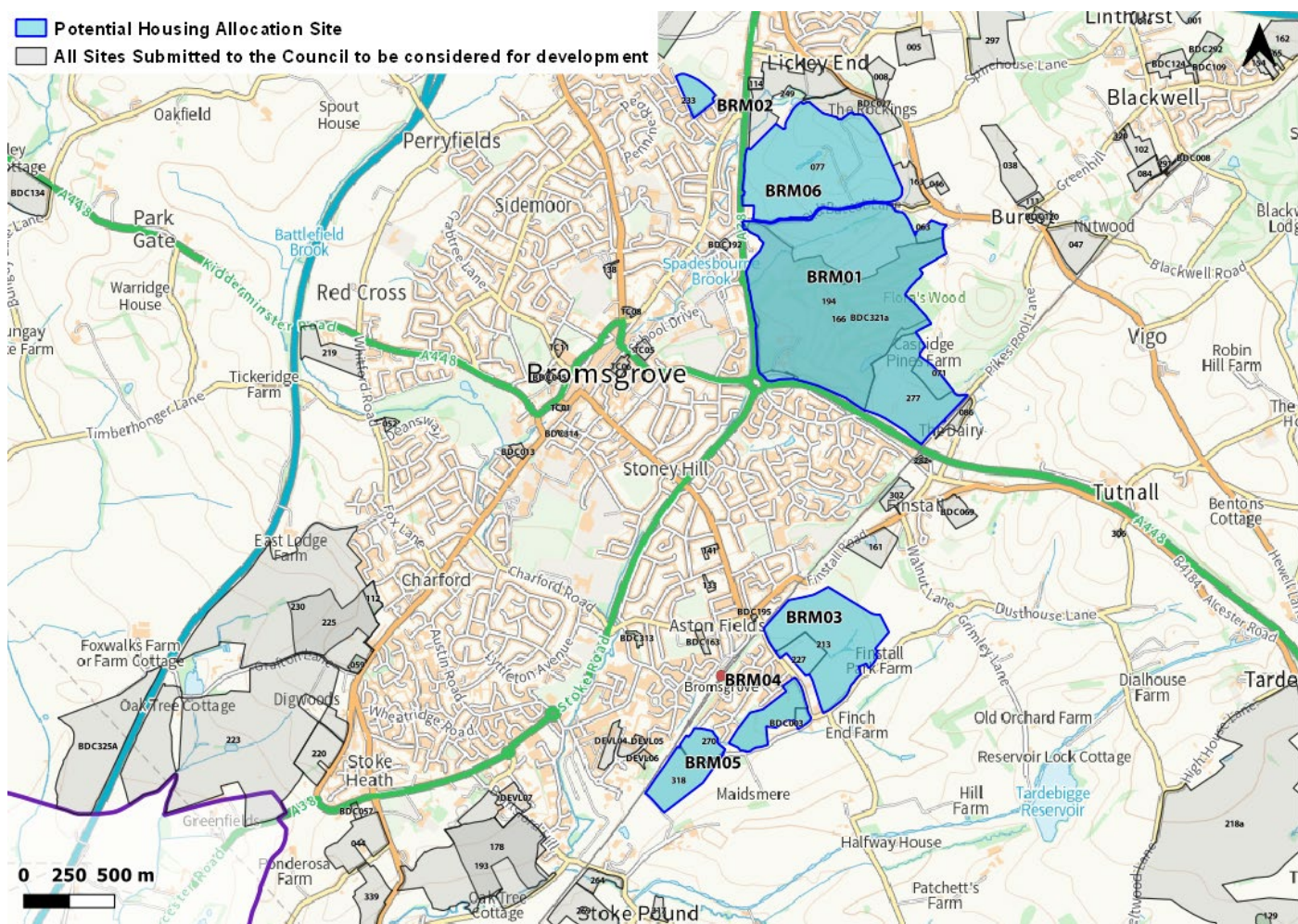


Settlement Summary: Bromsgrove Town



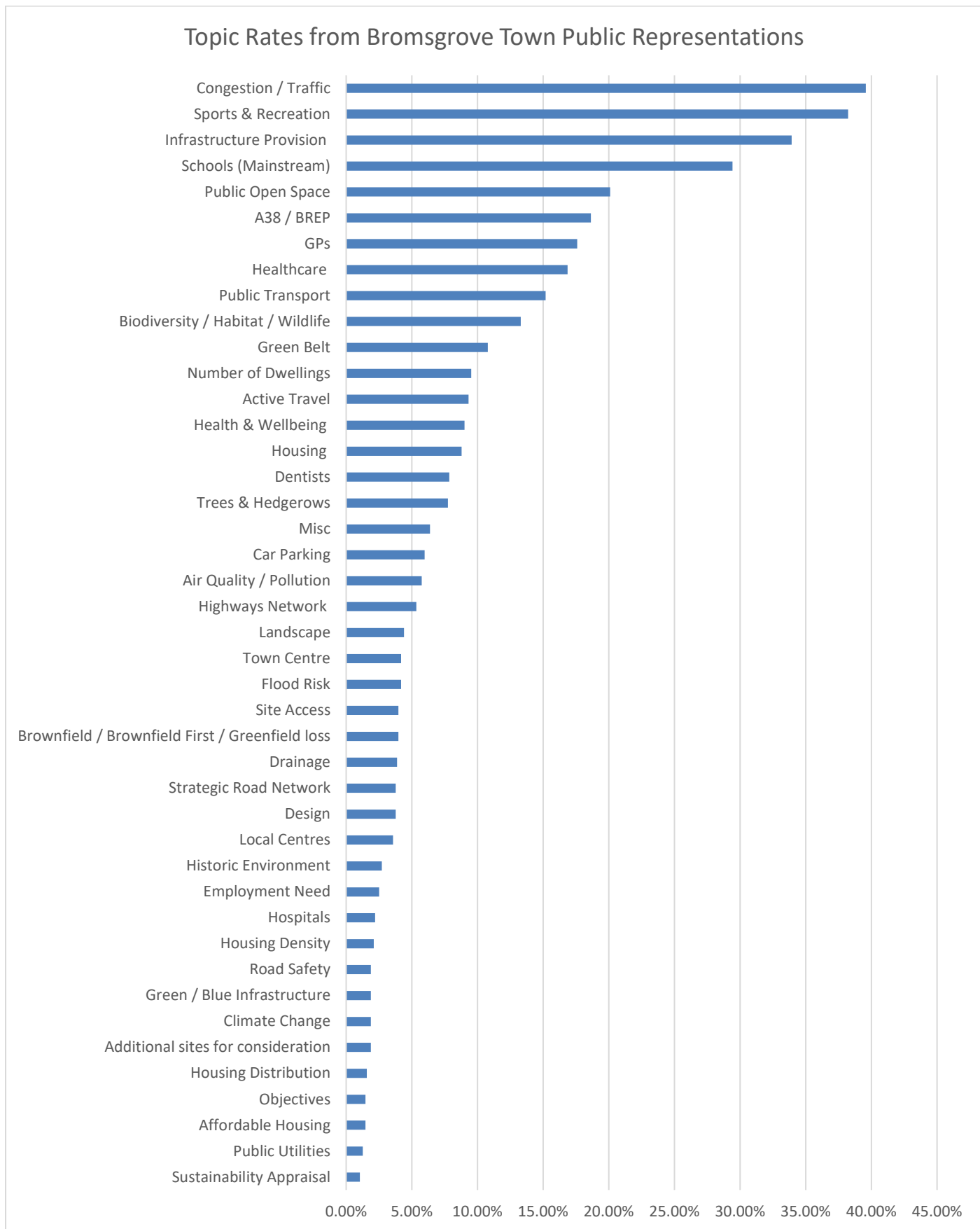
Introduction

This document summarises the responses received during the Draft Development Strategy consultation, which was undertaken between 30th June and 20th October 2025. This document covers responses on the potential site allocations (shown in blue on the above map) as well as topics raised about Bromsgrove Town in general. For context, the map above also shows all other sites in proximity to the village which were submitted through the Call for Sites exercise (shown edged in black on the above map), which were assessed but not included for potential allocation. Comments received on these sites were used to help inform the settlement-wide summary section. This document represents a summary of all comments received. It does not present specific individual representations, or any analysis of the information received.

All summaries have been set out under the following sub-headings: 'settlement-wide' or 'site specific'. They have also been separated by type of respondent, as follows:

- Members of the Public
- Statutory Consultees and Other Stakeholders
- Developers/Landowners

Members of the Public



**Members of the Public:
Settlement-wide – Topics**

Congestion/Traffic: The road network is already at/over-capacity, especially around the A38 corridor and the Oakalls roundabout. There are concerns that more development will lead to rat-running on narrow lanes, school-run pinch points and an increased accident risk. There are requests for safe access strategies, junction upgrades, measures to curb rat-running and improved safety measures to be in place prior to occupation of a dwelling.

Sport and Recreation: Loss of existing sports and recreational facilities: Great concern about the loss of Bromsgrove Golf Centre and the Bromsgrove Cricket, Hockey and Tennis Club, particularly with reference to health & wellbeing, young people’s activity and social cohesion. If development proceeds, there is a strong call for appropriate/equivalent accessible replacements.

Infrastructure: A consistent message that schools, primary care (GPs/dentists), public transport and utilities are already stretched/inadequate. Growth should be conditional on committed, funded and timely delivered infrastructure. Scepticism that infrastructure is not delivered through Section 106 agreements, with some pointing to the lack of infrastructure provided as part of the Oakalls development.

Schools (mainstream): Perception that first/primary/middle/high schools are already full. Fear of longer travel and car dependence to travel to schools outside of Bromsgrove, unless schools are provided on development sites with construction tied to housing occupation to avoid existing families being displaced to schools outside of Bromsgrove.

Public open space: Concerns about the loss of accessible green space and the knock-on for walking, informal recreation and biodiversity. There are calls to retain/replace green assets, keep footpaths and deliver a net gain of green/blue infrastructure that is functional and connected.

A38/BREP: Many respondents feel the BREP works will not be successful and will not add enough capacity for the cumulative growth and will simply shift bottlenecks. Several respondents point to existing constraints at the Oakalls and Slideslow roundabouts and motorway diversion impacts on the town. Strategic mitigation measures (new links, re-configured junctions, or a new bypass/relief road) are requested.

Healthcare: General feeling that respondents have difficulty in accessing GP and dental services that would be exacerbated by the proposed housing growth. New housing growth would require new or appropriately expanded primary care provision.

Green Belt/Brownfield: Concerns about the loss of the Green Belt. Emphasis on the use of brownfield sites first, with some suggesting that there are sufficient sites in Birmingham to build the required number of houses.

Standout / unique insights raised

These are recurring, insights (often location specific) that go beyond general topic labels:

- **Road improvements:** A38 operating suggestions (beyond BREP) including merge in turn signs along pinch points to reduce instances of poor driving behaviour; 30 mph speed limit along the whole of the A38 through Bromsgrove; and a westbound slip road to the M5 at the M42 junction 1 roundabout.
- **A38/School Lane/Old Burcot Lane:** Some note that the M42 interchange and Old Burcot Lane has seen an increase in traffic since the restriction of right-turns into School Lane travelling northbound on the A38. Old Burcot lane is deemed to be already dangerous, particularly in inclement weather, due to its narrow nature and the amount of traffic utilising the lane. Some suggest Old Burcot Lane would need to be widened to accommodate two-way traffic flows to support any development.
- **Stoke Road/New Road/Finstall Road/St Godwald’s Road:** The Stoke Road/New Road/Finstall Road mini-roundabout and St Godwald’s Road junction are reported to be very busy and dangerous, particularly at peak times and for school children crossing the roads. The dangerous nature of St Godwald’s Road is

commented due to its lack of footpath beyond Rutherford Road and restrictions in width due to parked vehicles and it turns into a country lane.

- Community/social infrastructure: The need for new local centres, youth facilities and allotments.
- Power cuts: Some residents note they regularly suffer from power cuts so worry about over-burdening the grid without investment.
- Air and noise quality: Concern that development would lead to more traffic on the A38 corridor resulting in more air and noise quality issues. Suggestion that developments adjacent to busy routes should be setback, incorporate acoustic bunds and planting.
- Settlement separation and character: Residents comment that potential developments (BRM01 and BRM06) may effectively merge Lickey End and Burcot into Bromsgrove, thereby harming the settlement’s character and landscape. Some comments more generally note the resulting urban sprawl from the potential developments and impact on the countryside.

Members of the Public:

BRM01 – Key Points

Scale of loss: Bromsgrove Golf Club has over 1,000 members and ~60,000 rounds of golf are played annually. It hosts one of the largest junior academies in the UK, coaching over 200 young people weekly. Economically, closure could lead to the loss of 80 jobs and impact local suppliers. Risk of losing ~28,000 mature trees. An expanding district will require more, rather than fewer, leisure facilities.

Sport & recreation: Loss of a leisure facility: Highlighted as an important community resource that contributes significantly to the health and social well-being of its visitors, whether engaging in golf, attending events or spending time with family and friends. There are no alternatives within the town of Bromsgrove and limited options across the district. If development proceeds, there is a strong call for an appropriate/equivalent accessible replacement.

Environmental considerations: The Council’s Landscape and Visual Sensitivity Study highlights the adverse effects of losing green space that is both visually and ecologically significant. The golf course comprises wildlife corridors for roe deer and muntjac, with badgers, buzzards, red kites, herons and green woodpeckers among many species who use the course as a food source. The removal of the 28,000 trees would represent a severe environmental loss that cannot be readily mitigated elsewhere, and act against the government’s net zero by 2050 ambitions.

A38/BREP: Concerns about the impact the development would have on current congestion experienced on the A38 and the Oakalls roundabout, noting that BREP will not make a measurable difference. Expectations that mitigation should be provided prior to occupation of new houses. Suggestions for highways mitigation include a new bypass/relief road and junction improvements to the A38 beyond BREP.

Schools (Mainstream): First/Middle/High Schools described as at capacity, with the example that some high school students in Bromsgrove are currently being allocated Waseley Hills High School, Rubery. Requests that schooling is provided on-site in a timely manner tied to occupation.

Healthcare: Residents experience difficulty in accessing GP practices. Request provision of dedicated primary care space (GP and dentist) and would like this delivered prior to occupation of new homes. There is some concern about the access to hospitals, as some residents consider that the Princess of Wales Community Hospital would not be sufficient for the needs of the town.

Active travel and public transport: The site is disconnected from the town centre and Bromsgrove Train Station. There is a lack of walking and cycling links to the town centre and Bromsgrove Train Station that would likely create a high dependency on cars without new active travel infrastructure.

Members of the Public:**BRM01 – Key Points****Members of the Public:****BRM02 – Key Points**

Access and traffic: Concerns about the single access point from Birmingham Road, particularly with another 80 new homes, the narrow estate roads and traffic around the estate. Birmingham Road and the A38 is often congested, particularly at the traffic light junction, additional houses would only exacerbate congestion and access struggles onto Birmingham Road. There are requests for a second access.

Parking: Existing houses on the Norton Farm estate don't have sufficient parking spaces so some resort to parking on the road/pavement causing road safety issues.

Construction: During construction there would be noise and air pollution disrupting daily life for existing residents. Concern about how the logistics of construction would work, including building materials deliveries, and the longevity of the construction works.

Site selection: Some are of the opinion that this is a logical extension to the Norton Farm estate. Although some comment, that the allocation should not extend further north into the recreational green open space area. However, there are also some comments that the site offers recreational and health benefits.

Infrastructure provision: Want to understand what infrastructure would be provided to support the new houses, including schools, GPs and dentists as they are currently at capacity.

Active travel and public transport: How alternatives to driving would be made more appealing and viable for residents. Additionally, requests for wider pedestrian and cycle access.

Members of the Public:**BRM03 – Key Points**

Congestion/Traffic: Numerous reports of heavy congestion in the Aston Fields/Finstall area which would be exacerbated by the potential developments in the area. The current road infrastructure is not deemed to be sufficient to accommodate additional housing. The Stoke Road/New Road/Finstall Road mini-roundabout and St Godwald's Road junction are reported to be very busy and dangerous, particularly at peak times and for school children crossing the roads. The dangerous nature of St Godwald's Road is commented due to its lack of footpath beyond Rutherford Road and restrictions in width due to parked vehicles and it turns into a country lane.

Access: If access were to be granted via St Godwald's Road, it is not currently wide enough for two-way vehicle movements due to current parking arrangements. Action would be necessary to prohibit commuters from parking in roads in proximity to Bromsgrove Train Station, the station car park is underutilised due to car parking charges.

Dusthouse Lane is a narrow country lane which would need widening and improvements to the junctions with Upper and Lower Gambolds Lanes would be necessary. The surrounding lanes are not considered suitable for an increase in traffic without improvements.

Infrastructure provision: The current infrastructure is not deemed sufficient to support additional housing. There are not enough spaces in local schools, doctors and dentists for current demand let alone thousands of new residents. Requests that the required infrastructure is upgraded/built before occupation of the development.

Green Belt: Development undermines the purposes of the Green Belt, preventing sprawl, safeguarding the countryside from encroachment and settlement coalescence. It is used by local residents for walks and running.

Biodiversity: The site is home to an abundance of wildlife, including deer, bats, badgers, rabbit, hedgehogs and birds.

Monarch's Way footpath: Development would degrade the setting and experience of Monarch's Way.

Landscape: Development of the site would cause landscape harm, spoiling views across the countryside.

Trees: Concerned about the trees that line St Godwald's Road. Additionally, some comment that screening would be required to the railway line to mitigate noise pollution.

Members of the Public:

BRM04 – Key Points

Loss of sports and recreational facility: Significant concern about the loss of the Bromsgrove Cricket, Hockey and Tennis Club, particularly with reference to health & wellbeing, young people's activity and social cohesion. If development proceeds, there is a strong call for an appropriate/equivalent accessible replacement, of which a replacement has not been identified. It is noted that an increased population would need more of these recreational and sporting facilities rather than less.

Congestion/Traffic: Numerous reports of heavy congestion in the Aston Fields/Finstall area which would be exacerbated by the potential developments in the area. The current road infrastructure is not deemed to be sufficient to accommodate additional housing. The Stoke Road/New Road/Finstall Road mini-roundabout and St Godwald's Road junction are reported to be very busy and dangerous, particularly at peak times and for school children crossing the roads. The dangerous nature of St Godwald's Road is commented due to its lack of footpath beyond Rutherford Road and restrictions in width due to parked vehicles and it turns into a country lane.

Access: The site is accessed from narrow country lanes which have blind bends. The lanes are frequented by pedestrians, cyclists, horses and agricultural vehicles. Increasing traffic on these lanes would not only create more congestion but result in safety implications. The surrounding lanes are not considered suitable for an increase in traffic without improvements.

Concerns that St Godwald's Road is not appropriate for access to a housing development due to width restrictions; physical and from the current parking arrangements.

Infrastructure provision: The current infrastructure is not deemed sufficient to support additional housing. There are not enough spaces in local schools, doctors and dentists for current demand let alone thousands of new residents. Requests that the required infrastructure is upgraded/built before occupation of the development.

Green Belt/Brownfield: Concerns about the loss of Green Belt land. It is noted that development is adjudged to cause moderate harm to the Green Belt and the site falls within a high/medium landscape sensitivity area. Calls for the use of brownfield land to be developed first.

Active travel: Construction and protection of walking and cycling routes to Bromsgrove Train Station and the town centre.

Members of the Public:**BRM05 – Key Points**

Access: Questions about how a suitable access could be achieved. There are some concerns over the potential use of Rutherford Road and Sidings Close as they are not suitable due to their small residential nature. Their use may also result in safety implications for local residents. Access from Lower Gambolds Lane is also not considered suitable for the development of 190 houses.

Congestion/Traffic: Numerous reports of heavy congestion in the Aston Fields/Finstall area which would be exacerbated by the potential developments in the area. The current road infrastructure is not deemed to be sufficient to accommodate additional housing. The Stoke Road/New Road/Finstall Road mini-roundabout and St Godwald's Road junction are reported to be very busy and dangerous, particularly at peak times and for school children crossing the roads. The dangerous nature of St Godwald's Road is commented due to its lack of footpath beyond Rutherford Road and restrictions in width due to parked vehicles and it turns into a country lane.

Infrastructure provision: The current infrastructure is not deemed sufficient to support additional housing. There are not enough spaces in local schools, doctors and dentists for current demand let alone thousands of new residents. Requests that the required infrastructure is upgraded/built before occupation of the development.

Recreation: This area is used for recreational walking as the footpaths lead to Stoke Pound and the canal and onwards. Decreasing access to open green spaces would impact on the physical and mental health of residents.

Biodiversity: Concerns about the loss of habitats and it is noted that there is a variety of wildlife, including deer, bats, newts, badgers, hedgehogs, rabbits, foxes, mink and birds.

Agricultural land: Opposition to the loss of productive agricultural land.

Brownfield: Residents promote the use of brownfield sites first, including in Birmingham, rather than the loss of greenfields in the countryside and Green Belt.

Members of the Public:**BRM06 – Key Points**

A38/BREP: The A38 is already congested which would be exacerbated by the proposed developments. Respondents feel that the BREP works will not be successful and will not add enough capacity for the cumulative growth. Accidents on the motorways gridlocks the town.

Old Burcot Lane: Old Burcot lane is deemed to be already dangerous, due to its narrow nature and the amount of traffic utilising the lane. Some suggest Old Burcot Lane would need to be widened to accommodate two-way traffic flows to support any development.

Schools (Mainstream): First/Middle/High Schools described as at capacity. Requests that schooling is provided on-site in a timely manner tied to occupation.

Healthcare: Residents experience difficulty in accessing GP practices. Request provision of dedicated primary care space (GP and dentist) and would like this delivered prior to occupation of new homes. There is some concern about the access to hospitals, as some residents consider that the Princess of Wales Community Hospital would not be sufficient for the needs of the town.

Settlement separation and character: Residents comment that potential developments (BRM01 and BRM06) may effectively merge Lickey End and Burcot into Bromsgrove, thereby harming the settlement's character and landscape. Some comments more generally note the resulting urban sprawl from the potential developments and impact on the countryside.

Biodiversity: Concern about the loss of wildlife corridors, including for roe deer and muntjac, badgers, buzzards, red kites, herons and woodpeckers.

Sustainable transport: The site is too far from the town centre and the train station with no meaningful public transport. Development would be unsustainable and car centric.

Agricultural land: Opposition to the loss of productive agricultural land.

Examples of suggested specific infrastructure requirements

- Education: New schools across all tiers. Perception that North Bromsgrove High School and South Bromsgrove High School, in particular, are oversubscribed, with pupils within Bromsgrove sent to other high schools outside the settlement.
- Healthcare: Provision of more primary healthcare, such as doctors and dentists, due to the current struggle to get appointments.
- Public transport and active travel: More frequent buses and safe links to Bromsgrove Train Station. In addition, connected walking and cycling corridors to the town centre and other facilities.
- Local centres, community facilities and recreation: Request for new local centres, shops, parks and other recreational facilities.
- Road improvements: Request for mitigation measures such as new links, re-configured junctions, or a new bypass/relief road around the A38 corridor, beyond BREP. There are also requests for a redesign of the Oakalls roundabout and widening on Old Burcot Lane.

The greatest concern relates to infrastructure provision and timing. By virtue of the scale of development proposed in Bromsgrove, respondents are generally of the opinion that all types of infrastructure would need to be provided prior to development or at appropriate triggers. This includes new schools across all tiers, primary healthcare, public transport provision, active travel connections, road improvements and community facilities.

Statutory Consultees and Other Stakeholders

Statutory Consultees and Other Stakeholders:

Settlement-wide – Key Points

Bromsgrove Primary Care Network - Patient Participation Group:

- The PPG represents patients from nine GP practices in Bromsgrove.
- Acknowledges the need for new housing but raises serious concerns about insufficient infrastructure, particularly:
 - GP capacity: existing surgeries already struggle with building size, staffing, and patient numbers.
 - Social services and Child and Adolescent Mental Health Services (CAMHS): already oversubscribed.
- References the Perryfields development, stating that expected Section 106-funded infrastructure improvements did not materialise, contributing to current pressures on GP practices.
- Emphasised that:
 - Section 106 contributions do *not* fund ongoing staffing or operational costs.
 - Developer contributions must support not only infrastructure but also recruitment, retention, and ongoing staffing costs for primary care.
- Urges the Council to ensure that infrastructure is planned and funded alongside new housing, particularly in key growth areas within Bromsgrove.
- Current GP practices within the town lack physical space and staffing capacity.

CPRE:

- CPRE does not object or support individual BRM sites specifically.
- CPRE suggests three key principles:
 - Integration with the town is essential.
 - Access must be improved, especially with routes linked to Bromsgrove Station.
 - No development should extend southeast beyond Lower Gambolds Lane and Dusthouse Lane, as these must form the new Green Belt boundary.

NHS – Herefordshire and Worcestershire Integrated Care System:

New housing in Bromsgrove District will significantly increase demand on healthcare services. Without developer-funded mitigation, health services will be unable to cope, making development unsustainable.

The 9,280 additional homes proposed in the consultation document would lead to an estimated development population of 21,808 of which 9,377 would be new to the area. This would result in the following 43,142 additional patient events generated by population new to Worcestershire associated with the developments:

- Emergency Department Attendances = 6,144
- Emergency Admissions = 2,585
- Elective Admissions = 210
- Elective Day Case = 3,653
- New Outpatient Appointments = 6,995
- Follow-up Outpatient Appointments = 12,486
- Maternity Care = 2,632
- Diagnostic examination = 8,437

Clinical Infrastructure requirements at this stage in the plan-making process:

- 423 m² of new GP practice floorspace (Bromsgrove town)
- Potential new or expanded primary care facility

- Additional pharmacy capacity
- Larger or additional optometry premises
- Larger or additional dental premises
- Potential expansion of community hospital functions (diagnostics, neighbourhood health)
- Developer contributions toward Worcestershire acute hospital capacity
- Increased ambulance fleet, staffing, and possible hub expansion.

The NHS asks the Council to work with them to co-develop:

- A standardised formula for assessing the health impact of development
- A shared, transparent approach to developer contributions
- A jointly agreed Infrastructure Delivery Plan (IDP) to embed health needs. This process must begin as soon as site allocations are confirmed.

NHS Property Services Ltd:

- Health infrastructure must be treated as essential infrastructure in the Local Plan and funded proportionately by new development.
- New housing places pressure on primary care, community services, and wider NHS estate, requiring:
 - o Developer contributions
 - o Early planning for new or expanded facilities
 - o Integration of NHS strategies within the Local Plan
- Calls for a clear process in determining health contributions, including:
 - o Assessing demand generated by proposals
 - o Understanding capacity of existing healthcare facilities
- Identifying options for increasing capacity and associated capital costs

National Highways:

National Highways is supportive of the aims of the Bromsgrove District Local Plan Draft Development Strategy. In the capacity as Statutory Consultee NH shall continue to engage with the council on matters related to proposed development sites, transport impacts, and opportunities alongside analysis of any mitigations required to deliver these aspirations.

WCC Education:

Bromsgrove:

- Blackwell First, Charford First, Finstall First, Meadows First (PFI), Parkside Middle (PFI), Aston Fields Middle, North Bromsgrove, South Bromsgrove (PFI)
- Early Years = 391 FTE (Full Time Equivalent) (all sites), First = 128 PYG (Per Year Group), Middle = 153 PYG, High = 170 PYG
- First = 3.1 FE (Form Entry) (4) new provision required, Finstall First = 0.5 FE expansion depending on feasibility, Charford First = 0.6 FE expansion depending on feasibility
- Middle = 5.1 FE new provision required
- High = 5.67 FE (6) new provision required.

WCC Planning & Transport Planning:

- WCC supports focusing housing growth in sustainable locations, including Bromsgrove town, where there is good access to public transport and facilities. This is seen as essential to reducing car dependency and supporting modal shift.
- A “critical mass” of homes and jobs is needed to achieve internalisation (i.e., residents meeting daily needs locally), which is particularly relevant for larger sites in Bromsgrove Town.
- Housing sites in and around Bromsgrove town will require:

- Further A38 corridor improvements
- Segregated walking and cycling routes to the town centre and railway station
- Traffic management enhancements
- All infrastructure must be delivered concurrently with housing
- WCC wants early clarity on funding, delivery mechanisms, and phasing, noting risks if infrastructure cannot keep pace with housing.

Worcestershire Wildlife Trust:

- More evidence is required before any Bromsgrove allocation can be accepted.
- Green & Blue Infrastructure must be central to all Bromsgrove allocations.
- Further ecological assessments, including updated habitat surveys, are essential before site boundaries and capacity are confirmed.

Statutory Consultees and Other Stakeholders:

BRM01 – Key Points

CPRE

- Concern is expressed that a very large area of open countryside would be lost if BRM01 is developed.
- Highlighted that Old Burcot Lane is a medieval main road linking Worcester to Leicester.
- BDC should ensure that a new robust and defensible boundary for the Green Belt is adopted.
- Careful consideration ought to be given to the issue of whether there should continue to be a Green Belt gap between BRM01 and Lickey End.

England Golf

Loss of Sports and Recreation Facilities

- Development would result in the *full loss* of Bromsgrove Golf Centre, a major sports facility.
- This would conflict with NPPF paras. 96–99, which require adequate needs assessments before the loss of sports provision.

No Evidence of Needs Assessment

- England Golf states that Bromsgrove District Council has not undertaken a robust supply and demand assessment or an audit of golf provision.
- Therefore, the site cannot be considered surplus to requirements.

Significant Community Use

- The centre hosts c.60,000 rounds of golf per year,
- Has 1,100 members,
- Runs one of the largest junior academies in England (200+ juniors weekly),
- Supports women & girls programmes, inclusive coaching, and disabled golf initiatives.

Environmental, Health and Social Benefits

- The site acts as part of the area's green infrastructure, offering biodiversity, carbon sequestration, and flood mitigation benefits.
- Golf contributes to significant physical and mental health improvements, including for older adults and vulnerable groups.

Economic Impact

- Bromsgrove Golf Centre employs approximately 70 staff, contributes nearly £4 million annually to the local economy, and supports local tourism and hospitality.

Impact on Golf Provision

- Loss of BRM01 would:
- Remove 22% of publicly accessible driving range provision in the district.
- Remove 36% of driving range access within a 20-minute catchment.
- Remove one of only two par-3/short courses in the district.
- Increase green fees by £7 and memberships by £200 across remaining clubs due to demand pressures.

Wider Participation Impacts

- Golf participation in Bromsgrove has grown 27% in five years.
- Remaining clubs are already 28% above national average membership; closure would push this to 46%, considered unsustainable.

Historic England

Historic England notes that the site assessment already identifies designated and non-designated heritage assets requiring consideration.

Additional non-designated heritage features flagged include:

- Royal Observer Corps monitoring point
- World War II pillboxes in the south-east of the site

These would need to be assessed and appropriately protected or mitigated as the Plan progresses.

Environment Agency

BRM01 contains a watercourse crossing the site, which can present flood-risk implications, especially where risk mapping is incomplete. This could reduce the developable area.

National Trust

- The site lies adjacent to land over which the National Trust holds a restrictive covenant (Finstall Park).
- The NT does not object in principle, but raises concern about the scale of landscape change resulting from development.
- High intervisibility is noted, and the NT states that the site is visually sensitive and would require:
 - a full Landscape and Visual Impact Assessment (LVIA)
 - substantial green infrastructure and open space within the masterplan
 - maintenance and enhancement of access and connectivity to wider countryside and green infrastructure networks (including future Regional Park connections).

North Worcestershire Water Management

- Mostly Flood Zone 1, but Burcot Brook crosses the site and creates Flood Zones 2 & 3; some surface water areas reach 1.2m depth.
- Multiple surface water flow paths associated with existing ponds and watercourses.
- Requires drainage strategy to meet 2025 Defra SuDS Standards and local SuDS guidance.
- Freely draining soils, but infiltration requires investigations.
- All ditches, ponds and watercourses must be retained with buffers.
- Watercourses are of high distinctiveness and need a river condition assessment; riparian zone (10m) must be protected.
- Should include green corridors, including along Burcot Brook, and consider improving water vole habitat.
- Management of Himalayan Balsam expected.

Sport England

- It has not been demonstrated that the golf centre is surplus to requirements, contrary to NPPF 104a and Sport England Exception Policy E1.

- No replacement provision has been identified, as required by NPPF 104b and Exception Policy E4.
- The golf centre is a well-used facility, and there is no golf assessment to evidence whether it could be lost without harming local or district-wide provision. Therefore, the loss of the sporting facility is unjustified.
- There is no clear statement on how new housing (across all focus areas) will impact indoor and outdoor sport demand.
- The Council should use its strategic sporting evidence to determine whether new facilities or upgrades to existing sites are needed.
- Sport England recommends using its sports facility and playing pitch calculators to quantify demand.
- Larger development sites may therefore need to provide on-site sports facilities to meet future needs.

WCC Education

Requirements for BRM01, BRM02 and BRM06:

- Blackwell First, Fininstall First, Meadows First (PFI), Parkside Middle (PFI), Aston Fields Middle, North Bromsgrove, South Bromsgrove (PFI)
- EY = 391 FTE (Full Time equivalent) (all sites), First = 95 PYG (Per Year Group), Middle = 153 PYG, High = 170 PYG
- First = 3.1 FE (Form Entry) (4) new provision required, Middle = 5.1 FE new provision required, High = 5.67 FE (6) new provision required.

WCC Planning and Transport Planning

Archaeology

- Identified as a Category 2 archaeological site, due to potential impact on recorded below-ground remains.
- Further archaeological assessment/investigation is recommended prior to determining planning applications.

Ecology / Green Infrastructure

- Development should contribute meaningfully toward Local Nature Recovery Strategy (LNRS) objectives.
- Habitat creation recommended includes:
 - Habitat mosaic (PM23) (Potential Measures)
 - Woodland (PM12)
 - Species-rich neutral grassland (PM29)
- Existing golf course provides shelter/foraging habitat. Ecological surveys required.
- Significant Biodiversity Net Gain (BNG) “cost” expected due to loss of valuable habitats such as woodland.
- Adjacent Local Wildlife Site (Burcot Lane Meadow) requires 50m buffer of sensitively managed semi-natural habitat.
- Presence of a Grassland Inventory Site (APIB) within NE corner which should be incorporated into GI plans.
- Within SSSI Impact Risk Zone (IRZ) consultation with Natural England recommended.

Landscape

- BRM01 considered more impactful due to its scale.
- Significant compensation for vegetation loss will be required.

Worcestershire Regulatory Services

Contaminated Land:

Railway (ref BD/S155100053203) along Sothern boundary, Area of infilled ground along western boundary (ref BD/S561100168359), Tank (ref 14/00969/HM) shown on southeastern boundary, and sewage (BD/S157100018291) just offsite to the northeast. Falls just within 250 metres of a former quarry to the south. Appears to include some structures / area of development.

Nuisance/Noise:

Site borders A38 and A448 with predicted high road traffic noise. The site also borders a railway on the southeast boundary. A full acoustic assessment of these impacts will be required along with good acoustic design to enable suitable development of the edges of this site.

Air Quality:

Close proximity to Lickey End AQMA, could also impact Redditch Road AQMA. Full air quality assessment would need to be undertaken.

Worcestershire Wildlife Trust

- Contains designated and undesignated ecological assets, including potential unimproved grassland of high ecological value.
- These features are likely to reduce the developable area.
- Requires:
 - Strategic GI corridors
 - SUDS infrastructure
 - Buffering of important habitats
 - Detailed surveys for protected species
 - Careful treatment of the existing golf course, especially if publicly accessible open space is needed
- Adjacent to Burcot Cutting SSSI – Natural England should be consulted.

Statutory Consultees and Other Stakeholders:

BRM02 – Key Points

North Worcestershire Water Management

- Entirely Flood Zone 1 with no modelled surface water flood risk.
- Requires drainage strategy meeting 2025 SuDS Standards with rainwater harvesting and treatment measures.
- Freely draining soils suitable for infiltration (subject to testing).
- Support for on-site BNG, and recommendation to link habitats to wider Bromsgrove Brook / Spadesbourne Brook networks.

WCC Education

Requirements for BRM01, BRM02 and BRM06:

- Blackwell First, Finstall First, Meadows First (PFI), Parkside Middle (PFI), Aston Fields Middle, North Bromsgrove, South Bromsgrove (PFI)
- EY = 391 FTE (Full Time equivalent) (all sites), First = 95 PYG (Per Year Group), Middle = 153 PYG, High = 170 PYG
- First = 3.1 FE (Form Entry) (4) new provision required, Middle = 5.1 FE new provision required, High = 5.67 FE (6) new provision required.

WCC Planning and Transport Planning

Ecology / Green Infrastructure

- No protected sites on or adjacent to the site.
- Development should still follow best practice GI principles, including at least 40% GI for major developments.
- GI can include: street trees, verges, orchards, SuDS, and BNG contributions.

Landscape

- No site-specific strategic landscape concerns identified.

Worcestershire Regulatory Services

Contaminated Land:

No CL sites within boundary and not within landfill buffer. Part of larger agricultural area shown as orchards from early 1900s to the 1960s.

Nuisance/Noise:

A38 175m to east of site so will require acoustic assessment re road noise but unlikely to affect development as intervening prior development.

Air Quality:

No adverse comments,

Statutory Consultees and Other Stakeholders:

BRM03 – Key Points

Environment Agency

BRM03 has an unmodelled ordinary watercourse within the boundary, meaning the true flood risk is unknown and requires further investigation. This may affect site deliverability, developable area and sequential test performance.

Historic England

HE notes the presence of heritage assets and recommends:

- Ensuring heritage impacts are considered
- Explore opportunities to incorporate parkland setting and ridge and furrow features into future masterplanning

National Trust

- NT holds a restrictive covenant over Finstall Park immediately north-east of the site.
- NT considers BRM03 to be sustainable in principle due to proximity to the station and existing development.
- NT recommends:
 - Protection and enhancement of Public Rights of Way (PRoW) around and within the site
 - Integration of new development into the wider green infrastructure network
 - Retaining and improving pedestrian access to countryside routes
 - Sensitivity is noted: the covenanted land is assessed as high/medium landscape sensitivity.

North Worcestershire Water Management

- Mostly Flood Zone 1, but small Flood Zone 2 area along an internal watercourse.
- Several surface water flow paths and a larger area in the south with potential 1.2m depth surface water.
- SuDS required under national and local standards.
- Freely draining soils, but verification needed.
- All ditches and ponds must be retained with buffers.
- High-distinctiveness watercourses, river condition assessment required; riparian encroachment must be avoided.
- Request for green corridors, incl. along Newton Brook, and enhancement of water vole habitat.
- Management of Himalayan Balsam expected.

WCC Education

Requirements for BRM03:

- Finstall First, Aston Fields Middle, North Bromsgrove, South Bromsgrove (PFI)
- EY = 391 FTE (Full Time equivalent) (all sites) (included under BRM01, BRM02 and BRM06), First = 15 PYG (Per Year Group), Middle = (included under BRM01, BRM02 and BRM06), High = (included under BRM01, BRM02 and BRM06)
- First = 0.5 FE (Form Entry) expansion – depending on feasibility, Middle = (included under BRM01, BRM02 and BRM06), High = (included under BRM01, BRM02 and BRM06).

WCC Planning and Transport Planning

Ecology / Green Infrastructure

- Significant ditch system through the centre of the site should be retained within a SuDS scheme with riparian habitat creation (PM02) (Potential Measures).
- Adjacent to Irreplaceable Habitat (wood pasture/parkland) 50m buffer recommended to reduce impacts from light, footfall and construction disturbance.

Landscape

- Considered well-linked to the railway station

Worcestershire Regulatory Services

Contaminated Land:

Contains two unknown filled ground features within the site boundary (references BD/S561100168688 and BD/S561100168689) which appear to be former ponds. Former Wagon Works / Transport manufacturing and repair site (reference BD/S109100004099) located adjacent to part of the western boundary and railway (reference BD/S15510005324) adjacent to part of the northwestern boundary. Looks to have been former residential property located within the northern portion of the site identified as Park Cottage. Otherwise large area comprising agricultural fields. **Nuisance/Noise:**

Railway line runs along northern boundary of site which will require an acoustic assessment of impact and mitigation but unlikely to affect development. Also existing commercial farming units on southern boundary will require assessment for noise/odour. However site appears to be this farm's landholding.

Air Quality:

Possible compounding impact from multiple developments in the area - Could impact Redditch Road AQMA. Full Air Quality Assessment would be needed for further conclusions.

Worcestershire Wildlife Trust

- Contains substantial grassland that may be unimproved, posing a potential major ecological constraint if confirmed as priority habitat.
- Trees and hedgerows require protection.
- Potential for bat foraging and commuting routes.
- Requires:
 - o Strong GI
 - o BNG delivery
 - o Further ecological surveys
 - o Assessment of developable area reductions

Statutory Consultees and Other Stakeholders:

BRM04 – Key Points

Environment Agency

There is a watercourse on the boundary of BRM04 that is currently unmodelled, meaning the flood risk may be higher than mapped and should be assessed further. This may constrain masterplanning or reduce the developable area.

North Worcestershire Water Management

- Flood Zone 1, but Newton Brook on western boundary not fully modelled → fluvial risk may be higher than mapped.
- Small surface water flood risk areas along south and west.
- SuDS strategy required with water quality treatment.
- Freely draining soils but need investigation.
- Ditches/ponds must be retained with buffers.
- Watercourse is high distinctiveness, river condition assessment required.
- Green corridors should include Newton Brook; habitat improvements for water voles encouraged.
- Control of Himalayan Balsam expected.

Sport England

Objects to BRM04 because:

- The Council has not demonstrated the site is surplus to requirement, contrary to NPPF 104a and Sport England Exception Policy E1.
- No replacement provision has been identified, contrary to NPPF 104b and Sport England Exception Policy E4.

Playing Pitch Strategy (PPS) evidence shows:

- The BCHT site is heavily used, with little or no spare capacity.
- It serves the largest population area in the district and is vital for multi-sport provision.
- Loss of the site would have a negative local and district-wide impact.
- PPS recommends:
 - Protecting the site.
 - Enhancing facilities to meet demand.
 - Reinstating football pitches to address shortages.
 - If relocated, the replacement should be larger to accommodate demand currently exported to other authorities.

If the Council proceeds with allocating BRM04:

- Early and ongoing engagement with Sport England and national governing bodies is essential.
- Replacement must be:
 - Appropriately located, accessible via active travel.
 - Of equivalent or better quality and quantity.
 - Designed to meet current PPS-identified needs.

WCC Education

Requirements for BRM04 and BRM05:

- Charford First, Catshill Middle, North Bromsgrove (PFI)

- EY = 391 FTE (Full Time equivalent) (all sites) (included under BRM01, BRM02 and BRM06), First = 18 PYG (Per Year Group), Middle = (included under BRM01, BRM02 and BRM06), High = (included under BRM01, BRM02 and BRM06)
- First = 0.6 FE (Form Entry) expansion – depending on feasibility, Middle = (included under BRM01, BRM02 and BRM06), High = (included under BRM01, BRM02 and BRM06).

WCC Planning and Transport Planning

Ecology / Green Infrastructure

- No protected ecological sites within or adjacent the site.
- Should follow best practice with 40% GI provision for major schemes.
- WCC notes development here removes opportunities for enhancing community green space mapped in LNRS.

Landscape

- No specific landscape sensitivities highlighted.
- Identified as well-located in relation to the railway station.

Worcestershire Regulatory Services

Contaminated Land:

Shown as agricultural land on historical maps before development as sports club. No significant potential sites of concern on site or immediately vicinity. May be some made ground associated with development of sports pitches and courts.

Nuisance/Noise:

No nuisance comments

Air Quality:

Possible compounding impact from multiple developments in the area - Could impact recently revoked Redditch Road AQMA. Full Air Quality Assessment would be needed for further conclusions.

Statutory Consultees and Other Stakeholders:

BRM05 – Key Points

Environment Agency

BRM05 has an unmodelled watercourse on its boundary, introducing uncertainty in flood-risk assessment. This may influence the site's suitability until modelled.

North Worcestershire Water Management

- Mainly Flood Zone 1, but Flood Zones 2 & 3 run along the railway.
- Some surface water flow paths and areas linked to Newton Brook.
- SuDS needed under 2025 standards.
- Soils mostly freely draining, with some clay areas.
- All ditches/ponds retained with buffers.
- High-distinctiveness watercourses, river condition assessment needed; achieve watercourse BNG on-site.
- Request for green corridors along Newton Brook and support for water vole habitat enhancement.
- Removal of invasive species expected.

WCC Education

Requirements for BRM04 and BRM05:

- Charford First, Catshill Middle, North Bromsgrove (PFI)

- EY = 391 FTE (Full Time equivalent) (all sites) (included under BRM01, BRM02 and BRM06), First = 18 PYG (Per Year Group), Middle = (included under BRM01, BRM02 and BRM06), High = (included under BRM01, BRM02 and BRM06)
- First = 0.6 FE (Form Entry) expansion – depending on feasibility, Middle = (included under BRM01, BRM02 and BRM06), High = (included under BRM01, BRM02 and BRM06).

WCC Planning and Transport Planning

Waste safeguarding

- Identified as Category 2 waste safeguarding concern due to proximity to the Bromsgrove Bulking Bays Waste Transfer Station.
- WCC does not object, but policy must ensure the waste facility can continue operating without constraints.
- Policy should align with WCS16 and the NPPF “agent of change” principle.

Ecology / GI

- Should contribute to riparian buffer objectives (PM02) (Potential Measures).

Landscape

- Considered well-linked to the railway station.

Worcestershire Regulatory Services

Contaminated Land:

Area of railway land highlighted as potential contaminated land concern running adjacent to the western boundary of the site. No sites of concern within the site boundary with historical mapping showing agricultural use. South western portion of site falls within landfill buffer for Garringtons (Industrial Waste) Landfill and Bromsgrove District Council Depot Landfill.

Nuisance/Noise:

Railway line runs along western boundary of site which will require an acoustic assessment of impact and mitigation but unlikely to affect development.

Air Quality:

Possible compounding impact from multiple developments in the area - Could impact recently revoked Redditch Road AQMA. Full Air Quality Assessment would be needed for further conclusions.

Statutory Consultees and Other Stakeholders:

BRM06 – Key Points

North Worcestershire Water Management

- Mostly Flood Zone 1, but Flood Zones 2 & 3 immediately north.
- Minor surface water flow path likely tied to a ditch/watercourse.
- SuDS required with water quality measures.
- Freely draining soils; infiltration possible subject to investigation.
- Ditches and ponds must be retained.
- Watercourse-related BNG must be delivered on-site.
- Support for green corridors, including along Spadesbourne Brook, with habitat improvement for water voles and management of Himalayan Balsam.
- Recommends extending green-blue network improvements into wider Bromsgrove Town.

WCC Education

Requirements for BRM01, BRM02 and BRM06:

- Blackwell First, Finstall First, Meadows First (PFI), Parkside Middle (PFI), Aston Fields Middle, North Bromsgrove, South Bromsgrove (PFI)
- EY = 391 FTE (Full Time equivalent) (all sites), First = 95 PYG (Per Year Group), Middle = 153 PYG, High = 170 PYG
- First = 3.1 FE (Form Entry) (4) new provision required, Middle = 5.1 FE new provision required, High = 5.67 FE (6) new provision required.

WCC Planning and Transport Planning

Ecology / Green Infrastructure

- Recommended habitat creation includes:
 - Habitat mosaic (PM23) (Potential Measures).
 - Species-rich neutral grassland (PM29) (especially in SE corner).
- Adjacent to Burcot Lane Meadow LWS requires a 50m semi-natural buffer to mitigate light, footfall, noise, dust etc.
- Within SSSI Impact Risk Zone further consultation with Natural England required.

Landscape

- BRM06 is considered more impactful due to its scale.

Worcestershire Regulatory Services

Contaminated Land:

The site contains two features highlighted as potential contaminated land concerns. One is a small pond located to the north of the site that is indicated to have been filled by the late 1930s. The other is referred to as 'tanks' reference 14/00970/HM shown on historical maps dated c. 1904/39, 1954/55, and 1959/68 located in the north eastern corner of the site (grid ref 397454 272175, possibly associated with land at Ashbourne Farm. Historical maps indicate the site has largely been in agricultural use with extensive orchards shown for a significant period of time up until the late 1980s. Orchards may be associated with use of pesticides and herbicides.

Nuisance/Noise:

Site directly adjacent to A38 to the west. Small industrial estate in SW corner with potential of odour and noise impact. Noise assessment for both commercial and road noise required but should not prevent development.

Air Quality:

Close proximity to Lickey End AQMA, could also impact recently revoked Redditch Road AQMA. Full air quality assessment would need to be undertaken.

Worcestershire Wildlife Trust

- Very close to Spadesbourne Brook, water management is critical.
- Brook and downstream water bodies need protection from:
 - Polluted runoff
 - Flood risk
 - Hydrological changes
- Water voles may be present, important species requiring protection.
- As with BRM01, also adjacent to Burcot Cutting SSSI, Natural England involvement advised.
- Requires:
 - Strong, resilient GI
 - Buffer zones
 - Detailed hydrological and ecological surveys
 - Significant BNG contributions

Developers/Landowners

Developers/Landowners:

BRM01 Site Promoters – Key Points

Tor & Co obo Blenheim Strategic Partners (Site 166)

- Housing need has risen sharply while recent delivery is far below target due to insufficient land being released through the plan-led system.
- NPPF requires plans to meet development needs in full, including unmet needs from neighbouring areas. Support allocations to meet LHN but BDC should go further to increase flexibility in supply and affordable housing delivery.
- Site location is most sustainable location as immediately adjacent to Bromsgrove town and within walking distance of town centre. Strong public transport and walking and cycling connections mean new homes can access services and jobs sustainably.
- Site should be classed as Grey Belt. It is also wrongly described as public open space in the Council's own site assessment – it is a private, pay-to-use golf facility and not public open space.
- Broad support for DDS distribution strategy and allocation of BRM01. Support plan for new infrastructure but must meet legal tests of being necessary, related and proportionate.
- Suggestion of 1,300 dwellings on site is indicative only; actual density is untested at this stage.
- Not all sites need onsite employment land.

Lichfields obo St Philips (Site 194)

- Specific local plan vision is required that acknowledges need to assist with unmet needs of GBBCHMA and aligns with NPPF. Plans must be positively prepared and meet the duty to cooperate.
- In principle supportive of Option A of the DDS's distribution strategy and directing growth to Bromsgrove town as the primary urban area with best access to services therefore aligning with sustainability objectives.
- More evidence required to make the strategy sound, including updated SA, revised HEDNA, updated Green/Grey Belt assessment and viability assessment.
- Agree with BDC housing need in the local plan arising from standard method but the DDS has no flexibility or headroom in supply and a buffer should be planned for to accommodate delivery delays and unmet need from the GBBCHMA.
- Support for allocation of proposed BRM01 which is a highly sustainable location, has good access to the A38 and A448, and provides an opportunity to deliver a mix of housing types and tenures, on-site social infrastructure, green and blue infrastructure, formal and informal open space, and enhanced cycling and walking connections.
- The site makes no/low contribution to Green Belt purposes and is a candidate for Grey Belt classification.

Iceni Projects Ltd obo Generator (Sites 071, 277)

- Support allocation of BRM01 but argue Bromsgrove town should take greater share of growth compared to proposed urban extension at Frankley. Clarity also needed on Birmingham's unmet needs and strategy for meeting potential unmet needs of Redditch.
- Proposed site could provide up to 400 dwellings of proposed 1,300 allocation as well as being a landscaped neighbourhood with 42% open space provision.
- The site can be delivered in isolation if required with feasibility for A448 bridge meaning the site is not viewed as remote from services.
- Exceptional circumstances for Green Belt release due to Bromsgrove's housing land supply position and HDT score. Also, a high affordable housing need with over 1,200 households already on waiting list.
- The site should be classed as Grey Belt and has potential to create strong, physical boundaries.
- Concern with infrastructure requirements being asked of BRM01 which are well beyond a development of 1,300 dwellings – an equalisation mechanism would be essential to avoid an unfair burden and ensure viability of this allocation.

Developers/Landowners:

BRM01 Site Promoters – Key Points

- Several evidence base documents need updating including SA, Green/Grey Belt assessment, and a clearer settlement hierarchy.

Developers/Landowners:

BRM02 Site Promoters – Key Points

Pegasus Group obo Catesby Estates (Site 233)

- Agree with proposed allocation of BRM02 based on highly sustainable location on edge of Bromsgrove and site's ability to be delivered quickly compared to larger strategic sites. It is a logical extension to Norton Farm Phase 1 allocation in the previous BDC local plan.
- Current BDP is out of date and a new local plan is therefore essential to meet housing needs and comply with NPPF requirements. The local plan vision should be bespoke and cover the full plan period as opposed to the Council's corporate vision.
- Exceptional circumstances for Green Belt release clearly exist inline with NPPF and as confirmed in SA, most brownfield options have already been utilised.
- Site does not strongly contribute to Green Belt purposes and should be classed as Grey Belt.
- The site can connect into existing green infrastructure networks and active travel links, as well as provide new open spaces (Norton Common and Norton Meadows).
- Lack of constraints exist across the site and it is therefore considered to be suitable, available and achievable.

Developers/Landowners:

BRM03 Site Promoters – Key Points

Carter Jonas obo Persimmon Homes (Site 213)

- Local plan should have its own vision that explicitly embraces development and growth and aligns with NPPF.
- Generally supportive of Option A for distribution strategy to accommodate the LHN for Bromsgrove District.
- Acknowledge increased housing demand from standard method but this should be a minimum requirement. BDC has significant unmet housing need due to past under delivery and also may need to assist with unmet needs from Birmingham.
- Site is available now with technical work showing no major constraints preventing delivery within 5 years.
- Sustainable location close to schools, shops and local facilities in Aston Fields; within 5 minute walk time of Bromsgrove railway station.
- The site is compatible with surrounding residential uses and surrounded on several sides by development, making a logical extension to Bromsgrove. Persimmon contend that the site could be assessed and classed as Grey Belt.
- Other proposed allocations (BRM01 and BRM04) are less suitable as perform more strongly in Green Belt terms, are less well-related to Bromsgrove urban area, and would result in the loss of sports facilities meaning conflict with Sport England policy.

Star Planning obo Richborough (Site 227)

- Local plan should have a dedicated Vision explicitly supporting access to homes, jobs and services. The local plan period should also be until 2044/45 to give full 15 year coverage.
- The standard method for housing need is only a starting point; given evidence of market pressure provided by local indicators such as high house prices and worsening affordability, strong rationale for a

need to plan for 20% above the starting point, i.e. c.14,600 homes. This would also provide flexibility in supply.

- It is also unclear whether BDC have factored in unmet need from neighbouring local authorities.
- Support the main settlement focused strategy for growth but disagree with Green Belt release that relies on uncertain proposals such as a new M5 junction, M42 J1 improvements, or a rail station in the Stoke Prior area.
- Concern over insufficient evidence of traffic impacts on M42 J1 arising from proposed allocation of CA03. Further assessment is required.
- Strongly support proposed allocation of BRM03 as site is a sustainable location with walking access to services, rail station, buses and adjacent to NCN Route 5.
- Limited constraints on site and based on the Council's own dated evidence, the site should be classed as Grey Belt. Site can be delivered as standalone development or as part of more comprehensive development with adjacent (213) site.

Developers/Landowners:

BRM04 Site Promoters – Key Points

Rob Kindon obo BCHTC (Site BDC002, BDC003)

- BCHTC fully support the proposed allocation of BRM04 and are actively pursuing options to facilitate development. The location is close to transport links and must be considered a sustainable location.
- BCHTC is a Not-for-Profit Organisation and it is important to note that 100% of sale proceeds will be invested in a vastly superior replacement sports facility. Consequently, there will be no “loss of amenity” for the residents of Bromsgrove, who will benefit from a greatly enhanced sporting and wellbeing offer.
- BCHTC are working with development partners to appraise a number of suitable Green or Grey Belt sites on the outskirts of Bromsgrove Town and the wider District. The replacement facility should be considered as Compatible Sports Development in the Green Belt as it will primarily promote outdoor sport and recreation that will preserve the openness of the Green Belt. England Cricket Board (ECB), England Hockey (EH), Lawn Tennis Association (LTA) and Sport England have all pledged their support to the proposals.
- In addition, BCHTC are supporting increased community inclusion with several lower impact “walking sports” plus disabled persons competitions and community use. Such is the demand for these activities; the current facilities are now simply inadequate to support the increasing demand.
- BCHTC have had sight of the representations submitted by Stantec on behalf of IM Land, in respect of the land at Worcester Road, Bromsgrove and confirm endorsement of those representations.

Developers/Landowners:

BRM05 Site Promoters – Key Points

Simply Planning obo Bromsgrove Ltd (Sites 270 and 318)

- A separate local plan vision should be developed which is more positive in promoting sustainable development and addressing past under-delivery of housing.
- Broadly support the allocation of development across the district's main settlements.
- Support the proposed allocation of BRM05 which is a *highly sustainable, deliverable and well-connected* location that aligns with the Local Plan's objectives. It is a short walking distance to Bromsgrove train station and sits adjacent to existing modern, residential development. It is also well connected to the PRow network.
- No major physical constraints are identified, and the site is low ecological value agricultural land which can be delivered quickly. The site has clear defensible boundaries and would have negligible visual impact.
- Vehicular access can be taken from an existing turning head on Rutherford Road.

Fisher German obo Mr Powell (Site 270 and 318)

- A separate, more detailed local plan vision is required aligned with the NPPF and explicitly committing to meet full housing and economic needs, including unmet needs from neighbouring authorities. The vision should also adopt a longer-term outlook (at least 30 years) for major strategic proposals.
- Broadly support the Council's infrastructure principles but supporting infrastructure should comply with CIL Regulation 122.
- The DDS underestimates housing need as LHN to 2043 plan period would actually be 12,816 dwellings. Plan also has an insufficient buffer of 51 dwellings, with at least a 5% buffer being suitable. There is also a failure to address wider unmet needs of GBBCHMA.
- A longer plan period would provide stability against any delays to major/strategic site delivery.
- Strongly support allocation of BRM05 as site is largely unconstrained and has good accessibility within walking distance of Bromsgrove train station. The allocation should be extended southwards to the STW/Nordic Walking compound to infill the area logically.
- The site is considered poorly functioning Green Belt and potentially Grey Belt under new definitions.
- Neither support nor opposes the long-term growth option at this stage but a balanced distribution is required across the settlement hierarchy and infrastructure commitments should be realistic and deliverable.

Developers/Landowners:**BRM06 Site Promoters – Key Points****Delta Planning obo Bloor Homes Western and Maximus (Site 077)**

- Support the Council's DDS specifically the proposed allocation of BRM06 but do not make further comment on the wider spatial strategy.
- Infrastructure requirements should be evidence based, proportionate, and site-specific to ensure sites remain viable and deliverable.
- The Settlement Hierarchy Review identifies Bromsgrove as the most sustainable settlement in the district with this site being adjacent to the settlement boundary. An existing pedestrian underpass beneath the A38 can be improved to provide active travel access to services in the town.
- The site is in single ownership and immediately available to contribute to early housing supply. Site also has limited constraints.
- Opportunity to provide a Country Park on edge of development as well as integrated network of green spaces and biodiversity enhancements. Potential to also accommodate a primary school and local centre.

The summaries below are from site promoters who represent sites submitted for consideration that were not presented as preferable for allocation in the consultation document. Comments tend to challenge the housing number or raise concerns regarding the delivery of the potential site allocations in order that additional/alternative sites (their sites) be included for allocation as the plan progresses.

Developers/Landowners:**Settlement-wide (other Bromsgrove Town Site Promoters) – Key Points****Homes England (Site 183)**

- Broadly support direction of the DDS but major concerns that it fails to address unmet housing needs from the GBBCHMA. Revised NPPF clear that unmet need should be addressed using 'available information' on shortfalls.
- Overall housing requirement should therefore be increased by releasing Grey Belt land (reflecting revised NPPF and PPG) and proposing additional allocations in the next iteration of the local plan.

Developers/Landowners:

Settlement-wide (other Bromsgrove Town Site Promoters) – Key Points

- Plan lacks an up-to-date transport and infrastructure capacity assessment which is essential to support growth decisions. Support the focus on growth to the north of Bromsgrove/Catshill due to strategic transport accessibility.
- Whilst site location is identified as an indicative area for potential long-term housing growth, argued that this site should be allocated now.

Lichfields obo UKLD (Bromsgrove) Ltd (Site 193)

- Specific local plan vision is required that acknowledges need to assist with unmet needs of GBBCHMA and aligns with NPPF. Plans must be positively prepared and meet the duty to cooperate.
- Broadly supportive of Option A of the DDS distribution strategy which is consistent with sustainable patterns of development.
- More evidence required to make the strategy sound and demonstrate the chosen option is the most sustainable, including updated SA, revised HEDNA, updated Green/Grey Belt assessment and viability assessment.
- Agree with BDC housing need in the local plan arising from standard method but the DDS has no flexibility or headroom in supply and a buffer should be planned for to accommodate delivery delays and unmet need from the GBBCHMA. BDC proportion of HMA unmet needs is c.9% (c.3,750 dwellings) plus potentially a share of Redditch's portion of shortfall.
- Existing Green Belt evidence does not comply with new NPPF and PPG methodology. Re-assessment should be based on smaller site parcels and identify Grey Belt.

Avison Young obo Landowner (Site 044)

- Support the DDS but recognise that it is strategically vulnerable, particularly around housing numbers, delivery assumptions, and Green Belt considerations.
- Overall housing requirement is understated as existing commitments/supply may shrink, site capacities are based on untested assumptions, there is no delivery trajectory provided to assess impact on 5YLS, no provision is made for safeguarded land contrary to the NPPF, and duty to cooperate with Birmingham is likely to increase BDC's required housing number.

Stantec obo IM Land (Sites 220, 223, 225, 230 and BDC325A)

- The evidence base for the DDS is outdated, in particular the HEDNA including employment land needs and both Green Belt Studies (2019 and 2022). This undermines the soundness of the DDS. Updates are required especially given changes to the NPPF and new standard method.
- The overall housing requirement is underestimated as it lacks clarity in calculation, provides no buffer for non-delivery, and fails to consider the unmet needs of GBBCHMA. A 5-10% buffer should be planned for in addition to a contribution to the GBBCHMA's housing shortfall.
- Support the distribution strategy using Option A (BDC settlements plus edge of conurbation) as well as Option B (BDC settlements only). This would support a wider spread of development and earlier delivery avoiding an over reliance on slow to deliver sites such as proposed FRA01.
- The current employment land figure (28ha) is based on outdated evidence. With higher housing growth from the standard method and increased labour supply, the local plan must recalculate employment needs and allocate more sites.
- This site is suitable for mixed use development combining housing and employment uses. It can deliver short-term local housing need as well as long-term growth.

Harris Lamb obo Barberry Ltd (Site 178)

- Plan period to 2043 may not meet the required 15 years post adoption.
- Overall housing requirement is too low as does not provide for unmet need from the wider HMA (exceeding 73,000 dwellings), has no upward adjustment for affordability, economic growth or improving affordable housing delivery, and does not include a buffer.
- Evidence on Green Belt needs updating to reflect Grey Belt guidance.

Developers/Landowners:

Settlement-wide (other Bromsgrove Town Site Promoters) – Key Points

- Capacity assumptions based on net developable areas are unrealistic on allocations.
- Safeguarded land should be identified consistent with NPPF para 145, with Bromsgrove as the main settlement in the district being an appropriate focus.
- Sites or growth areas near motorway junctions may be better suited to employment development and not just housing.

Marrons obo Rainier Developments Ltd (Site 219)

- The local plan must contain a plan-specific vision and strategic priorities focusing on the district's housing crisis and long-standing housing land supply issues. Should also be based on positively prepared evidence-led planning.
- The overall housing requirement to meet LHN assumes 3,000 commitments but evidence shows a figure of 2,152 dwellings in supply. Unmet housing need from the GBBCHMA should also be addressed in the local plan.
- Support for Option B within DDS and SA – development at Bromsgrove settlements only, as the most sustainable spatial pattern.
- Proposed allocation at FRA01 lacks adequate evidence on delivery, infrastructure, phasing and lead-in time – it therefore may not contribute significantly to the plan period's deliverable supply. FRA01 is also more likely to serve Birmingham's unmet needs rather than Bromsgrove District's.

Conclusion

This document summarises the consultation responses in relation to the settlement and the potential sites for allocation (edged in blue on the above map) only. It highlights areas of concern associated with potential development allocations in and around this settlement, that have been voiced through the consultation process. Comments made relating to other submitted sites (edged in black on the above map) have been used to inform the wider settlement issues.

Further work still needs to be undertaken, which includes but not limited to:

- Continued analysis of all representations received,
- Additional evidence collection,
- Further Consideration of alternative sites for potential allocation.
- Follow up and clarification of required infrastructure provision to support future development options.