools. ALVE6, 7 and 8 lie beyond the 'ped shed' from the railway station. The likelihood is, they say, that travel to/from those sites would be predominantly car borne - and once in their cars motorists would be reluctant to undertake a modal shift to public transport.

1.6.33 The objection site is situated immediately adjoining Alvechurch railway station. In terms of encouraging travel to work by public transport and discouraging use of the private car it must have a locational advantage over the currently proposed ADRs. However, to be a highly accessible location development must also be within 'easy walking distance of town, and local, centres' (Tapping the Potential). As the Council points out, to access the objection site from Alvechurch village centre necessitates walking up a steep hill - as opposed to ALVE 6, 7 and 8 that are all located on the same level and a comparable distance away. Moreover, the WCSP EiP Panel Report advised specifically in relation to rail nodes, that development should be concentrated within the 5 minute drive isochrone. ALVE 6, 7 and 8 are all well within that distance and therefore, by definition, in locations which provide an opportunity for travel by means other than the private car. Finally, there is an existing bus service running along Birmingham Road serving all 3 ADRs that is not available at the objection site. When these considerations are taken into account the advantages of the Station Road site are less marked.

1.6.34 Another benefit claimed by the objector relates to the opportunity to provide a new station car park and access. Policy ALVE3 states that "the District Council will encourage the provision of additional off-street parking in the vicinity of Alvechurch railway station in the event that rail service development justifies this." However, the same objective can be achieved by other means. Development of each of the ADRs would require the provision of community facilities. Clearly, BDLPPM Policies DS11 and S28 would enable the Council to seek financial contributions to meet the requirements of Policy ALVE3.

1.6.35 Turning now to the Green Belt implications of the proposal, I do not believe that building on the objection site would relate well to the surrounding pattern of development. Station Road forms a clear dividing line between the extensively built up area to the north and the mainly undeveloped countryside to the south. As such, it represents a strong, readily defensible Green Belt boundary. The open nature of the objection site can readily be appreciated when viewed from Station Road. In my opinion it fulfils important Green Belt functions of safeguarding the countryside from encroachment, inhibiting unrestricted sprawl and preserving the setting of the village.

1.6.36 The southern and eastern boundaries of the objection site are in elevated positions and are either weakly or arbitrarily defined. They do not accord with the advice

set out in Paragraph 2.9 of PPG2. This advocates the use of readily recognisable features such as roads, streams, belts of trees or woodland edges where possible. The deep landscaped margins shown on the objector's 'indicative development solution' amount, in my opinion, to tacit admissions of this fact. Such concern lends support to my view that this would not be an appropriate Green Belt boundary.

1.6.37 To sum up, I am concerned that the objection site is prominently situated in open countryside that performs vital Green Belt functions. It has poorly defined boundaries. Development here would not reflect the general form of the village but would intrude into its rural surroundings. While the land is located very close to the railway station and has potential to provide new access and car parking arrangements it is, on balance, only marginally more sustainable than ALVE6, 7 and 8. The latter are within reasonable proximity of the railway station, bus services and other village facilities. Moreover, they have the benefits of being well-contained with strong defensible boundaries and road frontages. In my judgement these sites enjoy a better relationship with the existing settlement pattern. I am satisfied that they would not impact adversely on the approach to or setting of Alvechurch. I can therefore see no justification for designating the objection site as safeguarded land, either as an addition to or in replacement of the ADRs promoted by the Council.

1.6.38 **Issue 7:** The objectors are concerned that development of ADR sites ALVE6, 7 and 8 would, by increasing the size of the village population, put undue strain on local facilities such as the village schools. Moreover, they object to any development that might cause local amenities such as the cricket or football clubs to close down or relocate.

1.6.39 The purpose of ADR designation is to provide a pool of potential development land excluded from the Green Belt on which to draw in the future to accommodate new housing and employment allocations. It is for the Local Plan Review to decide which of these ADRs are required during the period to 2011 and for what purpose. I am recommending that a further modest ADR be identified in Alvechurch at the Brickworks site, in addition to the 3 sites identified by the Council in the BDLPPM. However, I am satisfied that the overall level of provision would still be broadly proportional to the size and character of the settlement.

1.6.40 It is for the Council and other service providers to ensure that the growth and development of local infrastructure, including schools, is properly planned in order to keep pace with the demands placed upon them. Given the likely timescale of future development I see no reason why local amenities should be put under undue pressure.

1.6.41 As regards the loss of local sports facilities, none of the ADRs proposed in Alvechurch are currently in recreational use. There would therefore be no loss of

facilities or reason to relocate. In fact, the opposite would be more likely. A larger village population would be more able to support and maintain the viability of existing sports grounds.

1.6.42 **Issue 8:** *(Mill Farm, Radford Road, Alvechurch)* The objection site (taken as the area outlined in red on the plan attached to the objector's statement) extends to 2.1ha and falls within the Alvechurch Conservation Area. It is located to the south-east of the main core of Alvechurch village on the south side of Radford Road and to the east of houses fronting Swan Street. At its heart is a group of buildings known as Mill Farm, surrounded by Grade 3 agricultural land. Those structures comprise a mixture of brick buildings and Dutch barns accommodating a number of small engineering firms, builders and manufacturing concerns. The land lies within the confirmed Green Belt where it is necessary, if Green Belt boundaries are to be changed, for exceptional circumstances to be found. Immediately adjacent to the site are 2 Special Wildlife Areas and a Scheduled Ancient Monument.

1.6.43 The objector is seeking to have the objection site excluded from the Green Belt, incorporated within the Alvechurch settlement boundary, and identified as an ADR. In support of the objection, reference is made to national planning policy guidance set out in PPG2 in respect of safeguarded land, to the advice given in PPG3 concerning 'brownfield' and 'greenfield' housing sites, to the regional development strategy outlined in RPG11, and to strategic policy guidance established by the HWCSP and the recently adopted WCSP.

1.6.44 There are a number of planks to the objector's case. Firstly, it is argued that because Mill Farm comprises previously-developed land it is suitable as an ADR by virtue of the search sequence set out in Paragraph 30 of PPG3. This starts with the re-use of previously-developed land and buildings within urban areas. It is also contended that the site should be developed before ALVE 6, 7 and 8, given that Paragraph 32 of PPG3 establishes a presumption that previously developed sites should be developed before greenfield sites unless they perform so poorly in relation to the criteria set out in Paragraph 31. One of those criteria relates to the physical and environmental constraints on development of land. Secondly, the objection site is said to be more sustainable than other proposed ADR locations in Alvechurch in that it relates better to the built-up area, is within 70m walking distance of the village centre which includes a range of shops, and is relatively close to the railway station and other principal services. Finally, it is pointed out that the BDLP Inspector recommended Mill Farm be excluded from the Green Belt. His report pre-dated the publication of RPG11 and PPG3 which now place even greater emphasis on sustainability.

1.6.45 I shall examine each of these arguments in turn, recognising that Alvechurch is a sustainable settlement in a transport corridor that is proposed to be inset from the Green Belt and where a proportionate amount of ADR provision is considered appropriate. Looking first at the question of previously developed land, this is

defined in Annex C of PPG3. It covers the curtilage of the development - that is, all of the land attached to a building. However, this does not mean that the whole area of the curtilage should therefore be redeveloped. Where the footprint of a building only occupies a proportion of a site of which the remainder is open, as in this case, the whole site should not normally be developed to the boundary of the curtilage. In this instance there are a number of site constraints that would inhibit the extent of development.

1.6.46 The first of these is the archaeological significance of the area. Adjoining Mill Farm at the Moat House is the site of a medieval Bishop's Palace. This is a Scheduled Ancient Monument (SAM) – Hereford and Worcester County Monument No 195. It consists of the remains of an early 13th century palace for the bishops of Worcester, together with associated fishponds and other earthworks, and is of national significance. And the objection site itself is registered with Hereford and Worcester County Sites and Monuments Record. It is a site of archaeological interest in its own right, comprising a section of the medieval bishops' park and forming part of the historic core of Alvechurch, including a mill building. Concern is expressed by English Heritage that the likely impact of any development of the objection site on the setting of the adjacent SAM should be taken fully into consideration, in line with the requirements laid down in PPG16 (Archaeology and Planning). While there are ways of mitigating such impact, English Heritage recognise that it might prove necessary to restrict the area of development. I note also the views of the County Archaeological Officer in relation to the previous, smaller, objection site considered at the BDLP inquiry. Amongst other matters, he emphasised the importance of restricting any future development to the footprint of the main range of buildings to the west of the access track, the need to avoid development at the south-eastern end of the site in the area of the degraded park surrounding the moat, and the significance of the buried archaeology. I agree with the Council that the archaeological importance of this site and the need to protect the setting of the adjacent SAM represent significant constraints. They are likely, in my opinion, to restrict future development to an area no greater than the footprint of the existing buildings.

1.6.47 The whole of the objection site falls within the Alvechurch Conservation Area. An extension of built development beyond the existing group of buildings and projecting into the open areas of the site would in my view be highly unlikely to preserve or enhance the character or appearance of this part of the historic core of Alvechurch. I note that highway works to secure satisfactory access to the site could also result in the removal of sections of the northern brick boundary wall. This is a distinctive feature of this part of the Conservation Area which should be retained.

1.6.48 Thirdly, there are 2 Special Wildlife Sites identified adjacent to the site - the River Arrow and Old Fish Ponds. I agree with the Council that development of

the site to its full potential would be likely to adversely affect the wildlife significance of these areas.

1.6.49 Taken together, I believe these varied constraints severely restrict the potential of the site as an ADR, even though it constitutes previously developed land. The Council says that, subject to consideration of archaeological issues, it would not be opposed to redevelopment based on a footprint calculation of the existing buildings, providing such development does not extend beyond the area currently occupied by the main core of the buildings. I note that, including the garden area at the front of the site, this would amount to only 0.5ha. It would therefore contribute little to the supply of ADR land in Alvechurch and would be insufficient to substitute for any of the Council-promoted ADRs - ALVE6, 7 or 8.

1.6.50 As regards the sustainability of the site, it is situated near the centre of the village and in close proximity to many of its services. From a strictly locational point of view I accept that it is superior to the other ADR sites proposed and would help to balance the village and strengthen the centre. However, the selection of ADRs depends upon many considerations which must be weighed against each other. Amongst these are the Green Belt purposes fulfilled by the land. The objection site is confirmed Green Belt and performs 2 functions. It preserves the setting and special character of the historic core of Alvechurch and it assists in safeguarding the countryside from encroachment. Another factor is the relationship of the site to the built form of the village. While ALVE6, 7 and 8 form natural extensions, the objection site would intrude unduly into the surrounding countryside in a manner that is quite uncharacteristic of this compact settlement. When taken in conjunction with the archaeological, conservation area and nature conservation constraints I have outlined, I believe the site to be unsuitable as an ADR.

1.6.51 The BDLP Inspector recommended that the smaller site he considered at Mill Farm be excluded from the Green Belt. However, it is apparent that this was done in the context of his further recommendation to designate a substantial area of land at Lye Meadows on the southern side of the site as an ADR, and in the context of the need for a substantial increase in the amount of ADR land required. Having carried out a District-wide comprehensive study of potential sites, that further recommendation has not been accepted by the Council. Elsewhere in my report I have concluded that in the light of reduced housing targets in the WCSP it is no longer necessary to find the 230ha of safeguarded land recommended by the BDLP Inspector. In these circumstances I do not believe the objection site stands on its own as an ADR.

1.6.52 **Issue 9:** *(Hazy Hill Farm, 248A Old Birmingham Road, Lickey)* Hazy Hill Farm is located on the south-east side of Old Birmingham Road (B4096) abutting the urban area of Barnt Green/Lickey in an area of confirmed Green Belt, some 5.4km north-east of Bromsgrove town centre. It comprises a grid of 4 fields of pasture of roughly equal size, a fifth much smaller field at the rear of 260A Old

Birmingham Road, and a group of dwellings/barn conversions centred on a former farmstead served by a shared access drive - the whole site extending to approximately 7.3ha. The objector's revised drawing no MBA 2.1.1A, presented at the inquiry, shows a reduced area of land over that originally proposed. I shall make my assessment on that basis, rather than the site identified at objection stage which extended to the south-east as far as Mearse Lane.

1.6.53 Along part of the road frontage is a narrow strip of woodland. On the opposite side of the road, north of Alvechurch Highway, is a Landscape Protection Area designated under BDLPPM Policy C1. This is also an Area of Great Landscape Value identified in both the HWCSP and WCSP. To the south-east of the site is a deeper band of woodland. To the north-east is existing residential development at Pine Grove. More open land lies to the south-west although it includes pockets of built development, the most significant of which comprises the residential redevelopment of the former school for the blind at Grange Park.

1.6.54 The objector argues that insufficient ADR land has been identified and relies upon the arguments presented by the House Builders' Federation. I have already concluded on that issue and do not intend to repeat my assessment here, other than to say that I support the reduced level of provision made by the Council through the BDLPPM. This should, in my judgement, be sufficient to last until about 2021. There is therefore no imperative to find additional ADR land, over and above the total proposed in the BDLPPM.

1.6.55 I propose to examine the objection site in terms of both its Green Belt functions and sustainability. Looking first at Green Belt considerations, the land performs 2 important purposes. It helps to prevent neighbouring settlements from merging into one another and assists in safeguarding the countryside from encroachment. In terms of coalescence, the site forms part of the very narrow gap between Barnt Green and Marlbrook (the latter forming the northern section of the Bromsgrove urban area). In the event that the objection site was developed that open area would be reduced along the south-east side of Old Birmingham Road from approximately 0.9km to just 0.7km. In my view such development would seriously erode the effectiveness of the Green Belt in this most vulnerable location and would place the settlements at considerable risk of merging. I note this was also the view of the BDLP Inspector who commented that "Planning permission has already been granted for the redevelopment for residential purposes of the Lickey Grange blind school which lies within the gap. If the objection site were also developed there would only be one remaining area, in the vicinity of Firs Farm, where there was open countryside on both sides of the B4096. In these circumstances I consider that residential development of the objection site, or even part of it, would be clearly prejudicial to one of the main purposes of the Green Belt as set out in CSP Policy GB.1 9b). Even in the context of the need for more development land, that would be unacceptable." I concur with those sentiments.

1.6.56 As regards encroachment, I am concerned that development of the objection site would not simply round off the settlement of Barnt Green but would extend it along Old Birmingham Road, encroaching into the surrounding countryside. I acknowledge that there is existing tree screening along part of the road frontage and along the other site boundaries. Moreover, additional landscaping and open space are envisaged. However, development of such an extensive area of land would I am sure be clearly visible from the surrounding countryside and would cause demonstrable harm to the openness of the Green Belt.

1.6.57 Turning now to look at the sustainability of the site, the objector maintains that there is a contradiction between the BDLP Inspector's view that the objection site is not well positioned in relation Barnt Green railway station and the fact that the land is within the 5 minute car and 15 minute foot and cycle isochrones. I see no inconsistency. The isochrones were used as broad guidelines to provide a starting point to reject sites that were poorly related to a transport corridor. As the Council points out, not all areas within the isochrones are of equally sustainable merit; some are better than others in terms of their potential to reduce car travel and encourage the use of public transport, cycling and walking.

1.6.58 The Council has proposed an ADR at Twatling Road, Barnt Green (Area Policy BG5). Compared with that proposal, and various alternative sites promoted by objectors, land at Hazy Hill Farm is relatively remote from the railway station, beyond what many would consider as a reasonable walking distance. That would still be the case even with a pedestrian link to the junction of Mearse Lane and Plymouth Road across the adjoining woodland and fields - the distance reducing from 2.7km to 2.2km, as opposed to just 1km between the Twatling Road site and Barnt Green railway station. Furthermore, apart from the Lickey schools, the objection site is poorly located in relation to many of the other services and facilities that are concentrated in the centre of Barnt Green. Whilst there are some bus services, with connections to Bromsgrove, Halesowen and Redditch (routes 202/204, 82/83), these are not especially frequent. As regards the easy road link to the M5/M42 motorways this is likely to work against a modal shift to public and other more sustainable forms of transport.

1.6.59 Other arguments have been advanced by the objector. Firstly, it is contended that development of the site would help sustain local facilities, particularly the schools, petrol filling station/retail store, hairdressers and post office. But it seems to me that the same argument would apply to even greater effect in respect of sites closer to the centre of Barnt Green. Secondly, the objector criticises ADR proposals made at Perryfields Road, Bromsgrove. These are, it is claimed, poorly related to Bromsgrove railway station which has a less efficient rail service than Barnt Green, and take up Grade 1 agricultural land. This does not, however, compare like with like. Bromsgrove town is a very much larger and more sustainable settlement (36,560 population, as opposed to 2,734 at Barnt Green) where the District's long-term growth strategy requires that the majority of development needs will be met. As a consequence of that size differential,

acceptable travel distances to ADR sites will be significantly different. And as regards agricultural land quality, the presence of so much Grade 1 land around Bromsgrove town makes it inevitable that there will be some losses. This was a point recognised by the BDLP Inspector. Like the Council, I do not accept that looking to Barnt Green to provide replacement ADRs for those in Bromsgrove town is an appropriate and meaningful exercise.

1.6.60 Thirdly, the objector feels that the Twatling Road site is inappropriate as an ADR because it backs onto the Lickey Hills Country Park. I consider objections to that land elsewhere in my report. It seems to me though that the present objection site has a somewhat analogous relationship in that it adjoins an Area of Great Landscape Value and a Landscape Protection Area. Consequently, I believe the argument to be broadly neutral.

1.6.61 Finally, it is argued, and accepted by the Council, that the land is not subject to any infrastructure problems or environmental constraints such as contamination, stability or flood risk. Vehicular access can be readily obtained. I note also that it comprises Grades 3 and 4 agricultural land - which, in terms of Bromsgrove District, is of relatively low quality. These factors support the objection but are by no means unusual or unique.

1.6.62 To sum up, I consider that although not subject to particular constraints, designation of the objection site as an ADR would seriously harm the purposes of the Green Belt by encroaching into the surrounding countryside and by contributing to the eventual coalescence of Barnt Green and Marlbrook along the B4096. Moreover, the site is not well located in relation to Barnt Green railway station and other centrally situated facilities which are beyond reasonable walking distance, making the land somewhat less sustainable than other locations.

1.6.63 **Issue 10:** The objector is concerned that the BDLP Inspector may have been unduly swayed by developers and taken insufficient regard of local circumstances. It is not clear, he says, that the Council has undertaken any proper scrutiny of the proposed ADRs given that all of the proposals recommended by the Inspector have been accepted.

1.6.64 In order to ensure Green Belt boundaries endure, the BDLP Inspector concluded that the aim should be to provide an absolute minimum of 15 years supply of ADR land beyond the current plan period, ie to 2016, which he equated to a requirement in the region of 230ha. He recommended that the Council undertakes a comprehensive study of the whole District, not confined just to those sites considered at the BDLP inquiry.

1.6.65 This the Council has done, with its approach set out in Background Paper 2. This confirms that a full assessment was made of each of the 80 plus sites identified. Their relative merits were compared via a matrix employing a set of criteria. I am

satisfied that this demonstrates that local circumstances based on land use planning considerations formed a fundamental part of the review.

1.6.66 It is not true to say that all of the sites recommended by the BDLP Inspector were adopted by the Council. In fact, many of the sites were rejected - either because they were felt to perform significant Green Belt purposes and/or in light of the reduced need for safeguarded land as a result of a projection of the WCSP 2011 housing targets. I note that the sites examined also included land not considered at the BDLP inquiry. Two of those (FR4 and BROM5B) were subsequently selected by the Council and now form part of the BDLPPM proposals.

1.6.67 **Issue 11:** *(Little Heath Lane, Lickey End)* The essence of this objection has already been addressed in my consideration of Policy DS1 (see related objection 160/1071 – Paragraphs 1.3.26-1.3.29) when I found that the site contributes to the openness of the Green Belt. I have concluded that an ADR here would have an adverse effect on the countryside through encroachment. This would be disproportionate to its housing yield.

1.6.68 Having said that, I acknowledge that the land is within reasonable walking distance of a range of village facilities and services and, in addition to being just within the 5 minute drive isochrone of Bromsgrove railway station, there are regular bus services to Bromsgrove via Marlbrook and Catshill, and to Birmingham and Redditch. The site is therefore in a reasonably sustainable location. Moreover, it is Grade 3b agricultural quality which is not regarded as the best and most versatile land, and it has no particular biodiversity, landscape quality or heritage interest.

1.6.69 In spite of these attributes the site fulfils an important Green Belt function. In the context of a much reduced need for safeguarded land, relative to the situation perceived by the BDLP Inspector, I see no compelling need to designate the objection site as an ADR.

1.6.70 **Issue 12:** *(Birmingham Road/Braces Lane/Redland Close, Marlbrook)* Objection 1241/1072 relates to a 7.08ha parcel of land located outside the settlement boundary of Lower Marlbrook. The southern boundary comprises a recreation ground; the eastern boundary runs along the rear of the curtilages of properties in Redland Close and Cottage Lane; and the western boundary follows the curtilages of properties in Birmingham Road. Objection site 162/1072 is more limited in extent (1.56ha) and is subsumed within the larger site. Because the sites have no direct road frontage there is no obvious vehicular access.

1.6.71 Both sites lie within confirmed Green Belt. Neither was considered by the BDLP Inspector.

1.6.72 I am satisfied that the sites fulfil Green Belt functions of checking the unrestricted sprawl of large built-up areas and preventing encroachment into the countryside.

The land is open in character with much of it in an elevated position such that extensive built development would unacceptably intrude into the countryside above the northern ridgeline. This would result in a loss of containment to Lower Marlbrook when viewed from the north.

1.6.73 As regards their sustainability, I do not consider these sites to be as well located in relation to jobs, shops and other services as many other potential ADR sites. Apart from the recreation ground, there is a relatively narrow range of facilities available within easy walking distance. The land lies outside the 5 minute drive isochrones of Bromsgrove and Barnt Green railway stations. It is not therefore within a transport corridor, as defined by the County Council. In contrast, easy access from the sites to the Midlands motorway network is likely to encourage use of the private car and discourage a modal shift to public transport. Whilst there is a bus service (No 143) linking to Bromsgrove railway station, I note that the last bus leaves for Lower Marlbrook at 18.25 which, in commuting terms, is relatively early and inconvenient.

1.6.74 The aim of the Structure Plan transport strategy is to maximise the choice of travel modes available. Because Lower Marlbrook is not served directly by rail it is unable to compete with many other better located ADRs which have the benefit of both rail and bus services.

1.6.75 I conclude therefore that it would not be appropriate to designate these sites as ADRs for both Green Belt and sustainability reasons.

1.6.76 **Issue 13:** *(Land off Brake Lane, Hagley)* The objection site comprises 4.2ha. It lies to the south of Brake Lane and to the west of Woodland Avenue. Much of the land is subsumed within the larger (13.1ha) site proposed as an ADR by The Hagley Estate (see Issue 1 above). However, it excludes the curtilage of Oakwood and extends further to the west, with the western boundary formed by the line of the Monarch's Way long distance national public footpath route.

1.6.77 The objector's case is put on the basis that insufficient safeguarded land has been identified by the Council, that Hagley is a highly sustainable settlement that ought to be the focus for additional ADR provision, and that this particular site at Brake Lane is more suitable than those ADRs proposed in Bromsgrove as BROM5, BROM5B and BROM5D. The objector suggests that the Brake Lane site could be considered either as an addition to those sites, or could go some way towards replacing them.

1.6.78 I have already discussed, in connection with the RTS, the overall quantity of ADR land required and the timescale over which it should last. I have concluded that the 140ha (approx) proposed by the Council ought to be sufficient until about 2021 (see Paragraphs 1.2.6-1.2.27). This will ensure that Green Belt boundaries endure well beyond the Plan period. I have also considered the sustainability of Hagley, in general terms, and concluded that a slightly more generous provision

of safeguarded land should be made here than, for example, at other secondary settlements like Barnt Green, Alvechurch and Wythall (see Paragraphs 1.6.3-1.6.9). I shall examine later in my report, in more detail, the relative merits of the BROM5, BROM5B and BROM5D sites. In this section of the report I shall concentrate on the site-specific matters appertaining to the Brake Lane objection site.

1.6.79 The land lies within an area that has been confirmed as Green Belt. It performs a single Green Belt purpose - that of assisting in safeguarding the countryside from encroachment. The site does not, however, have well-defined boundaries. The western boundary is poorly marked and the southern boundary quite arbitrary. As a new Green Belt boundary it would not accord with the advice set out in Paragraph 2.9 of PPG2. This indicates that boundaries should be clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edges where possible.

1.6.80 The objector is critical of the Council's approach to ADR selection in that no assessment has been made of landscape character, visibility, variations within sites and the sensitivity of land to built development. Moreover, no appraisal has been made of the scenic quality of sites and their surroundings. The only landscape component has been the presence or absence of any formal landscape designations. Even on that basis, and taking into account the possible effects of development on the Green Belt, it is pointed out that the Council's assessment results in a lower score for the Crest site at Brake Lane, Hagley than for the proposed ADR allocation at Perryfields Road North, Bromsgrove (BROM5B). The objector has carried out a landscape appraisal and visual assessment of both the Hagley and Bromsgrove sites based on principles produced by the Countryside Agency and the Landscape Institute/Institute of Environmental Assessment. It is concluded that built development of the Brake Lane site would result in moderate landscape impacts and moderate to moderate/substantial visual impacts. This compares with moderate/substantial landscape impacts and substantial visual impacts for each of the Bromsgrove sites. However, this is not at all surprising for, as the objector notes, the Brake Lane site is very much smaller allowing a greater degree of visual enclosure.

1.6.81 The objection site was considered by the BDLP Inspector as part of Site D. This included not only the Crest land but also a larger area to the south, extending to the railway line. In recommending Site D for consideration as a possible ADR, the Inspector acknowledged that this was an attractive area of countryside but concluded that the visual impact of development would be limited mainly to viewpoints close to the site. As I have previously indicated in response to The Hagley Estate objection, I do not share that conclusion which was reached in the context of a search for a very much greater quantity of safeguarded land. In my opinion, residential development here would result in a significant degree of encroachment into the countryside that would undermine the main purpose of the Green Belt in this location, set a precedent for further incursions, and prove

harmful to the landscape setting of Hagley when viewed from the well-used public footpaths to the west. In this regard I note the views of the Hagley/Clent Local Plan Inspector who, when considering this site as part of a larger area extending to the railway line, stated that "…. development in this position, west of the railway, would be intrusive in a most attractive stretch of countryside. I consider, therefore, that the Green Belt boundary has been defined appropriately in the Local Plan, by being drawn tightly round the existing limits of the built-up area at West Hagley".

1.6.82 Turning now to look at the traffic implications of the Brake Lane proposal, the highway authority has conceded, after expressing earlier concerns, that the existing traffic-signal-controlled junction at Station Road/Worcester Road/Park Road has capacity to operate with the additional flows that would arise from residential development of the site. Their other concern relates to the cul-de-sac nature of Station Road which in the event of blockage through, say, an accident, could preclude access for emergency vehicles to the Brake Lane area. The Hagley by-pass would have afforded potential for improving access to this part of the settlement but I am told that this project has now been cancelled. While the road line remains agreed, the likelihood of its construction before 2011 is remote. Nevertheless, it seems to me that the question of secondary vehicular access is a matter that can be addressed in a variety of ways when considering housing and other allocations at Local Plan Review stage or, subsequently, when submitting a planning application. One solution might be to secure an emergency route across adjoining land from an alternative highway. Given the long-term nature of ADR provision, and the otherwise sustainable location of the site close to the railway station, schools and central facilities of Hagley, I do not regard this disadvantage as insurmountable.

1.6.83 Drawing together the strands of my appraisal, I am satisfied that Hagley represents a sustainable settlement that can and should accommodate a reasonable amount of safeguarded land. The objection site is not so constrained from an access point of view as to make it unsuitable for consideration as an ADR. However, I believe that these factors are outweighed by the likely visual impact of development in a scenically attractive location, the lack of defensible Green Belt boundaries to the west and south, the precedent that would be set for further development in the area, and the harm that would be caused both to the setting of Hagley and to Green Belt objectives by encroachment into the surrounding countryside.

1.6.84 I do not regard the comparison made with the BROM5, BROM5B and BROM5D sites, all of which were acknowledged by the objector's planning witness to be sustainable in the broadest sense, to be a particularly useful or meaningful exercise. The much more extensive nature of those sites, ranging in area from 13.9ha to 26.5ha, makes it inevitable that their impacts will be greater. Moreover, if the primacy of Bromsgrove town is to be maintained in recognition of its superior sustainability, there is little scope, in my view, for substitution of a

relatively small objection site at Hagley. Consequently, I do not support designation of the Brake Lane site as an ADR.

1.6.85 **Issue 14:** *(Old Birmingham Road, Lydiate Ash)* The substance of this objection has already been addressed in dealing with a parallel objection made in respect of Policy DS1 [Proposed Modification No DS/MOD5]. I conclude that there is no compelling reason to designate this site as an ADR nor to exclude it from the Green Belt. See Paragraphs 1.3.36-1.3.43 of this report.

1.6.86 **Issue 15:** *(Dovehouse Fields Farm, Hunnington)* The objector is concerned that insufficient ADR land has been identified through the BDLPPM to ensure that Green Belt boundaries will need to be reviewed only infrequently. Land at Dovehouse Fields Farm, Hunnington is promoted to make up the perceived deficit and to sustain the long term future of the village which is said to have a strong relationship with the metropolitan district of Halesowen.

1.6.87 I have outlined elsewhere in the report my conclusions on the quantity of ADR land required. In summary, I am satisfied that as a result of changes that have taken place since the BDLP Inspector reported - that is, much reduced strategic targets to 2011 and a likely continuing supply of brownfield/windfall sites - the 140ha or so of safeguarded land identified in the BDLPPM will be sufficient to last until about the year 2021, thereby ensuring the long term stability of Green Belt boundaries.

1.6.88 As regards the suitability of the objection site, I agree with the Council that it is poorly located in relation to the major settlements of the District. Although close to Hunnington and Romsley villages, the land lies outside any of the defined transport corridors. It is therefore, by definition, not a particularly sustainable location. Moreover, these 3 parcels of agricultural land, totalling some 85ha, form part of an extensive tract of open countryside. Their loss to built development would have a significant adverse effect on the Green Belt, the main purpose of which is to assist in safeguarding the countryside from encroachment. No exceptional circumstances have been advanced that would support such a level of ADR provision in this locality. On the contrary, rather than advocating the development of countryside, the thrust of PPG3 advice is to avoid the unnecessary take up of greenfield land by first developing, wherever possible, brownfield land identified by an urban housing capacity study. I conclude therefore that it would be inappropriate to select the objection site as an ADR.

1.6.89 **Issue 16:** *(Bleakhouse Farm, Wythall)* The objection site is situated close to the southern edge of the West Midlands conurbation. It comprises the southern section of a gap separating the settlements of Drakes Cross and Grimes Hill. Together with the area known as Hollywood, these urban areas form the larger composite settlement of Wythall. The site has a total area of 31.5ha, although only 12.4ha adjacent to the junction of Gorsey Lane and Station Road, Wythall is proposed as an ADR; the remainder would stay undeveloped as potential open

space. The site is currently used for grazing. I note that the farmhouse was demolished some years ago as a dangerous structure, with the remaining farm buildings now used for seasonal turkey farming and cattle rearing.

1.6.90 The sustainability of Wythall and its ability to accommodate some safeguarded land is acknowledged by the Council. It is proposed, through the BDLPPM, to designate ADRs of 5.1ha and 3.1ha at WYT14 (Land off Norton Lane, Grimes Hill) and WYT15 (Land at Selsdon Close, Grimes Hill) respectively, close to Wythall railway station.

1.6.91 The Council accepts that the objection site is also in a sustainable location. However, it argues that in light of the reduced requirement for ADR land compared with the figure envisaged by the BDLP Inspector when he reported in 1997, there is no need to identify further safeguarded land at Wythall. In the Council's view the sites proposed at WYT14 and WYT15 are superior in that they are physically closer to the railway station and avoid the need for any incursion into the gap between Grimes Hill and Drakes Cross.

1.6.92 The Green Belt in this area serves to separate Wythall as a whole from the Birmingham conurbation and to maintain the identity of the composites parts of the settlement. In terms of its landscape function, it brings green spaces into the village and maintains the sense of 2 settlements facing each other across a valley. The BDLP Inspector considered 2 objection sites which he distinguished as A and B. The first of these comprised all of the shallow open valley between Grimes Hill and Drakes Cross while the second, almost entirely subsumed within Site A, was confined to land at Bleakhouse Farm, Gorsey Lane. It is the latter (Site B) which I understand to equate to the present objection site. *{Note: designation of the whole gap as an ADR is subject of other objections - 1083/1432 and 1093/1433. These are dealt with later in my report at Paragraphs 22.3.58-22.3.70.}*

1.6.93 The BDLP Inspector saw the gap between Drakes Cross and Grimes Hill as important. He said "In simple terms, this gap of open countryside consists of a shallow valley between the built-up areas on higher ground. It is wide enough to maintain a sense of the physical distinctiveness of Grimes Hill and Drakes Cross. Site A consists of virtually the whole of this gap. If it were entirely removed from the Green Belt, to facilitate housebuilding, the sense of physical separation would be lost, contrary to the objective of Policy GB.1(b). That would be so, even if, as suggested by the objector, an open corridor were maintained along the stream. Such an open corridor, whilst no doubt a pleasant feature, would function more like an urban park than a stretch of open countryside. There would be material harm to an important Green Belt purpose." He went on to balance these disadvantages against the benefits of Site A, including its relatively low agricultural land quality and the possibility of some landscape and ecological improvements along the line of the stream. He concluded overall, that removal of

Site A from the Green Belt would be unacceptable. I concur entirely with those sentiments.

1.6.94 However, the BDLP Inspector took a different view with regards to Site B. He said "I am of the opinion that if development within Site B were strictly confined to the sector around the Bleakhouse Farm buildings, (inside the area coloured brown on objector's plan 17019), the impact on Green Belt purposes would be very limited. This sector is in an 'angle' between groups of established houses, would not lead to housing development straggling along Alcester Road or Lea Green Lane and is well clear of the bottom of the shallow valley. I conclude that when the importance of the need for some provision in Wythall is balanced against the impact on the gap, there are exceptional circumstances which could justify the consideration of this piece of land as a possible ADR." In general terms I support that stance, although I am not convinced as to the necessity to designate as safeguarded land the whole of the 12.4ha site proposed by the objector. I shall return to this point shortly.

1.6.95 I deal elsewhere in my report with objections to Policies WYT14 and WYT15. In short, my conclusions are that while WYT15 is appropriately identified as an ADR, WYT 14 is not. The latter fulfils the very important Green Belt purpose of preventing neighbouring towns from merging into one another. Future development of the land for housing, taken in conjunction with the ADRs already identified by Solihull Borough Council on the opposite side of the River Cole (totalling 33.9ha), would effectively result in the coalescence of Wythall and Tidbury Green. This I find to be unacceptable - even allowing for the planning permission that exists on the site for both indoor and outdoor recreational uses. The BDLP Inspector was of a similar mind. It seems to me that the rationale for promoting WYT14 has been unduly influenced by the objective of securing commuter parking at the railway station. However, Paragraph 62 and Annex E of PPG13 and Paragraph 3.17 of PPG2 now make it clear that in some circumstances, particularly where a development is small in scale, a park and ride scheme may be permissible in the Green Belt if it is the most sustainable option. There is therefore no longer any imperative to identify the site as an ADR.

1.6.96 A more appropriate area of safeguarded land would I feel be part of the objection site at Bleakhouse Farm which performs well against the Council's ADR selection criteria. The Council says that a Green Belt boundary using existing features cannot readily be defined around the existing farm buildings - unlike the situation at WYT14 and WYT15 where long-term defensible Green Belt boundaries exist in the form of existing residential development, the railway line and the River Cole, all of which conform to the advice in Paragraph 2.9 of PPG2. That may indeed be the case, with Green Belt boundaries having to follow field boundaries and hedgelines. Nevertheless, the site at Bleakhouse Farm is in a sustainable location, within walking/cycling distance of the railway station and close to local amenities and schools. By omitting the 2 middle fields immediately to the north of the farm complex from the area shown in brown on the objector's

drawing J6915/1, the size of the ADR would be reduced to about 6ha, roughly equating to that lost at WYT14. It would have only a slight impact on the openness of the valley separating Drakes Cross from Grimes Hill and would relate well to existing residential development flanking Station Road, The Spinney and Gorsey Lane. Moreover, it could potentially accommodate any new education facilities that might be required.

1.6.97 I see no reason for the ADR to be more extensive than this. I do not support a Green Belt boundary along the line of Shawbrook. The Green Belt boundary should, in my opinion, be drawn tightly around the ADR so as to exclude the remainder of the objection site and the rest of the Shawbrook Valley. In this way there should be no development pressures created for further incursions into the Green Belt.

1.6.98 **Issue 17:** Whether or not the Council has designated sufficient ADR land in the most appropriate locations has already been dealt with through my findings on the RTS discussions, and in response to a related objection to Policy DS1 [Proposed Modification No DS/MOD5] made by Billingham and Kite Ltd. See earlier sections of my report, in particular Paragraphs 1.3.44-1.3.50. I conclude that no further modifications should be made to the Plan as a result of this objection.

1.6.99 **Issue 18**: *(Ryefields Farm, Stoke Prior)* Stoke Prior is situated to the south of Bromsgrove town. It lies approximately 1km beyond the A38 at Stoke Heath which represents the current limits of the Bromsgrove urban area. The B4091 Hanbury Road provides the main vehicular access northwards. The Birmingham-Bristol railway line passes through the settlement, with the Droitwich and Worcester railway line branching off at this point. The village was at one time served by a station on the branch line.

1.6.100 The settlement is split into two parts. The principal housing area is concentrated around Shaw Lane to the west and consists largely of post-war estate development served by a limited range of community facilities that include a primary school, shops and doctor's surgery. To the east, along Hanbury Road is a smaller enclave of housing known as Foley Gardens. The church and village hall are detached, located at the junction of Shaw Lane and the B4091. Stoke Prior looks to Bromsgrove for all higher order services, such as secondary education, and is linked to the town by an hourly bus service. To the south of the railway is an extensive and long-established industrial area providing about 1900 jobs. Initial employers were Bayer (UK), adjoining Shaw Lane, and the Harris Brush factory, adjoining Hanbury Road, but the area in between has now been allocated for employment purposes. The Harris Industrial Park and Saxon Business Park extend to 16.6ha or so. As of October 2000, 8ha remained vacant with just 1ha still available for purchase.

1.6.101 The objection site, known as Ryefields Farm, takes up the whole of the land between the housing enclaves at Shaw Lane and Foley Gardens. The south-eastern boundary is formed by the railway line and the northern boundary by Shaw Lane/Hanbury Road. The site is some 24.3ha in extent and comprises interim Green Belt. It is mostly of Grade 3a agricultural quality, with a pocket of Grade 2 land, used as grazing on a temporary licence.

1.6.102 Objections were made in respect of the BDLP seeking the allocation of a much smaller area of land (9.3ha) than the current Ryefields Farm site, partly for housing and partly as an ADR. The BDLP Inspector's overall conclusion was that: "This is an 'interim' Green Belt area, and in the light of all the factors mentioned above, I conclude that this site should be considered as a possible ADR. However, I attach some importance to the question of a railway station to service the site. The Council may want to be satisfied that any future development of the site could and would include the construction of the station."

1.6.103 Stoke Prior is located close to Bromsgrove town but is not part of it. I agree with the Council that it is a more rural location than, for example, suburban locations such as Lickey End and Catshill flanking Bromsgrove to the north, and that it should be treated as a separate settlement in policy terms. The objection site does not form part of the narrow and vulnerable gap that separates Bromsgrove from Stoke Prior. Designation of the site as an ADR would result in some encroachment into the surrounding countryside. However, this is the case with most ADRs. Here, the presence of existing housing at Foley Gardens to the east acts as a back-stop. Coupled with the strongly defined boundaries formed by the embanked railway line to the south and Shaw Lane/Hanbury Road to the north, this serves to limit the degree of encroachment and the site's contribution to Green Belt purposes. This is confirmed by the study undertaken by the objector's landscape architect which concludes that, while the more sensitive areas of the site should be retained in open uses, the site as a whole does not make a strong contribution to either the wider landscape character or the perception of openness when viewed from the surrounding Green Belt.

1.6.104 Turning to look at its sustainability, the Ryefields Farm site lies within, although close to the limits of, the 5 minute drive isochrone of Bromsgrove railway station. In this respect there is little difference between this land and some of the more remote ADRs selected by the Council on the western and northern peripheries of Bromsgrove town, including BROM5D. Stoke Prior has a regular, although relatively infrequent, bus service and there exists a limited range of community facilities and services. Most significantly, there is a very considerable amount of employment in the immediate locality although, as the BDLP Inspector noted, it does not follow that future residents would necessarily obtain work in that employment area. Nevertheless, the juxtaposition of housing and jobs accords with the increased emphasis now placed in national planning policy guidance on promoting balanced, mixed-use development. Other benefits of the site include

the opportunity to sustain and enhance local facilities and services, and the lower agricultural quality of the land compared with, for example, BROM 5D.

1.6.105 For these reasons and others, the Council identified Ryefields Farm as a possible ADR when reviewing the comprehensive study of safeguarded land that had been carried out following the recommendations of the BDLP Inspector. However, just 6 months later, in July 2000, the situation was reassessed after further investigations. The Council concluded that the chances of securing a rail halt at Stoke Prior, which the BDLP Inspector had regarded as a significant advantage of the site, was most unlikely to happen. Neither Railtrack nor the train operators were enthusiastic. Their view was that an additional station would complicate the timetabling of local and inter-city services. Moreover, there were constraints on the rail network, improvements required at Bromsgrove station and insufficient passenger demand. In the light of a reduced need for ADR land, the Council resolved to omit the Ryefields Farm site in favour of a smaller area, which was regarded as generally more sustainable, located on the western periphery of Bromsgrove. The BROM5D site (13.9ha) provides an opportunity to foster mixed-use development, thereby addressing the geographical imbalance of employment land in Bromsgrove town.

1.6.106 It seems to me from what I have read and been told that there is little prospect of Stoke Prior securing a railway station of its own in the forseeable future The focus of attention has shifted between Deposit and Modifications stage from rail to improving the existing bus services - with 2 alternative bus enhancement options now being promoted. PPG3 and PPG13 both stress the importance of accessibility by a range of non-car modes, and the WCSP EiP Panel Report recommended the inclusion of bus as well as rail services in defining public transport corridors. This change does not therefore make the ADR proposal unacceptable. But it does, I feel, detract somewhat from the site's original claim for ADR status, particularly bearing in mind the strength of the BDLP Inspector's views and recommendation. I note also that in spite of the existence of extensive employment areas, Stoke Prior residents themselves have only a limited range of local facilities and services available. Moreover, the Highway Authority has expressed some concern that the existing roads surrounding the site are overloaded, with the result that major highway infrastructure works would be necessary to serve any future development.

1.6.107 Taken in combination, these factors lead me to the view that Stoke Prior is not as sustainable a location as many other parts of the District. WCSP Policies SD.6 and SD.7 direct the majority of future development to Bromsgrove town and interpret the sequential approach of PPG3. I concur with the Council that sites such as BROM5D, immediately adjoining the principal urban area of the District, are a better fit with the thrust of that strategic guidance than the Ryefields Farm site. While the EiP Panel Report acknowledged that other locations in the District were potentially capable of meeting growth, Stoke Prior was not one of the settlements discussed.

1.6.108 To sum up, I accept that development of the objection site would have a relatively modest impact on Green Belt purposes. However, because of its location on the limits of the 5 minute drive isochrone of the nearest railway station I see Ryefields Farm as a less sustainable option than other proposed ADR sites, particularly in the context of the overall level of safeguarded land now required. Unlike other settlements selected by the Council for limited ADR provision - such as Alvechurch, Barnt Green, Hagley and Wythall - Stoke Prior has only a limited range of local services and facilities and relatively poor road links. I do not therefore support designation of the objection site as an ADR.

1.6.109 **Issue 19:** The objector, David Wilson Homes (Western) Ltd, contends that Paragraph 8.19 of the Plan should be expanded to refer to Policy SD.6 of the WCSP, and should indicate that priority will be afforded in the Local Plan Review to the release of ADR sites adjacent to Bromsgrove town. It is also argued that BROM5 should have the highest priority because of its key role in securing a link road between the A38 and B4091 (Stourbridge Road).

1.6.110 I have already dealt with a related objection (1044/1388), along similar lines, made by David Wilson Estates as part of the RTS deliberations. I indicate at Paragraphs 1.2.39-1.2.42 that it would not be appropriate to introduce any preference or order of priority for the release of safeguarded land These are matters that should properly be considered at Local Plan Review stage in the light of circumstances prevailing at that time. To do otherwise would be to pre-empt those decisions, contrary to the thrust of the advice set out in Annex B of PPG2.

1.6.111 **Issue 20:** An objection in similar terms (1201/1402) has been made by the Government Office for the West Midlands in respect of Policy DS1 and Proposed Modification No DS/MOD5. I deal with this matter at Paragraphs 1.3.51-1.3.57 of my report. My recommendation on that objection appears in Paragraph 1.3.91 and applies equally to objection 1202/1402.

1.6.112 **Issue 21:** *(Land at the M5/M42 junction, north of BROM5B)* The objector contends that land immediately adjoining BROM5B on its northern side, extending to the M5/M42 interchange, is highly sustainable and should be designated as an ADR. This would, it is argued, establish firm Green Belt boundaries and enable the construction of a local distributor road between Stourbridge Road and Fockbury Mill Lane as part of a more extensive western/northern relief route around the outskirts of Bromsgove town, from Kidderminster Road to Birmingham Road, funded by developer contributions and secured through S106 planning obligations. A 20m wide tree planting belt is proposed along the motorway perimeter to help contain CO_2 emissions and provide a visual and sound barrier between traffic and residential property.

1.6.113 The Council accepts that this interim Green Belt site has a number of advantages in that it lies within the 5 minute drive isochrone of Bromsgrove railway station, has no known constraints in terms of access, bio-diversity or archaeological

interests, and its development would help fund the construction of a new link road. However, on the other side of the equation are some serious negative factors. Firstly, the land is of high agricultural quality (Grades 1 and 2). Secondly, because it adjoins the junction of 2 busy motorways, it is likely to be badly affected by noise and pollution. Thirdly, and most importantly, development of the site would extend Bromsgrove town northwards reducing the viability of the visually and functionally important Green Belt gap between Bromsgrove and Catshill. I note the Council's statement that concern for this overriding principle caused it to restrict the extent of the BROM5 and BROM5B ADR proposals.

1.6.114 My view is that there is no need to identify additional ADR land, in excess of the 140ha or so proposed in the BDLPPM, for reasons I have set out earlier in my report. Furthermore, this site is not suitable as a substitute for any of the other ADRs proposed. Its development would, I believe, seriously harm one of the most important purposes of the Green Belt around this north-westerly sector of Bromsgrove town - which is to prevent the merging of Bromsgrove and Catshill. I note what the objector has to say about the intervisibility of those settlements, the difficulties of urban fringe farming, the emphasis in PPG3 on the most efficient use of land, and the criticisms made of the weightings in the Council's ADR study. Nevertheless, they are insufficient to outweigh what I perceive to be fundamental planning objections to the designation of this site as an ADR. I address elsewhere in my report the suitability or otherwise of the adjoining sites at BROM5 and BROM5B.

1.6.115 **Issue 22:** *(Halesowen Road, Lydiate Ash)* I have already addressed the suitability of land at Halesowen Road, Lydiate Ash as an ADR. This has been done through my consideration of related objection 261/1411 made in respect of Policy DS1 and Proposed Modification No DS/MOD5. My assessment is set out at Paragraphs 1.3.66-1.3.71 of the report. In brief, I conclude that it would be inappropriate to designate this site as an ADR. It lies in an unsustainable location outside the main urban areas of the District and beyond a rail corridor, fulfils important Green Belt functions and is subject to environmental constraints.

1.6.116 **Issue 23:** *(The Fordrough, Wythall)* This issue has been dealt with in my consideration of a related objection (932/414) made in respect of Policy DS1 [Proposed Modification No DS/MOD5]. See Paragraphs 1.3.72-1.3.77 of my report. In summary, I conclude that there is no need for further housing at Wythall within the Plan period, and that the benefits of developing this brownfield site at The Fordrough are comprehensively outweighed by the important Green Belt functions performed by the land.

1.6.117 **Issue 24:** *(Church Road, Catshill)* The objection site comprises a vacant, triangular parcel of land, 6.12ha in extent. It is in 2 ownerships, divided by the line of Battlefield Brook which runs north-south. The easterly portion (site 1020/1421 - Mr and Mrs G Riley) is approximately 2.05ha in extent and the

westerly portion (site 1019/1420 – Land and Leisure Ltd) some 4.07ha. The site forms a wedge of open land separating suburban housing development in the main core of Upper Catshill from frontage residential development flanking the east side of the B4091 Stourbridge Road. The M5 motorway runs to the north-west, with the southern boundary, at the apex of the site, defined by Church Road. Although the land is in private ownership with no public rights of access, there is evidence that trespass regularly occurs, with dog walking and other informal recreational pursuits taking place. In parts it is heavily overgrown, with a line of trees in poor condition following the brookcourse. The land is elevated in the north-west corner where there is a steep gradient.

1.6.118 It is proposed that approximately 9.06ha be removed from the Green Belt at this point. This would allow the Green Belt boundary to follow the M5 which is the most defensible boundary. Although not currently in farming use, it has been classified by MAFF as Grade 3 agricultural land. Given the site's relatively poor drainage and topography, it is, in my opinion, more likely to be Grade 3b than 3a and therefore not the 'best and most versatile' land. This would make it of a significantly lower quality than the ADRs around Bromsgrove town. The site lies within the confirmed Green Belt and is designated as a Special Wildlife Site. It was recommended by the BDLP Inspector as a potential ADR.

1.6.119 Looking first at its Green Belt function, the Council says that it assists in preventing encroachment of urban development into the surrounding countryside and has considerable open space value. That is not the way I view the site. Over the last few decades housing has advanced on 3 fronts. I note that land at Mayfield Close to the north-east, also within the confirmed Green Belt, was allocated for residential development in the 1982 draft Bromsgrove Local Plan and has subsequently been developed. In 1989 the objection site itself was identified by the Council as part of a Preferred Housing Site, with the District Planning Officer commenting that its development would round off the settlement. I note that a section of that larger site, at Marsh Way, has since been developed for residential purposes under a 1995 planning permission. Again, that land currently remains in the confirmed Green Belt, although it is now proposed for exclusion under the BDLPPM proposals. A third area of land that the Council intends to take out of the Green Belt is the ribbon of houses along the east side of the B4091.

1.6.120 In addition to these changes, the M5 motorway was constructed during the mid-1960s. This major highway has effectively severed the objection site from the wider Green Belt beyond, causing it to form nothing more than a wedge of open space dominated by urban influences on all sides and suffering from urban fringe problems such as trespass and fly tipping. All of these alterations lead me to conclude that the objection site no longer serves a vital Green Belt purpose. Indeed, its development for housing would help to repair what is at present a rough, untidy and raw urban edge along its eastern side. The BDLP Inspector was of a similar view. He remarked: "I agree with the Council that at the extreme

north-west corner, where the site is higher and the motorway is not on embankment, housing might be visible from the north, and an impression of Catshill extending into open countryside might be created. That apart, I believe that development of this land would have quite limited implications for the functioning of the Green Belt."

1.6.121 Turning now to the sustainability of the site, this appears to be the main objection of the Council in that it is located beyond the 5 minute drive isochrone of Bromsgrove railway station, at a distance of 4.7km. It would not therefore maximise the public transport options available. However, it is accepted in Paragraph 3.17 of RPG11 that transport corridors also include bus corridors, and it is noted elsewhere in the guidance that travel by bus is the dominant form of public transport in the Region. A decision to exclude this site from further consideration was evidently made by the Council prior to publication of the WCSP EiP Panel Report. That document not only endorsed the inclusion of bus corridors but made recommendations as to what might be considered to be frequent and attractive public transport services. I note that the Bromsgrove to Birmingham bus corridor passes through Catshill/Lickey End/Marlbrook. It has an impressive overall bus frequency of 15 minutes. This is in contrast to Bromsgrove railway station which does not, at present, support a frequent and attractive rail service. In fact, it fails to meet a significant number of the Panel's suggested criteria. These include: a 30 minute clock-face off-peak service, including evenings; a minimum 20 minute peak hour service; trains at least 3 coaches in length at peak times; no long distance standing; good interchange facilities, including car parking, set down/pick up, and cycle racks; a range of feeder bus services; quality information systems; and a good passenger environment. While improvements suggested in the Local Transport Plan are intended to address these criticisms, a significant number remain to be implemented.

1.6.122 As regards other indicators of sustainability, Catshill is accepted by the Council as being within or adjacent to Bromsgrove town for policy purposes. While it does not offer a great deal in the way of employment opportunities, it provides a range of services and facilities, including a local shopping centre; clinic; first, middle and special schools; clubs and public houses; and churches. The BDLP Inspector commented: "In brief, it is a very acceptable location for some growth, subject to Green Belt and site specific constraints". I concur with that assessment.

1.6.123 This leads me to the various constraints that are said to apply in respect of this land. Firstly, the Council's ADR study ascribes a score on grounds of archaeology. This relates, apparently, to the adjacent parish church. Subject to normal development control considerations I do not believe the setting of that church need be compromised in any way by development of the objection site - particularly since it is separated by a strip of land in yet another ownership. The second constraint concerns noise nuisance and pollution from traffic passing along the M5. Following the hearing at which these objections were heard,

discussions took place between an acoustic consultant acting on behalf of the objectors and Officers of the Council's Environmental Health Department. It was agreed and recorded that the provision of an appropriate physical barrier on the edge of the site adjacent to the motorway would be sufficient to mitigate unacceptable noise levels. In any event, it is unlikely that development would take place within 70m or so of the motorway boundary.

1.6.124 Thirdly, the site is designated as a non-statutory Special Wildlife Site by the Worcestershire Wildlife Trust because it contains several species of plant that are quite rare in Bromsgrove. 'Catshill Marshes' may be the largest area of marshland within the District, but I do not see this as a major constraint. The wildlife corridor along the course of the Battlefield Brook could be readily accommodated in the ADR proposal and, if necessary, excluded from a subsequent housing allocation. The BDLP Inspector also recognised that: "development clear of the stream could take place without material harm to this important interest." Related to this is the issue of flooding. The Environment Agency's indicative floodplain maps show the extreme southern part of the site lying within a floodplain. Whether this matter can simply be addressed by improvements to the culvert under Church Road, as suggested by the objectors, is a matter for subsequent investigation. PPG25 (Development and Flood Risk) recognises that engineered flood reduction measures may not always be the appropriate solution, since they can have economic and environmental costs and impacts on the natural and built environment, need maintenance and replacement and cannot eliminate all risk of flooding. Nevertheless, on the information before me, I do not see flood risk as a serious constraint over most of the site. Development can be restricted to those areas beyond the floodplain. The final constraint is one of topography, with the north-western part of the land rising steeply at a maximum gradient of about 1:6. This area of land is, however, most unlikely to be developed in any event. Not only are the gradients steep but it is the most elevated and visually exposed part of the site, and subject to greatest levels of traffic noise.

1.6.125 Drawing together these various strands, I accept that there are a number of physical and environmental constraints to development of the objection site. However, none of these, in my view, are so compelling either individually or collectively as to rule out this ADR proposal. Neither do they so limit the potential area of development as to preclude a reasonable housing yield. When considered in relation to the very limited Green Belt function of the land, its general sustainability and its lower agricultural land quality, I conclude that exceptional circumstances exist which make this site suitable for identification as an ADR - in substitution for other, less acceptable proposals which I assess elsewhere in my report.

1.6.126 On the question of an appropriate Green Belt boundary, I support that shown at Plan 3 of the objectors' hearing statement. This follows the southern edge of the M5 from the B4091 Stourbridge Road north-eastwards to where it abuts existing

residential development. It provides a strong, defensible Green Belt boundary of the kind suggested in PPG2. As regards the land between that boundary and the proposed ADR, it could, if necessary, be protected by a strategic open space policy. That is, however, a matter for the Council and I make no specific recommendation in that regard.

1.6.127 **Issue 25:** *(Rocky Lane, Catshill)* The objection site is located in confirmed Green Belt on the western side of Catshill, adjoining the M5 motorway which, along this section, lies in a cutting. The southern boundary of this 0.23ha field is formed by Rocky Lane which bridges the M5 immediately to the west. A public footpath and access track marks the eastern boundary. This runs between 4 dwellings, to the north of which are further open fields.

1.6.128 The objector argues that this land should be identified as an ADR. It lies within the area of Bromsgrove town (defined in the BDLPPM to include the urban areas of Lickey End, Catshill and Marlbrook) where future development will be concentrated. The M5 motorway, being a firm and defensible boundary, should, it is contended, logically form the Green Belt boundary in this location.

1.6.129 I agree with the Council that this land fulfils a significant Green Belt function. It assists in preventing encroachment into the surrounding countryside. The field is in an elevated position, helping to screen the urban area of Catshill to the east. There are views of the site from the Rocky Lane motorway bridge to the south-west. Development of this field would I believe break the skyline causing buildings to unacceptably intrude into views from the adjoining countryside. I note the BDLP Inspector's findings in respect of land further to the south at Dale Close. In recommending that site as a possible ADR he concluded that it need not be kept permanently open to achieve Green Belt purposes. However, I consider the 2 parcels are not directly comparable. The present objection site is at a higher elevation such that any development there would be particularly obtrusive. I consider in more detail the Dale Close site later in my report in response to other objections.

1.6.130 Catshill is well served by frequent bus services between Bromsgrove and the Birmingham conurbation, with links to many intermediate destinations. There is no service along Rocky Lane itself, but residents would be able to access bus stops in Stourbridge Road, some 200m distant, via the adjoining public footpath. Having said that, the site lies outside the 5 minute drive isochrone of both Bromsgrove and Barnt Green railway stations. This means there would be no opportunity to maximise the different travel options available, which is an important objective of the WCSP strategy. Consequently, while this site is accessible by public transport and reasonably close to local facilities in Catshill, it is not in my view as potentially sustainable as other proposed ADRs and likely to result in some increased car-borne activity. I reach this conclusion even in light of the deficiencies of the rail service from Bromsgrove station which are acknowledged to be in need of some improvement.

1.6.131 The objection site comprises Grade 2 agricultural land which is recognised as some of the 'best and most versatile' farmland in the country. While it may be comparable to, or even slightly lower in quality than, other safeguarded land identified by the Council around Bromsgrove, and is close to the motorway and urban uses, I cannot accept that it is of no agricultural value. The land was used in the early 1960s as one of the M5 motorway construction compounds, and again in the 1980s when the motorway was widened from 2 to 3 lanes. But no firm evidence has been supplied, by way of survey or other material, that the land was not properly reinstated and that there remain hard surfaces beneath the topsoil rendering the land unsuitable for agriculture.

1.6.132 The site immediately adjoins the M5 motorway and is therefore likely to be subject to some traffic noise nuisance and pollution. I have received no detailed evidence in relation to these matters but in my view they are likely to lend support to my overall conclusion that this is not an appropriate ADR site.

1.6.133 In summary, I find that this site fulfils an important Green Belt purpose and is not as sustainable as many other options. I do not therefore support its designation as safeguarded land.

1.6.134 **Issue 26:** *(Land adjoining former Recovery Hospital, Blackwell)* The objection site comprises 2 fields, seemingly unused. It lies to the south-west of Blackwell, which is a small settlement inset from the confirmed Green Belt. The boundaries of the site are formed to the north by a field and the curtilage of Leahyrst Residential Home, to the south by a single track road leading to Laurel Bank Mews, to the east by the rear of the curtilages of properties in Station Road, and to the west by a field where the land falls sharply away as an escarpment.

1.6.135 This site was not considered by the BDLP Inspector although he did examine other proposed ADR sites in Blackwell. He found that "Blackwell is not particularly favoured from the point of 'sustainability', and as a possible focus for future growth". I concur with that assessment. Although within 15 minutes cycling distance of Barnt Green railway station and on a regular hourly bus route linking Bromsgrove with Birmingham, the settlement has only a limited range of facilities. It does not perform well in relation to the guidance on accessibility to jobs, shops and other services set out in PPG3 and PPG13 - and nowhere near as well as many of the ADRs promoted by the Council around Bromsgrove and the larger secondary settlements.

1.6.136 The objector argues that the land is already effectively contained by built development on 3 sides. There is indeed some development around the site. However, in my view the extensive curtilages of many of those neighbouring properties do not detract from its openness. Quite the reverse. They serve to detach the objection site from the settlement proper. Like the Council I see this parcel of land as being within an essentially rural location in open countryside. I note that redevelopment of the Blackwell Recovery Hospital to provide 32

terraced houses (now known as Laurel Bank Mews) was granted planning permission in the early 1990s before the January 1995 revision of PPG2. At the time it was not regarded as inappropriate development.

1.6.137 The objection site serves an obvious Green Belt purpose. It assists in safeguarding the countryside from encroachment. While virtually all ADRs result in some degree of encroachment, this site would elongate, and be out of keeping with, the existing form of the settlement. It would I feel unacceptably intrude into its rural surroundings and add pressure to develop in a northerly direction towards Greenhill Road. Moreover, the new Green Belt boundary sought by the objector would, compared with that proposed by the Council in the BDLPPM, take in a considerable amount of backland, adding over time to the urbanisation effect of the proposed ADR.

1.6.138 On the generalised agricultural land classification map the land is shown as Grade 3. Being of lower quality than many of the ADRs around Bromsgrove this adds to the attraction of the site. But it does not in my opinion warrant the conclusion that the site is of limited agricultural value.

1.6.139 In addition to its Green Belt function and relative lack of sustainability, I am concerned that there is no obvious suitable vehicular means of access to the objection site. As I have previously indicated, the road serving Laurel Bank Mews is single track. It currently serves about 38 dwellings. It would I believe need to be improved considerably to serve an ADR of the size proposed. This adds to my conviction that this would not be an appropriate ADR.

1.6.140 **Issue 27:** *(Westfields, Catshill)* The objection site comprises 2 adjoining fields in agricultural use, together totalling 2.5ha, situated on the western edge of Catshill alongside Christ Church Cemetery and the cul-de-sac known as Westfields. The land lies within the area of Bromsgrove town defined in the BDLPPM. The southern-most field reaches up to the boundary with the M5 motorway; the other is separated from it by further agricultural land.

1.6.141 The objector argues that the site should be designated as an ADR with a new defensible Green Belt boundary drawn more widely to follow the M5 motorway between Rocky Lane and the B4091. An alternative, less radical, Green Belt boundary is also suggested. Although Grade 2 agricultural land, the site is of a lower quality than some ADRs promoted by the Council elsewhere around Bromsgrove Town and, in the objector's view, of limited agricultural value because of its proximity to the motorway and urban uses. In sustainability terms, the land is close to local facilities in Catshill and well served by buses to Bromsgrove and the conurbation. Those services are of a much greater frequency than the rail connections between Bromsgrove and Birmingham.

1.6.142 Looking first at Green Belt purposes, this land assists in protecting the countryside from encroachment. The land rises steeply from its southern end,

levels off in the middle to form a plateau of higher ground, and descends at the northern extremity. There is a public footpath through the middle of the site connecting the village of Bournheath with Catshill via a footbridge across the M5 motorway. Views of the land from the east are largely obscured by the housing development at Westfields. However, from the south on the Rocky Lane motorway bridge and from the north on the Stourbridge motorway bridge, the fields are readily visible serving to conceal, in large measure, the urban area of Catshill beyond. Development of the elevated central section of the objection site would break the skyline and form an obvious and incongruous intrusion into this area of confirmed Green Belt.

1.6.143 Turning now to matters of accessibility, the objection site falls outside the 5 minute drive isochrones for Bromsgrove and Barnt Green railway stations. While there are regular and frequent bus services available by way of alternative, selection of this site as an ADR would fail to maximise the choice of modes of public transport for residents. Consequently, the objection site is not, in my judgement, as sustainable as other ADR options promoted by the Council.

1.6.144 As regards the quality of this agricultural land, I do not accept that it is of limited value. It comprises mostly Grade 2 land which is defined as amongst the best and most versatile. In confirmation of this, I note that the land is currently used for grazing with adjoining land laid to arable farming.

1.6.145 I consider that the Green Belt objection and the sustainability concern I have outlined are sufficiently compelling in their own right for me to reject this proposal. However, there are also physical and environmental constraints. The likely traffic noise nuisance and pollution affecting those parts of the site closest to the motorway and the lack of an obvious means of vehicular access tend to support my overall conclusion. I see no reason why the Green Belt boundary should be redrawn in this location to follow the M5.

1.6.146 **Issue 28:** *(Kendal End Road, Barnt Green)* The objection site comprises an irregular shaped parcel of land infilling much of the open area between Fiery Hill Road, Kendal End Road, Cherry Hill Road, and the rear of dwellings in Cherry Hill Drive, Barnt Green. It excludes the Barnt Green Inn hotel/public house/restaurant (a Grade II listed building), situated at the junction of Kendal End Road and Cherry Hill Road, and the cricket ground and adjoining Cherryhill Coppice, both of which have a frontage to Cherry Hill Road. The site extends to approximately 5ha and comprises fields currently used for grazing on an annual licence. The site is located close to the village centre, virtually opposite Barnt Green railway station.

1.6.147 It is proposed that the site be designated as an ADR, either by way of addition to the Council's proposals or in substitution for the 7.8ha of Policy BG5 (Land off Twatling Road, Barnt Green).

1.6.148 I agree with the objector that the choice of ADR sites has to be informed by current national planning policy guidance, principally PPG3 and PPG13, and the WCSP. Together these outline a systematic approach to assessing the appropriateness of potential housing sites and a search sequence that allows (when other possibilities have been exhausted) for the development of Green Belt land if that would create a sustainable pattern of development. They also require an assessment against the criteria set out in Paragraph 31 of PPG3. Transport corridors form the basis of that analysis, with sites being selected which offer the best potential for minimising the number and length of journeys in total and which maximise the prospects of securing the use of public transport, walking and cycling, instead of the private car.

1.6.149 The objector criticises the Council's ADR study which does not make specific reference to PPG3. I am satisfied, however, that the District-wide assessment of ADRs was undertaken in the context of the most up-to-date guidance available at the time, using the sustainability values established by the BDLP Inspector. Those principles anticipated, to a large extent, the advice subsequently issued through PPG3. Furthermore, the general approach of PPG3 was contained in RPG11. While that regional planning guidance was only finally published in 1998 the main principles were known to the BDLP Inspector when he reported in 1997. What is required now is that a proper balance be struck between the quantity of ADR land needed, the impact on Green Belt purposes and the imperative of securing sustainable forms of development.

1.6.150 Examining first the Green Belt issue, the Council contends that development of land north of the railway line would encroach into confirmed Green Belt and narrow the vulnerable gap between Barnt Green and Kendal End. In support of that argument the Council refers to the BDLP Inspector's recommendation in respect of a site on the opposite (east) side of Kendal End Road where he concluded that there should be no alteration of Green Belt boundaries. Reference is also made to an appeal decision on an adjoining site. It seems to me, though, that the situation is somewhat different on the western side of Kendal End Road. Here there is no housing like at Kendal Drive and no straggle of development and the land is much more open. In my view, infilling the space between the junction with Fiery Hill Road and the Barnt Green Inn would do little to reduce the separation of Barnt Green and Kendal End, while serving to round off the settlement. A fairly substantial gap of open countryside north of Cherry Hill Road would remain as a buffer.

1.6.151 As regards encroachment, virtually all ADRs impinge on this Green Belt purpose to some degree. In my opinion, encroachment would not be a serious problem in this case. The sunken country lane that is Cherry Hill Road could be used to form a strong and defensible Green Belt boundary, separating the objection site from the Landscape Protection Area of the Lickey Hills Country Park to the north. Some adjoining land, not intended to form part of the ADR, would also need to be taken out of the Green Belt to achieve the most logical boundary. I do not,

however, see that as a significant issue. On adoption of the Plan there would be adequate policies in place to ensure protection of the setting of the Grade II listed building, retention of the recreation ground, and conservation/preservation of the area of woodland contained within the wider block formed by Fiery Hill Road, Kendal End Road, Cherry Hill Road and Cherry Hill Drive.

1.6.152 Turning now to matters of sustainability, it would be difficult to find a site of this size in a more sustainable location. Barnt Green village centre with its range of local facilities and services is within very easy walking distance. Likewise, the railway station is virtually adjacent to the site. Most importantly, PPG13 recognises that walking offers the greatest potential for diverting people from their cars for short trips of under 2km. In addition, there are regular bus services passing along Fiery Hill Road. All of these factors lead me to the view that the objection site is a highly sustainable option. Its designation as an ADR would not create further pressure for additional commuter parking at the station but would minimise car use.

1.6.153 The Council acknowledges that this site is closer to Barnt Green railway station and other local facilities than the BG5 (Twatling Road) site. However, it makes the point that even using the longest route to the station and village centre (avoiding the steep, unsurfaced and unlit Cherry Hill Drive footpath), the furthest extremity of BG5 is still within a 2km walking distance and therefore eminently sustainable as a location for further development. Moreover, there is also a limited bus service passing along Twatling Road. In the Council's view, the slight advantage of the objection site over the BG5 site in terms of accessibility is outweighed by the greater harm done to the Green Belt. The Council points out that the Twatling Road site is well-contained by existing development, with the dense Pinfields Wood abutting the site on its north-eastern boundary. In its view, there would be little risk of further encroachment into the Green Belt.

1.6.154 That is not, however, the way I assess the relative merits of the 2 sites. The objection site is clearly the more sustainable option. It is, furthermore, separated from the Lickey Hills Country Park, a designated Area of Great Landscape Value and a Landscape Protection Area, by a strong hedgeline and the buffer of Cherry Hill Road. This is in contrast to the BG5 site that immediately abuts the section known as Pinfields Wood which is used extensively for informal recreational purposes. Unlike the BDLP Inspector, I am seriously concerned that juxtaposition of residential development at BG5 would damage the setting of that important area of amenity woodland. Earlier housing development that has taken place further along Twatling Road, which I saw on my site inspections, gives me little confidence that the interface would be well handled and that an appropriate setting would be maintained. I address this issue in more detail later in my report when I consider objections to Policy BG5. In terms of encroachment into the Green Belt I am satisfied that there is little to choose between the 2 sites. The expansion of both would be effectively precluded by the presence of the Country Park.

1.6.155 A particular advantage of the objection site is in relation to the likely density of development and its ability to accommodate a broad range of housing needs to promote mixed communities - including accommodation for single persons, the elderly/infirm and social housing. It is situated immediately adjacent to an area of medium density development centred on the railway station where building in accordance with PPG3 advice at 30-50 dwellings per hectare would yield somewhere between 150 and 250 dwellings. By way of contrast, the BG5 site lies within an area of different character that has been developed at a very much lower density, with most recent examples yielding just 9 or 10 dwellings per hectare. The objector points out that even assuming double the density than has hitherto been allowed in Twatling Road (say 18-20 dwellings per hectare), the BG5 site would only produce somewhere between 140 and 150 dwellings in total - well below the minimum of 30 dwellings per hectare that PPG3 says should be avoided because it represents an inefficient use of housing land.

1.6.156 Drawing together these various strands, I conclude that development of the objection site would have little effect on the purposes and integrity of the Green Belt and, in particular, would not contribute to the merging of Barnt Green and Kendal End. Given its high degree of sustainability and encouragement to the use of public transport, particularly rail, and its advantages over the BG5 site, I conclude that it would be appropriate to designate this land as an ADR, with the Green Belt boundary re-drawn to follow the line of Cherry Hill Road.

1.6.157 **Issue 29:** *(Heath Farm, Wythall)* This site is located south-west of Grimes Hill adjoining the traffic island junction of the A435 Alcester Road and Chapel Lane. Part of the proposed ADR is already developed with a mixture of uses that include a shop, restaurant, children's day nursery and offices/meat processing plant. The latter has planning permission for conversion to a motel. In addition, former poultry houses on the site have approval for conversion to B1, B2 and B8 uses. Other sections of the site are occupied by sports pitches, either existing or approved but not yet implemented. There is also a Committee resolution to authorise a golf driving range.

1.6.158 It is argued that this site is well placed to meet future development needs. The land is located adjacent to a settlement recommended by the BDLP Inspector as suitable for long term growth and has good communications, being close to the motorway network and with regular bus services to Wythall, Redditch and the conurbation. Moreover, the land is of limited agricultural quality, being a mixture of Grade 3 and land not in agricultural use.

1.6.159 This is an area that is still essentially rural in character. While there is some sporadic commercial development along the A435 and elsewhere in the locality, it is fairly typical of a main road leading out of a substantial settlement. The land only has strong defensible boundaries along its road frontages. Development of this land would, in my opinion, conflict with 2 important Green Belt purposes. Firstly, because of relatively weak boundaries to the south and west which follow

field lines and a public footpath, development would lead to unrestricted urban sprawl away from Wythall and, secondly, would cause an unacceptable degree of encroachment into the surrounding open countryside. Although there are existing buildings on the site, I saw that most of these are concentrated into the north-east corner, with the majority of the land remaining open and undeveloped. I agree with the Council that they do not dominate the site overall. Designation of an ADR in this location would, I believe, present a major inappropriate incursion into the Green Belt.

1.6.160 The Council has identified 2 ADRs in Wythall. I do not support one of those sites, at WYT14, but instead recommend that land at Bleakhouse Farm be substituted. However, both of the sites that I do support are closer to Wythall railway station and local facilities. While the objection site would have the benefit of facilitating mixed housing and commercial development, I regard the other sites as being generally more sustainable. They certainly relate better to the built form of Wythall. Most importantly, both would have a much lesser impact on the openness and visual integrity of the Green Belt.

1.6.161 Alternative suggestions have also been put forward. It is proposed either that a smaller ADR be designated, confined to the buildings in the north-east corner of the site, or that the land be shown as a Major Developed Site in the Green Belt, in accordance with Paragraph C3 of PPG2. I regard both 'solutions' as inappropriate. The former is open to many of the objections I have outlined in respect of the larger site area. As regards the latter, I do not consider this site to be sufficiently substantial to qualify for such special treatment. Paragraph C1 sets out examples of major developed sites in the Green Belt. They include factories, collieries, power stations, water and sewage treatment works, military establishments, civil airfields, hospitals, and research and education establishments. In my view, the objection site is in quite a different league and not dissimilar to many other former farm complexes found in the countryside generally.

1.6.162 **Issue 30:** *(Bromsgrove Cricket, Hockey and Tennis Club)* This objection has already been addressed in my consideration of a parallel objection (1277/1453) made in respect of Policy DS1 and Proposed Modification No DS/MOD5. See Paragraphs 1.3.84-1.3.90 of my report. I conclude that it would not be appropriate to identify the objection site as suitable for housing either in the short or medium terms, or as an ADR.

Recommendations

1.6.163 (a) That the Plan be modified in accordance with Proposed Modification DS/MOD12, subject to the following additional modifications:

Issue 1:

(ii) land south of Kidderminster Road, Hagley be designated as an ADR and excluded from the Green Belt.

(iii) the Proposals Map and Appendix 3A be modified accordingly.

Issue 3:

(former Brickworks site, Alvechurch) See recommendations at Paragraph 1.3.91.

Issue 4:

The following be added to Paragraph 8.19 of the explanatory text, after the words "….. Areas of Development Restraint (ADRs)":

> **"They represent sustainable locations for development whilst having regard to Green Belt objectives. The identification of such areas will reduce the likelihood of the need to redefine Green Belt boundaries before 2021."**

Issue 16:

(iii) land at Bleakhouse Farm, Wythall [shaded brown on G L Hearn Planning drawing J6915/1 dated May 2001, but excluding the 2 middle fields immediately north of the farm buildings] be designated as an ADR and excluded from the Green Belt.

(iv) the Proposals Map and Appendix 3A be modified accordingly.

Issue 20:

See recommendations at Paragraph 1.3.91.

Issue 24:

(iv) land at Church Road, Catshill be designated as an ADR.

(v) the Green Belt boundary be drawn as shown on Plan 3 accompanying the main hearing statement of Stansgate Planning Consultants (Docs O/DS8 – DS/MOD12/1019/1420/PGH/1 and O/DS8 – DS/MOD12/1020/1421/PGH/1).

(vi) the Proposals Map and Appendix 3A be modified accordingly.

Issue 28:

(iv) land at Kendal End Road, Barnt Green be designated as an ADR.

(v) the Green Belt boundary be redrawn to follow the line of Cherry Hill Road and Kendal End Road.

(vi) the Proposals Map and Appendix 3A be modified accordingly.

(b) That no further modifications be made to the Plan in respect of these objections *(Issues 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 21, 22, 23, 25, 26, 27, 29 and 30)*.

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1.7 Policy DS11 – Planning Obligations [Proposed Modification No DS/MOD15]

1106/1000 Worcestershire County Council
9/1004 Alvechurch Parish Council
33/1007 Wall James & Davies (various clients)

Key Issues

1.7.1 (1) Whether sufficient detail regarding methodology and financial arrangements has been included in the Policy and/or explanatory text.

(2) Whether specific reference should be made to seeking contributions towards traffic calming measures and educational facilities.

Inspector's Appraisal and Conclusions

1.7.2 **Issue 1:** The objector contends that insufficient information is provided concerning the justification for a Section 106 planning obligation and the methodological basis of the financial arrangements. Circular 1/97 Paragraph B.17 partly addresses this issue. It indicates that planning policies should not be unduly prescriptive and that those based on blanket formulations and which seek precise costs in advance will be unacceptable. Like the Council, it is my opinion that to introduce more detail into Policy DS11 would restrict the possibility of entering into negotiations with developers. I am satisfied that the Policy generally complies with government guidance. However, I consider it would be useful if the explanatory text included a reference to Circular 1/97 which contains

more information on the justification and test for the application of planning obligations.

1.7.3 **Issue 2:** I shall deal firstly with the concern that specific reference be made to traffic calming measures as a means to address the potential increase in road traffic from future residential development. I am satisfied that the objector's anxieties regarding such measures are adequately dealt with by Policy TR6 which requires developers to incorporate appropriate traffic calming measures in development proposals for residential areas. The Council is of the opinion that there is no justification to modify this Policy. I concur with that view.

1.7.5 Turning now to educational facilities, Policy DS11 sets out the circumstances in which S106 agreements and unilateral undertakings will be sought from developers. They include on or off-site facilities directly arising from the development and reasonably required as a result of the scheme. Examples are given of additional community, recreational or other infrastructure. There is, however, no specific mention of educational facilities.

1.7.6 I am informed that as a result of reductions in capital expenditure on schools and recent large-scale residential developments at Barnsley Hall and The Oakalls, many of Bromsgrove's schools are now at or close to capacity, with limited or no potential for expansion. The local education authority, Worcestershire County Council, argues that attempts to secure Section 106 funding for additional/enhanced educational facilities in Bromsgrove have been largely unsuccessful because appropriate wording was not included in the Local Plan. Instead, contributions have been channelled into other community needs such as social housing. Developers are, they say, now making representations to the authority because of difficulties in selling new housing due to a lack of places at certain schools, particularly in the south of the town.

1.7.7 Circular 1/97 outlines the government's policy on planning obligations. It makes it clear that development plans can, and should, set out the matters which must be addressed in order for development to proceed. Policies should not be unduly prescriptive but should address land use planning matters first and foremost. Educational provision is obviously one of those matters. While it could be argued that educational facilities are already covered by the broader wording 'community infrastructure' or 'other infrastructure', I can see merit in making a specific reference in Policy DS11. That would draw a developer's attention to what is a particularly important factor that could conceivably constrain development. I note the District Council's view that the change proposed to the Policy is modest and reasonable.

1.7.8 In pursuit of its case, Worcestershire County Council is also seeking an additional modification - to Policy S28 (New and Enhanced Community Facilities). I am, however, concerned that this is a new objection which was not made within the appropriate periods allowed for objection. Consequently, while the District

Council has expressed a preference for that Policy to be modified rather than Policy DS11, I do not think this would be appropriate. In any event, the scope of Policy S28 is rather narrower than that of DS11. The latter is included within the District Strategy section of the Plan making it more suitable, in my view, for expansion to cover educational facilities. I recommend accordingly.

Recommendations

1.7.9 **(a) That the Plan be modified in accordance with Proposed Modification DS/MOD15, subject to the following additional modifications:**

(i) The explanatory text at Paragraph 8.22 be expanded to make reference to the advice on planning obligations set out in Circular 1/97.

(ii) Sub-section a) of Policy DS11 be altered to read:

"on or off-site facilities directly arising from the development such as additional educational, community, recreational or other infrastructure which may reasonably be required as a result of the scheme; or"

(b) That no further modifications be made to the Plan in respect of these objections.

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1.8 Policy DS13 – Sustainable Development [Proposed Modification No DS/MOD16]

10/1004	Alvechurch Parish Council
1102/1391	Birmingham City Council
1196/1399	West Midlands Planning and Transportation Sub-Committee

Key Issues

1.8.1 (1) Whether reference should be made in the Policy to Village Design Statements.

(2) Whether the economic and social strands of sustainable development are adequately addressed in Policy DS13.

Inspector's Appraisal and Conclusions

1.8.2 **Issue 1**: Village Design Statements constitute supplementary planning guidance (SPG). They are intended, amongst other matters, to help developers appreciate local views and perceptions about specific areas. In line with PPG12, SPG does not form part of the Plan but represents a material consideration in the determination of a planning application.

1.8.3 Policy DS13 is an over-arching non-area-specific policy that deals with the very broad issue of sustainable development. I consider it would be inappropriate to single out Village Design Statements for specific mention in this Policy. However, I can see benefit from including reference to the existence of Village Design Statements elsewhere in the Plan. An appropriate place for such a reference would be in the relevant settlement chapters. As the Plan is intended to be read as a whole and repetition should be avoided, I conclude that no additional alteration should be made to this particular Policy or to its reasoned justification.

1.8.4 **Issue 2**: It is argued that Policy DS13 is inconsistent with national guidance, and potentially inflexible with regard to certain strategic issues, due to its concentration on environmental matters at the expense of other considerations. The District Council has sought to address this concern through Further Change 1 which would replace the words "All development" in the second sentence of the Policy with "Development, whether for economic or social purposes". However, it seems to me that the further qualification proposed by the Council adds little, if anything, to the substance of the Policy. By definition, all development would cover development for economic or social purposes. Moreover, no attempt has been made to expand the Policy criteria.

1.8.6 Paragraphs 4-7 of PPG1 recognise that the scope of 'sustainable development' encompasses both economic and social considerations, in addition to environmental matters. In contrast, Policy DS13 focuses almost exclusively on protection of the District's environmental assets. If it is the Council's intention that this Policy provides an holistic framework for planning decisions, which is what they claim, then I believe the Policy should also take into account the social and economic aspects of sustainable development. The alternative Policy wording suggested by one of the objectors addresses this concern and takes on board the wider sustainable development objectives contained in Paragraph 4.1 of PPG12.

1.8.7 I believe that those changes give the necessary degree of flexibility and satisfactorily deal with the objectors' specific concerns relating to the future provision of park and ride facilities in the District and the implications for future development of the A38 technology corridor.

1.8.8 I therefore recommend that the Policy should be further modified. I find the detailed wording suggested by Birmingham City Council to be appropriate.

Recommendations

1.8.9 (a) That Proposed Modification DS/MOD16 be not made.

(b) That Policy DS13 be modified to read:

"The District Council will take full account of the need for future development to be sustainable so that present demands do not compromise the ability of future generations to meet their own demands or enjoy a high quality environment. All development must reflect the need to safeguard and improve the quality of life of residents by:

- **maintaining high and stable levels of economic growth and employment**
- **ensuring social progress which recognises the needs of everyone**
- **conserving energy resources, and**
- **protecting the Plan area's essential character and environmental assets, including:**

  a) the general attractiveness and diversity of the landscape
  k) the open and undeveloped nature of the countryside
  l) the Green Belt
  m) areas of wildlife and ecological value
  n) the setting, form and character of settlements
  o) the quality of air and water resources
  p) buildings and areas of special townscape, historic and architectural interest
  q) sites of archaeological importance
  r) land of recreation and amenity value, and
  s) the best and most versatile agricultural land."

(c) That Paragraph 8.24 be modified to read:

"It is the District Council's intention that this local plan should reflect concern for the present and future quality of life of its residents. Defining broad sustainable development aims and criteria is essential for providing the direction and essential yardstick in later appraisals of development plan policies and proposals."

(f) That the Council includes references to Village Design Statements in the relevant settlement chapters of the Plan.

(g) That no further modifications be made to the Plan in respect of these objections.

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1.9 Policy DS14 – Enforcement [Proposed Modification No DS/MOD17]

988/1385 Stansgate Planning Consultants

Key Issue

1.9.1 Whether it is appropriate to include a policy relating to the enforcement of planning control.

Inspector's Appraisal and Conclusions

1.9.2 Policy DS14 indicates that enforcement action will be taken in appropriate circumstances against parties contravening planning legislation, including Local Plan policies.

1.9.3 The objector argues that the Council needs no specific policy to carry out its statutory duties, and that such a policy duplicates what is already laid down in legislation through S172 of the Town and Country Planning Act 1990.

1.9.4 I agree with the objector that there is no specific requirement for this kind of policy. However, Section 36(1) of the Act does give a local planning authority discretion to include within a local plan any policy that relates to the development and use of land in its area. Practice Advice Note No 6 (Enforcement of Planning Control), issued by the Royal Town Planning Institute, advises that "Authorities might include a policy relating to enforcement in their development plans. This would clarify their approach regarding enforcement and would help to prioritise enforcement problems. It would also demonstrate to Inspectors on appeal that enforcement was 'plan-led' and would provide a stronger case before the courts when seeking injunctions."

1.9.5 I believe it is perfectly proper and reasonable to include this policy. It signals the Council's intention to enforce against planning contraventions and therefore serves a valid and useful purpose. It does not, in my view, simply duplicate provisions in other legislative regimes.

1.9.6 I note the Council's commitment to producing and adopting a policy document on the enforcement of planning controls. The explanatory text at Paragraph 8.25 should in my opinion make it clear that this would form supplementary planning guidance. I recommend accordingly.

Recommendations

1.9.7 That the Plan be modified in accordance with Proposed Modification DS/MOD17, subject to the following additional modification:

Paragraph 8.25 to read:

"The District Council will publish a policy document on the enforcement of planning controls. It is intended that this document will be adopted by the Council as supplementary planning guidance and reviewed on a regular basis."

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2. HOUSING

2.2 Overview

2.2.1 This chapter of the report considers the relationship of Stoke Prior to Bromsgrove town. It examines the detailed wording and scope of policies relating to new dwellings within and outside the Green Belt, plot subdivision in urban areas, and the replacement, extension and change of use of dwellings in the Green Belt. It addresses various matters relating to affordable housing. I support the deletion of Policy S8A and recommend a number of further modifications to both policies and explanatory text.

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2.2 Policy S1 – Structure Plan Requirements [Proposed Modification No SET/MOD1]

1038/1387 Bellway Estates

Key Issue

2.2.2 Whether the definition of "in, or adjacent to, Bromsgrove town" should include Stoke Prior.

Inspector's Appraisal and Conclusions

2.2.3 The objector contends that the settlement of Stoke Prior has, inappropriately, been omitted from the definition of "in, or adjacent to, Bromsgrove town" in Paragraph 9.2 of the explanatory text. It is argued that Stoke Prior has close functional and physical links with Bromsgrove, both in terms of residential and employment areas and in relation to infrastructure, transport and service links.

2.2.4 I note that this Policy has been modified in accordance with the recommended wording of the BDLP Inspector. In Paragraphs 1.6.99–1.6.108 of my report I consider the nature and sustainability credentials of Stoke Prior in relation to a proposal for an ADR in that settlement. I conclude that Stoke Prior is close to, but not part of Bromsgrove town and that it should be treated as a separate settlement in policy terms. I further commented that the settlement has a more

rural feel to it than suburban locations such as Lickey End and Catshill. The wording of the Policy refers to the 'core area of Bromsgrove town plus the urban areas of Catshill, Lickey End and Marlbrook'. In light of the above comments and my recommendation that no safeguarded land be designated at Stoke Prior, I do not consider the settlement should be included in the definition of 'in, or adjacent to, Bromsgrove town'.

Recommendations

2.2.5 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD1.

(c) That no further modifications be made to the Plan in respect of this objection.

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2.3 Policy S7 – New Dwellings outside the Green Belt [Proposed Modification No SET/MOD6]

14/1007 Wall James & Davies (various clients)
1139/1394 Sport England

Key Issues

2.3.1 (1) Whether criterion b) is appropriate in the light of PPG3 advice.

(2) Whether specific reference should be made to playing fields/sports sites in criterion f).

Inspector's Appraisal and Conclusions

2.3.2 **Issue 1**: Criterion b) of Policy S7 indicates that a proposal should not involve 'tandem' development. This requirement is, I believe, unduly prescriptive and in conflict with more recent advice set out in PPG3 which aims to secure the most efficient use of land and achieve an increase in density. While I note the Council's concern regarding the possible impact of such development on the character of an area, I consider that adequate guidance is in place in respect of layout, scale and design through national planning policy - especially PPG1 and PPG3. I consider therefore that criterion b) should be deleted.

[Although not subject to a duly made objection, the Council should, for the sake of consistency, review a reference to 'tandem' development in Policy S8 and its supporting text.]

2.3.3 **Issue 2:** The objector argues that a presumption against the loss of sports sites and playing fields should be incorporated in criterion f). I agree with the Council that sufficient protection of playing fields/sports sites and open space of recreational and amenity value has been afforded through policies S32 and RAT4. To incorporate a further reference here would result in unnecessary repetition - particularly in the light of criterion i) which requires conformity with other Plan policies.

Recommendations

2.3.5 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD6, subject to the deletion of criterion c) from Policy S7.

(c) That no further modifications be made to the Plan in respect of these objections.

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2.4 Policy S8A – Plot Sub-Division in Urban Areas [Proposed Modification No SET/MOD7]

35/1009	Mason Richards
36/1010	Richard Harper Estate
37/1011	J Christopher Ashton
38/1012	Keith Sprason
1500/1013-FC	Barnt Green Parish Council
1503/1060-FC	Lickey and Blackwell Parish Council
341/1128	Hagley Parish Council
1501/1376-FC	Wythall Parish Council
977/1381	Billingham & Kite Ltd
34/1008	Antler Property Corporation plc
1502/1450-FC	Hunnington Parish Council
1504/1452-FC	Cofton Hackett Parish Council

Key Issue

2.4.1 Whether the Policy is appropriate in light of the guidance set out in PPG3.

Inspector's Appraisal and Conclusions

2.4.2 I firstly note the Council's intention to delete this Policy in line with Further Change 2. This has resulted in the conditional withdrawal of some objections. I secondly note the counter-objections received in relation to that proposed course of action.

2.4.3 A number of objectors have highlighted the importance of 'greening the urban environment' and 'developing a shared vision between the Local Planning Authority and the local community of the types of residential environments they wish to see'. These are some of the basic principles of PPG3. While I acknowledge these values, like the Council and the other objectors I am of the opinion that the Policy and its criteria, in its present form, is contrary to guidance in PPG3 with regard to achieving the most effective use of urban land and the avoidance of low density development. I therefore consider it appropriate to delete this Policy from the Plan in line with FC2. In light of this recommendation it is unnecessary for me to examine those objections concerned specifically with the appropriateness of the criteria and the wording of the Policy.

2.4.4 One objector has commented that there is a risk of the Plan becoming too prescriptive with regard to design criteria. Others have expressed a desire to retain this Policy to prevent inappropriate development of plots, particularly in Barnt Green and Wythall. The Council has indicated its intention at Local Plan Review stage to consider a more specific policy approach to moderating densities in selected parts of the District where particular protection is warranted. I suggest the Council heeds the objections raised at this Inquiry in the formulation of a potential replacement policy/policies.

Recommendation

2.4.5 (a) That Proposed Modification SET/MOD7 be not made.

(b) That no further modifications be made to the Plan in respect of these objections.

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2.5 Policy S9 – New Dwellings in the Green Belt [Proposed Modification No SET/MOD8]

16/1007 Wall James & Davies (various clients)
266/1110 Clent Parish Council

992/1385 Stansgate Planning Consultants

Key Issues

2.5.1 (1) Whether policy provision should be made for plot subdivision or housing on backland sites in the Green Belt.

(2) Whether the special circumstances set out in Policy S9 are necessary and appropriate.

(3) Whether additional categories should be included in Policy S9.

Inspector's Appraisal and Conclusions

2.5.2 **Issue 1:** The objector is seeking to replace Policy S9 (New Dwellings in the Green Belt) with a new policy that provides for plot subdivision or housing on backland sites in the Green Belt, subject to criteria to protect the amenities of the occupiers of adjoining dwellings and the character of the area. A third criterion would relate to the possible withdrawal of 'permitted development' rights.

2.5.3 I cannot support this proposal. Policy S9 as drafted seeks to safeguard the Green Belt from insidious piecemeal residential development, by confining acceptable uses to a minimum. The 4 permissible categories relate to dwellings required for forestry or agricultural purposes, the re-use of a rural building, limited affordable housing for local communities, and limited infill within the present boundary of those settlements where a 'village envelope' has been defined. Such categories accord with the advice set out in PPG2. I find no support in PPG3 for the more relaxed approach advocated by the objector in respect of either plot subdivision or backland development.

2.5.4 **Issue 2:** The objection lodged by Clent Parish Council has already been substantially addressed in my consideration of a related objection (265/1110) made in respect of Policy DS5 and Proposed Modification No DS/MOD9. See Paragraphs 1.5.2-1.5.10. of my report. I conclude that the special circumstances listed in Policy S9 where housing development can take place in the Green Belt are all necessary and appropriate to accord with national planning policy guidance.

2.5.5 **Issue 3:** The objector argues that for the sake of completeness and clarity 2 further categories of residential development should be added to those permissible in the Green Belt. These are 'replacement dwellings' (referred to in Policy S12) and 'the subdivision of existing dwellings' (covered by Policy S13).

2.5.7 Given the references in Policies S12 and S13 to Green Belt, I agree with the objector that one would expect to find their inclusion in the special circumstances listed in Policy S9. While it is clearly impracticable to cross-reference all related

matters, and the Plan must be read as a whole, this is confusing for Plan users. The Council explains that replacement dwellings do not constitute new residential development because there is no net gain in the number of units. It accepts that subdivision can lead to additional dwellings but this is regarded as somewhat different because the buildings are already in existence. The net gain does however, in the Council's view, merit a cross-reference to Policy S13 in the supporting text.

2.5.8 I find these explanations, although ingenious, rather unconvincing. I note, for instance, that the replacement of existing dwellings comes under the heading 'New buildings' in Paragraph 3.4 of PPG2. I conclude that the 2 extra categories identified by the objector should be added to Policy S9 and the supporting text amended accordingly.

Recommendations

2.5.9 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD8, subject to the following additional modifications:

(j) Further categories be included in Policy S9, as follows:

"e) where it concerns a replacement dwelling in accordance with Policy S12;
g) where it concerns the sub-division of an existing dwelling in accordance with Policy S13."

(ii) Substitution of the following text for the 3rd and 4th sentences of Paragraph 9.14:

"The District Council seeks, by this policy, to confirm its intention to safeguard all Green Belt areas from continuing pressure for piecemeal residential development and to confine acceptable uses to a minimum allowing only for certain specialised uses, limited infill, replacement dwellings and the sub-division of existing dwellings in acceptable locations."

(b) That no further modifications be made to the Plan in respect of these objections.

****

2.6 Policy S11 – Extensions to Dwellings in the Green Belt [Proposed Modification No SET/MOD9]

18/1007 Wall James & Davies (various clients)

Key Issue

2.6.1 Whether Policies S11 and S10 should be combined.

Inspector's Appraisal and Conclusions

2.6.3 The objector contends that an amalgamation of Policies S11 and S10 would avoid unnecessary duplication and that the criteria of the combined Policy should be altered in part to omit those matters more appropriate for a design guide.

2.6.4 With regard to the combination of Policies S11 and S10, the previous Inspector was of the opinion that Green Belt development should be made subject to a separate Policy. I take a similar view, bearing in mind that a different, somewhat stricter planning control regime applies to extensions in the Green Belt compared with elsewhere.

2.6.5 As regards the principles set out in Policy S10, these are admittedly rather detailed. However, they provide clear and useful policy guidance and I see no compelling reason why they should be relegated to the Council's Residential Design Guide.

Recommendations

2.6.6 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD9.

(b) That no further modifications be made to the Plan in respect of this objection.

****

2.7 Policy S12 – Replacement of Dwellings in the Green Belt [Proposed Modification No SET/MOD10]

19/1007 Wall James & Davies (various clients)
993/1385 Stansgate Planning Consultants

Key Issues

2.7.1 (1) Whether the scope of Policy S12 should be extended to relate also to land outside the Green Belt.

(2) Whether replacement dwellings in the Green Belt should be restricted to the site of an existing building.

Inspector's Appraisal and Conclusions

2.7.2 **Issue 1:** I accept that it is difficult, if not impossible, for a Local Plan to cover all development possibilities. Clearly, the Council has been selective in drawing up policies designed to address the most problematical situations. While it has decided to include a specific policy relating to replacement dwellings in the Green Belt, this coverage is not extended to replacement dwellings elsewhere. In those situations any proposal would have to be considered against other, more general, Plan policies. This means assessing the scale of a development in terms of its impact on the character of an area rather than the size of the original dwelling. This is, in my view, a legitimate approach and I see no compelling need to broaden the scope of Policy S12.

2.7.3 **Issue 2:** Both objectors argue that the Policy is too restrictive in requiring a replacement dwelling to be constructed on the site of an existing building. They point out that this could prove more harmful, in landscape terms for example, than building on an alternative area within the curtilage. There is, they say, nothing in PPG2 to support such a narrow approach.

2.8.4 The Council accepts that if relocation would reduce the harm to the openness of the Green Belt it might be reasonable to allow a replacement on that basis. But they are reluctant to add either of the specific criteria suggested by the objectors because that would potentially permit a replacement on any part of the site without necessarily requiring justification for so doing.

2.8.5 I agree with the Council that allowing a replacement dwelling anywhere within the curtilage would serve to undermine the general premise, and starting point, that a replacement dwelling should be similar in form and on the same site as the original. Far better in my view to apply the Policy with a degree of flexibility, allowing relocation on a site by site basis only where improvements can be demonstrated.

Recommendations

2.8.6 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD10.

(b) That no further modifications be made to the Plan in respect of these objections.

****

2.9 Policy S13A – Changes of Use of Dwellings in the Green Belt [Proposed Modification No SET/MOD11]

1140/1394 Sport England

2.8.1 **Key Issue**

Whether the Policy should highlight that change of use to accepted complementary uses, such as sport, will be permitted.

Inspector's Appraisal and Conclusions

2.8.2 This is a general policy which does not refer to any particular uses that might be considered acceptable. Like the Council, I am aware of the danger that a list of such uses might become definitive rather than indicative. Furthermore, I am satisfied that adequate reference is provided in the explanatory text whereby appropriate and practical proposals that retain dwellings and do not prejudice the openness of the Green Belt will be considered sympathetically.

Recommendations

2.8.3 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD11.

(b) That no further modifications be made to the Plan in respect of this objection.

****

2.9 Policy S15 – Affordable Housing in Urban Areas [Proposed Modification No SET/MOD13]

1035/1386 House Builders' Federation

Key Issue

2.9.1 Whether (a) the numerical target for affordable housing provision, and (b) the percentage requirement for private sector dwellings on major sites to fall within an affordable housing category (specified at Paragraphs 9.23-9.25 of the supporting text), are appropriate.

Inspector's Appraisal and Conclusions

2.9.2 There is no dispute that there is a need for affordable housing in Bromsgrove District. Moreover, the HBF accepts the terms of Policy S15 which will enable affordable housing to be negotiated on major sites for residential development.

2.9.3 The HBF concerns relate to 2 aspects of the explanatory text. Firstly, the Council has carried out an analysis of its local authority housing waiting list, supported by the 1991 Census and other national and county data, to define a numerical provision of affordable housing. It says that 1141 affordable dwellings should be provided between 1997 and 2001. However, this time period has now expired and the requirement is obsolete. Although the Council intends to update these figures, I agree with the objector that this would not be appropriate because it would project into a time period beyond this Local Plan.

2.9.4 Secondly, the Council has established a requirement for 32% of dwellings on major sites to be affordable - 20% rented and 12% shared equity or low cost. The methodology used is based upon the 1991 Census, the New Earnings Survey 1996 and a local survey of private sector house prices 1996-1997. These figures reflect the tenure split of households in Bromsgrove District, with 20% residing in local authority or housing association accommodation. However, it seems to me that the findings have no direct link with affordable housing need. They do not, for instance, identify households that are either in unsatisfactory accommodation or are seeking to move in the near future. For those percentages to be meaningful they need to be supported by a Housing Needs Survey. Nor do I consider the 12% figure for households who might benefit from subsidy to purchase to be sufficiently robust. This data should be reinforced by evidence of the number of households seeking to buy into the housing market.

2.9.5 These reservations lead me to conclude that little reliance can be placed on the percentage requirements set out in the explanatory text. The Council acknowledges the need to update its work and admits that its current Housing Needs Assessment has been used less strenuously in recent discussions with developers. This is tantamount to an admission of limited confidence in those figures. I am told that increasingly they are employed by the Council as a starting point only in negotiations with developers - in effect, a first bid for an element of affordable housing.

2.9.6 Circular 6/98 indicates that affordable housing policies should be based on clear assessments of local need that are both rigorous, so that they can withstand detailed scrutiny, and kept up-to-date during the plan period. Neither of those requirements are met here. The Council argues that to delete the supporting text, as suggested, would leave no indication of the amount of affordable housing to be sought and no basis for applying the Policy - in effect, creating a policy vacuum. I recognise this difficulty. Indeed, Paragraph 9b) of Circular 6/98 makes it clear that local planning authorities should indicate in the Plan how many affordable homes need to be provided throughout the plan area and set indicative targets for specific suitable sites (expressed either as numbers of homes or a percentage of the homes on the site). The BDLP Inspector's recommendation was along similar lines.

2.9.7 I am told that a new District-wide Housing Needs Survey has been commissioned by the Council. It is currently being prepared by an independent specialist housing research company. This will provide the Council with an opportunity to define a more robust affordable housing requirement. Such local information will, the Council says, be used to inform a new Policy to be included in the Local Plan Review. However, that survey is not before me and I cannot anticipate the outcome.

2.9.8 What action is taken in relation to the findings of that new survey in the interim period is a matter for further consideration. It seems to me that in the context of the BDLPPM such information might best be treated as supplementary planning guidance. That would help inform all parties and provide a basis for negotiation. My response, strictly on the evidence presented to the BDLPPM inquiry, is that it is preferable to delete the numeric and percentage targets from Paragraphs 9.23 and 9.25. Far better, I feel, to negotiate with developers on an open basis than to place reliance on figures and percentages which are not only manifestly out-of-date but derived from methodologies that are insufficiently robust.

2.9.9 I conclude that Paragraphs 9.23-9.25 of the explanatory text should be deleted. In their place a new paragraph should be inserted outlining the current site/development size thresholds above which the local planning authority will negotiate with developers to secure an element of affordable housing. I do not agree with the Council that this is unnecessary. Apart from a reference to 'major housing sites' in the Policy itself, such information is not currently set out in the Plan.

Recommendations

2.9.10 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD13, subject to the following additional modification:

Paragraphs 9.23-9.25 of the explanatory text be deleted and a replacement paragraph substituted setting out the current site/development size

thresholds above which the Council will seek to negotiate with developers for an element of affordable housing.

(b) That consideration be given to adopting the new Housing Needs Survey as supplementary planning guidance.

(c) That no further modifications be made to the Plan in respect of this objection.

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3. SHOPPING

3.2 Overview

3.2.1 The criteria of Policy S21 are examined. I recommend further modifications in respect of both the policy criteria and the explanatory text.

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3.2 Policy S21 – Out-of-Town Shopping [Proposed Modification No SET/MOD19]

983/1383 Wm Morrison Supermarkets plc
1141/1394 Sport England

Key Issues

3.2.1 (1) Whether an additional criterion should be the suitability and viability of the site for the proposed use and whether it is likely to become available within a reasonable period of time.

(2) Whether criterion c) adequately reflects the advice in PPG6 Paragraph 3.23.

(3) Whether there should be a recognition of the impact of such development on existing or potential sports sites and facilities.

Inspector's Appraisal and Conclusions

3.2.2 **Issue 1**: The first part of Policy S21 sets out the 'sequential approach' to selecting sites for new retail development outlined in PPG6. The second part establishes 5 criteria against which proposals for major new retail facilities for food and non-food shopping will be considered. The objector argues that a further criterion should be added based on a site's suitability, viability for the proposed use and availability.

3.2.3 I agree that these are relevant considerations, reflecting the advice set out in Paragraph 1.12 of PPG6, and should be incorporated in the Policy. However, in

that same Paragraph, the Government recognises that the sequential approach requires flexibility and realism from local planning authorities, developers and retailers alike. While local planning authorities are asked to be sensitive to the needs of retailers and other town centre businesses, developers and retailers for their part need to be more flexible about the format, design and scale of a development, and the amount of car parking, tailoring these to fit local circumstances. These important provisos should, in my opinion, be incorporated in the reasoned justification of the Policy.

3.2.4 **Issue 2**: I can appreciate the Council's concern regarding the balance that needs to be struck between land release and protecting the Green Belt. This has led the Council to seek to protect through criterion c) the supply (or quantity) of housing and employment land, rather than the range and quality of potential sites. However, I consider the wording suggested by the objector, with a few minor amendments, more closely reflects the guidance given in PPG6 and in WCSP Policy D.33.

3.2.5 **Issue 3**: Paragraph 3.23 of PPG6 indicates that land designated for playing fields and open space should not be used for retail development, unless replacement provision of equal recreation and amenity value is made. Such facilities are already afforded a considerable measure of protection through other Plan Policies - namely, S32 and RAT4. Given that the Plan should be read as a whole, I do not consider it necessary to introduce a further criterion of this nature. To do so would result in inappropriate duplication.

Recommendations

3.2.7 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD19, subject to the following further modifications:

(iv) A new criterion be added to Policy S21:

"f) the suitability and viability of the site for the proposed use, and whether it is likely to become available within a reasonable period of time."

(v) The explanatory text to Policy S21 be altered to indicate that:

"Developers and retailers should be flexible about the format, design and scale of a development, and the amount of car parking - which should be tailored to meet local circumstances."

(vi) Criterion c) of Policy S21 be altered to indicate that:

"retail uses will not normally be permitted on land allocated for industry, employment and housing where this can be shown to have

the effect of limiting the range and quality of sites that would be available."

(b) That no further modifications be made to the Plan in respect of these objections.

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5. CONSERVATION

4.3 Overview

4.3.1 In this chapter I examine the role of Village Design Statements. I look at the adequacy of policies intended to protect buildings of merit, conservation areas, and historic parks and gardens. While generally supporting the Council's Proposed Modifications, I recommend further alterations in respect of Policy S48 and its supporting text.

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4.4 Policy S35A – Development in Conservation Areas [Proposed Modification No SET/MOD28]

40/1004 Alvechurch Parish Council

Key Issue

4.4.1 Whether reference should be made to the existence of Village Design Statements, especially in relation to criterion b) concerning design.

Inspector's Appraisal and Conclusions

4.4.2 Whether the Plan should contain references to Village Design Statements (VDS) has already been considered in response to an objection to Policy DS13. In summary, I suggested that while specific reference to VDS in the Policy and explanatory text was not required, mention of their existence should be incorporated in the introduction to each settlement.

4.4.3 Policy S35A deals specifically with Conservation Areas. In contrast, Village Design Statements cover a number of policy designations and areas. I do not consider it appropriate to single out Village Design Statements for specific mention in relation to Conservation Areas.

Recommendations

4.4.4 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD28.

(b) That no further modifications be made to the Plan in respect of this objection.

****

4.3 Policy S38 – Protection of Buildings of Merit [Proposed Modification No SET/MOD30]

421/1157 P W King

Key Issue

4.3.2 Whether the preservation of historic, unlisted buildings that contribute to the character of an area have been adequately considered.

Inspector's Appraisal and Conclusions

4.3.3 I note the comments of the BDLP Inspector whereby he stated that "change 2.40 clarifies the Council's approach to the protection of listed and unlisted buildings of architectural or historical interest and how the Council will exercise its powers to protect features of the built environment". I am satisfied that the objector's concerns are adequately addressed through the Council's proposed modification of Policy S38. I further note that the Council has stated that it will monitor buildings of quality which are not yet afforded protection and where they come under threat they will normally seek specialist advice prior to taking further action.

Recommendations

4.3.4 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD30.

(b) That no further modifications be made to the Plan in respect of this objection.

****

4.4 Policy S44 – Reinstatement of Features in Conservation Areas [Proposed Modification No SET/MOD35]

42/1001 Dodford with Grafton Parish Council

Key Issue

4.4.2 Whether the Policy should make reference to natural calming features of rural Conservation Areas.

Inspector's Appraisal and Conclusions

4.4.3 The objector points out that the Policy does not cover valued features such as hedgerows, grass verges, trees, narrow roads and bends which are important elements in defining the character of many Conservation Areas. However, I accept the Council's argument that the intended scope of this Policy is limited to features of the 'built' environment only and that other Policies, such as S35A, are concerned with the promotion and improvement of the general environmental quality of Conservation Areas. I am of the opinion that more appropriate, measures exist to provide protection for the factors listed by the objector (e.g. TPOs and Hedgerow Regulations). I conclude therefore that this Policy does not require any alteration.

Recommendations

4.4.4 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD35.

(b) That no further modifications be made to the Plan in respect of this objection.

****

4.5 Policy S48 – Historic Parks and Gardens [Proposed Modification No SET/MOD39]

1257/1053 Mr J Pashley

Key Issues

4.5.1 (1) Whether the final sentence of Policy S48 should be further modified to include 'and/or parks '.

(2) Whether the words 'historic' and 'parks' should be given their normal, wider dictionary definition.

(3) Whether a further policy criterion should be added - 'views from places of public resort'.

Inspector's Appraisal and Conclusions

4.5.2 **Issue 1:** I agree with the objector that, in the interests of clarity and consistency, the penultimate line of Policy S48 should refer also to parks as well as gardens. This was accepted by the Council at the inquiry.

4.5.3 **Issue 2:** This Policy is intended to apply to those parks and gardens of special historic interest listed in the register maintained by English Heritage, together with parks and gardens of regional importance. This is sensible. I see no compelling planning reason why it should apply to all parks in the District. However, the explanatory text is not, in my opinion, as clear as it could be. Moreover, I feel it would be beneficial to users of the Plan if those parks and gardens of regional importance were identified in the supporting text. I recommend accordingly.

4.5.4 **Issue 3:** I see no need for this further modification. Views into or out of the park or garden are already addressed under criterion a).

Recommendations

4.5.6 (a) That the Plan be modified in accordance with Proposed Modification SET/MOD39, subject to the following additional modifications:

(iii) The final sentence of Policy S48 be further modified to read:

"The District Council will liaise with English Heritage and the Garden History Society in considering applications either within the boundaries of such parks and gardens or in proximity to them where important views from the park and/or garden would be materially affected."

(iv) The explanatory text at Paragraph 9.58 be further modified to read:

"Historic parks and gardens comprise those listed in the register of parks and gardens of special historic interest maintained by English Heritage, and other parks and gardens of regional importance in the District. These are: Hagley Park (Grade I), Hewell Park (Grade II*) ……" *[add those parks and gardens of regional importance]*

(b) That no further modifications be made to the Plan in respect of this objection.

****

5. LANDSCAPE

5.1 Overview

5.1.1 In this short section of the report I consider the adequacy of the criteria laid out in Policy C4 for assessing the impact of development on the landscape. I support the Council's policy approach and recommend no further modifications.

****

5.2 Policy C4 – Criteria for Assessing Development Proposals [Proposed Modification No CTRY/MOD7]

1259/1053 Mr J Pashley

Key Issue

5.2.1 Whether a fourth category should be added to strengthen Policy C4 - that is, 'views from parks, including historic parks'.

Inspector's Appraisal and Conclusions

5.2.3 Policy C4 aims to minimise the impact of development on the landscape, particularly landscapes of high quality designated in the BDLPPM as Landscape Protection Areas. Three categories of physical feature are singled out for special attention - prominent slopes or major ridge lines; woodlands and hedgerows; and water features. It would not be appropriate in my opinion to add "views from parks", as sought by the objector. Not only are they not landscape features as such but protection is already afforded to views into and out of historic parks and gardens under Policy S48.

Recommendations

5.2.4 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD7.

(c) That no further modifications be made to the Plan in respect of this objection.

****

6. NATURE CONSERVATION

6.1 Overview

6.1.2 Having considered the scope for restricting development adjacent to sites of nature conservation significance I conclude that it would be inappropriate to adopt a rigid distance formula.

****

6.2 Policy C10A – Development Affecting Other Wildlife Sites [Proposed Modification No CTRY/MOD13]

1260/1053 Mr J Pashley

Key Issue

6.2.1 Whether the Policy should be augmented to restrict development immediately adjacent to 'other wildlife sites'.

Inspector's Appraisal and Conclusions

6.2.2 The objector wishes to see Policy C10A further modified so that "residential development granted adjacent to woodlands, ponds, lakes and streams, marshland and wetlands will only be granted if any structure is at least 30 metres away from the feature". In support of that objection photographs have been supplied of residential development that has taken place in Twatling Road, Barnt Green. These show screen fencing erected on the boundary with woodland designated both as a Landscape Protection Area and an Area of Great Landscape Value, and buildings constructed very close to trees. In some cases, overhanging branches have been cut back to the boundary.

6.2.3 As a result of objections made to the deposit draft of the BDLP the Council introduced a hierarchical approach covering sites of differing nature conservation importance. Policies C9, C10 and C10A now afford varied degrees of protection according to status. Policy C10A was reviewed by the BDLP Inspector who concluded that it adequately formulated the much less restrictive general policy approach appropriate to 'features of nature conservation importance' and that

Paragraph 10.16 of the explanatory text gave a suitable explanation of the Council's preferred hierarchy. I concur with those views.

6.2.4 I can appreciate the concerns of the objector about the development permitted in Twatling Road but I cannot endorse a blanket 30m separation zone. Not only is this 'rule of thumb' not supported by any scientific justification but it would introduce an inappropriate degree of inflexibility into the Policy that pays no regard to individual circumstances. As the Council points out, there could be instances where residential development in excess of that distance would have a far greater impact on a wildlife site than development elsewhere which conforms to that requirement. It is my view that Policy C10A, as drafted, provides the Council with the necessary policy backing to adequately control future development and to protect nature conservation interests. I note that the Policy has had input from, and is strongly supported by, both Worcestershire Wildlife Trust and English Nature. It is up to the Council to apply the Policy in a proper manner, supporting its decisions with appropriate planning conditions and other controls such as Tree Preservation Orders.

Recommendations

6.2.5 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD13.

(b) That no further modifications be made to the Plan in respect of this objection.

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7. WOODLANDS

7.1 Overview

7.1.1 I find it would be unduly prescriptive to adopt a policy approach that precludes development within a specified distance of existing woodland. The Policy as drafted allows a range of management practices to be pursued.

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7.2 Policy C18 – Retention of Existing Woodland [Proposed Modification No CTRY/MOD18]

1261/1053 Mr J Pashley
403/1157 P W King

Key Issues

7.2.1 (1) Whether the Policy should be augmented to preclude the erection of houses within 30 metres of existing woodland.

(2) Whether the Policy takes adequate account of traditional methods of woodland management and should provide for the restoration of ancient woodland.

Inspector's Appraisal and Conclusions

7.2.2 **Issue 1:** The objection made on behalf of Mr Pashley is closely related to an objection made in respect of Policy C10A (Development Affecting Other Wildlife Sites). Both objections derive from concerns expressed about residential development permitted at Twatling Road, Barnt Green in close proximity to Lickey Woods, and to the Council's proposal for an ADR in that locality.

7.2.3 The objector proposes that the following wording be added to the end of Policy C18: "If planning permission is to be granted adjacent to existing woodland for houses then a gap of 30 metres between the woodland and any structure must be maintained. The structures at the 30 metre gap must not exceed two storeys."

7.2.4 For reasons that I have already elaborated in response to objection 1260/1053, I cannot support this approach. In summary, I find the proposed specification of a 30m gap, and a 2-storey limitation at that distance, to be unduly prescriptive. They would not allow for individual circumstances to be addressed. Moreover, such restrictions are not supported by any scientific evidence. I note that in response to earlier objections the BDLP Inspector recommended a strengthening of the Policy to make it clear that the principles outlined will be taken into account in considering development projects. This the Council has done. The amended Policy has had input from, and is supported by, both Worcestershire Wildlife Trust and English Nature. I see no need for further modifications of the kind proposed by the objector.

7.2.5 **Issue 2:** Through this Policy the Council is seeking to retain and enhance existing woodland, to promote woodland and countryside management, and to secure additional tree planting in order to meet multiple objectives. Those objectives include timber production, recreational use and creation of wildlife habitats. Policy C18 does not attempt to prescribe how woodland should be managed. In particular, it does not exclude traditional methods like coppicing/natural regeneration. The Council acknowledges, as I do, that this is a matter for local landowners and those with special knowledge and expertise such as the Forestry Commission, English Nature and Worcestershire Wildlife Trust.

7.2.6 Criticism has also been made that Policy C18 does not provide for the restoration of ancient woodland where this has been previously converted into, for example, plantations. It seems to me though that once again this is a detailed management issue beyond the scope of a general policy of this type. Whether alien trees should be removed followed by natural regeneration in order to replicate the character of ancient woodland is essentially a matter for the landowner, in consultation with others having a legitimate interest.

Recommendations

7.2.8 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD18.

(b) That no further modifications be made to the Plan in respect of these objections.

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8. AGRICULTURE

8.1 Overview

8.1.1 I examine detailed criticisms made in respect of various policies. While generally supporting the Council's Proposed Modifications, I recommend further changes to Policy C23 and its supporting text to more closely accord with Circular advice on planning obligations and planning conditions. I suggest minor changes to other Policies.

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8.2 Policy C21 – New Agricultural Dwellings [Proposed Modification No CTRY/MOD20]

20/1007 Wall James & Davies (various clients)

Key Issue

8.2.1 Whether the Policy adequately reflects guidance set out in PPG7 Annex I.

Inspector's Appraisal and Conclusions

8.2.2 I note that the Council has followed the BDLP Inspector's recommendation on a similar matter and incorporated a reference in the supporting text to information contained in PPG7 - referring Plan users to relevant factors set out in Annex I. I am satisfied that the Policy does not contravene national planning policy guidance. It is in my view unnecessary and undesirable to further complicate the Policy or the explanatory text.

Recommendations

8.2.3 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD20.

(b) That no further modifications be made to the Plan in respect of this objection.

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8.3 Policy C23 – Additional Dwelling Units on Farms [Proposed Modification No CTRY/MOD21]

22/1007 Wall James & Davies (various clients)

Key Issue

8.3.1 Whether the Policy is appropriate and practicable.

Inspector's Appraisal and Conclusion

8.3.2 Policy C21 provides for a new agricultural dwelling to be made subject to an occupancy condition. Policy C23 extends this approach to any existing dwelling on the unit and indicates that the Council may, in appropriate circumstances, require an applicant to enter into an agreement under Section 106 of the Town and Country Planning Act 1990.

8.3.3 These provisions reflect, in large measure, the detailed recommendations made by the BDLP Inspector and, broadly, the advice set out in PPG7. Paragraph I19 of Annex I of PPG7 states: "When granting planning permission for a new agricultural dwelling, local planning authorities should be aware of the scope for imposing an occupancy condition not only on the dwelling itself but also on any existing dwellings on the unit which are under the control of the applicant, do not have occupancy conditions and need at the time of the application to be used in connection with the farm. This should help to protect the countryside against the risk of pressure for new houses……. In appropriate circumstances, authorities may use planning obligations to tie a farmhouse to adjacent farm buildings or to the agricultural land of the unit, to prevent them being sold separately without further application to the authority."

8.3.4 The detailed wording of Policy C23 is, in my view, deficient in 2 areas. Firstly, it indicates that the Council may 'require' the applicant to enter into a S106 agreement. An agreement is, by definition, a voluntary action and can only be 'sought'. This is made clear in Circular 1/97 (Planning Obligations). It was acknowledged by the previous Inspector who recommended that the word 'request' be substituted. Secondly, as drafted, the S106 provision appears to duplicate the requirements of a planning condition. Paragraph B20 of Annex B to

Circular 1/97 states that: "The terms of conditions imposed on a planning permission should not be re-stated in a planning obligation…..Such obligations entail unnecessary duplication and could frustrate a developer's right of appeal." And: "…if there is a choice between imposing conditions and entering into a planning obligation, the imposition of a condition which satisfies the policy tests of DoE Circular 11/95 is preferable…" To address these matters, I consider that Policy C23 should be rewritten to more closely follow the policy guidance of PPG7. I recommend accordingly.

8.3.5 The objector criticises Policy C23 on the grounds that it does not set out the 'appropriate circumstances' for seeking a S106 planning obligation and that such provisions are impractical. However, it would be impossible to set out all of the varied factors that must be taken into account in any particular case. Paragraph B17 of Annex B of Circular 1/97 indicates in respect of Development Plan policies: "…since planning obligations should be directly related to individual proposals if they are to be given any weight, it is not acceptable to set out precise requirements or to impose rigid formulae." Moreover, the very same words 'in appropriate circumstances' are used in Paragraph I19 of PPG7. As regards the practicality and legality of any planning obligation, that will depend upon its wording and precise requirements.

Recommendations

8.3.6 (a) That Proposed Modification CTRY/MOD21 be not made.

(d) That Policy C23 and Paragraph 10.29 be redrafted, as follows:

C23

"Where planning permission is granted for the construction of an additional dwelling unit on an agricultural holding, the District Council will consider imposing an occupancy condition on existing dwellings on the unit which are under the control of the applicant, do not have occupancy conditions and need at the time of the application to be used in connection with the farm. In appropriate circumstances, an agreement under Section 106 of the Town and Country Planning Act 1990 may be sought to tie a farmhouse to adjacent farm buildings or to the agricultural land of the unit."

Paragraph 10.29

"The District Council is entrusted with safeguarding the rural environment, particularly in view of its Green Belt designation. Where dwellings are required in support of agricultural activities the District Council will expect to see full justification of need and will consider imposing occupancy conditions on existing dwellings, as well

as the new dwelling. A legal agreement may be sought to maintain the existing range of dwellings for agriculture to prevent them being sold separately without further application.

(e) That no further modifications be made to the Plan in respect of this objection.

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8.4 Policy C24 – Removal of Occupancy Conditions [Proposed Modification No CTRY/MOD22]

23/1007 Wall James & Davies (various clients)

Key Issues

8.4.1 (1) Whether the Policy accurately reflects the guidance set out in PPG7 Annex I.

(2) Whether the phrase 'wider agricultural needs of the area' requires clarification.

Inspector's Appraisal and Conclusions

8.4.2 **Issue 1**: I support the BDLP Inspector in his conclusion that the Policy as currently worded makes clear the Council's position on agricultural occupancy conditions. I am satisfied that the Policy is consistent with PPG7 Annex I.

8.4.3 **Issue 2**: The objector has questioned the potentially ambiguous nature of the expressions 'wider agricultural needs' and 'the area', used in the Policy. The supporting text refers to the 'need of the agricultural community in the locality' and PPG7 (Paragraph I21) states that "it is the need for a dwelling for someone solely, mainly or last working in agriculture in an *area* as a whole (sic)". I acknowledge that, in this instance, the phrase 'wider agricultural needs of the area' could be open to interpretation.

8.4.5 The phrase 'agricultural needs of the area' closely reflects the wording of PPG7. However, I would recommend that the Council amends the explanatory text to interpret 'area' and 'locality' in terms more geographically relevant to Bromsgrove District to clarify the basis of application of this Policy.

8.4.6 It seems to me that the presence of the word 'wider' in the Policy is more problematic. Its inclusion does not add anything of value to the intention of the Policy and indeed may create confusion. I conclude that the word 'wider' is unnecessary and should be omitted.

Recommendations

8.4.7 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD22, subject to the following additional modification:

The word "wider" be deleted from the Policy to avoid ambiguity and the explanatory text be clarified with regard to the definition of 'area' and 'locality'.

(b) That no further modifications be made to the Plan in respect of this objection.

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8.5 Policy C27 – Re-Use of Existing Rural Buildings [Proposed Modification No CTRY/MOD23]

404/1157 P W King

Key Issue

8.5.1 Whether Policy C27 should allow for the sympathetic re-use of derelict buildings (including listed buildings) which have ceased to have any current use, subject to preservation of their historic character.

Inspector's Appraisal and Conclusion

8.5.2 Looking firstly at listed buildings, Policy S39 provides for changes of use if it can be demonstrated that an alternative use would ensure retention of the building. In those circumstances, the advantage of maintaining a listed building in active use would be weighed against any impact on its special architectural or historic interest. As the Council has indicated, enabling development might be considered as an exception to the normal presumption against inappropriate development in the Green Belt - so long as a convincing case can be made by the applicant and, in certain appropriate circumstances, a legal agreement is entered into.

8.5.3 If a building has considerable architectural or historic value but is not listed, then it would be considered under Policy S38 (Protection of Buildings of Merit). In the event that a building becomes derelict beyond the scope of that Policy then any application to rebuild would be judged on planning merit.

8.5.4 Beyond those provisions, Policy C27 incorporates criteria c) and d). These allow the re-use of buildings of permanent and substantial construction that are capable of conversion without major works or complete reconstruction, subject to the form, bulk and general design of the conversion scheme being in keeping with its surroundings and respecting local building styles and materials. Such criteria are consistent with the advice on the re-use and adaptation of rural buildings set out in Paragraphs 3.14-3.17 and Annex G of PPG7.

8.5.5 When taken in conjunction with other Plan policies, I believe that Policy C27 makes adequate provision for the re-use and conversion of rural buildings. I see no compelling reason to make further, more general, allowance to cover derelict structures/accommodation.

Recommendations

8.5.6 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD23 (relating to Policy C27).

(b) That no further modifications be made to the Plan in respect of this objection.

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8.6 Policy C27B – Residential and Commercial Re-Use of a Rural Building [Proposed Modification No CTRY/MOD23]

24/1007 Wall James & Davies (various clients)

Key Issue

8.6.2 Whether the test of criterion b) is too restrictive.

Inspector's Appraisal and Conclusion

8.6.3 This objection does not relate to Policy C27B. It refers instead to criterion b) of Policy C27 (Re-Use of Existing Rural Buildings), which indicates that: "extensions to any re-used rural building and associated land surrounding the

building will be strictly controlled, where this would conflict with the openness of the Green Belt and the purpose of including land in it." I shall deal with the objection on that basis.

8.6.4 The objector considers that the wording of criterion b) is too restrictive in that it could be used to prevent any extension, even where such development is considered appropriate in the Green Belt. However, I note that it clearly mirrors the intention and wording of Paragraph 3.8(b) of PPG2. The Council has explained that criterion b) is concerned with the impact of development on the openness of the countryside rather than on the quality of the landscape. Again, this accords with advice in PPG2 and I therefore see no reason to alter the wording of the Policy.

Recommendations

8.6.5 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD23 (relating to Policy C27).

(b) That no further modifications be made to the Plan in respect of this objection.

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8.7 Policy C27C – Extensions to Converted Rural Buildings [Proposed Modification No CTRY/MOD24]

995/1385 Stansgate Planning Consultants
1243/1007 Wall James & Davies (various clients)

Key Issues

8.7.1 (1) Whether a proposed extension should be in keeping with the building as converted rather than the original building.

(2) Whether the word 'original' should be defined in the explanatory text.

(3) Whether the Policy should be augmented to refer to the openness of the Green Belt as a factor in assessing proposals for extensions.

Inspector's Appraisal and Conclusions

8.7.2 **Issue 1:** Both objectors argue that once a rural building has been converted it takes on the character of that new use. Consequently, any proposed extension should be in keeping with the building as converted, rather than the original, and should pay due regard to its new physical characteristics.

8.7.4 I cannot accept that line of reasoning. Virtually any conversion from, say, a traditional farm building involves a measure of compromise. While it ought to retain much of its agricultural appearance it will after conversion inevitably acquire a number of other features. If any subsequent extension was to be related only to the new use, a similar process of compromise would further diminish the building's original appearance and integrity. Over the years the cumulative effect of even more additions and alterations carried out in a piecemeal fashion could well be a considerable loss of character, making the structure effectively indistinguishable from any other building and out of touch with its rural origins. Such a process of attrition would prove harmful to its setting.

8.7.5 Even though PPG7 offers no specific guidance on this matter, the general thrust of countryside policy is to retain the character of buildings that have a traditional form and distinctive appearance. One of the objectors sees Policy C27C as a possible hindrance to commercial or industrial development in the countryside which PPG7 promotes. However, a broader common-sense view has to be taken that balances the promotion of rural development with the need for environmental protection. I am in no doubt that it would be wrong either to delete the Policy altogether, leaving a policy vacuum, or to modify it so that an extension would be assessed against the building as it currently exists rather than as it was in its original form prior to conversion.

8.7.6 **Issue 2:** I agree with Wall James and Davies that to introduce a different definition of 'original' from that employed elsewhere in the Plan (that is, as it existed on 1 January 1948) would be confusing. It would be preferable in my view to use an alternative form of words in the Policy itself. I suggest: "the building as it existed immediately prior to conversion".

8.7.7 **Issue 3:** Policy C27 addresses the re-use of existing rural buildings in the Green Belt. Criterion b) refers to extensions. It states that "extensions to any re-used rural building and associated land surrounding the building will be strictly controlled, where this would conflict with the openness of the Green Belt and the purposes of including land in it."

8.7.8 Although the Plan must be read as a whole, it would I believe be clearer for Plan users if Policies C27 and C27C were cross-referenced in some way. The Council suggests expanding Policy C27C. I think it would be better, and would avoid duplication, if the supporting text to Policy C27C simply carried a cross-reference to criterion b) of Policy C27. This would serve as a reminder that in considering

extensions to re-used rural buildings in the Green Belt both Policies need to be satisfied.

Recommendations

8.7.9 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD24, subject to the following additional modifications:

(i) Policy C27C be redrafted to read:

"Proposals for extensions to converted rural buildings will be assessed against the impact of the scheme on the character of the building as it existed immediately prior to conversion rather than the use to which it has been converted."

(ii) The explanatory text to Policy C27C be modified to carry a cross-reference to criterion b) of Policy C27.

(b) That no further modifications be made to the Plan in respect of these objections.

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8.8 Policy C28 – Deletion recommended by BDLP Inspector [Proposed Modification No CTRY/MOD25]

405/1157 P W King

Key Issue

8.8.2 Whether policy provision should be made for the sympathetic re-use of derelict buildings (including listed buildings) that have ceased to have any current use, subject to preservation of their historic character.

Inspector's Appraisal and Conclusions

8.8.3 Both the Council and the BDLP Inspector were of the opinion that Policy C28 should be deleted. By referring to the contents of the Council's Policy Guidance Note 4 it provided an inappropriate basis for deciding planning applications and was contrary to the advice in PPG12. I concur with those views.

8.8.4 In light of my conclusion, there is no need for me to address the issue of the re-use of derelict buildings. I note, however, that the Plan contains other provisions for re-use and adaptation, requiring proposals to be compatible with Green Belt policies and buildings to be of sound construction so as to prevent the necessity of rebuilding.

Recommendations

8.8.5 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD25.

(b) That no further modifications be made to the Plan in respect of this objection.

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8.9 Policy C30 – Twelve Month Limit for Re-Use of Building [Proposed Modification No CTRY/MOD26]

407/1157 P W King

Key Issue

8.9.2 Whether Policy C30 should apply to important historic, but obsolete, industrial buildings suitable for conversion.

Inspector's Appraisal and Conclusions

8.9.3 The objector does not oppose the principle of a twelve month time-limit for commencement of development, provided it is intended to run from the date of planning permission being granted and not the date when a preceding use ceased. This the Council has confirmed. The objection is more specifically concerned with the application of this Policy to a particular scenario. The Council has indicated that the Policy is intended to apply to any rural building. In light of these comments and my conclusions with regard to Policy C27, I do not consider it necessary to make any additional modifications.

Recommendations

8.9.4 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD26.

(b) That no further modifications be made to the Plan in respect of this objection.

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8.10 Policy C30A – New Agricultural Buildings [Proposed Modification No CTRY/MOD27]

996/1385 Stansgate Planning Consultants

Key Issue

8.10.2 Whether the Policy is overly stringent and unnecessary.

Inspector's Appraisal and Conclusions

8.10.3 This Policy is intended to apply to proposals for agricultural buildings which either require a specific planning permission or are permitted by the Town and Country Planning (General Permitted Development) Order 1995 (GPDO) but require prior notification to the local planning authority. The supporting text explains that 'need' is not a relevant consideration in the latter case.

8.10.4 With just a few exceptions (eg agricultural workers' dwellings; retailing), there is no general requirement for an applicant to demonstrate need for a development. I agree with the objector that this element of the Policy is over-stringent and should be omitted.

8.10.5 The objector contends also that the criteria listed in Policy C30A against which agricultural buildings will be assessed are effectively duplicated by Policies DS2 (Green Belt Criteria), C4 (Criteria for Assessing Development Proposals) and C5 (Submission of Landscaping Schemes) - rendering the Policy unnecessary.

8.10.6 I accept that there is a small degree of overlap. Policy DS2 allows development for the purposes of agriculture or forestry, providing it does not damage the visual amenities of the Green Belt; Policy C4 seeks to minimise harm to the landscape, particularly within Landscape Protection Areas; and Policy C5 requires the submission of a landscaping scheme. However, I am satisfied that criteria b), c) and d) of Policy C30A, which address detailed matters including scale, design, grouping and materials, are all very relevant considerations that are not covered elsewhere.

8.10.7 I conclude that Policy C30A should be retained, subject to omission of any reference to 'need'. In my opinion it provides an appropriate policy base against which to test proposals for new agricultural buildings.

Recommendations

8.10.8 (a) That the Plan be modified in accordance with Proposed Modification CTRY/MOD27, subject to the following additional modifications:

(ii) Policy C30A be altered to read:

"Proposals for new agricultural buildings will be considered favourably where they comply with the following criteria:

e) the proposal is in accordance with the provisions of Policies C4 and C5;
f) the scale and design of the building is appropriate to its intended use;
g) the proposal forms part of a group of buildings wherever practicable;
h) appropriate materials and dark matt colours are employed wherever practicable."

(ii) Paragraph 10.35B of the supporting text be altered to read:

"This policy is intended to cover proposals for agricultural buildings which either require a specific planning permission or are permitted by the Town and Country Planning (General Permitted Development) Order 1995 but require prior notification to the Local Planning Authority."

(b) That no further modifications be made to the Plan in respect of this objection.

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9. TRANSPORT

9.1 Overview

9.1.2 In general I support the Council's Proposed Modifications and Further Changes. I do, however, recommend several alterations to take account of revised national planning policy. I suggest that a more wide-ranging re-evaluation of transportation issues be carried out as part of the Local Plan Review process.

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9.2 Policy TR1 – The Road Hierarchy [Proposed Modification No TRAN/MOD1]

64/1019 Mr & Mrs Rachman

Key Issue

9.2.2 Whether development along Birmingham Road, Alvechurch would adversely affect the quality of life of local residents.

Inspector's Appraisal and Conclusions

9.2.3 The purpose of this Policy is to enable proposals to be assessed against the standards applied by the Highway Authority to each category of road as outlined in the County Council's Local Transport Plan. The objectors are concerned that further development at Birmingham Road, Alvechurch would increase vehicular and pedestrian traffic flows, which in turn would have an adverse effect on access, noise and quality of life for residents. While I understand those concerns, I do not consider that they challenge the principle of this Policy nor any of its elements. The Council has confirmed that all future development will be subject to the normal planning application consultation procedures with the Highway Authority. In this regard, I note that Worcestershire County Council has raised no objection to any of the ADR sites promoted by the District Council in Alvechurch.

Recommendations

9.2.4 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD1.

(b) That no further modifications be made to the Plan in respect of this objection.

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9.3 Policy TR2 – Safeguarding of Land for Future Road Proposals [Proposed Modification No TRAN/MOD2]

411/1157 P W King
536/1221 J H Gemmill

Key Issue

9.3.2 Whether the line of the Kidderminster-Blakedown-Hagley by-pass should be indicated in the Plan.

Inspector's Appraisal and Conclusions

9.3.3 The Council has proposed a Further Change to show the line of the Kidderminster-Blakedown-Hagley by-pass safeguarded in the Plan. I consider this to be appropriate and, in consequence, the objectors' concerns have been addressed. This conclusion will also have a bearing on Objection 1/1000 concerning the identification of the by-pass on the Proposals Map.

Recommendation

9.3.4 That the Plan be modified in accordance with Proposed Modification TRAN/MOD2, subject to Further Change 4.

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9.4 Policy TR5A – Railfreight [Proposed Modification No TRAN/MOD5]

1097/1390 CPRE

Key Issue

9.4.2 Whether the Policy should be expanded to identify and protect alternative accesses to railhead sites.

Inspector's Appraisal and Conclusions

9.4.3 This is a new Policy introduced since the deposit draft BDLP was published. The intention is twofold - firstly, to protect existing railhead sites by ensuring that they retain appropriate access to and from the public highway network and, secondly, to protect those sites with a potential for receiving and dispatching goods by rail from development that would preclude such use.

9.4.4 The Council's emphasis is very much on retaining existing access arrangements. In contrast, the objector sees a wider role of identifying/protecting alternative accesses to both existing and potential railhead sites and refusing permission for any development that would obstruct those arrangements.

9.4.5 There is only one extant railfreight facility in the District which could be made available for public use and which is directly accessed from the public highway - the former goods station at Bromsgrove, previously used as a private oil terminal. Reference is made to other potential sites at Longbridge (Cofton), the premises of United Engineering Forgings at Newton Works, and the Stoke Works but there is no firm evidence that any of these are likely to be reactivated in the near future.

9.4.6 Much of the representation relates to site specific concerns about access to the Bromsgrove railhead site. I agree with the Council that where firm proposals come forward or are anticipated it would be sensible to address these in the Local Plan Review as an area policy. That would also provide the appropriate forum to consider changes resulting from the application of PPG13 (Transport), the WCSP and the Local Transport Plan. In the meantime, the more general approach taken by the Council in the BDLPPM seems to me to be about right. The Council has clearly set out its support for the principle of railhead protection, both of existing and potential facilities. But it is necessary to maintain a balanced approach. In my view, over-enthusiastic policy protection of potential alternative access arrangements could compromise equally or even more beneficial land use changes.

Recommendations

9.4.7 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD5.

(b) That no further modifications be made to the Plan in respect of this objection.

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9.5 Policy TR8 – Off Street Parking Requirements [Proposed Modification No TRAN/MOD7]

1099/1390 CPRE

Key Issue

9.5.1 Whether the Policy adequately reflects parking policy set out in the WCSP.

Inspector's Appraisal and Conclusions

9.5.3 The objector is concerned that Policy TR8 may not accord with the latest strategic policy on car parking that interprets the approach outlined in PPG13 (Transport). WCSP Policy T.4 refers to demand management measures to discourage travel by car. Amongst other matters, these include car parking standards for new development which vary to reflect use, location (in particular proximity to public transport nodes) and accessibility by non-car modes, and which are expressed in terms of maximum provision.

9.5.4 The Council's response is that the BDLP is founded on the HWCSP with which it was certified as being in conformity in December 1993. The County Council has not objected to Policy TR8. The District Council does not necessarily agree that Policy TR8 is at odds with the new strategic policy position, although this will be examined through the medium of the Local Plan Review now being undertaken.

9.5.5 At the inquiry the parties came to a compromise which resulted in the objection being 'conditionally withdrawn'. The agreement was that the word "adequate" is unnecessary and should be removed from the Policy. I endorse that further modification which helps to remove the implication that the maximum standard has to be achieved in all cases, in favour of a position whereby it should be met wherever appropriate.

9.5.6 In addressing this matter I would also recommend that the Council re-examines the parking standards set out in Appendix 17 to satisfy itself that they accord with the Maximum Parking Standards listed in Annex D of PPG13.

Recommendations

9.5.7 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD7, subject to the following additional modification:

Policy TR8 be altered to read:

> **"Development proposals which do not make provision for off-street parking in line with the District Council's parking requirements will not normally be granted planning permission."**

(b) That the Car Parking Standards in Appendix 17 be reviewed to ensure that they comply with the Maximum Parking Standards set out in Annex D of PPG13.

(c) That no further modifications be made to the Plan in respect of this objection.

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9.6 Policy TR13 – Alternative Modes of Transport [Proposed Modification No TRAN/MOD12]

1103/1391 Birmingham City Council
1195/1399 West Midlands Planning & Transportation Sub Committee

Key Issues

9.6.1 (1) Whether the Policy addresses the needs of long distance commuters to the regional centres.

(2) Whether the Council has failed to take account of RPG11 and Policy T.7 of the WCSP by not identifying any potential bus-based park and ride sites within the District.

Inspector's Appraisal and Conclusions

9.6.2 **Issue 1:** The objectors argue that the Policy has not recognised the alternative transport requirements of long distance commuters to the regional centres. They consider that Policy TR13 should include areas of search for strategic park and ride schemes to augment existing rail-based sites. These

should, they say, be focused on major highway interchanges or junctions, as well as on sites designed to serve motorway traffic specifically.

9.6.4 This is a general policy designed to promote the use of alternative modes of transport. Regional park and ride schemes are beyond its scope. Nevertheless, there is nothing contained in the Policy that would exclude or discourage a broadening of the transportation options available to the travelling public. I note that the Council is generally supportive of the need for park and ride facilities and does not dispute the appropriateness of providing infrastructure to encourage commuters to switch from private to public transport services.

9.6.5 **Issue 2**: The BDLPPM pre-dates the WCSP which was adopted as recently as June 2001. To make specific provision for bus-based park and ride schemes would require the Council to undertake a considerable amount of careful investigation. I concur with the Council that it would be more appropriate to conduct the necessary work as part of a comprehensive Review of the Local Plan. This process would then take account of the provisions and responsibilities outlined in RPG11, PPG13 and the WCSP.

Recommendations

9.6.6 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD12.

(b) That no further modifications be made to the Plan in respect of these objections.

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9.7 Policy TR15 – Car Parking at Railway Stations [Proposed Modification No TRAN/MOD14]

412/1157 P W King
413/1157 P W King
1100/1390 CPRE

Key Issues

9.7.1 (1) Whether the Policy should lay down guidelines for park and ride schemes.

(2) Whether the Policy should provide for edge-of-town park and ride at Bromsgrove and adjoining the main roads leading into Birmingham.

(3) Whether the Policy should promote a wider range of facilities to encourage increased use of the railways.

Inspector's Appraisal and Conclusions

9.7.2 **Issues 1 and 2:** Policy TR15 is designed to encourage greater use of rail services by enhancing car parking at railway stations. It is made clear in the explanatory text that the Council will support park and ride schemes. Indeed, a number of potential sites are included in the Area Policies section of the Plan.

9.7.3 The objector argues that more specific guidance on park and ride is needed, and that the scope of the Policy could be broadened to include other forms of public transport. It is suggested that one of the objective criteria would be good uncongested road access from the main highway network. This would, it is claimed, preclude rail park and ride at places like Hagley where the station is located in a heavily built up area and is accessed along a no-through-road which also serves a large number of houses and 2 secondary schools and is extremely congested at peak times. As an alternative to rail-based park and ride, the objector considers that bus or tram schemes could be encouraged along main routes on the edges of towns and cities like Bromsgrove and Birmingham.

9.7.4 The Council has elected to focus on the railway system, building on the findings of the County Council's 1997 Transport Corridors Study that has been used to guide the location of future development. It has done this in preference to promoting other forms of park and ride, such as bus-based schemes, in order to encourage a modal shift to the railways and to take account of the considerable pressure to which the road network in and around the District is already subject. This is, I believe, a legitimate approach. Although policy criteria directed at park and ride schemes in general would prove useful, they are not in my view an essential component of this Plan. Each scheme put forward will have to be considered on merit and assessed in light of the many site specific issues that apply. No doubt the Council will, when carrying out a Review of the Local Plan give further consideration to the need for a separate, broader policy on the topic of park and ride.

9.7.5 **Issue 3:** The objector is concerned that by seeking only to enhance car parking at railway stations, Policy TR15 has been drawn too narrowly and does not properly reflect the provisions of WCSP Policy T6 which puts 'improved arrangements for car parking' (where appropriate) at the bottom of the shopping list. The CPRE acknowledges that more car parking is needed, particularly at Bromsgrove, but says that this must not be achieved at the expense of improved accessibility for pedestrians and cyclists, and those arriving by bus, taxi and 'kiss

and ride'. Without those complementary improvements, additional car parking could, it is claimed, result in greater rather than less car use.

9.7.6 It is clear that the objector is seeking to extend the scope of the Policy. This is borne out by the suggestion that its title be changed from 'Car Parking at Railway Stations' to 'Encouragement of the Use of Public Transport'. I agree with the Council that it is not the purpose of this Modifications inquiry to create new policy. And there is no surprise in the fact that WCSP Policy T6 is broader-based; it is of much more recent origin than Policies of the BDLP which were drafted in the context of the earlier HWCSP.

9.7.7 I acknowledge that a whole range of improvements are desirable at most railway stations in the District. Nevertheless, I concur with the Council that car parking is perhaps the most obvious deficiency, being inadequate or lacking in virtually all cases. I am in no doubt that improvements in this critical area would be of considerable benefit in encouraging better use of the rail network. Consequently, I consider it appropriate to single out this matter for policy treatment in the BDLP.

9.7.8 While the aims of the objector are supported, I feel that the broader issue of encouraging greater use of public transport is one that can most satisfactorily be addressed through the successor Plan - the Local Plan Review. This is currently being prepared against the policy background of the WCSP, the Local Transport Plan and latest government planning policy guidance.

Recommendations

9.7.9 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD14.

(b) That no further modifications be made to the Plan in respect of these objections.

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9.8 Policy TR16 – Cycle Routes [Proposed Modification No TRAN/MOD15]

1101/1390 CPRE

Key Issue

9.8.1 Whether the Policy should also include provision for walking and is sufficiently clear and strong.

Inspector's Appraisal and Conclusions

9.8.2 In promoting a modal shift from the private car to more sustainable forms of transport, the government is seeking to provide for both cycling and walking. The objector is concerned that Policy TR16 only addresses the cycling component.

9.8.4 This Policy was reviewed by the BDLP Inspector who recommended that the Council's Proposed Changes be accepted, subject only to relatively minor alterations to the wording of the Policy. In contrast, the further modifications now sought by the objector are significant. They would expand the Policy to cover walking. I agree with the Council that this is a matter that should have been raised at the BDLP inquiry. However, regardless of that, pedestrian routes and footpath networks are recognised elements of site layout and design. Those matters are routinely taken on board by architects and developers when formulating their proposals and negotiating with the Local Planning Authority, and by Council officers when assessing planning applications. In my experience this has been to a far greater extent, historically, than has been the case with cycle routes. Consequently, I see no practical requirement to extend the scope of Policy TR16.

9.8.5 The objector contends that the Policy as currently drafted is both weak and unclear. It is certainly more flexible than that proposed by the CPRE. But it does fairly set out the Council's intentions and expectations. In my opinion it provides an appropriate policy base from which to negotiate cycling facilities and routes. In contrast, the revised text suggested by the objector is defective in at least one area in requiring walking and cycling facilities to be provided in off-site locations.

9.8.6 Finally, like some of the other policies in the Transport section of the Plan this is an area that might fruitfully be looked at again as part of the Local Plan Review process, in the light of evolving government guidance. If it is decided at that stage to introduce a policy in respect of walking routes, it should in my view be free-standing and not combined with a policy relating to cycling or any other transport mode.

Recommendations

9.8.7 (a) That the Plan be modified in accordance with Proposed Modification TRAN/MOD15.

(b) That no further modifications be made to the Plan in respect of this objection.

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10. RECREATION

10.1 Overview

10.1.1 All of the Council's proposed modifications to this chapter of the Plan are supported.

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10.2 Policy RAT4 – Retention of Open Space [Proposed Modification No RAT/MOD4]

414/1157 P W King
1142/1394 Sport England

Key Issues

10.2.1 (1) Whether provision should be made to exchange poor quality open space for better quality facilities in the immediate neighbourhood.

(2) Whether specific criteria to assess the long-term value of open space areas under threat of development would be appropriate.

Inspector's Appraisal and Conclusions

10.2.2 **Issue 1**: The objector's suggestion regarding the exchange of poor quality open space for better quality facilities in the vicinity appears to contradict the intention of this Policy which is to retain and enhance existing open space. Like the Council, I am of the opinion that situations where relocation could occur would be very limited due to development pressures in the District. I consider that it would be difficult to adequately categorise 'poor' and 'better quality facilities', as referred to by the objector. Therefore I believe the objector's suggestion to be aspirational in content and implementation.

10.2.3 **Issue 2**: The BDLP Inspector accepted that there could conceivably be instances in which development of open spaces was acceptable but remarked that no suitable criteria had been put to him. For its part, the Council has indicated that there will be very few instances where it will not seek to retain existing areas

of open space. In these circumstances I think it would be needlessly prescriptive to draw up specific criteria as suggested by the objector.

Recommendations

10.3.4 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD4.

(b) That no further modifications be made to the Plan in respect of these objections.

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10.4 **Policy RAT6 – Open Space Provision in New Residential Developments [Proposed Modification No RAT/MOD5]**

418/1157 P W King
419/1157 P W King

Key Issues

10.3.1 (1) Whether there should be a requirement that on certain developments open space be provided as a single parcel of land.

(2) Whether the Policy should require open space to be provided only in places safe for children to play.

Inspector's Appraisal and Conclusions

10.3.2 **Issue 1**: The objector considers that, except for large developments of over 100 dwellings, open space should be provided as a single area of land. I accept that certain benefits can be gained through the provision of open space as a single parcel. However, the individual circumstances of each development will vary and must be a material consideration. Like the Council, I believe that the Policy as it stands provides an appropriate degree of flexibility to achieve and maximise those benefits. To go further and incorporate the objector's suggestion would I believe create an unduly restrictive policy.

10.3.3 **Issue 2**: This issue relates to the safety of children. The National Playing Fields Association defines outdoor playing space as "space … which is of a suitable size and nature for its intended purpose and safely accessible and available to the general public" (P.9 The Six Acre Standard: Minimum Standards

for Outdoor Playing Space). Policy RAT5 'Provision of Open Space' reflects this definition. In the explanatory text are outlined appropriate considerations governing the provision of children's play space. These include social safety, accessibility and play value. Reading the Plan as a whole, I consider RAT5 and RAT6 make ample provision for play space to be provided in sensible and safe locations.

10.3.5 The objector highlights the lack of informal recreation space in Hagley. The previous Inspector dealt with a similar issue in connection with Alvechurch. He remarked that this Policy is concerned with securing open space provision for new developments and does not attempt to address the question of established needs. That is indeed the position.

Recommendations

10.3.6 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD5.

(b) That no further modifications be made to the Plan in respect of these objections.

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10.4 Policy RAT7 – Sports Hall Standards [Proposed Modification No RAT/MOD6]

1143/1394 Sport England

Key Issue

10.4.1 Whether the Policy makes it clear that artificial playing surfaces are not seen as a straight substitute for natural playing surfaces.

Inspector's Appraisal and Conclusions

10.4.2 The objector contends that there is a danger the Policy may suggest artificial playing surfaces are an alternative to natural playing surfaces. I do not believe this to be the case. The wording of the explanatory text closely follows the wording of Paragraph 29 of PPG17 in relation to the provision of indoor sport and outdoor synthetic or other surfaces capable of intensive use. The Plan should be read as a whole and I believe that other Policies in the Plan are capable of

providing for the protection of natural playing surfaces; in particular RAT4 and S32. I conclude that no change in the wording of this Policy is required.

Recommendations

10.5.3 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD6.

(b) That no further modifications be made to the Plan in respect of this objection.

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10.6 Policy RAT 8 – Dual Use Facilities [Proposed Modification No RAT/MOD7]

30/1007 Wall James & Davies (various clients)

Key Issue

10.5.2 Whether the Policy should indicate that dual use of school sports facilities for non-school purposes will only be allowed if it would not materially adversely affect the amenity of the occupiers of nearby residential properties.

Inspector's Appraisal and Conclusions

10.5.3 The aim of this Policy is firmly based in PPG17. The Council has acknowledged through criteria (c), (e) and (f) that dual use can have an effect on residential amenity. However, like the Council, I believe it would prove extremely difficult to distinguish between non-school and school activities. While I understand the concerns of the objector relating to the social problems created by such schemes, these matters are beyond the scope of land-use planning and therefore are beyond the remit of this Plan and inquiry. Furthermore, it would appear that the wording as proposed by the objector could potentially prevent any non-school uses - which would be contrary to the intention of both Policy RAT8 and PPG17.

Recommendations

10.5.4 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD7.

(b) That no further modifications be made to the Plan in respect of this objection.

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11. RIGHTS OF WAY

11.1 Overview

11.1.1 The Council's proposed modification to delete Policy RAT14 is supported.

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11.2 Policy RAT14 – Stopping-Up a Right of Way [Proposed Modification No RAT/MOD10]

29/1007 Wall James & Davies (various clients)

Key Issue

11.2.2 Whether the Policy should contain a reference to RAT4(a) that 'the Recreation Ground at Bromsgrove will be retained as public open space'.

Inspector's Appraisal and Conclusions

11.2.3 I agree with the Council that this objection does not appear to relate to Policy RAT14 at all, but is more relevant to Policy RAT4. With regard to Policy RAT14, I concur with the BDLP Inspector's view that it was an 'aspirational policy' and should be deleted.

11.2.4 Turning to the relevance of this objection to Policy RAT4; this is a general policy for the whole District and does not, and indeed should not, attempt to deal with particular sites. Since the objection is specifically concerned with the Recreation Ground in Bromsgrove, I consider the change suggested by the objector to be inappropriate.

Recommendations

11.2.5 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD10.

(d) That no further modifications be made to the Plan in respect of this objection.

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13. TOURISM

12.2 Overview

12.1.1 I recommend a further modification to Policy RAT30 to make it less prescriptive.

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12.2 Policy RAT30 – Caravan Storage [Proposed Modification No RAT/MOD25]

44/1004	Alvechurch Parish Council
31/1007	Wall James & Davies (various clients)
997/1385	Stansgate Planning Consultants

Key Issue

12.2.1 Whether it is reasonable to preclude all new storage facilities for touring caravans in the Green Belt.

Inspector's Appraisal and Conclusions

12.2.2 Policy RAT30 is an extremely restrictive policy. It prevents any new storage facilities for touring caravans being established in the Green Belt. The reason given in the explanatory text is that such a use is likely to have an unacceptable impact upon the landscape.

12.2.3 However, the Policy makes no distinction at all between indoor and outdoor storage. As Alvechurch Parish Council recognises, many redundant farm buildings, as well as other rural buildings, can readily accommodate touring caravans without the need for structural alterations or capital outlay and with no effect at all on the landscape. It can assist in farm diversification by providing a modest alternative income. It can also help to reduce the eyesore of caravans stored in driveways and gardens in residential areas. Whether such a use is likely to continue over a longer period given the potentially greater returns from residential or employment development is not a relevant planning consideration.

12.2.4 I see no reason why the Policy should be as restrictive as it is, notwithstanding the modification recommended by the BDLP Inspector. Various additions and

alternative forms of policy wording have been suggested by the objectors. I consider that a simple modification is all that is required to protect the countryside and to make it clear that it is only the open storage of touring caravans that is precluded. An application for planning permission would, of course, still have to be assessed against other Plan policies, including those relating to the Green Belt and to the re-use of existing rural buildings. Other factors to be taken into consideration might include traffic generation and the suitability of access roads. Any consent given would need to be closely defined by planning conditions to preclude, for example, ancillary outside storage.

Recommendations

12.2.6 (a) That the Plan be modified in accordance with Proposed Modification RAT/MOD25, subject to the following additional modifications:

(i) Policy RAT30 be amended to read:

"New open storage facilities for touring caravans will not be acceptable in the Green Belt."

(ii) The explanatory text be altered to reflect this policy change.

(b) That no further modifications be made to the Plan in respect of these objections.

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13. ENVIRONMENTAL SERVICES

13.1 Overview

13.1. Some further modifications of a relatively minor nature are recommended in respect of both policies and supporting text to clarify and correct where necessary, and to address recent changes in national planning policy.

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13.2 PARA 14.5 – Sewerage Systems [Proposed Modification No ENV/MOD3]

1027/1385 Stansgate Planning Consultants

Key Issue

13.2.1 Whether the BDLP Inspector's recommendations have been correctly interpreted by the Council.

Inspector's Appraisal and Conclusions

13.2.2 There are 2 areas of confusion. Firstly, the previous Inspector recommended that Paragraph 14.5 of the BDLP be modified in accordance with the Council's Proposed Change 7.1. In accepting and acting upon that recommendation, the Council has referred in error to Paragraph 14.1 in the Schedule of Proposed Modifications (although correctly included the modification in the June 2000 version of the BDLPPM).

13.2.3 Secondly, the BDLP Inspector made recommendations in Paragraph 7.55 of his report to 3 different elements of the Plan - namely, Paragraph 14.5, Policy ES4 and Policy ES5. While accepting all of the Council's proposed changes, he suggested that the title of Policy ES4 be amended from 'Aquifer Protection Zones' to 'Groundwater Protection'. Those alterations were subsequently incorporated into the Schedule of Proposed Modifications as ENV/MOD3, ENV/MOD4 and ENV/MOD5. Confusingly though, the impression is given in that document that the change in Policy title relates to all 3 modifications when it is in fact only relevant to ENV/MOD4.

13.2.4 Those inaccuracies have been acknowledged by the Council. They should I feel be formally corrected for the record.

Recommendations

13.2.6 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD3, subject to the following corrections:

(i) that the reference in the Schedule of Proposed Modifications (Document 3), be to Paragraph 14.5 (and <u>not</u> Paragraph 14.1).

(ii) that it be recorded that the change of title from 'Aquifer Protection Zone' to 'Groundwater Protection' relates to Policy ES4 only (and <u>not</u> Paragraph 14.5 of Policy ES3).

(b) That no further modifications be made to the Plan in respect of this objection.

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13.3 Policy ES9 – Undergrounding of Supply Cables [Proposed Modification No ENV/MOD10]

45/1001 Dodford with Grafton Parish Council
420/1157 P W King

Key Issues

13.3.1 (1) Whether the Policy should include a list of priority locations and an explanation of the methodology used.

(2) Whether the Policy should provide for the undergrounding of all cables.

Inspector's Appraisal and Conclusions

13.3.2 **Issue 1**: Dodford with Grafton Parish Council argues that the Plan should set out a list of conservation areas where priority will be given to the undergrounding of existing telephone and electricity service lines and an explanation of how that list has been drawn up. In view of the significance of the Dodford Conservation Area, it is contended that Dodford should be afforded the very highest priority.

13.3.4 For its part, the Council points out that the rewording of Policy ES9 was undertaken on the recommendation of the BDLP Inspector. It was never the intention to incorporate a priority list in the Plan itself, simply because circumstances can change over time necessitating alterations. I note that the Council intends to prepare supplementary planning guidance which will be used as a basis for consultation with interested parties.

13.3.5 The Council's approach seems eminently sensible to me and I recommend accordingly. I would however urge that this SPG be prepared as soon as possible.

13.3.6 **Issue 2**: Another objector considers that Policy ES9 should require all cables to be placed underground, unless there are very good reasons why this is not possible. I agree with the BDLP Inspector that the Council's role in achieving progress must, effectively, be limited to discussion and encouragement. The utility service providers have made it clear that it is neither practicable nor cost effective to undertake undergrounding of supply cables on such a general scale. The objector's suggestion would therefore render this Policy aspirational and unrealistic. I note that the National Grid Co plc supports the Policy, acknowledging that it adequately reflects the limited ability of the Council to influence this matter.

Recommendations

13.3.7 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD10.

(b) That the explanatory text be modified to include a reference to SPG through which a list of priority locations for undergrounding works will be maintained.

(e) That no further modifications be made to the Plan in respect of these objections.

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13.4 Policy ES13 – Development of Telecommunication Facilities [Proposed Modification No ENV/MOD12]

46/1004 Alvechurch Parish Council

Key Issue

13.4.1 Whether the Policy should take a more precautionary approach in the light of health concerns relating to telecommunications masts.

Inspector's Appraisal and Conclusions

13.4.2 The Parish Council is concerned, on health grounds, about the close proximity of telecommunications masts to populated areas. I can appreciate those fears. However, a new PPG8 (Telecommunications) has very recently been published by the government. This indicates clearly at Paragraphs 29–31 that while health considerations and public concern can in principle be material considerations in determining planning applications, the planning system is not the place for determining health safeguards. It further states that Local Planning Authorities should not implement their own precautionary policies beyond those stated.

13.4.3 In light of this up-to-date advice on health concerns, I consider it would be beneficial if the Council was to reflect this in its Local Plan. I suggest therefore that a reference to PPG8 and the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines be included in the explanatory text.

Recommendations

13.4.5 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD12, subject to the following additional modification:

Paragraph 14.15 be expanded to make reference to the government's approach to planning for telecommunications development and the guidelines contained in PPG8.

(b) That no further modifications be made to the Plan in respect of this objection.

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13.5 Policy ES16 – Reforming of Land [Proposed Modification No ENV/MOD15]

47/1004 Alvechurch Parish Council
999/1385 Stansgate Planning Consultants

Key Issues

13.5.1 (1) Whether the Policy is necessary in light of other policies in the Plan and normal development control criteria.

(2) Whether the Policy should be modified to include reference to a time limit and provide for compensation to be claimed from developers with regard to any damage caused to the local road network.

Inspector's Appraisal and Conclusions

13.5.2 **Issue 1**: It is contended that Policy ES16 is unnecessary and should be deleted because proposals of this type and their implications are already adequately covered by development control criteria and other policies contained in the Plan. The Council says this new Policy has been introduced in response to frequent problems associated with the reforming of land. PPG12 (Development Plans) indicates that policies should concentrate on those matters likely to provide the basis for considering planning applications or for determining conditions to be attached to planning permissions. As Policy ES16 aims to clarify the approach taken by the Council and to guide potential developers, I consider that it is beneficial. It brings together under one topic heading the various factors that will have a bearing on any assessment. As such it makes a meaningful contribution to the decision making process. I therefore endorse the inclusion of this Policy in the Plan.

13.5.3 **Issue 2**: In order to prevent nuisance associated with such development from continuing indefinitely it is argued that the Policy should indicate a time limit for the completion of operations. I do not believe this to be appropriate. There are many and varied circumstances that can affect the time required to carry out development in any particular case. This is a matter that would need to be considered at the planning application stage under criterion d) of the Policy, and addressed as necessary by the imposition of conditions or by seeking a planning obligation under S106 of the Town and Country Planning Act 1990.

13.5.5 It is also argued that it would be reasonable to seek payment from a developer for damage caused to the local road network, rather than the cost of repairs falling on the Highway Authority. Photographic and video evidence could be used to calculate excessive damage which would be claimed as compensation against a bond provided by the developer prior to commencement of works. I agree with the Council that it would, in practice, be difficult to enforce such provisions. They are, in any event, matters for the Highway Authority. It would not be appropriate in my view to seek to address issues of this nature through a general Local Plan policy.

13.5.6 The Council has suggested that any planning permission granted for engineering operations of this type could be made subject to a condition to provide wheel

washing facilities. This would clearly be appropriate in many circumstances. However, given that Policy ES16 is intended to be of general application and would be relevant to development of widely varying scales it would not be appropriate in my opinion to make this a mandatory policy requirement.

Recommendations

13.5.7 (a) That the Plan be modified in accordance with Proposed Modification ENV/MOD15.

(c) That no further modifications be made to the Plan in respect of these objections.

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15. ALVECHURCH

14.1 Overview

14.1.1 I support the BDLP Inspector's recommendation that Alvechurch be inset from the Green Belt. I ratify the selection of ALVE6, ALVE7 and ALVE8 and reject other ADR proposals.

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14.2 Policy ALVE1 – Removal of Alvechurch from Green Belt recommended by Inspector [Proposed Modification No AREA/MOD2]

77/1023 Alvechurch Village Society
1263/1382 Bryant Group

Key Issue

14.2.1 Whether it is appropriate to inset Alvechurch from the Green Belt.

Inspector's Appraisal and Conclusions

14.2.2 The BDLP Inspector dealt with a similar issue in his report. He recommended that Alvechurch be inset from the Green Belt on the basis that it is a substantial village with a good range of local services and is located in a transport corridor. It is therefore a sustainable location in which it is appropriate to accommodate some future growth. I agree that it would serve no useful purpose for the Green Belt to 'wash-over' this settlement. No new or additional information has been presented to lead me to any different conclusion. I therefore endorse the BDLP Inspector's recommendation to inset Alvechurch from the Green Belt.

Recommendations

14.2.3 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD2.

(c) That no further modifications be made to the Plan in respect of these objections.

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14.3 Policy ALVE5 – Density Restrictions [Proposed Modification No AREA/MOD4]

73/1004 Alvechurch Parish Council
1028/1385 Stansgate Planning Consultants

Key Issues

14.3.1 (1) Whether a further criterion should be added to the Policy, indicating that "due regard will be paid to any Village Design Statement".

(2) Whether the area to which the Policy relates should be shown on the Proposals Map.

Inspector's Appraisal and Conclusions

14.3.2 **Issue 1**: Alvechurch Parish Council is concerned that where a Village Design Statement (VDS) has been prepared, some recognition should be made of its implications. I have already considered elsewhere in my report the broader question of whether Plan Policies should include references to supplementary planning guidance of this kind (see Paragraphs 1.8.2-1.8.3). While it would not be appropriate to mention the VDS in the Policy itself, I feel there would be benefit in making such a reference in the explanatory text.

14.3.4 Policy ALVE5 relates to only part of the area covered by the Alvechurch VDS. When considering a planning application for development in this Area of Special Character, some of which falls within the Alvechurch Conservation Area, the Council will take into account all material considerations. That will include any supplementary planning guidance that is in existence.

14.3.5 **Issue 2**: The Council omitted to include a plan with Modification Document 3 illustrating the extent of this Area of Special Character. This error has been addressed through Correction 14 of the Erratum Sheet accompanying the Council's Further Changes. I note that on this basis, the objection has been conditionally withdrawn.

Recommendations

14.3.6 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD4, subject to:

(iii) the addition of a reference in the explanatory text to the Alvechurch Village Design Statement.

(iv) Correction 14.

(c) That no further modifications be made to the Plan in respect of these objections.

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14.4 Policy ALVE6 – Areas of Development Restraint [Proposed Modification No AREA/MOD5]

74/1002	The Hagley Estate
78/1004	Alvechurch Parish Council
968/1381	Billingham & Kite Ltd

Key Issue

14.4.2 Whether land adjacent to Crown Meadow should be designated as an ADR and excluded from the Green Belt.

Inspector's Appraisal and Conclusions

14.4.3 A general review of Alvechurch is included in my consideration of objections to Policy ALVE7 (see Paragraphs 14.5.1-14.5.7).

14.4.4 This particular site of 1.4ha is located at the northern-most point of the settlement in interim Green Belt and is bounded to the east and south by existing residential development. The northern edge of the land abuts an embankment of the M42 motorway while the western limits are defined by a disused arm of the Worcester-Birmingham Canal. These provide for a well-contained site with very strong defensible boundaries. In terms of the purposes of the Green Belt set out in Paragraph 1.5 of PPG2, future development in this location would not lead to encroachment into the countryside, would not encourage settlements to merge and would not represent the sprawl of a large built up area. Instead, it would provide an opportunity to 'round off' the settlement up to the highly defensible boundary

of the motorway. I therefore concur with the BDLP Inspector that designation of this site would have a minimal impact on the effectiveness of the Green Belt surrounding this part of the settlement.

14.4.5 I agree with the BDLP Inspector that Alvechurch is a suitable location for designation of ADR land due to its size and sustainability credentials. This is a large village with a reasonable range of facilities and services including local shops. It is located in a transport corridor as defined by the County Council's Transport Corridors Study, being within the 15 minute cycling/walking isochrone of a railway station. In my comments relating to ALVE7 I suggest that future development in Alvechurch presents an opportunity to encourage a modal shift to public transport - particularly if the station facilities were to be improved and secure car and cycle parking provided. While some objectors have expressed concern over the implications of any future development on village infrastructure and amenities, it is the duty of service providers to ensure that demands are met, as and when they arise. The Council has stated that it would consider using Section 106 planning obligations to secure new or enhanced community facilities.

14.4.6 The objectors contend that the Council's ADR assessment matrix is seriously flawed. I have addressed the criticisms of that methodology elsewhere in my report. Whilst the Council's comprehensive study of potential ADR sites was undertaken prior to the publication of PPG3 and PPG13, and before the adoption of the WCSP, I am satisfied that the criteria employed adequately reflect the recommendations of the BDLP Inspector. For his part, the previous Inspector anticipated to a very large extent the changing direction of planning policy guidance. Given the degree of compliance with national policy and a reduced need for ADR land, I consider there is no requirement to re-examine these matters here. I shall confine my attention to site-specific issues.

14.4.7 Particular concern has been expressed about the implications of traffic noise on any future development of the site due to the proximity of the M42 motorway. I accept that this could be an issue, even though the Council has stated that the land lies within the 'noise shadow' of the motorway and the Environmental Health Department has raised no objection in principle to ADR designation. However, no technical evidence has been supplied which would present a significant challenge to the principle of ADR designation. I consider that noise nuisance, like other concerns including air pollution and the visibility of part of the site from the motorway are matters that would need to be thoroughly addressed at planning brief/planning application stages. In respect of density and access, these are matters of a detailed nature. I note that the Highway Authority has not raised any objection to the designation of this site on the basis of access being provided through existing development. The Council has stated that there are no known wildlife features or ecological issues of significance connected with this site.

14.4.8 An objector has identified other sites which are considered to provide a more suitable supply of safeguarded land in another secondary settlement - namely,

Brake Lane, Hagley and land south of Kidderminster Road, Hagley. Each of those potential ADR sites is assessed on its own merits elsewhere in my report. The conclusions I reach on those sites have no direct bearing on Policy ALVE6 which I endorse as a suitable ADR site in view of its limited Green Belt functions, physical containment, sustainability and generally unconstrained nature.

Recommendations

14.4.9 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD5.

(c) That no further modifications be made to the Plan in respect of these objections.

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14.5 Policy ALVE7 – Areas of Development Restraint [Proposed Modification No AREA/MOD6]

86/1002	The Hagley Estate
58/1017	Messrs Grinnell, Wild, McIntyre & Johnson
87/1017	Messrs Grinnell, Wild, McIntyre & Johnson
79/1023	Alvechurch Village Society
969/1381	Billingham & Kite Ltd
1001/1385	Stansgate Planning Consultants (various clients)
1039/1387	Bellway Estates
63/1019	Mr & Mrs Rachman

Key Issues

(1) Whether Alvechurch is an appropriate settlement in which to make some ADR provision.

(2) Whether the objection site should be identified as an ADR and excluded from the Green Belt.

(3) Whether land east of Callow Hill Road, Alvechurch should be substituted for ALVE7 (and ALVE8).

(4) Whether the site is unsuitable for residential development because of motorway noise.

(5) Whether the site should be enlarged on its northern side to include land extending to the M42 motorway.

(6) Whether any future development should be restricted to low density.

Inspector's Appraisal and Conclusions

14.5.1 **Issue 1:** Alvechurch is a relatively large, compact settlement with a railway station and a reasonable range of local services. In 1991 it had a population of 3317. In recognition of its size, character and sustainability the BDLP Inspector recommended that it be inset from the Green Belt and considered as a suitable location for longer-term development.

14.5.2 Sustainability was one of the key elements referred to by the BDLP Inspector when looking at ADR provision. He indicated: "Within Bromsgrove District these concerns for 'sustainability' would in my opinion point towards consideration of ADRs, firstly, at or adjacent to Bromsgrove town, and, secondly, at locations which are close to both local facilities and rail links to the conurbation, such as Hagley, Alvechurch, Barnt Green and Wythall." The WCSP EiP Panel report later endorsed that position, with the development strategy advocating a sequential approach to the location of new development, following on from the guidance in PPG3.

14.5.3 The Council's District-wide study of potential ADR sites does not make direct reference to either PPG3 or PPG13, with its survey work pre-dating that guidance. Nevertheless, apart from the promotion of mixed use development, it does reflect the main principles of sustainability. The Council's approach has been to make modest ADR provision in each of the most sustainable settlements outside Bromsgrove, broadly proportional to their size and range of local facilities - that is, at Alvechurch, Barnt Green, Hagley and Wythall. While I have found Hagley to be deserving of a slightly greater share of future development than the other secondary settlements, I do support in general terms the overall distribution of safeguarded land promoted by the Council.

14.5.4 Alvechurch, like most other settlements in the District outside Bromsgrove, has an established pattern of out-commuting to Birmingham and the surrounding area both for work, with about 80% of the working population employed elsewhere, and for higher order services such as larger shops and secondary schools. I note that only 2.7% of the village's working population currently use the railway and a further 4.8% the bus services. This may reflect in part a lack of facilities at the railway station and the convenience of motorway access at junction 2 of the M42. However, the important thing in my view is the potential for securing a modal shift to public transport, particularly rail travel, in the longer term. Rail services from Alvechurch to Birmingham and Redditch are very frequent and the station is reasonably accessible to most occupants of the village. If station facilities were to be improved, and secure car and cycle parking provided, I believe there is every

prospect that residents would make much greater use of the public transport available and that car-borne commuting would decrease. Consequently, I consider that from a sustainability point of view, Alvechurch is well placed to accept a modest amount of longer-term growth.

14.5.5 Alvechurch Village Society would prefer the settlement to remain washed over by the Green Belt and the Council-promoted ADRs omitted. The Society maintains that village infrastructure and amenities are not sufficient to cater for additional housing, pointing to the fact that the 2 village schools are currently at capacity. However, safeguarded land is, by definition, land earmarked for longer term development. On current information, it is unlikely that any ADR land will be needed until near the end of the next Plan period. Consequently, there would be sufficient lead time for service providers to rectify any inadequacies and plan for the future growth anticipated. Moreover, the Council points out that a contribution towards any new or enhanced community facilities required as a direct result of the development itself would normally be sought from the developers under S106 of the Town and Country Planning Act 1990 at planning application stage.

14.5.6 As regards the concern that this is the thin end of the wedge leading to further development in the direction of the M42 and the by-pass, and encroachment towards Birmingham and Redditch, I have little worry on that score. The whole purpose of the current planning exercise is to accommodate future growth in a sustainable manner and to set new realistic Green Belt boundaries that will endure for many years to come.

14.5.7 I conclude that Alvechurch is a sustainable settlement that is suitable to accommodate a limited amount of additional development over the longer term.

14.5.8 **Issue 2:** Turning now to look at ALVE7 specifically, this is one of 3 ADRs identified by the Council at Alvechurch. Together these total 5.3ha. I have, in addition, recommended elsewhere in my report that a further 2.4ha of safeguarded land be identified at the former Alvechurch Brickworks.

14.5.9 The objection site comprises a 1.1ha parcel of land to the east of Birmingham Road and north of Old Rectory Lane, on the north-eastern side of the settlement. Although it lies within an area of 'confirmed' Green Belt the BDLP Inspector recognised the inevitability of some of that land having to be placed within the village inset.

14.5.10 From a Green Belt point of view, its principal purpose is to assist in safeguarding the countryside from encroachment. Like the BDLP Inspector, I accept that some degree of encroachment is unavoidable with most 'greenfield' ADRs. This parcel of land has clear and readily recognisable boundaries of field margins, with a tree-lined hedgerow and small stream running along the eastern side that satisfies the guidance in Paragraph 2.9 of PPG2. When considered in conjunction with

ALVE8, I acknowledge that the site has a somewhat restricted depth relative to its main road frontage. It reflects the nature and limits of existing residential development along sections of Birmingham Road and Old Rectory Lane. I do not, however, believe there would be any perception of 'unrestricted sprawl', as claimed by Stansgate Planning Consultants. I note and concur with the BDLP Inspector's conclusion in respect of this land: "Although not quite as well related to the existing development as Site A (ALVE8), Site P's (ALVE7) allocation would, in the context of the need for some land, not be materially harmful to Green Belt purposes."

14.5.11 As regards its sustainability, the objection site is situated relatively close to the village centre which has a range of local facilities. It is located on the main Birmingham Road. This is a bus route with fairly frequent services. The site is within the 5 minute drive isochrone of Alvechurch railway station, and within a 15 minute cycle ride (although research carried out in 1995 for the DoE shows that this mode of travel represents only a small percentage of the total). It is slightly closer, distance-wise, on foot at about 1.5km. While this is beyond the 800m advocated as being within 'easy' walking distance in 'Planning for Sustainable Development: Towards a Better Practice', it is not in my view excessive. PPG13 recognises at Paragraph 75 that walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km.

14.5.12 Stansgate Planning Consultants, representing various clients, have made a number of criticisms of the matrix used by the Council in its ADR study and revealed to this inquiry through Background Paper 2. In relation to ALVE7 (and ALVE8) the concerns are firstly, that sites were ranked within settlements rather than compared with each other on a District-wide basis; secondly, that none of the Alvechurch sites were scored in terms of agricultural land classification, thereby distorting the results; and thirdly, that in considering the travel time/distance for cyclists between ALVE7 (and ALVE8) and the railway station no account was taken of local topography, the nature of the approach roads and the lack of cycle parking facilities.

14.5.13 I have addressed elsewhere in my report criticisms of this sort. They mean that only limited weight can be placed on the numerical scores achieved. In fairness though, the Council has admitted errors and omissions and explained that it employed the matrix as a first sieve only with selections based, ultimately, on a variety of sources of information. As regards the first of the 3 criticisms I accept the Council's response that if potential ADR sites had been ranked on a District-wide rather than settlement basis, all provision would have been directed to Bromsgrove as the largest and most sustainable settlement.

14.5.14 I conclude that Alvechurch is an appropriate settlement in which to make some limited provision for safeguarded land, and that the objection site, ALVE7, is

suitable as an ADR. It has no significant constraints that would inhibit future development.

14.5.15 **Issue 3:** *(Land east of Callow Hill Road, Alvechurch)* Messrs Grinnell, Wild, McIntyre and Johnson accept and promote Alvechuch as an appropriate location for ADR designation but maintain that there are alternative sites available which would have less impact on the settlement and, in particular, the surrounding Green Belt. They argue that the Council's ADR study was defective and that the Alvechurch Inset Map should be modified to exclude ALVE7 (and ALVE8) and include instead, 2.9 ha at Callow Hill Road (East).

14.5.16 Looking at the criticisms levelled at ALVE7 (and ALVE8), I have already concluded at Paragraph 14.5.10 above that the boundaries of the site, which would form the new Green Belt limits, are reasonably defensible.

14.5.17 ALVE7 does indeed lie to the east of Birmingham Road, whereas much of the remainder of Alvechurch is contained to the west. However, this is of little significance in itself. Rather than being poorly related to the settlement, as claimed by the objectors, an ADR here would help to correct the offset nature of the village centre and bring more dwellings within easy walking distance of community facilities. It would not simply repeat the linear development that has taken place along Birmingham Road, the main village approach route, but together with ALVE8 would, in my opinion, serve to infill and round off the settlement by building on the cluster of dwellings that already exist at the junction with Old Rectory Lane. I believe it would neither harm the rural setting of the village nor significantly encroach into the surrounding countryside.

14.5.18 The land is of Grades 3a and 3b agricultural quality which, in terms of Bromsgrove District, is nothing remarkable. The objectors' argument that because the fields are flat and of reasonable scale they would provide a useful adjunct to surrounding agricultural operations carries little weight.

14.5.19 Turning now to the claimed advantages of the site at Callow Hill Road (East), I acknowledge that it is bounded by the M42 motorway to the north, the Worcester-Birmingham Canal to the south and east, and Callow Hill Road to the west. These would form strong and defensible Green Belt boundaries. The objectors contend that the site is not valuable in terms of fulfilling a countryside function because there are restricted views into the site and transport infrastructure impinges upon the land. Moreover, it is not accessible to the public and is not agriculturally productive despite there being a large utilitarian building in existence.

14.5.20 I cannot accept the force of these arguments. The site is located beyond the limits of the Worcester-Birmingham Canal. That waterway has been used by the Council as a barrier to resist the incremental expansion of Alvechurch in a north-westerly direction. In my view the objection site fulfils the very important Green

Belt function of safeguarding this vulnerable stretch of countryside from encroachment. To allow development to jump the Canal into an area which is generally devoid of any significant development, without adequate justification, would be quite unacceptable. Moreover, an ADR in this elevated location would be particularly intrusive when seen from the adjacent well-used Canal and its towpath and, at greater distance, from locations to the south and west. As regards the agricultural quality of the land, this is similar to that of both ALVE7 and ALVE8 and is therefore a neutral point.

14.5.21 The Council has drawn my attention to firm proposals to enlarge the nearby Conservation Area. It would include land adjacent to the objection site, extending for some 300m along its eastern boundary. While not necessarily precluding ADR designation, the setting of that Conservation Area could be adversely affected. It adds to my conviction that this is not a suitable site for future development.

14.5.22 As regards the sustainability of the objection site, it is situated further from the centre of the village than ALVE7 (and ALVE8) and there is no bus service along Callow Hill Road. It is therefore rather less sustainable overall. Finally, I note that there is some dispute as to the extent to which access to the site is constrained. This could conceivably limit the extent of development.

14.5.23 When compared with the merits of the Council-promoted sites in Alvechurch, I believe the disadvantages of the objection site stand out. I conclude that ALVE 7 (and ALVE8) is appropriately identified as an ADR and that the objection site should not be substituted.

14.5.24 **Issue 4:** Billingham and Kite Ltd contend that the objection site is environmentally unsuitable for residential development because it is subject to intrusive motorway noise from the M42. However, no technical evidence has been tendered by the objector in support of that argument, nor by the Council in rebuttal. I must therefore make a subjective judgement.

14.5.25 The land does not adjoin the motorway, which rises along this section to cross Birmingham Road, but is separated from it by a large field and a residential property. As the Council concedes, there will inevitably be a degree of background traffic noise audible on the site. However, I accept that this is not an uncommon feature of residential areas and can, to some extent, be mitigated by careful layout and design consideration. Given the attenuating effects of distance I do not see traffic noise as a major constraint to development in this location. It is certainly not of sufficient concern to rule out this site as an ADR.

14.5.26 **Issue 5:** *(North side of ALVE7)* The objection site comprises 1.9ha of rough pasture sandwiched between the northern boundary of ALVE7 and an area of scrub vegetation alongside the embanked M42. It is crossed by a public footpath. The site extends backwards from Birmingham Road, from where it is clearly

visible, to a much greater depth than the adjoining Council-promoted ADR and includes the curtilage of a single detached dwelling outside the objector's control. A gentle rounded landform runs north-south through the centre of the site. Only the western-most section of the land, 0.8ha in extent (incorporating 0.1ha of planting), is proposed as an ADR with the remainder staying in the Green Belt with potential for informal open space. Planning permission has been granted in the past for use of this and adjoining land as playing fields with changing and meeting room facilities.

14.5.27 Examining first the Green Belt implications, this site shares some of the characteristics of ALVE7 and ALVE8. Its main Green Belt purpose is in safeguarding the countryside from encroachment. However, unlike those adjacent sites the eastern boundary is not clearly defined by a stream or other recognisable feature of the kind set out in Paragraph 2.9 of PPG2, but is entirely arbitrary. It would be necessary to form a new Green Belt boundary by woodland or hedge planting between landscape datum points over a distance of 100m or so. The objectors argue that this slight disadvantage is outweighed by the considerable benefits of rounding-off the northern edge of Alvechurch to the logical boundary of the M42.

14.5.28 That is not the way I assess the proposal. The lack of a clear and defensible eastern boundary is a significant drawback. I am sure there would be pressure for further development to the east resulting in urban sprawl. The fact that planning permission has previously been granted here for formal recreational use carries little weight since essential facilities for outdoor sport and recreation are not considered inappropriate in the Green Belt. In any event, I note that the approved buildings were located on land to the north of the M42 and involved the reconstruction of existing farm buildings/stables.

14.5.29 As regards the other issues raised, it is necessary to identify the best possible sites as ADRs. The objection site is within the 5 minute drive isochrone of Alvechurch railway station and in reasonable proximity to the village centre, and is not subject to any built heritage or biodiversity designations that would act as constraints. But it performs slightly less well in some of those areas than ALVE7 (or ALVE8). Moreover, it would bring dwellings in closer proximity to a source of traffic noise. Rather than extending built development up to the M42 it would be far better in my view to retain a buffer of agricultural land or other open space in this key location to provide noise attenuation and to maintain an attractive countryside setting at this main entrance to the village.

14.5.30 I see no parallel with the situation at ALVE6. That ADR was supported by the BDLP Inspector because the land is bordered on 2 sides by housing. The M42 was selected as the most appropriate Green Belt boundary in light of the fact that it is situated so close to existing development.

14.5.31 While the objector draws attention to the benefits of new open space provision, I note that Alvechurch is already well-served by public open space. Any requirement arising from the development itself should be capable of accommodation within the ADR. That is one of the reasons why a gross figure of just 20dph has been assumed.

14.5.32 In summary, I consider this site to be inferior to ALVE 7 (and ALVE8). In my judgement there is no overriding need to identify additional areas of safeguarded land in Alvechurch over and above those already promoted by the Council and supplemented by the former Brickworks site. In particular, I see no justification for extending ALVE7.

14.5.33 **Issue 6:** While important to the objectors, matters relating to density and plot coverage are detailed considerations. They are more appropriately dealt with at planning application stage or as part of a planning brief. That will not occur until such time as the land has been allocated for development in a subsequent Plan. While the Council will need to take account of planning policy guidance then in force it will also no doubt have regard to the character of existing development. Beyond that, it is inappropriate for me to make further comment.

Recommendations

14.5.34 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD6.

(b) That no further modifications be made to the Plan in respect of these objections.

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14.6 Policy ALVE8 – Areas of Development Restraint [Proposed Modification No AREA/MOD7]

88/1017	Messrs Grinnell, Wild, McIntyre & Johnson
80/1023	Alvechurch Village Society
90/1028	Alvechurch & Hopwood Cricket Club
970/1381	Billingham & Kite Ltd
1002/1385	Stansgate Planning Consultants (various clients)
59/1408	Bishop Properties Ltd

Key Issues

14.6.1 (1) Whether the objection site should be identified as an ADR and excluded from the Green Belt.

(2) Whether land east of Callow Hill Road, Alvechurch should be substituted as an ADR for ALVE8 (and ALVE7).

(3) Whether designation of an ADR would adversely affect the use and viability of Alvechurch and Hopwood Cricket Club grounds.

(4) Whether the site would be unsuitable as an ADR because of motorway noise.

(5) Whether satisfactory vehicular access can be gained to the site.

(6) Whether land west of Callow Hill Road, Alvechurch should be substituted for ALVE8 (and ALVE7)

Inspector's Appraisal and Conclusions

14.6.2 **General:** ALVE8 comprises 2.8ha of pasture lying to the south of Old Rectory Lane on the east side of Birmingham Road, Alvechurch. Although somewhat larger in area than ALVE7 (1.1ha) on the northern side of Old Rectory Lane, it shares many of the physical characteristics of that adjacent site. Some objectors have dealt jointly with both sites. In order to avoid unnecessary repetition I shall, where similar arguments apply, just summarise my conclusions and rely on the full assessment made in respect of ALVE7. Issues that are specific to ALVE8 will be addressed in greater detail.

14.6.3 **Issue 1:** Alvechurch is a sustainable settlement, located in a Transport Corridor close to the conurbation. It has a range of local facilities and offers a choice of modes of public transport making it suitable as a location for development in the longer term.

14.6.4 Designation of ALVE8 as an ADR would result in some limited encroachment into the surrounding countryside. That degree of encroachment would not be unacceptable, in my view, given the need to find suitable sites for incorporation in a new village inset. The BDLP Inspector recognised, as I do, the inevitability of having to use some areas of confirmed Green Belt. The land has reasonably well-defined and defensible limits appropriate as long-term Green Belt boundaries. It would not be the 'thin end of the wedge' feared by the Alvechurch Village Society and no precedent would be set for urban sprawl. Future development here would infill a gap between existing development and serve to round off the village. It would create a more balanced settlement structure while protecting its overall setting.

14.6.5 The site is slightly superior to ALVE7 in sustainability terms. It is situated fairly close to village services and facilities and within the 5 minute car and 15 minute cycle isochrones of Alvechurch railway station. There are no constraints to development of the land. Any local deficiencies in services and facilities can either be addressed before the land is allocated for development or as part of negotiations with developers at planning application stage. I conclude that ALVE8 should be taken out of the Green Belt and incorporated in the village inset as land safeguarded for longer-term development.

14.6.6 **Issue 2:** The alternative site proposed at Callow Hill Road (East) is, in my opinion, unsuitable as an ADR. Development of that land would seriously encroach into the surrounding countryside beyond the limits of the Worcester-Birmingham Canal. Not only is the site open to views from the well-used Canal and towpath but, being elevated in relation to the core of the village, is visible from further afield to the south and west. Development here would be unduly prominent and would be likely to adversely affect the setting of the Conservation Area extension proposed by the Council. In sustainability terms the site is further from village amenities and, unlike ALVE8, Callow Hill Road does not have the benefit of a bus service.

14.6.7 **Issue 3:** The Alvechurch and Hopwood Cricket Club ground adjoins ALVE8 to the south. The Club considers an ADR to be unsuitable in this location for several reasons - traffic congestion in the village with safety implications, the possibility of injury to residents from cricket balls going astray, and drainage problems caused by the adjoining land being at a higher level. The fear is expressed that as a result the Club might have to close or relocate.

14.6.8 The Council has indicated its intention of preparing development briefs for each of the ADR sites. That would be the appropriate time to address issues like site access arrangements, the general layout of the development, and the character and safety requirements of immediately adjoining land uses. As regards traffic congestion/safety, Alvechurch already has the benefit of the A441 by-pass. I note that no highway or drainage objections have been lodged by the relevant Council departments. These are matters to be addressed in detail at the planning application stage. I agree with the Council that while all of these are material considerations none are so compelling as to be likely to render development of the site unacceptable in principle or to threaten the future viability of the Cricket Club.

14.6.9 I am concerned here with the generic use of land. It would therefore be inappropriate for me to comment on the detailed protective measures and assurances sought by the Club in its letter of 22 May 2001.

14.6.10 **Issue 4:** ALVE8 is located a considerable distance from the M42 motorway which crosses Birmingham Road on an embankment to the north. It is separated by a cluster of houses at the junction of Birmingham Road and Old Rectory Lane,

by ALVE7, by a further residential property, and by an ADR omission site promoted by Bellway Estates. Consequently, noise emanating from traffic using the motorway is likely to be at a low ambient level. Any adverse effects could, I am sure, be mitigated by careful consideration of the layout and design of development at planning application stage. I am quite satisfied that development here would neither be ruled out in principle nor unduly constrained by the presence of the motorway.

14.6.11 **Issue 5:** Stansgate Planning Consultants maintain that access to the site might be constrained. They say that the presence of 2 mature oak trees within the wide grass-verged embankment at the northern and southern ends of the Birmingham Road frontage, together with a slight bend in the road, mean that the necessary visibility splays could be difficult to achieve. However, I am not aware that any objection has been raised in principle by the Highway Authority. The Birmingham Road frontage is an extensive one and no doubt presents a number of access possibilities. There is a 40mph speed limit in force along this highway. It might be appropriate to review this as and when the various ADRs in Alvechurch are released for development. This could well have a bearing on the visibility standards that are applied at the time. Consequently, it does not follow that satisfactory vehicular access to the site can only be achieved at the expense of the character of the area.

14.6.12 **Issue 6:** *(Land west of Callow Hill Road, Alvechurch)* A 2.1ha site at Callow Hill Road (West) is put forward by Bishop Properties Ltd as an alternative to ALVE8 (and ALVE7). The site lies within interim Green Belt and is currently used as pasture. It is contained by the M42 motorway to the north, the railway line to the west, the canal to the south and east and Callow Hill Road to the north-east.

14.6.13 In support of its identification as an ADR, somewhat similar arguments are advanced to those made in respect of land to the east of Callow Hill Road (see Issue 2 above, and Issue 3 - ALVE7 [Proposed Modification No AREA/MOD6]). Essentially, the site is said to have a very limited function in terms of safeguarding the countryside from encroachment because views of the land are highly restricted, its character is affected by transport infrastructure, it is not accessible to the public, and it is of little agricultural value being of relatively low quality and isolated from other farmland. Moreover, it is claimed that the site can be adequately and safely accessed, is sustainable in terms of public transport and has no overriding ecological, archaeological or historical interest.

14.6.14 The BDLP Inspector took the view that in this vicinity the motorway and the railway are more conspicuous features and effective visual barriers than the canal. He concluded that excluding this site from the Green Belt (and that to the east of Callow Hill Road) would not cause coalescence with settlements to the north-west or material encroachment into the countryside.

14.6.15 I am of a rather different opinion, recognising that the BDLP Inspector's assessment was made in the light of a search for considerably more ADR land than is now required. When compared with the merits of ALVE 8 (and ALVE7) I believe this site does not perform anywhere near as well. In this north-west sector of Alvechurch the canal forms a strong limiting feature to development, clearly delineating the urban area of the village from the countryside beyond and marking a distinct change in character. Jumping that barrier would cause development to encroach into open countryside and would be particularly noticeable to users of the canal and those walking and cycling on the towpath. It would also be likely to harm the setting of the Conservation Area extension that I am told is a firm proposal of the Council. As regards its sustainability, Callow Hill Road, unlike Birmingham Road, has no bus service. And access via Callow Hill Road is poor due to the narrow hump-back canal bridge. All of these factors lead me to conclude that this site is inferior to ALVE8 (and ALVE7) and should neither be designated as an ADR nor otherwise included in the Alvechurch Village Inset. Instead, the land should be confirmed as Green Belt.

Recommendations

14.6.16 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD7.

(b) That no further modifications be made to the Plan in respect of these objections.

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15. BARNT GREEN

15.1 Overview

15.1.1 While supporting Barnt Green as a sustainable secondary settlement appropriate for accommodating some longer-term growth, I find site BG5 (Twatling Road) to be unsuitable as an ADR. I recommend its deletion in favour of land at Kendal End Road. I reject other ADR proposals in the locality. Further minor modifications are recommended in respect of Policy BG4.

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15.2 Policy BG4 and Para 16.4 – Retention of Character of Area [Proposed Modifications Nos AREA/MOD9 and AREA/MOD10]

92/1013	Barnt Green Parish Council
93/1013	Barnt Green Parish Council
94/1013	Barnt Green Parish Council
422/1157	P W King
1029/1385	Stansgate Planning Consultants

Key Issues

15.2.1 (1) Whether an Inset Map showing the area to which the Policy relates has been omitted.

(2) Whether coverage of the Policy should be extended to other parts of the District.

(3) Whether the explanatory text should be altered to clarify that any new development should accord with the character and density of the area.

Inspector's Appraisal and Conclusions

15.2.2 **Issue 1**: There are two parts to these objections. Firstly, whether the boundary of Policy BG4 has been omitted from the AREA/MOD10 plan in the Schedule of Proposed Modifications. This has been admitted by the Council. Correction 15 addresses the matter and, if accepted, would lead to the conditional

withdrawal of this particular aspect of the objection. The second part relates to the Plan itself. The thrust of the objection is that the complete extent of the Policy designation should be shown on a single map rather than be divided between Proposals Map 1 and 3. This, in essence, is a cartographic issue. The Council acknowledges that the monochrome maps make identification unclear. In general terms, I am satisfied that the Policy area has been correctly illustrated in line with the BDLP Inspector's recommendation. However, in order to give a clearer indication of the extent of the Policy area, the scale of the Barnt Green inset map in the written statement ought I feel to be altered to 1:4000 or 1:5000.

15.2.3 **Issue 2:** The objector contends that a similar policy should apply to Hagley. That settlement also contains areas of larger houses built at lower densities that contribute to its historic character. I note the Council's intention, on the basis of the proposal to delete Policy S8A (which I have supported), to consider a more specific approach to moderating densities in selected parts of the District at Local Plan Review stage. I consider this to be an acceptable approach and one which will, in time, address the concerns of the objector.

15.2.4 **Issue 3**: The objectors argue that an amendment of the reasoned justification to indicate that any new development should accord with the character and density of its surroundings would improve the text. The Council considers such a minor rewording would have no effect on the aims or purposes of the Policy. It is important for Local Plan policies to be as clear as possible. Currently the phrase 'where appropriate' could be seen to introduce some ambiguity. I therefore believe there would be benefit from deleting this proviso. However, I do not consider that substitution of the word 'accord' for 'respect' is necessary, as it could prove unduly restrictive in individual circumstances.

Recommendations

15.2.5 (a) That the Plan be modified in accordance with Proposed Modifications AREA/MOD9 & AREA/MOD10 and Correction 15, subject to the following additional modifications:

(iii) the Barnt Green inset map be drawn to a scale of 1:4000 or 1:5000 to show a greater extent of Policy BG4.

(iv) the final sentence of the explanatory text in paragraph 16.4 be altered to read "New development will be required to respect the character and density of immediate surroundings."

(b) That no further modifications be made to the Plan in respect of these objections.

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15.3 Policy BG5 – Areas of Development Restraint [Proposed Modification No AREA/MOD11]

104/1002	The Hagley Estate
1279/1006	David Wilson Estates
107/1013	Barnt Green Parish Council
100/1031	G & G A M Strong
101/1032	Mr & Mrs M Terry
103/1033	Banner Homes
108/1035	I Wilson & Ms J Davis
109/1036	J N Clegg
111/1038	M & Ms L Gillespie
112/1039	Ms P & R Hatton
113/1040	Ms G R Ponting
114/1041	W G McLuskie
115/1042	P E Hebblethwaite
116/1043	H D James
117/1044	Mrs L Watson
118/1045	Mrs V A Morris
119/1046	Mr & Mrs B Nelson
121/1048	G Herbert
122/1049	Mrs M D Adkins
123/1050	P H Nunnerley
129/1052	S F Underwood
130/1053	J M Pashley
131/1054	A & Ms D Sanson
132/1055	Dr F J Pickworth
133/1056	Mr & Mrs G P Forrester
134/1057	Mr & Mrs J A Mousell
135/1058	J R Grant
136/1059	C W Cutler
137/1060	Lickey & Blackwell Parish Council
138/1061	D Bircumshaw
140/1062	P & J Wilkes
141/1063	J H Crossley
142/1064	R B Ashley
143/1065	Mr & Mrs A D Gilmour
151/1067	J D O'Reilly
967/1381	Billingham & Kite Ltd
1003/1385	Stansgate Planning Consultants (various clients)
1030/1385	Stansgate Planning Consultants
1244/1438	Professor R H R White
1245/1439	Mr J W Ferguson

Key Issues

15.3.1 (1) Whether Barnt Green is a suitable settlement to accommodate some ADR provision.

(2) Whether land off Twatling Road, Barnt Green should be designated as an ADR.

(3) Whether BG5 should be afforded a degree of priority in the release of ADR sites.

(4) Whether adequate infrastructure exists in Barnt Green village or can be provided.

(5) Whether land at Sandhills House, Sandhills Green would be more appropriate as an ADR.

(6) Whether land at Cofton Lake Road, Cofton Hackett would be more appropriate as an ADR.

(7) Whether land at Mearse Lane, Barnt Green would be more appropriate as an ADR.

(8) Whether land to the south of Fiery Hill, Barnt Green would be more appropriate as an ADR.

(9) Whether the boundary of BG5 is sufficiently clear on the plan accompanying Proposed Modification AREA/MOD11.

Inspector's Appraisal and Conclusions

15.3.2 **Issue 1:** In advising the Council on ADR provision the BDLP Inspector placed particular emphasis on sustainability. He recommended that sites be identified firstly, at or adjacent to Bromsgrove town and, secondly, at locations close to both local facilities and rail links to the conurbation. One of those named secondary settlements was Barnt Green. That general strategy was subsequently endorsed by the WCSP EiP Panel report and, following the guidance set out in PPG3, the Structure Plan advocates a sequential approach to the location of new development.

15.3.3 Barnt Green is a small, prosperous commuter settlement situated close to the conurbation, roughly equidistant from Alvechurch and Marlbrook/Catshill. In 1998 it had an estimated population of 5,604. The village has a range of local services and facilities including shops, primary school, bus services and railway station. Barnt Green is on the Redditch – Birmingham (New Street) – Lichfield railway line with services running every half hour and journey times taking some

25 minutes to Birmingham and 10-15 minutes to Redditch. Being located within a Transport Corridor where there is a choice of modes of transport it is, in my view, a sustainable settlement suitable in principle to accommodate a limited amount of longer-term development. I do not accept the argument made by some objectors that because of superior road and rail infrastructure ADR provision should be confined to Alvechurch.

15.3.4 **Issue 2:** Site BG5 lies on the western side of Barnt Green adjacent to a low density residential area where a substantial amount of plot subdivision and infilling has taken place in recent years. It comprises 7.8 ha of agricultural land in 3 fields on the east side of Twatling Road and north of Cherry Hill Road. The land abuts Pinfields Wood to the east where there is an open border. There are dwellings flanking the site to the north in Pinfield Drive, on the opposite side of Twatling Road, at the junction of Twatling Road and Cherry Hill Road, and further to the east along Cherry Hill Road. Part of the land is subject to restrictive covenants precluding its use for purposes other than agriculture or horticulture and preventing the erection of buildings in proximity to the boundary with houses in Pinfield Drive. However, because circumstances can change over time I do not regard this legal impediment as a crucial factor in my consideration of whether the site is suitable as an ADR. I note that appeals in respect of residential development of sections of the site were dismissed in 1971, 1979 and 1991.

15.3.5 Although a small part of BG5 at its northern end comprises 'white' land, the majority is confirmed Green Belt. Its main Green Belt purpose is to safeguard the countryside from encroachment. In fulfilling that function it also serves as a significant buffer of open farmland separating existing residential development from Pinfields Wood. This is a tract of ancient semi-natural woodland, well-used as a recreation area. It forms part of the larger Lickey Hills Country Park which is designated both as a Landscape Protection Area and an Area of Great Landscape Value.

15.3.6 The site is surrounded on 3 sides by established residential development and/or roads. On the remaining side the development would come up against the barrier of the Country Park, approximately 200m deep at this point. There would therefore be little likelihood of further encroachment into the Green Belt leading to urban sprawl. The new boundary of the Green Belt would be clear and defensible and fully in accordance with the advice set out in Paragraph 2.9 of PPG2. As regards the merging of Barnt Green and Lickey, this has already taken place to a significant extent with development in existence along the entire western side of Twatling Road. The land has not been included within the Barnt Green Conservation Area.

15.3.7 Set against these considerations is the effect that development would have on landscape and nature conservation interests. This open farm land is visible from footpaths running close to the margins of Pinfields Wood, especially in winter, and to a greater extent from public viewpoints along Twatling Road and Cherry

Hill Road. In my judgement the land makes an important contribution to the overall character of the area and, most importantly, protects the setting of the Lickey Hills Country Park. Photographic evidence presented to the inquiry, confirmed and reinforced by my own observations, reveals that development approved by the Council and carried out further along Twatling Road has had an adverse effect on the character and appearance of the adjoining woodland. Not only did I see substantial and prominent buildings constructed very close to the woodland edge but there were also a variety of unsympathetic boundary treatments and instances of damage to trees. While development control issues such as these would not normally affect decisions about the generic use of land, I have little confidence that the situation would not be repeated. Such concerns have to be weighed in the balance with other material considerations.

15.3.8 As regards the effects on wildlife, I found the evidence given at the inquiry to be less convincing. I note that neither Worcestershire Wildlife Trust nor English Nature have objected to the designation of this site as an ADR.

15.3.9 Turning now to matters of sustainability, this site is within the 5 minute car and 15 minute cycling/walking isochrones of Barnt Green Railway Station. The closest part lies approximately 0.6-0.7km from the station and the furthest part some 1.2-1.3km. However, there is a steep uphill gradient encountered by those returning on foot from the village centre, particularly if the most direct route is taken along the unsurfaced and unlit footpath linking Fiery Hill Road with Cherry Hill Road. Moreover, there are neither footways nor street lights in Cherry Hill Road. These factors would I believe serve to discourage residents from walking and lead them to make greater use of the private car.

15.3.10 Having said that, there is very limited off-street car parking currently available in the centre of Barnt Green for shoppers and rail commuters. Policies BG2 and BG3 recognise this and seek improvements. In my opinion, residents from BG5 would be far more likely to undertake the whole of their journey to work (or elsewhere) by car, rather than using other more sustainable modes of transport. I note that the Highway Authority has not objected to BG5. Nevertheless, residents have drawn attention to the unsuitability of Twatling Road and other roads in the area linking to the M42 to accommodate any further increase in traffic without commensurate highway improvements.

15.3.11 Yet another concern is that densities in this part of Barnt Green are very low indeed (2.5-10 dwellings per hectare), creating a unique semi-rural character that is enhanced by mature woodland and open fields. Consequently, to ensure a reasonable degree of compatibility with what exists in the neighbourhood, and to accord with Policy BG4, it is probable that the development yield from BG5 would be quite modest. This would not sit comfortably with the advice in PPG3 that local planning authorities should avoid the inefficient use of land, should encourage housing development at between 30 and 50 dwellings per hectare net, and should promote mixed use development.

15.3.12 Looking at the situation in the round, I believe that this proposed ADR does not perform as well as might have been anticipated from the BDLP Inspector's endorsement - although this was given in the context of a greater need for safeguarded land. In my judgement, the alternative site put forward at Kendal End Road is superior to BG5 (see Issue 28 – Policy DS8 [DS/MOD12], Paragraphs 1.6.146-1.6.156). While there might be little to choose between them in terms of Green Belt function, the Kendal End Road site is in a more sustainable location. It is situated very close to Barnt Green Railway Station and village centre, giving residents a choice of public transport modes and allowing them to walk to local facilities. Moreover, it is capable of development to a higher density without compromising the character of its surroundings and allows the possibility of some mixed uses.

15.3.13 I have already concluded in response to Issue 1 above that Barnt Green is a suitable location for some ADR provision. But it does not have, in my view, the ability to comfortably accommodate more than a single ADR of the size proposed. With this in mind I recommend in favour of the Kendal End Road 'omission' site and against site BG5.

15.3.14 **Issue 3:** David Wilson Estates refer to the search sequence outlined in PPG3 and reflected in WCSP Policy SD.7, whereby the most sustainable housing sites should be allocated first. They argue that, on account of its sustainability characteristics, site BG5 should be afforded priority for release after those ADR sites on the periphery of Bromsgrove town.

15.3.15 I cannot accept such a proposition. All of the ADR sites promoted by the Council are, by definition, sustainable. They are located within a Transport Corridor defined by a 5 minute drive and 15 minute cycle/walk isochrone of a railway station. Moreover, they are distributed between a number of secondary settlements and not just Barnt Green. There is no reference in PPG2 to a hierarchy of ADRs. Safeguarded land merely provides a pool from which to select future allocations. The order in which sites are released and the quantity of land required is a matter for a Review of the Local Plan. To do otherwise would conflict with the 'plan, monitor and manage' approach. As the Council points out, factors affecting need can and frequently do change over time. In any event, I do not support site BG5 as an ADR.

15.3.16 **Issue 4:** Many objectors have drawn my attention to the amount of development that has occurred in Barnt Green over the last few years which has put a strain on local services and facilities. In the area around site BG5 some 200 dwellings have been constructed through infill development. Problems include a lack of off-street car parking for shoppers and commuters, a school that is operating at full capacity, medical services that are over-stretched, and storm water drainage difficulties in Fiery Hill Road. It is argued that the development of BG5 would exacerbate those and other worries.

15.3.17 ADRs are, by their very nature, longer-term proposals with a fairly generous time horizon. It is the responsibility of service providers to ensure that necessary infrastructure is in place at the appropriate time. This can be done either as part of a general programme of improvement works to cater for the anticipated expansion of the settlement, or in response to the release of a particular site. In the latter case, the Council would be able to seek a contribution from the developer under S106 of the Town and Country Planning Act 1990 at application stage where a need arises specifically from the development. Having said that, the cost to the community will often be lower the more sustainable the site. This is a further reason why I prefer the Kendal End Road site to that proposed by the Council.

15.3.18 **Issue 5:** *(Sandhills House, Sandhills Green)* Another alternative ADR has been put forward to replace BG5 at Sandhills Green on the south-eastern margins of Barnt Green. It is argued that unlike the Twatling Road site, which is located on the edge of an important landscape and recreation area, this proposal would safeguard the quality and character of the local environment while being equally sustainable.

15.3.19 I share the reservations expressed by the Council. This site and adjoining land fulfils 2 important Green Belt functions. It assists in safeguarding the countryside from encroachment and prevents neighbouring towns from merging into one another. Development here would project into the rural area surrounding Barnt Green and would increase the likelihood of future coalescence with Alvechurch to the south-east. That neighbouring settlement is separated by only a narrow band of open countryside which is already degraded by some sporadic development and the east-west line of the M42 motorway.

15.3.20 The railway line to the north of the proposed site forms a strong defensible boundary containing the urban area of Barnt Green. Being such a strong landscape feature, it represents in my view the most appropriate long-term Green Belt boundary. It contrasts markedly with the weakly defined southern edge of the alternative site promoted by the objectors.

15.3.21 Although located within the 5 minute car and 15 minute cycling/walking isochrones of Barnt Green railway station, and therefore by definition sustainable, I consider that the Green Belt disbenefits of this site comprehensively outweigh its advantages. I do not therefore support its designation as an ADR.

15.3.22 **Issue 6:** *(Cofton Lake Road, Cofton Hackett)* Banner Homes contend that Barnt Green is an unsustainable location that is inappropriate for further peripheral residential development. Instead, it is argued that areas closer to the Birmingham conurbation within walking distance of employment and shopping facilities should be selected for expansion, in accordance with PPG3 principles. A site at Cofton Lake Road, Cofton Hackett is promoted in substitution for BG5.

15.3.23 This alternative site was considered by the BDLP Inspector. In looking at its Green Belt function he commented: "One of the most important purposes of the West Midlands Green Belt is to prevent the incremental southwards expansion of the conurbation. I am firmly of the view that to allow a piecemeal addition to Cofton Hackett so close to the edge of the major urban area would be contrary to this vital Green Belt purpose." I concur entirely with those sentiments. An ADR in such a sensitive location on the very edge of the conurbation would result in unsatisfactory urban sprawl. In contrast, limited provision at Barnt Green would be likely to have a far smaller impact on the visual integrity and openness of the Green Belt.

15.3.24 As regards the sustainability of the Cofton Lake Road site, I note that it is just within the 5 minute drive isochrone of a railway station but beyond a 15 minute walking time. In terms of the criteria employed by the Council this makes it less sustainable than BG5 and other sites promoted by objectors at Barnt Green.

15.3.25 Notwithstanding its proximity to the conurbation's employment and shopping facilities, it is the Green Belt concern that is paramount here and which leads me to conclude that this alternative site at Cofton Hackett is unsuitable for safeguarding for longer-term development.

15.3.26 **Issue 7:** Some objectors have queried why land off Twatling Road has been identified as an ADR while other equivalent land at Mearse Lane has not been selected. I accept the Council's explanation. ADR provision at Mearse Lane, particularly on its western side, would not only encroach into the open countryside but would erode the very narrow gap that exists between Barnt Green and Marlbrook, contributing to their eventual coalescence. Furthermore, being located at a greater distance from a railway station, land at Mearse Lane is less sustainable than other Barnt Green options.

15.3.27 **Issue 8:** *(Land south of Fiery Hill Road, Barnt Green)* Several objectors suggest that land off Fiery Hill, Barnt Green, extending between the present developed area and the railway line, should be designated as an ADR because it is of at least equal standing to land at Twatling Road.

15.3.28 In considering the possibility of ADR provision in this area the BDLP Inspector said "…it is necessary to exercise extreme caution in relation to any proposals which could lead to further incremental, southern extension of the development boundary of Barnt Green." I endorse that note of caution. Land sandwiched between properties fronting Fiery Hill Road and the railway line forms an important visual gap between the southern built-up area of Barnt Green and the M42 motorway. Any encroachment of development into this area of open countryside would contribute in a piecemeal way to the eventual coalescence of Barnt Green, Linthurst and Blackwell. That would be particularly damaging when seen from the M42. In contrast, such concerns do not apply to BG5, which is contained by residential development and woodland, nor to some of the other

ADR proposals put forward by objectors. I cannot therefore support these objections. (See also Issue 3 – Policy DS1 [Proposed Modification No DS/MOD5], Paragraphs 1.3.21-1.3.25)

15.3.29 **Issue 9:** It is argued that the plan accompanying Proposed Modification AREA/MOD11 does not clearly define the extent of the proposed ADR. In particular, it is not obvious whether it only relates to the larger field or also includes the smaller fields to the north. The Council accepts this criticism and has proposed a Correction (No 16), which clarifies that site BG5 relates to all 3 fields. Stansgate Planning Consultants have conditionally withdrawn their objection on that basis. However, since I do not recommend BG5 as an ADR it would be inappropriate to follow this through.

Recommendations

15.3.30 (a) That Proposed Modification AREA/MOD11 be not made.

(b) That no further modifications be made to the Plan in respect of these objections.

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16. BEOLEY

16.1 Overview

16.1.1 I support the designation of an ADR at Ravensbank Drive, Beoley to serve the employment needs of Redditch.

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16.2 Policy BE3 – Areas of Development Restraint [Proposed Modifications Nos AREA/MOD15 and AREA/MOD16]

1005/1385 Stansgate Planning Consultants (various clients)

Key Issue

16.2.1 Whether there is sufficient justification to designate land at Ravensbank Drive, Beoley/Redditch as an ADR and to exclude the site from the Green Belt and Landscape Protection Area.

Inspector's Appraisal and Conclusions

16.2.2 The objectors question the need to designate a 10.3ha ADR in this location for employment related purposes when adjoining land allocated through Policy E2 remains vacant. I note that at October 2000 approximately half of that 30ha site was still available.

16.2.4 This issue was comprehensively addressed by the BDLP Inspector. It was on his recommendation that the Council has proposed an ADR at this site. He concluded that although some of the Policy E2 employment allocation does remain vacant, it would be "prudent to allow a moderate ADR, to provide a reserve for possible use if a definite need for more employment land for Redditch is clearly established". The objectors believe that the intention of the BDLP Inspector was that once the requirement of need had been established it would then become sensible to designate the site as an ADR. I interpret the sentence somewhat differently. In my opinion he was indicating that while a definite need must be proven for the site to be allocated for employment use, to reserve this land now for the

possibility of such use in the longer-term would be wise. That view accords with my own assessment.

16.2.5 The principle of Bromsgrove District supplying a certain amount of employment land for the needs of Redditch has been established for some time. In the Secretary of State's Notice of Approval of the HWCSP in 1990 the need for identification of a prime site outside the Borough boundary was accepted. It was, however, felt to be vitally important that Redditch Borough Council continued to explore industrial site options within its own administrative area. It was stressed that future requirements outside those boundaries should only be considered when all options, including Green Belt options, within the Borough's own boundaries had been fully explored. The recently adopted WCSP takes this matter forward. Policy D.19 indicates that the amount of land to be provided for employment uses within Classes B1, B2 and B8 will be: "about 55 hectares in Bromsgrove District, not including that required to meet some of the needs of Redditch District" and "about 65 hectares to meet the needs of Redditch District, some of which is to be provided in Bromsgrove District".

16.2.6 I am told that WCC has assured BDC that the BDLPPM Policy E2 employment allocation ought to be sufficient to provide for Redditch's employment needs to at least 2011. Consequently, the ADR proposed at Ravensbank would be available, if required, to meet any need arising between about 2011 and 2021. Whether the land is actually released for development within this timescale would be a matter for the Local Plan Review in light of circumstances then prevailing.

16.2.7 The objectors are concerned that an employment-related ADR in this location could lead to increased pressure for more greenfield development of adjacent land. The land specifically referred to by the objector is outside the area administered by Bromsgrove District Council. However, by designating land as an ADR it is the intention to safeguard Green Belt boundaries beyond the Plan period until 2021. Such a policy presumption should, if anything, reduce pressure on the surrounding land.

16.2.8 I concur with BDC that this particular site is the most suitable option for development in the locality. The land is well-related to the existing employment zone, comprises lower ground close to the edge of the main built-up area, and consists of interim Green Belt where boundaries remain to be confirmed. While any future development here would inevitably lead to some encroachment into the surrounding countryside and would result in a degree of urban sprawl of Redditch, I consider these impacts to be limited due to the relative size and location of this site.

16.2.9 The land lies within an area that was shown under Policy C1 of the deposit BDLP as a Landscape Protection Area on the basis that it formed an important element of either local or regional landscape importance. The previous Inspector considered this matter. He came to the conclusion that: "As far as the now

proposed ADR is concerned, it appears to me that it is just outside the area which is intrinsically worthy of inclusion in the LPA. It was not unreasonable to include it in the LPA in the deposit BDLP, as a matter of convenience and sensible administration. If it is now to be given a separate notation as an ADR, it would be equally sensible to adjust the boundary of the LPA to exclude it." I take a similar view.

16.2.10 The objectors contend that future development of this site could have a harmful impact on the setting of the nearby Gorcott Hall and its outbuildings, a Grade II* listed building. I note, however, that neither English Heritage nor Stratford-on-Avon District Council, within which administrative boundary it falls, have raised objections. Moreover, there exists a small but densely wooded area in between to provide screening and a physical barrier. Any potential impact on the integrity of this important listed building would be a matter for detailed consideration at development brief/planning application stage. It does not, I feel, affect the principle of ADR designation.

16.2.11 I therefore endorse the Council's proposal to identify this site as an ADR, excluding it from the Green Belt and Landscape Protection Area. However, it appears to me that an error has been made on Proposals Map 1 in the annotation of employment land south of Beoley as E3 rather than E2. This should be corrected to establish conformity between the Proposals Map and the written statement.

Recommendations

16.2.12 (a) That the Plan be modified in accordance with Proposed Modifications AREA/MOD15 and AREA/MOD16.

(d) That Proposals Map 1 be altered in relation to the annotation of E3 to conform with the written statement which correctly states E2.

(e) That no further modifications be made to the Plan in respect of this objection.

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17. BROMSGROVE

17.1 Overview

17.1.1 I support a concentration of ADR provision in and around Bromsgrove town, in recognition of its primacy in the District and its degree of sustainability. However, I do not favour all of the sites promoted by the Council. I conclude that BROM5 and BROM5B should be omitted. ADRs in those locations on the north and north-west margins of the town would erode the narrow Green Belt gap that separates Bromsgrove from Catshill-Marlbrook-Lickey End, the maintenance of which has been an object of planning policy for many years. By way of partial replacement I recommend that land west of Whitford Road be substituted. This would serve to redirect growth along an east-west axis rather than towards the Birmingham conurbation. The resultant reduction in ADR provision at Bromsgrove town, from 69.7% to 63.4%, would be made up by higher levels of development in some of the secondary settlements.

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17.2 Policy BROM4 – Residential Development Sites [Proposed Modification No AREA/MOD19]

1266/1382 Bryant Group

Key Issue

17.2.1 Whether land at Woodrow Lane, Catshill should be designated as an ADR.

Inspector's Appraisal and Conclusions

17.2.3 The Bryant Group is seeking a number of modifications to the BDLPPM. The primary objective is designation of land at Woodrow Lane, Catshill as an ADR under Policy DS8 - if further land is required to satisfy the District's needs. Consequential modifications comprise: the removal of all reference in Paragraph 21.4 to the northern extent of housing allocation BROM4 forming the boundary of Bromsgrove in this area; inclusion of this site within the schedule of ADRs at Appendix 3A; and amendments to the Proposals Map and Inset Map.

17.2.4 The objection site is located on the northern side of Catshill and extends to about 4.3ha. It is bounded by a large field to the north, Woodrow Lane to the west, the rear of residential properties fronting Birmingham Road/Halesowen Road to the east, and an area of recently developed housing to the south, formerly known as The Horsecourse (allocated under Policy BROM4 of the BDLPPM). The site is divided into 3 sections - the northerly one being a ploughed field, the central section used for horse grazing, and the southerly one divided by a hedgerow separating 2 residential properties set in large curtilages. The land dips westwards across the site and also to the south-west.

17.2.5 The objector argues that because Catshill comprises a satellite of the main urban area of Bromsgrove District, it is an appropriate location in which to make some ADR provision. The Council does not deny that in policy terms it regards Catshill, Lickey End and Marlbrook as part of greater Bromsgrove town where for sustainability reasons a majority of growth should be concentrated. However, its view is that there are better ADR sites available closer-in to the town that are more acceptable from Green Belt and sustainability perspectives. The site was recommended for consideration as a potential ADR by the BDLP Inspector but this was done in the context of a search for a much greater quantity of safeguarded land than is now proposed.

17.2.6 Looking first at the Green Belt implications, I agree with the BDLP Inspector and an earlier Inspector in 1991 that this site contributes to the twin purposes of safeguarding the countryside from encroachment and checking the unrestricted spread of large built-up areas. It does not play a major role in preventing neighbouring towns from merging into one another, unlike sites in more sensitive gaps such as, for instance, to the south of Catshill and at Lickey End.

17.2.7 As regards encroachment, the objector contends that since the BDLP Inspector reported there has been a material change in circumstances. Now that BROM 4 has been developed it is argued that the Woodrow Lane site falls much less in open countryside. While that is clearly a change, I do not regard it as particularly significant. All that it has done is to bring the objection site into physical contact with the northern edge of Catshill. The Council quite rightly points out that future building here would serve to extend the urban area further to the north, consolidating the more sporadic development on Woodrow Lane with the ribbon development fronting Birmingham Road/Halesowen Road. Such building works would in my judgement unacceptably encroach into the open countryside and set a precedent for further incursions onto adjacent farmland - eventually extending to the junction of Woodrow Lane and the A38. My fears in this regard are fuelled by the lack of a strong defensible Green Belt boundary to the site on its northern side.

17.2.8 The objector maintains that development of the land would not lead to urban sprawl, being largely contained by existing development and a pronounced ridgeline to the north. That is not the way I view the proposal. In my opinion,

this site has a much lower degree of containment than was the case with BROM4 which formed an obvious indent in the settlement boundary. I am in no doubt that a northerly extension onto the objection site would lead to urban sprawl. The harm thereby caused could not, in my judgement, be adequately addressed by additional landscaping along the northern perimeter.

17.2.9 Much of the site is elevated. Future development would I feel run the risk of breaching the skyline when viewed from the north, in contrast to most of Catshill that remains well-contained by landform. While that visual impact could be reduced by keeping buildings well away from the sensitive northern area, and by planting, it would be likely to significantly reduce the proportion of the site that can be developed.

17.2.10 I turn now to consider the sustainability implications. Catshill is situated outside a 5 minute drive isochrone of a railway station. It is, however, on a well-defined bus corridor with regular and frequent services to Birmingham (approximately 1 hour away) and Bromsgrove. The WCSP EiP Panel recognised that buses are an important element of public transport that should not be ignored. I accept that. But I also agree with the Council that in searching for the most sustainable ADRs the aim should be, wherever possible, to maximise the different travel options available. Consequently, if reasonable sites exist it is better to locate ADRs where they are closer to both rail and bus services, and ideally at interchanges between different transport modes.

17.2.11 The objection site does not offer a choice of public transport. While that does not necessarily preclude site selection - witness the ADR I have recommended elsewhere in my report at Church Road, Catshill - it does have to be weighed in the balance and set against Green Belt and other considerations.

17.2.12 Another element of sustainability is the range of local services and facilities that are available to residents. Catshill possesses a fairly wide variety and number, many of which can be accessed by walking or cycling using the SUSTRANS route. Indeed, facilities exceed those that might be expected under the Sustainable Settlements guide for a settlement of around 8,000 people. With the exception of primary and middle schools that are full, there are no overriding capacity issues. Further housing growth would help support the viability of some shops.

17.2.13 In summary, I find against this proposal primarily on Green Belt grounds. An ADR here would extend development northwards away from Catshill encroaching into the countryside, consolidating sporadic development between Woodrow Lane and the A38, and creating pressure for further incursions. Moreover, I consider this site to be somewhat less sustainable than other ADR options identified by the Council - even allowing for criticism that the western sector of Bromsgrove town falls outside the 5 minute drive isochrone of the railway station at peak times. I

conclude that the land should not be excluded from the Green Belt and should not be safeguarded for development in the longer term.

Recommendations

17.2.14 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD19.

(d) That no further modifications be made to the Plan in respect of this objection.

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17.3 Policy BROM5 – Areas of Development Restraint [Proposed Modification No AREA/MOD20]

170/1001	Dodford with Grafton Parish Council
164/1002	The Hagley Estate
165/1073	M & C G Banner
167/1074	The Bromsgrove Society
174/1075	Crest Nicholson Residential (Midlands) Ltd
175/1076	Secretary of State for Health
176/1077	Mrs J M Shephard
177/1077	Mrs J M Shephard
178/1078	Mrs V A Lees
971/1381	Billingham & Kite Ltd
1006/1385	Stansgate Planning Consultants (various clients)
1031/1385	Stansgate Planning Consultants
1040/1387	Bellway Estates
1046/1388	David Wilson Estates
1272/1388	David Wilson Homes (Western) Ltd
1053/1429	Westbury Homes (Holdings) Ltd
1065/1430	Persimmon Homes
1077/1432	Bovis Homes Ltd
1087/1433	Barratt West Midlands
1249/1443	The Mount School (Bromsgrove) Ltd
1250/1443	The Mount School (Bromsgrove) Ltd
1281/1455	Mason Richards Planning

Key Issues

17.3.1 (1) Whether large-scale development on the north-west flanks of Bromsgrove town would harm adjacent areas.

(2) Whether BROM5 is suitable as an ADR and should be excluded from the Green Belt.

(3) Whether traffic associated with the proposed ADR would be likely to cause unacceptable environmental and highway safety problems.

(4) The effect that a link road would have on the continued operation of The Mount School in terms of vehicular access, highway safety, congestion, noise and pollution.

(5) Whether BROM5 should be brought forward for development in advance of other ADRs.

(6) Whether the Green Belt boundary between Bromsgrove and Lickey End, in the vicinity of the A38, is appropriately drawn in the BDLPPM.

(7) Whether the boundary of the site is adequately defined in the Proposed Modifications.

Inspector's Appraisal and Conclusions

17.3.2 **Issue 1:** Dodford with Grafton Parish Council is concerned that the major long-term growth targeted for the north-west margins of Bromsgrove would cause excessive environmental damage to adjacent areas - in particular, the nearby Dodford Conservation Area and the Landscape Protection Area (LPA). If those ADR sites are not to be deleted the Parish Council asks that various protective measures be introduced. These comprise: Landscape Protection Area status for the hamlets of Worms Ash and Alfred's Well; specific exclusion of those hamlets from the application of Policy DS5 (limited housing infill); and implementation of special traffic calming measures in Dodford Conservation Area and surrounding hamlets.

17.3.4 The Council says that the ADR sites proposed around Bromsgrove town would almost certainly be released in a phased manner as part of the Local Plan Review. That process would, I agree, help to assimilate new development and allow the necessary additional infrastructure to be provided at the appropriate time. I do not, however, attach a great deal of weight to the block designation of BROM5, BROM5A, BROM5B and BROM5D in order to finance an improved road route around the northern and western perimeters of the town, linking Kidderminster Road with Stourbridge Road and Birmingham Road. That long-term possibility

has not yet been fully examined, nor has it been evaluated against alternative transport strategies.

17.3.5 I conclude later in my report, in response to other objections, that ADR sites BROM5 and BROM5B should be omitted in favour of development to the west of Bromsgrove town. If accepted, that recommendation would partially address the concerns of the Parish Council. It would reduce by some 16.3ha the total amount of ADR land assigned to Bromsgrove town (excluding its satellites) and would relocate future development away from the most sensitive north/north-west margins of the town, thereby reducing the potential impact on those neighbouring areas.

17.3.6 As regards the specific measures sought by the Parish Council, I see no reason why the Landscape Protection Area should be extended to included Worms Ash and Alfred's Well. That designation has been made in recognition of existing landscape quality. Fears about the impact of future development do not affect the landscape merits of those hamlets.

17.3.7 Policy DS5 sets out a list of those settlements where the HWCSP limited housing infill Policy H17(d) applies. Neither Worms Ash nor Alfred's Well appear in that list, although they are identified as Green Belt settlements in the schedule set out in Appendix 3. They are therefore already excluded from the application of that Policy without it being necessary to make any further modifications.

17.3.8 Finally, the traffic calming measures sought for Dodford Conservation Area and other hamlets do not require a specific policy base. They can be implemented by the Highway Authority as and when deemed necessary in the interests of highway safety.

17.3.9 **Issue 2:** I have already outlined what I consider to be an appropriate quantity and distribution of safeguarded land to meet the District's needs to about the year 2021. I accept that the majority of ADR provision should be made in or adjacent to Bromsgrove town, reflecting the size and importance of this principal settlement. By offering a choice of public transport modes and a wide range and number of higher order services and facilities, as well as accommodating much of the District's employment base, it is the most sustainable location in which to accommodate future growth. This is clearly recognised in both Regional Planning Guidance and in strategic guidance delivered through the earlier HWCSP and the new WCSP. Having established that point, it is necessary to identify the best possible ADR sites. This I do by assessing, in each case, Green Belt functions, sustainability credentials and site constraints/opportunities.

17.3.10 BROM5 consists of a parcel of 26.5ha of arable land on the northern side of Bromsgrove town at Barnsley Hall South and Norton Farm. It is flanked to the south and south-west by the Lowes Hill housing estate; to the north-west by residential redevelopment of the Barnsley Hall Hospital site, now nearing

completion; and to the east by ribbon development along Birmingham Road and the A38. The northern boundary is formed by the old Hospital service road leading from the A38 to the former Barnsley Hall site. Beyond that is open countryside stretching as far as Catshill, bisected by the east-west line of the M42 and its junction with the M5. The land falls in elevation generally from north to south with a knoll of higher land in the north-east sector. The land comprises interim Green Belt where Green Belt boundaries remain to be determined.

17.3.11 Looking first at Green Belt functions, it seems to me that this land fulfils two Green Belt purposes. It assists in safeguarding the countryside from encroachment and prevents neighbouring settlements from merging into one another. Examining these in turn, I accept that encroachment is common to most ADRs and there is little to distinguish this site from others. Now that the adjoining Barnsley Hall Hospital site has been redeveloped, the land is bounded on several sides by existing housing development. I note that it is intended to exclude the former Hospital site from the Green Belt, rather than treat it as a PPG2 Annex C 'Major Developed Site in the Green Belt' as recommended by the BDLP Inspector. This is logical in view of the extent of building works permitted, which exceed the footprint of the former structures, and its relationship with the urban area. As a result, the objection site now appears as a pronounced indent in the northern boundary of Bromsgrove town. Given these circumstances, an ADR here could be regarded as rounding off the settlement rather than causing encroachment.

17.3.12 Having said that, BROM5 does not perform well in relation to the second Green Belt function - that of preventing neighbouring settlements from merging. There are 2 elements to this. First of all, the very narrow gap between Bromsgrove town and the outlying village of Lickey End. The Council argues that since the BDLP Inspector reported in early 1997, when he found against this site, there has been a significant change in circumstances. Infill development and some redevelopment permitted within the curtilages of dwellings along Birmingham Road has progressively eroded the degree of separation and caused the two settlements to coalesce. A precedent has also been set for further development. That is not, however, the way I view the position. While there is undoubtedly a more intensive ribbon of development than before, Lickey End retains a separate identity and any physical linkage remains confined to a relatively narrow strip along the A38. The overall impression I obtained from the evidence presented to the inquiry and my site inspections is that Lickey End continues to be a separate village entity with a small number of local services, including a primary school and shop, rather than being part of Bromsgrove town. Even if some land on the northern and eastern sides of BROM5 was to be kept clear of development and used for recreation or similar purposes, development of the remainder of the site would substantially fill the gap, causing Lickey End to be absorbed into the Bromsgrove urban area.

17.3.13 The second element relates to the gap between Bromsgrove and Catshill where the countryside character of that land has already been adversely affected by the M42/M5 highway infrastructure. Although wider than the gap separating Bromsgrove from Lickey End, it is still a very small distance in Green Belt terms - just 420m or so at its narrowest point. I consider it absolutely vital that this land remains permanently open to separate Bromsgrove from other urban areas to the north. Piecemeal erosion of that gap would not only cause Catshill, Marlbrook and Lickey End to succumb over time to the expansion of Bromsgrove but would, to my mind, set a precedent for the merging of other towns and villages in the area. This would hasten the eventual coalescence of Bromsgrove and the City of Birmingham, thereby seriously damaging one of the most important purposes of the West Midlands Green Belt.

17.3.14 The Council and its various supporters argue that because BROM5 would bring development no closer to Catshill than the Barnsley Hall Hospital site there would be minimal impact on Green Belt purposes. I do not subscribe to that view. I concur with the BDLP Inspector who said: "I have serious reservations about the argument that as long as the width of the narrowest section of a vulnerable gap is not further reduced, the erosion of other parts of the gap is not significant." I agree with him that the gap needs to be looked at as a whole, and that loss of the Norton Farm site would undermine the gap's function in preserving a sense of clear physical separation between Catshill and Bromsgrove.

17.3.15 An appeal decision made in 1982 (Ref APP/5242/A/81/06080), decisions on 2 called-in planning applications made in 1993 (WMR/P/5242/223/15 and 16), and 2 appeal decisions made in 1993 (T/APP/P1805/A/93/225961/P2 and 228484/P2) have been referred to by various objectors. Together, they reinforce my commitment to maintaining this gap. In the 1982 decision the Inspector concluded: "….The shape, size and location of the land at Norton Farm suggest to me that its retention as open farmland is absolutely vital to the integrity and continuity of the approved Green Belt in this area. The basic aims of the Green Belt are to resist the spread of urbanisation and to prevent the coalescence of neighbouring settlements. I find the apprehension of the County Council and local residents to be well-founded and believe that this opposition to the present appeal is worthy of full support by the Secretary of State." I note that the Secretary of State accepted the Inspector's conclusions and dismissed the appeal, even though there was less than a 5 years supply of housing land subsisting.

17.3.16 The applications made by the West Midlands Regional Health Authority, refused on an interim basis in 1993, involved a more extensive development reaching to the M42, with various road links. However, the Inspector's conclusions in relation to the potential merging of Bromsgrove and Catshill are of some relevance. She said: "I consider that the proposals would advance the coalescence of Bromsgrove and Catshill…. The 'gap' between the northern edge of Bromsgrove and the southern edge of Catshill is about 1km. The proposed

developments would reduce it to some 227m…. Such a reduction would, in my opinion, greatly diminish the separating role of the 'gap' and its spatial quality."

17.3.17 The 1993 appeal decisions involved land at Dale Close/Rocky Lane, Catshill. In dismissing both appeals the Inspector said: "I consider development on this site would reduce still further the narrow gap remaining between Bromsgrove and Catshill. Consequently, I find it would cause harm to the objectives of the Green Belt."

17.3.18 Yet another factor supporting my conclusion on Green Belt grounds is the view expressed by the Secretary of State when giving his approval in June 1990 to the Hereford and Worcester Structure Plan Alterations (1986-2001). He stated: "… the future growth of Bromsgrove town should, in order to preserve the particularly narrow and vulnerable Green Belt gaps to the north and south of the town, generally be on an east/west axis." In my opinion, that guidance is as relevant today as it was then. Indeed, similar sentiments are echoed at Paragraph 8.3 of the BDLPPM, in support of Policy DS1.

17.3.19 I acknowledge the Secretary of State's use of the word 'generally', the absence of any objection from the County Council to BROM5, and the WCSP EiP Panel's refusal to comment on the strategic directions of growth at Bromsgrove when requested to do so by the Bromsgrove Society. Nevertheless, I consider the District Council's dogged determination to pursue BROM5 as an ADR to be ill-conceived. It flies in the face of the Secretary of State's guidance and the BDLP Inspector's very clear recommendation.

17.3.20 The Council says it has examined but rejected as part of the ADR search exercise the option of promoting ADRs to the east of Bromsgrove. It points out that such a strategy would extend development into particularly attractive countryside designated as a Landscape Protection Area and would cause encroachment into the Green Belt in an area where Green Belt boundaries are generally weak. Moreover, sites would be further away from the town centre with the added disadvantage of having to cross the barrier formed by the railway line. However, such arguments must be weighed against much more serious problems encountered elsewhere. In the case of BROM5, this means merging of the discrete settlements of Bromsgrove and Lickey End and harm caused to the narrow and vulnerable Green Belt gap between Bromsgrove and Catshill.

17.3.21 Finally, in relation to the Green Belt arguments I am surprised that the Council's ADR Study assessment matrix assigns a 'coalescence' score of zero to this site. Such an anomaly, alongside the many other criticisms made by objectors, must cast doubts on its usefulness as a sifting mechanism.

17.3.22 Turning now to matters of sustainability, BROM5 lies in a public transport corridor, being within the 5 minute drive and 15 minute cycling/walking times of Bromsgrove railway station defined in the Transport Corridors Study. In

addition, there are regular and frequent bus services along Birmingham and Stourbridge Roads offering a choice of public transport mode. The SUSTRAN cycle route is also largely in place and will run close to the site. Moreover, the land is within reasonable proximity of a wide range of services and facilities offered by Bromsgrove town centre and much of the District's employment is located in Bromsgrove town. Using these criteria, the Council considers this to be a sustainable location for future development and, in their terms, one of the best ADR sites available.

17.3.23 There are, however, some negatives. Firstly, the railway station is not situated in the town centre but is offset to the south-east, making it less accessible from BROM 5 and other proposed ADRs on the north/north-west margins of the town. Secondly, the railway station and rail service both require enhancement. Deficiencies include constraints on the line and infrequent services, short station platforms, poor bus access and inadequate car parking for commuters. While improvements are proposed through the Local Transport Plan for Worcestershire (2001-2006), the BDLPPM and other means, there is no certainty over the funding or timing of these. Thirdly, the main employment area of Aston Fields is on the opposite side of the town at greatest distance from BROM5. And fourthly, the proximity of the site to the motorway network could encourage greater car usage.

17.3.24 When these issues are factored into the equation BROM5 is not quite as sustainable a location as it first appears. I recognise, though, that there are drawbacks to most if not all of the potential ADR sites before me - both in Bromsgrove town and elsewhere. Looking at the wider picture I believe that, purely on grounds of sustainability, there is insufficient reason to reject BROM5.

17.3.25 The third main consideration comes under the heading of site constraints and opportunities. The topography of the land and its relationship with adjacent development along Birmingham Road impose limitations on the extent to which BROM5 can be developed. The Council accepts the desirability of keeping buildings well away from the northern boundary of the site. That boundary, following the former Hospital service road, coincides with a ridge of higher land which forms the edge of the shallow basin containing Bromsgrove town. Building works taken up to the site boundary would give the impression of development spilling over into open countryside. Such development would be visible from far afield and, by adversely affecting the setting of Bromsgrove town, would significantly harm the amenities of the area. There is, in addition, a pronounced knoll in the north-east corner of the site. To minimise the visual impact of development, particularly on the occupiers of Birmingham Road properties, that area of land would also have to be kept clear of buildings and used for, say, open space or recreation purposes. While the gross density assumption of 20 dwellings per hectare made by the Council in respect of safeguarded land contains a built-in allowance for constraints of this type, I believe the overall site yield would be rather less than originally envisaged. I agree with the BDLP

Inspector that even if development could be made less visible by means of landscaping and/or careful site planning, development would still be quite apparent from roads and footpaths in the area.

17.3.26 Another constraint is the quality of the agricultural land comprising the site. This is mainly Grade 1 with some Grade 3a in the south-east corner. However, Bromsgrove town is surrounded on most sides by land of similar quality. If safeguarded land in sufficient quantities is to be identified in the most sustainable locations the loss of some of the best and most versatile agricultural land is inevitable. This was clearly recognised and accepted by the BDLP Inspector in his report, and is compatible with the guidance given in Paragraph 2.17 of PPG7, updated in March 2001. In any event, I note that many ADR sites promoted elsewhere, such as Hagley, feature agricultural land of equal or very similar quality. Other sites of lower agricultural value suffer from greater disadvantages. Land at Ryefields Farm, Stoke Prior, for example, offers far less well-developed transport options.

17.3.27 On the other side of the equation are the opportunities presented by this ADR. The most obvious of these are a new school site to replace Lickey End School which is already operating at full capacity and has little scope for expansion, and a link road between the A38 and the B4091. I make specific comment on the latter in response to Issue 3 below.

17.3.28 Weighing up the various arguments made for and against the designation of this site as an ADR, I believe that BROM5 is not so unsustainable nor physically constrained as to be rejected on either of those grounds. However, I am seriously troubled by the Green Belt implications. The merging of Lickey End and Bromsgrove and a reduction in the area of open undeveloped land separating Catshill and Bromsgrove would, in my view, have substantial adverse effects on the function and integrity of this section of Green Belt. I conclude, on balance, that BROM5 should be deleted from the Plan and the site confirmed as Green Belt.

17.3.29 **Issue 3:** A number of objectors point to the considerable volume of traffic already using the A38 Birmingham Road and the B4091 Stourbridge Road in order to access the M42 and M5 motorway network. This has led to traffic congestion, particularly at peak periods, highway safety problems and low air quality at certain 'pollution hotspots' such as the Lickey End roundabout. Designation of BROM5 as an ADR would, they say, exacerbate these problems.

17.3.30 I have some sympathy with the views expressed. Although BROM5 is located within a public transport corridor it is not especially well-placed to deliver a modal shift away from the private car. As I have previously indicated, not only is it some distance from the railway station which is situated in the south-east sector of the town in the opposite direction from the conurbation but, most importantly, it is very conveniently positioned in relation to access to the Midlands motorway

network. In my opinion, not all of the sustainability benefits claimed for this site would, in practice, be delivered. Instead, it is likely that residents would make greater use of the private car.

17.3.31 The Council maintains that a particular advantage of BROM5 would be the opportunity to fund a link road between Birmingham Road and Stourbridge Road as part of a more extensive orbital route around the north and west sectors of Bromsgrove. That road might ultimately connect to the A38 south of the town to provide a westerly by-pass. This would, it is argued, bring substantial environmental benefits by reducing 'rat running' along residential streets, notably All Saints Road and Victoria Road in Bromsgrove town and Meadow Road, Golden Cross Lane and Barley Mow Lane in Catshill. It would also remove extraneous traffic from Bromsgrove town centre and provide improved links to the motorway system and railway station. It seems to me, though, that such a scheme could turn out to be counter-productive by encouraging even greater traffic flows feeding into areas and along arteries that are already heavily congested and polluted and by stimulating car-borne commuting. Moreover, it has not been established that such a link road could only be built in association with development of BROM5. Clearly, much work needs to be done to determine the most appropriate way forward. It should not, in my view, be allowed to unduly influence the selection of ADRs. Nor do I consider it appropriate for such a tentative proposal to be shown on the Proposals Map - not even as an indicative road line for illustrative purposes only.

17.3.32 **Issue 4:** Leading on from this, The Mount School is concerned that a new road link across BROM5 connecting Stourbridge Road and Birmingham Road close to the A38 junction would seriously harm the school environment and lead to highway safety problems. The school has 140 pupils between 2 years 9 months and 11 years of age and generates in the order of 600 vehicle movements per day between 0730 and 1800 hours. Fears have been expressed that development of BROM5 could lead to loss of the cut-off section of Birmingham Road located at the entrance to the school which is used for dropping off and collecting pupils, and the possibility that the school entrance would emerge straight onto a busy roundabout.

17.3.33 In response, the Council has provided preliminary layout drawings prepared by consultants acting on behalf of a potential developer. They show a proposal for staggered signal-controlled junctions between the A38 and the link road and between the link road and Birmingham Road as it exits the town. This 'solution' has been put forward in preference to a roundabout for safety and capacity reasons. In addition, 2 alternative suggestions have been made for providing future access to the School. These schemes retain much of the open land along the eastern frontage of the School premises and make specific provision for parking and vehicle manoeuvring. Although not yet approved by the Highway Authority, I am satisfied on the basis of those drawings that adequate vehicular

access can, in principle, be maintained to the School without prejudicing highway safety or causing serious inconvenience or congestion.

17.3.34 As regards the effect on the School environment, those preliminary proposals show that the link road would be located some 35-45m away from the School's southern boundary at a much lower ground level with the intervening area available for landscaping. This is a roughly similar order of separation as the A38 to the east. I consider that a highway in such a position would be unlikely to give rise to an unacceptable degree of noise nuisance or pollution.

17.3.35 **Issue 5:** It is argued by several objectors that ADRs adjacent to Bromsgrove town should, for reasons of sustainability, be afforded priority for release over other safeguarded land in the District and, in particular, the Plan should indicate that BROM5 will be released first - in advance of BROM5A, BROM5B, BROM 5C and BROM5D. This is in order to take advantage of the road and other infrastructure already provided in connection with the adjacent Barnsley Hall Hospital redevelopment, now nearing completion, and to bring forward construction of a possible A4091-A38 link. Such an approach would, it is claimed, assist in the speedy preparation of the Local Plan Review and would be consistent with the search sequence set out in PPG3 and WCSP Policy SD.7.

17.3.36 Not only do I consider BROM5 to be unsuitable as an ADR for reasons outlined above, but this suggestion runs contrary to the thrust of advice on safeguarded land set out in PPG2. As the Council says, the position is analogous to the process of granting permission for the release of an ADR. In that case Annex B Paragraph B6 indicates: "… planning permission for the permanent development of safeguarded land should only be granted following a local plan or UDP review which proposes the development of particular areas of safeguarded land".

17.3.37 I am satisfied that decisions on which ADR sites should be allocated for development and in what order of priority they should be released, are matters for the Local Plan Review. As I have already remarked elsewhere in my report, circumstances can and no doubt will change over time. I would not wish to pre-empt decisions that ought, more properly, to be taken at a later date in the context of conditions then prevailing. In any event, there appears to be no pressing need for the early release of any ADR. There is currently an adequate land supply, whereby the Council is able to satisfy strategic land targets for quite a number of years ahead without recourse to using safeguarded land.

17.3.38 **Issue 6:** Mrs J M Shephard argues that if BROM5 is not designated as an ADR, the Green Belt boundary along this section of Birmingham Road should be confirmed in its present position, save for exclusion of the intensively developed Townsend Farm Estate. In particular, she says that the Mount School, veterinary surgery and the ribbon of largely frontage development that exists between the settlements should stay in the Green Belt, rather than be excluded as indicated on the Proposals Map.

17.3.39 I am of a similar opinion. Only by such means can an effective gap be maintained between Lickey End and Bromsgrove in the longer term. It is not unusual to find pockets of development within the Green Belt. I note that a similar objection was made to the deposit draft BDLP although it was not dealt with as a separate matter in the previous Inspector's Report. I have considered whether it would be sensible to take the veterinary surgery out of the Green Belt but to do so would weaken the whole idea of separation. I commend to the Council the Green Belt boundary shown by the objector on the plan accompanying objection 176/1077.

17.3.40 **Issue 7:** An objection has been made to the plan accompanying Proposed Modification AREA/MOD20 in that it fails to clearly define the boundaries of BROM5. This minor error has been addressed by the Council through Correction 17 of an Erratum Sheet published with Proposed Further Changes to the Modifications. On that basis the objection has been conditionally withdrawn.

17.3.41 Since I recommend the deletion of Policy BROM5, I make no separate recommendation in respect of this objection.

Recommendations

17.3.42(a) That Proposed Modification AREA/MOD20 be not made.

(d) That the site of BROM5 be confirmed as Green Belt.

(e) That the Green Belt boundary in the vicinity of Birmingham Road be redrawn as shown on the plan accompanying objection 176/1077.

(d) That no further modifications be made to the Plan in respect of these objections.

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17.4 Policy BROM5A – Areas of Development Restraint [Proposed Modification No AREA/MOD22]

171/1001 Dodford with Grafton Parish Council
186/1069 Mr & Mrs R L Smith
179/1078 Mrs V A Lees
183/1079 W A Albutt
187/1080 Miss T L Edwards
188/1081 Mr W Edwards

189/1082	Mrs J Edwards
193/1085	Mr S White & Miss J Harrison
196/1086	A Fisher
1219/1088	Mr & Mrs Hughes
201/1089	B Byrne
204/1090	Mr & Mrs G Healey
207/1091	R L & Mrs G C Tyler
210/1092	Mrs M J Harris
213/1093	Mr & Mrs Harris
219/1095	C Giles
224/1097	Bill Hunt
227/1098	A H & J W English
231/1100	F J Southwell
234/1101	Mrs W E Newton
236/1102	Mr & Mrs G C Parsons
241/1103	Mr & Mrs D E Phipps
242/1104	Mr & Mrs Lammas
245/1105	Lovell Homes Ltd
573/1243	R R Lommas
972/1381	Billingham & Kite Ltd
1008/1385	Stansgate Planning Consultants (various clients)
1238/1437	Mr & Mrs J Suffield

Key Issues

17.4.1 (1) Whether large-scale development on the north-west flanks of Bromsgrove town would harm adjacent areas.

(2) Whether highway improvements and traffic management measures should be specified at this stage.

(3) Whether BROM5A is suitable as an ADR.

(4) The impact of development upon infrastructure, local services and community facilities.

(5) Whether sufficient 'brownfield' sites are available to accommodate longer-term development needs, without recourse to designating BROM5A as an ADR.

(6) The effect on the amenities of the occupiers of existing properties.

(7) Whether too much ADR provision has been concentrated into one area.

(8) The effect on landscape and ecological interests.

(9) Whether BROM5A should be allocated for residential development rather than designated as an ADR.

Inspector's Appraisal and Conclusions

17.4.2 **Issue 1:** Identical objections have been made by Dodford with Grafton Parish Council in respect of BROM5, BROM5A, BROM5B and BROM5D. The common key issue I have identified is dealt with at Paragraphs 17.3.2-17.3.7 of my report. In brief, because I recommend that BROM5 and BROM5B be deleted in favour of an additional ADR to the west of the town, the objection has been partially addressed. I do not favour the various measures advocated by the Parish Council in respect of Worms Ash, Alfred's Well and Dodford Conservation Area.

17.4.3 **Issue 2:** The objection made by Mr and Mrs R L Smith also has implications for BROM5B and BROM5D. In summary, the objectors are concerned that traffic generated by development of these large ADRs, both during construction stages and later, should be directed onto Perryfields Road and restricted from entering existing suburban roads for access to the town centre, shopping etc. Development should, they say, only commence after improvements have been carried out to Perryfields Road and its junctions with Kidderminster Road and Stourbridge Road.

17.4.4 I can appreciate the worries of these objectors and others. It is most likely that highway improvement works and traffic management measures would be required to cater for development of these sites. Having said that, I agree with the Council that it would be premature to seek to address such matters at this juncture. All that is being done at this stage is to identify a pool of land suitable for meeting longer-term development needs and to lay down the necessary policy framework. It is for the subsequent Local Plan Review to consider the scale of allocations that should be made, the timing of the release of such sites, and their land use. Detailed highway issues would need to be addressed in due course through a site development brief and at the planning application stage, as and when sites are allocated for development and layouts prepared. These considerations do not represent finite constraints and do not therefore affect the principle of ADR designation. I note that the Highway Authority does not object to the proposals. Likewise, the relationship of BROM5A to the M5 motorway with its attendant traffic noise and pollution is not, in this case, a serious concern that would affect ADR status.

17.4.5 **Issue 3:** BROM5A is a 34.7ha site immediately adjoining the built-up area of Bromsgrove town on its western side. It is bounded by Perryfields Road and comprises mainly agricultural land and a recreation field. The site has never been incorporated in the Green Belt, but has been retained as unallocated or 'white land'. It is well-contained by strong defensible boundaries and was recommended by the BDLP Inspector for consideration as an ADR.

17.4.6 The site represents a potential urban extension to the town in line with PPG3. It is situated within a public transport corridor defined by the County Council on the basis of a 5 minute drive time of Bromsgrove railway station (discounting local conditions that affect travel time); and is accessible both to the town centre where there is a choice of transport mode, employment opportunities and a wide range of facilities, and to some local services at Sidemoor. The latter includes Sidemoor Primary School and approximately 20 shops and other services in Broad Street and Crabtree Lane, all of which are within 400m walking distance. Kidderminster Road and Stourbridge Road at opposite ends of the site both have regular bus services and there is also a frequent service along Broad Street. As regards rail travel, the Local Transport Plan suggests improvements to increase the capacity, frequency and reliability of services between Bromsgrove and Birmingham. Amongst those measures is a relatively large-scale upgrade of Bromsgrove railway station, currently programmed for 2003-2004, to include additional car parking and the lengthening of platforms. Measured in terms of the WCSP preferences for development, I find BROM5A to be a sustainable location.

17.4.7 I am satisfied that Bromsgrove town is of sufficient size to assimilate this level of development without unduly harming or changing its character - which nowdays is more of a dormitory settlement than a free-standing market town. In terms of landscape impact, the site is not unduly prominent. The majority of the land occupies the inward-facing slopes of the shallow bowl in which Bromsgrove town lies, with Perryfields Road running along a minor ridge to the west. It is therefore visually fairly well-contained.

17.4.8 In my view, BROM5A is the most suitable ADR of all those promoted by the Council around Bromsgrove town. The main drawback is its high agricultural land quality, being principally Grades 1 and 2. I note that an appeal in respect of residential development of part of the site (10.4ha at Red Cross Farm, Perryfields Road [APP/P1805/A/84/019369]) was dismissed in 1987 on agricultural land quality grounds. However, I recognise, as did the BDLP Inspector, that virtually all of the land around Bromsgrove town is similarly constrained making the loss of some 'best and most versatile' land unavoidable in the context of the need to find a sufficient quantity of safeguarded land. I concur with the previous Inspector that the site's agricultural quality is not an exceptional circumstance that can justify its inclusion in the Green Belt. PPG2 makes it quite clear that the extent to which the land fulfils various objectives, including retaining land in agricultural use, is not itself a material factor in Green Belt terms. In my opinion, the overall benefits of the site as an ADR comprehensively outweigh this disadvantage. My conclusion is, I believe, compatible with the advice set out in Paragraph 2.17 of PPG7 (updated in March 2001), which emphasises the importance of achieving high levels of sustainability.

17.4.9 **Issue 4:** The Council acknowledges that new infrastructure and enhanced services and community facilities would be required as and when BROM5A is developed. These would be essential to avoid putting pressure on, for example,

schools, shops, health services, leisure and recreation facilities, open space, public utilities and town centre car parks. They might also provide an opportunity to address outstanding problems such as localised flooding arising from poor land drainage. The lead time associated with the allocation and release of ADRs through a Local Plan Review would allow service providers to plan for and carry out their statutory responsibilities. As regards community facilities, the Council points out that contributions would normally be sought from developers through a planning obligation under S106 of the Town and Country Planning Act 1990 at the time that planning permission is sought. I believe that such measures should ensure that services and facilities keep pace with the scale of development proposed.

17.4.10 **Issue 5:** I note that the Council has consistently granted planning permission for the redevelopment of 'brownfield' land over many years. While previously developed sites continue to come forward, including the Garringtons site revealed during the course of the inquiry, the contribution that such land can make to meeting longer-term development needs is limited. This is confirmed by the WCSP Urban Capacity Study (May 1999). Likewise, 'windfalls' make an important contribution to housing provision but 'infilling' and other unforeseen development is insufficient in itself to meet future housing needs. Consequently, I am satisfied that it is necessary to identify 'greenfield' ADR sites such as BROM5A.

17.4.11 **Issue 6:** Although a number of objectors have expressed concern regarding the loss of rural views and a possible reduction in property values, such matters are not normally regarded as issues that are material to planning decisions. Detailed consideration of the impact of development upon the amenities of existing occupiers would be examined by the Council at planning application stage, as and when layout drawings are prepared. None of these matters affect the principle of ADR designation which is concerned with the generic use of land.

17.4.12 **Issue 7:** It is argued by several objectors that virtually the whole ADR needs of the District are being met in one locality when it would be preferable to seek a more dispersed pattern throughout the local authority area. I cannot agree with this suggestion since it pays little regard to strategic planning policy. The Council is seeking to concentrate development at Bromsgrove town because it is the largest and most sustainable settlement in the District with the broadest range of services and facilities, choice of transport mode and employment opportunities. The BDLPPM indicates that 69.7% of all ADR land would be located there. Even with the further modifications I recommend in my report that figure would still be be approximately 63.4%. This accords with the HWCSP, which is the strategic base for Local Plan purposes, and with the latest WCSP Policy SD.6. The latter points to the majority of the District's development needs being met within or adjacent to Bromsgrove urban area.

17.4.13 As regards the uneven distribution around Bromsgrove town, my recommendations for the deletion of BROM5 and BROM5B and the substitution of land at Whitford Road would retain a concentration of ADR provision - but in a westerly direction rather than to the north/north-west, as currently proposed in the BDLPPM. Development on such an axis would continue the guiding principle established by the Secretary of State in 1990 when he approved modifications and alterations to the HWCSP. To the west the expansion of Bromsgrove town is ultimately constrained by the line of the M5 motorway which forms a strong defensible boundary. In contrast, the scope for ADRs east of the town is severely limited by the higher landscape quality, severance caused by the railway line and weak Green Belt boundaries that would be unlikely to endure. Development to the north and south of Bromsgrove would clearly prejudice maintenance of the narrow Green Belt gaps separating the town from Catshill/Marlbrook/Lickey End and Stoke Prior. There are therefore few options available for achieving a more equitable distribution of safeguarded land around the margins of the town.

17.4.14 The release of ADRs would be phased. While it is a matter for the Local Plan Review to determine, I am told that it is very unlikely that all of the ADRs identified in this western sector of Bromsgrove town would be developed at the same time. This would allow new infrastructure and services to be provided to match the progress of works over the next 20 years or so, and for such development to be assimilated into the wider community.

17.4.15 **Issue 8:** BROM5A is of low landscape value with little scenic interest. A very small part of this extensive area is affected by a Special Wildlife Site designation. However, no objection has been lodged by the Worcestershire Wildlife Trust. It is, in my view, insufficient reason to preclude designation as an ADR.

17.4.16 **Issue 9:** Lovell Homes Ltd argue that the BDLPPM makes inadequate provision for housing land. Because of the delay in adopting the Plan they contend it should provide for development needs through to 2011. In their view the ADR status of BROM5A should be replaced by a residential allocation, reflecting the Council's stance that the site has development potential and should remain excluded from the Green Belt. The site is, they say, acknowledged to be of low landscape value and located on the favoured east-west axis immediately adjacent to the built-up area.

17.4.17 As the Council points out in its response, the BDLPPM allocates land to meet development needs to 2001. The latest Land Availability Studies demonstrate that sufficient residential and employment land has been allocated to meet the HWCSP targets.

17.4.18 For the WCSP period 1996-2011 an outstanding housing requirement of 1169 dwellings remains (at April 2001), equivalent to an 8.1 years supply of housing

land. On a conservative estimate this will allow sufficient time for the Council to carry through a Review of the Local Plan, preliminary work on which has already commenced, to determine which ADRs should be released to meet housing land needs to 2011. On this basis I am satisfied that it is most unlikely there will be an undersupply of housing land over the next few years. There is, in consequence, no justification for allocating any further large housing sites at this time. To do so would be premature. BROM5A should, in my opinion, remain in the Plan as an ADR.

Recommendations

17.4.19 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD22.

(b) That no further modifications be made to the Plan in respect of these objections.

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17.5 Policy BROM5B – Areas of Development Restraint [Proposed Modification No AREA/MOD23]

172/1001	Dodford with Grafton Parish Council
247/1002	The Hagley Estate
168/1074	The Bromsgrove Society
249/1075	Crest Nicholson Residential (Midlands) Ltd
180/1078	Mrs V A Lees
184/1079	W A Albutt
194/1085	Mr S White & Miss J Harrison
197/1086	A Fisher
1220/1088	Mr & Mrs Hughes
202/1089	B Byrne
205/1090	Mr & Mrs G Healey
208/1091	R L & Mrs G C Tyler
211/1092	Mrs M J Harris
214/1093	Mr & Mrs Harris
220/1095	C Giles
225/1097	Bill Hunt
228/1098	A H & J W English
232/1100	F J Southwell
235/1101	Mrs W E Newton
237/1102	Mr & Mrs G C Parsons

240/1103 Mr & Mrs D E Phipps
243/1104 Mr & Mrs Lammas
973/1381 Billingham & Kite Ltd
1010/1385 Stansgate Planning Consultants (various clients)
1208/1405 Wimpey Homes Holdings Ltd
1054/1429 Westbury Homes (Holdings) Ltd
1078/1432 Bovis Homes Ltd
1218/1433 Barratt West Midlands
1239/1437 Mr & Mrs J Suffield

Key Issues

17.5.1 (1) Whether large-scale development on the north-west flanks of Bromsgrove town would harm adjacent areas.

(2) Whether BROM5B is suitable as an ADR and should be excluded from the Green Belt.

(3) Whether the total amount of ADR land proposed is excessive.

(4) The impact of development upon infrastructure, local services and community facilities.

(5) Whether sufficient 'brownfield' sites are available to accommodate longer-term development needs, without recourse to the use of 'greenfield' land.

(6) Whether too much ADR provision has been concentrated into one locality.

(7) Whether traffic generated by the development would give rise to additional congestion and safety concerns.

(8) Whether BROM5B should be extended at its northern corner to facilitate a highway connection.

(9) The effect on living conditions of the occupiers of neighbouring properties.

Inspector's Appraisal and Conclusions

17.5.2 **Issue 1:** Identical objections have been made by Dodford with Grafton Parish Council in respect of BROM5, BROM5A, BROM5B and BROM5D. The common key issue I have identified is dealt with at Paragraphs 17.3.2-17.3.7 of my report. In brief, I conclude that BROM5 and BROM5B should be omitted in favour of an additional ADR to the west of the town. Consequently, this objection has been partially addressed. I do not support the various additional

protective policy measures advocated by the Parish Council in respect of Worms Ash, Alfred's Well and Dodford Conservation Area.

17.5.3 **Issue 2:** The objections made by The Hagley Estate and Crest Nicholson Residential (Midlands) Ltd in respect of BROM5, BROM5B and BROM5D are aimed at the promotion of alternative ADR sites at Hagley. It is suggested that those sites could be considered either by way of replacement or as an addition to land promoted by the Council at Bromsgrove town. I have already set out elsewhere in my report what I consider to be an appropriate quantity and distribution of safeguarded land to meet the needs of the District until 2021. In short, I see no justification for identifying a greater total of ADR land and I accept that the majority of ADR provision should be made in or adjacent to Bromsgrove town in recognition of the size, importance and sustainability of this main settlement. It is against this background that I examine the objections to BROM5B.

17.5.4 BROM5B comprises 15.8ha of land north of Perryfields Road extending between Fockbury Mill Lane in the west and Stourbridge Road in the east. It is bounded to the north by the line of Battlefield Brook. The land is in agricultural use as arable fields, rough grassland and cultivated turf. It falls gently in elevation towards the M5/M42 junction and lies within the interim Green Belt. While the south-western and north-eastern ends of the site are well-enclosed by hedgerows the central section has a degraded landscape structure that is much more open. The site was not previously considered by the BDLP Inspector but was selected by the Council as an ADR following a comprehensive study of potential sites.

17.5.5 Looking first at Green Belt matters, it seems to me that this site performs 2 functions. Like most of the other proposed ADRs it assists in safeguarding the countryside from encroachment. But more importantly in this case it helps to prevent neighbouring settlements from merging into one another. As I have remarked in relation to BROM5, Bromsgrove town and Catshill-Marlbrook-Lickey End are separated by a narrow gap of open land. The integrity of that gap has already been compromised to a degree by the presence of the M42 motorway and by pockets of residential development along the Stourbridge Road frontage. The Council points out that while the BDLP Inspector regarded the gap between Bromsgrove and Catshill as important, he was less concerned about sites outside the area contained by the Stourbridge and Birmingham Roads. In evaluating a site on the southern edge of Catshill, he stated: "It is to the west of the Stourbridge Road just outside what I regard as the key, central section of the gap." Because of redevelopment recently implemented at Barnsley Hall Hospital (a PPG2 Annex C 'Major Developed Site in the Green Belt'), the Council maintains that BROM5B would not bring Bromsgrove town any closer to Catshill.

17.5.6 I appraise the situation somewhat differently and believe there is a need to look at the gap between Bromsgrove and Catshill/Marlbrook/Lickey End as a whole. This means protecting its overall extent and not just maintaining a minimum

separation distance. Development of BROM5B would in my opinion contribute to the incremental erosion of that vital section of Green Belt, serving to further reduce the amount of separation and contributing over time to the merging of settlements which Green Belt policy seeks to avoid. This would conflict with strategic guidance given by the Secretary of State in relation to the HWCSP and various Inspectors over the years that future growth at Bromsgrove should generally be on an east-west axis, avoiding areas to the north and south of the town. I note that a somewhat larger site, embracing this land but extending to the M5/M42 intersection (Site 4 – Fockbury Mill), was evaluated in the Council's ADR matrix. The site was scored for coalescence, encroachment and sprawl, and attracted an overall value of 60. This was significantly higher than many of the other selected ADRs, and indeed a number that were rejected.

17.5.7 Development in this location would be visible over an extensive area, particularly when seen from the M5/M42 junction, the motorway bridge on Fockbury Mill Lane, Stourbridge Road and, further afield, from rising land to the north-west at Worm's Ash. The site forms part of the foreground views of Bromsgrove. It falls outside the shallow bowl in which the town nestles and either straddles or lies beyond a low ridgeline that roughly follows Perryfields Road around the north-west flanks of the settlement. The impression created by urban development here would be of a township extending beyond natural topographic limits and sprawling into the surrounding countryside. This would adversely affect Bromsgrove's rural setting and in consequence have a substantial visual impact. While it can be argued that Battlefield Brook is a defensible Green Belt boundary, in terms of the advice given in Paragraph 2.9 of PPG2, it would do little from a landscape perspective to visually contain the development, even when reinforced with additional planting. Unlike BROM5D further to the south, this site is not closely bounded by motorway. The M5/M42 junction lies at a greater distance trapping a much more extensive area of open farm land in between that could conceivably become subject to development pressures over time.

17.5.8 Turning to matters of sustainability, BROM5B lies within the 5 minute drive time of Bromsgrove railway station identified by the County Council in the Transport Corridors Study. It therefore has scope for promoting the use of modes of transport other than the private car and is, by definition, sustainable. However, it is situated on the opposite side of Bromsgrove town centre from the railway station at a straight line distance of 3.1km (3.8km by road) and involves crossing the A38. This means that peak journey times to the railway station (in particular) can and often do exceed 5 minutes duration. In addition, the Council acknowledges that improvements are required both to the rail operating services and station infrastructure. They include additional car parking, for which the Council has already committed both land and a capital sum, lengthening of platforms, more frequent services and, preferably, electrification. Such factors tend to detract from the site's accessibility.

17.5.9 There are currently no bus services operating on Perryfields Road, but regular and frequent services exist along Stourbridge Road (9 or more per hour) which is within walking distance of all parts of the site. Some of these could be re-routed, if necessary, to penetrate BROM5B. A number provide direct access to Bromsgrove railway station. The land is within reasonable travel distance of the town centre (approximately 2km) with its broad range of facilities and services. I note that there is also a limited amount of local provision at Sidemoor, accessible on foot at a distance of about 1km. Development at BROM5B and the adjacent ADRs would help to maintain or enhance the viability of those facilities.

17.5.10 I conclude, on balance, that this land on the edge of the town is a sustainable location for ADR provision - although not perhaps the very best site in terms of accessibility.

17.5.11 Looking now at potential constraints to development, several objectors are concerned that proximity of the M5/M42 motorway junction might render the site unsuitable as an ADR by virtue of air pollution and noise nuisance. Detailed technical evidence was presented to the inquiry on behalf of both The Hagley Estate and Wimpey Homes Holdings Ltd, and reviewed by the Council. It was agreed that in terms of air quality there is no impediment to the identification of BROM5B (nor BROM5 and BROM5D) as safeguarded land. While there are differences between the parties over noise with the Council setting a number of caveats, the overall conclusion based on site measurements (Wimpey) and calculations (Hagley) is that there is little deviation in noise exposure category (NEC) classification. BROM5B lies mainly in NEC B (55-63 dB(A), 0700-2300 hrs), with an area in the western corner exposed to NEC C (63-72 dB(A), daytime and night-time) ratings. PPG24 (Planning and Noise) advises in respect of residential development that for category B: "Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise." In relation to Category C it states: "Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise."

17.5.12 Consequently, I am satisfied that residential development could occur over the greater part of the site with standard thermal glazing ensuring satisfactory internal noise levels. As regards the area within NEC C, that could be used for employment purposes to promote mixed use development and thereby help reduce the geographical imbalance of workplace to residence that is evident in the town. Alternatively, it could simply be excluded from built development altogether. Whatever the proposal, I conclude that it would not present an insurmountable obstacle to ADR designation. Even though the Council has not provided evidence to back up its assertions, I am reasonably content that any noise attenuation measures required would be unlikely to impact significantly on the landscape.

17.5.13 Another drawback is the high agricultural land quality, with much of BROM5B comprising Grades 1 and 2. However, 'best and most versatile' agricultural land occurs in most locations around Bromsgrove town, particularly on the east-west axis. If the very best ADR sites are to be selected on the basis of Green Belt function and sustainability it is inevitable that some high grade farmland will be lost. This point was acknowledged by the BDLP Inspector who remarked: "However, as in the case of the Bromsgrove town area, much of the land around the settlement is of good quality, and almost any peripheral housing development is likely to use some such land." PPG2 makes it clear that the extent to which land fulfils various objectives, including retaining land in agricultural use, is not itself a material factor in Green Belt terms.

17.5.14 A third constraint relates to the presence of Battlefield Brook. A strip of land along the northern edge of the site following the brookcourse falls within the indicative floodplain. However, I note that the Environment Agency has been consulted and has raised no objection to ADR designation. While this would be a matter for detailed consideration at the development brief/planning application stages, it does not, to my mind, represent a fundamental limitation that affects the principle of ADR designation.

17.5.15 Drawing together my views on this site, I believe that the location of BROM5B on the north-south axis of the town and its adverse impact on the narrow Green Belt gap between Bromsgrove and Catshill and on the rural setting of the town render it inappropriate for selection as an ADR. Its general sustainability and the absence of any overriding constraints do not, in my opinion, outweigh those concerns. I conclude, on balance, that BROM5B should be deleted from the Plan in favour of other more acceptable ADR sites.

17.5.16 **Issue 3:** The Bromsgrove Society has noted that at the WCSP EiP held in July 2000 the District Council confirmed no Green Belt land would be needed to achieve the County Council's housing target for Bromsgrove to 2011. In the Society's view the 141.6 ha of ADR land proposed to meet development needs between 2011and 2016 is excessive.

17.5.17 In response, the Council has indicated that current figures suggest there is sufficient housing land allocated to last until about 2009 without the need for ADR releases. Any shortfall to 2011 could, if necessary, be made up by non-Green Belt ADR sites such as BROM5A, with other safeguarded land following as and when required. The Council's preference though would be to examine all ADR land to achieve a coherent strategy of planned ADR releases as part of the Local Plan Review process.

17.5.18 I consider that the overall quantity of safeguarded land identified by the Council is about right to satisfy longer term development needs. However, rather than accommodating likely requirements to 2016, as envisaged in the BDLPPM, I have concluded elsewhere in my report that the 140ha (approx) proposed should be

sufficient to last until 2021 or thereabouts. In my opinion, that is a more appropriate time horizon when establishing/confirming new Green Belt boundaries that will endure.

17.5.19 **Issue 4:** The Council acknowledges that new infrastructure, facilities and services would be required in association with ADRs to meet increased demand for school places, community facilities, shops, health services, utilities, town centre car parking and the like. The long-term nature of that development would allow service providers adequate time to plan for and meet their various responsibilities, as well as addressing any local issues such as land drainage. Moreover, the Council says that it would be likely to seek contributions from developers at application stage through planning obligations made under S106 of the Town and Country Planning Act 1990. I am confident that by those means services and facilities would correspond with the scale of development that takes place following the allocation of sites in the Local Plan Review and their subsequent release.

17.5.20 **Issue 5:** The availability of 'brownfield' sites to meet future development needs is dealt with at Paragraph 17.4.10 of my report in response to a similar objection to BROM5A. Exactly the same considerations apply in respect of BROM5B.

17.5.21 **Issue 6:** A number of objectors are concerned that much of the District's ADR provision has been unreasonably concentrated into Bromsgrove town and directed to one area in particular on the north-western fringes. I address this matter in detail at Paragraphs 17.4.12-17.4.14 of my report when dealing with similar objections to another ADR. In short, Bromsgrove town is considered to be the most sustainable settlement to accommodate future growth. While I recommend a slightly different axis of development from that proposed in the BDLPPM, I conclude that because of varied constraints there are few options available to achieve a more equitable distribution of safeguarded land. However, the release of ADRs would be phased and it is unlikely that all safeguarded land in the western sector of the town would be allocated at the same time.

17.5.22 **Issue 7:** Reservations have been expressed that development of this and other adjacent ADRs would add to traffic congestion experienced along Stourbridge Road, Kidderminster Road and throughout the town centre generally, and would exacerbate safety concerns. Objectors allege that Perryfields Road is already an accident blackspot, even though only 1 personal injury accident has been recorded during the period 01/01/95-31/07/00.

17.5.23 I do not wish to make light of those worries. However, decisions on the scale of allocations required, the timing of their release and the precise land use of each ADR are matters to be addressed in the subsequent Local Plan Review. Detailed highway issues would be considered in due course through a site development brief and at planning application stage; and any necessary highway improvement

works would then be programmed for implementation before development comes on stream. Consequently, such considerations do not affect the principle of ADR selection. I note that the Highway Authority has raised no objection to BROM5B, nor to any of the other proposed ADRs.

17.5.24 As regards a possible long-term road link extending from Kidderminster Road to the A38 Birmingham Road along the north-western perimeter of the town, I give this preliminary proposal very limited weight. Little work appears to have been done to assess its feasibility and it has not been properly evaluated against alternative highway strategies.

17.5.25 **Issue 8:** Wimpey Homes Holdings Ltd seek a small extension to BROM5B at its northern end. This would, they say, facilitate a highway connection to the existing roundabout on the Stourbridge Road in order to make effective use of existing infrastructure provided in connection with redevelopment of the Barnsley Hall Hospital site. I consider such an amendment to be unnecessary. There have been many examples of highway schemes taking place in the Green Belt. Far better, in my view, for the Green Belt boundary to adopt the line of Battlefield Brook, which forms an existing landscape feature, than to anticipate a possible new road line that could be subject to change as and when detailed assessments are undertaken. As the Council points out, a site development brief would be drawn up to establish land use and layout principles, including the need for highway works, in advance of site release.

17.5.26 Since I recommend the deletion of BROM5B as an ADR this objection has limited consequence.

17.5.27 **Issue 9:** I have previously indicated that effects on property values and the loss of private views are not issues normally germane to planning decisions. Any likely impacts of ADR designation on the living conditions of the occupiers of existing properties would be considered by the Council at planning application stage, as and when detailed layout plans are prepared and submitted for approval. None of these matters affect the principle of ADR designation.

Recommendations

17.5.28 (a) That Proposed Modification AREA/MOD23 be not made.

(b) That the site of BROM5B be confirmed as Green Belt.

(e) That no further modifications be made to the Plan in respect of these objections.

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17.6 Policy BROM5C – Areas of Development Restraint [Proposed Modification No AREA/MOD24]

1209/1405 Wimpey Homes Holdings Ltd
1248/1442 Mrs E Derrington
1252/1445 Mrs J Reading
1253/1446 Mrs M D Foley
1254/1447 Mr & Mrs Mahon
1255/1448 Mr & Mrs F B Hollick
1256/1449 Miss J Rogers
1276/1451 Mr & Mrs D Tuson

Key Issues

17.6.1 (1) Whether BROM5C is suitable as an ADR and should be excluded from the Green Belt.

(2) Whether the local highway network can accommodate the additional traffic likely to be generated.

(3) Whether community services and facilities would be adequate.

(4) The effect on wildlife.

Inspector's Appraisal and Conclusions

17.6.2 **Issue 1:** BROM5C comprises 7.8 ha adjacent to the former Wagon Works site on the south-east edge of Bromsgrove town, used as untended grassland, scrub and sheep-grazed pasture. The site is irregular in shape, wrapping around 2 sides of the recently completed Rutherford Road housing development. It is bounded to the north-east by St Godwald's Road, to the south-east by Bromsgrove Cricket, Hockey and Tennis Club and a further area of playing fields, and to the west by the main railway line. The only other development east of the railway line is a ribbon of development extending along the north-east side of St Godwald's Road directly opposite the objection site.

17.6.3 The land lies within the confirmed Green Belt where detailed boundaries have previously been approved. It is the only ADR identified by the Council on the south-eastern edge of the town. The BDLP Inspector assessed this site amongst many others. The methodology he advocated was to look first at the 'interim' areas of Green Belt, identifying all reasonably acceptable sites as ADRs. Only if additional land was required would better sites in 'confirmed' areas be taken in preference to any remaining poor sites in the interim areas. Applying this sequential approach he recommended BROM5C as an ADR.

17.6.4 Wimpey Homes Holdings Ltd argue that in the context of a significantly lower ADR requirement than envisaged by the BDLP Inspector (almost 40% less), there are no exceptional circumstances sufficient to justify releasing this land from the confirmed Green Belt. I do not concur with that view which I believe to be over-simplistic. It pays no regard to the many other considerations that are relevant to ADR selection. Amongst these are the need to provide a reasonable distribution of safeguarded land in the most sustainable locations and to ensure that growth occurs generally on an east-west axis, avoiding the narrow Green Belt gaps separating the town from other settlements to the north and south. I do note, however, that in reducing ADR provision the Council has sought to take out some sites in confirmed Green Belt locations that were supported by the BDLP Inspector. They include land at Hagley, Alvechurch and Wythall.

17.6.5 The main Green Belt purpose of this site is to assist in safeguarding the countryside from encroachment. A secondary function is, arguably, to check the unrestricted sprawl of large built-up areas. I do not regard these as particularly significant given that virtually all ADRs around Bromsgrove town perform similar roles. Options for future development east of the railway line are clearly very limited. Constraints include the railway line itself which has few crossing points and inhibits access; the attractive nature of the landscape, much of which is designated as a Landscape Protection Area; and the high agricultural quality of most of the surrounding farmland. However, some housing development has previously taken place beyond the railway line on the site of the former Wagon Works. This is, in my opinion, capable of providing a nucleus for further growth. Like the BDLP Inspector, I consider that a moderate extension to the Rutherford Road estate would not be a serious threat to Green Belt purposes and objectives.

17.6.6 Concern has been expressed by some objectors that designation of BROM5C as an ADR would push development deeper into the surrounding countryside away from the heart of the settlement and the defensible boundary of the railway. I do not see this as a major concern. The land is fairly low-lying and reasonably well-contained by mature hedgerows along its boundaries, affording limited visibility of the site from most locations. A Landscape Protection Area has been defined embracing Finstall Park to the north and east, and linking through to rising ground at Upper Gambolds Farm to the south-east. Because that area is separated from BROM5C by recreational land uses and existing housing I do not believe its integrity would be compromised nor would the setting of Bromsgrove town be harmed. While acknowledging the severance caused by the railway line, further development here would not in my view be poorly related to the prevailing urban form of the town.

17.6.7 BROM5C represents in my view a very sustainable option for longer-term development, performing well against the criteria set out in Paragraph 31 of PPG3. In particular, it is within easy walking distance of Bromsgrove railway station and local facilities at Aston Fields, is readily accessible to the town centre, and has many employment opportunities available in the immediate locality - this

being the town's main employment area ranging in character from commercial and office uses through to warehousing, heavy industry and public utilities.

17.6.8 A 'Constraints and Opportunities Assessment' has been prepared on behalf of the Bryant Group. This demonstrates the suitability of most of the site for residential development, with the exception of the south-western 'tail' which is constrained by a mature oak copse and the need to bridge a stream. Development would put pressure on some local services and facilities. It is recognised that there would, in all likelihood, be a need for contributions to improve/expand education facilities and to upgrade bus services, and for the developer to provide a children's playground. Such requirements would be addressed through a S106 planning obligation and site development brief.

17.6.9 As regards agricultural land quality, the site is a mixture of Grades 3A, 4 and non-agricultural. In comparison with most other land around Bromsgrove town that is of a very low standard indeed, giving further support to the selection of this site as an ADR.

17.6.10 I conclude that BROM5C is a suitable site for longer-term development and that exceptional circumstances exist for excluding the site from the confirmed Green Belt. The sustainability advantages of the site and the absence of any fundamental constraints outweigh the limited harm caused to Green Belt purposes.

17.6.11 **Issue 2:** The Council acknowledges the traffic congestion that exists in and adjacent to the centre of Aston Fields. A site adjacent to the railway station is proposed for car parking under Policy BROM31. It is shown on the Proposals Map. That scheme has the potential to reduce the extensive on-street car parking that currently takes place along St Godwald's Road and elsewhere in the locality, examples of which I saw on my site visits. The Highway Authority has not objected to this ADR. Any detailed highway issues would need to be examined at planning application stage and, if appropriate, addressed by means of a S106 planning obligation. As the Council points out, more general improvements might also be achieved over time through economic/social pressure for enhanced infrastructure and services. These matters do not, in my view, affect the principle of ADR designation.

17.6.12 **Issue 3:** ADRs supply a reservoir of land excluded from the Green Belt from which housing and other allocations would be made and released in a phased manner through the Local Plan Review. By definition they provide for development needs in the longer term - in this case over the next 20 years or so. The lead time involved means that statutory undertakers and other providers would have the opportunity to plan, monitor and manage the services they deliver, thereby ensuring that essential facilities and services, such as schools, shops, medical facilities and car parking for example, are all in place to support development when it occurs. In the case of existing local shops, additional

housing would help to ensure their continued viability and possibly lead to greater consumer choice.

17.6.13 **Issue 4:** Some objectors are concerned that development of the site would displace wildlife. However, this is the case with all built development. The arguments for and against any scheme have to be carefully weighed alongside many other considerations. I note that Worcestershire Wildlife Trust was consulted on this ADR proposal but raised no objection.

Recommendations

17.6.15 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD24.

(c) That no further modifications be made to the Plan in respect of these objections.

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17.7 Para 21.8C – Areas of Development Restraint [Proposed Modification No AREA/MOD24]

1271/1382 Bryant Group

Key Issue

17.7.1 Whether the supporting text should be expanded to explain the Council's reasons for selecting BROM5C as an ADR and the benefits of the site.

Inspector's Appraisal and Conclusions

17.7.2 While promoting BROM5C as an ADR the Bryant Group object to the lack of a robust explanation of the Council's support for this site. They suggest the following sentence be added to the explanatory text at Paragraph 21.8C: "…The site represents a very sustainable location forming an efficiently developed extension to the urban area lying in close proximity to Bromsgrove station and the Aston Fields local centre."

17.7.4 I have already considered this issue in general terms when looking at the adequacy of the Council's ADR site selection process (see Paragraphs 1.2.34-1.2.38 of my report). I conclude that it would be impracticable for the explanatory text to set out the particular reasons why each ADR has been chosen.

To do so would burden the Plan with excessive detail and much repetition. The very fact that a site has been identified means that it is appropriate, in principle, for future development. It is for the subsequent Local Plan Review to decide on the quantity and order in which sites should be allocated and released.

17.7.5 The alternative solution I favour is for Paragraph 8.19 of the Plan (supporting Policy DS8) to be augmented, or an additional Appendix introduced, that would identify the general criteria used in the selection of ADRs. I also recommend that the same text be further modified to explain: (a) that ADR provision is being made to satisfy requirements to about 2021, (b) the way in which the total quantity of ADR land has been derived, (c) the factors that have determined the broad geographical distribution of safeguarded land, and (d) the 'exceptional circumstances' that necessitate a revision of confirmed Green Belt boundaries. Those recommendations, set out at Paragraph 1.2.51 of my Report, address many of the points introduced by the Bryant Group in their written representations in amplification of the original objection.

17.7.6 As regards the criticisms made of the Council's ADR matrix, I note that it was designed to build a degree of objectivity into the process of ADR selection. It was not intended to become the sole determinant of ranking but rather to be used as an aid to decision making to filter out the most unacceptable sites at an early stage. Remaining sites were, I am told, continually re-examined by the Council against Green Belt purposes and sustainability factors, with due regard paid to constraints, changing circumstances and geographic variations. My views on the adequacy of that matrix exercise are set out elsewhere in my report. Suffice it to say that I place relatively little weight on the overall scores achieved.

Recommendations

17.7.7 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD24.

(c) That no further modifications be made to the Plan in respect of this objection.

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17.8 Policy BROM5D – Areas of Development Restraint [Proposed Modification No AREA/MOD25]

173/1001 Dodford with Grafton Parish Council
254/1002 The Hagley Estate

255/1075	Crest Nicholson Residential (Midlands) Ltd
181/1078	Mrs V A Lees
185/1079	W A Albutt
195/1085	Mr S White & Miss J Harrison
198/1086	A Fisher
199/1087	Mark Giles
200/1088	Mr & Mrs Hughes
203/1089	B Byrne
206/1090	Mr & Mrs G Healey
209/1091	R L & Mrs G C Tyler
212/1092	Mrs M J Harris
215/1093	Mr & Mrs Harris
221/1095	C Giles
226/1097	Bill Hunt
229/1098	A H & J W English
230/1099	Cynthia Gamble
233/1100	F J Southwell
238/1102	Mr & Mrs G C Parsons
239/1103	Mr & Mrs D E Phipps
244/1104	Mr & Mrs Lammas
974/1381	Billingham & Kite Ltd
1012/1385	Stansgate Planning Consultants (various clients)
1041/1387	Bellway Estates
1055/1429	Westbury Homes (Holdings) Ltd
1066/1430	Persimmon Homes
1079/1432	Bovis Homes Ltd
1088/1433	Barratt West Midlands
1240/1437	Mr & Mrs J Suffield

Key Issues

17.8.1 (1) Whether large-scale development on the north-west flanks of Bromsgrove town would harm adjacent areas.

(2) Whether BROM5D is suitable as an ADR and should be excluded from the Green Belt.

(3) The impact of development upon infrastructure, services and local facilities.

(4) Whether sufficient 'brownfield' sites are available to accommodate longer-term development needs, without recourse to the use of 'greenfield' land.

(5) Whether too much ADR provision has been concentrated into one locality.

(6) Whether traffic generated by the development would give rise to additional congestion and safety concerns.

(7) Whether BROM5D should be enlarged on its western side to take in land as far as the M5 motorway.

(8) Whether BROM5D should be enlarged to the south to take in land bounded by Kidderminster Road, Timberhonger Lane,Whitford Road and the M5 motorway.

(9) Whether the linear shape of the site would preclude a satisfactory form of development.

Inspector's Appraisal and Conclusions

17.8.2 **Issue 1:** This issue has been addressed at Paragraphs 17.3.2-17.3.7 of my report, in response to similar objections made in respect of BROM5, BROM5A and BROM5B. By recommending the deletion of BROM5 and BROM5B and reorientating ADR provision in Bromsgrove town along more of an east-west axis the concerns of Dodford with Grafton Parish Council have been partially overcome. In any event, ADR releases would be phased and the Council considers it most unlikely that all such sites in this part of the town would be developed at the same time. I do not support the protective policy measures suggested by the Parish Council in respect of Worms Ash, Alfred's Well and Dodford Conservation Area.

17.8.3 **Issue 2:** BROM5D comprises a site of 13.9 ha situated on the west side of Perryfields Road in the north-western sector of Bromsgrove town. This linear site extends from Kidderminster Road in the south to Fockbury Mill Lane in the north. To the west, separated by a roughly equivalent area of open farmland, is the M5 motorway which runs variously at grade, in cutting and on embankment. A larger area embracing this site but extending to the M5 motorway and to the south of Kidderminster Road as far as Timberhonger Lane was recommended for consideration as an ADR by the BDLP Inspector. The land constitutes interim Green Belt. BROM5D was chosen by the Council at a late stage in the ADR selection process (July 2000), in substitution for a 24.3 ha site at Stoke Prior. The decision was made, amongst other matters, because of higher than expected windfalls resulting in the need for less ADR land, the location of BROM5D closer to the facilities and services of the District's main urban area, and the opportunity to secure mixed use development.

17.8.4 The site performs 2 Green Belt purposes. Firstly, it assists in safeguarding the countryside from encroachment and, secondly - bearing in mind that land east of Perryfields Road (BROM5A) currently remains undeveloped - it checks the unrestricted sprawl of a large built-up area. Neither of those roles is critical in my view given the particular circumstances that apply in this part of Bromsgrove

District. The former is a function common to virtually all ADRs on the edge of settlements. And in the latter case, the M5 motorway a little further to the west presents the clearest backstop to expansion of the town in that direction. Unlike BROM5 and BROM5B, here there are no critically narrow Green Belt gaps where ADR provision would lead to the merging of settlements.

17.8.5 The most obvious deficiency is the arbitrary nature of the proposed Green Belt boundary which would follow the western limits of the proposed ADR. This would not comply with the advice given in Paragraph 2.9 of PPG2 that readily recognisable features should be used, such as roads, streams, belts of trees or woodland. It would be far more appropriate, in my view, to adopt the line of the M5 motorway as the Green Belt boundary, rather than rely on such factors as noise contours that are liable to change over time. The strip of non-Green Belt land trapped between the proposed ADR and the motorway could be maintained in an open form, devoid of building development, by the application of a strategic open space policy. Such a solution would, I believe, accord with the spirit of PPG2.

17.8.6 The objection site lies on a gentle ridge which falls in elevation from about 105m AOD in the north to about 95m AOD in the south, forming the rim of a shallow bowl containing much of Bromsgrove town. It roughly follows the line of Perryfields Road, with some west-facing slopes dropping gently towards the M5. As a result, development would be visible from sections of the motorway, Fockbury Mill Lane, Kidderminster Road and higher ground to the west beyond the M5. Evidence presented on behalf of Crest Nicholson Residential (Midlands) Ltd assesses the potential landscape impact as 'moderate/substantial' and the potential visual impact as 'substantial'. However, any loss of visual containment has to be weighed against other considerations. Not least of these are the imperative of finding sufficient ADR land at Bromsgrove town and the location of the site on the long-favoured east-west axis. Indeed, the BDLP Inspector noted that land west of Perryfields Road was "well placed to promote the policy objective for the future direction of growth of Bromsgrove town."

17.8.7 The context in which the site would be seen would change significantly if and when land at BROM5A to the east of Perryfields Road was developed. Providing sufficient structural planting and other landscaping was carried out, which might extend onto the adjoining open land, I am satisfied that the rural setting of Bromsgrove town would not be seriously compromised. This would also appear to have been the view of the BDLP Inspector in recommending this site for consideration as an ADR. While accepting that development of this land "would probably be somewhat more intrusive than development on the land to the east of Perryfields Road" he concluded nevertheless that "broadly speaking, similar considerations apply." Finally on this point, I do not believe that a substantial planting belt would necessarily be out of keeping. Existing views of the site are marred by the tall *Cypressus leylandii* hedge around the Arras Fruit Farm and by the many field boundaries that have been lost over the years. New

planting would provide the opportunity to create a more attractive landscape structure.

17.8.8 Turning to look at the sustainability of the site, BROM5D is situated about 3.8km from Bromsgrove railway station, on the opposite side of the town. It lies within the 5 minute drive and 15 minute cycle ride isochrones, as defined in the Transport Corridors Study. Some objectors take issue with this, arguing that significant travel delays are experienced during the morning and early evening peaks when traversing the town centre and crossing the A38, resulting in longer journey times. However, it is made clear in the Study that local factors have not been taken into account and that the isochrones should be applied flexibly. Whatever the true position, the site is, in my judgement, a reasonably sustainable option. Given the disparity in size between Bromsgrove and other settlements, such as Hagley, it is not surprising that proposed ADR sites around the town are generally beyond easy walking distance.

17.8.9 The rail corridor at Bromsgrove is acknowledged to be in need of enhancement to both operating services and station facilities. The Local Transport Plan for Worcestershire 2001-2006 gives high priority to increasing the capacity, frequency and reliability of services between Bromsgrove and Birmingham and to improving station accessibility. I note that the Council has committed both land and capital to provide additional station parking and is represented on a working party that includes the County Council and train and rail operators. There is therefore prospect of achieving some improvement by the time safeguarded land is released for development - which is likely to be quite a few years hence.

17.8.10 BROM5D is within an acceptable distance of the town centre with its broad range of facilities and services, choice of travel modes and employment opportunities, and there are local services available at Sidemoor providing shops and school. Buses do not currently operate on Perryfields Road although these could be readily provided. There are, however, regular and frequent services along Stourbridge Road and Broad Street, with one bus route connecting to the railway station. And the site has scope for the introduction of mixed uses. Employment development here would help to address the present imbalance where most jobs are concentrated into the south-east sector of the town. Moreover, the relative position and accessibility of this site would be enhanced as and when the much larger BROM5A site is developed. Because that adjoining ADR on the east side of Perryfields Road falls outside the Green Belt and abuts the existing built-up area, it is likely to be developed earlier than most.

17.8.11 There are a number of potential constraints that apply to this site. The most significant of these are noise/air pollution and agricultural land quality. Looking first at amenity issues, there is agreement between The Hagley Estate and the Council that air quality is not a limiting factor, given that relevant thresholds are not exceeded anywhere on the site. As regards noise nuisance, the Council

attaches a number of caveats but there is a broad consensus that the land mainly falls within Noise Exposure Category C (for residential development), with the north-west corner closest to the M5 in Category D. PPG24 Annex 1 states in respect of Category C that: "Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise." And for Category D: "Planning permission should normally be refused." It is the Council's view that residential development would not be precluded over most of the site if adequate measures were taken to achieve sound attenuation. More detailed noise assessments would be carried out prior to any future development, with requirements being incorporated into a development brief. In this regard, I note that the BDLP Inspector did not raise noise as an issue.

17.8.12 Having reviewed the technical evidence, I am satisfied that the noise constraint is not so fundamental as to preclude the selection of this site as an ADR. I say this for several reasons. Firstly, better ADR sites are in short supply around Bromsgrove town when examined in the round and assessed against Green Belt and sustainability criteria. I have already concluded that BROM5 and BROM5B are unacceptable and should be omitted. Secondly, this site is seen by the Council and myself as one that offers perhaps the greatest potential for accommodating mixed or even wholly employment use. Commercial/industrial development is, by its very nature, capable of withstanding noisier environments. Thirdly, there is scope for achieving noise attenuation in many different ways. Such measures might include, for example, planting, bunding and fencing; layouts that employ non-residential buildings to screen pockets of noise sensitive development; housing designed so as to face away from the motorway; and non-family dwellings with limited external garden areas. If carefully designed, I believe that acoustic barriers need not be visually intrusive. Fourthly, only a relatively small part of the site lies within NEC D where there might be considered to be an absolute prohibition on residential development. That land adjoins Battlefield Brook and roughly coincides with an area of indicative floodplain. Subject to approval by the Environment Agency, who have raised no objection to the proposed ADR, it could be used for other purposes including structural landscaping.

17.8.13 The second main constraint relates to agricultural land quality, with much of the site classified as Grades 1 or 2 and a smaller part as Grade 3a. However, a similar concern applies to most of the land on the periphery of Bromsgrove town. Scope for avoiding the 'best and most versatile' agricultural land is limited. This was acknowledged by the BDLP Inspector who said: "The main reservation is that, from the information available, it is of very high agricultural land quality. Some of it is used for fruit growing, which is quite appropriate for land of that type. If land of lesser agricultural value were available which was as acceptable, or nearly as acceptable, in other respects, this area west of Perryfields Road would not be considered for possible future development. On the basis of the

sites brought to my attention, that is not the position." While constituting a significant disadvantage, the loss of high quality farm land is not, in my view, a compelling objection when considering the particular circumstances that apply to Bromsgrove town and many other parts of the District and the need to secure ADRs in the most sustainable locations.

17.8.14 I conclude, on balance, that BROM5D is suitable as an ADR even though it might not win any contest for the prime ADR site nor come first in any order of priority for release. When assessed in terms of Green Belt functions and sustainability, I consider that its merits outweigh the disadvantages of traffic noise nuisance and high agricultural land quality. In making this judgement I attach little importance to the possibility of achieving a western orbital road link from Kidderminster Road through to the A38 Birmingham Road or beyond. That option has not yet been evaluated against alternative highway strategies. As one objector put it at the inquiry, the problem ought to be resolved at Kidderminster because the destination of many drivers approaching the town from that direction is not Bromsgrove but the M42. It would I feel be quite wrong for highway works of that magnitude to come along on the coat tails of the ADR exercise or for ADRs to be selected on the basis that they could facilitate such links.

17.8.15 **Issue 3:** This issue has been previously addressed in my report in respect of objections to other nearby ADR proposals (see, for instance, Paragraph 17.5.19). In brief, the long-term nature of safeguarded land would afford the opportunity for service providers to plan and carry out necessary infrastructure works so that facilities are in place and available to support development as and when it occurs. This would include such matters as medical services, schools, shops, parking, policing, sewerage etc. It would also provide an opportunity to address any existing problems. The Council has indicated that, where appropriate, contributions would normally be sought from developers at application stage through S106 planning obligations.

17.8.16 **Issue 4:** The availability of 'brownfield' and 'windfall' sites is dealt with at Paragraph 17.4.10 of my report. The same considerations apply to BROM5D.

17.8.17 **Issue 5:** Some objectors maintain that too much ADR provision has been focused on Bromsgrove and, in particular, on the north/north-west sector. I deal with this matter more fully at Paragraphs 17.4.12-17.4.14 of my report. But in short, Bromsgrove is acknowledged to be the most sustainable settlement in the District where future development should be concentrated. I recommend that BROM5 and BROM5B be deleted and another ADR designated. Those further modifications would, if accepted, re-orientate development onto more of an east-west axis away from the sensitive northern gap separating Bromsgrove town from Catshill-Marlbrook-Lickey End. Because of a number of constraints, there is very little scope for future development to the east of the town. In any event, the release of ADRs would be phased, monitored and managed through the Local

Plan Review. The Council considers it highly unlikely that all safeguarded land in the same sector would be released at the same time.

17.8.18 **Issue 6:** Concerns expressed by various objectors about traffic congestion and highway safety are, I believe, matters that should be addressed at development brief/planning application stages. When consulted on the ADR proposals I note that the Highway Authority offered no objections. In my view such reservations are not so fundamental as to affect the principle of ADR selection. It would be premature to specify and require improvement works now when the scale and timing of ADR releases remain to be determined through a Review of the Local Plan.

17.8.19 **Issue 7:** Several objectors argue that BROM5D should be extended on its western side and that the Green Belt boundary should be redrawn to follow the line of the M5 motorway at this point. This would amount to an additional 16.2 ha of safeguarded land (making 30.1 ha in total), of which the portion controlled by Mark Giles/Alfred McAlpine developments Ltd is 10.5 ha.

17.8.20 I have already commented when dealing with Issue 2 above that the Green Belt boundary intended by the Council (incorrectly shown on the BDLPPM Proposals Map 3) would not accord with the advice given in Paragraph 2.9 of PPG2. It is arbitrary, does not follow any well-defined physical feature with fields here generally running in an east-west direction, and cuts through the Array Fruit Farm holding. I recommend that the Green Belt boundary be relocated to follow the M5. In such a position it would provide a firm limit to the expansion of Bromsgrove town. It would also reflect the distinction currently drawn between interim Green Belt to the east of the M5 and confirmed Green Belt to the west.

17.8.21 However, while supporting this element I cannot condone the suggestion that BROM5D be extended on its western side as far as the motorway to give greater flexibility. Not only would this bring future development in close proximity to a major source of noise nuisance and pollution, which must significantly limit its potential yield, but it would have a substantial visual impact that would seriously harm the rural setting of the town and reduce scope for structural landscaping. Instead, I recommend that the land be treated as stategic open space and afforded policy protection on that basis. As the Council says, by stopping development short of the motorway the perception that the M5 passes through an essentially rural landscape would, in large measure, be maintained.

17.8.22 **Issue 8:** Westbury Homes (Holdings) Ltd, Persimmon Homes, Bovis Homes Ltd and Barratt West Midlands propose that, in addition to a westerly extension of BROM5 as far as the motorway (dealt with at Issue 7 above), the ADR should also extend to the south to incorporate land bounded by Kidderminster Road, Timberhonger Lane, Whitford Road and the M5 motorway. By adopting the M5 as the Green Belt boundary this would, they say, provide a consistent approach to boundary definition in this sector of the town. It would

also facilitate the identification of a 25ha (approximately) omission site at Whitford Road as an ADR. [I deal with that proposal as a separate issue later in my report, in response to other objections]

17.8.23 I can see the logic of the objectors' argument and I therefore support the exclusion of this additional land from the Green Belt. The BDLP Inspector stated in his report: "It was generally accepted that for landscape and amenity reasons the land between Kidderminster Road and Timberhonger Lane probably should not be developed. That does not mean it necessarily has to be confirmed as Green Belt. If the land to the north of Kidderminster Road were removed from the Green Belt, to form an ADR, it would be sensible to establish a confirmed Green Belt boundary along the motorway, from the north-west corner of Site A (Whitford Road) as far as Fockbury Mill Lane." I concur with that view, believing the land to have little, if any, developmental potential. However, rather than leading me to conclude that it should form an ADR I consider, unlike the previous Inspector, that the majority should more appropriately be allocated as strategic open space. This would allow for a possible future westerly extension of Sanders Park. The remaining areas of the site, like the Hanover International Hotel prominently situated on a knoll along Kidderminster Road, are already substantially developed. I recommend accordingly.

17.8.24 **Issue 9:** Arguments have been put forward that the linear nature of BROM5D would inhibit a satisfactory form of development and fail to integrate with the proposed ADR on the east side of Perryfields Road, while having maximum visual impact on the character and setting of the town. Those are not views I share. Although much narrower in width than some other ADRs, at 100m or so minimum, I am satisfied that there is sufficient depth to achieve a varied and interesting layout together with appropriate structural landscaping. In my opinion it is very unlikely that BROM5D would be developed in advance of BROM5A. When completed both ADRs would, in effect, be seen as a single area of development forming a typical PPG3 'urban extension', with Perryfields Road running through the middle. Moreover, the extended length of BROM5D wrapping around the north-west extremity of the town would afford an opportunity to provide a new sensitively designed urban edge that takes full cognisance of the town's rural setting and protects its character.

Recommendations

17.8.25 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD25, subject to the following further modifications:

(iv) the Green Belt boundary be redrawn to follow the line of the M5 motorway between Fockbury Mill Lane and Timberhonger Lane.

(v) a strategic open space protection policy be applied:

c) to the land between the western boundary of BROM5D and the M5 motorway

d) to the land bounded by Kidderminster Road, Whitford Road, Timberhonger Lane and the M5 motorway (excluding the Hanover International Hotel and adjacent development).

(vi) the Proposals Map be modified (and corrected) accordingly.

(b) That no further modifications be made to the Plan in respect of these objections.

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17.9 Policy BROM11 – Town Centre Zone [Proposed Modification No AREA/MOD28]

984/1383 Wm Morrison Supermarkets plc

Key Issues

17.9.1 (1) Whether the policy limits to 'edge-of-centre' development within the Town Centre Zone should be less rigidly defined.

(2) Whether the explanatory text should be altered to acknowledge the possibility of shopping centres changing their position in the retail hierarchy over time.

Inspector's Appraisal and Conclusions

17.9.2 **Issue 1**: Amongst other matters, Policy BROM11 sets out what is meant by an edge-of-centre location for the purposes of Policy S21 (Out-of-Town Shopping) and the 'sequential' approach to retail development outlined in PPG6. This is defined as the Bromsgrove Town Centre Zone shown on the Proposals Map, excluding the primary (BROM13) and secondary (BROM14) shopping streets. The objector notes that this Zone is in places quite widely drawn but not in others, excluding some areas that would lie within the principal criterion of distance set out in national guidance. Moreover, it is argued that circumstances can change over time which would affect linkages between a possible site and existing town centre shops. Greater flexibility is sought through an indication in Policy BROM11 that other factors outlined in PPG6 may be taken into account in determining whether a development would function as an 'edge-of-centre'

facility. Those criteria (Paragraphs 3.13 and 3.14 of PPG6 refer) would, it is contended, best be included in the Plan under Policy S21.

17.9.3 It seems to me that defining the outer edge of the Town Centre Zone as the limit of edge-of-centre development gives the necessary degree of clarity and certainty to planning policy. In drawing up that boundary the Council has confirmed it took into account such matters as physical barriers, including busy highways, appropriate walking distances and land uses. I agree with the Council that the further modification sought would merely serve to repeat the advice in PPG6 without relating it to the particular circumstances of Bromsgrove town centre. The need to take into account all material circumstances when determining a planning application would I am sure provide an appropriate level of flexibility. That would include any changes that occur over time. I see no reason therefore to define 'edge-of-centre' in a less rigid manner.

17.9.4 **Issue 2:** The objector draws attention to the advice in Paragraph 1.5 of PPG6 which calls upon local planning authorities, in indicating a hierarchy of centres, to recognise that the role, function and relative importance of centres will change over time. This will be the case as some centres grow and others wane in response to a myriad of commercial and non-commercial factors. However, I am confident that the position of Bromsgrove town in the broader retail hierarchy will not significantly alter in relation to neighbouring retail centres within the remaining lifespan of this Plan. Indeed, the BDLPPM is already technically time-expired, with work having commenced on a Local Plan Review. In my opinion, the change in wording of the explanatory text as suggested by the objector would add nothing of material importance to the intention of the Policy.

Recommendations

17.9.5 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD28.

(c) That no further modifications be made to the Plan in respect of this objection.

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17.10 Policy BROM28 – Play Areas and Open Space [Proposed Modification No AREA/MOD41]

1032/1385 Stansgate Planning Consultants
1000/1421 Mr & Mrs G Riley

Key Issue

17.10.1 Whether the Council has omitted to represent BROM28i) on the Proposals Map.

Inspector's Appraisal and Conclusions

17.10.2 The Council's Correction 18 identifies the boundary of BROM28i) (land at Catshill Marshes) on the AREA/MOD41 map. I endorse this correction and consider that it has satisfactorily addressed both objections.

(*NB: this area of land is affected by my recommendation that land at Church Lane, Catshill be designated as an ADR)*

Recommendations

17.10.3 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD41 and Correction 18.

(b) That no further modifications be made to the Plan in respect of these objections.

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18. FINSTALL

18.1 Overview

18.1.1 In the BDLP Finstall was identified as an area appropriate for limited infill under Policy DS5 and a Village Envelope was drawn around it. It is the definition of this Village Envelope on the ground that has caused concern to objectors. Questions have been raised as to whether all the relevant areas of Finstall have been incorporated within the Envelope and whether the Council made an error when they were re-drafting the Proposals Map in light of the previous Inspector's recommendations.

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18.2 Policy FIN1 – Village Envelope [Proposed Modification No AREA/MOD44]

401/1157 P W King
1280/1454 Mr & Mrs Guise

Key Issues

18.2.1 (1) Whether land between the railway and houses fronting Finstall Road and Heydon Road should be included in the Village Envelope but retained as open space.

(2) Whether the Council has correctly interpreted the Village Envelope boundary when redrafting the plan.

Inspector's Appraisal and Conclusions

18.2.2 **Issue 1**: The function of a Village Envelope is to identify sites within the Green Belt where small amounts of infilling might be acceptable. This aim is at variance with the objector's wish that the area identified be retained as open space. I agree with the approach taken by the Council. To modify the Plan in the way proposed would inappropriately raise expectations about the development status of that additional area of land. It would also compromise the characteristic linear form of development that has taken place along Finstall Road and Heydon

Road. I conclude that it is more appropriate to exclude this land rather than create uncertainty by placing the site within the Village Envelope.

18.2.3 **Issue 2**: The Council admits to having inadvertently modified the boundary of the Landscape Protection Area (LPA), but argues that the Village Envelope is correctly drawn in the position indicated by the previous Inspector (using the map referred to at the BDLP inquiry BDC/FIN1/842/5183/1). The objector has questioned the basis and clarity of the BDLP Inspector's recommendation, with the main bone of contention being the exact position of the boundaries of the Village Envelope and the LPA.

18.2.4 The Council considers that the rear garden of 100 Finstall Road would not be appropriate for development. Additional buildings in that location would comply neither with Green Belt (GB2) nor Village Envelope (DS5) Policies. Consequently, it is argued that exclusion of part of the rear garden of No 100 from the Village Envelope would have no implications for future development. I accept this. Nevertheless, I can see no reason why the Village Envelope should bisect the rear garden along the line of the patio. This rear garden is not especially deep. It would be more logical in my view to incorporate the whole of the domestic curtilage within the Village Envelope boundary - which is what I feel the BDLP Inspector intended.

18.2.5 As regards the appropriate boundary for the LPA, I do not believe that any part of this domestic curtilage merits inclusion. Such areas are designated on the basis of their special character and quality of landscape. That is not the case here where there is a physical demarcation between open countryside and the village proper. I recommend accordingly.

Recommendations

18.2.6 (a) That Proposed Modification AREA/MOD44 be not made.

(d) That the Village Envelope and Landscape Protection Area boundaries be drawn at the interface of the curtilage of 100 Finstall Road and fields 0002 and 0007.

(e) That no further modifications be made to the Plan in respect of these objections.

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19. FRANKLEY

19.1 Overview

19.1.1 The majority of the urban area of Frankley has been transferred to the administrative control of Birmingham City Council. Bromsgrove District Council still retains control of the hinterland to the north and east of the settlement. In the BDLP a site was identified for the provision of an equipped children's play area due to the limited provision in Frankley. Whilst this site was not designated as an ADR in the Deposit version of the Plan, it has subsequently been identified by the Council for this purpose. Objectors have reiterated concern over the acknowledged shortage of formal open space in Frankley and consider that designation of FR4 as an ADR would further undermine this lack of provision.

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19.2 Policy FR4 – Areas of Development Restraint [Proposed Modification No AREA/MOD48]

295/1111	Frankley Parish Council
975/1381	Billingham & Kite Ltd
1014/1385	Stansgate Planning Consultants (various clients)
1104/1391	Birmingham City Council

Key Issues

19.2.1 (1) Whether designation of this site as an ADR is in conflict with the acknowledged need for additional play area provision in Frankley.

(2) Whether the land would be transferred to Birmingham City Council after development has taken place.

(3) Whether the site should be used for industrial/employment purposes.

(4) Whether the site is appropriate as an ADR in terms of sustainability and Green Belt considerations.

(5) Whether the site is in fact contained on three sides by existing development.

Inspector's Appraisal and Conclusions

19.2.2 **Issue 1**: This site of 6.6 ha is capable of contributing to the supply of ADR land in the District. In my view it would be unreasonable to reserve the whole of it for the provision of an equipped children's play area. Indeed, the Council has indicated that it was never the intention for the entire site to be used for that purpose. Although principal responsibility for open space provision in Frankley has now passed to Birmingham City Council, Bromsgrove District Council has recognised through Policy FR3 that there is a need to make some provision at this site. I see no reason why the land should not accommodate both uses. To clarify the situation, I consider that a sentence should be added to the explanatory text of Policy FR4 reiterating the Council's continued commitment to some formal open space/play area facilities on this site and cross-referencing to Policy FR3.

19.2.3 **Issue 2**: The administrative status of this site is a matter for the Boundary Commission. It is not a land-use issue that falls to be addressed through this inquiry.

19.2.5 **Issue 3:** ADRs are capable of being developed for either residential or employment purposes. The specific use of this site would be resolved through the subsequent Local Plan Review as and when the land is allocated for development. It is not a matter for determination at this stage.

19.2.6 **Issue 4**: The site is located in a transport corridor as defined in the County Council's Transport Corridors Study, being within the 5 minute drive isochrone of Longbridge railway station. I note also the intention of CENTRO to reopen the spur line between Longbridge and Frankley, with completion programmed for 2005/06. This would fit with the time-scale of ADR provision and subsequent release after a Local Plan Review. It indicates to me that Frankley is a a potentially sustainable location for future development.

19.2.7 With regards to the adequacy of existing services and facilities, there are a number of local centres in Frankley in reasonable proximity to this site. The closest shopping facility is some 600m away, with other community facilities and a small shopping centre approximately 800m distant.

19.2.8 It has been suggested that this site fulfils 2 Green Belt purposes: checking unrestricted sprawl and safeguarding the countryside from encroachment. I agree with the Council that although there would be some encroachment it would be very limited and would not amount to unrestricted urban sprawl. In light of its sustainability credentials, future development here would in my opinion represent an appropriate rounding off of development at Frankley.

19.2.9 **Issue 5**: One objector has commented that the site is only contained by development on two sides, and that further open land exists to the south. While that is indeed the case, the latter area is designated as playing fields which are afforded protection through PPG17 (Paragraphs 41-44) and Policies of the Birmingham UDP (Environment 3.53-3.61). In view of the current deficiency of open space in Frankley, it seems highly unlikely that a precedent would be set for development of that land.

Recommendations

19.2.10(a) That the Plan be modified in accordance with Proposed Modification AREA/MOD48, subject to the following additional modification:

The explanatory text to Policy FR4 be augmented to make clear the Council's continued parallel commitment to the provision of an equipped children's play area on part of the site in accordance with Policy FR3.

(c) That no further modifications be made to the Plan in respect of these objections.

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20. HAGLEY

20.1 Overview

20.1.4 Hagley is identified under BDLPPM Policy DS4 as a settlement where limited development can occur during the Plan period.

20.1.5 To cater for possible longer-term development needs, the Council has selected 3 ADR sites on the outskirts of Hagley. Of those, HAG2 was endorsed by the BDLP Inspector, having previously been excluded from the Green Belt in the Hagley/Clent Local Plan adopted in August 1991. No further objections have been received to that designation. HAG1 and HAG2A are the concern of this inquiry. In October 2000, outline planning permission was granted on appeal for residential development of the majority of HAG1. In light of that decision, I recommend that the whole of the site be allocated for housing under Policy S2. HAG2A was not included in the Deposit Version of the BDLP although it has subsequently been identified as safeguarded land. I recommend that it be confirmed as an ADR and excluded from the Green Belt.

20.1.6 Elsewhere in my report I consider various 'omission' sites at Hagley. I recommend that land south of Kidderminster Road also be designated as an ADR.

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20.2 Policy HAG1 – Areas of Development Restraint [Proposed Modification No AREA/MOD49]

311/1116	R Shaw
524/1214	EV Smith
537/1221	JH Gemmill
549/1229	NJ Hemmings
1156/1390	CPRE
308/1413	Charles Collier
1246/1440	JH Gemmill (and petitioners)

Keys issues

20.2.1 (1) Whether HAG1 should be retained as an ADR or made into a housing allocation, in light of the appeal decision granting outline planning permission for residential development over the majority of the site.

(2) Whether the balance of the site without planning permission (0.55ha) should remain as an ADR or be treated as a housing allocation.

(3) Whether the wording of the supporting text should be altered to make it clear that: "It will also be necessary to provide a satisfactory, new access to the site *from the main road distributor network.*"

(4) Whether the site is suitable for development given the level of service provision in Hagley, highway safety concerns, access constraints and the effect that development would have on the 'atmosphere' of the village.

Inspector's Appraisal and Conclusions

20.2.2 **Issue 1**: The planning appeal was made under Section 78 of the Town and Country Planning Act 1990 against a failure to determine the application within the prescribed period. Although a decision notice was subsequently issued by the Council, the basis of the appeal remains as stated. I note that an objector has claimed that the decision is flawed because of ambiguity over the issue of access. However, the Local Plan process is not a means by which to reconsider this matter. The appeal decision has not been challenged through the normal procedures and remains extant. It is therefore a material consideration before this inquiry.

20.2.3 I agree with the Council that the grant of outline planning permission for residential development over the majority of this site renders many of the objectors' concerns of no practical effect. They have been overtaken by events. It would, in my opinion, be contradictory to now treat HAG1 as safeguarded land. ADR designation, by definition, implies a longer timescale for implementation. That can no longer be controlled by the Council through the Local Plan Review process. The Council too has acknowledged this and, through further written representations, has suggested that the area of HAG1 with outline planning permission for residential development should now be shown as a housing allocation. I concur with that approach.

20.2.4 **Issue 2**: I am satisfied that there would be little value in retaining as an ADR the residual area of HAG1 that does not have outline planning permission. Given the recent appeal decision, it is likely that a future planning application in respect of this site would gain approval from the Council. It would therefore be inappropriate to hinder the development process by safeguarding this small area of land until the Review of the Local Plan. I conclude that the whole of HAG1 should be deleted from BDLPPM Policy DS8 Appendix 3A and should be designated as a new housing allocation under Policy S2.

20.2.5 **Issue 3**: In light of the above conclusions, I consider that concern about the wording of the supporting text is no longer relevant.

20.2.6 **Issue 4**: There is a general duty on service providers to ensure that essential infrastructure, facilities and services are planned for and in place to support development when it occurs. While I appreciate the concerns of objectors regarding the loss of 'village' atmosphere, this is not a tangible land use planning consideration. Hagley is, in my opinion, of sufficient size to absorb this level of future development without serious detriment to its character. Further concerns focus on the access and highway safety matters that were dealt with at the recent appeal. I note that in addressing the relevant issues the Inspector concluded that "the absence of a new access and the modest additional environmental harm caused by development traffic negotiating the localised bottleneck in Church Street are [not] sufficient to outweigh the otherwise close compliance of the appeal scheme with the provision of the emerging development plan" (appeal ref: APP/P1805/A/00/1044891 Paragraph 41).

Recommendations

20.2.7 (a) That Proposed Modification AREA/MOD49 be not made.

(d) That the whole of HAG1 be deleted as an ADR and allocated instead as a housing site under Policy S2. - the Proposals Map and Appendices 3A and 4 to be modified accordingly.

(e) That no further modifications be made to the Plan in respect of these objections.

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20.3 Policy HAG2A – Areas of Development Restraint [Proposed Modification No AREA/MOD 50]

301/1112 Mrs S M Hill
302/1113 Mr J P Gowar
305/1114 F G M Ellis
307/1115 Mrs R B Lawrence
313/1116 R Shaw
315/1117 Mr & Mrs Perry
317/1118 R Porter
318/1119 Mr & Mrs R W Johnson
…….

(In the interests of economy only a few of the objections to this Policy/Proposed Modification are set out above. A complete list of objections is given in Appendix F)

Key Issues

20.3.1 (1) Whether the principle of ADR designation is obsolete in light of the provisions of PPG3, the WCSP and regional planning guidance.

(2) Whether population estimates require up-dating and would have an impact on the necessity for ADR designation.

(3) Whether this ADR proposal was correctly advertised and consulted upon.

(4) Whether references to Hagley should be construed as relating to the parish or settlement.

(5) Whether this site should be designated as an ADR and excluded from the Green Belt.

(6) Whether the phrase 'long term' in the explanatory text requires clarification.

Inspector's Appraisal and Conclusions

20.3.2 **Issue 1**: A number of objectors have argued that the ADR policy is outmoded having regard to national, regional and strategic policies that seek to concentrate development on previously used land. I have considered general issues surrounding Policy DS8 in Paragraphs 1.2.1-1.2.51 of my report and have not found the allocation of ADR land to be inappropriate or unnecessary. The WCSP was prepared on the basis of the most up-to-date national and regional planning policy guidance. Policies D.40 (Green Belt Boundary Definition) and D.41 (Areas of Development Restraint) maintain a need to safeguard land for longer-term development beyond the Plan period. Moreover, Worcestershire County Council has confirmed that the Proposed Modifications would not give rise to a conformity problem.

20.3.3 A further concern of some objectors is that Bromsgrove District has not met the Government's overall target that 60% of additional housing be provided on previously developed land. I note, however, the EiP Panel's endorsement of a 40% brownfield target for Bromsgrove District to 2011. While efforts are being made to encourage the re-cycling of sites, the unique circumstances of the District (and evidence from the WCC Urban Capacity Study) allow for a lower figure than the 60% target for 2008 indicated in PPG3.

20.3.5 **Issue 2**: Changing population estimates and their implications are matters for the Review of this Plan. At that stage, the latest demographic projections together with other material considerations will lead the Council to decide on the need for specific land-use allocations. An objector has asked for confirmation that if HAG2A is designated as an ADR it will not be developed before 2016 and has sought clarification of the circumstances under which the Council would relax its control. Policy DS8 makes it clear that ADR land will be subject to strict Green Belt policy until such time as its release can be justified. Decisions on need and timing will take place through the Local Plan Review. Subsequent planning applications for the development of sites will be subject to assessment against a range of development control policies and national guidance, as well as the sustainability provisions of the WCSP. Any such proposals would be advertised in accordance with the Regulations.

20.3.6 **Issue 3**: The HAG2A site was subject to objection at Deposit stage. It was considered by the BDLP Inspector who concluded that Hagley has distinct advantages as a possible location for some future development and that this site represents an appropriate small extension to HAG2. The Council has accepted that recommendation after carrying out a comprehensive review of the District to identify more safeguarded land. Following on from that process, I am satisfied that the Proposed Modifications were correctly publicised in accordance with the relevant statutory formalities.

20.3.7 **Issue 4**: An objector has sought clarification as to whether references to Hagley are concerned with the settlement or parish. Policy HAG2A relates exclusively to the site known as Algoa House, Western Road, Hagley as shown on the Proposals Map. Other references to Hagley in the Plan are concerned with the settlement of Hagley, as delineated on Proposals Map 2 and 3. Land in the Parish of Hagley not inset from the Green Belt will continue to be subject to the relevant countryside/Green Belt policies.

20.3.8 **Issue 5:** I have already commented on the general suitability and sustainability of Hagley for ADR provision when looking at objections to Policy DS8 (see Paragraphs 1.6.3-1.6.10 of my report). I recognise that there is no overriding policy imperative to find significant additional quantities of safeguarded land specifically in Hagley. Nevertheless, I do believe this settlement has a number of advantages in terms of its size, public transport connections and variety of services and facilities. This view is consistent with that of the BDLP Inspector.

20.3.9 Some objectors have identified other locations, mainly Perryfields, Bromsgrove, as more suitable for long-term growth. I have considered the individual merits of those greenfield sites in relevant sections of this report. In comparison with the much larger BROM proposals, which are intended to accommodate the majority of development in the District for the next 15-20 years, HAG2A (1.6ha) represents a very modest addition to the adjacent ADR. And being a previously

developed domestic curtilage it is particularly appropriate for future development to a greater density.

20.3.10 The Council has accepted that virtually all ADRs will lead to a degree of encroachment into the countryside. The objection site is unexceptional in this regard. Future development in this location would not cause settlements to merge, other than Hagley and West Hagley which have already coalesced and form, in effect, a single unit. Neither would it lead to the sprawl of a large built-up area. The BDLP Inspector indicated that in his opinion the character of this site was little different from the adjoining domestic curtilage of 'Strathearn'. I agree and consider that any harm to the functioning of the Green Belt would be minimal.

20.3.11 On the matter of potential visual intrusion, the previous Inspector concluded that it would be a very limited problem. When viewed from higher ground to the east of Hagley development would be seen against a backcloth of existing housing in fairly close proximity. I consider that designation of this site as safeguarded land would round off the settlement and provide strong defensible boundaries for the Green Belt. Some objectors fear that its identification as an ADR would create increased pressure for future development of good quality agricultural land. However, farmland to the east and south of the site would continue to be protected through strict Green Belt policies.

20.3.12 While the Highway Authority has raised no objection to this proposal, a considerable number of local residents have voiced concerns in respect of traffic and highway safety issues. Reference has been made to existing traffic problems in Hagley which it is suggested would be compounded by the proposal to designate several ADRs in this locality. Particular concern has been expressed about the current levels of congestion on the A456 and A491, and traffic using the residential Western Road and Newfield Road. I note that an appeal in respect of land south of Kidderminster Road (Ref: APP/P1005/A/96/270963) was dismissed partly on grounds of a dangerous access onto the fast and busy A456. However, similar traffic matters were examined by the BDLP Inspector in respect of HAG2. He did not consider these to be such a constraint as to affect the principle of ADR designation. I take the same view with regard to HAG2A. Nevertheless, I support the Council's intention to consider the release of both ADRs together. Comprehensive planning would increase the options available in relation to transportation and access issues.

20.3.13 Other traffic related matters have been brought to my attention. There have been calls for deferment of the ADR proposals until traffic management schemes have been put in place and the Kidderminster-Blakedown-Hagley by-pass constructed. The BDLP Inspector concluded that whether or not the by-pass goes ahead need not prevent the designation of HAG2. I reach the same conclusion in respect of HAG2A. The role of the current exercise is to consider the generic use of land. I see no 'in principle' highway constraint that would preclude development of

HAG2A. Details of access arrangements and means of accommodating the volumes of traffic likely to be generated by specific land uses are matters for the Highway Authority to address, as and when the land is allocated for development following a Local Plan Review.

20.3.14 As regards my recommendation concerning the ADR 'omission' site to the south of Kidderminster Road (Paragraph 1.6.163 refers), strategic development of the 3 ADR sites together, totalling 22.6ha, would allow some employment uses to be accommodated, thereby helping to redress the imbalance between houses and jobs in Hagley.

20.3.15 Objectors have highlighted a variety of ancillary problems. They include inadequate drainage and sewerage systems, limited capacity of local schools, lack of recreation facilities, insufficient parking, and poor library and health services (doctors, dentists, access to emergency treatment). However, I have no reason to believe that such matters cannot be adequately dealt with by service providers. By their very nature ADRs are intended to provide for longer-term development needs, affording lead time for the planning and implementation of infrastructure and services. The Council says that planning obligations under Section 106 of the Town and Country Planning Act 1990 would be sought from developers, where appropriate, to secure contributions towards new or enhanced community facilities.

20.3.16 Hagley, like many of the settlements in the area, experiences a considerable amount of commuting to the conurbation for work. HAG2A is well-placed in relation to a choice of public transport modes to reduce the need for, dependence on, and distance travelled by the private car. It is within the 5 minute drive and 15 minute cycling/walking isochrones of Hagley railway station, and Kidderminster Road is well served by two bus routes. Moreover, there is a good selection of shops and other local services conveniently situated along Worcester Road, as well as both primary and secondary schools in the locality. In terms of its accessibility, HAG2A is a sustainable location.

20.3.17 Other concerns such as environmental impact, risk of flooding and potential loss of wildlife habitat would be addressed at the detailed planning application stage and in broader measure through a development brief prepared by the Council.

20.3.18 Some residents fear that the growth of Hagley would have an adverse effect on the present village atmosphere and the quality of life of its residents. While I can appreciate those worries they are not, strictly speaking, tangible land use matters. They do not go to the heart of whether a site should be identified as an ADR on planning merit. And in a similar vein, issues such as a possible increase in crime, vandalism and pollution do not affect the principle of ADR designation. They are all capable of mitigation at the detailed planning stage.

20.3.19 To sum up, the objection site represents a modest extension to a longstanding ADR which was originally designated in the Hagley/Clent Local Plan (1989). HAG2A is in a sustainable location. Its identification as an ADR would not seriously compromise Green Belt functions. Furthermore, the land is not unduly constrained. The need for this ADR constitutes the 'exceptional circumstances' necessary for the release of confirmed Green Belt land.

20.3.20 **Issue 6**: An objector has requested clarification of the phrase 'long term' as used in the supporting text: "The Inspector [considered] … this site could provide an additional amount of land for possible long-term use without compromising Green Belt interests….". In light of my recommendation to endorse HAG2A as an ADR, it would be appropriate to delete this somewhat unclear statement from the supporting text. I set out in my recommendation alternative wording similar to that used elsewhere by the Council when promoting ADR sites recommended by the Inspector.

Recommendations

20.3.21 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD50, subject to the following additional modification:

The explanatory text be altered by substitution of the following for the 2nd and 3rd sentences of Paragraph 28.3:

"It has been designated as an ADR in accordance with the recommendations made by the Inspector holding the inquiry into the BDLP."

(c) That no further modifications be made to the Plan in respect of these objections.

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21. WYTHALL

21.2 Overview

21.2.1 This composite settlement is located in the north-east sector of the District close to the administrative boundary with the Metropolitan Borough of Solihull. Two ADR sites are promoted by the Council in the Grimes Hill area, combined with support for an associated 'park and ride' facility in the vicinity of Wythall railway station. While accepting Policy WYT 10 (Park and Ride) and ADR site WYT15, I recommend that ADR site WYT14 be omitted and an alternative area of safeguarded land at Bleakhouse Farm be substituted. I do not support the very much larger ADR 'omission' site proposed at Shawbrook. I find in favour of the Council's proposal for a site for a new church in Silver Street.

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21.2 Policy WYT10 – Park and Ride Facility at Wythall Station [Proposed Modification No AREA/MOD65]

1221/1247 A J Thomas
1222/1248 P M Thomas
1223/1249 M L Thomas
593/1253 Mr & Mrs Hancocks
596/1254 A J Beedham & Mrs S S Bryan
599/1255 R E Coles
602/1256 Mrs B M Coles
…….

(In the interests of economy only a few of the objections to this Policy/Proposed Modification are set out above. A complete list of objections is given in Appendix F.)

Key Issues

21.2.1 (1) Whether there is a need for a park and ride facility at Wythall.

(2) Whether a park and ride scheme would result in unacceptable increases in levels of traffic and congestion and have a negative impact on the local environment.

Inspector's Appraisal and Conclusions

21.2.2 **Issue 1**: A significant number of objectors have questioned the demand for a park and ride facility at Wythall, stating that the current rail service is characterised by poor and infrequent operations and low patronage. It has been suggested that a comparison be drawn with other similar facilities in the locality that are available but underused. Whitlocks End, Shirley and Earlswood have all been cited as examples of stations which offer more frequent services but still have under-utilised parking facilities. In the case of Whitlocks End, a survey undertaken on various weekdays 8-15 May 2001 showed between 25 and 43 empty car parking spaces out of a total of 44 spaces. Moreover, it is argued that a far larger bus-based park and ride scheme at the Maypole, refused planning permission by Bromsgrove District Council for Green Belt reasons, would have better served many of Wythall's residents.

21.2.3 I appreciate those concerns and the need to take a holistic view. Nevertheless, a park and ride scheme at Wythall would be in line with government guidance and District and County strategies (Structure Plan Policies T.6 and T.7) to integrate public and private transport by bringing forward local and strategic park and ride schemes at existing railway stations. In this regard, I note that the Local Transport Plan for Worcestershire 2001-2006 links demand with improved station access and parking provisions. It sets out a minimum standard for public transport interchanges of 50 car parking spaces at all railway stations in Worcestershire. Key requirements for Wythall are identified as car parking, a bus shelter and cycle parking. That Plan was drawn up in the light of guidance issued by the DETR, incorporating advice from the Commission for Integrated Transport and other bodies. While I recognise that many local residents are within easy walking distance of Wythall railway station, a park and ride facility would offer a sustainable travel option for others residing further away, thereby potentially reducing the traffic flows between the settlement and the conurbation. It would enhance the viability of the station, and increase the likelihood of better services being provided. As regards Whitlocks End, that railway station is close to the substantial Dickens Heath village currently under construction in neighbouring Solihull but as yet only 25% complete. When fully built out that scheme is likely to result in much greater use of rail facilities by residents - including, possibly, Wythall station.

21.2.4 Land in the vicinity of Wythall station has permission for recreational use. I am told that a start has been made on site. The Council has signalled its intention, should the development proceed, to negotiate dual-use parking facilities. Alternative sites would also be examined. I consider that both courses of action would be appropriate.

21.2.5 **Issue 2**: Many objectors have expressed concern that a park and ride scheme would attract additional traffic from outside the settlement, increasing the use of narrow and potentially hazardous lanes around and within Wythall. It is claimed that this would increase congestion, overload the existing road system and adversely affect highway safety. They point to a steady increase in traffic along Station Road, Norton Lane, Lea Green Lane and Lowbrook Lane, with traffic volumes confirmed by a local survey, making it difficult for some residents to access and leave their properties at peak times. Norton Lane and Selsdon Close, in particular, have been identified as having dangerous access points.

21.2.6 I concur with the previous Inspector in his acknowledgement that existing traffic patterns would alter. While a park and ride scheme might lead to inconvenience in a few locations, elsewhere it would bring substantial benefits by reducing the length of car journeys in favour of greater rail travel. It is I believe significant that the Highway Authority has not only raised no objection to this proposal but is actively encouraging the provision of car parking facilities at Wythall railway station. I agree with the Council that detailed matters of access would need to be considered at the time of a planning application.

21.2.7 There are further concerns that a park and ride facility would encourage vandalism and theft, in addition to creating noise and lighting disturbance, which could adversely affect property values in the area. While I am sympathetic in relation to such negative impacts, the effect on house values is beyond the scope of planning control. Other issues such as noise, lighting and designing to minimise crime will be of importance at the more detailed planning application stage.

21.2.8 One objector has stated that the area provides important habitat for frogs and newts. Newts are a species afforded protection through European legislation, the Wildlife and Countryside Act and PPG9: Nature Conservation. Their existence will be of significance in the consideration of any specific planning application, but it does not affect the principle that the Council will support a park and ride facility in the vicinity of the railway station.

21.2.9 In light of the above assessment, I agree with the BDLP Inspector that the overall effect of this Policy would be beneficial and that it should remain as currently drafted.

Recommendations

21.2.10 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD65.

(b) That no further modifications be made to the Plan in respect of these objections.

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21.3 Policy WYT11 – Site for New Church [Proposed Modification No AREA/MOD66]

575/1245 Diocese of Birmingham & Wythall PCC

Key Issue

21.3.1 Whether Site A or Site B is the most appropriate location for a new parish church in Wythall.

Inspector's Appraisal and Conclusions

21.3.2 St Mary's Church, Chapel Lane, Wythall was closed in 1986 and declared redundant in November 1992. It was in a poor structural condition and, being located on the opposite side of Wythall by-pass, was badly situated in relation to most of Wythall which had grown substantially in size in other directions. The building has subsequently been sold and has been renovated for office use. For the past 15 years the congregation has had no settled base for worship. Church services and other functions have been held in a variety of locations, including school halls, and have necessitated the sharing of accommodation with other religious denominations. Throughout that time the Diocesan Board has been searching for a new church site.

21.3.4 The District Council has identified, through Policy WYT11, a 0.47 ha site (referred to here as Site B) for a new church on part of the playing field of the former Silvermead Primary School, situated at the junction of Silver Street and Wilmore Lane. The Church passed over the opportunity to purchase the entire site from the County Council with the result that the school buildings were sold off to a developer and have now been extended/converted to form residential units. In consequence the original allocation in the 1993 Deposit Draft Plan has been reduced. The land lies within the confirmed Green Belt on the south-west side of the Drakes Cross/Hollywood part of Wythall.

21.3.5 The Church does not consider that particular site to be suitable for an investment of more than £1.5 million. Not only is it said to be too small to accommodate the single storey accommodation and range of facilities envisaged, but it is located away from the focal point of the settlement. Instead, the Church is promoting its

own larger site (Site A) at the junction of Silver Street and Alcester Road, approximately 270m to the east of Site B and also in the confirmed Green Belt. Additional land has recently been purchased to bring the area of Site A up to 1.56ha. A validated, random survey of parishioners carried out by the Vicar and Parochial Church Council (PCC) confirms the community's preference for Site A.

21.3.6 A similar objection was considered by the BDLP Inspector. He concluded that while both sites had disadvantages, those of Site A were significant in relation to Green Belt purposes and would not be outweighed by the benefits accruing to the community. He found in favour of Site B, subject to further slight modification, if necessary, of the site boundary. I note that an appeal against refusal of an application for the Church's preferred site was dismissed in 1990 (Ref: T/APP/P1805/A/90/157143/P3), and that a planning application for a new church on Site B, submitted by a developer without the support of the Parish or Diocese, was approved in 1998. As regards the latter, I accept that the need here in Wythall is specifically for a parish church which has different locational requirements from other denominations or groups that are able to spread over a wider area.

21.3.7 The objectors maintain that there have been changes in circumstances since the previous Inspector reported. Amongst other matters, these include a clarification of the status of Canon Law through a letter dated 4 June 1997 from the then Head of the Planning Policies Division of the DoE. The letter states: "Canon Law imposes a legal duty on a Bishop to provide a place of worship in every Parish in his Diocese; this duty is carried out in each benefice by a vicar or rector, who is in turn required to reside in his or her benefice for the care of all the people. The legal advice we have received is that it is possible for Canon Law to be a material consideration in a particular case." The Pastoral Measure 1983 requires the Bishop to approve a place of worship. In this case, the Bishop has refused to sanction Site B as a site for a new parish church. He is supported in this by the Vicar, 2 Archdeacons and the PCC. Consequently, the objectors say that the WYT11 allocation in the BDLPPM is unrealistic and incapable of implementation.

21.3.8 I acknowledge that the Bishop has effectively vetoed Site B. That decision and the possible consequences flowing from it are matters for his judgement. It is not a position that is irreversible. The Bishop is not in breach of any pastoral measure, so long as he makes provision for worship to take place within the parish. Canon Law has not in fact changed since the time of the last inquiry. Moreover, the Church of England is required to comply with the same body of planning legislation as every other organisation or individual. It does not have freedom to determine its own development plan allocations. Consequently, while I accept that the Bishop's decision is a material factor to be weighed in the balance it is not, to my mind, of such significance as to override, by itself, the relative planning merits of the 2 sites. I turn now to examine these.

21.3.9 Looking first at Green Belt arguments, I concur with the previous Inspector that because the erection of a church on either site would represent inappropriate development in the confirmed Green Belt, any such proposal requires very clear justification. Broad agreement exists between the parties that there is little prospect of finding an alternative non-Green Belt site in Wythall. Moreover, it is abundantly clear to me from the evidence presented that the Church fulfils a very important, if not pivotal, role in the community. The range of activities undertaken and the facilities provided/supported are legion. Significant improvements would undoubtedly flow in the delivery of those services from having a permanent purpose-designed church centre. In my opinion those community benefits constitute the very special circumstances that justify, in principle, the use of Green Belt land.

21.3.10 Having said that, it is incumbent on the District Council to seek to minimise the impact of development on the Green Belt. Both sites identified assist in safeguarding the countryside from encroachment. Site A also helps maintain separation between Drakes Cross/Hollywood and Grimes Hill. However, whereas Site B is fairly modest in area and partially contained by existing buildings on several sides, Site A is much more extensive, prominently situated and directly relates to a larger expanse of open countryside to the south-west. In terms of fulfilling Green Belt purposes, Site A is therefore far more significant. Development in that location would have a considerably greater impact on Green Belt functions.

21.3.11 The objectors contend that the WYT11 allocation is too small and would result in a very cramped, urban appearance. Just one illustrative scheme has been prepared. This shows that the building, 96 car parking spaces, paths and integral landscaping envisaged would cover 3,898 sq m, compared with a total site area of 4,763 sq m for Site B and 15,586 sq m for Site A. It is argued that development would have to be 'shoehorned' to fit WYT11 which would, in any event, have to be extended to achieve adequate parking at the rear. However, this presupposes that the building would be single storey only. There is no reason in my view why some of the required facilities could not be accommodated at first floor level or a different scheme altogether drawn up to take specific account of site features and constraints. As regards car parking, I accept the desirability of providing a reasonable amount of parking on-site to cater for weddings, funerals and other special events, in order to avoid nuisance or disruption to neighbouring occupiers. In this regard the long 'tail' at the rear of the site is not particularly usable. The District Council has, however, previously indicated its willingness to enlarge the site on its southern side if necessary. Moreover, there could be opportunities to share car parking arrangements with other organisations in the vicinity. I note, for example, that Wythall Community Centre directly opposite the site has about 190 parking spaces available.

21.3.12 It is my view overall that Site B is not so constrained in terms of size or shape as to make it impracticable or unsuitable for the provision of a parish church with

ancillary community facilities. Site A, in contrast, is more than 3 times the size of Site B. Though providing the potential for a landscaped rural setting, such a low plot ratio would represent a very inefficient use of Green Belt land.

21.3.13 One of the claims put forward in favour of Site A is that it would create a focal point for Wythall, which is a very dispersed settlement, uniting disparate parts at Drakes Cross/Hollywood and Grimes Hill. The need for such a centre was recognised by a Structure Plan EiP Panel more than 25 years ago. However, I conclude elsewhere in my report when dealing with other objections that it is important for Green Belt reasons to maintain the band of open countryside separating these areas. While I can understand the Church's wish to have a building prominently situated at a highly visible crossroads, I do not feel that it is an essential locational requirement. In terms of functioning there is little to choose between the 2 sites, given that they are only 270m (approximately) apart. Likewise, I attach little weight to the accessibility argument that Site A is on a bus route, whereas Site B is not.

21.3.14 Drawing together my views on this matter, I conclude that very special circumstances exist to support development in the Green Belt. WYT11 (Site B) is a satisfactory allocation, being of sufficient area (subject to further slight modification of the boundary) to accommodate a parish church and related facilities, including a reasonable amount of car parking, without serious harm to Green Belt purposes. Site A, on the other hand, would have an unacceptable impact on the functioning of the Green Belt and would represent a relatively inefficient use of land. Even though the Church is adamant that Site B does not meet their requirements, I can see no merit in removing the site specific notation while leaving the general requirement of WYT11. The various changes in circumstances since the previous Inspector reported - namely, clarification of the status of Canon Law, the Bishop's refusal to license Site B for a parish church, and the community questionnaire survey undertaken - are not so compelling as to affect the balance of my conclusions.

Recommendations

21.3.15 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD66, subject to a modest enlargement of the site area on its southern side to accommodate essential facilities.

(b) That no further modifications be made to the Plan in respect of this objection.

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21.4 Policy WYT14 – Areas of Development Restraint [Proposed Modification No AREA/MOD67]

579/1002 The Hagley Estate
581/1075 Crest Nicholson Residential (Midlands) Ltd
576/1246 J Tomlinson
582/1247 A J Thomas
584/1248 P M Thomas
586/1249 M L Thomas
588/1250 D Hood
590/1251 Ms T Hood
…….

(In the interests of economy only a few of the objections to this Policy/Proposed Modification are set out above. A complete list of objections is given in Appendix F.)

Key Issues

21.4.1 (1) Whether the site is suitable as an ADR and should be excluded from the Green Belt.

(2) Whether the traffic likely to be generated can be satisfactorily accommodated on the local road network.

(3) The impact of development upon infrastructure, services and community facilities.

(4) The effect of the development on the character of the village, land values and the quality of life enjoyed by local residents.

(5) The effect on nature conservation interests.

Inspector's Appraisal and Conclusions

21.4.2 **Issue 1:** WYT14 is the larger of two ADR sites promoted by the Council in the Grimes Hill area of Wythall. The supporting text indicates that it also provides an opportunity to create a station car park. The site extends to 5.1ha and is bounded by residential development fronting Norton Lane to the south, the railway line and Wythall station to the west, and the River Cole to the east. The latter also marks the District boundary with Solihull Metropolitan Borough Council. Although currently unused, the site is alleged to have formerly been a refuse tip. Planning permission exists for development of the land for recreational purposes.

21.4.3 The site lies in confirmed Green Belt and fulfils 2 main Green Belt purposes. Like most ADRs it assists in safeguarding the countryside from encroachment. But more importantly in this case, it separates neighbouring settlements and prevents them from merging into one another. Tidbury Green is located to the east of Wythall in very close proximity to Grimes Hill. The BDLP Inspector noted that except for a very short stretch in the vicinity of Lowbrook Bridge, development at Grimes Hill already almost reaches the housing at the west end of Tidbury Green, at the southern or bottom edge of the U-shaped gap. That relationship would become even more critical if the 2 extensive ADRs identified in the Solihull UDP at Tidbury Green were developed in due course. The existing gap would either be obliterated altogether or only a very narrow wedge of open land remain to prevent coalescence. In these circumstances, I consider the Green Belt role of WYT14 to be absolutely fundamental. That was also the conclusion of the BDLP Inspector and is a view shared by many of the present objectors.

21.4.4 The Council says that in order to maintain an effective green wedge between Wythall and Tidbury Green discussions have already taken place with Solihull MBC with the objective of keeping a tract of open land along the line of the River Cole free of development on both sides of the administrative boundary. This would not in my opinion be sufficient to maintain the integrity of each settlement, even allowing for the presence of further open land to the north of WYT14. It would result, to all intents and purposes, in the coalescence of Grimes Hill and Tidbury Green with just a green thread of open space wandering through the centre.

21.4.5 My attention has been drawn to a planning permission granted in July 1990 for recreational use of this land. By virtue of a start having been made on site, I am told that the permission remains extant. It would provide a complex of indoor and outdoor leisure facilities for horse riding, tennis, fishing, squash, indoor cricket, ice/roller skating and snooker - far in excess of what would today be considered acceptable under Green Belt policies on sport and recreation. If carried through to completion, the scheme would undoubtedly have an effect on the openness of the site although, as recognised by the previous Inspector, a considerable amount of the land would remain free of buildings. Contrary to the view expressed by the Council, I believe that residential development in its place would be likely to have an even greater visual impact and degree of urbanisation. There would I feel be considerable pressure to achieve maximum site coverage and I am not persuaded that designating an ADR would afford any greater measure of control.

21.4.6 I conclude that WYT14 is open to substantial objections on Green Belt grounds. Unlike WYT15, the site is not particularly well-contained. In my view the appropriate boundary for any expansion of Grimes Hill on its eastern side is the railway line.

21.4.7 Turning now to look at matters of sustainability, I am satisfied that Wythall is a settlement that is suitable to accommodate some longer-term growth. Not only

does it have a railway station offering a choice of transport mode but it possesses a range of local services capable of satisfying daily needs. As the BDLP Inspector remarked: "Taken as a whole, the Wythall area has good transport links with the conurbation…There is a reasonable range of local facilities…I have no doubt that, if additional ADR land is needed, this is a locality which should be seriously considered."

21.4.8 Focusing on WYT14 specifically, this site adjoins Wythall railway station and is therefore in a prime position to offer an alternative mode of transport to the private car for work trips and other journeys. While both station facilities and operating services are in need of some enhancement there is potential to secure improvements. Moreover, the site is reasonably close to local shops and other facilities. It is therefore a sustainable location.

21.4.9 There are a number of opportunities and constraints that are relevant to this site. The Council has placed considerable reliance in its January 2000 committee report and in Background Paper 2 on the possibility of creating a car park to serve the adjacent railway station. However, while this would be of benefit in improving the viability of the station and so increasing the likelihood of a better service, it neither depends on exclusion of the land from the Green Belt nor designation of the site as an ADR. PPG13 (Transport) states at Paragraph 62: "In some circumstances, park and ride schemes may be permissible in the Green Belt, where assessment shows such locations to be the most sustainable of the available options, taking account of all relevant factors. The scale and design of such schemes will be crucial factors in determining whether the impacts on the openness and visual amenity of the Green Belt are acceptable." Annex E goes on to amend PPG2, setting out detailed guidance and criteria. Moreover, a park and ride scheme does not necessarily have to be located here. There could be other acceptable sites in the locality which might include, for example, WYT15 (land off Selsdon Close) to the west of the railway line. Consequently, I attach only limited weight to this argument.

21.4.10 On the other side of the equation, the site is constrained by the flood plain of the River Cole. The Environment Agency does not object to designation of this site as an ADR but has indicated that flooding might occur over part of the site. In practice though this would have little effect given the Council's intention to maintain a green corridor along the course of the river some 15-20m wide. As regards the flooding experienced to the rear of 22, 24 and 26 Norton Lane, that particular issue could be addressed at planning application stage.

21.4.11 Another possible constraint raised by many objectors is the alleged former use of the site for the disposal of refuse which it is claimed may have contaminated the land with asbestos and/or chemicals. In response, the Council has stated that to the best of its knowledge this site has never been used for landfill or refuse tipping. I note that in advance of any development the Council would require a ground investigation to be undertaken to ascertain the position. While I consider

this to be a sensible precaution, it does not affect the principle of ADR designation.

21.4.12 Drawing together my views on this proposed ADR, I am concerned that development of WYT 14 would seriously harm the integrity of the Green Belt, leading to the merging of Grimes Hill and Tidbury Green. Damage caused to Green Belt purposes would not be outweighed by the sustainability of the site and the potential for achieving a rail park and ride facility.

21.4.13 **Issue 2:** Many objectors have expressed concern that the traffic generated by the development of WYT14 would, when taken in conjunction with other ADRs proposed both in Bromsgrove District and Solihull Metropolitan Borough, overload the inadequate road system. It is said that those local highways are already struggling to cope with recent large-scale developments at Dickens Heath Village, Blythe Valley Business Park and Wythall Green, leading to hazardous conditions for pedestrians, horseriders and cyclists, congestion for motorists and householders, and problems for emergency services. Norton Lane has been singled out. It is a major link between the A435 and Solihull carrying flows of between 1000vph and 1200vph (one way) during peak times. Having a narrow road bridge over the railway objectors say it cannot be expected to support any additional traffic.

21.4.14 I note that the Highway Authority did not object to this ADR proposal when consulted initially but expressed concern at a later stage over the impact on the existing road system. The Council for its part recognises that the present highway network is unsuitable to accommodate large-scale development and accepts that both on- and off-site works would be necessary to achieve an appropriate standard of access and to mitigate the impact of development.

21.4.15 I am satisfied that the opportunity exists at planning application stage to secure essential highway improvements through a planning obligation under S106 of the Town and Country Planning Act 1990. While the need for such works is a disadvantage, I do not believe that, by itself, it is so compelling an objection as to rule out the selection of this site as an ADR.

21.4.16 **Issue 3:** Much concern has been voiced over the inadequacy of existing infrastructure, services and facilities which, it is argued, have not kept pace with residential development in this commuter settlement. Deficiencies in Wythall are said to include policing, schools, medical services and recreation facilities. However, as the Council points out, it is the responsibility of the various service providers to monitor and manage any improvements that are required. The relatively long time-horizon associated with safeguarded land would assist in that forward planning exercise. Where the need for additional provision arises directly from the development itself, the Council could seek a contribution from the developer through a S106 planning obligation at application stage.

21.4.17 **Issue 4:** Parts of Wythall have a semi-rural character deriving from a relatively low density of development and a composite settlement form, with constituent parts separated by tracts of open countryside. There are fears that WYT14 would degrade that character taking away the village atmosphere and detracting from the quality of life of its residents.

21.4.18 Matters of density, design and layout are issues that would normally be addressed through a development brief much later in the planning process. I note that the Council has signalled its intention to prepare a planning brief for each of the ADRs, as and when it is allocated through a Review of the Local Plan. WYT14 is not a huge site. There is no reason in my view why a scheme could not be sensitively designed to reflect the character of adjoining development and protect the living conditions of existing residents.

21.4.19 As regards the effect on land and property values, this is not a material land-use planning consideration and has no place in assessing the acceptability or otherwise of potential ADRs.

21.4.20 **Issue 5:** The site contains a Special Wildlife Site (SWS) which is a local designation. BDLPPM Policy C10A seeks to minimise the effects of development on such areas. Given the Council's intention to retain an open space corridor along the River Cole, I consider that nature conservation interests would not be compromised. I note that Worcestershire Wildlife Trust, although describing the SWS as 'an invaluable wildlife corridor', has not raised any objection to this proposed ADR.

21.4.21 It is claimed by some objectors that bats have been detected on the site during the last 2 years. Bats are a protected species under the Wildlife and Countryside Act 1981 (as amended) and provision is made in European Council Directive 92/43/EEC for the conservation of natural habitats and of wild fauna and flora. However, Worcestershire Wildlife Trust has made no mention of bats in its representation. If confirmed by subsequent investigations, measures for their protection would be a material consideration at planning application stage. But the presence of bats, in itself, does not affect the principle of designating safeguarded land.

Recommendations

21.4.22 (a) That Proposed Modification AREA/MOD67 be not made.

(c) That no further modifications be made to the Plan in respect of these objections.

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21.5 Para 35.14 – Areas of Development Restraint [Proposed Modification No AREA/MOD67]

963/1380 Mr P Kelly

Key Issue

21.5.2 Whether land off Norton Lane, Grimes Hill (WYT14) should be identified in Paragraph 35.14 as 'previously developed land', as defined in PPG3 (Housing).

Inspector's Appraisal and Conclusions

21.5.3 The objector argues that the explanatory text should include information on the status and planning history of this site. While the Council would agree to a 'brownfield' description, this does not address the objector's concern about the existence of an extant planning permission and the possibility of contamination of the land.

21.5.4 It seems to me that unless these factors are so significant as to affect the principle of ADR designation, then they can be addressed as part of a development brief in the event that the land is allocated for development. Where they are not central to ADR designation, as in this case, then I conclude it is not necessary to incorporate that additional information in the Plan.

(Note: Although promoted by the Council as safeguarded land, I recommend elsewhere in my Report that this site should NOT be designated as an ADR, for Green Belt reasons.)

Recommendation

21.5.5 That no modifications be made to the Plan in respect of this objection.

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21.6 Policy WYT15 – Areas of Development Restraint [Proposed Modification No AREA/MOD68]

580/1002 The Hagley Estate
577/1246 J Tomlinson
583/1247 A J Thomas
585/1248 P M Thomas
587/1249 M L Thomas

589/1250 D Hood
591/1251 Ms T Hood
…….

(In the interests of economy only a few of the objections to this Policy are set out above. A complete list of objections is given in Appendix F)

Key Issues

21.6.1 (1) Whether the site is suitable as an ADR and should be excluded from the Green Belt.

(2) The effect of further development upon local infrastructure, services and community facilities.

(3) Whether the site is accurately described in the supporting text.

(4) The effect of the development on the character of the village, land values and the quality of life enjoyed by local residents.

Inspector's Appraisal and Conclusions

21.6.2 **Issue 1:** WYT15 comprises a site of 3.1ha on the south-east side of Wythall at Grimes Hill. It is bounded by existing residential development fronting Lea Green Lane and Selsdon Close wrapping around the southern, western and part of the northern boundaries, and by the railway line to the east. The land lies within the confirmed Green Belt. It is Grade 3b agricultural land used for grazing.

21.6.3 Looking first at Green Belt matters, I consider that this site fulfils a single Green Belt purpose of safeguarding the countryside from encroachment. However, as I have recognised on many occasions this is a function common to virtually all ADRs on the margins of settlements. The effect on the visual integrity and openness of the surrounding Green Belt would in my judgement be far less in this location than in many others because the site is of relatively modest size and is extremely well-contained by existing development and the railway line. Some objectors have argued that it also prevents neighbouring settlements from merging into one another. However, I believe the crucial gap between Grimes Hill and Tidbury Green would not be significantly eroded through the development of WYT15. The railway line is a prominent feature in this locality and forms an obvious limitation to expansion of Grimes Hill in an easterly direction. It would give a strong, defensible Green Belt boundary whilst affording a limited opportunity to 'round-off' the settlement. That was also the view of the BDLP Inspector who stated in support of this site: "…it is apparent that the site is very well contained by physical features" and has "the fewest disadvantages of those which were brought to my attention in Wythall, and I conclude that the need for some provision in Wythall…could amount to the necessary exceptional

circumstances for its consideration as an ADR." I note that the Inspector who earlier dealt with the Wythall Local Plan was of a like mind. He considered as long ago as 1988 that this site was suitable for residential development.

21.6.4 I now turn to examine the sustainability credentials of the site. The land lies within a public transport corridor as defined by the County Council. Being within the 15 minute foot and cycle isochrone of Wythall railway station, residents would have ready access to modes of travel other than the private car allowing them to take advantage of employment opportunities in the conurbation and elsewhere. Moreover, Wythall has a reasonable range of services and facilities that are accessible on foot, by cycling or by bus with some local shops along Station Road catering for everyday needs. Residential development of this site would help to sustain or expand those services. Consequently, I find this to be a sustainable location for meeting longer-term development needs.

21.6.5 As in the case of WYT14 there are other matters that must be considered and weighed in the balance. Firstly, there could be scope here for a station car park. I recognise that the Council favours land off Norton Lane for a park and ride facility and that local residents are concerned about the use of Selsdon Close and Lea Green Lane for access. Nevertheless, I believe that this site should not be ruled out without a full examination of all options. Policy WYT10 is, I note, a general policy that is non site-specific.

21.6.6 Secondly, concern has been expressed by many objectors that the local road system is unsuitable to take the additional traffic likely to be generated by residential use of this site. Of particular concern is the junction of Station Road, Norton Lane and Lea Green Lane. Further development would, they say, lead to additional road safety hazards and congestion and would obstruct access for emergency services. The Highway Authority has confirmed that it opposes large scale development and would require both on- and off-site works to ensure an appropriate standard of access and to mitigate the impact of development on the highway network. While that does not amount to a ringing endorsement of this and any other ADR in Wythall, it is not an objection in principle that would preclude selection of this site. Safeguarded land, by definition, is intended to meet development needs in the longer term. I have already concluded elsewhere in my report that it is necessary to accommodate ADR requirements to 2021. By the time WYT15 is released for development circumstances could have changed. Solutions might have been found, for example, to the problems of through traffic and rat-running which appear to be major contributors to congestion. In any event, the Council has indicated that it would seek a planning obligation under Section 106 of the Town and Country Planning Act 1990 at application stage to address any outstanding highway concerns. That could include the junction of Selsdon Close and Lea Green Lane which is claimed by some objectors to be dangerous.

21.6.7 To sum up, I find WYT15 to be a suitable ADR site. Not only is it a sustainable location convenient for public transport and served by a range of local services but development here would have a minimal impact on Green Belt functions. Moreover, I believe that highway concerns are capable of resolution and there is scope, if no better sites can be identified, for car parking to serve Wythall station.

21.6.8 **Issue 2:** Many objectors maintain that the provision of local infrastructure and community facilities, including shops, policing, medical services, schools and sewerage, has lagged behind the development of housing in Wythall. They fear that the situation would be made worse by the designation of this ADR. However, as I have previously explained, safeguarded land generally has a long lead time before it is released for development. In the intervening period service providers would be able to plan and monitor to ensure that appropriate investment is made in the right place at the right time. Any outstanding requirements directly attributable to the development could be addressed by the developer through a planning obligation made under Section 106 of the Town and Country Planning Act 1990. Bearing in mind also the fairly modest area of WYT15, I do not find this argument to be a compelling reason for objection.

21.6.9 **Issue 3:** WYT15 is described in the supporting text as 'land immediately to the north of Norton Lane'. I agree with an objector that it could be confused with WYT14. While the site does lie to the north of that road, at a distance, a more accurate description would be 'land to the west of the railway line and to the rear of development off Lea Green Lane'. Moreover, I note that the text has been given the wrong paragraph number in the BDLPPM and does not correspond with that set out in Modification Document 3. I recommend that those matters be addressed.

21.6.10 **Issue 4:** Concerns relating to the effects of development on the semi-rural character of Wythall, the quality of life of residents and property values, have all been dealt with in my consideration of objections to Policy WYT14. The same general comments apply in respect of WYT15 (see Paragraphs 21.4.17-21.4.19 of this report).

Recommendations

21.6.11 (a) That the Plan be modified in accordance with Proposed Modification AREA/MOD68, subject to the following additional modification:

Paragraph 35.14 be numbered correctly and the text altered to read:

"An area of land to the west of the railway line and to the rear of development off Lea Green Lane is designated as an ADR. This accords with the principles recommended by the Inspector holding an inquiry into the BDLP to find more land capable of meeting future development needs in the

District. This site was not, however, the subject of one of the original objections made to the Local Plan."

(b) That no further modifications be made to the Plan in respect of these objections.

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22. APPENDICES

22.1 Overview

22.2.1 Appendices 2 and 3A list, respectively, the proposed Green Belt changes and the Areas of Development Restraint.

22.2.2 I examine objections made to some ADR 'omission' sites under Appendix 3A. While I recommend against many of those sites, I find in favour of land west of Whitford Road, Bromsgrove.

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22.2 APPENDIX 2 – Green Belt Modifications [Proposed Modification No APPEND/MOD1]

1264/1382	Bryant Group
1057/1429	Westbury Homes (Holdings) Ltd
1067/1430	Persimmon Homes
1082/1432	Bovis Homes Ltd
1091/1433	Barratt West Midlands

Key Issues

22.2.1 (1) Whether the Green Belt modifications listed at Appendix 2 (and shown on the Proposals Map and Alvechurch Inset Map) should be further modified so that land at Lodge Farm, Lye Meadows, Alvechurch and land at Woodrow Lane, Catshill is excluded from the Green Belt.

(2) Whether the Green Belt modifications listed at Appendix 2 (and shown on the Proposals Map, and Bromsgrove and Wythall Inset Maps) should be further modified so that:

- BROM5 and BROM5B are retained as Green Belt;
- land west and south of BROM5D, and at Whitford Road, Bromsgrove is excluded from the Green Belt; and
- land at Shawbrook, Wythall is excluded from the Green Belt.

Inspector's Appraisal and Conclusions

22.2.2 **Issue 1:** I have addressed this matter in response to related objections. See Paragraphs 22.3.2-22.3.13 (proposed ADR - Lodge Farm, Lye Meadows, Alvechurch) and 17.2.1-17.2.13 (proposed ADR - Woodrow Lane, Catshill) of my report. I conclude in both cases that the land fulfils important Green Belt functions and that there is insufficient justification for ADR designation. Both sites should therefore remain in the Green Belt.

22.2.3 **Issue 2:** These matters have been dealt with elsewhere in my report. See Paragraphs 17.3.8-17.3.27 (BROM5), 17.5.3-17.5.15 (BROM5B), 17.8.19-17.8.23 (land west and south of BROM5D), 22.3.18-22.3.31 (land off Whitford Road, Bromsgrove), and 22.3.58-22.3.70 (land at Shawbrook, Wythall). I conclude that BROM5 and BROM5B should not be designated as ADRs but should be confirmed as Green Belt; that land west and south of BROM5D (between Fockbury Mill Lane in the north, Timberhonger Lane in the south and the M5 in the west) should be taken out of the Green Belt but not designated as an ADR; that land at Whitford Road, Bromsgrove should be designated as an ADR; and that land at Shawbrook, Wythall (except for 6ha approximately at Bleakhouse Farm) should remain as confirmed Green Belt and not be designated as an ADR.

22.2.4 The Council has recognised through Further Change 5 that Appendix 2 will need to be altered to reflect the outcome of my recommendations, should they be accepted.

Recommendations

22.2.6 (a) That the Plan be modified in accordance with Proposed Modification APPEND/MOD1, subject to the further modifications necessary to take account of the recommendations made elsewhere in this report in respect of ADR provision and changes to Green Belt boundaries.

(b) That no further modifications be made to the Plan in respect of these objections.

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22.3 APPENDIX 3A – Areas of Development Restraint

1265/1382 Bryant Group
1267/1382 Bryant Group
1033/1385 Stansgate Planning Consultants

1207/1405	Wimpey Homes Holdings Ltd
1058/1429	Westbury Homes (Holdings) Ltd
1061/1429	Westbury Homes (Holdings) Ltd
1062/1430	Persimmon Homes
1083/1432	Bovis Homes Ltd
1084/1432	Bovis Homes Ltd
1092/1433	Barratt West Midlands
1093/1433	Barratt West Midlands
1282/1455	Mason Richards Planning
1505/1455-FC	Mason Richards Planning

Key Issues

22.3.1 (1) Whether land at Lodge Farm, Lye Meadows, Alvechurch should be designated as an ADR and excluded from the Green Belt.

(2) Whether land at Woodrow Lane, Catshill should be designated as an ADR and excluded from the Green Belt.

(3) Whether the omission of Appendix 3A from the Schedule of Proposed Modifications has been satisfactorily addressed.

(4) Whether individual site details contained in Appendix 3A should be amended to include both gross areas and net developable areas.

(5) Whether land off Whitford Road, Bromsgrove should be designated as an ADR and excluded from the Green Belt.

(6) Whether land at Dale Close, Catshill should be designated as an ADR and excluded from the Green Belt.

(7) Whether land west of Brockhill, Redditch should be designated as an ADR and excluded from the Green Belt.

(8) Whether land at Shawbrook, Wythall should be designated as an ADR and excluded from the Green Belt.

(9) Whether land at Alcester Road, Lickey End should be designated as an ADR and excluded from the Green Belt.

(10) Whether Proposed Modification ENV/MOD3 has been properly dealt with in the Schedule of Proposed Modifications, Document 3.

Inspector's Appraisal and Conclusions

22.3.2 **Issue 1:** *(Lodge Farm, Lye Meadows, Alvechurch)* The Bryant Group propose that an ADR 'omission' site be designated at Lodge Farm, Lye Meadows, on the south-east side of Alvechurch close to the historic core of the settlement. The plan accompanying the objection shows 'Site B' to have an area of 14.6ha. However, the detailed statements elaborating the objectors' case indicate a more extensive site of 22.67ha. For the purposes of dealing with these objections I have taken the larger site as being the objectors' latest proposals. That land is bounded by residential properties and a day nursery fronting Swan Street/Redditch Road to the west, a sewage treatment works to the south, the River Arrow and the A441 to the east, and Mill Farm and the site of the Bishop's Palace (a Scheduled Ancient Monument) to the north. It comprises gently undulating Grade 3 agricultural land sloping down to the River Arrow used for a mixture of rough grazing and arable farming. At its northern end the site contains extensive medieval earthworks. It lies within an area confirmed as Green Belt and was recommended for consideration as an ADR by the BDLP Inspector. The objectors seek designation of the whole of the objection site as safeguarded land and its exclusion from the Green Belt. However, to minimise visual intrusion in the landscape and to protect the setting of the Scheduled Ancient Monument (SAM), they say that the portion of the site most suitable for development would be south of the bridleway/track leading to Lodge Farm.

22.3.3 Before examining site-specific matters I need to briefly address some broader issues. An important part of the objectors' case is that the Council has identified insufficient safeguarded land in total and adopted an inadequate timeframe for ADR provision. This would, it is said, fail to give the degree of permanence to Green Belt boundaries required by PPG2 so that they will endure well beyond the Plan period. While being targeted for some longer-term development, it is claimed that the potential of Alvechurch to accommodate indigenous growth and some of the needs of the conurbation in a sustainable fashion, has not been adequately exploited by the Council. The objectors maintain that Alvechuch has scope for a greater level of safeguarded land, relative to other secondary settlements. Based on its population and potential role in the District they suggest that a further 13.6ha of ADR land will be required by 2026.

22.3.4 These matters have been covered earlier in my report. The conclusions I reached, following the debate at the Round Table Session at which the Bryant Group was represented, was that sufficient ADR provision should be made to last until 2021. Given the updated housing figures available and the evidence of windfalls and brownfield sites continuing to come forward, I consider that the 140ha or so of safeguarded land identified by the Council through the BDLPPM would prove adequate to meet that need.

22.3.5 Furthermore, I support in very general terms the overall distribution of ADR land between secondary settlements that is promoted by the Council. This is based

loosely on size and suitability to accommodate growth. The relatively small (2.4ha) brownfield site at Alvechurch Brickworks that I have found to be an appropriate addition would bring Alvechurch's ADR total more into line with its population - depending upon whether the parish or settlement boundary is used. This is in contrast to the objection site which would, in terms of area, represent a significant proportion of the Council's total District-wide ADR provision.

22.3.6 Turning now to look at the merits of the objection site, it seems to me that it fulfils 2 out of the 5 Green Belt purposes identified in Paragraph 1.5 of PPG2. Firstly, it assists in safeguarding the countryside from encroachment. While virtually all greenfield ADRs involve some measure of encroachment, this land has a particular disadvantage in extending the built-up area south-eastwards away from the compact heart of the settlement into what I consider to be a relatively prominent and visible location. That visibility is demonstrated by the photographs forming part of the Landscape Appraisal at Appendix C of the objectors' evidence - particularly photos 2, 3 and 4 taken from public bridleway No 50 and public footpath No 52 within the Landscape Protection Area to the east of the by-pass. It would be exacerbated by the objectors' declared intention of keeping land north of the bridleway open, thereby divorcing the developable parts of the site from the village proper and consolidating the pattern of ribbon development. While the BDLP Inspector felt that the River Arrow and the by-pass would restrict further incremental encroachment into open countryside to the east, the impact of a major loss of Green Belt land would I feel be significant.

22.3.7 Another Green Belt purpose is to preserve the setting and special character of historic towns. Alvechurch falls into that category with its central core designated as a Conservation Area and containing the listed building of St Lawrence's Church. Moreover, there is the Scheduled Ancient Monument (SAM) of the Bishop's Palace situated immediately to the north, with the associated medieval earthworks (moated areas, fishponds and ridge and furrow fields etc) taking up a significant proportion of the objection site. I have no doubt that even with the retention of a buffer of open land, substantial development over the southern section of the site would adversely impact upon the settings of both the Conservation Area and the SAM. These are defined by views across and within the objection site. In this regard, I note that part of the land intended for development is identified on the objectors' Plan CPM3 as an 'area of higher visibility'. I do not accept the objectors' argument that providing greater public access would necessarily represent a planning gain. Allowing residents of Alvechurch to better appreciate the SAM and the Special Wildlife Site along the River Arrow carries with it the risk of abuse and damage to these sensitive sites.

22.3.8 While I find that harm would be caused to those Green Belt purposes, I am satisfied that there would be no sprawl of large built-up areas and no implications for urban regeneration. As regards the merging of settlements, I agree with the BDLP Inspector that designation of the objection site as an ADR would neither

create nor increase any sense of coalescence. Redditch to the south-east and the closest settlement of Rowney Green to the east, are both sufficiently far away.

22.3.9 Looking now at the site's sustainability credentials, the commercial heart of Alvechurch is situated off-centre, close to the eastern edge of the settlement. This means that the developable area of the objection site is just 375m or so from the Bear Hill/Swan Street junction - and therefore within easy walking distance of a range of local services and facilities. And it is about 700m from the railway station, on the main bus corridor. This represents a sustainable location that in some respects is superior to the ADRs designated by the Council.

22.3.10 As regards site constraints, a combination of the SAM itself, the proposed open buffer areas to the SAM and the Conservation Area, the corridor of the River Arrow, the close proximity of the by-pass, and the elevation and relatively high visibility of sections of the site would together severely restrict the net developable area. This is confirmed by the information and proposals presented on Plans CPM3 (Constraints and Opportunities to Development), CPM4 (Concept Zone Diagram) and CPM5 (Concept Masterplan) that form part of Appendix C to the objectors' evidence. While allowance has been made in the ADR calculations for the likelihood that parts of some ADRs will not in practice be developable, the constraints here are very significant indeed. Out of a total site area of 22.6ha, only 4.3ha is proposed to be developed for housing - equivalent to just 19% of the site area. Removal of the whole site from the Green Belt and its designation as an ADR would clearly not provide an efficient use of land. This would be contrary to the advice given in Paragraph 57 of PPG3.

22.3.11 The objectors are critical of the Council's ADR evaluation matrix. It is argued that the methodology does not identify the best sites, contains scoring inaccuracies, adopts inappropriate criteria, and accords unreasonable weight to certain natural and built environment indicators. By applying a revised methodology to sites in Alvechurch the objectors show that Lye Meadows scores a close second to ALVE6 (Land adjacent to Crown Meadow).

22.3.12 A great deal of criticism has been levelled by many objectors against the Council's site selection matrix. I share many of those concerns and consequently give the resultant scores little weight. I accept the Council's explanation that it was not meant to be a definitive exercise but was applied as a first sift only. That is borne out by the Council's choice of some sites as ADRs which in terms of the matrix scores are inferior to other land that has not been selected. Rather than relying on such dubious quantitative methods where output depends upon the parameters and weightings used, I prefer to exercise my own subjective judgement.

22.3.13 In this case, I believe that the Green Belt functions performed by the objection site are of paramount importance. Designation of this land as an ADR would cause serious encroachment into the surrounding open countryside and would

harm the settings of the Conservation Area, the SAM and the village itself. The presence of so many site constraints would also result in a low housing yield and an inefficient use of land. The sustainability of the site together with the opportunity to create an open parkland with scope for environmental interpretative enhancement of the SAM would not outweigh those disadvantages. I conclude that this would not be an appropriate ADR site. Moreover, there is no overriding need to find additional safeguarded land in Alvechurch beyond the quantum identified by the Council in the BDLPPM.

22.3.14 **Issue 2:** This issue is dealt with at Section 17.2 of the report along with other related objections. I find against the proposal primarily on Green Belt grounds.

22.3.15 **Issue 3:** Appendix 3A appears in the June 2000 version of the Plan but, because of an error, has not been included in the Schedule of Proposed Modifications, Document 3. The matter was reported to a Special Meeting of the Policy and Resources Committee on 1 March 2001 when it was resolved to make Further Change 6/Correction 12 to address the problem.

22.3.16 I do not believe it does so for 2 reasons. Firstly, it is claimed by the Council that it corrects a referencing fault. However, I do not see where Appendix 3A has been inadvertently referred to as Appendix 3 (Village Envelopes). Consequently, I see no need for Proposed Modification APPEND/MOD11. Secondly, it fails to deal with the substance of the objections - namely, that there is no modification to formally introduce Appendix 3A. I agree with the objectors that the Council should, even at this late stage, include Appendix 3A in the Schedule of Proposed Modifications.

22.3.17 **Issue 4:** The question of whether ADRs should be listed according to gross and/or net developable areas was discussed at the RTS. I deal with this matter at Paragraphs 1.2.43-1.2.45 of my report. The conclusion shared by most participants, including myself, was that it would be inappropriate at this stage to attempt a forecast of site capacity when there are so many variables including land use, constraints and policy. It is a matter for detailed consideration in a Review of the Local Plan, as and when sites are allocated for development. Consequently, it is my view that gross site areas only should be given.

22.3.18 **Issue 5:** *(Whitford Road, Bromsgrove)* An ADR 'omission' site of approximately 26ha is proposed by Barratt West Midlands Ltd and Westbury Homes (Holdings) Ltd off Whitford Road, Bromsgrove. The land is bounded by Timberhonger Lane to the north, Whitford Road to the east, the M5 motorway and the ridge of Breakback Hill to the west, and existing residential development at Hill Top to the south. It lies within interim Green Belt and comprises a mixture of Grades 2, 3a and 3b agricultural land, with approximately half classifed as 'best and most versatile'. The land consists of open fields predominantly used for pasture. It is not subject to any landscape designation.

22.3.19 Looking first at Green Belt matters, the main purpose served by this site is to assist in safeguarding the countryside from encroachment. However, as recognised on many occasions before, this is a function common to most if not all ADRs. In this instance, there is a high degree of visual containment in the landscape. Topographically, the site consists of part of a semi-circular bowl enclosed by rising ground. To the north and south, the edges of that bowl are formed by prominent development that has taken place at the Hanover International Hotel and Hill Top residential estate respectively. Both of those developments have breached the skyline. And to the west, the embanked and landscaped M5 and Breakback Hill curtail views of countryside beyond, limiting the potential impact of development on the openness of the Green Belt. In this section of the town, the M5 is a most obvious physical feature. It marks the demarcation between interim and confirmed Green Belt and is, clearly, a long-term defensible Green Belt boundary.

22.3.20 Crucially, the site lies on Bromsgrove's east-west axis which was accepted by the Secretary of State when approving the HWCSP First Alteration in June 1990 as the most appropriate direction for growth of the town. Here there are no vital gaps that must be maintained to prevent neighbouring settlements from merging with one another. And because of the presence of the M5 motorway, there is little risk that further incremental, westwards expansion would take place leading to urban sprawl.

22.3.21 As regards sustainability, there is agreement between the Council and the objectors that this is a sustainable location for further development. The site lies adjacent to the main urban area of the District within the 5 minute car and 15 minute cycling isochrones of Bromsgrove railway station. It is therefore situated in a County Council defined transport corridor. It is also on a local bus route and within walking distance of a variety of local services. The more extensive facilities of Bromsgrove town centre are available at the eastern end of Sanders Park - a distance of just 1km or so from the centre of the site. Furthermore, the objectors consider there to be potential for some mixed use development in this location that could include a local centre.

22.3.22 The Council's main objection to this proposed ADR relates to its topography and landscape impact. It is argued that the open nature of the land is important to the setting of Sanders Park. This is the town's principal area of open space containing both formal and informal recreation areas. The objection site is regarded by the Council as an important 'end-stop' to views westwards from the Park. ADR designation would, it is said, lead to that land being surrounded on all sides by built development. Support for this position is claimed from the BDLP Inpector who accepted that the site's landscape impact was a distinct disadvantage of the site.

22.3.23 Like the objectors, I am anxious that the previous Inspector's views should be fully and accurately reported and not taken out of context. What the Inspector

said at Paragraph 16.42 of his report was: "I have given close consideration to the council's arguments about the 'landscape impact' of housing on the site. I quite agree that the topography is such that houses would be visible from Whitford Road and the existing housing estates in the vicinity. Whilst this is a distinct disadvantage of the site, it is not an overriding one in the light of the need for land. My clear conclusion is that Site A should be considered as a possible ADR." In expressing that opinion he reflected earlier work undertaken by Hereford and Worcester County Council. As long ago as 1982 land west of Whitford Road was identified in a draft report entitled 'Green Belt Local Plan: Matters Proposed to be Included in the Plan' as one of only two potential ADRs adjacent to Bromsgrove town. While that Plan was not taken forward, I note that the other site at The Oakalls has since been allocated and developed for housing.

22.3.24 I do not share the concerns of the Council. It seems to me that the heavily planted M5 motorway embankment and the wooded/hedged ridge formed by the curved line of Breakback Hill are the most dominant landscape and topographic features in the locality. It is they that form the backstop to views from Sanders Park rather than the lower slopes of the objection site. Those views are, in any event, changing as tree and shrub planting within the Park matures and urban influences become more apparent. I note that this argument was not advanced by the Council at the previous inquiry.

22.3.25 I am satisfied that designation of this site as an ADR would not preclude an enlargement of Sanders Park. Such an extension would logically follow the shallow valley of the Battlefield Brook. Beyond Whitford Road the alignment of that brookcourse changes from east/west to south-east/north-west to skirt the objection site, running north of and parallel to Timberhonger Lane. Consequently, while a small part of the objection site might, with some benefit, be designated as open space to ensure greater visual continuity with the Park, the bulk would be made up of land further to the north - land that I have already concluded elsewhere in my report should be excluded from the Green Belt and designated as strategic open space.

22.3.26 I consider, as did the BDLP Inspector, that while the landscape impact is of local significance it is not a compelling objection in the context of the need to find suitable ADR sites in Bromsgrove town. That need might not be as great as envisaged by the previous Inspector but it is still significant. Safeguarded land here would not prejudice the maintenance of an attractive and functional 'green lung' reaching into the heart of the town. On the contrary, I believe it would have the advantage of encouraging walking and cycling to the town centre and would be likely to lead to an expansion of recreation facilities.

22.3.27 The Council's ADR comparative matrix attributes a score of 51.5 to Area 3A which incorporates the objection site. This compares somewhat unfavourably with other potential sites - such as BROM5 (Barnsley Hall South), for example, which scores 32.5. I have, however, already expressed serious reservations about

the value and robustness of that exercise. The inclusion of less suitable land between Kidderminster Road and Timberhonger Lane within Area 3A distorts the results. Moreover, scores for sprawl, agricultural land quality, aquifer and county archaeological records have been shown to be either inappropriate or inaccurate. And on the other side of the scales, the values attaching to some favoured sites are clearly under-scored.

22.3.28 Another area in which the Council finds this land to be lacking is in respect of its potential development yield. The need to ensure that buildings are kept away from the higher and more exposed parts of the site would, it is argued, restrict the net developable area. While this might be so, it is my experience that virtually all sites have constraints of one sort or another. The use of gross site areas makes specific allowance for the fact that not all parts of all ADRs will be capable of development. I can discern nothing unusual here which would lead me to conclude that this site would be significantly less productive than other safeguarded land.

22.3.29 Drawing together my findings in respect of this site, I believe that on both Green Belt and sustainability grounds there is much to commend it as a potential ADR. It lies on the town's favoured east-west axis. Encroachment into the surrounding countryside is limited by the M5 motorway and the topography. Together these provide a significant degree of visual containment. The site is well-related to the town centre, linked by a park that could be further extended along the tree-lined Battlefield Brook to provide additional recreation facilities and further opportunities for walking and cycling.

22.3.30 Moreover, much of the land is, in the context of Bromsgrove town, of a lower agricultural land quality than competing sites. Noise from traffic using the M5 motorway has not been identified as a serious constraint. Views of the site are mainly of a local nature, with levels of screening having increased since the time of the last inquiry. While the Highway Authority would require some off-site highway improvement works, I note that there is no objection in principle to its selection as an ADR.

22.3.31 I conclude that this is an appropriate ADR site that should be taken out of the Green Belt. I recommend accordingly.

22.3.32 **Issue 6:** *(Dale Close, Catshill)* An ADR 'omission' site of 2.9ha is proposed at Dale Close on the south-west margins of Catshill. This parcel of land is roughly rectangular in shape and consists of a grid of 4 fields currently used for grazing. It contains a large cattle shed. The site falls in elevation from north-west to south-east towards the M42 motorway. It has substantial hedgerows with mature trees along most of its boundaries. The land is surrounded on 3 sides by a road known as Hinton Fields which is very narrow over much of its length. Leading off Stourbridge Road that country lane serves a number of residential properties, some of which are set in large curtilages. The north-eastern boundary

of the site is formed by Rocky Lane. This is a narrow sunken highway with a steep gradient that rises from its junction with Stourbridge Road to cross the M5 motorway further to the west. Access to the objection site is obtained from the end of a short suburban-style cul-de-sac known as Dale Close that abuts the site on its south-eastern side. The land comprises an area of interim Green Belt.

22.3.33 This site was examined by the BDLP Inspector who recommended that it be considered as a possible ADR - subject to the findings of the Council's comprehensive review of safeguarded land and a decision about whether, in principle, there should be ADRs at Catshill. He supported the notion that the future growth of Bromsgrove town should generally be on an east-west axis given the relative importance of the Green Belt gap between Bromsgrove and the satellite settlements of Catshill and Lickey End. But he found, nevertheless, that: "It is to the west of the Stourbridge Road just outside what I regard as the key, central section of the gap."

22.3.34 That is not, however, the way I view the situation. I consider this site fulfils two Green Belt purposes - notwithstanding the concessions made by the Council at the inquiry in respect of coalescence/separation. Like most potential ADRs it assists in safeguarding the countryside from encroachment. But I also believe it helps prevent neighbouring towns from merging with one another. While the site lies to the west of the B4091 and has a ribbon of residential development around it both at Dale Close and along Hinton Fields, I have no doubt that functionally it forms a vital, integral part of the narrow Green Belt gap separating Catshill from Bromsgrove. I find myself in agreement with an earlier Inspector who in 1993 held an inquiry into 2 planning appeals on this site (ref: T/APP/P1805/A/93/225961 and 228484). In dismissing those appeals for residential development the Inspector said: "I acknowledge the site is largely surrounded by roads and residential curtilages and that the land to the north has permission for residential development. However, the housing to the south and west of the site is generally more scattered and rural in character and falls within the Green Belt. In my view, therefore, the site is clearly linked with the wider Green Belt. I consider development on this site would reduce still further the narrow gap remaining between Bromsgrove and Catshill."

22.3.35 The objector has referred to development currently taking place in an elevated location immediately to the north of the site on the opposite side of Rocky Lane. The Council says that residential development was approved there as long ago as 1982, with the latest permission for 28 dwellings dating from 1996. There is though a ridge of land separating the 2 sites which roughly follows the alignment of Rocky Lane. Together with established hedgerows and mature trees, that physical feature serves to distinguish and separate those adjacent areas from each other. The significance of this is that whereas the Rocky Lane development looks inwards and downwards to Catshill, the objection site is far more prominent, facing outwards towards Bromsgrove.

22.3.36 The Inspector holding the S78 inquiry in 1993 remarked: "…I saw that from Stourbridge Road the site is partly screened by the houses along Hinton Fields. I accept, therefore, the development would not be unduly intrusive within the immediate area. However, the site is far more prominent, in my view, from the M42 and the northern slip road to the M5, because of the rising nature of the land. From this viewpoint the hedgerow on Rocky Lane appears to act as a visual buffer to the more built-up area of Catshill to the north. Consequently, I find the development of the larger site would be visually intrusive. I do not consider the siting of single storey dwellings on the higher parts of the site would significantly reduce the impact." Having carefully inspected the land, I am of a similar view. Even if development was kept clear of the north-western section, sensitively laid out and strategically landscaped I believe it would be clearly visible from within and across the valley to the south-east. It follows that I do not accept the BDLP Inspector's conclusion regarding the potential for mitigation.

22.3.37 Turning now to questions of sustainability, land at Dale Close is situated approximately 4.1km from Bromsgrove railway station. It straddles the 5 minute car and 15 minute foot and cycle isochrones defined in the County Council's 1997 Transport Corridors Study. Given that such isochrones are intended to be applied in a flexible manner and used as guidelines I believe this site broadly meets that accessibility criterion. Moreover, the Council accepts that bus corridors are relevant in determining the location of ADR sites. In this case, Stourbridge Road has regular and frequent bus services to both Bromsgrove and Birmingham. Consequently, while this land might not be the most accessible site offering the best interchange with rail services, it does provide more than one public transport option to discourage car use. Moreover, there is a range of local services and facilities available within walking distance in Catshill to meet everyday needs. I conclude on this point that the objection site is in a reasonably sustainable location.

22.3.38 There are also other matters that need to be considered. Firstly, the site comprises mostly Grade 2 agricultural land, with some Grade 3a. Although this is 'best and most versatile' farming land it is of a slightly lower grade than some of the ADR sites promoted by the Council around Bromsgrove town. It is not therefore a factor that I believe should weigh heavily against this site.

22.3.39 Secondly, the Council omitted to include land at Dale Close in its published ADR matrix. This has made comparisons with other potential ADR sites very difficult. While that information was subsequently provided at the inquiry, the grouping of some sites and not others detracts from its usefulness. When taken alongside the many omissions, errors and inconsistencies which I have already referred to elsewhere in my report, I do not consider the matrix to be robust. Its value as a decision making tool is therefore limited and I afford it little weight in assessing the potential of this site.

22.3.40 Thirdly, much has been made by the objector of the admission at the previous inquiry that this was 'a reasonably acceptable site'. However, I accept the explanation proffered by the Council that this was a reference to there being no site specific constraints that would preclude or inhibit development. Since that time planning circumstances have changed significantly, with very different strategic requirements emerging through the WCSP.

22.3.41 Finally, I recognise that land at Dale Close would provide little opportunity to accommodate mixed use development, unlike some of the much larger BROM designations. However, it would contribute to a portfolio of ADR sites of different size and character. That benefit would I feel even out any disadvantage.

22.3.42 To sum up, I am satisfied that land at Dale Close is in a reasonably sustainable location. Moreover, its agricultural land quality is not so exceptional as to preclude it from consideration as an ADR. However, the site does perform valuable Green Belt functions. It serves to maintain the integrity of the narrow and still largely undeveloped gap between Bromsgrove and Catshill. Further development here would not only encroach into the countryside extending urban influences along the southern edge of Catshill, but would be visually intrusive in longer-distance views. Given the need for less safeguarded land than originally envisaged by the BDLP Inspector and the availability of better sites elsewhere, I see no compelling reason to identify this site as an ADR.

22.3.43 **Issue 7:** *(Land west of Brockhill, Redditch)* A 15ha ADR is sought by Persimmon Homes on the north-west margins of Redditch town within the area administered by Bromsgrove District Council. Described as land west of Brockhill, the site adjoins recent housing development in Redditch and further land allocated for residential purposes in the Redditch Borough Local Plan No 2, adopted in 1996. Together, these areas will accommodate a total of 1300 dwellings. The land lies within the Batchley Brook Valley. It abuts Brockhill Wood to the north which is designated in the BDLPPM as a Landscape Protection Area, while to the west it is defined by field boundaries. A post and wire fence is, in the main, all that separates the objection site from the Brockhill development. The land lies within an area of interim Green Belt and is predominantly Grade 3b agricultural land. In 1992 planning permission was granted for public open space, landscaping and woodland planting over the eastern part of the site in association with residential development of adjoining land in Redditch Borough. That permission has not been implemented. The Brockhill West 'omission' site was not one that was previously considered by the BDLP Inspector.

22.3.44 Before examining the merits of this site it is necessary to consider the broader principle of making provision for the long-term development needs of Redditch within Bromsgrove District. I have concluded much earlier in my report that the total quantity of ADR land identified by the Council will be sufficient to meet the District's requirements to about 2021. This will give the certainty to Green Belt boundaries envisaged by PPG2 and satisfy the strategic demands of WCSP

Policies D.40 and D.41. Such provision has been made almost exclusively to cater for the needs of Bromsgrove District. The exception is an employment-related ADR at Ravensbank that has been dealt with separately and which I have addressed earlier in my report. The Council argues that if Redditch is experiencing difficulties in accommodating longer-term growth within its own boundaries, a properly devised strategy is essential rather than piecemeal incursions into the areas of neighbouring authorities such as is currently proposed by the objector.

22.3.45 This point was addressed at the WCSP EiP. The Panel considered that Redditch should accommodate its own natural growth to 2011, having 3 ADRs capable of helping meet those requirements. It said: "We agree with WCC and BDC that there is no clear strategic basis for Redditch's needs to be met in Bromsgrove district for the plan period." As regards the position post-2011, it was accepted that Redditch might have some difficulty. The Panel concluded that: "Long term needs beyond 2011 can be assessed in the context of RPG review and a study of potential areas for expansion can be undertaken in the light of that review so that the structure plan can give steer on where growth should take place." It was made clear that sites beyond administrative boundaries should be considered, the Panel indicating: "Neither do we see administrative boundaries as a constraint. The sequential approach should apply as much to Redditch as elsewhere. In this regard the employment ADR at Ravensbank should not be considered any differently than the Enfield ADR as a potential location and, if it were required, the housing site in Bromsgrove favoured by MR should be considered in strategic terms as if it were in Redditch."

22.3.46 As regards the question of migrant growth, the objector considers that Redditch is a logical location for expansion. It is a former New Town, has the benefits of investment in physical and social infrastructure, and is within the Central Crescent with close social, economic and community links with the conurbation to which it is connected by rail. The site at Brockhill is, moreover, on the conurbation side of the town. However, the EiP Panel would not be drawn on the matter, commenting: "Whilst we take the view that Redditch should provide for its own natural increase, that is a separate and very different argument from that put forward that the borough should also make provision for those moving into Worcestershire. We do not propose to comment on whether the land put forward by MR is or is not the best location for growth; the debate as to where expansion should go would best follow the RPG review." This position was reinforced by the Panel's overall conclusion. In recommending an increase in Redditch's housing allocation to 4550 dwellings (to meet natural increase), the Panel stated "…we are concerned that the matter of Redditch's long term needs must be addressed in a proactive way and urge that it should form part of the input into the RPG review process so that the strategic steer sought by the Borough and the adjoining districts is provided." I would expect Redditch Borough Council to play a lead role in that activity.

22.3.47 I concur with the position taken by the WCSP EiP Panel and BDC. It would, I feel, be wrong to identify an ADR on the basis of a single site being put forward when other potential sites have not been examined. At the very least it would be premature given the absence of any involvement by Redditch Borough Council or Worcestershire County Council in that process, neither of which has identified an urgent requirement to find additional safeguarded land. If future planning guidance dictates that this or any other land beyond Redditch's administrative boundaries should be used for long-term development, I believe this would be likely to constitute the 'exceptional circumstances' required by PPG2 to warrant an adjustment of Green Belt boundaries.

22.3.48 Redditch town centre is offset to the north-west of the urban area. This means that the objection site is situated relatively close to the town's main amenities. But any advantage in this regard must be weighed against its location in the gap between Redditch and Birmingham/Bromsgrove which is intrinsically a more sensitive area than the Green Belt to the south of the town. And being a former New Town, Redditch has very good public transport services generally and a modern road network. These ensure that outlying sectors also have ready access to neighbourhood facilities and the town centre and are similarly sustainable locations for growth.

22.3.49 A number of other points have been advanced on behalf of the objector in support of this site. Firstly, the question is asked as to why, if the Council is opposed in principle to meeting Redditch's long-term housing needs as part of the current Local Plan exercise, did it include potential ADR sites on the periphery of Redditch in its comparative study. The Council has responded that it did so to cover all possibilities. Once it was established through the EiP Panel's report that there was no strategic requirement, then those sites were pursued no further. I find that explanation credible. In any event, the matrix scores have been extensively criticised on account of errors, omissions and inconsistencies, and I have afforded them little weight in my assessment of individual sites.

22.3.50 Secondly, I see no special significance in the District Council having granted planning permission in 1992 for public open space, landscaping and woodland over part of the objection site. Those uses are compatible with Green Belt designation and were, I am told, put forward to support residential development at Brockhill.

22.3.51 Thirdly, I do not believe that the 10.3ha employment-related ADR for Redditch at Ravensbank bears direct comparison with the objector's proposal. I note that Ravensbank was originally granted planning permission on appeal in 1992 although take-up was so slow that by October 2000 approximately half still remained undeveloped. The WCSP exploits that remaining provision, with the current employment area contributing towards meeting Redditch's needs until at least 2011. Beyond that date the Council is proposing a modest ADR to extend the long-term potential of the site. This reflects the strategic cross-border nature

of the allocation justified through the structure planning process. Moreover, it has been supported by a joint study between neighbouring authorities. This is in contrast to the proposed housing ADR site at Brockhill where none of those conditions apply. Most importantly, there has been no study carried out of the likely housing needs of Redditch after 2011. Such a study should take account of future regional planning guidance, should involve participants from all neighbouring local planning authorities including the County Council, and should provide for a thorough examination of alternatives.

22.3.52 I conclude therefore that there is no compelling argument for including the objection site as an ADR in this Plan. However, in view of the evidence presented to the inquiry on site-specific matters I propose to offer some brief comments on Green Belt, landscape, sustainability and others matters that might be relevant in any future consideration of the land.

22.3.53 Looking first at Green Belt functions, this site assists in safeguarding the countryside from encroachment. However, as I have said on many previous occasions, encroachment is common to virtually all potential ADRs which are typically on the margins of urban areas and mostly in Green Belt locations. In this case there is a fair degree of topographical containment, limited visibility from public vantage points and a relatively low landscape sensitivity to accommodating development - as confirmed by the objector's environmental appraisal. The site lies within and on the lower slopes of the Batchley Brook Valley, away from the A448 Bromsgrove Highway, and is largely screened from a northerly direction by Brockhill Wood. To the east, existing housing development at Brockhill has a very raw urban edge with dwellings directly adjoining farmland and little if any structural landscaping. Future development of the land would provide an opportunity to tone down that jarring interface between town and country. To the south-east, towards Redditch, further housing development is in progress. The westerly boundary of the site is formed by field boundaries. These are not particularly strong physical features of the type recognised in Paragraph 2.9 of PPG2 as being most suitable for use as long-term Green Belt boundaries. However, they could be reinforced by judicious tree/woodland planting, as could the more elevated south-western and north-western extremities of the site.

22.3.54 The other Green Belt purposes of relevance here are sprawl and coalescence. In my view neither would be serious concerns given the limited size of the site, its location on generally lower ground within a valley and the nature of surrounding land uses to the north, east and south. Moreover, I consider that little if any precedent would be set whereby pressure would be applied for the release of adjoining land. And Bromsgrove is sufficiently distant from the closest part of Redditch to avoid any immediate perception of the merging of settlements. I consider overall that an expansion of existing development at Brockhill Drive would have a relatively modest impact on the broader countryside - should a need eventually be established for an ADR in this general location.

22.3.55 Turning to matters of sustainability, Brockhill West is a convenient location on the edge of Redditch adjoining existing housing development where use could readily be made of existing infrastructure. It is within the 5 minute drive isochrone of Redditch railway station, and within 2km of both the bus station and the town centre with its wide range of higher order facilities and services. It is already served by buses - a local hail and ride circular service and the Redditch to Merry Hill Regional Shopping Centre service. The Redditch Joint Study (Interim Report, December 1986; and Final Report March 1988), the adopted Redditch Borough Local Plan No 2 (1996), and the WCSP EiP Panel Report (October 2000) have all identified the Brockhill/Enfield area as a generally sustainable location for housing growth. I concur with those assessments.

22.3.56 As regards constraints and opportunities, the site lies outside the Landscape Protection Area embracing Brockhill Wood and well clear of the Hewell Grange SSSI further to the north-west. There are no Special Wildlife Sites, Tree Preservation Orders, archaeological remains or other designations that apply to the site. The land is Grade 3b agricultural land quality which is some of the poorest in a District renowned for its high quality farming land. Access to the land is readily available via the Brockhill Drive district distributor. The Batchley Brook provides potential for an open space corridor linking towards the town centre through the adjoining Brockhill development and Batchley.

22.3.57 To sum up, I believe there is insufficient justification at this time for designation of the objection site as an ADR. The future needs of Redditch should be addressed through a comparative study involving all key parties, undertaken in the context of a review of regional planning guidance. In the event that a need is eventually established, I believe that the Green Belt functions performed by this site are not so crucial as to rule it out of contention. Moreover, this is a sustainable location that is largely unconstrained by landscape, agricultural land quality or other considerations.

22.3.58 **Issue 8:** *(Shawbrook, Wythall)* Bovis Homes Ltd and Barrett West Midlands Ltd propose that a 84ha 'omission' site at Shawbrook, Wythall should be designated as an ADR in place of WYT14. The land is bounded by Alcester Road to the west, Houndsfield Lane to the north, Lea Green Lane to the east, the rear of properties off Three Oaks Road and Station Road to the south-east and Gorsey Lane to the south-west. It forms a shallow valley through which the Shawbrook flows from south-west to north-east, separating Drakes Cross from the Grimes Hill parts of Wythall. The site is in agricultural use (mostly Grade 4), with fields divided by well-defined hedgerows, trees and blocks of woodland. There are a number of public footpaths crossing the land, including the North Worcestershire Path, as well as a high voltage overhead electricity power line. The land lies within an area confirmed as Green Belt by the Wythall Local Plan, adopted in 1989. I note that an ADR identified in that earlier Plan located north of Houndsfield Lane has subsequently been developed following a successful planning appeal.

22.3.59 The objectors consider that there should be a greater concentration of safeguarded land at Wythall bearing in mind its size, which is second only to Bromsgrove town, its proximity to both Birmingham and Redditch, its location in a bus and rail corridor, and a general lack of constraints that would inhibit development. The Shawbrook site is thought to have particular potential for creating a town/village centre. It would, it is claimed, unite disparate parts of the settlement (Hollywood, Drakes Cross, Trueman's Heath, Grimes Hill and Wythall Heath) which have relatively few facilities and comprise mostly residential estates occupied by commuters travelling to and from the conurbation for work. It is argued that circumstances have changed substantially since the BDLP Inspector recommended against a similar proposal in January 1997.

22.3.60 Taking these points in turn, I am satisfied that the Council has identified sufficient ADR land in total to meet strategic targets and to give Green Belt boundaries a permanency well beyond the current Plan period. Bromsgrove town is the main urban area of the District and is clearly the most sustainable settlement to which the bulk of future growth should be directed. However, the WCSP EiP Panel acknowledged that there are a number of other locations in the District that have the potential to accommodate longer-term development. Wythall is one of those sustainable secondary settlements. It is close to the conurbation such that commuting distances would be kept to a minimum; possesses public transport infrastructure, both road and rail; and offers some local services as well as limited employment. In recognition of this, I have concluded earlier in my report that WYT 15 should be confirmed as an ADR and that land at Bleakhouse Farm, which forms a small section of the much larger Shawbrook site, should be substituted for WYT14.

22.3.61 However, I see no need to designate a significantly greater quantity of ADR land at Wythall than is currently proposed by the Council. Wythall has not been uniquely identified as a corridor settlement where growth should be targeted, either in the previous HWCSP or the current WCSP, and there is no clearly defined strategic link with Redditch. Of the District's other secondary settlements there are some, like Hagley, that I consider to have a better developed urban structure more suited to expansion on a slightly larger scale. Designation of the whole of the Shawbrook site would lead to a fundamental change in the distribution of safeguarded land across the District, putting Wythall on a par with Bromsgrove town, which I find unwarranted.

22.3.62 Looking at the merits of the objection site, I agree with the previous Inspector that even though Wythall is a composite settlement made up of discrete and physically separate parts, the Shawbrook Valley cannot be regarded merely as open space within the larger urban area. It is a tract of open countryside of a substantial size relative to the built-up section of Grimes Hill and is physically contiguous with other land to the east and west. The BDLP Inspector remarked: "In simple terms, this gap of open countryside consists of a shallow valley between the built-up areas on higher ground. It is wide enough to maintain a

sense of the physical distinctness of Grimes Hill and Drakes Cross. Site A *[Shawbrook]* consists of virtually the whole of this gap. If it were entirely removed from the Green Belt, to facilitate housebuilding, the sense of physical separation would be lost, contrary to the objective of Policy GB.1(b). That would be so, even if, as suggested by the objector, an open corridor were maintained along the stream. Such an open corridor, whilst no doubt a pleasant feature, would function more like an urban park than a stretch of open countryside. There would be material harm to an important Green Belt purpose." I concur with that assessment. Extensive development in this rural setting would encroach into the countryside and cause neighbouring settlements to merge. It would contribute to the perception of a continuous swathe of development sprawling southwards from the conurbation to the southern edge of Grimes Hills. The objectors' Landscape and Visual Impact Assessment shows that parts of the objection site have become increasingly enclosed as trees and hedgerows have matured. Nevertheless, I am seriously concerned that no matter how much attention is paid to the retention of existing features, new structural planting and the layout of development in an attempt to maintain the existing landscape character, development of such a large tract of land would inevitably result in a high degree of urbanisation. The likely magnitude of landscape change would, I am sure, adversely affect both external views and those obtaining from public footpaths traversing the site.

22.3.63 Set against those Green Belt concerns are the advantages and opportunities highlighted by the objectors. Firstly, the relatively low agricultural quality of the land. Being predominantly Grade 4, with some evidence of tipping, this is significantly below that of most ADR sites promoted by the Council around Bromsgrove and elsewhere. Second is the scope for achieving landscape and ecological improvements through tree planting, particularly along the line of the brookcourse, and the opportunity to secure a major area of public open space. Third is the ability to create a central focus for Wythall by providing a range of community facilities accessible by foot, cycle and public transport. This is illustrated by the objectors' indicative masterplan, refined in the light of the Landscape/Visual Impact appraisal. It shows a local shopping centre, church, school and village green at or close to the junction of Alcester Road and Houndsfield Lane. And lastly, the possibility of accommodating some mixed use development falling within Use Class B1.

22.3.64 I do not seek to belittle those benefits. The relatively low agricultural quality of the land is, in the Bromsgrove context, of particular significance. However, I believe Wythall functions rather differently from most other settlements. Each neighbourhood is served by a local centre that meets everyday needs. The settlement as a whole looks outwards for its higher order services to places like the Maypole on the edge of the conurbation and for most of its employment. Apart from a parish church there are no obvious missing facilities and there is no overt demand for either a 'town centre' or an area of open space along the Shawbrook Valley. The latter is already accessible to residents through a network of public footpaths crossing the site. The provision of some B1 uses on the site

would in my view be likely to have little impact on the degree of self-containment given that Wythall is heavily dependent on commuting to workplaces in the conurbation.

22.3.65 Rather than concentrating much of the District's ADR provision into a single secondary settlement, thereby seriously skewing the overall pattern of safeguarded land, I consider it better to adopt a more equitable distribution. And instead of very large scale development involving radical change I generally favour the organic growth of communities in order to maintain the character of settlements. Applying these principles, I have identified a modest ADR of approximately 6.0ha at Bleakhouse Farm, directly adjoining Grimes Hill (see Paragraphs 1.6.89-1.6.97 of my report).

22.3.66 On the other side of the equation are various site constraints. They include a number of areas of archaeological interest and a Tree Preservation Order. However, given the overall size of the site and the localised nature of these features, I am satisfied that none would be likely to seriously inhibit development.

22.3.67 It is argued by the objectors that since the BDLP Inspector's report was published there have been material changes in circumstances which now support designation of the larger Shawbrook site as an ADR. These relate to revised government guidance (RPG11, April 1998; PPG1, February 1997; PPG3, March 2000; PPG13, March 2001) and a new Structure Plan. Together, these place greater emphasis on sustainable development, building communities, mixed land uses and accommodating the needs of migrant households. However, I note that the principles of sustainability were already embodied in the September 1995 version of RPG11. They were referred to by the previous Inspector in his report and argued in support of the Shawbrook proposal at the last inquiry. And the encouragement of mixed-use development was likewise a matter that was previously considered.

22.3.68 The Council accepts that the possibility of achieving employment development on part of the site was not before the last Inspector. However, I note that at the time of the 1995/6 inquiry provision had been made for employment development at Wythall Green. This led the objector to indicate in evidence that the Shawbrook area could "balance the provision made for substantial employment development at Wythall." Moreover, from comments made the BDLP Inspector was well aware that ADRs are intended to be flexible designations capable of accommodating, where appropriate, land uses other than housing.

22.3.69 As regards in-migration, this is not a new factor. At the time of the last inquiry, RPG11 indicated that migration would be a component of housing need in Worcestershire to 2011, particularly in the 'Central Crescent'. Neither does the WCSP lend support to the scale of the objectors' proposals. A lower housing target for Bromsgrove District means that there is less need for ADR land than originally envisaged by the BDLP Inspector. In any event, the previous Inspector

found against this site essentially for Green Belt reasons - and those circumstances have not changed at all during the interim period.

22.3.70 To summarise my views, I accept that Wythall is a sustainable settlement where some ADR provision is appropriate. The need to identify sufficient safeguarded land constitutes the exceptional circumstance necessary for the release of confirmed Green Belt. However, the objection site forms an extensive area of open countryside that performs a crucial role in preventing Drakes Cross and Grimes Hill from merging with each other. In my opinion the benefits that would accrue from development of Shawbrook as a whole would be outweighed by the harm caused to the integrity of the Green Belt. I find that circumstances have not changed in most material respects from what they were in 1997. I concur with the BDLP Inspector who recommended against the designation of this site as an ADR.

22.3.71 **Issue 9:** *(Alcester Road, Lickey End)* An ADR 'omission' site of 6.7ha is proposed by Bovis Homes Ltd on the southern edge of Lickey End, which is one of the satellite settlements just to the north of Bromsgrove town. The land is bounded by Alcester Road to the east, the built-up area of Lickey End to the north, the curtilages of residential properties fronting the A38 Birmingham Road to the north-west, and Spadesbourne Brook to the south and south-west. Beyond the brookcourse Ashbourne Hill rises steeply to form a prominent topographical feature. The site slopes gently to the south and is divided into 2 sections by a track running southwards from School Lane towards Crows Mill. It lies within an area of interim Green Belt and comprises Grade 3a agricultural land.

22.3.72 Examining first the Green Belt implications, the objector argues that the site does not fulfil any significant Green Belt purpose other than stopping potential encroachment into the countryside which is common to all greenfield sites on the edge of urban areas. This is because the land is physically and visually well-contained by Spadesbourne Brook and Ashbourne Hill. These provide a convincing barrier against any further southern expansion of the settlement. The land was considered by the BDLP Inspector for both partial residential development and as a potential ADR. He concluded that in the context of the need to find some 230ha of safeguarded land this site should be considered as a possible ADR. In the objector's view there has been no material change in circumstances since that time that would justify not designating the site. At both Local Plan inquiries the Council has accepted that if further land is required for ADR purposes then this land would be suitable.

22.3.73 I cannot agree with the objector for two reasons. Firstly, there is now a reduced need for safeguarded land as a result of new Structure Plan housing targets to 2011 and allowances made for small/medium windfalls and brownfield sites. The direction that emerging RPG is taking suggests that future housing requirements could be even less. I have found that the quantity of ADR land identified in the BDLPPM should be sufficient to last until about 2021, thereby giving the

necessary permanence to Green Belt boundaries. Clearly, this represents a major change in circumstances since 1997. Secondly, and contrary to the position taken by the Council, I believe this land fulfils another equally important Green Belt purpose in preventing neighbouring settlements from merging into one another. The site connects visually with land south-west of the site, and with land west of the A38 at BROM5 which I have already concluded should not go forward as an ADR. Together, these areas of land maintain a degree of separation, either actual or perceived, that I consider to be vital in preventing Lickey End from coalescing with Bromsgrove town.

22.3.74 Turning to the sustainability of this site, it lies within the 5 minute drive isochrone of Bromsgrove railway station. The land is also very close to the A38 bus corridor linking Bromsgrove town and Birmingham, with some bus services running along School Lane and Alcester Road. It is therefore within a Transport Corridor as defined by the County Council. As regards other facilities, the BDLP Inspector remarked: "There are some facilities in Lickey End and the site is within reasonable range of the much more extensive services in Bromsgrove town." Like the previous Inspector, I accept that the objection site is in a sustainable location.

22.3.75 The land is of Grade 3a agricultural quality. Although this is still some of the 'best and most versatile' farming land it is by no means unusual or of the very highest quality when considered in the Bromsgrove context. Given that some ADRs promoted by the Council are Grades 1 or 2 this is not a factor that I feel should be held against this site. Likewise, the presence of an aquifer is not a significant constraint and I accept that there are no known archaeological remains on the site that could inhibit development. The Highway Authority says that its long-term aim is to provide an additional link between the B4096 Alcester Road and the A38 Birmingham Road across this land. Neither that nor the likely inability of this relatively small site to accommodate mixed-use development constitute, in my opinion, significant drawbacks.

22.3.76 The objector criticises the Council's comparative ADR matrix on a number of grounds. They include inconsistencies, errors and inaccuracies. Furthermore, the grouping of sites significantly distorts the overall scores resulting in an inappropriate basis for decision-making. I have already considered the adequacy of that methodology elsewhere in my report and place little reliance upon it. The Council has admitted that it was intended to be used as a first sift only, to exclude the very worst performing sites from further consideration. Consequently, I see little point in examining the scores in detail.

22.3.77 To sum up, I find that this site has an important role to play in preventing the coalescence of settlements. The harm caused to that Green Belt purpose is not outweighed by its sustainability or lack of constraints. I believe that a much reduced requirement for ADR land, relative to that envisaged by the BDLP Inspector in 1997, rules this site out of contention. I recommend accordingly.

22.3.78 **Issue 10:** An error has been made in the Schedule of Proposed Modifications, Document 3 (but not in the BDLPPM, June 2000). The Council has accepted the previous Inspector's recommendation in respect of Paragraph 14.5 of the BDLP. However, the proposed modification ENV/MOD3 refers to Paragraph 14.1 which has not changed from the earlier version of the Plan. I agree with the objector and the Council that this needs correcting in the interests of good housekeeping. I note that the change of title from 'Aquifer Protection Zones' to 'Groundwater Protection' is relevant only to Policy ES4 and not to Paragraph 14.5 of Policy ES3.

Recommendations

22.3.79 (a) That Appendix 3A (Areas of Development Restraint) be included in the Schedule of Proposed Modifications, Document 3.

(f) That Proposed Modification APPEND/MOD11 be not made.

(g) That the error in Proposed Modification ENV/MOD3 set out in the Schedule of Proposed Modifications, Document 3, be corrected.

(h) That land off Whitford Road, Bromsgrove be designated as an ADR and excluded from the Green Belt.

(i) That Appendix 3A be revised, as set out below, to take account of the recommendations made in this report.

(f) That no further modifications be made to the Plan in respect of these objections.

APPENDIX 3A: AREAS OF DEVELOPMENT RESTRAINT

Policy	Location	Site Area
ALVE6	Land adjacent to Crown Meadow, Alvechurch	1.4ha
ALVE7	Land north of Old Rectory Lane, Alvechurch	1.1ha
ALVE8	Land south of Old Rectory Lane, Alvechurch	2.8ha
New ADR	Alvechurch Brickworks, Scarfield Hill, Alvechurch	2.4ha
New ADR	Land at Kendal End Road, Barnt Green	5.0ha
BROM5A	Land at Perryfields Road East, Bromsgrove	34.7ha
BROM5C	Land adjacent to Wagon Works, Bromsgrove	7.8ha
BROM5D	Land at Perryfields Road West, Bromsgrove	13.9ha
New ADR	Land off Whitford Road, Bromsgrove	26.0ha approx
New ADR	Land off Church Road, Catshill	6.1ha
FR4	Land off Egghill Lane, Frankley	6.6ha
HAG2	Kidderminster Road South, Hagley	10.5ha
HAG2A	Algoa House,Western Road, Hagley	1.6ha
New ADR	Land south of Kidderminster Road, Hagley	10.5ha
WYT15	Land at Selsdon Close, Wythall	3.1ha
New ADR	Land at Bleakhouse Farm, Wythall	6.0ha approx
	TOTAL	**139.5ha approx**

EMPLOYMENT RELATED AREA OF DEVELOPMENT RESTRAINT FOR REDDITCH

Policy	Location	Site Area
BE3	Ravensbank Drive, Beoley/Redditch	10.3ha
	TOTAL	**10.3ha**

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PROPOSALS MAP

23.1 Overview

23.1.1 I recommend that the line of the Kidderminster-Blakedown-Hagley by-pass be shown on the Proposals Map.

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23.2 PROPOSALS MAP

1/1000 Worcestershire County Council

Key Issue

23.2.2 Whether the line of the Kidderminster-Blakedown-Hagley by-pass should be indicated on the Proposals Map.

Inspector's Appraisal and Conclusions

23.2.3 The question of safeguarding the route of the Kidderminster-Blakedown-Hagley by-pass was considered in Section 9.3 of my report, in response to objections to Policy TR2. My conclusion was to accept the Council's Further Change 4. Consequently, this objection has been satisfied.

Recommendation

23.2.4 That the Plan be modified in accordance with Further Change 4 and the Proposals Map be altered accordingly.

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