



Consultation Statement

Bromsgrove District Plan

September 2013



Consultation Statement

This document accompanies the Proposed Submission version of the Bromsgrove District Plan. The report is a statutory requirement under the regulations and provides evidence of how the council has engaged with stakeholders when preparing the plan. The Consultation Statement has been produced under Regulation 17(d) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This document is not being consulted on and is background evidence.

This document is available on our website, in all libraries, the Customer Service Centre and at the Council House.

Any queries about the report should be sent to:

The Strategic Planning Team

Planning and Regeneration Services

Bromsgrove District Council

The Council House

Burcot Lane

Bromsgrove

B60 1AA

Telephone 01527 88 1323

Email strategicplanning@bromsgroveandredditch.gov.uk

Website <http://www.bromsgrove.gov.uk/strategicplanning>

Executive Summary

We are publishing this report to show how extensive public consultation has helped to shape the Bromsgrove District Plan. It is also a statutory requirement under the regulations.

When reading this report it is important to remember that since the production of the Bromsgrove District Plan (formerly known as the Core Strategy) began in 2005 the regulations which shape how and when public consultation should be done have changed significantly and become more flexible.

A great many stakeholders have been consulted on the contents of the plan. This includes a number of specific consultation bodies which we must consult. These are mostly neighbouring authorities and government agencies. There are also general consultation bodies, which are organisations we feel would want to be engaged in the plan, such as infrastructure providers. Those who live or do business in the District have also been widely consulted. We have tried to maximise, as far as possible, the amount of people who have been able to have their say on the contents of the plan.

Whilst there has been background work which has gone on between consultation periods, there have been seven formal opportunities when we have asked stakeholders to help shape the contents of the plan.

2005 Issues and Options consultation

This consultation focussed very much on the main issues affecting the district and the literature produced for the consultation set out a range of options under each of the key issues. This was to ensure that all realistic options were considered by stakeholders.

This was the first formal consultation for the plan and began in June 2005 when the Issues and Options document was published. The consultation period ran for 6 weeks.

2007 Further Issues and Options consultation

In 2007 five new issues had arisen and a decision was taken that a further Issues and Options consultation was required. The new issues were new housing growth, climate change and renewable energy, flood risk, waste and recycling and biodiversity.

Following the use of a range of consultation methods a total of approximately 120 responses were received in the form of questionnaire responses, letters and emails.

2008 Draft Core Strategy Spatial Vision Consultation

The vision for the District was considered to be a key overarching element that would shape policies within the Core Strategy. On this basis the Council decided to

undertake a separate consultation solely on this issue prior to the publication of the Draft Core Strategy.

Despite every effort to engage with key stakeholders and the general public no formal responses were received to this consultation. The vision was therefore included in the Draft Core Strategy without any further changes.

2008 Draft Core Strategy Consultation

The responses received to the previous issues and options consultations were a significant influence on the contents of this document.

On 31st October 2008 the Draft Core Strategy was published with the consultation period running until 16th February 2009 aiming to ensure that all interested parties had an opportunity to get involved. A range of methods were used to engage with interested parties. These included letters, meetings and a 'drop in' event.

In total 127 responses were received to the consultation on the Draft Core Strategy. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District. The responses received led to a number of significant changes in the formulation of the DCS2 including additional policies on a settlement hierarchy, accommodation for the elderly and the Green Belt.

2010 Redditch Growth Options Consultation

The primary purposes of this joint consultation was to seek views on the growth in three broad areas around the north and west of Redditch within Bromsgrove District, convey the message that Redditch had very little capacity within the Borough for new growth but to identify the sites on which some of the growth could be accommodated, including 2 areas of Green Belt land within Redditch. The three areas of growth identified adjacent to the boundary of Redditch but within Bromsgrove District were East of the A441, West of the A441 and adjacent to the A448.

The aim of the consultation was to primarily focus on the communities on the edge of Redditch who would potentially be most affected by any development. Every effort was made to ensure all sections of these communities were fully involved, with a number of consultation events held at different times of the day and week including evenings and weekends.

In total 123 responses were received to the Redditch growth consultation. Views were expressed by many different groups, developers, businesses and individuals who either live or work in Bromsgrove or Redditch or have an interest in the area.

2011 Draft Core Strategy 2 Consultation

The Draft Core Strategy 2 took into account all previous consultation exercises, national and regional policies and up to date local evidence. The document was

published for consultation on January 21st 2011 for a period of 12 weeks until April 15th 2011 ensuring that all interested parties had an opportunity to get involved.

A range of consultation methods were again used including 'drop-in' events. The events were held at different days and times over a 3 week period including weekends and evening in some instances. This gave everyone an opportunity to attend regardless of whether they worked full-time or were on holiday for some of the events.

In total 2248 individual responses were received to the Draft Core Strategy II. In addition 2 petitions were submitted one contained 487 signatures whilst the other totalled 1016 signatures. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District. Responses were received on all elements of the document including the spatial vision and each of the 24 policies. Some comments were general and related to the document as a whole; however the majority were site specific in relation to the proposed strategic allocations and development sites within the document.

In conjunction with new local evidence and the NPPF the responses received led to changes within each policy contained within the Bromsgrove District Plan. These range from minor wording changes to a more significant shift in the intent and purpose of the policy.

2011 Town Centre Area Action Plan Consultation

The Town Centre Area Action Plan (TCAAP) took into account all previous consultation exercises, national and regional policies and up to date local evidence. The document was published alongside the Draft Core Strategy 2 for consultation on January 21st 2011 for a period of 12 weeks until April 15th 2011 ensuring that all interested parties had an opportunity to get involved.

A range of consultation methods were again used including 'drop-in' events. The events were held at different days and times over a 3 week period including weekends and evening in some instances. This gave everyone an opportunity to attend regardless of whether they worked full-time or were on holiday for some of the events.

In total 115 individual responses were received to the TCAAP. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District. Responses were received on many elements of the document including the vision, objectives and each of the policies. Although the majority of comments were general observations about the regeneration of the Town Centre.

Following the publication of the NPPF the Council decided not to pursue a separate AAP and the key sections were incorporated into the Bromsgrove District Plan. The Town Centre Regeneration Policy (BDP17) in the Bromsgrove District Plan was amended to reflect comments made to both the Draft Core Strategy 2 and the Town Centre Area Action Plan.

2013 Housing Growth Consultation

This joint consultation built on the previous Redditch Growth Options Consultation held in 2010. This consultation did however go into further detail and identified specific sites to accommodate the required levels of cross-boundary growth. These sites are located to the west and north of Redditch at Brockhill and Foxlydiate.

A range of consultation methods were again used including 'drop-in' events. A total of 6 events were held in different locations within both Bromsgrove District and Redditch Borough and at different days and times over the consultation period including weekends and evening in some instances. This gave everyone an opportunity to attend regardless of whether they worked full-time or were on holiday for some of the events.

In total 456 individual responses were received to Housing Growth Consultation. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District.

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1. Introduction

- 1.1 This statement sets out the information required under Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in relation to the Bromsgrove District Plan. Regulation 17(d) requires that the local planning authority must prepare a statement setting out evidence relating to the following:
- i. which bodies and persons were invited to make representations under regulation 18
 - ii. how those bodies and persons were invited to make such representations
 - iii. a summary of the main issues raised by those representations
 - iv. how those main issues were addressed in the DPD.
- 1.2 Background to the Plan**
- 1.3 The Bromsgrove District Plan will be the blueprint for the development of the district up to 2030. It contains a vision for the future of the district, the objectives needed to achieve the vision together with the land allocations and policies designed to achieve the plan's objectives. As well as the contents of the plan, stakeholders have also been able to, and encouraged to, engage with the sustainability appraisal of the plan.
- 1.4 Changing Regulations**
- 1.5 The preparation of the Bromsgrove District Plan began in 2004 and the plan is expected to be adopted in 2014. The Statement of Community Involvement (SCI) was adopted in September 2006. However since the adoption of the SCI, the regulations surrounding the preparation of DPDs have been revised several times. Firstly Regulations 25 and 26 of the Town and Country Planning (Local Development) (England) Regulations 2004 merged into Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2008. There were then more minor amendments made as a result of The Town and Country Planning (Local Development) (England) Amendment Regulations 2009. On the 6th April 2012 the Town and Country Planning (Local Planning) (England) Regulations 2012 came into force which revoked all of the above mentioned regulations.
- 1.6 The adopted SCI was used to guide the early stages of consultation in 2006 and 2007. The 2008 regulations came into force on 27th June 2008. Since then, consultation on the Bromsgrove District Plan has complied with the 2008 and 2009 regulations, the advice contained in the two versions of PPS12 and most recently the National Planning Policy Framework (NPPF) and the 2012 Regulations. Throughout the process all consultation periods have been informed by the principles and overarching approach set out in the adopted SCI.
- 1.7 In the past, under *Planning policy statement 12: Local Development Frameworks* and the 2004 regulations, the preparation of a DPD was split into specific "prepare issues and alternative options in consultation" (regulation 25) and have "public participation on preferred options" (regulation 26) stages. Under first the revised *Planning policy statement 12: Local Spatial Planning* and the 2008 regulations and now the NPPF and 2012 Regulations

this has been revised to be far more flexible. Paragraph 155 of the NPPF simply states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

- 1.8 The SCI made a commitment to using different ways of communicating and different types events to involve the community in the development of DPDs and make the process as inclusive as possible.
- 1.9 The Council is committed to engaging with as many people as possible from a diverse range of backgrounds across all sectors of the local community. The SCI identifies the following hard to reach groups:
 - Single parents
 - Disabled People
 - Carers
 - Elderly
 - Young People
 - Black and Minority Ethnic Groups
- 1.10 The SCI goes on to state that in an attempt to remove barriers to involvement for these groups the Council will:
 - Use a variety of involvement techniques to reach as many people as possible;
 - Reach rural communities through Parish Councils;
 - Hold events outside of normal working hours;
 - Contact specific representative groups for advice on encouraging involvement; and
 - Produce documents in different languages and formats

2. Who has been invited to make representations?

- 2.1 All sets of the regulations set out a certain number of organisations which *must* be consulted. These are called specific consultation bodies. We are also encouraged to consult other organisations and groups who have an interest in the area. These are called general consultation bodies. Lastly, we are encouraged, depending on the scope of the DPD being prepared, to engage with the district's residents and those carrying out business in the area.
- 2.2 A Local Development Framework consultation database was set up in 2004 to ensure up to date records were kept of those who wished to be informed about the progress of planning policy documents.
- 2.3 Specific consultation bodies**
- 2.4 Please note that a number of these organisations were updated as a result of the 2012 regulations, either by being added to the list, the name of the organisation being amended or removed from the list. The specific consultation bodies who were encouraged to engage with the Bromsgrove District Plan are attached as appendix A.
- 2.5 General consultation bodies**
- 2.6 The list of these was originally derived from the LDF consultation database (see appendix 3 of the SCI for the original list) and has been regularly updated since then with interested organisations and bodies being added and companies that no longer exist being removed. There are now a total of 3051 contacts within the database.
- 2.7 Developers and planning consultants**
- 2.8 Given the extensive scope of the Bromsgrove District Plan and the impact it is likely to have on the development industry, this set of stakeholders were widely consulted.
- 2.9 Individuals**
- 2.10 Residents were consistently and extensively engaged with throughout the preparation of the plan as it will potentially have an impact on everyone who lives in the district.
- 2.11 Overall, the intention of consultation on the Bromsgrove District Plan has been to ensure that as many stakeholders as possible were able to engage in the preparation of the plan.

3. Issues and Options (2005)

- 3.1 This consultation focussed very much on the main issues affecting the district and the literature produced for the consultation set out a range of options under each of the key issues. This was to ensure that all realistic options were considered by stakeholders.
- 3.2 This was the first formal consultation for the plan and began in June 2005 when the Issues and Options document was published and the consultation period ran for 6 weeks.
- 3.3 Which Consultation Methods were used?**
- 3.4 An event was held in March 2005 in the Council Chamber, in order to publicise the new LDF process and the Statement of Community Involvement. The event consisted of a presentation on the new planning system and then a workshop on core issues. 'Planning for real' techniques of public involvement were also used. An exhibition was also displayed outlining the LDF process and planning officers were on hand to give out leaflets, questionnaires and answer queries.
- 3.5 Over 200 people from the community and local organisations were invited to attend and this was publicised in the local press. Over the two sessions, afternoon and evening, 75 people attended. Attendees included local residents, community groups, local businesses and environmental groups.
- 3.6 A questionnaire survey was prepared on each of the 10 key issues and sent to a wide range of key stakeholders. Face to face focus group meetings were held with interested parties which included community groups, environmental organisations, Parish Councils, local businesses and Registered Social Landlords. A total of 9 focus groups were held with each addressing a different key issue. The focus groups were held at the Council House on the following dates:
4th July 2pm
6th July 11am
7th July 11am
7th July 2pm
8th July 11am
8th July 2pm
11th July 2pm
18th July 11am
18th July 2pm
- 3.7 Area meetings were held with Parish Councils and other community groups to let people know about the new planning system and present the issues and options consultation and invite responses.

3.8 What comments were received and how were these addressed?

3.9 A total of 50 questionnaire responses were received and 26 other responses were received in the form of a letter or email. They were from a range of groups and individuals including businesses, residents, community groups and statutory consultees.

3.10 The table below sets out the key issues raised during the consultation and how they were taken on board in the Draft Core Strategy (2008). Further details can also be found within Draft Core Strategy Consultation Report.

Issues Raised In Issues & Options Consultation (2005)	How they were addressed in Draft Core Strategy (2008)
<p>Key Issue A Locations for Growth</p> <p>The majority of people felt that new housing and employment growth should be concentrated in Bromsgrove Town, with limited brownfield development in other settlements (i.e. Hagley, Alvechurch, Wythall).</p> <p>Strong support was given to deciding which ADR sites to release only after housing and employment land allocations are known. It has been argued that this option is most in accordance with central and regional planning policy. It was suggested that we should consider the housing and employment requirements in the District and then analyse the most sustainable locations to meet the needs of both urban and rural population.</p> <p>Strong support was also expressed towards prioritising the release of ADR sites, with those around Bromsgrove Town being released first.</p> <p>Most people were in favour of allowing reuse of previously developed sites in the Green Belt for the most appropriate use.</p>	<p>The Key diagram identified areas of potential growth around Bromsgrove Town. The hierarchy in CP2 seeks to meet development needs on brownfield land in the first instance.</p> <p>It was acknowledged that it was essential for the Core Strategy to be in conformity with the emerging RSS at this point in time. Housing related policies were written flexibly to cater for an uncertain target. Many of the ADRs were identified as areas of potential growth on the key diagram.</p> <p>CP2 identified that the primary location for growth will be Bromsgrove Town. CP14 sought to carefully manage the sites that came forward to ensure the maintenance of a 5 year supply.</p> <p>CP2 supported redevelopment or re-use for housing in the Green Belt where it accorded with PPG2.</p>
<p>Key Issue B Housing for Everyone</p> <p>There was no clear consensus with regards to the future type of housing required in Bromsgrove. Most support was given to ensuring all schemes were supported by a needs assessment. Slightly less support was shown for more specialised accommodation for the aging population and prioritising smaller dwellings whilst also ensuring an adequate supply of family housing.</p> <p>The majority of people favoured allowing</p>	<p>A Bromsgrove Housing Market Assessment (HMA) was completed in 2008 and was a key piece of evidence which informed the first Core Strategy. It identified a need for smaller houses and accommodation suitable for the elderly. This was reflected in CP12.</p> <p>The hierarchy in CP2 sought to meet</p>

<p>limited general housing on brownfield sites with a high level of affordable housing provision. Less support was given to the idea of allocating land for affordable housing, and using Green Belt land adjacent to settlements. It has been argued that development of affordable housing should be spread throughout housing District-wide. The development of ADR's should include some affordable housing and is preferable to Green Belt release.</p> <p>No clear consensus was revealed in relation to the supply of housing. Some suggested that the Council should provide a modest and regular supply of housing</p>	<p>development needs on brownfield land in the first instance whilst CP16 proposed 40% affordable housing to help meet the high level of need. The threshold of 0.4 hectares or 10 dwellings meant that all ADRs would need to provide on-site affordable housing. The HMA identified a high level of affordable housing need across the district and the proposed threshold mentioned above would mean affordable housing could be delivered in large settlements. Criteria d) of CP16 set out that affordable housing would only be allowed in the Green Belt adjacent to settlements where a local need had been established.</p> <p>It was essential at this point in time that the Core Strategy was written flexibly to ensure that it could deliver any housing target from the emerging RSS. Whilst the views of respondents in relation to a modest target were noted conformity with the RSS was fundamental whether the housing target is modest or much higher.</p>
<p>Key Issue C Rural Life</p> <p>Identifying mixed-use village centres for local services was considered to be the most sustainable way to ensuring that the villages contain a range of essential services. This was closely followed by the idea of locating key services in the main settlements and improving transport links. Very little support was given to resisting change of use of all existing facilities in villages.</p> <p>Most people felt that village characteristics and supporting infrastructure should be considered before allowing new development. Allowing a wider mix of housing in rural to maintain essential facilities is also seen as an important consideration.</p> <p>It has been argued that settlements with a full range of facilities should be allowed to expand in order to provide support for facilities and to cater for the needs of the local population.</p> <p>There was a clear consensus of people who felt existing rural business should be supported by allowing limited extension within villages with adequate infrastructure. No support was given to the idea of only allowing conversion of rural buildings to employment use. There was support for farming and rural diversification.</p> <p>The idea that improvements should be made</p>	<p>CP3 sets out that proposals that lead to an improvement in the range and quality of services in rural areas would be supported. Whilst CP17 sought to retain existing local services and community facilities.</p> <p>CP17 highlighted that development proposals would be required to provide or contribute to local infrastructure to make a scheme acceptable in planning terms. It was also emphasised in CP3 that proposals should not have an unacceptable impact on rural landscapes or existing character.</p> <p>The key diagram identified areas of potential growth in a number of settlements which would help to support local facilities.</p> <p>Criteria a) of CP3 made specific reference to supporting the sustainable diversification and development of the rural economy through the growth of existing businesses.</p> <p>CP10 supported an increase in the use of</p>

<p>to transport links connecting to Bromsgrove Town was supported. It was also suggested that the higher order settlements should be allowed to expand naturally to ensure facilities are both maintained and increased thereby increasing accessibility of these facilities to local residents.</p>	<p>sustainable modes of transport and focuses development in the most sustainable locations. CP3 set out that proposals that lead to an improvement in the range and quality of services in rural areas would be supported.</p>
<p>Key Issue D The Local Economy and Creating Jobs</p> <p>Most people were in favour of keeping a balanced economy with a mixture of sectors and jobs. It was been argued that the attraction of industries with higher paid jobs into the Bromsgrove District will help to reduce daily out-commuting.</p> <p>The majority of people were in favour of small areas of employment within main settlements to support small-scale local firms. Support was also expressed for redeveloping and extending employments in the town. No support was shown for the idea to balance provision in Bromsgrove Town by developing large business parks on greenfield ADR sites to west of Bromsgrove.</p> <p>It was suggested that consideration should be given to opportunities for the reuse and adaptation of vacant or underused buildings within the main settlements to help promote new business growth.</p> <p>Strong support was shown towards encouraging new business to locate in main settlements, whilst continuing to support existing business in the rural areas. Support was also expressed for encouraging the reuse of rural buildings to provide small-scale office accommodation.</p> <p>No clear consensus was revealed on the issue of reusing redundant employment sites. Support was expressed towards promoting a mix of employment generating activities, and reuse for non-employment uses. Slightly less importance was expressed for retaining sites for traditional employment uses only. Some showed support housing or mixed-use developments on former employment sites.</p> <p>It was highlighted that economic growth in the district will result in increased house prices if it is not matched by increased levels of house building.</p>	<p>CP8 supported a range of employment types whilst focussing on high technology development which should create well paid jobs and reduce commuting levels.</p> <p>CP3 and CP8 both supported the expansion of existing employment sites in both the town and other settlements. The document did not propose any new large scale sites.</p> <p>Whilst this was not specifically addressed within this strategic document CP8 did promote a range and choice of readily available employment sites to meet the needs of the local economy.</p> <p>CP8 sets of criteria for new employment proposals which will guide development to the most sustainable locations. CP3 supports the sustainable growth of existing rural businesses. The re-use of rural buildings is not specifically mentioned as this is a strategic document.</p> <p>The need to retain sites for employment purposes was highlighted within CP8. The policy did set out criteria that need to be met to permit a change of use from employment. A preference for mixed use (including employment) was emphasised.</p> <p>It was acknowledged that there needs to be an appropriate balance between new housing and employment. Employment and housing policies had both been flexibly written at this point in time to allow for changes to emerging RSS targets.</p>
<p>Key Issue E Shopping & Bromsgrove Town Centre</p>	

<p>The majority of people favoured a modest expansion of Bromsgrove Town Centre to serve local needs. Less support was expressed towards promoting larger scale expansion so as to compete with other popular centres. It was felt that Bromsgrove Town Centre should continue to be the main centre within the District.</p> <p>Strong support was expressed for a mix of uses including shopping, leisure (including the evening economy) and residential whilst retaining and enhancing the distinctive character of the town centre.</p> <p>A clear consensus was expressed for a mix of uses with shopping being the main use in other local centres. It was commented that new housing would support the viability of other local shopping centres.</p>	<p>The Bromsgrove Town Centre AAP will guide the redevelopment of the town centre. CP9 emphasised that the Council will continue to support proposals that strengthen the role of Town Centre highlighting that some expansion may be required to meet the needs of a growing population.</p> <p>The Town Centre AAP will determine the mix of uses. CP6 highlighted that proposals will need to preserve and/or enhance the character and appearance of conservation areas whilst preserving the setting of listed buildings.</p> <p>CP17 sought to retain services and facilities within settlements. The key diagram identified areas of growth in a number of settlements which would help to support local retail.</p>
<p>Key Issue F Learning, Leisure and Improving Health</p> <p>The majority of support was expressed towards providing open space in wards and parishes where there is an identified under-provision. Improving larger areas and providing a large number of small accessible areas were also considered to be important. There was support for a mix of strategically placed large parks, pocket parks and more generally a mix of different types of open space. The provision of play facilities was supported to give children something to do.</p> <p>There was no clear consensus on the provision of health facilities. Most people opted for safeguarding key accessible sites for future health service provision. The consultation emphasised the need for people to have a GP who was easily accessible.</p>	<p>CP11 highlighted that all proposals should contribute quantitatively and/or qualitatively to existing facilities. Although planning contributions can only be linked to facilities that would be affected by a development rather those areas where the money is most needed.</p> <p>CP17 sought to retain existing local services and community facilities, this would include GP surgeries. In accordance with this policy, it may be appropriate for health facilities to receive planning contributions where a direct impact has been identified.</p>
<p>Key Issue G A Safe and Well Designed Environment</p> <p>There was support for designing out crime initiatives. Whilst Bromsgrove is considered safe there is still a fear of crime. It was suggested that night clubs and similar establishments that remain open much later should be located in town centres or other areas where noise and rowdiness at closing time will not disturb residents. Some felt too much street lighting would cause light pollution and was regarded as already being a problem in some rural areas.</p> <p>There was support for reducing conflict between car users and pedestrians through</p>	<p>The Core Strategy included a policy entitled 'High Quality Design' (CP4). It highlighted the need to reduce both crime and the fear of crime. CP3 highlighted that proposals should not unacceptably impact upon rural landscapes or local character which potentially addresses the issue of light pollution arising from future developments.</p> <p>Criteria i) of CP4 identified that motor vehicles should not dominate development</p>

<p>better design, promoting design which reflected local character and reduced signage and clutter in streets. Local distinctiveness was considered to be important with the need for a design policy framework.</p>	<p>schemes. Criterion e) of CP4 emphasised that development should contribute to an areas identity and heritage. Criterion m) highlighted the need for places to be safe, varied and uncluttered which could help reduce signage in the future.</p>
<p>Key Issue H Our Natural Environment</p> <p>Preservation of the natural environment was important to respondents and should be preserved in conjunction with social and economic objectives, but occasionally it will be necessary to resolve a conflict in favour of development. Where that happens, some countervailing improvement should be sought elsewhere.</p> <p>It has been commented that Green Belt policy is set out in PPG2 and is currently one of the few national planning policies that are reasonably clear. There was continued strong support for Green Belt policy.</p> <p>There was no clear consensus on the issue of flooding. Most people were in favour of requiring all new developments to have sustainable drainage systems. It was argued that land in flood plains should be used as public open space, or remain in agricultural use. There should be no need to build in floodplains.</p>	<p>CP5 highlighted the need to protect important habitats and pay due care to landscape types.</p> <p>No Green Belt boundary changes are proposed as shown on the key diagram. No Green Belt policy was included as it was considered that this would lead to duplication and repetition of PPG2.</p> <p>CP7 emphasised that development should preferably be located in flood zone 1. Support for the use of SUDs was also provided within the policy.</p>
<p>Key Issue I Getting Around</p> <p>The greatest support was expressed for ensuring better access to everyday facilities.</p> <p>Support was expressed for ensuring better access to Bromsgrove Town Centre and seeking the retention of essential rural facilities.</p> <p>It was identified that young people in rural areas can find it difficult to access employment because of poor transport links.</p> <p>The majority of people favoured the idea of targeting key public transport interchanges for new development. Support was also expressed for improving facilities at public</p>	<p>CP3 was supportive of proposals that will lead to an improvement in the range and quality of services available to a rural community whilst CP10 emphasised that development should be in the most sustainable locations.</p> <p>CP9 set out that the Council will support proposals that will strengthen the role of the Town Centre. This would be primarily addressed through the Town Centre AAP which is likely to contain a transport strategy for the town centre. CP17 sought to retain local services and community facilities.</p> <p>CP3 supported the expansion of existing businesses and creation of new businesses in rural areas. This may help to create accessible jobs for young people in rural communities.</p> <p>CP10 emphasised that development should be in the most sustainable locations where there are realistic public transport options.</p>

<p>transport sites.</p> <p>There was support for employers to draw up green travel plans. Although it was highlighted that they should be monitored closely to ensure that they are enforced.</p> <p>It was suggested that efforts should be made to address transport problems for the disabled and those with mobility difficulties by providing access to trains at the station, wheelchair accessible taxis, and help fund community transport.</p> <p>Other issues raised included the distance from the train station to the town centre, and the poor quality of Bromsgrove Bus Station.</p> <p>Support was expressed for ensuring better linkages between new developments, and enhancing existing facilities within and between settlements.</p>	<p>The need for travel plans on major developments was highlighted on criteria a) of CP10.</p> <p>This matter was not specifically addressed in the Core Strategy as it is reliant on public transport providers such as Worcestershire County Council and Centro. The Council will continue to engage with the relevant stakeholders over issues such as this.</p> <p>CP9 provided a hook for the Town Centre AAP. The Town Centre AAP will seek to improve accessibility in the town centre. One of the early phases of the regeneration was to improve the bus station.</p> <p>Criteria d) of CP10 emphasised that all new developments should be accessible by sustainable modes of transport.</p>
<p>Key Issue J Preserving the Past</p> <p>The majority of people expressed interest in taking action first in areas where the threat to the historic environment was greatest. Slightly less interest was expressed for seeking enhancement of existing Conservation areas before designating new ones.</p> <p>Most people were in favour of ensuring the viable reuse of locally important buildings. Slightly less support was shown towards prioritising action to protect locally important buildings that are not currently within Conservation Areas.</p>	<p>Criteria a) of CP6 only allowed development that preserves listed buildings and their setting. Criteria d) of the same policy sought to secure the preservation and/or enhancement of the character of conservation areas and their settings. The designation of additional conservation areas is not a matter for Core Strategy and would be undertaken as appropriate by the Conservation Officer.</p> <p>Criteria b) highlighted that the Council will produce a list of locally important buildings and take full account of these buildings where they may be affected by planning proposals.</p>

4. Further Issues and options (2007)

4.1 In 2007 five new issues had arisen and a decision was taken that a further Issues and Options consultation was required. The new issues were:

- New Housing Growth
- Climate Change and Renewable Energy
- Flood Risk
- Waste and Recycling
- Biodiversity

4.2 Which Consultation Methods were used?

4.3 A newsletter was developed which summarised the purpose of the consultation and the issues and options which were to be considered. A questionnaire was also designed which clearly set out the possible options for each issue. The newsletter and questionnaire were available for viewing on the Council's website which also provided further detailed information concerning the consultation. Copies of the newsletter and questionnaire were made available to view in all local libraries across the District, The Council House and the Customer Service Centre (in the Dolphin Centre).

4.4 The Questionnaire was sent out to over 200 interested parties, Statutory Consultees and stakeholders.

4.5 There was a Town Hall event 'piggybacking' the LSP annual meeting to refresh the original issues and options document and launch the new issues Consultation. The meeting was attended by over 100 individuals and representatives of interest groups. Copies of the newsletter and questionnaire were given out to all attendees.

4.6 Further efforts were made to engage the local population through the 'Piggybacking' of Street Theatre events throughout August 2007 held at the Town Centre Recreation Ground (next to Asda). There was a shared Bromsgrove District Council stall providing consultation opportunities on the Sustainable Community Strategy and Issues and Options Core Strategy. Officers were also available to engage with the public and answer any questions. Officers also gave out copies of the questionnaire to residents and encouraged them to fill them in.

4.7 Consultation meetings were also held with stakeholders and key service providers to identify relevant issues and in particular any 'showstoppers'. These included meetings with representatives from the emergency services, education, utilities, transport, housing and health service providers. Joint meetings were initially held with these groups with Redditch Borough Council and Stratford on Avon District Council principally to discuss Redditch growth issues and the proposed Community Infrastructure Levy. Later meetings were held with these groups to focus on issues specific to Bromsgrove.

4.8 What comments were received and how were these addressed?

- 4.9 In total approximately 120 responses were received in the form of questionnaire responses, letters and emails. They were from a range of groups and individuals including businesses, residents, community groups and statutory consultees.
- 4.10 The table below sets out the key issues raised during the consultation and how they were taken on board in the Draft Core Strategy (2008). Further details can also be found within Draft Core Strategy Consultation Report.

Issues Raised In The Further Issues & Options Consultation (2007)	How they were addressed in Draft Core Strategy (2008)
New Issue A New Housing Growth In terms of responses from the general public there was greatest support for new development to be concentrated within the existing ADRs and through the development of suitable brownfield sites. The strongest objections were received from the general public to the idea of releasing sufficient green belt land to cater for locally generated and in migration housing needs. Responses from statutory consultees and the private sector were supportive of housing growth highlighting that there was an insufficient supply of housing to cater for demand and this was creating greater affordability issues. Many felt that housing should be primarily located in Bromsgrove Town. Elsewhere housing should be limited to only meeting local needs.	 Many of the ADRs were identified as areas of potential growth on the key diagram. The hierarchy in CP2 sought to meet development needs on brownfield land in the first instance The Core Strategy did not propose development on Green Belt to meet housing need in the district. Housing related policies were written in a flexible manner to cater for an uncertain target, which at this point in time was due to be determined through the emerging RSS. The link between insufficient supply and rising prices was acknowledged but at this point in time the target was due to be determined through the RSS. CP16 proposed 40% affordable housing to maximise opportunities for residents to access new housing. CP2 identified that the primary location for growth would be Bromsgrove Town.
New Issue B1 Climate Change & Renewable Energy The general public gave overwhelming support for the need to adapt to climate change and mitigate its effects and in particular obtain a set percentage of energy from a renewable/low carbon source in line with National and Regional targets on developments. The private sector also acknowledged that any percentages should not exceed government targets.	 The Core Strategy included a policy on climate change (CP1) and criteria f) set out percentage targets for renewable energy production on new developments in line with Government targets at the time.

<p>There was an element of consensus from the private sector that renewable energy should only be encouraged on sites where it is economically viable.</p>	<p>Criteria f) of CP1 highlighted that viability would be considered in relation to on-site renewable energy.</p>
<p>New Issue B2 Flooding</p> <p>There was strong support for all options which aim to reduce the impact of flooding and prevent increases in flood risk including keeping water courses clear and widening and deepening rivers.</p> <p>Whilst the majority of the general public felt development should be avoided in floodplains some developers felt that provided suitable measures could be developed to minimise flooding then development in floodplains should not be ruled out.</p>	<p>The issue of flooding was addressed within CP7 and a range of measures were identified to control and manage run-off.</p> <p>CP7 set out that preferably development should be in flood zone 1 and Flood Risk Assessments would be required for proposals in flood zones 2 and 3.</p>
<p>New Issue B3 Waste & Recycling</p> <p>Local residents showed strong support for a range of methods of recycling on new developments.</p> <p>There was also a level of support from statutory consultees and the private sector for the inclusion of space for recycling and water harvesting methods within developments.</p> <p>It was noted that policies should go beyond methods of waste minimisation and recycling by choosing future locations of where waste can be managed and recycled.</p>	<p>CP4 highlighted that new developments should reduce their impact on climate change.</p> <p>Criteria d) of CP4 identified the need for measures to reduce water consumption.</p> <p>The Council was not aware of a need to identify additional sites for waste management and recycling during the plan period.</p>
<p>New Issue B4 Biodiversity</p> <p>Local residents gave significant support to ensuring developments provide some positive benefits for biodiversity and the natural environment whilst highlighting that development that harms biodiversity should be resisted.</p> <p>The option of supporting wildlife protection but balancing this against social and economic factors received the greatest level of support from statutory consultees and the private sector.</p> <p>It was highlighted viability may make it unrealistic to expect improvements in biodiversity on all sites due to the cost implications.</p>	<p>The Core Strategy included a policy entitled 'Managing Natural Assets' (CP5) which aimed to protect and enhance biodiversity habitats.</p> <p>Paragraphs 5.2 and 5.3 of the Core Strategy highlighted that the document should be considered in its entirety balancing social, environmental and economic factors.</p> <p>Paragraph 5.3 emphasises that financial viability is a key consideration in relation to all proposals.</p>

<p>It was also noted that policies should reference geological conservation, RIGS and geodiversity.</p>	<p>CP5 provided support for geodiversity and appropriate management.</p>
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5. Draft Core Strategy Spatial Vision (2008)

5.1 The vision for the District was considered to be a key overarching element that would shape policies within the Core Strategy. On this basis the Council decided to undertake a separate consultation solely on this issue prior to the publication of the Draft Core Strategy.

5.2 Which Consultation methods were used?

5.3 This consultation was launched at the LSP annual town hall event held on 9th July 2008. Approximately 200 Letters and a leaflet were sent out to consultees and the Vision was also taken to the various street theatre events held throughout the summer of 2008 in the Town Centre, Hagley, Wythall and Rubery. At these events planning officers were available to engage with local residents and explain the LDF process.

5.4 An article ran in “Together Bromsgrove”, being a magazine produced by the Council and distributed to all residents within the District, advertising this event (see appendix B).

5.5 What comments were received and how were these addressed?

5.6 Despite every effort to engage with key stakeholders and the general public no formal responses were received to this consultation. The vision was therefore included in the Draft Core Strategy without any further changes.

6. Draft Core Strategy (October 2008)

- 6.1 On 31st October 2008 the Draft Core Strategy was published with the consultation period running until 16th February 2009 aiming to ensure that all interested parties had an opportunity to get involved.
- 6.2 Which Consultation methods were used?**
- 6.3 Letters were sent to hundreds of people and organisations inviting comments on the document. An advert was also placed on the Council website, within a number of local newspapers and the Council magazine 'Together Bromsgrove' to ensure that exposure was maximised. The advert from 'Together Bromsgrove' is enclosed at Appendix C. Copies of the Core Strategy were also placed in public libraries, the Council House and the Customer Service Centre. A summary document entitled 'Have Your Say' was also published to explain the purpose and contents of the Core Strategy to enable the whole community to understand the importance of the document.
- 6.4 All local residents and interested parties were invited to a 'drop-in' event which was held at the Council House. The event ran from 10am to 7pm to give an opportunity for everyone to attend including those who were working during the day. It was well attended by the general public with people attending from different backgrounds and communities across the District. The event gave people the opportunity to discuss any issues or concerns they had directly with planning officers. Poster boards were set up highlighting the key issues such as housing, the economy and the environment and stating how they were going to be addressed. Presentations also took place throughout the day to provide a simple overview of the Core Strategy. The event was well attended with over fifty people visiting throughout the day. A photo from the 'drop-in' day is attached at Appendix D.
- 6.5 The Draft Core Strategy was published at the same time as the Redditch Core Strategy due to cross boundary issues. Therefore Council Officers attended the 'drop-in' day for the Redditch Core Strategy at Redditch Town Hall and also had display material available there on the Bromsgrove Core Strategy. Redditch officers were also invited to do the same at Bromsgrove's drop in day event.
- 6.6 The Council also contacted all the Parish Councils in the District and offered to present the Core Strategy at a Parish Meeting. Alvechurch and Hagley Parish Councils both accepted this offer and officers duly attended Parish Council Meetings to present the Core Strategy and answer any questions.
- 6.7 The Draft Core Strategy was also presented at a Local Strategic Partnership (LSP) meeting to ensure that all local stakeholders were aware of and understood the purpose of the Core Strategy.

6.8 Meetings were also held with infrastructure providers such as emergency services, the Primary Care Trust and utility companies to ensure they fully understood the implications of the Core Strategy and could therefore highlight any issues.

6.9 What comments were received and how were these addressed?

6.10 In total 127 responses were received to the consultation on the Draft Core Strategy. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District.

6.11 The table below sets out the key issues raised during the consultation and how they were taken on board in the Draft Core Strategy 2 (2011). Further details can also be found within Draft Core Strategy 2 Consultation Statement.

Issues Raised In The Draft Core Strategy (2008)	How they were addressed in Draft Core Strategy 2 (2011)
<p>The Spatial Vision</p> <p>Concerns were raised that the previous version of the vision was overly focussed on Bromsgrove Town and there was an urban bias.</p> <p>Some respondents felt that there could have been a greater emphasis on biodiversity.</p> <p>Concerns were raised that the vision did not mention support for the Districts existing employment base.</p> <p>Some felt that there could be stronger links between the spatial vision and the core policies.</p> <p>There were other issues that respondents felt were not covered or should be covered in greater detail. These included meeting the growing elderly population, biodiversity, affordable housing and the achievement of housing targets.</p>	<p>Changes were made to highlight the important role of the rural settlements in the District in terms of providing services and reducing the need to travel. Employment in rural areas was clearly mentioned in DCS2 with references to farm diversification and sustainable rural enterprises.</p> <p>Amendments were made to highlight that green infrastructure will become an integral part of the fabric of the District and one of its multi-functional benefits will be biodiversity.</p> <p>A sentence supporting existing businesses was added.</p> <p>The new version of the vision provided a clearer link to the core policies, which addressed some of the concerns raised by respondents. For example the vision identified that housing needs will be met through the delivery of an urban extension to the north and west of the Town.</p> <p>The vision referenced that the Council will have delivered the required level of housing to meet local needs including affordable housing. Meeting the needs of the elderly, biodiversity and Green Infrastructure were referenced in greater detail in the vision.</p> <p>To ensure greater clarity over what the District will be like in 2026 the overall vision was shortened. It was split up under a</p>

<p>The vision could be clearer and more transparent.</p>	<p>number of key headings. This more straightforward layout was considered to be more legible and paints a clear aspirational picture of the District for 2026.</p>
<p>CP1 Climate Change</p> <p>Several comments related to the provision of SuDs to prevent increases in flood risk and to deal with the implications of climate change.</p> <p>Many comments related to the lack of evidence to support the policy, particularly in terms of viability.</p> <p>Criterion 'e' regarding zero or low carbon energy generation was also heavily criticised on viability grounds.</p> <p>Some respondents believed other factors could be included as part of the policy, in particular, there should be more prominence given to sustainable transport and the use of public transport combined with walking and/or cycling. Some comments also related to a greater use of the natural environment and urban green spaces for mitigation against and adaptation to the impacts of climate change.</p>	<p>The benefits of SUDs were acknowledged however this matter was addressed in CP20 (Water Management).</p> <p>It was accepted that viability has to be taken into account, as a result of this, the policy set out that the Council would prepare site Masterplans or would seek to work with developers to decide the viability of meeting the equivalent level of the Code for Sustainable Homes set for social housing and the BREEAM 'very good' rating or above.</p> <p>Given that there was no firm plan about zero/low energy generation schemes in the District, it was accepted that this requirement needed revising and therefore the wording of policy was softened to support zero/low carbon where appropriate.</p> <p>Given that climate change is relevant to almost all subjects, issues that were addressed in other policies (such as policies CP14 Sustainable Transport and CP18 High Quality Design) were repeated in the Climate Change policy.</p>
<p>CP2 Distribution of Housing</p> <p>There was support for brownfield land at the top of the hierarchy although some felt the policy should distinguish between different types of brownfield land highlighting those which are unsuitable for housing development.</p> <p>Some felt that the hierarchy for determining the locations of new housing could have been clearer and also that rural exception housing and Green Belt infill should not form part of hierarchy.</p> <p>It was noted that allowing infill development of market housing in rural settlements undermined the ability to deliver affordable housing for identified local needs.</p>	<p>CP2 (Settlement Hierarchy) continued to support brownfield development but also highlighted that development of residential gardens would only be supported where strict criteria were met.</p> <p>It was recognised that the hierarchy was unclear and difficult to implement. There was therefore no hierarchy in the Draft Core Strategy 2 however CP2 set out the 4 main facets to the delivery of housing in the district.</p> <p>It was acknowledged that allowing market housing in rural settlements in the Green Belt would hamper the delivery of affordable housing. This was therefore been removed from the Core Strategy.</p>

<p>Some respondents felt that there should be some mention of general housing development in the Green Belt.</p> <p>Respondents felt that a settlement hierarchy was required to identify the amounts and types of development that would be permitted in particular settlements.</p> <p>Other respondents felt that some strategic sites should be identified.</p>	<p>The Draft Core Strategy 2 set out that the initial 4,000 homes would be delivered without altering Green Belt boundaries. CP1 set out that a Green Belt Review would take place to identify the land for approximately 3,000 homes post 2021.</p> <p>A settlement hierarchy was included in CP2 to address this issue.</p> <p>CP4A and CP4B allocated the sites that would deliver new housing.</p>
<p>CP3 Rural Renaissance</p> <p>Some felt that there needed to be some clarification over which parts of the District the policy applied to.</p> <p>There were concerns that the policy did not put enough emphasis on farming and agriculture and could do more to promote rural employment.</p> <p>Some respondents felt that all rural communities should be able to meet their own needs, irrespective of their size and therefore the policy should give greater support to enable this to be achieved. Although in contrast some felt that local needs should only be met where it accorded with sustainability criteria and there was access to public transport.</p>	<p>The policy addressing rural issues (CP13 Rural Regeneration) no longer contains a list of settlements where a rural exception policy could apply. This allowed greater flexibility and meant the policy could have a positive impact on a larger part of the District.</p> <p>CP13 supported sustainable rural enterprises, live-work units, recreation and/or tourism initiatives and the diversification of the rural economy.</p> <p>The Council agreed with the comments that rural communities should be able to meet their own needs, irrespective of their size, and therefore CP13 was amended to cover all rural parts of the District. Sustainability criteria were also included in the policy.</p>
<p>CP4 Promoting High Quality Design</p> <p>It was suggested that the policy should seek to encourage compliance with 'Secured by Design', Lifetime Home Standards and include references to CABI's Building for Life standards.</p> <p>Comments also referred to recognising the need for and value of high quality open space which plays an important part in local character and sense of place.</p> <p>The term 'climate-proofed' was also questioned a number of times, with</p>	<p>References to 'Secured by Design' and CABI's Building for Life Standards were subsequently included in CP18 High Quality Design. CP8 Homes for Elderly made reference to Lifetime Home Standards.</p> <p>CP18 was significantly revised to reflect these concerns and now places an emphasis on the wider urban design principles such as gateway locations, visual corridors and principles that help address the issues faced by the District such as following the HCA space standards and taking measures to address the potential impact of pollutions to occupants, wildlife and the environment.</p> <p>In CP18 the term 'climate-proofed' was replaced with 'climate resilient'.</p>

<p>respondents suggesting the term being defined or replaced with 'climate resilient'.</p> <p>Issues were raised in relation biodiversity, water and climate change.</p>	<p>In response it was considered that these issues were sufficiently covered under other policies including CP19 Climate Change, CP20 Water Management and CP21 Green Infrastructure.</p>
<p>CP5 Managing Natural Assets</p> <p>A number of respondents commented that the policy was too generic and should not only be more localised, but also strengthened. Some stated that there should be more in depth consideration given to geodiversity with greater clarification on the reference to the Geodiversity Action Plan.</p> <p>While some considered it important to expand the policy to protect and enhance natural assets/habitats that do not benefit from statutory protection, several private sector respondents considered it inappropriate to protect and enhance locally characteristic species unless they are statutory protected</p> <p>A number of private sector respondents believed it was unrealistic for developments to demonstrate their support for geodiversity and biodiversity and where appropriate to manage them.</p> <p>The Environment Agency thought the policy could be reinforced by making reference to the Water Framework Directive and River Severn draft River Basin Management Plan.</p>	<p>CP17 Natural Environment specifically required developments to consider and contribute towards the Worcestershire Landscape Character Assessment, the UK, Worcestershire and Bromsgrove Biodiversity Action Plan and Worcestershire Geodiversity Action Plan.</p> <p>As the Natural Environment and Rural Communities Act (2006) requires local authorities to have regard to the conservation of biodiversity in exercising their functions, it was considered necessary that the revised CP17 provided protection and enhancement to the locally important and valued natural assets.</p> <p>These matters were retained within CP17 as two of the key principles of PPS9 required plan policies to maintain and enhance, restore or add to biodiversity and geological conservation interests, and promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development.</p> <p>No changes were made in this respect as these matters were addressed under CP20 Water Management.</p>
<p>CP6 Managing Man Made Assets</p> <p>Concerns were raised that there was too much repetition from regional and national policy.</p> <p>The main criticism of the draft policy was that it appeared too restrictive to development and should promote enhancement of historic assets instead of just protecting them.</p> <p>There were also a number of comments relating to the future management of historic</p>	<p>CP16 Managing the Historic Environment was revised significantly to be more locally distinctive by providing design guidance and referencing the Worcestershire Historic Environment Record.</p> <p>The updated policy was adapted to be more supportive of the reuse of redundant historic buildings; the promotion of a positive interaction between historic sites/places and modern developments; and the encouragement of high quality contemporary developments in historic areas.</p> <p>The updated policy advocated a holistic approach to the proactive management of the</p>

assets and that this area was neglected in the previous policy.	historic environment, as well as striving to produce character appraisals and management plans for designated Conservation Areas.
<p>CP7 Water Management and Flood Protection</p> <p>Some respondents considered the previous policy merely repeated National guidance with no specific relevance to Bromsgrove.</p> <p>The Environment Agency commented that all development should be in Flood Zone 1 as development and service provision must ensure that communities and the environment are not adversely affected by flooding. Development in Flood Zones 2 and 3 should contribute positively to reducing flood risk.</p> <p>The Environment Agency also commented that watercourses should be managed and protected to ensure its biodiversity and flood control function and culverts should be re-opened/restored where possible. Flood control methods that work with the natural environment and soft engineering solutions to drainage were preferred. Other respondents considered that the policy would benefit if surface water flooding and flash flooding from ordinary watercourses were also covered.</p> <p>Some commented that the policy should have regard to relevant catchment management strategies and the Environment Agency commented that appropriate measures and infrastructure were essential and should be in place in tandem with development phases to ensure the water resources are protected. There were several comments mentioning that maintenance needs to be improved across the District in terms of drains and ditches. Ensuring there is adequate sewerage capacity and upgrading systems where required will reduce the risk of foul flooding and the associated costs and loss of amenity.</p>	<p>To address the issues faced by the District, the revised policy was divided into three main parts – water resources, flooding and water quality.</p> <p>In response to this comment, CP20 required all developments to follow the flood risk management hierarchy and where developments in high risk areas were necessary, the designs, materials and escape routes of the developments should minimise the risk(s) and loss from flooding.</p> <p>These comments helped to formulate the section of CP20 that referred to flood risk management and flood control measures.</p> <p>These matters were all addressed in the revised policy, such as a specific reference to the River Basin Management Plan and Water Framework Directives are included and phasing of development to be in line with the completion of the required infrastructure, etc.</p>
<p>CP8 Distribution of New Employment Development</p> <p>Many respondents felt that the policy could have a clearer distinction between new employment and existing employment. Some also felt that there should be a greater emphasis on existing employers in the District with policy supporting expansion plans.</p>	<p>To provide greater clarity the DCS2 included separate policies for new employment (CP11) and existing employment (CP12).</p>

<p>Conflicting views were received in relation to the retention of land for employment purposes. Some felt that the period of marketing should be extended to 24 months whereas others thought the policy was overly restrictive and could harm housing supply. A response was also received stating that they felt this part of the policy was unclear. They were not certain whether an applicant would need to meet one or all four of the criteria before a change of use of employment land would be considered favourably.</p> <p>Some felt that there should be greater emphasis on rural employment. Suggestions included homeworking and small scale office developments to help reduce the numbers of people who commute daily.</p> <p>There were also some respondents that felt the policy should contain some reference to mixed use urban extensions.</p>	<p>To allow regeneration and growth it was considered appropriate to retain a 12 month marketing period. The criteria were also amended slightly in CP11 to provide greater clarity.</p> <p>This part of the policy remained unchanged within CP11. A more strongly worded policy in favour of new rural employment was considered to be contrary to Green Belt policy.</p> <p>CP11 was amended to highlight economic development opportunities within Strategic Sites.</p>
<p>CP9 Retail and Town Centre Regeneration</p> <p>Some felt that the policy should set out a more defined retail hierarchy that highlighted the role of other retail centres in the District.</p> <p>Some felt that the policy could have gone into greater detail in relation to the types of uses to be promoted in the Town Centre. Suggestions included promoting a more varied evening economy, a vibrant café scene and youth cafés.</p> <p>Transportation issues were highlighted by a number of people and views were expressed concerning the poor links with the train station and traffic congestion.</p>	<p>The Council acknowledged the role of other retail centres and other settlements more generally needed to be addressed. CP2 Settlement Hierarchy was created to address this matter.</p> <p>CP15 Town Centre Regeneration was written flexibly to encourage a range of uses and attract inward investment without attempting to undermine the emerging Town Centre AAP.</p> <p>CP15 aimed to address these matters by improving links to the station and making highway improvements at key junctions.</p>
<p>CP10 Sustainable Transport</p> <p>Public transport was the main topic of concern regarding sustainable transport and many respondents believed the original policy failed to fully address this problem especially in rural areas.</p> <p>There was no mention of freight movement in the original policy, which was viewed as a weakness by some respondents.</p> <p>Respondents highlighted that there was not enough emphasis given in the policy to the significance of travel plans</p>	<p>CP14 Sustainable Transport placed more emphasis on this topic, fully supporting increased public transport usage as well as seeking developer contributions for investment in public transport.</p> <p>To address this issue, CP14 fully endorsed the County's Multimodal Freight Policy and considers more sustainable transport modes for moving freight, such as by rail or water.</p> <p>CP14 was updated accordingly to illustrate the importance of such plans.</p>

<p>The last major point raised by respondents was referring to the lack of mention to evidence base documents that would support the sustainable transport policy as well as the collaborative working between the Local Authority and a number of statutory consultees.</p>	<p>The updated policy highlighted the collaborative working with Worcestershire County Council and made reference to a number of evidence base documents, including; the Worcestershire Local Transport Plan, the Integrated Passenger Transport Scheme and Rights of Way Improvement Plan.</p>
<p>CP11 Open Space and Recreation</p> <p>A large number of respondents believed there was insufficient open space and recreation facilities across the District, and were in agreement that this provision needs to be greatly improved. Some considered that reference to achieving local standards should be clarified.</p> <p>There was a general concern from the private sector that provision was not always possible on smaller sites and provision should only be generated on developments that actually need open space.</p> <p>There was support to link open spaces with green corridors, but some felt green infrastructure should be explored in more detail, acknowledging intrinsic biodiversity value and also noting that not all spaces are suitable for a transport or amenity role.</p> <p>Safeguarding existing open spaces was strongly supported, but some felt that the policy could be expanded to include water corridors such as rivers, canals and towpaths; as well as more emphasis on woodland areas.</p> <p>Some considered that the policy should refer to other adopted standards or strategies (such as the Woodland Access standards, Worcestershire Countryside Access and Recreation Strategy).</p>	<p>The Green Infrastructure policy (CP21) included the quantity, quality and accessibility standards of different types of green space identified in the Open Space, Sports and Recreation (PPG17) Study. This was expected to give higher certainty to developers.</p> <p>These concerns were noted however, it is unlikely that a development would not lead to any quantity, quality or accessibility requirements nor management or maintenance of existing facilities.</p> <p>As a result the open space policy was amended greatly to incorporate the wide ranging aspects of green infrastructure under CP21. The phrase “no unacceptable conflicts in terms of their conservation requirements will result” is now included in the policy.</p> <p>A reference to safeguarding all green infrastructure assets was added to CP21. This includes water corridors and woodlands.</p> <p>It is anticipated that all the adopted standards and strategies would be taken into account in the framework; hence a reference to the sub-regional Green Infrastructure framework was included in CP21.</p>
<p>CP12 Size, Type and Tenure of Housing</p> <p>Many respondents felt that the policy should place greater emphasis on addressing the housing needs of the increasing elderly population. This included building all homes to lifetime home standards, the need for extra care developments and extensions to care homes.</p> <p>Some felt the focus on building two and three bedroom properties was overly prescriptive and could date quickly. Others felt that it was not appropriate to assume that small households wanted smaller homes and</p>	<p>To address this issue CP8 Homes for the Elderly was created in DCS2. The policy highlighted a range of suitable accommodation types and placed emphasis on building to Lifetime Home standards.</p> <p>The Council considered the Bromsgrove Housing Market Assessment provided compelling evidence for the need for smaller properties in the District. Therefore CP6 Housing Mix was not fundamentally changed</p>

<p>therefore larger homes should be built if that is what stimulates the housing market. It was considered important to address demand as well as need.</p> <p>Several people expressed views that it was not appropriate to highlight that lower density development would only be acceptable in Barnt Green. Some felt that other areas that were suitable for low density development should be identified in the policy.</p> <p>Some respondents felt that the policy should differentiate between large and small sites as generally a larger mix of houses would be expected on a strategic site to help create balanced and mixed communities.</p>	<p>although the policy did explicitly say that it was accepted that a wider mix of houses would be required on larger sites.</p> <p>To avoid this confusion the reference to Barnt Green was removed from the policy. The Council considered that identifying a list of areas would not be appropriate in a strategic document and would also be inflexible.</p> <p>CP6 in the DCS2 was altered to emphasise that a wide mix of dwellings would be required on large sites.</p>
<p>CP13 Accommodation for Gypsies, Travellers and Showpeople</p> <p>Some minor wording amendments were suggested to this policy to ensure that sites had adequate drainage and also to ensure that the policy wording could not be misinterpreted. It was also highlighted that the policy was more like a development control criteria based policy rather than a strategic policy.</p>	<p>CP9 Accommodation for Gypsies, Travellers and Showpeople was entirely re-written. The version in DCS2 was cross referenced with the development principles policy to ensure that any sites were sustainable, suitable and had sufficient infrastructure capacity.</p>
<p>CP14 The Scale of New Housing</p> <p>The main criticism of the policy was that it did not actually state what the quantum of development would be.</p> <p>Several responses were received in relation to the criteria set out for residential development. There were concerns raised that criteria e) which referred to a mix of housing types and tenures was repetition of other policies in the Core Strategy. Respondents felt that there needed to be some reference to enabling development, geo-diversity, historic assets and water infrastructure within the policy.</p> <p>The comments received in relation to windfall development were mixed. Some felt the wording was overly negative and that there should be a reference to maintaining a five year supply of sites. Whereas some felt that the policy should identify unacceptable types of windfall development.</p> <p>Some felt that the policy should identify strategic sites where a full range of house types could be provided.</p> <p>It was suggested that all of the housing</p>	<p>CP1 Future Development was created which set out the proposed housing and employment targets.</p> <p>The criticisms of the policy were noted and CP3 Development Principles was included in the DCS2. This removed the elements of repetition and provided general criteria that could be applied to all applications.</p> <p>In response to these comments CP2 Settlement Hierarchy included strict criteria for the development of private residential gardens. A reference highlighting the need to retain a 5 year supply of sites was also included in this policy.</p> <p>An additional policy CP4A Bromsgrove Town Expansion Sites was included which identified the strategic allocations.</p> <p>These comments were taken on board and</p>

related policies should be located together in the Core Strategy.	all the housing related policies in the DCS2 were between CP4 and CP9.
<p>CP15 Cross Boundary Growth</p> <p>Significant concerns were raised over the possibility of cross boundary growth. Some felt that Redditch Council should find land within their own Borough to cater for this growth. A number of reasons were identified as to why growth shouldn't take place north of Redditch. These reasons included the impact on road and water infrastructure, environmental assets, recreation facilities and the Green Belt. It was highlighted that large swathes of Green Belt land would be lost and this would result in urban sprawl and the coalescence of settlements.</p>	<p>Due to the strong public objection and the impending revocation of the RSS the issue of cross boundary growth was not addressed within DCS2.</p>
<p>CP16 Affordable Housing</p> <p>It was identified that further details on affordable tenures were required.</p> <p>Some respondents felt that the policy was written in a restrictive way considering the current economic climate.</p> <p>Some respondents queried whether the Council had robust evidence to justify the thresholds and targets set out within the policy.</p> <p>It was also noted that the threshold of five dwellings in village envelopes is meaningless as infill on this scale would not be permitted in the Green Belt.</p> <p>Respondents highlighted their general support for rural exception housing and the importance of this issue in Bromsgrove. Concerns were raised over the listing of settlements where rural exception housing could be applicable.</p>	<p>This was addressed in CP7 Affordable Housing as the policy set out a requirement for 2/3 social rented and 1/3 intermediate housing.</p> <p>However, the policy did highlight the potential for negotiation where it has been proved that 40% cannot be achieved and therefore no changes were made in this respect.</p> <p>Some modelling work was undertaken alongside the Housing Market Assessment to justify the 40% figure however further work had also been commissioned to support CP7. This will ensure that the Council has a policy that is fully justified by robust evidence.</p> <p>In response this part of the policy was removed and the Council proposed to seek a contribution from all schemes that came forward regardless of size or location.</p> <p>On this basis the Council considered it necessary to expand the guidance on this issue within CP7. To allow flexibility the list of settlements was removed from the policy.</p>
<p>CP17 Sustainable Communities</p> <p>There was considerable support for this policy and the need to create sustainable communities. Many respondents wanted the policy to be linked to other topics and expanded to include public transport, affordable housing, Green Infrastructure and rural areas.</p>	<p>Due to the support for this topic the updated policy (CP10) was expanded by not only maintaining services but supporting the provision of new and improved services. The policy supported the Sustainable Community Strategy 2010-2013, which aimed to strengthen communities by providing</p>

<p>Many respondents thought the concept of CIL would be useful but was an unrelated topic to sustainable communities and would be best suited to a separate policy or a Planning Obligations SPD.</p>	<p>accessible, localised services.</p> <p>The Council agreed with this comment and therefore created a Planning Obligations policy (CP24), and retained a separate policy focusing on sustainable communities.</p>
<p>General Comments</p> <p>Many felt that that the document lacked a clear strategy. There were concerns that the policies did not build on the vision and that generally they needed to be linked more closely. Some respondents could not see how the vision was going to be achieved.</p> <p>Concerns were raised that the document was too repetitive. Not only were similar messages being put across in different policies but some also felt the document repeated national policy.</p> <p>Some felt that there should be a strategy for ADR release within the Core Strategy.</p> <p>There was support for the inclusion of a Green Belt policy as the district is 91% Green Belt.</p>	<p>The DCS2 set out a clear strategy identifying housing and employment targets, site allocations and a settlement hierarchy.</p> <p>Repetition was removed from the DCS2 wherever possible although it was acknowledged that there was a natural overlap between certain policies. Repetition of national policy was avoided where possible to give policies a local feel.</p> <p>CP4A and CP4B allocated all of the ADRs as development sites. CP2 identified the need for the immediate release of these sites to help maintain and achieve a 5 year supply of sites.</p> <p>A Green Belt policy (CP22) was subsequently included in the DCS2 to highlight what development was acceptable in the Green Belt.</p>

7. Redditch Growth Options Consultation (February 2010)

7.1 Between February and April 2010 a special consultation was held jointly between Bromsgrove District and Redditch Borough Council on the options for Redditch cross boundary growth, based on the requirements in the West Midlands Regional Spatial Strategy Phase Two Panel Report.

7.2 What Consultation Methods were used?

7.3 At the start of the consultation period, letters/emails were sent to everyone on both Councils databases to notify them of the consultation opportunity. The letter/email included details of the events that had been organised, how to view the documents and how to submit comments on the documents.

7.4 A consultation booklet was produced which included details on the development targets for Redditch Borough and options for accommodating the required development. Three broad options for Redditch growth within Bromsgrove District were presented on a map and were:

- East of the A441
- West of the A441; and
- Adjacent to the A448

7.5 The Joint consultation officially ran between 8th February and 22nd March 2010, although this was extended until 30th April to allow some consultees further time to submit representations. A series of events were held in the following locations:

- | | | |
|-----------------------------|---------------------------|------------------|
| • 11 th February | Town Hall Redditch | (2-9pm) |
| • 13 th February | Kingfisher Centre | (9-5pm) |
| • 24 th February | Palace Theatre | (6.30pm onwards) |
| • 2 nd March | Alvechurch Baptist Church | (9am-9pm) |
| • 17 th March | Bentley Village Hall | (5-9pm) |

7.6 The events were advertised extensively in the local media. For example, an advert that was placed in the Bromsgrove Standard is attached as appendix E.

7.7 Outcome of Development Options Joint Consultation

7.8 A summary of the comments received during this consultation and the Council's response to those comments is available to view via the following link:
<http://redditch.whub.org.uk/cms/pdf/Joint%20Consultation%20Outcome%20FINAL.pdf>

7.9 In light of the revocation of RSS and emerging changes to the national planning system detailed above, the context for cross-boundary development

had changed at this stage and this was reflected in the Revised Preferred Draft Core Strategy for Redditch and the Bromsgrove Draft Core Strategy 2.

7.10 Summary of main issues and how these have been addressed

- 7.11 In total 322 representations were received on the Development Options Joint Consultation. Views were expressed by many different groups, developers, businesses and individuals who either live or work in Bromsgrove or Redditch or have an interest in the area.
- 7.12 The following paragraphs set out the key issues raised during the consultation period and how they have been addressed by officers of both authorities.
- 7.13 Alternative development locations: alternative options for the location of new development were suggested which included Studley, Beoley, Astwood Bank, Feckenham or east into Stratford-On-Avon District and the alternative option of a combination of the proposed cross-boundary strategic locations. In terms of the alternative options that were presented, Officers have established the specific reasons why these locations are not suitable for further development: these explanations can be seen in the Redditch background document to the consultation the 'Revised Development Strategy for the Emerging Core Strategy Consultation Paper' and the Sustainability Appraisal Refresh.
- 7.14 Biodiversity: concerns that new development would lead to the loss of wildlife and habitats. Officers state that an analysis of available ecological information would be carried out which will identify any constraints to development. A number of the sites that have specific environmental issues will also require an ecological assessment at the Planning Application stage.
- 7.15 Flooding: many respondents had concerns that new development would make flooding worse and that no mitigation measures would be put in place. Respondents also considered that if an area was likely to flood then this would prevent any development being located there. Officers advise that a Strategic Flood Risk Assessment (SFRA) Level 1 had been completed and that a Level 2 SFRA was being completed. This study will consider the flood risk posed to development sites and detail the mitigation measures necessary. Officers also stated that flooding issues are an important consideration but may not necessarily prohibit development.
- 7.16 Funding: many respondents misunderstood the funding procedures of new development and many believed that the Council would pay for all future development. It is clarified by Officers that the cost of development would be

borne by the developer and this also applies to the infrastructure that is required to enable the development to proceed.

- 7.17 Green Belt: concerns over the loss of the Green Belt for two reasons: it would be a loss of buffer between both Redditch and Bromsgrove and Redditch and Birmingham, and there would be an increased risk of coalescence of both Redditch and Mappleborough Green and Redditch and Bordesley. The Officer response states that the delivery of cross-boundary growth is uncertain given the revocation of the RSS and therefore further consultation will be conducted on the level of development appropriate for the Borough and District and the strategic locations for this. Officers also note that Bordesley is not a defined settlement and therefore coalescence of settlements in this location is not a relevant consideration.
- 7.18 Housing requirement: questions regarding the amount of dwellings that had been allocated to Redditch Borough as a development target up to 2026. Many respondents stated that 7000 dwellings was too high. A number of respondents particularly questioned whether this target was appropriate when considering the implications of the recession and the economic downturn. Officers state that the housing figures were set by the West Midlands Regional Spatial Strategy and the target for Redditch was based on projected need and takes account of past trends and population projections. Officers also note that the plan period runs up to 2026, therefore this takes into account peaks and troughs in the market. Officers state that the Councils would be undertaking further work to assess relevant factors/constraints before determining which site or sites should be developed. Officers advise that in light of the revocation of the RSS further consultation will be conducted on the level of development appropriate for the Borough and District and the strategic locations for this. As stated previously, the WMRSS has now been reinstated as part of the statutory development plan. However, the government has also signalled its intention to radically reform the planning system and introduce new national planning policy through the forthcoming Decentralisation and Localism Bill, which is likely to require further consultation on the appropriate level of development for the Borough.
- 7.19 Infrastructure: concerns whether infrastructure would be provided alongside any new housing development. Respondents made it clear that, amongst other things, employment and community facilities would be necessary. Officers provide the response that all necessary infrastructure would need to be in place to enable development, and an Infrastructure Delivery Plan was being progressed by both Authorities.
- 7.20 Lack of employment opportunities: concerns were raised about the lack of employment opportunities in the town and that people may commute into

Birmingham for work. Officers state that it is necessary to have employment land targets to ensure a balance between housing and employment. The employment targets allocated to Redditch were set by the West Midlands Regional Spatial Strategy and based on the projected need; however these may be revised in light of the revocation of the RSS. There is a need to identify land for a variety of employment uses. Officers also state that it is intended that new development will comprise sustainable mixed use communities enabling people to live and work locally rather than commuting to Birmingham.

- 7.21 Re-use of empty properties: comments received during consultation recommended that empty properties are used and vacant land should be utilised for housing and employment ahead of the use of ADR land or Green Belt land. Officers state that the Evidence Base studies that have been conducted ensure that all potential sites for development in Redditch Borough have been identified.
- 7.22 Strategic development locations: Many of the objections received in relation to strategic locations were unsubstantiated; however those arguments which are duly made are being investigated further.
- 7.23 A435 ADR: possibility of conflict between industrial and residential uses wildlife/protected species; flood risk; infrastructure upgrades for water supply and waste water; remote from town centre; not well integrated with existing residential neighbourhoods; lacks the scale to create balanced local communities; coalescence with Mappleborough Green and; development may lead to traffic problems on the A435.
- 7.24 Brockhill ADR/ Brockhill Green Belt and Land west of A441: potential presence of mineral deposits; may be potential for designation as SSSI; lack of existing amenities; flooding; adverse traffic implications; adverse impact on biodiversity/wildlife; adverse impact on Brockhill Woods; infrastructure upgrade required for water supply and waste water; topography; reduction of Green Belt buffer between Redditch and Birmingham and; encouraging migration from Birmingham.
- 7.25 Webheath ADR: the implications of development on the local road network; the lack of local services; the lack of local employment opportunities; the need to pump sewerage due to topography; flooding issues surrounding the site and; concern over the implications of development on wildlife located on the site. Respondents also requested that the findings of the White Young Green Report, which recommended that the three ADRs should be changed to Green Belt, be implemented.

- 7.26 Foxlydiate Green Belt and Area Adjacent to A448: the Green Belt; coalescence with other settlements; unnatural expansion of town; topography; sewerage issues requiring pumping “over the ridge”; adverse impact on setting of Hewell Historic Park; western half of the area is classified as being of moderate importance for biodiversity and the eastern part is low to moderate; further away than other options from town centre, employment opportunities, railway station and other amenities; major infrastructure improvements would be required to transport system; poorly served by public transport; Foxlydiate Wood Local Nature Reserve, Foxlydiate and Pitcheroak Woods Special Wildlife Site, Hewell Park Lake SSSI; loss of working farms; poor potential for integration with the town; greater likely dependence on car borne travel; no defensible green belt boundary and; could encourage ribbon development along A448.
- 7.27 Land East of A441: inadequate infrastructure; reduction of Green Belt buffer between Redditch and Birmingham; encourage in-migration from Birmingham; traffic congestion; flooding; topography; adverse impact on small villages and communities including coalescence with Bordesley; adverse impact on biodiversity/wildlife and; loss of amenity space.
- 7.28 Ravensbank ADR: main concern is with the Special Wildlife Site in this area.
- 7.29 Winyates Green Triangle: although the Winyates Green Triangle site was not presented as part of this consultation, Stratford on Avon District Council was consulting on their Draft Core Strategy at the same time, which did include the site. A small number of representations were submitted to RBC regarding this site during the consultation period. These representations were copied to Stratford on Avon District Council Officers for their consideration but those that were received by RBC have been summarised at the end of Appendix A for information. Since Winyates Green Triangle was identified for potential development, a Transport Assessment and Ecological Assessment have been carried out which indicate that the cost of providing access and the ecological constraints on the site are likely to mean the delivery of development on the site is unviable.
- 7.30 Many representations received on the options for cross-boundary development and some development sites within Redditch (including some ADR land) made objections to the option that was located closest to the respondent: the respondent generally supported the option that was located furthest away. Officers state that a decision on development locations will be based on technical evidence and justified arguments presented through the consultation period.

- 7.31 Topography: concerns that building in an area with steep topography would increase flooding; they were also concerned that areas with steep topography would increase the visibility of the development. Officers respond by stating that topography would be carefully considered together with other factors but may not necessarily prohibit development.
- 7.32 Non-Planning considerations: Many of the issues raised during the consultation period are non-planning considerations and could not be controlled by the policies within a Core Strategy. These issues included; property values, covenants, compensation during construction, council tax, the timing of the consultations and the responsibility of the provision of council services.

8. Draft Core Strategy 2 (2011)

- 8.1 The Draft Core Strategy 2 took into account all previous consultation exercises, national and regional policies and up to date local evidence. The document was published for consultation on January 21st 2011 for a period of 12 weeks until April 15th 2011 ensuring that all interested parties had an opportunity to get involved.

8.2 Which Consultation methods were used?

- 8.3 Letters were sent to hundreds of people and organisations inviting comments the document. An advert was also placed on the Council website, within a number of local newspapers and the Council magazine 'Together Bromsgrove' to ensure that exposure was maximised. The advert that appeared in the Bromsgrove Standard and Redditch Standard is enclosed at Appendix F. Copies of the Draft Core Strategy 2 were also placed in public libraries, the Council House and the Customer Service Centre. A summary document entitled 'Have we got it right?' was also published to explain the purpose and contents of the Core Strategy to enable the whole community to understand the importance of the document.
- 8.4 All local residents and interested parties were invited to 'drop-in' events which were held at the following times in various locations:

The Council Chamber (Burcot Lane)

Monday February 14 th	10am-5pm
Thursday February 17 th	4pm- 8pm

125 High Street North

(Formerly La Senza opposite Mothercare)

Tuesday February 22 nd	11am-4pm
Wednesday February 23 rd	11am-4pm
Thursday February 24 th	11am-4pm
Friday February 25 th	11am-4pm
Saturday February 26 th	10am-5pm

The Dolphin Centre (Reception Area)

Tuesday March 1 st	11am-4pm
Wednesday March 2 nd	11am-4pm
Thursday March 3 rd	11am-4pm

- 8.5 The 'drop-in' events were well attended by the general public with hundreds of people attending across the 10 days. These people were from different backgrounds and communities across the District. The events were held at different days and times over a 3 week period including weekends and evening in some instances. This gave everyone an opportunity to attend regardless of whether they worked full-time or were on holiday for some of the events.

- 8.6 Planning Officers attended all the events to give people the opportunity to discuss any issues or concerns they had directly. This was considered to be preferable to more formal presentations where some people may feel less comfortable asking questions. Poster boards were set up highlighting the proposed strategic allocations, developments sites and other key issues such as the economy and the environment and stating how they were going to be addressed.
- 8.7 The Council also contacted all the Parish Councils in the District and offered to hold 'drop-in' events within each Parish. Barnt Green and Wythall Parish Councils both accepted this offer and officers duly held 'drop-in' events within these settlements. These events enabled local communities to ask questions and gain knowledge and understanding of issues within the Core Strategy.
- 8.8 The Draft Core Strategy was also presented at a Local Strategic Partnership (LSP) meeting to ensure that all local stakeholders were aware of and understood the purpose of the Core Strategy.
- 8.9 Meetings were also held with infrastructure providers such as the education authority, the Primary Care Trust and utility companies to ensure they fully understood the implications of the Core Strategy and could therefore highlight any issues.

8.10 What comments were received?

- 8.11 In total 2248 individual responses were received to the Draft Core Strategy 2. In addition 2 petitions were submitted one contained 487 signatures whilst the other totalled 1016 signatures. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District. Responses were received on all elements of the document including the spatial vision and each of the 24 policies. Some comments were general and related to the document as a whole; however the majority were site specific in relation to the proposed strategic allocations and development sites within the document.
- 8.12 The responses helped to shape the Bromsgrove District Plan. The majority of the changes are minor wording changes to either remove typographical errors or provide extra clarity or explanation to policies and supporting text. Although a small number of additional policies were created reflect responses and the introduction of the NPPF. Whilst a number of concerns were raised over the proposed allocations all these sites remain in the Bromsgrove District Plan. It is considered that the concerns raised can be overcome through the application of policies within the Plan and seeking S106 contributions to invest in local infrastructure where appropriate. Full details of the comments received and officer responses to these comments are available on the Council website via the following link:

<http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/local-development-framework/core-strategy.aspx>

- 8.13 A summary of responses received to the Draft Core Strategy 2 are presented as follows:
- 8.14 The main comments received in relation to the spatial vision, each of the 24 policies and each proposed allocation have been summarised.
- 8.15 The Spatial Vision
- 8.16 *In summary the vision set out that by 2026 Bromsgrove District and its communities will have become sustainable, healthy, prosperous, safe and vibrant. People from all sections of society will have been provided with access to homes, jobs and services. The attractiveness of the District in terms of its landscape, built form and settlements will have been preserved and enhanced.*
- 8.17 Many respondents fully supported the issues identified within the vision highlighting that there was a good balance between economic, social and environmental matters although some felt it could be improved by either small tweaks or changing the emphasis slightly.
- 8.18 Some felt that the vision was not sufficiently wide ranging and should seek to achieve a better balance between new housing and employment by delivering a greater level of new employment. It was felt that this would reduce the numbers commuting out of the district to work every day. Conversely, others felt that housing targets should be increased further to cater for the needs of people wish to move out of the West Midlands conurbation and into the district.
- 8.19 As the ageing population is a key trend in the district some considered that explicit reference should be made to meeting the housing needs of the elderly.
- 8.20 Others supported minor changes including amending the end date beyond 2026, mentioning environmental connectivity and LTP3 in appropriate locations whilst also clarifying what was meant by 'rural locations'.
- 8.21 CP1 Future Development
- 8.22 *The policy sets development targets for both employment and housing in the period up to 2026 and suggests a partial review date of 2021. It is highlighted that this is could also include a full Green Belt if required.*
- 8.23 Many supported the policy, in particular the initial housing target of 4000 to 2021 and the potential for a Green Belt review to be undertaken. Although some respondents had contrasting views on what the housing target should be. Some felt that the housing target should be lower as new housing should only be for local needs whilst others felt that a much higher target was required to meet high demand.

- 8.24 Some respondents suggested that the policy should make reference to the potential for growth on the edge of both Redditch and Birmingham.
- 8.25 It was generally agreed by respondents that the plan period will need to be extended to cover a 15 year period and housing and employment targets should be based on the most up to date evidence.
- 8.26 CP2 Settlement Hierarchy
- 8.27 *The policy sets out a hierarchy of settlements in the Bromsgrove District and defines suitable development appropriate by type of settlement. The policy also highlights the 4 main facets to development in the district whilst also stating criteria for the development of garden land. The policy highlights the need for phasing throughout the plan period to ensure the maintenance of a 5 year supply.*
- 8.28 The inclusion of a settlement hierarchy was supported by all although some felt that it was based solely on population size and therefore further supporting evidence was needed. Some felt that a fourth tier should be added to the hierarchy to better define the types of settlements and there could be greater clarity over the types of development permitted within each type of settlement. Some felt the new third tier should contain Stoke Prior, Blackwell, Cofton Hackett with the fourth tier containing only small villages and the wider countryside. Some also raised concerns over the position of particular settlements within the hierarchy and the omission of Tardebigge and Hunnington. A respondent also highlighted that the it is should be made clear that the settlement hierarchy forms part of the actual policy rather than supporting text.
- 8.29 There were concerns raised that the policy effectively prohibited garden land development which can form an important part of housing supply. Some also felt it was not appropriate to address this issue within a policy entitled Settlement Hierarchy.
- 8.30 Some considered that it was not necessary to make reference to the maintenance of a 5 year supply as it was repetition of national policy whilst others considered felt that the release of development sites should be carefully managed through the plan period. It was also suggested that some of the proposed development sites should be retained as ADRs.
- 8.31 CP3 Development Principles
- 8.32 *The policy sets outs a number of criteria to ensure that developments are sustainable and can integrate into the locality without undue harm.*
- 8.33 Many respondents fully supported the policy although some felt that it was just repetition of national policy and therefore should be removed.
- 8.34 Some felt the policy could be strengthened by being more positive in relation to the natural environment, making a specific reference to the significance of

historic assets and their settings and clearly referencing walking, cycling and public transport.

- 8.35 Some also considered that that there should be an explanation in relation to the final bullet point that refers to the economic implications for the district.
- 8.36 CP4A Bromsgrove Town Expansion Sites
- 8.37 *The policy identifies the large sites around Bromsgrove Town that will accommodate a significant proportion of growth and sets out guidance for the development of these sites.*
- 8.38 There was general support for focussing a significant proportion of the growth around Bromsgrove Town although a number of comments were made about the criteria set out within the policy.
- 8.39 Some felt that criteria i to viii contained elements of repetition of either other Core Strategy policies or national policy and were also too generic.
- 8.40 Others considered that the criteria could delve into greater detail on issues such as improved bus travel, ecological connectivity, SUDs and heritage assets. It was also suggested that the policy should seek to maintain 40% open space, set a maximum limit for retail floor space and remove the terminology 'landscape geodiversity features'.
- 8.41 Generic Comments regarding Bromsgrove Town Expansion Sites
- 8.42 A number of comments were received regarding the proposed allocations around Bromsgrove Town and many of these were applicable to all of the sites. One of the major issues identified was infrastructure provision. Concerns were raised that local facilities such as schools and doctors surgeries were already full and would not be able to cope with additional capacity.
- 8.43 A number of people were concerned in relation to the impact on the highway network. Respondents thought that large scale development would lead to increased traffic and congestion and this would also lead to an increased number of accidents.
- 8.44 Some respondents queried whether there was actually a need for the additional housing whilst other were concerned about the loss of Greenfield/Green Belt land and the devaluation of property.
- 8.45 Norton Farm (BROM 1)
- 8.46 30 respondents made specific comments in relation to the Norton Farm site. Residents have highlighted that development may lead to increased flooding on Pennine Road, the loss of hedgerows and wildlife (e.g. bats and skylarks) and the removal of attractive countryside. Specific concerns were raised about the reduction of the gap between Bromsgrove, Catshill and Lickey.

Some also felt that the proposed development would take place on land that is very prominent.

8.47 Perryfields Road (BROM2)

8.48 In total 27 residents commented on the proposal for the Perryfields Road site. Some residents felt that they had already had to put up with house building for over a year which has been noisy and disruptive and therefore they had already taken their share of the growth. Concerns were raised that building up to the motorway could create an urban ghetto particularly as social housing is proposed. Some respondents felt that any development should retain the character of the area and not be greater than 2 storeys in height. Concerns were also raised about the loss of grade 1 agricultural land.

8.49 Whitford Road (BROM 3)

8.50 287 residents specifically commented on the intention to allocate land at Whitford Road for development. The main issues identified by respondents in relation to this site were increased pollution, loss of wildlife habitation and the loss of agricultural land. Strong concerns were raised in relation to traffic and congestion at the junction of Whitford Road and Fox Lane. Some also highlighted that they felt increased social housing would bring increased levels of crime, littering and anti-social behaviour which the police would struggle to cope with.

8.51 CP4B Other Development Sites Policy

8.52 *The policy identifies a range of small sites around the district, primarily in large settlements that are essential to the delivery of the strategy. Criteria are set out to guide development on these sites.*

8.53 There was general support for the policy although a number of respondents requested modifications to a number of the criteria. Some felt that there should be greater emphasis on green infrastructure and the historic environment. Others were concerned that the evidence to support 40% affordable housing and the requirement for 2 and 3 bedroom dwellings was not robust. Some felt that the reference to lifetime homes was unnecessary and should be removed.

8.54 Disappointment was expressed that all of the proposed allocations were greenfield sites. Whilst others commented that it was essential to make the best use of the development sites and therefore low density developments consisting of just large homes should not be permitted.

8.55 Concerns were raised over duplication between design policies in 4a and 4b whilst others felt further design guidance should be provided in the form of an SPD.

- 8.56 Views were expressed that in conjunction with Parish Council housing needs assessments should be undertaken in all large settlements to provide more robust evidence for the policy.
- 8.57 Generic Comments about Development Sites
- 8.58 A number of comments were received regarding the proposed development sites around the district and many of the issues raised were applicable to all of the sites. One of the major issues identified was infrastructure provision. Concerns were raised that local facilities such as schools and doctors surgeries were already full and would not be able to cope with additional capacity.
- 8.59 A number of people were concerned in relation to the impact on the highway network. Respondents thought that large scale development would lead to increased traffic and congestion and this would also lead to an increased number of accidents.
- 8.60 Some respondents queried whether there was actually a need for the additional housing whilst others were concerned about the loss of Greenfield/Green Belt land and the devaluation of property.
- 8.61 Alvechurch
- 8.62 In total 8 people made specific comments about the 2 proposed development sites in Alvechurch. There was only a very limited level of objection to the development of these sites with some feeling that the sites should remain as ADRs. Others felt it was inappropriate to allow low density development on the sites as it is important to make the best use of available land.
- 8.63 Barnt Green
- 8.64 A total of 164 responses were received in relation to the proposed development site in Barnt Green and a wide range of concerns were raised. Some felt that the development of the site would encroach into the surrounding Green Belt, create the impression of urban sprawl and reduce the strategic gap between Barnt Green and the conurbation. Some felt the proposed density was too high and would change the character of what is a low density housing area. It was highlighted by some that the settlement of Barnt Green is noted by UNESCO World Heritage Centre for its character area delimitations.
- 8.65 Highways issues were a major concern with residents highlighting dangerous crossings and junctions at Fiery Hill and Kendall End Road. Concerns were also raised about congestion and parking in the centre of Barnt Green. Residents also identified that there was no need for affordable housing in Barnt Green, the Longbridge redevelopment was nearby, the site is at risk of flooding, there is a lack of employment to support housing, village status would be lost, there would be a loss village feel and there would be a loss of

biodiversity. Some also felt that a new school would be a more appropriate use for the site.

- 8.66 Respondents also felt that development would have a harmful impact on the setting of the adjacent grade II listed building and the Barnt Green Conservation Area.
- 8.67 Some also felt that the boundary to the development site had been drawn incorrectly and should not have included the Barnt Green Inn, cricket pitch or Cherry Hill Coppice.
- 8.68 Catshill
- 8.69 A total of 42 comments were received in relation to the proposed development site in Catshill. A range of concerns were highlighted including flood risk, air pollution and the destruction of wildlife habitat. Many respondents highlighted that highway safety was a major issue. They felt that the access to the site was on a dangerous bend and on street parking on Church Road would restrict access and lead to an increased risk of accidents.
- 8.70 Frankley
- 8.71 Only a couple of respondents referred to this site within their submissions. No objections were raised in relation to the inclusion of this site although it was highlighted that the development would effectively meet the needs of residents in Birmingham. There was support for the provision of improved open space although it was highlighted that there was a history of surface water run-off causing flooding in extreme weather in the local area.
- 8.72 Hagley
- 8.73 A total of 872 responses were received in relation to the proposed development site in Hagley. It was highlighted that the proposed site is much larger than other identified development sites meaning the impact would be greater in Hagley when compared to other large settlements.
- 8.74 It was noted that Hagley had grown extensively over the past 30 years. Some felt that this had led to severe road congestion, air pollution and large busy schools. Granting permission would intensify these problems.
- 8.75 Respondents felt that the development would greatly harm local character and would lead to the loss of a village feel and community spirit. Some highlighted that Hagley would no longer be a village and would become a town.
- 8.76 Concerns were also raised about the impact on the natural environment with the loss of open fields and the potential for flooding. Respondents felt that there was no need for either office development or a hotel.
- 8.77 Ravensbank

- 8.78 In total 3 comments were received in relation to this site. It was highlighted that there are a number of vacant employment sites both in Redditch generally and also on the existing Ravensbank employment site. Respondents therefore felt that development should be delayed until there was a clear need identified or not develop the site at all.
- 8.79 Ecological concerns were raised in relation to the site. It was noted that the site is a quality wildflower meadow and is situated upstream of SSSI and nature reserve. On this basis it was felt that run-off and pollution control would need to be carefully managed.
- 8.80 St Godwalds Road
- 8.81 40 comments were received in relation to this particular site. The greatest concerns were raised in relation highway matters. Respondents highlighted that they felt traffic congestion was already unacceptable in the centre of Aston Fields would only get worse with further development. On street parking and pedestrian safety were identified as issues that were already a concern for local residents. The loss of wildlife and biodiversity habitats was highlighted as major areas of concern.
- 8.82 Wythall
- 8.83 There were a total of 613 responses in relation to the 2 proposed development sites in Wythall. However, the majority of these responses were on identical pre-printed forms that listed areas of concern and were circulated to local residents who simply added their name and address details. The issues raised were that the proposals has not been publicised clearly, brownfield sites are available for development, it would be encroachment into the Green Belt, there would be increased congestion, risk of accidents and parking problems. Respondents felt that doctors and schools would be over stretched and there would be inconvenience during building works. Respondents considered that there would be noise and air pollution and the character of the area would be changed to the detriment of all residents.
- 8.84 CP5 Neighbourhood Planning Policy
- 8.85 *The policy seeks to encourage and ensure greater public involvement in the Local Plan making process.*
- 8.86 Many organisations were supportive of the policy and a number of Parish Councils have shown an interest in developing a Neighbourhood Plan. Although some considered that a policy embracing future legislation was inappropriate.
- 8.87 Some supported the fact that neighbourhood planning would empower local communities to deliver affordable housing.

- 8.88 Others felt that the policy should highlight that any Neighbourhood Plans should conform to wider plans service providers and that the policy should also mention CIL.
- 8.89 Questions
- 8.90 This policy included 3 questions in relation to the neighbourhood planning agenda. Each question has been set out with the key responses summarised underneath.

1) What do you see as your local neighbourhood or community?

Generally respondents were of the view that they viewed their neighbourhood as the parish or settlement/village that they live in.

2) Would you be interested in helping to prepare a specific plan for your neighbourhood?

Some Community groups and Parish Councils showed a clear interest in helping to prepare a Neighbourhood Plan.

3) What do you see as the main issues affecting your neighbourhood?

The key issues raised by respondents were traffic congestion, air quality, parking, the capacity of schools and doctors surgeries and the threat of over-development.

- 8.91 CP6 Housing Mix
- 8.92 *The policy sets out that 2 and 3 bedroom properties are most needed in the District. It also highlights that minimum densities of 30 dwellings per hectare will usually be sought.*
- 8.93 There was some support for the policy although some thought it was inflexible and too prescriptive. Some felt that the Council should be trying to deliver a wider mix of homes reflecting need, demand and the existing mix of dwellings. The evidence supporting a focus on smaller dwellings was also criticised as it was argued that people tend to buy the largest property that they can afford rather than buying to meet actual minimum needs. It was considered that trying to micro-manage supply in such a way could compound affordability problems.
- 8.94 Some felt that a density target was unnecessary as they felt that planning should be design-led instead. It was considered that applying a density target could constrain the quality of a development. Someone also felt that park homes should be mentioned in the policy.
- 8.95 CP7 Affordable Housing

- 8.96 *The policy sets out the thresholds and targets for affordable housing provision whilst also providing a breakdown of the tenures and dwelling mix required. The policy also includes a rural exception site policy.*
- 8.97 There was widespread support for the policy on affordable housing although some concerns were raised. It was highlighted that the policy should be supported by up-to-date evidence. Some felt that policy was too prescriptive and should be more flexible in terms in the percentage target and the mix and tenure of affordable units to be provided.
- 8.98 It was highlighted that the policy should mention affordable rent as a type of affordable housing and that market housing could be acceptable as cross-subsidy to enable the delivery of rural affordable housing.
- 8.99 Some felt that clarity was needed as to whether the policy only applied to the net gain in dwellings whilst others felt an SPD was needed to provide further clarity and detail generally.
- 8.100 One respondent considered that the on-site threshold should be reduced further to 3 dwellings whilst a separate respondent felt that low cost market housing should be mentioned.
- 8.101 CP8 Homes for the Elderly
- 8.102 *The policy seeks to provide a wide range of housing products to meet the needs of the elderly in appropriate locations.*
- 8.103 There was widespread support for a policy on elderly housing provision although some felt that sheltered housing and residential mobile homes should be explicitly mentioned.
- 8.104 Some highlighted that the policy could be more proactive and allocate sites for this specific use as there are very limited opportunities on previously developed land.
- 8.105 Some respondents felt that justification was needed to impose the Lifetime homes standard and it was considered that this could impact on viability.
- 8.106 CP9 Accommodation for Gypsies, Travellers and Showpeople
- 8.107 *The policy provides criteria based guidance for gypsy and traveller sites to ensure future sites are in appropriate locations.*
- 8.108 Very few comments were received in relation to this policy although those who did felt that a sequential approach was inconsistent with national policy. Respondents felt that a clear set of criteria were required to guide applicants to appropriate sites in the district.
- 8.109 CP10 Sustainable Communities

8.110 *The policy seeks to ensure that new development contributes towards local infrastructure where appropriate. In addition, the policy aims to retain existing community facilities that are important to settlements.*

8.111 There was significant support for this policy although some felt that parts of the policy required further clarification. For example, it was considered unclear whether the 4 criteria under part c) of the policy were cumulative or alternative. It was also felt that criteria i) should be clarified so that it is clear that it only applies to services and facilities and not employment and 12 month time period should included under this part of the policy.

8.112 In addition some felt that the policy should set out a full list of the services and facilities that could be relevant under this policy.

8.113 Some respondents highlighted that any contributions sought should be directly related to the development. Others felt that an Infrastructure Delivery Plan was needed to support the policy.

8.114 CP11 New Employment Development

8.115 *The policy sets out the types of employment opportunities that will help to broaden the economic base of the District and strengthen the local economy.*

8.116 There was support for the policy although some felt that the policy was too focussed on traditional types of employment (B class uses) when other employers such as hotels and care homes should be mentioned.

8.117 It was highlighted that the policy should mention the employment target as well as explicitly highlighting the sites where employment development is permitted. Some felt the role of previously developed land in the Green Belt should also be recognised.

8.118 One respondent felt that the policy should include reference to the protection of biodiversity and the natural environment.

8.119 CP12 Existing Employment

8.120 *The policy seeks to protect and promote existing employment sites in the District.*

8.121 There was support for the policy although some felt further clarification was required in places and other felt that the policy could be improved further.

8.122 Firstly some respondents felt that it was unclear whether the policy only related to designated employment sites on the key diagram all whether it related to all employment sites in the district. Clarification was also sought over whether all or just one of the criteria needed to be met when considering a change of use from employment to housing.

- 8.123 It was considered by some respondents that the policy could be more flexible in allowing both economic development and also re-use for housing.
- 8.124 Some felt that the Employment Land Review should be updated and also that the policy should make greater reference to transport infrastructure.
- 8.125 CP13 Rural Regeneration
- 8.126 *The policy seeks to encourage sustainable development of an appropriate scale in rural communities that will deliver social and economic benefits.*
- 8.127 There was widespread support for a policy addressing the rural parts of the district although some felt that the authority's stance on Green Belt policy undermined the ability to achieve rural regeneration.
- 8.128 Some respondents felt that other issues could be mentioned within the policy including historic farmsteads, broadband, large scale leisure and tourism, sport and the protection of landscape character.
- 8.129 It was considered by some respondents that part d) of the policy should make a specific reference to the potential for cross-subsidy from market housing.
- 8.130 Some felt clarity was required on a couple of issues. One respondent felt further detail as required on the types of buildings that are suitable for conversion whilst another felt the term 'small scale renewable energy projects' should be defined.
- 8.131 It was also highlighted that the use of the term 'regeneration' was inappropriate in relation to the rural areas of Bromsgrove District. The respondent highlighted that regeneration is a term associated rundown urban areas and therefore not applicable in this instance.
- 8.132 CP14 Sustainable Transport
- 8.133 *The policy seeks to ensure sustainable transport opportunities are maximised and transport assessments are undertaken for all major schemes.*
- 8.134 There was widespread support for the policy although concerns were raised over the deliverability of the policy with the District Council being reliant on other bodies such as the County Council who have been making cuts to bus services.
- 8.135 Some felt that the policy could be expanded to mention proposed changes to the rail network including the new Bromsgrove Station, improvements to the cross-city line and better links between the train station and Bromsgrove Town Centre. Other respondents were keen for a reference to be included that supported new and expanded rail station car parks.

- 8.136 Some respondents sought a definition for the term ‘major developments’ that is used within the policy and also requested that LTP3 be mentioned in the policy.
- 8.137 CP15 Town Centre Regeneration
- 8.138 *This policy sets a framework for the regeneration of the Town Centre in the context of an Area Action Plan that will deliver economic, social and environmental benefits for the town.*
- 8.139 There was widespread support for the regeneration of the town centre with very few changes actually sought to the policy.
- 8.140 Some felt the policy should go into greater detail on the evening economy, mention sport and include the naturalisation of the Spadesbourne Brook. It was also considered that a specific housing target for the town centre would also be beneficial.
- 8.141 Several respondents referred to specific development sites with some seeking improvements to the existing sports hall and support for the Sainsbury’s development.
- 8.142 CP16 Managing the Historic Environment
- 8.143 *This policy seeks to ensure the sensitive and innovative management of the Districts man-made historic assets and recognises the role of historic assets as a catalyst for regeneration.*
- 8.144 There was support for the policy however some respondents felt that the policy could be improved. It was argued that the approach to design was too prescriptive and a contemporary approach is not always the right approach.
- 8.145 Some respondents considered that the policy should make greater reference to the Historic Environment Assessment, Historic Landscape Characterisation, Conservation Area Appraisals and the West Midlands Farmsteads and Landscape Project. There was support for the inclusion of a local list and some felt that there should be a greater emphasis on the re-use of buildings and appropriate climate change measures.
- 8.146 CP17 Natural Environment
- 8.147 *The policy sets out a range of principles to safeguard the local distinctiveness of the District and ensure the natural environment is managed in a better way.*
- 8.148 There was generally strong support for the policy although some did suggest that the policy merely repeated national policy.
- 8.149 Some respondents highlighted ways of improving the policy. These included providing greater protection ancient woodland, mentioning BAP habitats,

referencing the County Council's Historic Landscape Characterisation and generally having greater focus on the need for environment improvement.

8.150 It was also identified that minor wording changes could make a major difference in terms of the strengthening the policy. These included replacing 'safeguarding' with 'maintain and enhance' and adding 'multi-functionality' where appropriate. A respondent also considered that a supporting map highlighting important features would also provide clarity to the policy.

8.151 CP18 High Quality Design

8.152 *The policy set a number of principles to safeguard the local distinctiveness of the District and ensure a high quality, safe and distinctive design throughout developments.*

8.153 There was widespread support for the policy in principle although some felt that improvements could be still made. Some concerns were raised in relation to the inclusion of references to Secured by Design, Building for Life and the West Midlands Sustainability Checklist. Respondents felt that some of these documents may change or be deleted overtime and therefore should not be referenced in a long term document and therefore it could be prudent to rely on building regulations for some of these issues. It was also highlighted that the Sustainability Checklist was developed and funded by Advantage West Midlands who no longer exist and therefore the status of checklist is now questionable. It was highlighted that a locally developed checklist would be preferable.

8.154 Some respondents considered that the policy was too ambiguous and should be supported by a Design Guide SPD to provide greater clarification. In particular it was felt that the reference to public art should be explained and more clearly evidenced and the final bullet point of the policy could be expanded upon to provide clarification.

8.155 Some felt additional issues could be addressed within the policy. These included contaminated land and ancient woodland.

8.156 CP19 Climate Change

8.157 *The policy sets out a number of principles to mitigate the causes of climate change from developments and ensure developments are able to adapt to the impacts of a changing climate.*

8.158 The policy was supported by some respondents although others felt that it was merely a repetition of national policy. The references to BREEAM and the Code for Sustainable Homes were considered to be too prescriptive and lacking in evidence by some and therefore some respondents felt the issue should be addressed through Building Regulations.

- 8.159 It was highlighted that expecting development to connect to zero-carbon schemes is onerous and unjustified. There were concerns raised that the policy could have implications on development viability.
- 8.160 Some respondents felt that there should be clear cross-referencing with other policies in the document (CP14, CP20 and CP21) and the benefits of native woodland should also be mentioned in the policy.
- 8.161 CP20 Water Management
- 8.162 *The policy highlights a set of principles to ensure sustainability of the water environment and safeguard developments from the risk of flooding.*
- 8.163 There was strong support for this policy but some respondents felt that the policy could be improved further. For example, some felt that stronger wording was needed to ensure deliverability whilst others felt that identifying areas that suffer from different kinds of flooding would be beneficial.
- 8.164 Some felt that the achievement of BREEAM standards and the Code for Sustainable Homes required additional evidence and should be addressed by Building Regulations instead. Concerns were raised that the additional costs of these standards could impact upon viability.
- 8.165 Other improvements sought included encouraging developers to engage with the Environment Agency and Local Authority, reference native woodland as water risk management tool and also the need to mention the benefits to the natural environment.
- 8.166 CP21 Green Infrastructure
- 8.167 *The policy identifies a set of principles to safeguard the delivery of a high quality multifunctional green space within and beyond the district boundaries.*
- 8.168 There was support for a policy on green infrastructure although some felt improvements and changes should be made to the policy. Concerns were raised over the approach to planning contributions as it was considered by some that new development should not make up for existing deficiencies in open space provision.
- 8.169 Comments were also made about the accessibility standards. Some felt that it should be clear that these form part of the policy. Whilst others commented that they were excessive and there was a suggestion that the woodland access standards should be used. Concerns were also raised in relation to the lack of credible evidence in relation to outdoor sports facilities.
- 8.170 It was suggested that the policy wording could be improved to secure a better integration of green infrastructure and this could include the use of maps and reference to multi-use sites.

8.171 Respondents also highlighted that the policy should refer to all developments and not just housing and that a reference to woodland creation could also be included.

8.172 CP22 Green Belt

8.173 The policy seeks to protect the Green Belt in Bromsgrove District and sets out the type of development which would be appropriate.

8.174 There was support for a Green Belt policy although some respondents felt that the policy should be deleted as it repeated national policy.

8.175 Some felt that the policy could be improved through more flexible wording to allow more housing in the Green Belt including small-scale allocations to meet local needs.

8.176 Some respondents felt that further detail could be provided about the acceptability of conversion schemes and also the kinds of very special circumstances that could be deemed acceptable.

8.177 There was support from some respondents for the inclusion of some major developed sites in the Green Belt whilst others felt that sport should be explicitly mentioned in the policy.

8.178 CP23 Health and Well-Being

8.179 The policy seeks to improve the quality of life and well-being of Bromsgrove residents by promoting active, healthy lifestyles as well as improving access to health and leisure facilities.

8.180 There was a mixed response to the policy with strong support from some respondents who considered that supporting healthy lifestyles to be an important planning matter. Whereas others considered that the policy should be deleted as it repeated national policy and in some cases fell outside of the remit of planning.

8.181 Some felt that the policy could be improved through a clearer connection with green infrastructure and its health benefits. A reference to sport was also requested.

8.182 CP24 Planning Obligations

8.183 The policy seeks to secure developer contributions towards different types of infrastructure provision.

8.184 There was support for the development of a CIL in the district although it was highlighted that economic viability was fundamental.

8.185 Concerns were raised about the second paragraph of the policy where it states that all forms of development should aim to benefit the local community

taking account of its needs and aspirations. It was considered that this goes beyond the realm of what is permitted by relevant legislation.

8.186 Some felt the policy could be written in a more flexible way highlighting that contributions could go directly to local communities or Parishes as deemed appropriate. It was also considered necessary by some to highlight that any money should be spent within 5 years and if not returned to the developer.

8.187 There were requests for additional information to be included in the policy. Several respondents felt that Green Infrastructure should be highlighted as a possible area for contributions. It was also felt by some that the New Homes Bonus and Tax Increment Financing could also be mentioned.

8.188 Other Comments

Concerns were raised that the document did not sufficiently address the pollution. It was felt by some that there should be policies on air pollution, noise pollution and land contamination.

8.189 How were these addressed in the Bromsgrove District Plan (BDP)?

8.190 In the Proposed Submission version of the BDP there were a number of minor changes to policies to reflect consultation feedback from the DCS2 and this also led to a couple of additional policies being created. Whilst many of the policies were similar to the previous versions in the DCS2 the names and numbers of policies in some cases has changed. For clarity the former policy name within the DCS2 is provided in brackets where appropriate. All of the main changes to policies are highlighted below.

8.191 Spatial Vision

8.192 *In summary the vision sets out that by 2030 Bromsgrove District and its communities will have become sustainable, healthy, prosperous, safe and vibrant. People from all sections of society will have been provided with access to homes, jobs and services. The attractiveness of the District in terms of its landscape, built form and settlements will have been preserved and enhanced.*

8.193 In accordance with the responses received the end date of the plan has been extended from 2026 to 2030 and greater emphasis is now placed on sustainable modes of transport and reducing car usage. In support of comments received a reference to improved environmental connectivity has been included.

8.194 Respondents queried what was meant by the term 'rural locations'. This terminology has now been removed from the vision and replaced with 'other locations' to provide greater clarity.

8.195 Some respondents requested a more explicit reference to meeting the housing needs of the elderly. However, the vision in DCS2 already

highlighted that housing need will continue to be met and schemes would be delivered to meet the elderly population. Therefore no changes were made in this respect.

8.196 BDP1 Sustainable Development Principles (CP3)

8.197 *The policy sets out a number of criteria to ensure that developments are sustainable and can integrate into the locality without undue harm. The policy also includes a presumption in favour of sustainable development to ensure conformity with the NPPF.*

8.198 Whilst many respondents supported the policy some felt it should be deleted as it repeated national policy. The policy has been retained as it is considered that the policy draws on a wide range of planning issues to provide a clear and concise list of criteria against which all applications can be assessed. It is considered that the policy adds detail to the guidance within the NPPF.

8.199 Some felt the policy could be strengthened to make it more deliverable and also be more positive in relation to the natural environment, making a specific reference to the significance of historic assets and their settings and clearly referencing walking, cycling and public transport. Some also considered that that there should be an explanation in relation to the final bullet point that refers to the economic implications for the district. Some minor wording changes were included to add further clarity and strength to the policy but some of the wording changes were considered to overlap and repeat other policies. The wording 'In considering all proposals for development regard will be had to the following' has not been amended as stronger wording could be considered too onerous as all of the criteria will not be relevant to all applications.

8.200 The policy has been expanded significantly to include a version of the model policy on the presumption in favour of sustainable development to ensure conformity with the NPPF.

8.201 BDP2 Settlement Hierarchy (CP2)

8.202 *The policy sets out a clear settlement hierarchy for the District that also broadly outlines the types of development that could be acceptable in each settlement type to maintain viability and meet local needs. The policy also highlights the four main facets to housing delivery in the District.*

8.203 Concerns were raised that the settlement hierarchy was not supported by evidence. This matter has been addressed with publication of a background paper which ranks settlements based on the availability of a wide range of services and facilities available locally. This justifies retention of 3 tier hierarchy even though some respondents felt a fourth tier should be added. However it is considered that this approach is entirely robust as some of the smaller settlements have a larger population and greater range of services and facilities than the three identified allegedly higher order settlements. It is

however considered that there is sufficient flexibility within the policy to allow appropriate development to come forward in the settlements not washed over by Green Belt. Furthermore to define what types of development that would be allowed in each settlement type was considered too inflexible in a strategic level document and following the publication of the NPPF being prescriptive about the types of allowable development would not appear to be in conformity with the presumption in favour of sustainable development.

- 8.204 Some people felt the settlements of Tardebigge and Hunnington should be added to the hierarchy although no changes have been made in this respect. These are considered to be very small villages that are poorly defined. It is considered unrealistic to name every small village within the settlement hierarchy particularly where they have virtually no services or facilities.
- 8.205 In response to concerns raised, the settlement hierarchy is now directly referred to in the policy and clearly forms part of the policy rather than the supporting text.
- 8.206 The issue of development on garden land has been moved from this policy and is now addressed in BDP19 High Quality Design. Respondents highlighted that it was not appropriate to include the development of garden land within a policy entitled Settlement Hierarchy and the Council agrees with this view.
- 8.207 BDP3 Future Housing and Employment Development (CP1)
- 8.208 *The policy sets development targets for both employment and housing in the period up to 2030 and suggests a partial review date of 2023. It is highlighted that this will include a full Green Belt Review.*
- 8.209 In accordance with the responses received the plan period has been extended so that in excess of a 15 year period is covered. In addition the Council has amended the housing and employment targets so that they are based on the most up to date evidence as suggested by some respondents. The key evidence for this is the Worcestershire Strategic Housing Market Assessment 2012 (SHMA) and the Employment Land Review Update (2012).
- 8.210 BDP4 Green Belt (CP22)
- 8.211 *The policy sets out the type of development which would be appropriate in The Green Belt and sets a time frame and framework for a Green Belt Review.*
- 8.212 Most of the comments on Green Belt came from other policies, such as the development sites and employment policies. Comments on Green Belt were contradictory, a considerable amount of comments considered that the Council should do the Green Belt review now to ensure sufficient land is available for development, which should also include leisure development and allow businesses in the Green Belt to expand. At the same time, a lot

considered that Green Belt should be protected from developments and some suggested that several designations of Areas of Development Restraints should be changed to Green Belt. There were also some suggestions to provide further protection for the Green Belt, for example, to remove the right to retrospective planning and give higher priority to the openness of Green Belt. There were also comments on the policy repeating PPG2. The majority of changes to this policy are due to the changes introduced through the NPPF and the need for a Green Belt Review as identified within the SHLAA.

8.213 BDP5A Bromsgrove Town Expansion Sites (CP4A)

8.214 The policy identifies the large sites around Bromsgrove Town that will accommodate a significant proportion of growth and sets out guidance for the development of these sites.

8.215 A wide range of consultation responses were received in relation to the policy and in particular the choice of site allocations. Across all the sites a range of issues were raised including traffic congestion, lack of infrastructure, loss of greenfield land, impact on biodiversity and pollution. However, it is considered that many of the matters can be addressed through the implementation of this policy, for example the policy seeks to retain important biodiversity features and implement a strategy to manage traffic. Planning contributions will be sought where appropriate to deliver new and improved infrastructure. It is acknowledged that development will result in the loss of greenfield land however there is a lack of suitable brownfield alternatives and there is a high level of housing need in the district. It is also important to note that the sites were identified as Areas of Development Restraint (ADR) in the Local Plan for future development meaning that these sites are not in the designated Green Belt.

8.216 Wording changes were also sought by some respondents to this policy. Some felt that criteria i to viii contained elements of repetition of either other Bromsgrove District Plan policies or national policy and were also too generic. Detailed local assessments have identified issues that are particularly relevant to the urban extensions and Officers therefore consider that it is important that these issues are addressed and dealt with strategically by the developers of BROM1, BROM2 and BROM3.

8.217 Other respondents considered that the criteria could delve into greater detail on issues such as highway improvements, ecological connectivity, SUDs and heritage assets. It was also suggested that the policy should seek to maintain 40% open space, set a maximum limit for retail floor space and remove the terminology 'landscape geodiversity features'. The Council made some of the proposed changes in relation to highway improvements and SUDs however some of the proposals were considered to create unnecessary duplication with other policies in the plan. The Council considered the imposition of a 40% open space target and a retail target was inflexible and could constrain development.

8.218 BDP5B Other Development Sites Policy (CP4B)

8.219 *The policy identifies a range of small sites around the district, primarily in large settlements that are essential to the delivery of the strategy.*

8.220 A wide range of consultation responses were received in relation to this policy and in particular the choice of site allocations. Across all the sites a range of issues were raised including traffic congestion, lack of infrastructure, loss of greenfield land, impact on biodiversity and air quality. It is considered that many of the matters can be addressed through the implementation of this policy, for example, the policy seeks to address noise and pollution issues, retain important biodiversity (as part of Green Infrastructure) and implement a strategy to manage traffic. Planning contributions will be sought where appropriate to deliver new and improved infrastructure. It is acknowledged that development will result in the loss of greenfield land, however, there is a lack of suitable brownfield alternatives and there is a high level of housing need in the district. For the above reasons no changes were made in relation to the development sites chosen to be located in the Plan.

8.221 Respondents requested wording changes to the policy however due to the fact that so many of these sites have now received planning permission it was considered unnecessary to include criteria for the development of these sites.

8.222 Concern was raised regarding the loss of certain assets, such as the cricket pitch and Barnt Green Inn on Barnt Green development site, which was never the intention but was not clear in the Plan. Therefore the Barnt Green development site map has been amended to clarify the specific developable area.

8.223 Submissions for alternative sites were received, predominately for Green Belt sites which would be considered in the event of a Green Belt review. The Council will continue to gather information from developers regarding realistic capacities and delivery time scales for sites and update the SHLAA and subsequent versions of the Plan accordingly.

8.224 RCBD1 Redditch Cross Boundary Development

8.225 *The policy seeks to deliver 3,400 homes across two sites to meet the housing needs of Redditch Borough. The policy also includes criteria to influence the development of these sites.*

8.226 Some respondents felt that the Plan should address the cross-boundary housing needs of Redditch Borough. Following the completion of the Worcestershire Strategic Housing Market Assessment (SHMA) and an update of the Redditch Strategic Housing Land Availability Assessment (SHLAA) it was agreed that there was insufficient land capacity within Redditch Borough and both authorities would work jointly under the duty to co-operate to address this issue. This led to the addition of this policy.

8.227 BDP6 Infrastructure Contributions (CP24)

8.228 *The policy seeks to secure developer contributions towards different types of infrastructure provision.*

8.229 From previous consultations there was support for the development of a CIL in the District, although it was highlighted that economic viability was fundamental. With Consultants being employed to address viability it is considered that this concern will be satisfactorily addressed.

8.230 Concerns were raised about the second paragraph of the policy where it states that all forms of development should aim to benefit the local community taking account of its needs and aspirations. It was considered that this goes beyond the realm of what is permitted by relevant legislation; however the Council considers that most developments provide direct benefits through the creation of new homes or jobs and therefore the policy does not place an unreasonable burden on applicants.

8.231 Some felt the policy could be written in a more flexible way highlighting that contributions could go directly to local communities or Parishes as deemed appropriate. It was also considered necessary by some to highlight that any money should be spent within 5 years and if not returned to the developer. The Council recognises the validity of the points raised but considers these matters should be addressed within the CIL as the document progresses.

8.232 There were requests for additional information to be included in the policy. Several respondents felt that Green Infrastructure should be highlighted as a possible area for contributions. It was also felt by some that the New Homes Bonus (NHB) and Tax Increment Financing (TIF) could also be mentioned. The Council agree that Green Infrastructure should be included as a possible area for contributions and have added this to the policy. The Council considers that NHB and TIF are not planning obligations and therefore have not included references to these in this policy.

8.233 BDP7 Housing Mix and Density (CP6)

8.234 *The policy sets out that 2 and 3 bedroom properties are most needed in the District. It also highlights that appropriate densities will be sought that lead to a high quality design outcome.*

8.235 Some felt that the Council should be trying to deliver a wider mix of homes reflecting need, demand and the existing mix of dwellings. The evidence supporting a focus on smaller dwellings was also criticised as it was thought that people tend to buy the largest property that they can afford rather than buying to meet actual needs. It was considered that trying to micro-manage supply in such a way could compound affordability problems. The Council considers that there are already a high proportion of larger dwellings in the district therefore it is essential to build smaller dwellings to meet the needs of first time buyers and people of retirement age. It is considered that the policy is

sufficiently flexible to deliver a wide range of dwelling types across the plan period and therefore no changes are proposed.

8.236 Some respondents felt that a density target was unnecessary as they felt that planning should be design-led instead. It was considered that applying a density target could constrain the quality of a development. Whilst officers feel that that it is essential to make prudent use land to minimise Green Belt release in the future, it is considered that on reflection a design led approach is preferable. The policy has therefore been amended to remove the density target.

8.237 BDP8 Affordable Housing (CP7)

8.238 The policy sets out the thresholds and targets for affordable housing provision whilst also providing details of the tenures and dwelling mix required.

8.239 It was identified by some respondents that the policy should be supported by up-to-date evidence. Following the completion of the Affordable Housing Viability Assessment by Levvels this matter has been addressed and the policy has been amended to reflect this robust and up to date evidence.

8.240 Some felt that the policy was too prescriptive and should be more flexible in terms of the percentage target and the mix and tenure of affordable units to be provided. The Council acknowledges that it is important to be flexible with the tenure and mix to ensure that the types of homes needed most in a community are delivered. Therefore the tenure mix and dwelling sizes is now proposed to be negotiated on a site by site basis. The wording in relation to the 40% target has also been amended to state 'up to'.

8.241 It was highlighted by some respondents that the policy should mention affordable rent as a type of affordable housing. The Council agreed with this comment and a reference to affordable rent has been added.

8.244 Some felt that clarity was needed as to whether the policy only applied to the net gain in dwellings whilst others felt an SPD was needed to provide further clarity and detail generally. The Council considered that the policy already provided clarity on the issue of net gain and generally the policy provided sufficient detail so that an SPD will not be required in the future.

8.245 One respondent considered that the on-site threshold should be reduced further to 3 dwellings whilst a separate respondent felt that low cost market housing should be mentioned. The Council considers that reducing the threshold further is not practical for the RSLs and could impact on viability. It is noted that annex 2 of the NPPF specifically states the low cost market housing is not a form of affordable housing for planning purposes. No changes have been made in relation to these comments.

8.246 BDP9 Rural Exception Sites

8.247 *The policy seeks to deliver affordable housing in rural areas within the Green Belt where a need has been identified.*

8.248 The issue of rural exception housing was previously addressed within the affordable housing policy but it has now been given greater prominence in a policy of its own so greater detail can be added. This reflects the importance of this method as a way of delivering affordable housing and the fact that Council no longer intends to develop an Affordable Housing SPD. Consultation feedback from the DCS2 and the Draft Affordable Housing SPD (November 2009) highlighted support for a policy on this issue.

8.249 Some respondents felt that market housing could be acceptable as cross-subsidy to enable the delivery of rural affordable housing. The possibility for cross-subsidy on exception sites is now included within the policy.

8.250 BDP10 Homes for the Elderly (CP8)

8.251 *The policy seeks to provide a wide range of housing products to meet the needs of the elderly in appropriate locations.*

8.252 There was considerable support for this policy during the consultation as it demonstrated that the Council recognised the need to understand and plan for an ageing population. There were some concerns about the introduction of 'Lifetime Homes' standards from developers; however, these measures are seen as essential to meet the needs of the elderly and assisting independent living at home. 'Lifetime Homes' standards were taken into account as part of the Affordable Housing Viability Study (2012). There was also a desire from developers to provide elderly accommodation outside defined settlements; however this would contradict Green Belt policy. As outlined above no notable changes were made to this policy.

8.253 BDP11 Accommodation for Gypsies, Travellers and Showpeople (CP9)

8.254 *The policy provides criteria based guidance for gypsy and traveller sites to ensure future sites are in appropriate locations.*

8.255 Very few comments were received in relation to this policy although those who did felt that a sequential approach was inconsistent with national policy. Respondents felt that a clear set of criteria were required to guide applicants to appropriate sites in the District. The Council agreed that the sequential approach is not appropriate and the policy was amended accordingly.

8.256 BDP12 Sustainable Communities (CP10)

8.257 *The policy seeks to ensure that new development contributes towards local infrastructure where appropriate. In addition, the policy aims to retain existing community facilities that are important to settlements.*

8.258 There were only a few comments received in relation to this policy, and those that did respond were generally in support, especially regarding the improvement of existing facilities and resisting their loss. The small number of concerns related to minor wording changes, which have been amended where appropriate. There was a suggestion that Green Infrastructure should be included as part of sustainable communities; however, this topic is covered in sufficient depth within BDP24 and the Plan should be read as a whole.

8.259 BDP13 New Employment Development (CP11)

8.260 The policy sets out the types of employment opportunities that will help to broaden the economic base of the District and strengthen the local economy.

8.261 Consultation responses identified that there was support for the policy although some felt that the policy was too focussed on traditional types of employment (B class uses) when other employers such as hotels and care homes should be mentioned. The Council notes that the policy already refers broadly to economic development and therefore considers it is not overly focussed on B class uses. On this basis no changes are proposed to policy in relation to this issue.

8.262 It was highlighted that the policy should mention the employment target as well as explicitly highlighting the sites where employment development is permitted. In response the Council has included the employment target in the supporting text. It should be noted that the Proposals Map highlights main employment areas but it is considered unrealistic to highlight every possible location where some employment might be acceptable.

8.263 Some respondents felt that the role of previously developed land in the Green Belt should also be recognised. The Council notes that the NPPF supports redevelopment of brownfield land within the Green Belt where no additional harm is caused and therefore this matter is addressed within policy BDP4.

8.264 One respondent felt that the policy should include reference to the protection of biodiversity and the natural environment however the Council notes that these matters are addressed in BDP21. The Plan should be considered holistically and therefore no changes are proposed in relation to this issue.

8.265 BDP14 Designated Employment (CP12)

8.266 The policy seeks to protect and promote existing employment sites in the District.

8.267 There was a general positive consensus to this policy and support for the maintenance and promotion of existing employment provision across the District. There were some concerns regarding the latter part of the policy concerning the loss of employment sites. A number of responses felt the requirements for non-employment developments were too rigid. In light of this and in order to conform to the NPPF, an extra paragraph has been added to provide more flexibility. Each proposal will be based on its own merits and

where it can be justified that the criteria in the policy cannot realistically be applied, alternative uses of land and buildings will be considered.

8.268 BDP15 Rural Renaissance (CP13)

8.269 The policy seeks to encourage sustainable development of an appropriate scale in rural communities that will deliver social and economic benefits.

8.270 There was a positive consensus to the policy for the support of rural regeneration and the social and economic needs of rural communities. The negative responses were in regard to the lack of support for commercial expansion and development in the Green Belt. The Council cannot write policy contrary to Green Belt policy and it is for an applicant to suggest any very special circumstances as part of a planning application. There was also a response suggesting a particular premises should be considered a Major Developed Site. However, Major Developed Sites in the Green Belt are not specifically referenced in the NPPF and therefore no changes were made in this regard.

8.271 There was a response that greater attention should be given to the character, condition and role of farmsteads, which has been applied to the new policy. There was a concern on the definition of small scale renewable energy developments, which has been added to the glossary. A number of small scale wording changes have been considered and the policy updated accordingly.

8.272 BDP16 Sustainable Transport (CP14)

8.273 The policy seeks to ensure sustainable transport opportunities are maximised and transport assessments are undertaken for all major schemes.

8.274 There was widespread support for the policy although concerns were raised over the deliverability of the policy with the District Council being reliant on other bodies such as the County Council who have been making cuts to bus services. The Council acknowledges the cuts being made however the Council will continue to engage with relevant stakeholders and seek improvements through developer contributions.

8.275 Some felt that the policy could be expanded to mention proposed changes to the rail network including the new Bromsgrove Station, improvements to the cross-city line and better links between the train station and Bromsgrove Town Centre. This supporting text for the policy has been expanded to address these issues but they are not included within the policy as it is considered that a policy is not required to facilitate these improvements.

8.276 Other respondents were keen for a reference to be included that supported new and expanded rail station car parks. However, no changes will be made in this respect as this would be contrary to LTP3 which highlights that increased parking can encourage greater use of the car for short journeys.

8.273 Some respondents requested that LTP3 be mentioned in the policy. References to LTP3 have been included where appropriate.

8.274 BDP17 Town Centre Regeneration (CP15)

8.275 This policy sets a framework for the regeneration of the Town Centre that will deliver economic, social and environmental benefits for the town. A number of key sites are also identified.

8.276 There was widespread support for the regeneration of the town centre and the policy has been expanded to highlight the importance of the issue, particularly as the Town Centre AAP is no longer proposed.

8.277 A specific housing target for the town centre was proposed by some respondents. However, it would be difficult to estimate the potential capacity where mixed use opportunities exist and the benefits of such a target are not clear. Therefore a housing target has not been included in the policy.

8.278 Some felt the policy should, go into greater detail on the evening economy, mention sport and include the naturalisation of the Spadesbourne Brook. Many of these matters have been addressed through minor wording changes.

8.279 Several respondents referred to specific development sites with some seeking improvements to the existing sports hall and support for the Sainsbury's development. In terms of specific sites the revised policy has been amended to incorporate the 10 development sites within the Town Centre to emphasise the Councils support of Town Centre regeneration. This includes the School Drive site which encourages a new leisure centre and the proposal for a Sainsbury's supermarket on the Birmingham Road Retail Park which received planning permission on 28th June 2010.

8.280 BDP18 Local Centres

8.281 This policy seeks to protect identified local centres and maintain A class uses where appropriate.

8.282 This is a new policy which has been developed due to feedback received through consultations on the DCS2 and Town Centre AAP. There were concerns from numerous residents as to whether current centres can cope with the increased populations and the affect it will have on infrastructure. There was a growing consensus that people want to shop near to where they live and have more comprehensive centres. Depending on the settlement, some responses felt there was a well balanced mix of shops in their local centres, whereas some responses said there were limited retail amenities. As with BDP12 Sustainable Communities there was considerable support for resisting the loss of existing facilities. The policy was written to reflect these identified concerns.

8.283 BDP19 High Quality Design (CP18)

8.284 *The policy sets out a number of principles to safeguard the local distinctiveness of the District and ensure a high quality, safe and distinctive design throughout developments.*

8.285 There was some support for the policy, in particular the reference to designing out crime, soft landscaping, tree retention and the user hierarchy. There were some misunderstandings that the policy tries to keep all trees rather than those considered appropriate.

8.286 Some questioned the legitimacy of imposing the HCA space standards beyond affordable housing. As one of the aims of planning is to plan for houses that meet people's needs and expectations, it is considered that developers should take into account other published evidence and meet the requirements where viable.

8.287 Some raised concerns that references to the Building for Life and West Midlands Sustainability Checklist in the policy would elevate the status of the two tools which would create an extra burden for developers. Also, funding for the West Midlands Sustainability Checklist has stopped and some suggested developing a local checklist. Comments in relation to the Sustainability Checklist are noted and this has now been removed, however as Building for Life is only an assessment tool guiding developments to achieve good design, it is not considered that policy reference is conflicting with the national policy which also seeks high quality design. There is also no evidence to suggest that high quality design is more costly.

8.288 There were a few objections on the reference to public art, development accessible to all and creating a place that help people get together. These are considered as important elements of place shaping which will help create a unique image of development and promote people's sense of belonging, and are therefore kept in the revised policy.

8.289 Concerns were raised that the document did not sufficiently address the various forms of pollution. This included air pollution, noise pollution and land contamination. Details on these matters have therefore been incorporated into this policy.

8.290 BDP20 Managing the Historic Environment (CP16)

8.291 *This policy advocates a holistic approach to the management of the Districts man- made historic assets and recognises the role of historic assets as a catalyst for regeneration.*

8.292 There was support for the policy however some respondents felt that the policy could be improved. It was argued that the approach to design was too prescriptive and a contemporary approach is not always the right approach. The reference to contemporary design has now been removed with the focus now on achieving development that is sympathetic to historic assets.

8.293 Some respondents considered that the policy should make greater reference to the Historic Environment Assessment, Historic Landscape Characterisation, Conservation Area Appraisals and the West Midlands Farmsteads and Landscape Project. The inclusion of a reference to each of these documents was considered unnecessary as many form part of the evidence base for the policy. A reference to the production of appraisals and management plans for each conservation area has been retained. There was support for the inclusion of a local list and the Council agree with this view. The policy now supports the updating and adoption of a local list. Some felt that there should be a greater emphasis on the re-use of buildings and appropriate climate change measures. Greater reference to these issues are now included within the policy.

8.294 BDP21 Natural Environment (CP17)

8.295 *The policy sets out a range of principles to safeguard the local distinctiveness of the District and ensure the natural environment is managed in a better way.*

8.296 There was some support for the policy and some would like to see greater protection for several habitats such as ancient woodlands and trees and stronger policy wordings such as replacing 'protecting' by 'safeguarding'. Some also referred to functional and ecological connectivity, landscape-scale thinking and suggested the inclusion of a direct reference to the Green Infrastructure policy, the Habitat Inventory and the 'Living Landscape' projects. Most comments are incorporated into this revised policy.

8.297 There was also criticism that the policy repeats national policy and other legislative requirements. It was suggested that illustrative maps should be included. It was considered that the policy builds on national guidance and in many cases is locally distinctive. Also, to ensure that the most up-to-date information is used, it is not considered illustrative maps should be included.

8.298 BDP22 Climate Change (CP19)

8.299 *The policy sets out a number of principles to mitigate the causes of climate change from developments and ensure developments are able to adapt to the impacts of a changing climate.*

8.300 There were some criticisms on demanding market housing to achieve the same level of Code for Sustainable Homes as affordable housing and requiring developments to provide infrastructure to connect to nearby zero/low energy scheme with firm delivery plan. Some also considered the policy repeating the national policy as there was no evidence to demonstrate local circumstances. The Affordable Housing Viability Assessment has been published since DCS2 which identifies that market housing can achieve the relevant level of the Code for Sustainable Homes whilst still providing the required level of affordable housing. As developments have to provide general services, there is no reason why connecting to zero/ low- carbon scheme will affect the viability of the development.

- 8.301 There were some suggestions to reference the impact of transport emissions in affecting carbon emissions, the potential impact of renewable energy schemes on aerodromes and link the policy with Green Infrastructure. It was also raised that the data shown in the Warmer Worcestershire flyover may not be 100% reliable down to the individual building. Where relevant, amendments were made.
- 8.302 BDP23 Water Management (CP20)
- 8.303 *The policy highlights a set of principles to ensure sustainability of the water environment and safeguard developments from the risk of flooding.*
- 8.304 There was some support for the policy and some suggestions for stronger policy wordings and including more details in the justifications and policy such as identifying areas by types of flooding, referring to woodlands as a water risk management tool, easements adjacent to watercourses, referring to the foul drainage hierarchy and cross-referencing to issues that were addressed in other policies. Suggestions are accommodated where appropriate, except cross-referencing and issues that are dealt with in other policies. As flood maps for watercourse flooding, surface water run-off and sewer flooding are included in the evidence document, it is not considered necessary to refer to the areas in the policy justification.
- 8.305 Some considered water efficiency is already addressed in Building Regulations and questioned the viability of achieving the water standard in the Code for Sustainable Homes and BREEAM. The Affordable Housing Viability Assessment was published since the last consultation and identifies that generally the required standard in the Code for Sustainable Homes can be achieved whilst also delivering the required level of affordable housing.
- 8.306 Concerns were raised on the sewage treatment capacity. Given that Severn Trent Water will only initiate funding when development is certain, the policy is revised so that all major developments will need to engage with Severn Trent Water at the earliest opportunity to agree their foul drainage plans.
- 8.307 There were also a few comments that listed the flooding issues in local areas that were not appropriate to include in a strategic policy. These comments were forwarded to the North Worcestershire Water Management Team.
- 8.308 BDP24 Green Infrastructure (CP21)
- 8.309 *The policy identifies a set of principles to safeguard the delivery of a high quality multifunctional green space within and beyond the district boundaries.*
- 8.310 There was some support for the policy although there were doubts in singling out forestry/ woodland from other Green Infrastructure assets in the policy. It was unclear whether the Worcestershire Green Infrastructure Framework will take into account the Delivery Plan of the West Midlands Forestry Framework and given the multiple benefits of trees, it was considered appropriate to include tree planting in the policy. However, it is now confirmed that the

Worcestershire Green Infrastructure Framework will also incorporate the Delivery Plan of the West Midlands Forestry Framework as well as the Woodland Access Standard, so the details about tree planting in the previous version has now been removed.

8.311 The credibility of the evidence base for outdoor sports facilities was questioned and the Council's Leisure Department is now working with Sport England to update the provisions for outdoor sports facilities and Playing Pitch Strategy. Some questioned the amount of open space required as excessive though the standards were supported by evidence.

8.312 It was suggested that supporting maps illustrating the locations of different Green Infrastructure assets should be incorporated. Given that the maps are already included in the evidence base documents and referred to in the policy, it is considered sufficient and no changes were made in this respect.

8.313 BDP25 Health and Well-Being (CP23)

8.314 *The policy seeks to improve the quality of life and well-being of Bromsgrove residents by promoting active, healthy lifestyles as well as improving access to health and leisure facilities.*

8.315 There was support for healthier lifestyles but some respondents felt there needed to be more on improving health and well-being, in particular the over-concentration of A5 uses and the use of allotments. The policy has been updated accordingly to include these topics, with more emphasis applied to the restriction of A5 uses.

8.316 Sport England was concerned at the lack of reference to sport. This matter has now been addressed. Two responses felt the policy should have a more emphasis on green infrastructure, however, the Council believe this topic is addressed adequately in BDP24 and therefore no changes have been made in relation to this issue.

8.317 Policy Omission

8.318 CP5 Neighbourhood Planning Policy

8.319 *The policy seeks to encourage and ensure greater public involvement in the Local Plan making process and in particular through the development of Neighbourhood Plans.*

8.320 Since this policy appeared in the DCS2 there has been a number of policy and legislative changes. These include the commencement of the Localism Act 2011, the Neighbourhood Planning Regulations 2012 and the introduction of National Planning Policy Framework which all confirm the role of Neighbourhood Planning. On this basis it is considered that the policy is no longer necessary.

9. Town Centre Area Action Plan (2011)

- 9.1 The Town Centre Area Action Plan (TCAAP) took into account all previous consultation exercises, national and regional policies and up to date evidence. The document was published alongside the DCS2 for consultation on January 21st 2011 for a period of 12 weeks until April 15th 2011 ensuring that all interested parties had an opportunity to get involved.

9.2 Which Consultation methods were used?

- 9.3 Letters were sent to hundreds of people and organisations inviting comments on the document. An advert was also placed on the Council website, within a number of local newspapers and the Council magazine 'Together Bromsgrove' to ensure that exposure was maximised. Copies of the TCAAP were also placed in public libraries, the Council House and the Customer Service Centre.

- 9.4 All local residents and interested parties were invited to 'drop-in' events which were held at the following times in various locations:

The Council Chamber (Burcot Lane)

Monday February 14 th	10am-5pm
Thursday February 17 th	4pm- 8pm

125 High Street North

(Formerly La Senza opposite Mothercare)

Tuesday February 22 nd	11am-4pm
Wednesday February 23 rd	11am-4pm
Thursday February 24 th	11am-4pm
Friday February 25 th	11am-4pm
Saturday February 26 th	10am-5pm

The Dolphin Centre (Reception Area)

Tuesday March 1 st	11am-4pm
Wednesday March 2 nd	11am-4pm
Thursday March 3 rd	11am-4pm

- 9.5 The 'drop-in' events were well attended by the general public with hundreds of people attending across the 10 days. These people were from different backgrounds and communities across the District. The events were held at different days and times over a 3 week period including weekends and evenings in some instances. This gave everyone an opportunity to attend regardless of whether they worked full-time or were on holiday for some of the events.
- 9.6 Planning Officers attended all the events to give people the opportunity to discuss any issues or concerns they had directly. This was considered to be preferable to more formal presentations where some people may feel less comfortable asking questions. Poster boards were set up highlighting the

developments opportunities in the Town Centre and other key projects such as the naturalisation of the Spadesbourne Brook and public realm improvements to the High Street.

- 9.7 The TCAAP was also presented at a Local Strategic Partnership (LSP) meeting to ensure that all local stakeholders were aware of and understood the purpose of the TCAAP.

9.8 Why has the TCAAP not been progressed to submission?

- 9.9 Following the publication of the NPPF and deletion of PPS's and PPG's there has been a change in emphasis in terms of plan making. Paragraph 153 of the NPPF highlights that each authority should produce a Local Plan for its area and only produce further development plan documents where clearly justified. To make the planning process more accessible to the public the Government has also focussed on streamlining planning guidance and it is therefore logical that this process is followed by Bromsgrove District Council. The TCAAP has therefore been incorporated into the Bromsgrove District Plan. This includes a detailed policy (BDP17) covering a variety of town centre topics and 10 development sites. As indicated below BDP17 has been influenced not only by the previous consultation on the DCS2 but also the 2011 TCAAP consultation.

9.10 What comments were received and how did they Influence the Bromsgrove District Plan?

- 9.11 In total 115 individual responses were received to the TCAAP. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District. Responses were received on many elements of the document including the vision, objectives and each of the policies. Although the majority of comments were general observations about the regeneration of the Town Centre.
- 9.12 There was widespread support for the regeneration of the Town Centre with people having wide ranging views over how the policies and town centre could be improved.
- 9.13 Overall support for the naturalisation of the Spadesbourne Brook was noted with some respondents concerned it would impact the trading access to businesses in the Town Centre. The policy seeks to encourage the naturalisation of specific parts of the Spadesbourne Brook especially in areas that will allow for greater use by local residents whilst not to the detriment of local businesses. The reference to the naturalisation of the Spadesbourne Brook is therefore retained in the latest version of the policy.
- 9.14 A number of references are made to the evening economy with people raising concerns over the expansions of such uses and the associated potential

increase in anti-social behaviour. Some felt that such uses should be contained within just one area of the Town Centre to minimise any impact on surrounding residential areas. Further details on the types of evening economy uses promoted are included within BDP17 although it is considered inflexible to overly specific other potential location of such uses. In addition an Evening Economy Group was established so that local businesses and interested parties could directly influence the economic potential of Bromsgrove Town Centre in the evening.

- 9.15 Some felt that a specific housing target for the Town Centre would be beneficial. In terms of housing numbers it is difficult at this stage to anticipate numbers that could be achieved, partly due to the mixed use opportunities at certain sites and the uncertainties linked to viability and it is considered that any Town Centre housing would provide a windfall gain. The rationale for not incorporating a specific number of residential units in the Town Centre is that it is very difficult to estimate what capacity each site could contain. At this stage specific targets are almost impossible to determine, however, once developers seek to progress with the sites, only then will a realistic target be known and worth referencing. On this basis BDP17 has not been amended to include a housing target.
- 9.16 Some respondents wanted to encourage independent retailers whilst others recognised the potential to attract a large retailer to the Town Centre. The revised policy recognises the importance of small and independent businesses to Bromsgrove and they have a role to play in Bromsgrove in offering alternative shopping choices to the large retailers. In addition the policy seeks a balanced approach in terms of providing the physical space for nationally established retailers whilst also safeguarding the smaller boutique style independent retailers. It is important for Bromsgrove Town Centre to adapt to the modern requirements of retail so that it is a positive environment for retailers.
- 9.17 Several respondents referred to specific development sites with some seeking improvements to the existing sports hall and support for the Sainsbury's development. In terms of specific sites the revised policy incorporates the 10 development sites within the Town Centre to emphasize the Council's support of Town Centre regeneration. This includes School Drive site which encourages a new leisure centre and the proposal for a Sainsbury's supermarket on the Birmingham Road Retail Park which received planning permission on 28 June 2010.
- 9.18 A number of issues were raised in relation to the historic environment. Emphasis was placed on the need to retain the character of the historic town centre, which is a conservation area and also protect any historic buildings whether or not they are statutorily listed. A number of respondents felt that the Drill Hall should be retained although in contrast there was some public support to regenerate the whole site and create a modern building. A number of factors need to be considered when regenerating a site. Local support for keeping certain buildings in Bromsgrove is noted and the Council can seek to encourage the retention of them, but there are other factors that would be

considered when regenerating the identified sites. Whilst the building does have some architectural merit it has previously been turned down for statutory listing by English Heritage. Attempting to redevelop the site whilst retaining the building would impact greatly on viability and greatly reduce capacity on the site. When considering these factors the redevelopment of the site could be very difficult to refuse. There is also no reason why in regenerating the Drill Hall that some reference is given to the historical background to the site. The Drill is therefore included within one of the proposed development sites (TC2) within BDP17.

- 9.19 Transport was an area which raised many comments. Serious concerns were raised over the potential re-routing of traffic along Churchfields which is a residential road. It was felt that this would cause major safety and environmental issues. Following further discussion with the County Council Highway Authority this proposal has not been included within the Bromsgrove District Plan. People highlighted the need for public transport improvements and in particular, better links between the railway station and the town centre. The Council recognise this and wording is included within the policy that supports improvements to public transport.

10. Housing Growth Consultation (2013)

- 10.1 Between 1st April and 15th May 2013, further consultation took place on Redditch Housing Growth alongside consultation on the Draft Borough of Redditch Local Plan No. 4. This was a joint consultation between Redditch Borough Council and Bromsgrove District Council which built on the Development Options Joint Consultation in 2010. Since then the two Councils have undertaken more detailed work to find preferred locations to accommodate Redditch's development needs in Bromsgrove District.
- 10.2 The Housing Growth Development Study was completed in house by Officers from both Councils and identified the most sustainable growth location(s) with more detailed evidence. Two cross boundary sites were identified at Foxlydiate (Site 1) and Brockhill East (Site 2).

10.3 What Consultation Methods were used?

- 10.4 At the start of the consultation period, letters/emails were sent to everyone on both Councils databases to notify them of the consultation opportunity. The letter/email included details of the events that had been organised, how to view the documents and how to submit comments on the documents. A copy of the letter can be found in Appendix G.
- 10.5 A dedicated new email address consultplanning@bromsgroveandredditch.gov.uk and website www.bromsgroveandredditchplanning.co.uk were set up for the purpose of this consultation. The website listed upcoming consultation events, had links to all of the consultation documents, evidence base documents and answered Frequently Asked Questions.
- 10.6 Responses were invited via an online response portal or a printed response form. Responses could be made to either Council and a dedicated administration officer coordinated the collation of both paper and online responses.
- 9.7 The Housing Growth Development Study together with an Executive Summary, Non-technical Summary, Sustainability Appraisal and consultation leaflets, were available for inspection at the following locations:
- Planning Reception, Redditch Town Hall
 - Redditch Library
 - Redditch Mobile library
 - Woodrow library
 - Bromsgrove library
 - Alvechurch library
 - Catshill library
 - Hagley library
 - Rubery library
 - Wythall library

- Redditch One Stop Shops (Batchley, Winyates and Woodrow)
 - Bromsgrove Customer Service Centre
- 9.8 The Housing Growth Consultation Leaflet presented the two Council's preferred option for growth, adjacent to Redditch Borough but within Bromsgrove District, to meet the objectively assessed development needs of Redditch up to 2030.
- 9.9 The leaflet explained why cross boundary development was being considered, what consultation had been undertaken previously and where the preferred locations for development were. The leaflet also included a map of the two preferred development areas, a draft Housing Growth Policy, and details of how to respond to the consultation and where to find additional information.
- 9.10 The leaflet asked three main questions:
- *Do you agree with the chosen areas for new development?*
 - *Do you agree with the Policy produced to deliver these developments?*
 - *If you don't agree with the areas or the policy what alternatives can you suggest?*
- 9.11 A4 Posters were placed on all Redditch Council notice boards during the consultation period. Large A0 Posters advertising the consultation event at the Kingfisher Shopping Centre were put in wall mounted display panels around in the Shopping Centre.
- 9.12 An unmanned display was set up at Planning Reception at the Town Hall alongside the Local Plan No.4 display. Pop-up banners were also located at the Abbey Stadium and Dolphin Leisure Centres when not in use at one of the drop-in sessions.
- 9.13 A series of Drop-in events were held, where people were invited to discuss the cross boundary growth proposals contained within the Consultation leaflet. Officers from both Councils were at the events to talk people through the preferred growth options and the supporting evidence, and to answer questions. These Drop-in events were held in various locations, on a range of days and at different times to ensure people could attend. Details of the exhibitions are listed below:
- Bentley Village Hall Mon 8th April 2-7pm
 - Foxlydiate Arms PH Wed 10th April 10am-8pm
 - Thurs 25th April 10am-8pm
 - Kingfisher Centre Fri 19th April 10am-5pm
 - Sat 20th April 10am-5pm
 - Alvechurch Village Hall Mon 29th April 2-8pm

- 9.14 Officers from Worcestershire County Council Transport Department also attended some exhibitions to provide advice relating to road infrastructure (one of the key concerns).
- 9.15 All events were advertised through the following methods:
- Local Newspapers (advert attached as Appendix H)
 - Website
 - Leaflet
 - Pop-up displays at leisure centres (Abbey Stadium and the Dolphin Centre) (when not in use at Drop-in Events)
 - Screens in council buildings (Redditch Town Hall)
 - Display at Planning reception (Redditch Town Hall)
 - The dissemination of information through Parish Councils
- 9.16 The consultation met the requirements set out within both Councils' Statement of Community Involvement.
- 9.17 Summary of main issues and how these have been addressed**
- 9.18 In total, 456 representations were received on the Cross Boundary Growth issue. Views were expressed by many different groups, developers, businesses and individuals who either live or work in Bromsgrove or Redditch or have an interest in the area.
- 9.19 The Key Issues which arose from the representations were logged jointly and officers from both Councils jointly responded to the Key Issues and gave consideration as to whether further actions were required. On completion, the response tables were agreed and signed off by Policy Managers from both Councils ready to be reported back through the Committee process.
- 9.20 The following paragraphs set out the key issues raised during the consultation period, how they were responded to and what changes were incorporated into the Redditch Cross Boundary Development Policy. Identical versions of this policy appear in both the Redditch Local Plan No.4 and the Bromsgrove District Plan.
- 9.21 Alternative locations for development: several alternative locations for development were suggested in preference to those identified. After further evaluation none of the alternatives were considered to provide a more suitable or sustainable option. Reasons for dismissal were reiterated and explained further where necessary and therefore no changes were made in relation to the choice of sites.
- 9.22 Biodiversity: respondents raised concerns of flora and fauna destruction and the impacts of development on numerous wildlife species, including protected species. This is an issue which would potentially affect any area identified to accommodate cross boundary growth. Before development could commence in any area, a habitats survey and protected species survey would need to be completed in accordance with relevant legislation. This would inform the

master planning of a site in order to maximise opportunities for biodiversity and mitigate the effects of development. Furthermore, ecological assessments would need to be undertaken, including tree and hedgerow analysis and watercourse analysis. It was considered that the issue of biodiversity was sufficiently addressed within the draft policy. The policy highlighted the need for a strategy and management plan for green infrastructure whilst also maximising opportunities for biodiversity and therefore no changes to the policy were made in relation to this issue.

- 9.23 Democratic process: questions were raised as to the conduct of the Councils' democratic process. Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers. All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.
- 9.24 Evidence base: some concerns were raised about the credibility and appropriateness of various elements of the evidence base. These comments have been rebutted as part of the response to the consultation process; however the Pre-submission stage offers the opportunity to raise these issues again under the Soundness checks if grievance is still felt.
- 9.25 Flood risk: concerns of increased risks of flooding were raised for both of the preferred development options and alternative locations for development, but predominantly in relation to flooding within Area 1 (Foxlydiate), in particular, at Feckenham. It is not for any new development to rectify any existing flooding problems as long as it does not exacerbate them. A site specific flood risk assessment would be needed in accordance with the relevant legislation and included mitigation measures where necessary. Any application for development will be dealt with in consultation with the Environment Agency. However, the policy was expanded to make it clear that surface water run-off should not only be managed on and around the sites but also downstream of the sites using SuDS.
- 9.26 Green Belt: concerns of significant impact on the Green Belt. Representations were also concerned with the analysis of Green Belt boundary review, coalescence with neighbouring settlements and urban sprawl. Concerns were raised regarding Green Belt review in both the preferred development options and alternative locations for development, but predominantly in relation to Area 1 (Foxlydiate). Insufficient land supply in the Borough necessitates the need to use Green Belt land to meet development needs and to reassess existing boundaries. Any development around Redditch's urban area would

result in Green Belt erosion. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. On the basis no boundary changes were made to the identified sites.

- 9.27 Historic Environment: responses have highlighted various historic assets within several areas during the consultation period. All relevant historic assets have been identified from the Historic Environment Record and taken into consideration in the HGDS. Any development proposals would need to make reference to survey work on the historic environment and undertake archaeological assessment to the standards required by WCC.
- 9.28 Infrastructure – General: concerns ranged from areas not needing additional facilities to an under provision of GP surgeries, dentists, shops, pubs, sports and recreation facilities. Development on the scale proposed is likely to require new facilities such as those identified above. The draft version of the cross boundary policy already made reference to the provision of community infrastructure however this has now been expanded in the updated version of the policy. This states *‘in preparing development proposals, provision should be made for any necessary infrastructure for the effective delivery of the site’*.
- 9.29 Infrastructure – Education: concerns that local schools are at full capacity. WCC as education authority has indicated that two new first schools are required to support the needs of the development up to 2030. The provision of new schools was already addressed within the policy and therefore no changes were made in this regard.
- 9.30 Infrastructure – Funding: questions were raised as to how infrastructure would be funded. Generally developers will fund the infrastructure and the Infrastructure Delivery Plan will identify the funding streams.
- 9.31 Infrastructure – Health: concerns were raised that existing GP and hospital facilities would not be able to cope with an increase in population; especially given the current plans to down-grade the Alexandra Hospital. Worcestershire Acute Hospitals NHS Trust was consulted on this proposal and is aware of the amount of development needed and population changes up to 2030. The Councils will continue to engage with the Trust and the Redditch and Bromsgrove Clinical Commissioning Group through the Infrastructure Delivery Plan process. As it is currently unclear where additional health provision is required no changes to the policy could be made.
- 9.32 Infrastructure – Utilities: concerns regarding the provision of utilities due to cost and remoteness of potential development locations. There has been no indication from infrastructure providers that there will be a problem servicing any site around Redditch. Furthermore utility providers have not made representations on specific sites. Consultation with the infrastructure providers is ongoing to determine the infrastructure needed to support development. To reflect comments raised the policy was expanded to state *‘in*

preparing development proposals, provision should be made for any necessary infrastructure for the effective delivery of the site’.

- 9.33 Landscape: issues of landscape sensitivity and the impacts that development would have were raised. The medium/ high Landscape Character Assessment is similar across several areas subject to the Focussed Area Appraisal; therefore sensitive design would be required to mitigate the impact on the landscape. Whilst it is preferable for development to occur in areas of low sensitivity, all of the land around the periphery of Redditch is of medium or high sensitivity and therefore medium sensitivity areas are not an undue constraint that weighs for or against the choice of a particular area. To ensure that the landscape issues were addressed in more detail the following text was added to the policy: *“Both sites should be sensitively designed to integrate with the surrounding existing environment and landscape”.*
- 9.34 Level of development needed: questions were raised as to the level of housing provision identified and whether it was needed or constituted the right type of housing tenure. The SHMA and SHLAA were used to support the LA position. These are both considered to be robust and reliable and therefore no changes were made to the quantum of development proposed within the policy.
- 9.35 Planning/ consultation process: questions were raised as to the appropriateness of the methods undertaken to consult the public, whether the consultation period was sufficient, non-compliance under Duty to Cooperate etc. These comments have been addressed as part of the response to the consultation process; however the Pre-submission stage offers the opportunity to raise these issues again under the Soundness checks if grievance is still felt.
- 9.36 Sewage Treatment: issues relating to cost and sustainability of treating waste water were raised with respect to different locations which could accommodate development. Sewerage treatment is only one aspect of sustainability. Although it is of course likely that STW’s preference for sites to be located where the costs to STW are lower, there are other considerations that lead to the selection of preferred sites. The policy has been expanded to emphasise that there will need to be sufficient capacity of the sewerage systems for both wastewater collection and treatment whilst also encouraging engagement with both Severn Trent and the Environment Agency.
- 9.37 Sustainability: issues were raised that some locations were more remote to existing local facilities, employment opportunities, retail and health facilities. The policy is attempting to create sustainable development with onsite provision of community and other facilities and good connectivity to the town centre, schools etc. Other issues relating to increased car journeys are not particular to one site only. It is acknowledged any growth in the population will increase car usage. The draft policy already required improvements to passenger transport to encourage modal shift and has now been expanded to highlight that all dwellings should be within 250m of a bus stop.

- 9.38 Sustainability Appraisal: some concerns were raised about the credibility of the SA. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate. An SA has also been undertaken on the policy highlighting the overall positive impact against the SA objectives emphasising that the sites can be delivered in a sustainable manner.
- 9.39 Transportation – Public transport: concerns relating to inadequate public transport network. The policy already made provision for significant improvements to the passenger transport network but this has now been expanded further to emphasise that all dwellings should be within 250m of a bus stop.
- 9.40 Transportation – Road Infrastructure: concerns raised that existing network of country lanes would be inadequate to take an increase in traffic. This issue is not limited to one location as all sites are on the rural/urban fringe of Redditch. The development will require a new road network to accommodate the volumes of traffic envisaged. It is anticipated that the most convenient access points will take traffic directly onto the Strategic Highway Network. Other issues raised relate to existing congestion and traffic speeds etc. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required. The need for a Transport Assessment was already highlighted in the draft policy and therefore no changes have been made in this regard.

11. Conclusion

- 10.1 This document accompanies the Proposed Submission version of the Bromsgrove District Plan. The Consultation Statement has been produced under Regulation 17(d) of the Town and Country Planning (Local Planning) (England) Regulations 2012. In accordance with the regulations the document has set out who was invited to make representations, how they were invited to make representations, the main issues raised and how they were addressed in the Bromsgrove District Plan.
- 10.2 The Council invited specific consultation bodies, general consultation bodies, developers, planning consultants and residents and business in the district to make representations. Every effort was made to engage with the full spectrum of residents within the district including the young, elderly, families and those from minority groups.
- 10.3 A wide variety of consultation methods were used through each stage of the process. These included letters, advertisements in newspapers and magazines, 'drop-in' events, presentations and focussed meetings. Each of the consultation periods had carefully designed response forms or questionnaires to make it as easy as possible for people to respond.
- 10.4 Across all of the consultations a wide range of issues were raised. The issue that was addressed most often was housing. Comments ranged from what the target should be, the need for affordable housing, where housing should be located and a range of detailed comments on each of the proposed allocations. Comments were also received on a wide variety of other issues including the environment, the economy and the role of the Town and other settlements in the district.
- 10.5 Each of the Draft Core Strategies, Town Centre AAP and the Bromsgrove District Plan were shaped and amended to reflect the comments of respondents to consultations. Changes ranged from minor typos, the re-wording of sentences to the introduction of whole new issues and policies. For example, following feedback to the Draft Core Strategy the Draft Core Strategy 2 included new policies on a settlement hierarchy, housing for the elderly, Green Belt and Green Infrastructure. It is clear that the Bromsgrove District Plan has evolved at every stage through feedback from key stakeholders, interested parties and residents of the district.

Appendix A: Specific Consultation Bodies

Alvechurch Parish Council
Barnt Green Parish Council
Belbroughton Parish Council
Bentley Pauncefoot Parish Council
Beoley Parish Council
Bournheath Parish Council
Catshill Parish Council
Clent Parish Council
Cofton Hackett Parish Council
Dodford with Grafton Parish Council
Frankley Parish Council
Finstall Parish Council
Lickey and Blackwell Parish Council
Lickey End Parish Council
Hunington Parish Council
Hagley Parish Council
Mappleborough Green Parish Council
Romsley Parish Council
Stoke Prior Parish Council
Tutnall and Cobley Parish Council
Wythall Parish Council
British Gas
British telecommunications plc
The coal authority
The Department for Health
The Department for Transport
English Heritage
The Environment Agency
Staffordshire County Council
Warwickshire County Council
Worcestershire County Council
Birmingham City Council
Solihull Metropolitan Borough Council
Stratford-on-Avon District Council
Redditch Borough Council
Wychavon District Council
Wyre Forest District Council
South Staffordshire Council
Dudley Metropolitan Borough Council
West Mercia Police
The Highways Agency
The Mobile Operators Association
National Grid Transco
Natural England
Network Rail
Severn Trent Water Ltd
South Staffs Water
West Midlands Regional Assembly (now abolished)
Advantage West Midlands (now abolished)
Greater Birmingham and Solihull Local Enterprise Partnership
Worcestershire Local Enterprise Partnership
NHS Health and Care Trust

Western Power Distributions (replaced Central Networks)
Homes and Communities Agency
DEFRA
Birmingham International Airport
The Commission for Architecture and the Built Environment
Office of Rail Regulation
Worcestershire Local Nature Partnership

Appendix B: Together Bromsgrove Article, Summer 2008

Together
Bromsgrove

SENSE OF COMMUNITY & WELL-BEING

Summertime fun!

Street Theatre

bigger and better than ever

More people than ever before will be able to enjoy our popular Street Theatre as we widen its horizons and take it out into the District throughout August. It will still be held, as usual, on the Bromsgrove town's Recreation Ground on Wednesday 6, 13 and 20 and will also be travelling to Wythall Park on Thursday 7, Hagley Park on Thursday, 14, and St Chads Park, Rubery on Thursday, 21. It's free family fun for everyone with a full programme of top class national and international headline acts,

sideshow and much, much more, including face painting, hair braiding, drumming and circus skills. This year will see the return of the giant automatic robot, the dare-devil Black Eagles, and spell bounding trapeze artists, as well as some new acts. Last year over 11,000 visitors, young and old and all ages in-between from near and far, enjoyed the entertainment extravaganza and this year, by taking it out and about, we hope even more people will make it a diary date.



Appendix C: Advertisement in Together Bromsgrove Magazine (Winter 2008 Issue)

IMPROVEMENT

How do you think Bromsgrove should look in 20 years?



Local Development Framework

Make sure you have your say

If you are passionate about where you live, there are hundreds of reasons to get involved in planning for the District's future. We want you to participate in the growth of your District and have an active contribution to the provision of homes, jobs and leisure facilities. We have recently produced a draft Core Strategy to guide the way the District develops and would like your feedback on what you think.

With your support, we intend to make sure the right number and types of homes are built, whether it is affordable first time homes for young couples and families, the right sort of homes for elderly residents, or other forms of housing that meets the needs of the people of Bromsgrove. You can also assist us in creating the right kind of shopping centre as well as leisure and community facilities for the local people, so there is no need to travel to Birmingham or elsewhere to find what you need. And for businesses, it means creating the best possible office and industrial spaces, so they can grow and local people can find more, better paid jobs.

What are the local issues?

The main issues identified are listed below, and we would like you to have your say on them:

- Meeting government targets for new housing and employment land.

- Responding to climate change.
- Lack of affordable homes.
- People living in the District yet commuting in order to work and shop.
- An increase in young residents leaving in search of work and housing.
- Local public transport needs improvement.
- The revival of the Town Centre as well as regeneration at Longbridge.
- Protecting and promoting the historic and natural environment.
- Keeping the sense of community 'alive'.

How to get involved?

It is simple to get engaged in the District's planning aspirations. We want your views to deliver the best possible solutions for making Bromsgrove District a better place to live, work and visit. All relevant information regarding the consultation will be available on the Council website, in local libraries and will be advertised in the local press. We intend to hold an exhibition event at the Council House in November and everyone is invited. This will give you the opportunity to talk to planning officers face to face. The views and opinions of local people are vital to this process, so please get involved!

Contact details

E:mail: ldf@bromsgrove.gov.uk
Telephone Strategic Planning
01527 881323/1314/1328
website: www.bromsgrove.gov.uk/planningpolicy

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Appendix D: Photograph from 'drop-in' today at the Council House on 08/01/2009



Appendix E: Advertisement in Bromsgrove Standard, 12th Friday 2010

conservatories at a discounted price

Fax: 01527 576 551

Unit 6,
Sanders Road Ind Est,
Bromsgrove,
B61 7DG

meet the demand.

For the more arty person, there is also the 'Exploring Drawing' and 'Watercolour Workshops'. Both are taken by professional local artists, use the museum's beautiful buildings for inspiration and are suitable for people of all abilities - from novice to expert. Once again, participants can have a piece of work to take home with them.

courses are available as part of the 'experience days' at Avoncroft. (s)

Costs for the experience days start from £55 for museum members and £65 for non-museum members.

For more on the days and available dates, visit: www.avoncroft.org.uk, e-mail the booking officer: bookings@avoncroft.org.uk or call 01527 831363.

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★ www.littlestartuition.com ★

★ 01527 875449 ★

Bromsgrove and Redditch Core Strategies

Help us to plan the future of the area

Redditch Borough Council and Bromsgrove District Council have teamed up to invite people to have their say on where new development should be located in and around the borough over the next 16 years.

Following a Government review of housing need, Redditch borough has been given a target of providing around 7,000 new properties and 68 hectares of land for new employment by 2026. This is broken down as follows:

- Around 4000 houses within Redditch's own boundaries
- Around 3000 houses within Bromsgrove (in the green belt adjacent to Redditch's boundary)
- 31 hectares of employment land in Redditch
- 25 hectares of employment land in Bromsgrove
- 12 hectares of land for employment in Stratford on Avon

The targets have been set by the West Midlands Regional Spatial Strategy and both Bromsgrove District Council and Redditch Borough Council now have to decide where the new properties and the employment land can be located on the borders of these two areas.

To find out more, the following events are being held to give people the chance to speak to a planning officer from either Council at:

- Redditch Town Hall, 2pm to 9pm, 11th February
- The Kingfisher Centre, Redditch all day, 13th February
- The Palace Theatre, Redditch from 6.30pm, 24th February.

You can also read more about the consultation on the Council's websites:

- www.redditchbc.gov.uk/corestrategy
- www.bromsgrove.gov.uk/corestrategy

Make sure you have your say

We would like to hear your views on the options put forward but if you have an alternative option please let us know.

You can send your views to either Council either by writing to us or by email preferably by using the response form available on the websites or by telephoning us.

Contact details:

Telephone:
Redditch on (01527) 64252 ext 3081
Bromsgrove on (01527) 881316.

Email:
devplans@redditchbc.gov.uk
ldf@bromsgrove.gov.uk

By writing:
Bromsgrove District Council
 Planning and Environment Services
 The Council House, Bromsgrove,
 Worcestershire B60 1AA
Redditch Borough Council
 Development Plans
 Town Hall, Walter Stranz Square, Redditch,
 Worcestershire B98 8AH

The views of local people are vital to this process so please get involved!

Consultation closes on 22nd March 2010.





Bromsgrove District Council
www.bromsgrove.gov.uk

BUILDING PRIDE



REDDITCH BOROUGH COUNCIL
 making a difference
www.redditchbc.gov.uk

Appendix F: Advertisement published in the Bromsgrove Standard and the Redditch Standard, February 2011

Bromsgrove District Council Planning and Regeneration

Imagine Bromsgrove in the future...

Have we got it right?

If you are passionate about where you live, there are hundreds of reasons to get involved in planning for the District's future. Bromsgrove District Council has produced the following documents and we would like to hear your views on them:

- **Draft Core Strategy 2**
- **Bromsgrove Town Centre Draft Area Action Plan**

The consultation will run from 21st January until 15th April 2011.

Interested? want to find out more?

Throughout February and March we will be holding exhibitions, "drop-in" events and information will be continually updated on our dedicated websites:
www.bromsgrove.gov.uk/corestrategy
www.bromsgrove.gov.uk/towncentre

All the plans will be on display and officers will be on hand to answer any queries at the following venues:

The Council Chamber (Burcot Lane)

Monday February 14th	10am-5pm
Thursday February 17th	4pm- 8pm

125 High Street North
 (Formerly La Senza opposite Mothercare)

Tuesday February 22nd	11am-4pm
Wednesday February 23rd	11am-4pm
Thursday February 24th	11am-4pm
Friday February 25th	11am-4pm
Saturday February 26th	10am-5pm



The Dolphin Centre (Reception Area)

Tuesday March 1st	11am-4pm
Wednesday March 2nd	11am-4pm
Thursday March 3rd	11am-4pm

Full information is available on the Council website, at the Customer Service Centre, in local libraries and at the Council House reception or you can contact the Strategic Planning Team on the numbers given below.

Email: LDF@bromsgrove.gov.uk
 Telephone: **01527 88 1328/1314/1323**

The views and opinions of local people are vital to this process, so please tell us what you think!



Bromsgrove District Council
www.bromsgrove.gov.uk



Local Development Framework

Appendix G: Consultation Letter, March 2013



Bromsgrove
District Council
www.bromsgrove.gov.uk



Date as postmark

Dear Consultee,

Bromsgrove District and Redditch Borough Councils Consultation on Housing Growth

Bromsgrove District and Redditch Borough Councils are preparing their Development Plan Documents. These will form the main planning documents for the Councils up to 2030. This Consultation is about where to build 3400 houses on the edge of Redditch Town in the Bromsgrove District. Areas have been chosen in the Foxlydiate / Webheath area and the Brockhill area.

Recent changes to the planning system has reinforced the requirement for plans to meet the full objectively assessed housing needs and requires Councils to work together under the Duty to Cooperate to meet these needs. The evidence shows that Redditch's housing requirements up to the year 2030 should be 6400 new dwellings. However Redditch only has the capacity to accommodate 3000 houses in sustainable locations within the Borough. Therefore the Councils have agreed to jointly find and consult upon suitable locations within Bromsgrove to sustainably accommodate this shortfall of 3400.

In 2010 the Councils jointly consulted on broad cross boundary growth options. This work has now been updated with more detailed studies to find suitable locations to accommodate this development. A document entitled 'Housing Growth Development Study' has been produced and this provides detailed information on how the Councils have been working jointly to identify a preferred location to accommodate the growth. This study is also supported by other documents including a Sustainability Appraisal.

The Councils are now holding a joint consultation on how Redditch's development needs can be accommodated both within Redditch and Bromsgrove, adjacent to Redditch. We welcome your views on the areas chosen and the draft policy, together with any views you may have on the supporting information, including the Sustainability Appraisal.

You can see all the information and reply online by visiting www.bromsgroveandredditchplanning.co.uk or you can submit responses on a response form which is available to download via the website or at one of the

consultation events or you can respond by email, or post by writing to either Council at:

Bromsgrove District Council

Planning and Regeneration
The Council House
Burcot Lane
Bromsgrove, Worcestershire
B60 1AA

Tel: 01527 881316

e-mail: consultplanning

@bromsgroveandredditch.gov.uk

Redditch Borough Council

Development Plans
Town Hall
Walter Stranz Square
Redditch, Worcestershire
B98 8AH

Tel: 01527 64252 ext.3081

e-mail: consultplanning

@bromsgroveandredditch.gov.uk

You can also talk to planning officers at the following events:

When		Where
8 th April	2pm - 7pm	Bentley Village Hall
10 th April	10 am - 8pm	Foxlydiate Arms
19 th April	10am - 5pm	Kingfisher Centre Shop (close to Thorntons and Argos)
20 th April	10am - 5 pm	Kingfisher Centre Shop(close to Thorntons and Argos)
25 th April	10am - 8pm	Foxlydiate Arms
29 th April	2pm - 8pm	Alvechurch Village Hall

The deadline for submitting comments is **Wednesday 15th May 2013**

Further information is available on the Councils joint website

www.bromsgroveandredditchplanning.co.uk

We look forward to receiving your response and / or seeing you at one of the consultation events.

Yours faithfully,



Mike Dunphy
Strategic Planning Manager
Bromsgrove District Council



Emma Baker
Acting Development Plans Manager
Redditch Borough Council

Appendix H: Advert placed in Bromsgrove and Redditch Standard newspapers, April 2013

Bromsgrove District Council and Redditch Borough Council Housing Growth

Redditch needs to provide 6400 dwellings by the year 2030. Redditch Borough only has the capacity to accommodate 3,000 within its own boundaries. Therefore Bromsgrove District Council and Redditch Borough Council have been working together to identify a suitable location for meet this shortfall. This consultation shows two potential locations in Bromsgrove District that could accommodate the outstanding 3,400. The Housing Growth Development Study, which supports this consultation, identifies the most sustainable growth locations based on detailed evidence. The outcome of the report is that 'Foxdyate' and 'Brockhill East' are, on balance, considered to be the most suitable areas for the Council's growth options (shown as sites 1 and 2 on the map).

Where do I find our more information?

More information about this consultation is available on the Councils joint website: www.bromsgroveandredditchplanning.co.uk
Various drop-in sessions have been organised at the locations and times shown below. You are encouraged to come along to them where you can look at the exhibition and speak to planning officers from both councils:

Event	Date
Bentley Village Hall	Mon 8th April 2pm - 7pm
Foxydyate Arms Drop-in Sessions	Wed 10th April 10am - 8pm Thur 25th April 10am - 8pm
Kingfisher Shopping Centre, Redditch (close to Thorntons and Argos)	Fri 19th April 10am - 5pm Sat 20th April 10am - 5pm
Alvechurch Village Hall	Mon 29th April 2pm - 8pm

Make sure you have your say

We would like to hear your views on the locations chosen and the policy produced regarding future development around Redditch. If you don't agree with the areas or the policy what alternatives can you suggest?

You can send your views online or a copy of the response form is available on the Councils joint website:

www.bromsgroveandredditchplanning.co.uk

Responses can also be submitted by email, fax or by post at the addresses below:

Contact details:

The Strategic Planning Team
Planning and Regeneration
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire B60 1AA
Tel: 01527 88 1323/1316
Fax: 01527 88 1313

Or email:

consultplanning@bromsgroveandredditch.gov.uk

Consultation starts on

Monday 1st April

and closes on

Wednesday 15th May 2013



Bromsgrove
District Council
www.bromsgrove.gov.uk



*The views of local people are vital to this process
so please get involved!*

We will consider reasonable requests to provide this document in accessible formats such as **large print, Braille, Moon, audio CD or tape or on computer CD**

"Need help with English?" Contact Worcestershire HUB, Bromsgrove 01527 881288

'Potrzebujesz pomocy z angielskim?' Skontaktuj się z Worcestershire HUB, Bromsgrove, tel.: 01527 881288

"İngilizce için yardıma ihtiyacınız var mı?" 01527 881288 numarayı arayıp Worcestershire HUB, Bromsgrove ile irtibata geçin

"ইংরাজির জন্য সাহায্য চাই ?" 01527 881288 নম্বরে উস্টাশায়ার হাব [HUB] ব্রমসগ্রোভ [Bromsgrove]-এ টেলিফোন করুন

"ਅੰਗਰੇਜ਼ੀ ਵਿਚ ਮਦਦ ਚਾਹੁੰਦੇ ਹੋ?" ਵੁਰਸੈਸਟਰਸ਼ਾਇਰ ਹੱਬ [HUB] ਨੂੰ ਬਰੋਮਸਗਰੋ [Bromsgrove] ਵਿਖੇ 01527 881288 'ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ

"انگریزی میں مدد چاہتے ہیں؟" ورسیسٹر شائر ہب [HUB]، برومزگرو [Bromsgrove] میں 01527 881288 پر رابطہ کریں



Bromsgrove
District Council

www.bromsgrove.gov.uk

○ Planning and Regeneration
Strategic Planning

Bromsgrove District Council, The Council House
Burcot Lane, Bromsgrove, Worcestershire B60 1AA
Main Switchboard: (01527) 881288

Fax: (01527) 881313

DX: 17279 Bromsgrove

Email: strategicplanning@bromsgroveandredditch.gov.uk