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Bromsgrove District Council

Bromsgrove District Plan Review Further Issues Consultation

Sustainability Appraisal Report Addendum

FINAL









Report for

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1. Introduction

1.1 Overview

- Bromsgrove District Council (the Council) is currently undertaking a review of the adopted Bromsgrove District Plan (BDP). The BDP Review will set out the Vision, objectives, planning policies and site allocations that will guide development in the District for at least a 15-year period from adoption of the District Plan.
- As part of the BDP Review, consultation took place between the 24th September and 19th November 2018 on the BDP Review Issues and Options consultation document¹. This included a draft vision, provisional strategic objectives and a range of issues including housing, employment, transport, social infrastructure and the natural environment.
- Wood has been commissioned by the Council to undertake a Sustainability Appraisal (SA) of the BDP. The SA will appraise the environmental, social and economic performance of the District Plan and any reasonable alternatives. In doing so, it will help to inform the selection of Plan Options concerning (in particular) the quantum, distribution and location of future development in the District and identify measures to avoid, minimise or mitigate any potential negative effects that may arise from the Plan's implementation as well as opportunities to improve the contribution of the District Plan towards sustainability. Wood completed a SA Report² (the 2018 SA Report) of the BDP Review Issues and Options document. The SA Report was issued as part of the suite of reports to support the consultation.
- Following the subsequent analysis of the submissions received to the 2018 consultation and interim outputs from evidence base studies, the Council has prepared a short consultation document (the 'Further Issues' consultation document) to provide an update on the key strategic issues which are likely to guide the BDP Review.
- This document is an addendum to the 2018 SA Report and has been prepared in order to take account of, and appraise, the further options contained in the Further Issues consultation document. The addendum assesses the likely significant effects of the options in order to update the 2018 SA Report (as appropriate) and ensure that all the likely significant effects of this stage of the emerging BDP have been identified, described and evaluated.

1.2 The BDP Review and the Further Issues consultation document

The current planning policies for Bromsgrove District can be found in BDP (2011-2030), which was adopted in January 2017 and caveated with a need to undertake a Plan Review by 2023 (Policy BDP3) as the Council was unable to allocate sufficient housing land in locations not covered by Green Belt designation. The Plan Review is needed to ensure that the full housing requirement for Bromsgrove District up to 2030 and beyond can be delivered. Furthermore, Bromsgrove District Council has a duty to consider whether there are any realistic options to assist the West Midlands conurbation in meeting its current housing shortfall. As Green Belt boundaries should only be altered as part of plan preparation or review, and only in exceptional circumstances (NPPF para

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¹ BDC (2018) Bromsgrove District Plan Review Issues and Options Consultation Document, September 2018. Available from: https://www.bromsgrove.gov.uk/media/3926027/Issues-and-Options-Consultation-Document-24-09-18.pdf

² Wood (2018) *Bromsgrove District Plan Review Issues and Options Sustainability Appraisal Report.* Available from: https://www.bromsgrove.gov.uk/media/3916715/Issues-and-Options-SA-Report-Aug-18-.pdf



135), the Council is taking this opportunity to review the District Plan in its entirety and to extend its longevity.

- In September 2018, the Council published the BDP Review Issues and Options Consultation Document which comprised the following core components:
 - An overview of the District and background to the review of the District Plan;
 - The proposed Vision and Strategic Objectives for the District Plan;
 - Issues and Options for selected topics.
- The Further Issues consultation document is a high level document that outlines the next steps towards developing a preferred spatial strategy and accompanying policies for Bromsgrove. It provides a direction of travel for the Council, commenting on a range of issues including growth, spatial strategy, Green Belt, infrastructure provision ad neighbourhood planning.
- Largely the draft document avoids supplementing the issues and options outlined in the 2018 consultation document; however, in one regard it signals a further option that was not included in the previous consultation document. Specifically, in terms of employment growth, it states:
 - "The BDP will also look to provide a step change in employment delivery to ensure that Bromsgrove's economy can grow in a sustainable but positive manner. Basic economic forecasting would suggest that over the period to 2040 only a very small amount of additional employment land would be required. In order to investigate this step change further, more detailed scenarios have been developed [our emphasis] which suggest that the new employment land required for the District could be up to 90 hectares."
- The more detailed scenarios referenced in the consultation document reflect an evidence base study³ considering future employment growth for the District. In particular, this has considered three scenarios, with indicative levels of growth provided to Wood by the Council:
 - Scenario 1 (low growth): requiring 1 30 ha of employment land indicative growth option to appraise 5ha;
 - Scenario 2 'medium growth': requiring 31 60 ha of employment land indicative growth option to appraise 45 ha;
 - Scenario 3 'high growth': requiring 61 90ha of employment land indicative growth option to appraise 90ha.
- To ensure any sustainability effects have been identified, described and evaluated, consistent with the SA of the strategic options contained in the 2018 BDP Review Issues and Options document, the Council asked Wood to complete an SA of the three employment indicative growth scenarios and options.

1.3 Purpose of this SA Report

The Requirement for Sustainability Appraisal

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of European

³ Aecom (2019) Bromsgrove employment land needs analysis



Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the Strategic Environmental Assessment (SEA) Directive, and its transposing regulations the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633) (the SEA Regulations).

At paragraph 16 the National Planning Policy Framework (NPPF) (2019) 4 sets out that local plans must be prepared with the objective of contributing to the achievement of sustainable development. In this context, paragraph 32 reiterates the requirement for SA/SEA as it relates to local plan preparation:

"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."

The Planning Practice Guidance (PPG) (2019)⁵ also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. For example paragraph 18 of the PPG⁶ for SA/SEA states "

"The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted."

- In this regard, SA will help to ensure that a local plan is "justified", a key test of soundness that concerns the extent to which the plan is an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.
- In consequence, Wood has completed the SA of the three employment growth scenarios to ensure any sustainability effects have been identified, described and evaluated, consistent with the SA of the strategic options contained in the 2018 BDP Review Issues and Options document and in compliance with the reasonable alternative requirements of the SEA Directive and regulations⁷ and the PPG.

Stages in the Sustainability Appraisal Process

- 1.3.2 There are five key stages in the SA process.
- The first stage (**Stage A**) led to the production of a SA Scoping Report. Informed by a review of other relevant polices, plans and programmes as well as baseline information and the identification of key sustainability issues affecting the District, the Scoping Report set out the proposed framework for the appraisal of the District Plan (the SA Framework).
- The Scoping Report was subject to consultation that ran from 15th March to 19th April 2018. A total of 4 responses were received to the consultation from the statutory SEA consultation bodies (Natural England, the Environment Agency and Historic England) and one Parish council.

⁴ Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework*. Available from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

⁵ Ministry of Housing, Communities and Local Government (2019) *Planning Practice Guidance*. Available from https://www.gov.uk/government/collections/planning-practice-guidance

⁶ Ministry of Housing, Communities and Local Government (2019) *Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal.* Available from https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

⁷ Article 5(1) And Annex I (h) of the SEA Directive 2001/42/EC and Regulation 12 (2) and Schedule 2 (8) of the SEA Regulations 2004



Responses related to all aspects of the Scoping Report and resulted in amendments to the SA Framework.

- Stage B is an iterative process involving the ongoing appraisal and refinement of the BDP. This report has been prepared as a part of Stage B of the SA and considers the effects of the Further Issues consultation document. It is being published for consultation alongside the BDP Further Issues consultation document.
- Subsequent reports will be prepared as a part of **Stage C** of the SA and will consider the effects of the Preferred Options, Publication and Submission Draft District Plan stages. These will be considered by an independent Planning Inspector (**Stage D**).
- Following Examination in Public (EiP), and subject to any significant changes to the Submission District Plan that may require appraisal as a result of the EiP, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the District Plan. This will set out the results of the consultation and SA process and the extent to which the findings of the SA have been accommodated in the adopted District Plan. During the period of the District Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

1.4 This Report

- 1.4.1 This SA Report is structured as follows:
 - **Section 1: Introduction** Includes a summary of the BDP Review, an overview of the SA process to-date and outlines the purpose of this report and its contents;
 - Section 2: Approach to Appraisal Describes the approach to appraisal;
 - Section 3: Appraisal of Employment Options Summarises the findings of the appraisal of the three employment scenarios and options;
 - Section 4: Next Steps: Presents the conclusions and details the next steps for the SA of the BDP Review.
- 1.4.2 This report should be read in conjunction with the 2018 SA Report. 8

⁸ Wood (2018) *Bromsgrove District Plan Review Issues and Options Sustainability Appraisal Report.* Available from: https://www.bromsgrove.gov.uk/media/3916715/Issues-and-Options-SA-Report-Aug-18-.pdf

2. Approach to Appraisal

2.1 Introduction

- This section outlines the methodology used to appraise the employment options. **Section 2.2** sets out the SA Framework that has been used to appraise the options and **Section 2.3** sets out the methodology for their appraisal. **Section 2.4** summarises the approach to assessment of the cumulative effects. **Section 2.5** documents the difficulties encountered during the appraisal process including key uncertainties and assumptions.
- The SA objectives and appraisal methodology are consistent with the approach adopted for the appraisal of the BDP Review Issues and Options consultation document.

2.2 The Appraisal Framework

- The SA Framework comprises SA objectives and guide questions derived from the review of policies, plans and programmes and baseline information gathered for the BDP, along with comments from consultees. This information is presented in Sections 2 and 3 and Appendix B of the 2018 SA Report.
- Broadly, the SA objectives define the long term aspirations for the District with regard to social, economic and environmental considerations and it is against these objectives that the performance of District Plan proposals will be appraised.
- **Table 2.1** presents the SA Framework including SA objectives and associated guide questions. The SEA Directive topic(s) to which each of the SA objectives relates is included in the third column.

Table 2.1 Sustainability Appraisal Framework

SA Objectives	Guide Questions	SEA Directive Topic(s)	
1. To protect and enhance the quality of water, soil and air.	 Will it provide opportunities to improve or maintain water quality? Will it encourage sustainable and efficient management of water resources? Will it ensure that essential water infrastructure is appropriately planned and co-ordinated with all new development? Will it provide opportunities to improve and maintain soil quality? Will it improve and maintain air quality? Will it address air quality issues in the Air Quality Management Areas (AQMA) and prevent new designations of AQMA? Will it help to improve failing waterbodies through appropriate mechanisms such as SuDS and improvements to watercourses (including new watercourses, or opening up of culverted streams)? 	Air, Soil and Water.	
2. To ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, maximising of previously developed land and reuse of vacant buildings where this is not	 Will it safeguard the District's mineral resources? Will it help to protect the District's best and most versatile agricultural land from adverse developments? Will it maximise the use of Previously Developed Land? Will it reduce the amount of contaminated, derelict, degraded and under-used land? Will it encourage the reuse of existing buildings and infrastructure? 	Material Assets Biodiversity, Fauna and Flora.	

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SA Objectives	Guide Questions	SEA Directive Topic(s)
detrimental to open space and biodiversity interest.	Will it protect the District's open spaces of recreational and amenity value?	
3. To manage waste in accordance with the waste hierarchy: 1) Prevention 2) Preparing for reuse 3) Recycling 4) Other recovery 5) Disposal	 Will it minimise the demand for raw materials? Will there be opportunities to increase recycling? Will it reduce the production of waste and manage waste in accordance with the waste hierarchy? Will it ensure the design and layout of new development supports sustainable waste management? 	Material Assets.
4. To ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to all sources of flooding.	 Will it protect the floodplain from inappropriate development? Will it promote patterns of spatial development that are adaptable to and suitable for predicted changes in climate change? Will it help to minimise the risk of flooding to people and property in new and existing developments? Will it ensure that new development does not give rise to flood risk elsewhere? Will it (development) improve and/or reduce flood risk (betterment and flood risk reduction opportunities)? Will it promote sustainable drainage systems where appropriate? 	Human health and climatic factors.
5. To reduce the causes of and adapt to the impacts of climate change.	 Will it reduce emissions of greenhouse gases? Will it promote patterns of spatial development that are adaptable to and suitable for predicted changes in climate? Will the plan promote measures to mitigate the causes of climate change? Will it support the delivery of renewable and low carbon energy and reduce dependency on non-renewable sources? Will it encourage opportunities for the production of renewable and low carbon energy? Will it promote greater energy efficiency? Will it encourage opportunities to achieve energy efficiency measures above the minimum building regulations standard? Will it encourage innovative and environmentally friendly technologies? Will it encourage water efficiency targets above building regulations? 	Human health, and climate factors.
6. To conserve and enhance biodiversity and geodiversity and promote improvements to the green infrastructure network.	 Will it help to safeguard the District's biodiversity and geodiversity? Will it provide opportunities to enhance local biodiversity/geodiversity in both urban and rural areas? Will it help to achieve targets set out in the Biodiversity and Geodiversity Action Plans? Will the plan protect sites and habitats designated for nature conservation, including protected species? Will it enhance ecological connectivity and maintain and improve the green infrastructure network? Will it provide opportunities for people to access the natural environment? 	Biodiversity, fauna, and flora.
7. To conserve and enhance landscape character and townscape.	 Will it conserve and enhance landscape character and townscape? Will it promote high quality design in context with its urban and rural landscape? 	Landscape.



SA Objectives	Guide Questions	SEA Directive Topic(s)
	Will it protect and improve the distinctive local character of the District?	
8. To conserve and enhance the historic environment, cultural heritage, character and setting.	 Will it preserve, protect and enhance conservation areas, listed buildings, archaeological remains, historic parks and gardens and their settings and other features and areas of historic and cultural value? (i.e. designated and non-designated heritage assets) Will it tackle heritage assets identified as being 'at risk'? Will it improve the quality of the built environment? Will it make the most of opportunities to proactively enhance the contribution that the historic environment makes to quality of life and other elements of the local plan? 	Cultural Heritage.
9. To improve the health and well-being of the population and reduce inequalities in health.	 Will the plan improve access to health facilities? Will the plan help to improve quality of life for residents? Will the plan promote healthier lifestyles? Will the plan mitigate against noise pollution? Will the plan mitigate against light pollution? Will the plan seek to provide high quality well designed environments? Will it maintain and improve access to open space, leisure and recreational facilities? Will the plan promote mixed developments that encourages natural surveillance? Will it promote community safety? Will it reduce actual levels of crime and anti-social behaviour? Will it reduce the fear of crime? Will it promote design that discourages crime? 	Population and human health.
10. To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community.	 Will the plan proposals incorporate consultation with local communities? Will the plan promote wider community engagement and civic responsibility? 	Population.
11. To provide decent affordable housing for all, of the right quality and tenure and for local needs, in a clean, safe and pleasant local environment.	 Will the plan provide opportunities to increase affordable housing levels within urban and rural areas of the District? Will it support the provision of a range of house types, tenures and sizes to meet the needs of all part of the community? Will the plan seek to provide high quality well designed homes and residential environments? Will it provide housing in sustainable locations that allow easy access to a range of local services and facilities? Will the plan provide opportunities for the construction of sustainable homes? 	Population.
12. To improve the vitality and viability of Town Centres, other centres and communities and the quality of, and equitable access to, local services and facilities regardless of age,	 Will plan proposals maintain and enhance the provision of local services and facilities? Will the plan contribute to rural service provision across the District? Will it enhance the viability and vitality of Bromsgrove town centre and local centres across the District? Will the plan enhance accessibility to services by public transport? 	Population.



SA Objectives	Guide Questions	SEA Directive Topic(s)
gender, ethnicity, disability, socio- economic status or educational attainment	 Will it tackle deprivation in the most deprived areas and reduce inequalities in access to education, employment and services? 	
13. To develop a knowledge driven economy which supports the development of new technologies of high value, accompanied by supporting the infrastructure, whilst ensuring all share the benefits, whether urban and rural.	 Will it contribute towards urban and rural regeneration? Will it promote and support the development of innovative and knowledge-based technologies of high value and low environmental impact? Will it support expansion of the manufacturing sector? Will it provide opportunities for existing and new businesses to grow and develop to enhance their competitiveness? Will it provide sufficient employment land in locations that are attractive to the market and well-served by transport and other infrastructure? Will it provide good quality, well paid employment opportunities that meet the needs of local people? 	Population.
14. To raise the skill levels and qualifications of the workforce and the quality of education for all.	 Will it promote investment in educational establishments to meet the changing demands of the population and economy? Will it improve access to training to raise employment potential? Will it provide, support and improve access to high quality educational facilities? Will it help to raise educational attainment and skills? 	Population.
15. To increase sustainable travel choices and move towards more sustainable travel patterns.	 Will it reduce the need to travel? Will it provide opportunities to increase sustainable modes of travel? Will it focus development in existing centres, and make use of existing infrastructure to reduce the need to travel? Will it support investment in transport infrastructure? 	Population.

2.3 Methodology

- Based on the contents of the Further Issues consultation document detailed in **Section 1.2**, the SA Framework has been used to appraise the following three scenarios, with indicative growth options:
 - Scenario 1 (low growth): requiring 1 30 ha of employment land indicative growth option to appraise 5ha;
 - Scenario 2 'medium growth': requiring 31 60 ha of employment land indicative growth option to appraise 45 ha;
 - Scenario 3 'high growth': requiring 61 90ha of employment land indicative growth option to appraise 90ha.
- No other options have been identified within the Further Issues consultation document.
- Each of the indicative employment growth options has been appraised using an appraisal matrix, which includes:
 - The SA Objectives;
 - A score indicating the nature of the effect for each option on each SA Objective;



- A commentary on significant effects (including consideration of the cumulative, synergistic and secondary effects as well as the geography, duration, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
- Recommendations, including any mitigation or enhancements measures.
- The format of the matrix used in the appraisal is shown in **Table 2.2** below. A qualitative scoring system has been adopted which is set out in **Table 2.3**.

Table 2.2 Appraisal Matrix format – Employment Growth Options

SA Objective	Option:	Commentary on effects of each option
	Score	
To ensure everyone has the opportunity to live in a decent and affordable home	++	Likely Significant Effects A description of the likely effects of each option on the SA Objective will be provided here. Mitigation Mitigation and enhancement measures will be outlined here. Assumptions Any assumptions made in undertaking the appraisal will be listed here. Uncertainties Any uncertainties encountered during the appraisal will be listed here.

Table 2.3 Scoring System

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	1
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

The approach repeats the approach to the appraisal of the development requirements and the 'Broad Options for Development Distribution' contained in the 2018 SA Report.

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Cumulative, Synergistic and Secondary Effects

- The SEA Directive and SEA Regulations require that the cumulative, synergistic and secondary effects of the Draft District Plan are assessed. In particular, it is important to consider the combined sustainability effects of the policies and proposals of the Draft District Plan both alone and incombination with other plans and programmes.
- As this is the appraisal of the Further Issues consultation document it does not contain any preferred policies or sites these will be included in Preferred Options Plan which is the next iteration. Appraisal of the District Plan policies will be undertaken by chapter/subsection in order to determine the cumulative effects of each policy area/topic. In addition, a cumulative effects assessment will be undertaken in order to identify the interaction between policies and the interaction between potential sites. Additional commentary will also be provided with respect to where the policies and proposals of the Draft District Plan may have effects in-combination with other plans and programmes.

2.4 When the SA was Undertaken and by Whom

2.4.1 This SA of the Further Issues consultation document was undertaken by Wood in summer 2019.

2.5 Difficulties Encountered in Undertaking the Appraisal

- The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. These uncertainties and assumptions are detailed in the appraisal matrices.
- The District Plan is at an early stage in its development and the appraisal of the three employment options is challenging because of the uncertainties around the distribution of development across the District (whether allocated to small sites, a mix of small and large sites or large mix use sites) as well as uncertainties as to the location (and so whether on greenfield or brownfield and proximity to sensitive or designated features). These uncertainties have made it difficult to comment, on a consistent basis, on the potential significant effects (positive and negative) that an option might have. In consequence, many of the effects identified for each option against the SA objectives includes a question mark indicating the uncertainties at this stage.
- Additional information on difficulties and assumptions will be provided in future iterations of the SA Report.

3. Appraisal of Employment Options

3.1 Introduction

- The BDP Review Issues and Options Consultation Document (and the SA thereof) considered a range of employment and economy issues and options:
 - Growing the Local Economy (four Options identified);
 - The Type and Location of Employment Land (four Options identified);
 - Employment Opportunities in Rural Bromsgrove (two Options identified); and
 - Telecommunications.
- However, whilst growth was considered qualitatively, the consultation document did not quantify the scale of employment growth. The Further Issues consultation document has addressed this and states that "more detailed scenarios have been developed which suggest that the new employment land required for the District could be up to 90 hectares". In support of this, three employment scenarios have been developed, with indicative levels of growth provided to Wood by the Council:
 - Scenario 1 (low growth): requiring 1 30 ha of employment land indicative growth option to appraise 5ha;
 - Scenario 2 'medium growth': requiring 31 60 ha of employment land indicative growth option to appraise 45 ha;
 - Scenario 3 'high growth': requiring 61 90ha of employment land indicative growth option to appraise 90ha.
- These three options have been appraised (with the detailed findings presented in individual matrices in **Appendix A**) and summarised below.

3.2 Appraisal findings

A comparative assessment of the three employment growth options is provided in **Table 3.1** and the results of the appraisal against each SA Objective are also discussed below. Unless otherwise stated in the matrices, all effects are considered to be permanent, applicable in the short, medium and long terms and of District-wide significance.

Table 3.1 Summary of SA of the Employment Options

SA OBJECTIVES	1. Low Growth Option: 1-30ha (Indicative growth of ~5ha)	2. Medium Growth Option: 31-60ha (Indicative growth of ~45ha)	3. High Growth Option: 61–90ha (Indicative Growth of ~90ha)
1. Water, Soil and Air Quality	+/-/?	+117	+/++//?
2. Land Use	+/-/?	+117	+/++//?
3. Waste	-/?	N	P
4. Flood Risk	+/-	++/	++/
5. Climate Change	+/-	++J	+/
6. Biodiversity	+/-/?	++//-/?	++//?
7. Landscape	-/?	17:	
8. Cultural Heritage	?	?	?
9. Health and Well-being	+/-	+/-	++/
10. Community Participation	0	0	0
11. Housing	~	~	~
12. Town Centre Vitality and Community Facilities and Services	+/?	++/?	++/?
13. Economy	+/?	++/?	++/?
14. Education	+/?	++/?	++/?
15. Travel	+/-/?	++//?	+117

Low Growth Option: 1-30ha of Employment Land (Indicative Growth of ~5ha)

The low growth option would see the development of (indicatively) ~5ha of new employment land. This option would have a range of positive, negative and uncertain effects. Due to the scale of the



growth proposed in this option (~5ha), such effects would be likely to be minor in nature, particularly when compared to the medium and high growth options.

- There would be opportunities to promote the use of public transport (SA objective 15) but the reality of economic growth (even through this low growth option) would also see an increase in car and HGV use. The associated emissions would have minor negative effects on air quality (SA objective 1), which would be likely to exacerbate problems in the District's AQMAs and in neighbouring authorities AQMAs, and on climate change (SA objective 5) and health (SA objective 9).
- The scale of development proposed (~5ha) is likely to result in a relatively small amount of greenfield land take (it would be probable that there would be a number of smaller sites developed under this option, some of which may be on brownfield land). Consequently, there would be minor positive and negative effects on land use (SA objective 2) and soils (SA objective 1).
- This option would be unlikely to result in the development of (m)any large development sites and therefore there would be fewer opportunities for gaining positive effects from the 'economies of scale'. This would lessen the potential positive effects from the incorporation of green infrastructure and renewable energy and therefore less potential to help to mitigate the adverse effects of climate change (SA objective 5), relative to the other options.
- As previously identified there would likely be some loss of greenfield land, however the scale of development on greenfield would be relatively small and so mixed minor negative and uncertain landscape effects (SA objective 7) are identified.
- 32.7 Cultural heritage effects are uncertain, subject to the precise location of development although with this scale of development, effects would be unlikely to be significant (both negative effects and any positive effects through enhancements).
- This option would have mixed minor positive and uncertain economic effects (SA objective 13). Development (indicatively) of ~5ha of new employment would provide new employment opportunities, and if located on a number of sites, may help to meet needs across the District. Provision of employment land would help to attract some inward investment to the District which would help support the vitality of Bromsgrove Town Centre and other centres. However, these effects have been appraised as minor positive and uncertain on SA objectives 12 and 14. The extent of positive effects is uncertain as development at this scale may not provide sufficient employment land to meet future development and workforce needs.
- Minor positive and negative effects with some uncertainty is identified for transport (SA objective 15), reflecting the potential for increased public transport use, but also an increase in car and HGV use (although at this scale of development it would be unlikely to be significant). There is some uncertainty over the extent of effects as the use of public transport is partly dependent on behavioural choices.

Medium Growth Option: 31-60ha of Employment Land (Indicative Growth of ~45ha)

- The medium growth option would see the development (indicatively) of ~45ha of new employment land. This option would have a range of positive, negative and uncertain effects that would overall be greater than for the low growth option.
- There would be opportunities to promote the use of public transport (SA objective 15) which at this scale of development could be significant, but it would also seem likely that it would be associated with a significant increase in car and HGV use (although the latter would then depend on the nature of the employment use). The associated emissions could have significant negative effects on air quality (SA objective 1), which would be likely to exacerbate problems in the District's



AQMAs and in neighbouring authorities AQMAs, and also have significant negative effects on climate change (SA objective 5) and health (SA objective 9).

- Through this scale of development there would be opportunities to develop some larger sites which would provide opportunities for incorporation of green infrastructure, SuDS and renewable energy which would have associated significant positive effects on SA objectives 1, 4 and 5.
- Through the development (indicatively) of ~45ha of new employment land there would be loss of greenfield land, which could be significant at this scale of development. Whilst there could be opportunities to re-use brownfield land subject to the location and scale of development, it is also noted that many of the available brownfield sites in the District have now been redeveloped. Consequently, minor positive and significant negative effects on land use (SA objective 2) are identified.
- With development at this scale (indicatively ~45ha) it would be difficult to avoid locating development in areas which could have significant negative effects on important biodiversity sites, subject to the location and scale of development. However, there would also be significant opportunities to incorporate biodiversity enhancements. Significant positive and negative effects are identified on biodiversity (SA objective 6) with some uncertainty, subject to the location of development.
- As previously identified there would likely be some loss of greenfield land, which at the indicative option scale could be significant for landscape, subject to the location of development. In consequence, significant negative effects on landscape (SA objective 7) with some uncertainty is identified.
- 3.2.16 Cultural heritage effects are uncertain but could be significant at this scale of development, subject to the precise location and nature of development.
- This option would have positive economic effects (SA objective 13). Development (indicatively) of ~45ha of new employment would provide new employment opportunities and help to attract inward investment to the District. Development at this scale would support the vitality of Bromsgrove Town Centre and other centres and would be likely to provide training and education opportunities through the development of some large-scale employment sites, although the number of such sites would likely be smaller than for the high growth option.
- This option would have significant positive effects on SA objectives 12 and 14, with some uncertainty. However, development at this scale may also result in development in more rural parts of the District where there would be greater reliance on the car and reduced access to services, so some uncertainty is also identified.
- Significant positive and significant negative effects with some uncertainty is identified for transport (SA objective 15), reflecting the potential for increased public transport use, but that with this scale of development there would be a significant increase in car and HGV use. There is some uncertainty over the extent of effects as the use of public transport is partly dependent on behavioural choices.

High Growth Option 61-90ha (Indicative growth of ~90ha)

- The high growth option would see the development (indicatively) of ~90ha of new employment land. This option would have a range of positive, negative and uncertain effects. With this scale of development, a number of significant effects have been identified.
- Whilst there would be opportunities to promote the use of public transport (which could be significant with this scale of growth and development), it is also expected that there would be a significant increase in car and HGV use. The associated emissions would have significant negative



effects on air quality (SA objective 1), which would be likely to significantly exacerbate problems in the District's AQMAs and in neighbouring authorities AQMAs, and also have significant negative effects on climate change (SA objective 5) and health (SA objective 9).

- There may be opportunities with the development of larger scale sites to incorporate SuDS (SA objective 4) to help mitigate flood risk and renewable energy which would help to mitigate the adverse effects of climate change (SA objective 5).
- This option would require the greatest land take, which could have significant negative effects on agricultural land (SA objective 2) and could also affect soil and water quality (SA objective 1). The lack of available brownfield sites in the District heightens the probability that the majority of growth proposed in this option would need to be on greenfield land.
- There would be a mixture of significant positive and negative effects on biodiversity (SA objective 6), with some uncertainty. At this scale of development (indicatively ~90ha) it would be difficult to avoid any adverse effects on biodiversity, however there would be significant opportunities to provide biodiversity enhancements as part of the development or larger sites. The extent of effects would be subject to the location of development
- This option would have significant negative effects on landscape (SA objective 7). Whilst the precise location of development would fully determine landscape effects, it is likely that through the development (indicatively) of ~90ha of new employment land, a number of larger development sites would be required and in turn a significant amount of greenfield land take.
- As with the low and medium growth options effects on the District's cultural heritage assets (SA objective 8) are uncertain as the precise location of new employment development would fully determine effects. With the scale of growth (and associated new development) proposed through this option it may be difficult to avoid negative effects on heritage, although there could be significant opportunities for heritage enhancements as part of new development, for example the sensitive re-use of Listed Buildings or increasing visitor numbers to heritage attractions.
- This option would have significant positive economic effects (SA objective 13). Development (indicatively) of ~90ha of new employment would provide significant new employment opportunities and help to attract inward investment to the District. Development at this scale would support the vitality of Bromsgrove Town Centre and other centres and would be likely to provide training and education opportunities through the development of large-scale employment sites. This would also have significant positive effects on SA objectives 12 and 14. However, development at this scale may also result in development in more rural parts of the District where there would be greater reliance on the car and reduced access to services (which could be significant with this scale of development).
- Minor positive and significant negative effects with some uncertainty is identified for transport (SA objective 15), reflecting the potential for increased public transport use, but that with this scale of development there would inevitably be a significant increase in car and HGV use. There is some uncertainty over the extent of effects as the use of public transport is partly dependent on behavioural choices.

3.3 Summary

Each of the three employment scenarios and options has a broadly similar range of effects; however, the significance of the effects (both positive and negative) increases with the scale of each option considered.



- No significant effects (either positive or negative) are identified for Option 1 and whilst any negative effects are likely to be minor, it is possible that provision of employment land of ~5 ha would be insufficient to meet future development and workforce needs beyond 2030.
- The SA identified 7 positive and 8 negative significant effects associated with Option 2 reflecting the change in scale between Option 1 (~5 ha) and Option 2 (~45 ha). Significant positive effects are identified for example in terms of town centre vitality (SA objective 12) and economy (SA objective 13), whilst significant negative effects are identified for example in terms of water, soil and air quality (SA objective 2), land use (SA objective 2) and waste (SA objective 3).
- Option 3 is associated with the greatest number of significant positive effects (8), for example in terms of town centre vitality (SA objective 12), economy (SA objective 13) and education (SA objective 14). It is also associated with the largest number of significant negative effects (9), for example in terms of water, soil and air quality (SA objective 2), land use (SA objective 2), waste (SA objective 3), flood risk (SA objective 4), and climate change (SA objective 5). Some of these effects arise from the scale of the growth proposed, whereas others arise from the assumptions regarding the 'economies of scale' that are presented with development of larger sites, for example in terms of the provision of green infrastructure (SA objective 4), renewable energy (SA objective 5) and training opportunities (SA objective 14).
- For many of the effects identified, uncertainties are noted related to the early stage of the plan development, for example in terms of the distribution of development across the District, as well as its location. As the plan development progresses, some of these uncertainties are expected to be resolved and as plan policies are developed, it is likely that many of the negative effects identified could be avoided, minimised, reduced and/or mitigated.

4. Conclusions and Next Steps

- The Further Issues consultation document is a high level document that outlines the next steps towards developing a preferred spatial strategy and accompanying policies for Bromsgrove. Largely the draft document avoids supplementing the issues and options outlined in the 2018 consultation document; however, for employment land, it does state that "more detailed scenarios have been developed which suggest that the new employment land required for the District could be up to 90 hectares." Three scenarios and indicative levels of growth have been identified (low growth, medium growth and high growth) to inform plan development. To ensure any sustainability effects have been identified, described and evaluated, consistent with the SA of the strategic options contained in the 2018 BDP Review Issues and Options document, the three employment indicative growth scenarios and options have been subject to SA.
- Each of the three employment scenarios and options has a broadly similar range of effects; however, the significance of the effects (both positive and negative) increases with the scale of each option considered.
- Whilst no significant effects (either positive or negative) have been identified for Option 1, it is possible that the provision of employment land of ~5 ha would be insufficient to support future growth and workforce needs out to beyond 2030.
- Options 2 and 3 are appraised as broadly similar in the range and significance of effects identified, although the magnitude and likelihood of significant negative effects increases with Option 3. For both options, for many of the effects identified, uncertainties are noted related to the early stage of the plan development, for example in terms of the actual quantum of development (as opposed to an indicative level), the actual location of the development and its distribution across the District. As the plan development progresses, some of these uncertainties are expected to be resolved and as plan policies are developed, it is likely that many of the negative effects could be mitigated.
- Any consultation responses that provide comment on this Addendum to the 2018 SA Report will be summarised (along with the responses received on the 2018 SA Report) and included as an appendix to the SA Report that accompanies the next (Preferred Option) stage of the BDP Review.
- Adoption of the District Plan is due to take place in November 2022. This will be preceded by three principal periods of consultation during which the District Plan will be developed and refined taking into account (*inter-alia*) national planning policy and guidance, the Council's evidence base, the outcomes of consultation and the findings of socio-economic and environmental assessments and appraisal including SA, prior to submission to the Secretary of State and subsequent Examination in Public. It is through this process, that more detailed consideration to the refinement of the options will be given, reflecting the emerging content of the District Plan and the choices made. Subsequent SA Reports will record these choices and the reasoning.

Doc Ref. 40764

Appendix A Appraisal of Employment Options



Low Growth Option: 1-30ha of Employment Land (Indicative Growth of ~5ha)

	Employment Land Growth Option 1: 1-30ha		
SA Objective	Score	Commentary	
1. Water, Soil and Air Quality. To protect and enhance the quality of water, soil and air.	+//?	Likely Significant Effects + Larger employment developments are more likely to be able to provide comprehensive approaches to water management and innovation in air quality management due to economies of scale and ability to plan strategically across a site. There is the potential for significant positive effects with larger developments. However, an indicative growth option of ~5ha within this range is likely to result in smaller scale developments with less economies of scale and therefore minor positive effects are identified. ? There are drinking water safeguard zones on the south eastern and south western sides of Bromsgrove town relating to surface water and groundwater. Bromsgrove town also sits over a Major Aquifer of high vulnerability. The north western portion of the District also lies in a Source Protection Zone (Zone III – total catchment). The designations indicate that water sources are vulnerable to effects and uncertainties are identified in relation to impacts on these resources until the precise location of development is known and in the absence of mitigation. - Urban extensions on the periphery of Bromsgrove town are likely to impact on soils, given the limited potential for the re-use of previously developed land and buildings on the edge of Bromsgrove town. The potential for negative effects associated with the loss of greenfield land is identified, although given the scale of development through this low growth option such effects are not likely to be significant. +/? There could be opportunity for the re-use of previously developed land and buildings, although the scale of this is uncertain subject to the precise location of development focussed on the periphery of Bromsgrove town could impact on existing air quality management areas, covering parts of the Redditch Road, Worcester Road and Lickey End. Birmingham and adjoining authorities have all declared local authority wide AQMAs. It is likely that new employment development would result in additional motorised transport in the Di	



	Employment Land Growth Option 1: 1-30ha		
SA Objective	Score	Commentary	
		The Local Plan to identify the need to safeguard aquifer and water quality.	
		Uncertainties	
		The precise location of development.	
		There is also uncertainty around the extent to which public transport may be used to access new employment development as this is in part dependent upon behavioural choices.	
		<u>Assumptions</u>	
		Whilst there would be opportunities to promote the use of public transport as part of new employment development, the reality of economic growth is an increase in car and HGV use. The associated emissions would have negative effects on air quality.	
		Likely Significant Effects	
		-/? Larger developments have greatest potential to impact on areas of greenfield land and Best and Most Versatile Agricultural Land. Although smaller developments could also impact cumulatively on these resources.	
2. Land Use . To ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.		-/? There are reserves of silica sand within the District that development under this option could potentially impact upon and a negative effect (with uncertainty) is identified.	
		+ The scale of development through this option (indicatively ~5ha of new employment land) would provide opportunities to re-use previously developed land and buildings. The re-use of such land could give rise to positive effects, although the scale of development and such effects is unlikely to be significant, noting however that the many of the available brownfield sites in the District have now been redeveloped.	
	+/-/?	-/? The potential for minor negative effects, in the absence of mitigation, is identified in relation to potential effects on soils associated with the development of greenfield land and is reflective of the lower scale of development through this option (indicatively ~5ha). Larger employment developments have greatest potential to impact on areas of greenfield land and Best and Most Versatile Agricultural Land, although smaller developments could also impact cumulatively on these resources. There are extensive areas of Grade 3 agricultural land in the District and the potential for a significant negative effect with uncertainty is identified as it is not known if the affected land would fall into Grade 3a or 3b. There are also areas of Grade 2 agricultural land in the District that could be affected.	
		Mitigation	
		Good design and landscaping for new employment development could help to mitigate any adverse effects associated with the loss of greenfield land.	

	Employment Land Growth Option 1: 1-30ha		
SA Objective	Score	Commentary	
3. Waste: To manage waste in accordance with the waste hierarchy: 1. Prevention 2. Preparing for reuse 3. Recycling 4. Other recovery 5. Disposal	-/?	Uncertainties The precise location of development would determine the extent of greenfield land which would be developed through this option and therefore the effects on land use. The precise location of development would also determine the extent to which brownfield land could be re-developed. Assumptions Through this low growth option, it is assumed that there would be some loss of greenfield land, although it is likely to be small in scale. It is assumed that as most of the available brownfield sites in the District have been redeveloped, the availability of suitable brownfield sites is limited. Likely Significant Effects -/? Appraised on the basis that all options will give rise to increased waste associated with an increase in employment development. A minor negative effect is identified associated with the development (indicatively) of ~5ha of new employment land with uncertainty in terms of the potential for intervention at the District and national levels. Mitigation None. Uncertainties The precise location of development. Assumptions It is assumed that all waste generated would be managed in accordance with the waste hierarchy.	
4. Flood Risk: To ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to all sources of flooding.	+/-	Likely Significant Effects Due to its location in the headwaters of catchments, the District is not prone to major river flooding. It is however crossed by an extensive network of watercourses which drain the Birmingham Plateau. These watercourses have a rapid response to rainfall during storm events and are prone to overtopping their banks, although in many cases this is due to blockages in the channel or problematic culverts. In addition, due to the rapid runoff experienced in the area, a number of events are attributable to surface or highway runoff or the flooding of the sewer network. Occurrences of sewer flooding (both foul and storm) have occurred in developed areas, including Bromsgrove town, Catshill and Marlbrook. There are no reports of groundwater flooding within the Bromsgrove District and Redditch Borough Strategic Flood Risk Assessment Level 1, Final Report (2009).	



		Employment Land Growth Option 1: 1-30ha
SA Objective	Score	Commentary
		Larger developments are more likely to provide opportunities for flood risk mitigation due to economies of scale and ability to plan strategically across a site. However, indicatively the development of ~5ha of employment land through this option is likely to result in development of a smaller scale with less opportunities for mitigating flood risk which would reduce the extent of any positive effects.
		Significant green infrastructure development could have a positive effect on this objective by increasing infiltration and storm water retention times by providing space for flood waters to flow through and additional areas for temporary flood water storage. However, this low growth option would see the development indicatively of ~5ha and so the opportunities for green infrastructure development would be more limited.
		Within Bromsgrove town there are areas at risk of surface water flooding, from very low to high risk. Surface water flooding is also evident on the edges of Bromsgrove town. Flood risk from rivers is also present in Bromsgrove town and on the edges. The areas at risk of flooding are not extensive.
		It should be possible to incorporate SuDS within developments and avoid areas of high flood risk by applying the sequential test at the site level.
		+/- A mixed score of minor positive (associated with opportunities to incorporate SuDS in new development) and minor negative (associated with the potential for development in and around Bromsgrove town and in other areas of the District to exacerbate the risk of flooding) is identified.
		<u>Mitigation</u>
		New development to incorporate sustainable urban drainage where feasible. <u>Uncertainties</u>
		The precise location of development. Assumptions
		It is assumed that any new employment development would not be allocated to areas at greatest risk of flooding and that the sequential test would be used for any sites at risk of flooding.
		Development would need to manage surface water run-off rates in accordance with relevant guidance.
		Likely Significant Effects
5. Climate Change: To reduce the causes of and adapt to the impacts of climate change.	+/-	Larger developments are more likely to provide opportunities for renewable energy schemes due to economies of scale and ability to plan strategically across a site. Larger developments are more likely to provide greater opportunities for Green Infrastructure to help adapt to the effects of climate change due to economies of scale and ability to plan strategically across a site. However, the low growth option would see (indicatively) ~5ha of new employment land developed and this scale of development would reduce the opportunities for renewable energy schemes and green infrastructure provision.

		Employment Land Growth Option 1: 1-30ha
SA Objective	Score	Commentary
		+/-Although the town of Bromsgrove and larger settlements are in relatively sustainable locations for development there would inevitably be an increase in greenhouse gas emissions related to an increase in transport associated with new employment development. The low growth option would see (indicatively) ~5ha of new employment land developed. Development at this scale would offer greater opportunities to ensure such development was in sustainable locations and thereby helping to reduce the need to travel. There could however still be development in unsustainable locations which would increase car and HGV use and associated emissions. A mixture of minor positive and negative effects is identified.
		Mitigation The Level Discount of the second of the line of the level
		The Local Plan could promote the use of public transport. Uncertainties
		The precise location of development.
		There is also uncertainty around the extent to which public transport may be used to access new employment development as this is in part dependent upon behavioural choices.
		<u>Assumptions</u>
		Whilst there would be opportunities to promote the use of public transport through this option, the reality of economic growth is an increase in car and HGV use, which would have a negative effect on this objective. However, indicatively development of 5ha of employment land would limit the extent of additional vehicle use and the associated emissions.
6. Biodiversity . To conserve and enhance biodiversity and geodiversity and promote improvements to the green infrastructure network.	+/-/?	2. There are no European designated sites in Bromsgrove District itself although the European designated Lyppard Grange Ponds SAC and Fen Pools SAC are within 15km of the administrative boundary. At this stage effects on European sites are uncertain. A Habitats Regulations Assessment of the District Plan will be undertaken. - The District contains 13 Sites of Special Scientific Interest (SSSIs) (three of which are for geological importance). Chaddersley Wood National Nature Reserve is: an Ancient Woodland; a Local Wildlife Site (LWS); a National Nature Reserve (NNR) and a SSSI. Other nature reserves in the District include Upton Warren, which is Worcestershire's premier bird-watching reserve (it attracts birds throughout the year) and Hanbury Woods. Development in proximity to such areas could give rise to significant negative effects. However, the relatively low scale of development (indicatively ~5ha) through this option would reduce the extent of potential impacts and so minor negative effects are identified.

	Employment Land Growth Option 1: 1-30ha		
SA Objective	Score	Commentary	
		- In addition to the statutorily recognised SSSIs, there are 90 Local (Wildlife) Sites (five of which are recognised for geological value). Development adjacent to such sites could give rise to minor negative effects.	
		+ Development does also provide the opportunity to secure a net gain in biodiversity so the potential for positive effects is also identified, although through the development (indicatively) of ~5ha of new employment land any net gains and positive effects are not likely to be significant.	
		? There are significant uncertainties in relation to the scoring for this option. The precise location of any employment land development through this option would fully determine the biodiversity effects from any development. However, development indicatively of ~5ha of employment land through this option would (given the relatively small scale of development) offer opportunities to locate development away from important biodiversity sites.	
		<u>Mitigation</u>	
		Local Plan to require development sites to achieve a net gain in biodiversity where possible. Uncertainties	
		The precise location of development. Assumptions	
		None. Likely Significant Effects	
		The Worcestershire County Council Landscape Character Assessment identifies 10 different landscape character types within the District (excluding urban): Estate Farmlands, Principal Settled Farmlands, Principal Timbered Farmlands, Principal Wooded Hills, Sandstone Estatelands, Settled Farmlands with Pastoral Land Use, Timbered Pastures, Timbered Plateau Farmlands, Wooded Estatelands and Wooded Hills and Farmlands.	
7. Landscape: To conserve and enhance landscape character and townscape.	-/?	-/? Given the character of the existing landscape, it is considered that there is potential for negative effects in relation to landscape associated with any employment development. However, the precise location and scale of development would fully determine the landscape effects of this growth option. The scale of development through this option (indicatively ~5ha) would result in some loss of greenfield land but it is not likely to be significant.	
		<u>Mitigation</u>	
		Good design and landscaping for individual developments could help to mitigate any adverse landscape effects. <u>Uncertainties</u>	
		The precise location of development.	



		Employment Land Growth Option 1: 1-30ha	
SA Objective	Score	Commentary	
		Assumptions It is assumed that there would be some loss of greenfield land through the development (indicatively) of ~5ha of employment land.	
8. Cultural Heritage: To conserve and enhance the historic environment, cultural heritage, character and setting.	?	Likely Significant Effects ? The District has 469 Listed Buildings, 839 known sites of Archaeology Interest (13 of which are Scheduled Monuments), 12 Conservation Areas designated as being areas of special architectural or historic interest and 2 registered parks and gardens (Hagley Park and Hewell Grange) and also a number of other historic parks of regional importance. Given the above factors an uncertain score is identified in relation to potential effects on built heritage as the precise location of any new employment development would determine the effects on heritage. With the relatively small scale of development proposed through this low growth option (indicatively ~5ha) there would be opportunities to avoid development in areas which may have negative effects on heritage, and there may be limited opportunities to enhance heritage. Mitigation Good design could help to mitigate any adverse effects on cultural heritage. The Local Plan could promote the sensitive re-use of listed buildings. Uncertainties The precise location of development. Assumptions None.	
9. Health and well-being . To improve the health and well-being of the population and reduce inequalities in health.	+/-	Likely Significant Effects Larger developments provide the critical mass to support new health facilities, but the location and scale of provision is partly dependent on the delivery model preferred by health providers. Smaller scale development provides the opportunity to support existing facilities. The low growth scenario would see the development (indicatively) of ~5ha of employment land. This relatively small scale of development would be unlikely to generate the need for new health facilities, although it would help to support existing facilities which would have a minor positive effect on this objective. This scale of growth would help to raise wealth levels and living standards with associated positive health effects, although with low growth this is unlikely to be significant.	

		Employment Land Growth Option 1: 1-30ha		
SA Objective	Score	Commentary		
		The reality of economic growth is an increase in car and HGV use and associated emissions which would have negative health effects (the links between air quality and poor health are wide ranging and well known). The scale of emissions and associated health effects from the development (indicatively) of ~5ha of employment land would not be likely to be significant. Mitigation The Local Plan could promote the use of public transport. Uncertainties Uncertainties around the precise location of development at this stage and re-organisation of the NHS Trust's estate. Assumptions		
10. Community Participation . To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community.	0	Likely Significant Effects 0 Performance against this objective is considered to be neutral across all options as the community will have the opportunity to participate in decisions through the local plan process, preparation of neighbourhood developments plans (where relevant) and through participation in planning applications that affect them. Mitigation None. Uncertainties The precise location of development. Assumptions None.		
11. Housing . To provide decent affordable housing for all, of the right quality and tenure and for local needs, in a clean, safe and pleasant local environment.	~	Likely Significant Effects ~ There is no direct relationship between this option and this objective. However, the development of (indicatively) ~5ha of new employment land would help to raise income levels in the District and in turn increase opportunities for home ownership.		





		Employment Land Growth Option 1: 1-30ha
SA Objective	Score	Commentary
		Mitigation None. Uncertainties The precise location of development. Assumptions None.
12. Town Centre Vitality and Community Facilities and Services. To improve the vitality and viability of Town Centres, other centres and communities and the quality of, and equitable access to, local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment.	+/?	Likely Significant Effects +/? Through the development (indicatively) of ~5ha of new employment land there would be opportunities to direct this development to Bromsgrove town and larger settlements in the District, which would potentially help to maintain the vitality and viability of these centres. Development at these locations would have positive effects against this objective, though the extent of positive effects from the development of (indicatively) ~5ha of new employment land may not be significant. Uncertainties are also identified because this growth option could result in new employment development in relatively isolated locations with reliance on the car (although the scale of any development in such isolated locations would be likely to be low through this low growth option). This could create difficulties for some members of the community to access services and facilities or be helped by service providers. Mitigation None. Uncertainties The precise location of development. Assumptions None.





	Employment Land Growth Option 1: 1-30ha	
SA Objective	Score	Commentary
13. Economy . To develop a knowledge driven economy which supports the development of new technologies of high value, accompanied by supporting the infrastructure, whilst ensuring all share the benefits, whether urban and rural.	+/?	Likely Significant Effects This growth option would see the development (indicatively) of ~5ha of new employment land. This would help to provide new employment opportunities and support wider economic growth in the District, although at this scale of development the extent of positive effects may not be significant. It is also uncertain whether this low level of growth would provide sufficient land to meet future needs and attract inward investment. +/? The potential for positive effects is identified as locations near the larger settlements with good transport links would provide a sustainable location for such employment development, however the location of developments at this stage is uncertain. Mitigation None. Uncertainties The precise location of development. Assumptions None.
14. Education . To raise the skill levels and qualifications of the workforce and the quality of education for all.	+/?	Likely Significant Effects Access to jobs and training is more likely for employment development adjacent/accessible to existing urban areas and Bromsgrove town is the largest employer in the District. Larger scale employment development could create greater opportunities for skills development and training, subject to the type of employment uses developed. However, there is likely to be reduced scale opportunities through this low-level growth scenario as smaller development sites would be more likely in order to ensure development in a range of locations. Larger scale employment development could create demand for new education facilities to meet additional needs. Smaller developments are more likely to make off-site contributions towards such facilities, so proximity to existing facilities with capacity or potential for expansion becomes more important.

	Employment Land Growth Option 1: 1-30ha		
SA Objective	Score	Commentary	
		The Infrastructure Delivery Plan for the existing Local Plan envisages that existing schools will be expanded to meet planned growth. The extent to which future growth can be accommodated in this manner will need to be explored.	
		+/? The potential for positive effects with some uncertainty is identified as the development (indicatively) of ~5ha of new employment land may generate demand for new education facilities although the extent of this is uncertain.	
		<u>Mitigation</u>	
		None. <u>Uncertainties</u>	
		The precise location of development. Assumptions	
		None.	
15. Travel . To increase sustainable travel choices and move towards more sustainable travel patterns.	+/-/7	Likely Significant Effects Bromsgrove District is well served by the national road network, with two major motorways passing through the District (M42 and M5), several major A-roads (A38, A435, A441, A456 and A491) and an extensive rural road network linking the main urban areas in the District with rural villages. There are hourly bus services via Bromsgrove town to Birmingham, Worcester, Kidderminster, Redditch and Stourbridge. Rural areas of the District are served by less frequent bus services which have limited hours of operation. The District is reasonably well served by the rail network, with Bromsgrove train station offering regular services to Birmingham New Street, Great Malvern, Hereford and Worcester Shrub Hill. The Cross City Line, which opened in 2018 provides more services per hour between Bromsgrove and central Birmingham, including stations in between such as Longbridge, Selly Oak/University and Five Ways. Other rail stations that provide a service to urban centres in adjacent local authorities such as Birmingham, Kidderminster and Redditch are situated at Barnt Green, Alvechurch, Wythall and Hagley. There are direct train services between Barnt Green and Alvechurch and Barnt Green and Bromsgrove town.	
		+/-/? There would be opportunities through the development of (indicatively) ~5ha of new employment land to locate such development in sustainable locations accessible by public transport which would have a positive effect on this objective. However, the reality of economic growth is an increase in car and HGV use which would have negative effects on this objective. There is also uncertainty as there is the potential for development to be located in more isolated parts of the District where there is greater reliance on the car, although the scale of any such isolated development would be likely to be smaller through this option.	



wood.

	Employment Land Growth Option 1: 1-30ha	
SA Objective	Score	Commentary
		<u>Mitigation</u>
		The Local Plan could promote the use of public transport. Uncertainties
		The precise location of development.
		There is also uncertainty around the extent to which public transport may be used to access new employment development as this is in part dependent upon behavioural choices.
		<u>Assumptions</u>
		None.





Medium Growth Option: 31-60ha of Employment Land (Indicative Growth of ~45ha)

	Employment Land Growth Option 2: 31-60ha		
SA Objective	Score	Commentary	
1. Water, Soil and Air Quality. To protect and enhance the quality of water, soil and air.	+//?	Likely Significant Effects + Larger employment developments are more likely to be able to provide comprehensive approaches to water management and innovation in air quality management due to economies of scale and ability to plan strategically across a site. There is the potential for significant positive effects with larger developments. It is likely that there would be the requirement for some large development sites associated with the delivery of (indicatively) ~45ha of new employment land, as well as a number of smaller sites where positive effects would be unlikely to be significant with less economies of scale. ? There are drinking water safeguard zones on the south eastern and south western sides of Bromsgrove town relating to surface water and groundwater. Bromsgrove town also sits over a Major Aquifer of high vulnerability. The north western portion of the District also lies in a Source Protection Zone (Zone III = total catchment). The designations indicate that water sources are vulnerable to effects and uncertainties are identified in relation to impacts on these resources until the precise location of development is known and in the absence of mitigation. Any urban extensions on the periphery of Bromsgrove are likely to impact on soils, given the limited potential for the re-use of previously developed land and buildings on the edge of Bromsgrove town. The potential for negative effects associated with the loss of greenfield land is identified. +/? There could be opportunity for the re-use of previously developed land and buildings, although the scale of this is uncertain subject to the precise location of development, so the potential for positive effects is identified, depending on the scale of this ourcertain subject to the precise location of development, so the potential for positive effects is identified, depending on the scale of the opportunities. Additional employment development focussed on Bromsgrove town could impact on existing air quality management areas, covering parts	





	Employment Land Growth Option 2: 31-60ha	
SA Objective	Score	Commentary
		Uncertainties The precise location of development. There is also uncertainty around the extent to which public transport may be used to access new employment development as this is in part dependent upon behavioural choices Assumptions Whilst there would be opportunities to promote the use of public transport as part of new employment development, the reality of economic growth is an increase in car and HGV use. The associated emissions would have negative effects on air quality which could be significant through the development (indicatively) of ~45ha of new employment land.
2. Land Use. To ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+//?	Likely Significant Effects /? There are reserves of silica sand within the District that development under this option could potentially impact upon and a significant negative effect (with uncertainty) is identified, subject to the precise location of development. + The scale of development through this option (indicatively ~45ha of new employment land) would provide greater opportunities to re-use previously developed land and buildings. The re-use of such land could give rise to positive effects depending on the scale of development, noting however that many of the available brownfield sites in the District have now been redeveloped and so suitable and available sites may be limited. The potential for significant negative effects, in the absence of mitigation, is identified in relation to potential effects on soils associated with the development of greenfield land. There would likely be the need for development of larger sites through the development (indicatively) of ~45ha of new employment land. Larger developments have greatest potential to impact on areas of greenfield land and Best and Most Versatile Agricultural Land, although smaller developments could also impact cumulatively on these resources. There are extensive areas of Grade 3 agricultural land in the District and the potential for a significant negative effect with uncertainty is identified as it is not known if the affected land would fall into Grade 3a or 3b. There are also areas of Grade 2 agricultural land in the District that could be affected by new employment development, subject to location. Mitigation Good design and landscaping for new employment development could help to mitigate any adverse effects associated with the loss of greenfield land. Uncertainties The precise location of development would determine the extent of greenfield land which would be developed through this option and therefore the effects on land use. The precise location of development would also determine the extent to which brownfield land could be r





	Employment Land Growth Option 2: 31-60ha		
SA Objective	Score	Commentary	
		Assumptions	
		It is assumed that this option would include some employment land sites of substantial size and therefore that the extent of greenfield land that would need to be allocated would increase. It is assumed that as most of the available brownfield sites in the District have been redeveloped, the availability of suitable brownfield sites is limited.	
		Likely Significant Effects	
Waste: To manage waste in accordance with		/? Whilst all options will give rise to increased waste associated with an increase in employment development, the extent of waste generation would significantly increase with this option through (indicatively) the development of ~45ha of employment land. A significant negative effect is identified with uncertainty in terms of the potential for intervention at the District and national levels.	
the waste hierarchy: 1. Prevention		<u>Mitigation</u>	
Preparing for reuse	/?	None.	
3. Recycling4. Other recovery		<u>Uncertainties</u>	
5. Disposal		The precise location of development.	
		<u>Assumptions</u>	
		It is assumed that all waste generated would be managed in accordance with the waste hierarchy.	
		Likely Significant Effects	
4. Flood Risk: To ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to all sources of flooding.	++/	Due to its location in the headwaters of catchments, the District is not prone to major river flooding. It is however crossed by an extensive network of watercourses which drain the Birmingham Plateau. These watercourses have a rapid response to rainfall during storm events and are prone to overtopping their banks, although in many cases this is due to blockages in the channel or problematic culverts. In addition, due to the rapid runoff experienced in the area, a number of events are attributable to surface or highway runoff or the flooding of the sewer network. Occurrences of sewer flooding (both foul and storm) have occurred in developed areas, including Bromsgrove town, Catshill and Marlbrook. There are no reports of groundwater flooding within the Bromsgrove District and Redditch Borough Strategic Flood Risk Assessment Level 1, Final Report (2009).	
		Larger developments are more likely to provide opportunities for flood risk mitigation due to economies of scale and ability to plan strategically across a site. Development of (indicatively) ~45ha of new employment land through the medium growth scenario would provide opportunities for large sites development with associated positive effects in relation to flood mitigation.	
		Significant green infrastructure development could have a positive effect on this objective by increasing infiltration and storm water retention times by providing space for flood waters to flow through and additional areas for temporary flood water storage. There could be opportunities for significant green infrastructure provision through the development of (indicatively) ~45ha of employment land	





	Employment Land Growth Option 2: 31-60ha	
SA Objective	Score	Commentary
		Within Bromsgrove town there are areas at risk of surface water flooding, from very low to high risk. Surface water flooding is also evident on the edges of Bromsgrove town. Flood risk from rivers is also present in Bromsgrove town and on the edges. The areas at risk of flooding are not extensive. It should be possible to incorporate SuDS within developments and avoid areas of high flood risk by applying the sequential test at the site level. ++/ A mixed score of significant positive (associated with opportunities to incorporate SuDS in new development, which should be significant given the (indicative) scale of development of ~45ha) and significant negative (associated with the potential for development in and around Bromsgrove town and in other areas of the District to exacerbate the risk of flooding) effects is identified.
		Mitigation New development to incorporate sustainable urban drainage where feasible. Uncertainties The precise location of development. Assumptions It is assumed that any new employment development would not be allocated to areas at greatest risk of flooding and that the sequential test would be used for any sites at risk of flooding. Development would need to manage surface water run-off rates in accordance with relevant guidance.
5. Climate Change: To reduce the causes of and adapt to the impacts of climate change.	++/	Likely Significant Effects Larger developments are more likely to provide opportunities for renewable energy schemes due to economies of scale and ability to plan strategically across a site. Larger developments are more likely to provide greater opportunities for Green Infrastructure to help adapt to the effects of climate change due to economies of scale and ability to plan strategically across a site. The medium growth option would see (indicatively) ~45ha of new employment land developed and this scale of development would provide opportunities for renewable energy schemes and green infrastructure development which would help to mitigate the adverse effects of climate change. ++/Although the town of Bromsgrove and larger settlements are in relatively sustainable locations for development there would inevitably be an increase in greenhouse gas emissions related to an increase in transport associated with employment development and economic growth. The medium growth scenario would see (indicatively) ~45ha of new employment land developed. Development at this scale would offer opportunities to ensure such development was in sustainable locations and thereby helping to reduce the need to travel, although there may still be development in unsustainable locations which would increase car and HGV use and associated emissions. A mixture of significant positive and negative effects on this objective are identified. Mitigation





		Employment Land Growth Option 2: 31-60ha
SA Objective	Score	Commentary
		The Local Plan could promote the use of public transport, sustainable design and the use of low carbon energy to promote climate resilience and adaptation.
		<u>Uncertainties</u>
		The precise location of development.
		There is also uncertainty around the extent to which public transport may be used to access new employment development as this is in part dependent upon behavioural choices.
		<u>Assumptions</u>
		Whilst there would be opportunities to promote the use of public transport through this option, the reality of economic growth is an increase in car and HGV use.
		Likely Significant Effects
		? There are no European designated sites in Bromsgrove District itself although the European designated Lyppard Grange Ponds SAC and Fen Pools SAC are within 15km of the administrative boundary. At this stage effects on European sites are uncertain. A Habitats Regulations Assessment of the District Plan will be undertaken.
6. Biodiversity. To		/? The District contains 13 Sites of Special Scientific Interest (SSSIs) (three of which are for geological importance). Chaddersley Wood National Nature Reserve is: an Ancient Woodland; a Local Wildlife Site (LWS); a National Nature Reserve (NNR) and a SSSI. Other nature reserves in the District include Upton Warren, which is Worcestershire's premier bird-watching reserve (it attracts birds throughout the year) and Hanbury Woods. Development in proximity to such areas could give rise to significant negative effects.
conserve and enhance biodiversity and geodiversity and promote	++//-?	- In addition to the statutorily recognised SSSIs, there are 90 Local (Wildlife) Sites (five of which are recognised for geological value). Development adjacent to such sites could give rise to minor negative effects.
improvements to the green infrastructure network.		++ Development does also provide the opportunity to secure a net gain in biodiversity so the potential for positive effects is also identified, which could be significant through the development (indicatively) of ~45ha of new employment land.
		? There are significant uncertainties in relation to the scoring for this option. The precise location of any employment land development through this option would fully determine the biodiversity effects from any development.
		<u>Mitigation</u>
		Local Plan to require development sites to achieve a net gain in biodiversity where possible. <u>Uncertainties</u>
		The precise location of development.





		Employment Land Growth Option 2: 31-60ha
SA Objective	Score	Commentary
		Assumptions
		None.
		<u>Likely Significant Effects</u>
		The Worcestershire County Council Landscape Character Assessment identifies 10 different landscape character types within the District (excluding urban): Estate Farmlands, Principal Settled Farmlands, Principal Timbered Farmlands, Principal Wooded Hills, Sandstone Estatelands, Settled Farmlands with Pastoral Land Use, Timbered Pastures, Timbered Plateau Farmlands, Wooded Estatelands and Wooded Hills and Farmlands.
7. Landscape: To conserve and enhance landscape character and townscape.	ş	/? Given the character of the existing landscape it is considered that there is potential for significant negative effects in relation to landscape associated with any employment development. However, the precise location and scale of development would fully determine the landscape effects of this growth option. The scale of development through this option (indicatively ~45ha) would result in loss of greenfield land, which could be significant. In addition, larger developments are likely to have disproportionately greater landscape impacts as a result of the scale and massing of buildings which are more difficult to mitigate.
		Mitigation
		Good design and landscaping would help to mitigate the loss of greenfield land. <u>Uncertainties</u>
		The precise location of development.
		<u>Assumptions</u>
		It is assumed that there would be loss of greenfield land through the development (indicatively) of ~45ha of employment land.
		<u>Likely Significant Effects</u>
8. Cultural Heritage: To		? The District has 469 Listed Buildings, 839 known sites of Archaeology Interest (13 of which are Scheduled Monuments), 12 Conservation Areas designated as being areas of special architectural or historic interest and 2 registered parks and gardens (Hagley Park and Hewell Grange) and also a number of other historic parks of regional importance.
conserve and enhance the historic environment, cultural heritage, character and setting.	?	Given the above factors an uncertain score is identified in relation to potential effects on built heritage as the precise location of any new employment development would fully determine effects on heritage. With the scale of development proposed through this medium growth option (indicatively ~45ha) it may be difficult to avoid development in areas which may have negative effects on heritage, however there may be opportunities to enhance heritage, which could be significant.
		Mitigation
		Good design could help to mitigate any adverse effects on cultural heritage.





	Employment Land Growth Option 2: 31-60ha		
SA Objective	Score	Commentary	
		The Local Plan could promote the sensitive re-use of listed buildings. Uncertainties The precise location of development. Assumptions None.	
9. Health and well-being . To improve the health and well-being of the population and reduce inequalities in health.	+/-	Likely Significant Effects Larger developments provide the critical mass to support new health facilities, but the location and scale of provision is partly dependent on the delivery model preferred by health providers. Smaller scale development provides the opportunity to support existing facilities. + The medium growth scenario would see the development (indicatively) of ~45ha of employment land. This scale of development could generate the need for new health facilities and would be likely to help to support existing facilities which would have a minor positive effect on this objective. This scale of growth would help to raise wealth levels and living standards with associated positive health effects. - The reality of economic growth is an increase in car and HGV use and associated emissions which would have negative health effects (the links between air quality and poor health are wide ranging and well known). Mitigation The Local Plan could promote the use of public transport. Uncertainties Uncertainties around the precise location of development at this stage and re-organisation of the NHS Trust's estate. Assumptions None.	
10. Community Participation. To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social	0	Likely Significant Effects 0 Performance against this objective is considered to be neutral across all options as the community will have the opportunity to participate in decisions through the local plan process, preparation of neighbourhood developments plans (where relevant) and through participation in planning applications that affect them. Mitigation None.	





		Employment Land Growth Option 2: 31-60ha	
SA Objective	Score	Commentary	
responsibility in the local community.		Uncertainties The precise location of development. Assumptions None.	
11. Housing . To provide decent affordable housing for all, of the right quality and tenure and for local needs, in a clean, safe and pleasant local environment.	~	Likely Significant Effects ~ There is no direct relationship between this option and this objective. However, the development (indicatively) of ~45ha of new employment land would help to raise income levels in the District and in turn increase opportunities for home ownership. This could be significant from this scale of development. Mitigation None. Uncertainties None. Assumptions None	
12. Town Centre Vitality and Community Facilities and Services. To improve the vitality and viability of Town Centres, other centres and communities and the quality of, and equitable access to, local services and facilities regardless of age, gender, ethnicity, disability, socioeconomic status or educational attainment.	++/?	Likely Significant Effects ++/? Through the development (indicatively) of ~45ha of new employment land there would be opportunities to direct this development to Bromsgrove town and larger settlements in the District, which would potentially help to maintain the vitality and viability of these centres. Development at these locations would have positive effects against this objective, which could be significant given the scale of development. Uncertainties are also identified because this growth option could result in new employment development in relatively isolated locations with reliance on the car. This could create difficulties for some members of the community to access services and facilities or be helped by service providers. Mitigation None. Uncertainties The precise location of development.	





	Employment Land Growth Option 2: 31-60ha	
SA Objective	Score	Commentary
		Assumptions
		None.
		<u>Likely Significant Effects</u>
13. Economy . To develop		This growth option would see (indicatively) the development of ~45ha of new employment land. This would help to provide new employment opportunities and support wider economic growth in the District, which would be likely to be significant at this scale of development.
a knowledge driven economy which supports the development of new		++/? The potential for significant positive effects is identified as locations near the larger settlements with good transport links would provide a sustainable location for such employment development, however the precise location of development at this stage is uncertain.
technologies of high value, accompanied by	++/?	<u>Mitigation</u>
supporting the infrastructure, whilst		None.
ensuring all share the benefits, whether urban		<u>Uncertainties</u>
and rural.		The precise location of development.
		<u>Assumptions</u>
		None.
		Likely Significant Effects
		Access to jobs and training is more likely for employment development adjacent/accessible to existing urban areas and Bromsgrove town is the largest employer in the District.
14. Education . To raise the skill levels and		Larger scale employment development could create greater opportunities for skills development and training, subject to the type of employment uses developed. The level of growth through this option would be likely to result in the development of larger sites so it is likely that there would be some opportunities for skills and training development.
qualifications of the workforce and the quality of education for all.	++/?	Larger scale employment development could create demand for new education facilities to meet additional needs. Smaller developments are more likely to make off-site contributions towards such facilities, so proximity to existing facilities with capacity or potential for expansion becomes more important.
		The Infrastructure Delivery Plan for the existing Local Plan envisages that existing schools will be expanded to meet planned growth. The extent to which future growth can be accommodated in this manner will need to be explored.
		++/? The potential for significant positive effects with some uncertainty is identified as the development (indicatively) of ~45ha of new employment land may generate demand for new education facilities although the extent of this is uncertain.



		Employment Land Growth Option 2: 31-60ha
SA Objective	Score	Commentary
		Mitigation
		None.
		<u>Uncertainties</u>
		The precise location of development. Assumptions
		None. <u>Likely Significant Effects</u>
		Bromsgrove District is well served by the national road network, with two major motorways passing through the District (M42 and M5), several major A-roads (A38, A435, A441, A456 and A491) and an extensive rural road network linking the main urban areas in the District with rural villages. There are hourly bus services via Bromsgrove town to Birmingham, Worcester, Kidderminster, Redditch and Stourbridge.
	++//?	Rural areas of the District are served by less frequent bus services which have limited hours of operation.
15. Travel . To increase sustainable travel choices and move towards more		The District is reasonably well served by the rail network, with Bromsgrove train station offering regular services to Birmingham New Street, Great Malvern, Hereford and Worcester Shrub Hill. The Cross City Line, which opened in 2018 provides more services per hour between Bromsgrove and central Birmingham, including stations in between such as Longbridge, Selly Oak/University and Five Ways. Other rail stations that provide a service to urban centres in adjacent local authorities such as Birmingham, Kidderminster and Redditch are situated at Barnt Green, Alvechurch, Wythall and Hagley. There are direct train services between Barnt Green and Alvechurch and Barnt Green and Bromsgrove town.
sustainable travel patterns.		++//? There would be opportunities through the development of (indicatively) ~45ha of new employment land to locate such employment development in sustainable locations accessible by public transport. However, the reality of economic growth is an increase in car and HGV use which would have negative effects on this objective. There is also uncertainty as there is the potential for development to be located in more isolated parts of the District where there is greater reliance on the car, which could be significant with the scale of development. Significant positive and negative effects are identified, with some uncertainty.
		<u>Mitigation</u>
		The Local Plan could promote the use of public transport and Local Plan to require the preparation of site based Travel Plans. <u>Uncertainties</u>
		The precise location of development.



wood.

	Employment Land Growth Option 2: 31-60ha	
SA Objective	Score	Commentary
		Assumptions
		None.



High Growth Option 61-90ha (Indicative growth of ~90ha)

		Employment Land Growth Option 3: 61-90ha
SA Objective	Score	Commentary
1. Water, Soil and Air Quality. To protect and enhance the quality of water, soil and air.	+/++//?	Likely Significant Effects ++ Larger employment developments are more likely to be able to provide comprehensive approaches to water management and innovation in air quality management due to economies of scale and ability to plan strategically across a site. There is the potential for significant positive effects with larger developments. It is likely that there would be the requirement for a number of large development sites associated with the delivery of (indicatively) ~90ha of new employment land. ? There are drinking water safeguard zones on the south eastern and south western sides of Bromsgrove town relating to surface water and groundwater. Bromsgrove town also sits over a Major Aquifier of high vulnerability. The north western portion of the District also lies in a Source Protection Zone (Zone III – total catchment). The designations indicate that water sources are vulnerable to effects and uncertainties are identified in relation to impacts on these resources until the precise location of development is known and in the absence of mitigation. Any urban extensions associated with new employment development located on the periphery of Bromsgrove are likely to impact on soils, given the limited potential for the re-use of previously developed land and buildings on the edge of Bromsgrove town. The potential for significant negative effects associated with the loss of greenfield land is identified (development of this scale would likely require significant greenfield land take). +/? There could be opportunity for the re-use of previously developed land and buildings, although the scale of this is uncertain subject to the precise location of development, so the potential for positive effects is identified, depending on the scale of this is uncertain subject to the precise location of development focused on Bromsgrove town could impact on existing air quality management areas, covering parts of the Redditch Road, Worcester Road and Lickey End. Birmingham and adjoining authorities have all declared lo





	Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary
		Assumptions Whilst there would be opportunities to promote the use of public transport as part of new employment development, the reality of economic
		growth is an increase in car and HGV use. The associated emissions would have negative effects on air quality which could be significant through the development (indicatively) of ~90ha of new employment land.
		Likely Significant Effects
		/? There are reserves of silica sand within the District that development under this option could potentially impact upon and a significant negative effect (with uncertainty) is identified, subject to the precise location of development.
	+/++//?	+/++ The scale of development through this option (indicatively ~90ha of new employment land) would provide greater opportunities to re-use previously developed land and buildings. The re-use of such land could give rise to positive and significant positive effects depending on the scale of development, noting however that many of the available brownfield sites in the District have now been redeveloped and so suitable and available sites may be limited.
2. Land Use . To ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, maximising of previously		The potential for significant negative effects, in the absence of mitigation, is identified in relation to potential effects on agriculture associated with the development of greenfield land. Through the development (indicatively) of ~90ha of new employment land it is likely that this would require some sites of substantial size and therefore the extent of greenfield land take would likely be significant. Larger developments have greatest potential to impact on areas of greenfield land and Best and Most Versatile Agricultural Land. Although smaller developments could also impact cumulatively on these resources. There are extensive areas of Grade 3 agricultural land in the District and the potential for a significant negative effect with uncertainty is identified as it is not known if the affected land would fall into Grade 3a or 3b. There are also areas of Grade 2 agricultural land in the District that could be affected by new employment development, subject to location.
developed land and reuse of vacant buildings where		<u>Mitigation</u>
this is not detrimental to open space and biodiversity interest.		Good design and landscaping for new employment development could help to mitigate any adverse effects associated with the loss of greenfield land.
		<u>Uncertainties</u>
		The precise location of development would determine the extent of greenfield land which would be developed through this option and therefore the effects on land use. The precise location of development would also determine the extent to which brownfield land could be re-developed for employment uses.
		Assumptions
		This high growth option would see indicatively ~90ha of employment land development. This scale of development would be likely to require the development of sites of a substantial size, and that as a consequence the amount of greenfield land developed would increase. It is assumed that as most of the available brownfield sites in the District have been redeveloped, the availability of suitable brownfield sites is limited.





		Employment Land Growth Option 3: 61-90ha
SA Objective	Score	Commentary
3. Waste: To manage waste in accordance with the waste hierarchy: 1. Prevention 2. Preparing for reuse 3. Recycling 4. Other recovery 5. Disposal	73	Likely Significant Effects /? Appraised on the basis that all options will give rise to increased waste associated with an increase in employment development, although the extent of waste generation would significantly increase with this option though (indicatively) the development of ~90ha of employment land. A significant negative effect is identified with uncertainty in terms of the potential for intervention at the District and national levels. Mitigation None. Uncertainties The precise location of development. Assumptions It is assumed that all waste generated would be managed in accordance with the waste hierarchy.
4. Flood Risk: To ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to all sources of flooding.	++/	Likely Significant Effects Due to its location in the headwaters of catchments, the District is not prone to major river flooding. It is however crossed by an extensive network of watercourses which drain the Birmingham Plateau. These watercourses have a rapid response to rainfall during storm events and are prone to overtopping their banks, although in many cases this is attributable to blockages in the channel or problematic culverts. In addition, due to the rapid runoff experienced in the area, a number of events are attributable to surface or highway runoff or the flooding of the sewer network. Occurrences of sewer flooding (both foul and storm) have occurred in developed areas, including Bromsgrove town, Catshill and Marlbrook. There are no reports of groundwater flooding within the Bromsgrove District and Redditch Borough Strategic Flood Risk Assessment Level 1, Final Report (2009). Larger developments are more likely to provide opportunities for flood risk mitigation due to economies of scale and ability to plan strategically across a site. Development of (indicatively) ~90ha of new employment land through the high growth scenario would provide opportunities for large sites development with associated positive effects in relation to Significant green infrastructure development could have a positive effect on this objective by increasing infiltration and storm water retention times by providing space for flood waters to flow through and additional areas for temporary flood water storage. The high growth option would see the development (indicatively) of ~90ha of new employment land and so the opportunities for green infrastructure development would be significant. Within Bromsgrove town there are areas at risk of surface water flooding, from very low to high risk. Surface water flooding is also evident on the edges of Bromsgrove town. Flood risk from rivers is also present in Bromsgrove town and on the edges. The areas at risk of flooding are not extensive.



	Employment Land Growth Option 3: 61-90ha		
SA Objective	Score	Commentary	
		It should be possible to incorporate SuDS within developments and avoid areas of high flood risk by applying the sequential test at the site level.	
		++/ A mixed score of significant positive (associated with opportunities to incorporate SuDS in new development, which should be significant given the scale of development of (indicatively) ~90ha) and significant negative (associated with the potential for development in and around Bromsgrove town and in other areas of the District to exacerbate the risk of flooding) effects is identified.	
		<u>Mitigation</u>	
		New development to incorporate sustainable urban drainage where feasible. <u>Uncertainties</u>	
		The precise location of development. Assumptions	
		It is assumed that any new employment development would not be allocated to areas at greatest risk of flooding and that the sequential test would be used for any sites at risk of flooding.	
		Development would need to manage surface water run-off rates in accordance with relevant guidance.	
		<u>Likely Significant Effects</u>	
		Larger developments are more likely to provide opportunities for renewable energy schemes due to economies of scale and ability to plan strategically across a site. Larger developments are more likely to provide greater opportunities for Green Infrastructure to help adapt to the effects of climate change due to economies of scale and ability to plan strategically across a site. The high growth option would see (indicatively) ~90ha of new employment land developed and this scale of development would provide opportunities for renewable energy schemes and green infrastructure development which would help to mitigate the adverse effects of climate change.	
5. Climate Change: To reduce the causes of and adapt to the impacts of climate change.	+/	+/Although the town of Bromsgrove and larger settlements are in relatively sustainable locations for development there would inevitably be an increase in greenhouse gas emissions related to an increase in transport associated with employment development and economic growth. The high growth scenario would see (indicatively) ~90ha of new employment land developed. Development at this scale would offer opportunities to ensure such development was in sustainable locations and thereby helping to reduce the need to travel, although there may still be development in unsustainable locations which would increase car and HGV use and associated emissions, which would likely be significant with this scale of growth. A mixture of minor positive and significant negative effects on this objective are identified.	
		<u>Mitigation</u>	
		The Local Plan could promote the use of public transport, sustainable design and the use of low carbon energy to promote climate resilience and adaptation.	
		<u>Uncertainties</u>	





	Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary
		The precise location of development. Assumptions Whilst there would be opportunities to promote the use of public transport through this option, the reality of economic growth is an increase in car and HGV use.
	++//?	Likely Significant Effects ? There are no European designated sites in Bromsgrove District itself although the European designated Lyppard Grange Ponds SAC and Fen Pools SAC are within 15km of the administrative boundary. At this stage effects on European sites are uncertain. A Habitats Regulations Assessment of the District Plan will be undertaken.
		The District contains 13 Sites of Special Scientific Interest (SSSIs) (three of which are for geological importance). Chaddersley Wood National Nature Reserve is: an Ancient Woodland; a Local Wildlife Site (LWS); a National Nature Reserve (NNR) and a SSSI. Other nature reserves in the District include Upton Warren, which is Worcestershire's premier bird-watching reserve (it attracts birds throughout the year) and Hanbury Woods. Development in proximity to such areas could give rise to significant negative effects.
6. Biodiversity . To conserve and enhance		In addition to the statutorily recognised SSSIs, there are 90 Local (Wildlife) Sites (five of which are recognised for geological value). Development adjacent to such sites could give rise to significant negative effects at this scale of development (indicatively ~90ha).
biodiversity and geodiversity and promote improvements to the		++ Development does also provide the opportunity to secure a net gain in biodiversity so the potential for positive effects is also identified, which could be significant through the development (indicatively) of ~90ha of new employment land.
green infrastructure network.		? There are significant uncertainties in relation to the scoring for this option. The precise location of any employment land development through this option would fully determine the biodiversity effects from any development.
		<u>Mitigation</u>
		Local Plan to require development sites to achieve a net gain in biodiversity where possible. <u>Uncertainties</u>
		The precise location of development. Assumptions
		None.
7. Landscape: To conserve and enhance landscape		Likely Significant Effects
character and townscape.		The Worcestershire County Council Landscape Character Assessment identifies 10 different landscape character types within the District (excluding urban): Estate Farmlands, Principal Settled Farmlands, Principal Timbered Farmlands, Principal Wooded Hills, Sandstone Estatelands,





	Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary
		Settled Farmlands with Pastoral Land Use, Timbered Pastures, Timbered Plateau Farmlands, Wooded Estatelands and Wooded Hills and Farmlands.
		Given the character of the existing landscape it is likely that there would be significant negative effects in relation to landscape associated with any employment development through this option. Whilst the precise location and scale of development would fully determine the landscape effects of this growth option, the scale of development through this option (indicatively ~90ha) would result in loss of greenfield land, which would be likely to be significant. In addition, larger developments are likely to have disproportionately greater landscape impacts as a result of the scale and massing of buildings which are more difficult to mitigate.
		<u>Mitigation</u>
		Good design and landscaping would help to mitigate the loss of greenfield land. <u>Uncertainties</u>
		The precise location of development.
		<u>Assumptions</u>
		It is assumed that there would be loss of greenfield land through the development (indicatively) of ~90ha as there would likely be the
		requirement for development on a number of large sites, with associated land take. Likely Significant Effects
8. Cultural Heritage: To conserve and enhance the historic environment, cultural heritage, character and setting.	?	? The District has 469 Listed Buildings, 839 known sites of Archaeology Interest (13 of which are Scheduled Monuments), 12 Conservation Areas designated as being areas of special architectural or historic interest and 2 registered parks and gardens (Hagley Park and Hewell Grange) and also a number of other historic parks of regional importance.
		Given the above factors an uncertain score is identified in relation to potential effects on built heritage as the precise location of any new employment development would fully determine effects on heritage. With the scale of development proposed through this high growth option (indicatively ~90ha) it may be difficult to avoid development in areas which may have negative effects on heritage, however there may be opportunities to enhance heritage which could be significant through this scale of development.
		<u>Mitigation</u>
		Good design could help to mitigate any adverse effects on cultural heritage.
		The Local Plan could promote the sensitive re-use of listed buildings.
		<u>Uncertainties</u>
		The precise location of development.
		<u>Assumptions</u>





	Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary
		None.
		<u>Likely Significant Effects</u>
	* * * * * * * * * * * * * * * * * * *	Larger developments provide the critical mass to support new health facilities, but the location and scale of provision is partly dependent on the delivery model preferred by health providers.
		Smaller scale development provides the opportunity to support existing facilities.
9. Health and well-being . To improve the health and well-being of the population and reduce inequalities in health.		++ The high growth scenario would see the development (indicatively) of ~90ha of employment land. This scale of development would be likely to generate the need for new health facilities and would be likely to help to support existing facilities which would have a positive effect on this objective. This scale of growth would help to raise wealth levels and living standards with associated positive health effects which at this scale could be significant.
		The reality of economic growth is an increase in car and HGV use and associated emissions which would have negative health effects (the links between air quality and poor health are wide ranging and well known). The scale of emissions and associated health effects from the development (indicatively) of ~90ha of employment land would likely be significant.
		<u>Mitigation</u>
		Uncertainties around the precise location of development at this stage and re-organisation of the NHS Trust's estate. <u>Uncertainties</u>
		The precise location of development.
		<u>Assumptions</u>
		None.
10. Community Participation. To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community.	o	Likely Significant Effects 0 Performance against this objective is considered to be neutral across all options as the community will have the opportunity to participate in decisions through the local plan process, preparation of neighbourhood developments plans (where relevant) and through participation in planning applications that affect them.
		Mitigation None. Uncertainties



	Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary
		The precise location of development. Assumptions None.
11. Housing . To provide decent affordable housing for all, of the right quality and tenure and for local needs, in a clean, safe and pleasant local environment.	~	Likely Significant Effects ~ There is no direct relationship between this option and this objective. However, the development (indicatively) of ~90ha of new employment land would help to raise income levels in the District and in turn increase opportunities for home ownership. This could be significant from this scale of development. Mitigation None. Uncertainties None. Assumptions None.
12. Town Centre Vitality and Community Facilities and Services. To improve the vitality and viability of Town Centres, other centres and communities and the quality of, and equitable access to, local services and facilities regardless of age, gender, ethnicity, disability, socioeconomic status or educational attainment.	++/?	Likely Significant Effects ++/? Through the development (indicatively) of ~90ha of new employment land there would be opportunities to direct this development to Bromsgrove town and larger settlements in the District, which would potentially help to maintain the vitality and viability of these centres. Development at these locations would have positive effects against this objective, which could be significant given the scale of development. Uncertainties are also identified because this growth option could result in new employment development in relatively isolated locations with reliance on the car. This could create difficulties for some members of the community to access services and facilities or be helped by service providers. With the scale of development through this option this could be significant. Mitigation None. Uncertainties The precise location of development. Assumptions None.





		Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary	
13. Economy . To develop a knowledge driven economy which supports the development of new technologies of high value, accompanied by supporting the infrastructure, whilst ensuring all share the benefits, whether urban and rural.	++/?	Likely Significant Effects This growth option would see (indicatively) the development of ~90ha of new employment land. This would help to provide new employment opportunities and support wider economic growth in the District, which would be likely to be significant at this scale of development. ++/? The potential for significant positive effects is identified as locations near the larger settlements with good transport links would provide a sustainable location for such employment development, however the precise location of developments at this stage is uncertain. Mitigation None. Uncertainties The precise location of development. Assumptions	
14. Education . To raise the skill levels and qualifications of the workforce and the quality of education for all.	++/?	Likely Significant Effects Access to jobs and training is more likely in development adjacent/accessible to existing urban areas and Bromsgrove town is the largest employer in the District. Larger employment developments could create opportunities for skills development and training, subject to the type of employment development and the approach taken by employment companies. Larger developments provide the opportunity to incorporate new education facilities to meet additional needs. Smaller developments are more likely to make off-site contributions towards such facilities, so proximity to existing facilities with capacity or potential for expansion becomes more important. The Infrastructure Delivery Plan for the existing Local Plan envisages that existing schools will be expanded to meet planned growth. The extent to which future growth can be accommodated in this manner will need to be explored. ++/? The potential for significant positive effects with some uncertainty is identified as the development (indicatively) of ~90ha of new employment land may generate demand for new education facilities although the extent of this is uncertain. Mitigation None.	





	Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary
		Uncertainties The precise location of development. Assumptions None. Likely Significant Effects
15. Travel . To increase sustainable travel choices and move towards more sustainable travel patterns.	+}??	Bromsgrove District is well served by the national road network, with two major motorways passing through the District (M42 and M5), several major A-roads (A38, A435, A441, A456 and A491) and an extensive rural road network linking the main urban areas in the District with rural villages. There are hourly bus services via Bromsgrove town to Birmingham, Worcester, Kidderminster, Redditch and Stourbridge. Rural areas of the District are served by less frequent bus services which have limited hours of operation. The District is reasonably well served by the rail network, with Bromsgrove train station offering regular services to Birmingham New Street, Great Malvern, Hereford and Worcester Shrub Hill. The Cross City Line, which opened in 2018 provides more services per hour between Bromsgrove and central Birmingham, including stations in between such as Longbridge, Selly Oak/University and Five Ways. Other rail stations that provide a service to urban centres in adjacent local authorities such as Birmingham, Kidderminster and Redditch are situated at Barnt Green, Alvechurch, Wythall and Hagley. There are direct train services between Barnt Green and Alvechurch and Barnt Green and Bromsgrove town. +//? There would be opportunities through the development (indicatively) of ~90ha of new employment land to locate such employment development in sustainable locations accessible by public transport. However, the reality of economic growth is an increase in car and HGV use which would have negative effects on this objective, which would be significant with this scale of development. There is also uncertainty as there is the potential for development to be located in more isolated parts of the District where there is greater reliance on the car, which could be significant with the scale of development. Minor positive and significant negative effects are identified, with some uncertainty. Mittigation The Local Plan could promote the use of public transport and Local Plan to require the preparation of site based Trave



wood.

	Employment Land Growth Option 3: 61-90ha	
SA Objective	Score	Commentary
		None.

wood.

