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Bromsgrove District Plan Review Issues and Options

Sustainability Appraisal Report



Report for

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Document revisions

No.	Details	Date
1	Draft Report	June 2018
2	Final Report	August 2018

Disclaimer

Wood has undertaken this SA in an objective, independent and impartial fashion according to the Code of Conduct set by the RTPI and Wood's internal Code of Conduct. The approach, appraisal and reporting have been undertaken to comply with the requirements of Section 19(5) of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment (SEA) regulations (2004 No. 1633). There is no conflict of interest with other work undertaken, or contributed to, by Wood (this includes the Greater Birmingham Housing Market Area Strategic Growth Study (SGS)). The appraisal undertaken for the Council is based on different objectives and decision making criteria to that of the SGS. Whilst the topics covered by the SEA regulations (for example, biodiversity, population, human health, fauna, flora, soil, water, air and climatic factors) that need to be addressed through SA are the same, specific local objectives and bespoke decision making criteria are used to appraise policies and proposals. This consideration of more local information can lead to different SA outcomes as it is based on different information. This applies to the District Plan Review.

SA is carried out against a framework of objectives and decision making criteria which is specific to the Plan/Study being assessed. The 2012 Scoping Report, which underpinned the appraisal of the Bromsgrove District Plan (adopted in January 2017), included 18 SA objectives. To ensure consistency with the SA Report which accompanied the now adopted District Plan and the approach to appraisal of the Plan's effects, these SA objectives have provided the basis for development of the SA Framework for the Plan Review process. The 18 objectives have been refined in light of the up-to-date review of plans, programmes and baseline evidence set out in Section 2 and Section 3 of the draft Scoping Report (March 2018), and consideration of recent best practice. Consequently, the revised SA Framework includes 15 objectives with associated guide questions rather than the 18 set out in the 2012 Scoping Report. There are also 78 decision making criteria questions which guide the assessor's thought process during SA. For comparison, the Strategic Growth Study SA Report had 9 SA objectives and 14 decision making criteria meaning that they two cannot be directly compared.

Non-Technical Summary

Introduction

This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) Report produced as part of the SA of the new District Plan for Bromsgrove (the District Plan) that is currently being prepared by Bromsgrove District Council (the Council). The SA is being carried out on behalf of the Council by Wood Environment & Infrastructure Solutions UK Limited 2018) (Wood) to help integrate sustainable development into the emerging District Plan.

The Council is currently consulting on the District Plan Issues and Options document and related information, including this SA Report. This is the first opportunity to get involved in the District Plan Review, and the Council are asking for comments on whether the Issues and Options identified across Bromsgrove District are appropriate and whether there is anything that may have been overlooked that should be considered.

The following sections of this NTS:

- ▶ Provide an overview of the Draft District Plan;
- ▶ Describe the approach to undertaking the SA of the Draft District Plan;
- ▶ Summarise the findings of the SA of the Draft District Plan; and
- ▶ Set out the next steps in the SA of the Draft District Plan including how to respond to the consultation on this SA Report.

What is the Bromsgrove District Plan?

The current Bromsgrove District Plan (2011-2030), was adopted in January 2017 and was caveated with a need to undertake a Plan Review by 2023 (Policy BDP3) as the Council were unable to allocate enough housing land in locations not covered by Green Belt designation. The Plan Review is needed to ensure that the full housing requirement for Bromsgrove District up to 2030 can be delivered and that safeguarded land for the 2030-2040 period can be identified. Furthermore, the Council has a duty to consider whether there are any realistic options to assist the West Midlands conurbation in meeting its current housing shortfall. The District Plan Review must be prepared in accordance with the Duty to Cooperate, which sets a legal duty for the Council and other public bodies to engage constructively, actively and on an ongoing basis on planning issues which affect more than one local planning authority area. Following the publication of the Revised National Planning Policy Framework (NPPF) this will now need to be evidenced through a Statement of Common Ground (NPPF paragraph 35). As Green Belt boundaries should only be altered as part of plan preparation or review, and only in exceptional circumstances, the Council is taking this opportunity to review the District Plan in its entirety and to extend its longevity.

The new District Plan will incorporate strategic policies, development management policies and other site allocations and the District Plan will also:

- Provide the planning principles, including detailed development management policies to guide future development and planning decisions beyond 2030;
- Set the general scale and distribution of new development which is required to meet Bromsgrove's needs up to and beyond 2030;
- Include strategic allocations as well as detailed land allocations and designations;
- Include site specific proposals for the development, protection and conservation of land;

- Contribute to achieving sustainable development;
- Include a monitoring and implementation framework;
- Have regard to any other issues to meet Government, or other emerging policy areas;
- Be produced through on-going co-operation with neighbouring authorities and other bodies to reflect issues and sites that are wider than District level; and
- Be produced through a consultative process so that the Plan reflects the collective Vision of communities in the District.

In preparing the new District Plan, the Council has completed an Issues and Options Consultation Document which it is now seeking views on. The Issues and Options Document includes the following vision for the District:

"By the end of the Plan period Bromsgrove District and its communities will have become more sustainable, prosperous, safe, healthy and vibrant. People from all sections of society will have been provided with better access to homes, jobs and services. The attractiveness of the District in terms of its natural environment, built form and settlements will continue to be preserved and enhanced."

A set of Strategic Objectives has been defined that aims to deliver the Plan's Vision. The proposed Strategic Objectives, which are not in any specific order of preference, are presented below:

- SO1 Encourage the continued regeneration of Bromsgrove Town Centre to create a thriving, accessible and vibrant centre providing facilities to meet the needs of Bromsgrove District's residents
- SO2 Focus new development in sustainable locations in the District
- SO3 Support the vitality and viability of local centres and villages across the District
- SO4 Provide a range of housing types and tenures to meet the needs of the local population, including the special needs of the elderly and the provision of affordable housing
- SO5 Provide support, encouragement and connectivity for economic growth of existing and new businesses, whilst also supporting farming and rural diversification and investing in lifelong education and learning skills
- SO6 Encourage more sustainable modes of travel and a modal shift in transport, for example, encouraging walking and cycling and promoting a more integrated, sustainable and reliable public transport network across the District
- SO7 Improve quality of life, sense of well-being, reduce fear of crime, promote community safety and enable active, healthy lifestyles, for example, by providing safe and accessible services and facilities to meet the needs of Bromsgrove District's residents
- SO8 Protect and enhance the unique character, quality and appearance of the historic and natural environment, biodiversity and Green Infrastructure throughout the District
- SO9 Safeguard and enhance the District's natural resources such as soil, water and air quality; minimise waste and increase recycling including re-use of land, buildings and building materials
- SO10 Ensure the District is equipped to mitigate and adapt to the impacts of climate change, for example, by managing and reducing flood risk, by ensuring water and energy efficiency and by encouraging new developments to be low or zero carbon

- SO11 Promote high quality design of new developments and use of sustainable building materials and techniques
- SO12 Foster local community pride, cohesion and involvement in the plan making process

The Issues and Options Document also presents the issues and options for the topics for which the plan will subsequently contain planning policies:

- Strategic Issues for Bromsgrove District;
- Housing;
- Employment;
- Transport;
- Town Centre and Local Centres;
- Social infrastructure;
- Natural environment;
- Historic Environment; and
- Climate change and water resources.

What is Sustainability Appraisal?

National planning policy¹ states that district plans are key to delivering sustainable development. Sustainable development is that which seeks to strike a balance between economic, environmental and social factors to meet the needs of the present without compromising the ability of future generations to meet their own needs.

It is very important that the District Plan contributes to a sustainable future for the plan area. To support this objective, the Council is required to carry out a SA of the District Plan². SA is a means of ensuring that the likely social, economic and environmental effects of the District Plan are identified, described and appraised and also incorporates a process set out under a European Directive³ and related UK regulations⁴ called Strategic Environmental Assessment (SEA). Where negative effects are identified, measures are proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures are considered that could enhance such effects. SA is therefore an integral part of the preparation of the District Plan.

¹ See paragraph 7 of the National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2018).

² The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

³ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

What Has Happened So Far?

The first stage (**Stage A**) of the SA process involved consultation on a SA Scoping Report. The Scoping Report⁵ set out the proposed approach to the appraisal of the District Plan including a SA Framework and was subject to consultation that ran from 15th March to 19th of April 2018. A total of 4 responses were received to the consultation from the statutory SEA consultation bodies (Natural England, the Environment Agency and Historic England) and one Parish council. Responses related to all aspects of the Scoping Report and resulted in amendments to the SA Framework. A schedule of the consultation responses received to the Scoping Report, the response and the subsequent action taken are provided at **Appendix B** of this SA Report.

This NTS and the main SA report have been prepared as part of **Stage B** of the process. This stage is iterative and involves the development and refinement of the District Plan by testing the sustainability strengths and weaknesses of the emerging Plan options, spatial strategy, policies and allocations. In this respect, SA will be undertaken throughout the preparation of the District Plan with the findings presented in a series of interim SA Reports, including this report.

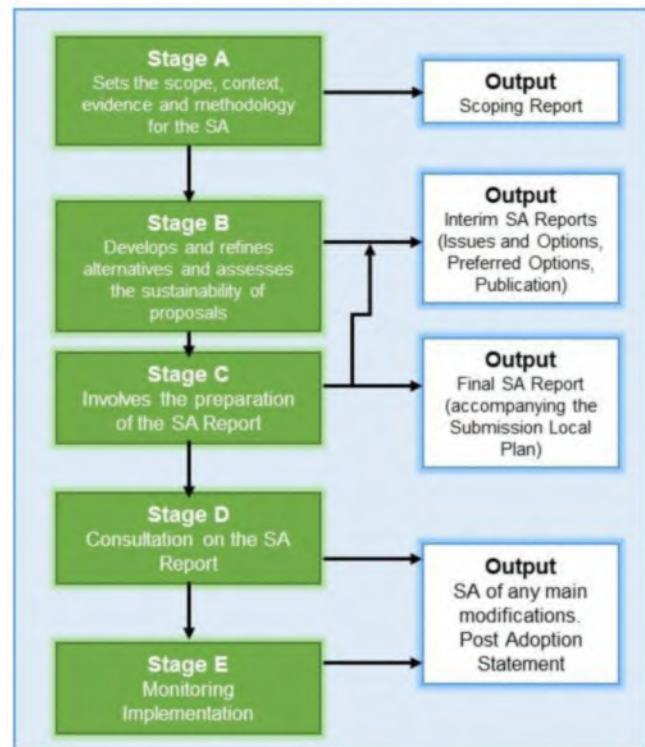
At **Stage C**, a final SA Report will be prepared to accompany the submission draft District Plan. This will be available for consultation alongside the draft District Plan itself prior to consideration by an independent planning inspector (**Stage D**).

Following Examination in Public, and subject to any significant changes to the draft District Plan that may require appraisal, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the District Plan. This will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted District Plan. During the period of the District Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

How Has the Issues and Options Document been Appraised?

To support the appraisal of the District Plan, a SA Framework has been developed. This contains a series of sustainability objectives and guide questions that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the District Plan and the objectives contained within other plans and programmes reviewed for their relevance to the SA and the District Plan. These SA Objectives also reflected the 18 SA Objectives developed and used in the SA of the Bromsgrove District Plan (adopted in January 2017). The objectives have been refined in light of the up-to-date review of plans, programmes and baseline evidence set out in Section 2 and Section 3 of the main SA Report, and consideration of recent SA best practice. Consequently, the revised SA Framework includes 15 objectives with associated guide

Figure NTS.1 The SA Process



⁵ Amec Foster Wheeler (2018) *Bromsgrove District Plan Sustainability Appraisal: Scoping Report*.

questions rather than the 18 used for the SA of the adopted plan. **Table NTS.1** presents the SA Framework for the District Plan.

Table NTS.1 SA Objectives and Guide Questions Used to Appraise the District Plan

SA Objective	Guide Questions
1. To protect and enhance the quality of water, soil and air.	<ul style="list-style-type: none"> Will it provide opportunities to improve and maintain water quality? Will it encourage sustainable and efficient management of water resources? Will it ensure that essential water infrastructure is appropriately planned and co-ordinated with all new development? Will it provide opportunities to improve and maintain soil quality? Will it improve and maintain air quality? Will it address air quality issues in the Air Quality Management Areas (AQMA) and prevent new designations of AQMA? Will it help to improve failing waterbodies through appropriate mechanisms such as SuDS and improvements to watercourses (including new watercourses, or opening up of culverted systems)?
2. To ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	<ul style="list-style-type: none"> Will it safeguard the District's mineral resources? Will it help to protect the District's best and most versatile agricultural land from adverse developments? Will it maximise the use of Previously Developed Land? Will it reduce the amount of contaminated, derelict, degraded and under-used land? Will it encourage the reuse of existing buildings and infrastructure? Will it protect the District's open spaces of recreational and amenity value?
3. To manage waste in accordance with the waste hierarchy: 1) Prevention 2) Preparing for reuse 3) Recycling 4) Other recovery 5) Disposal	<ul style="list-style-type: none"> Will it minimise the demand for raw materials? Will there be opportunities to increase recycling? Will it reduce the production of waste and manage waste in accordance with the waste hierarchy? Will it ensure the design and layout of new development supports sustainable waste management?
4. To ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas.	<ul style="list-style-type: none"> Will it protect the floodplain from inappropriate development? Will it promote patterns of spatial development that are adaptable to and suitable for predicted changes in climate change? Will it help to minimise the risk of flooding to people and property in new and existing developments? Will it ensure that new development does not give rise to flood risk elsewhere? Will it promote sustainable drainage systems where appropriate? Will it (development) improve and/or reduce flood risk (betterment and flood risk reduction opportunities)?
5. To reduce the causes of and adapt to the impacts of climate change.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases? Will it promote patterns of spatial development that are adaptable to and suitable for predicted changes in climate? Will the plan promote measures to mitigate the causes of climate change? Will it support the delivery of renewable and low carbon energy and reduce dependency on non-renewable sources? Will it encourage opportunities for the production of renewable and low carbon energy? Will it promote greater energy efficiency?

SA Objective

Guide Questions

	<ul style="list-style-type: none"> • Will it encourage opportunities to achieve energy efficiency measures above the minimum building regulations standard? • Will it encourage innovative and environmentally friendly technologies? • Will it encourage water efficiency targets above building regulations?
6. To conserve and enhance biodiversity and geodiversity and promote improvements to the green infrastructure network.	<ul style="list-style-type: none"> • Will it help to safeguard the District's biodiversity and geodiversity? • Will it provide opportunities to enhance local biodiversity/geodiversity in both urban and rural areas? • Will it help to achieve targets set out in the Biodiversity and Geodiversity Action Plans? • Will it protect sites and habitats designated for nature conservation including protected species? • Will it enhance ecological connectivity and maintain and improve the green infrastructure network? • Will it provide opportunities for people to access the natural environment?
7. To conserve and enhance landscape character and townscape.	<ul style="list-style-type: none"> • Will it conserve and enhance landscape character and townscape? • Will it promote high quality design in context with its urban and rural landscape? • Will it protect and improve the distinctive local character of the District?
8. To conserve and enhance the historic environment, cultural heritage, character and setting.	<ul style="list-style-type: none"> • Will it preserve, protect and enhance conservation areas, listed buildings, archaeological remains, historic parks and gardens and their settings and other features and areas of historic and cultural value? (i.e. designated and non-designated heritage assets) • Will it tackle heritage assets identified as being 'at risk'? • Will it improve the quality of the built environment? • Will it make the most of opportunities to proactively enhance the contribution that the historic environment makes to quality of life and other elements of the local plan?
9. To improve the health and well-being of the population and reduce inequalities in health.	<ul style="list-style-type: none"> • Will it improve access to health facilities? • Will it help to improve quality of life for residents? • Will it promote healthier lifestyles? • Will it mitigate against noise pollution? • Will it mitigate against light pollution? • Will it seek to provide high quality well designed environments? • Will it maintain and improve access to open space, leisure and recreational facilities? • Will it promote mixed developments that encourages natural surveillance? • Will it promote community safety? • Will it reduce actual levels of crime and anti-social behaviour? • Will it reduce the fear of crime? • Will it promote design that discourages crime?
10. To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community.	<ul style="list-style-type: none"> • Will it incorporate consultation with local communities? • Will it promote wider community engagement and civic responsibility?
11. To provide decent affordable housing for all, of the right quality	<ul style="list-style-type: none"> • Will it provide opportunities to increase affordable housing levels within urban and rural areas of the District?

SA Objective

Guide Questions

and tenure and for local needs, in a clean, safe and pleasant local environment.

- Will it support the provision of a range of house types, tenures and sizes to meet the needs of all part of the community?
- Will it seek to provide high quality well designed homes and residential environments?
- Will it provide housing in sustainable locations that allow easy access to a range of local services and facilities?
- Will it provide opportunities for the construction of sustainable homes?

12. To improve the vitality and viability of Town Centres, other centres and communities and the quality of, and equitable access to, local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment

- Will it maintain and enhance the provision of local services and facilities?
- Will it contribute to rural service provision across the District?
- Will it enhance the viability and vitality of Bromsgrove town centre and local centres across the District?
- Will it enhance accessibility to services by public transport?
- Will it tackle deprivation in the most deprived areas and reduce inequalities in access to education, employment and services?

13. To develop a knowledge driven economy which supports the development of new technologies of high value, accompanied by supporting the infrastructure, whilst ensuring all share the benefits, whether urban and rural.

- Will it contribute towards urban and rural regeneration?
- Will it promote and support the development of innovative and knowledge-based technologies of high value and low environmental impact?
- Will it support expansion of the manufacturing sector?
- Will it provide opportunities for existing and new businesses to grow and develop to enhance their competitiveness?
- Will it provide sufficient employment land in locations that are attractive to the market and well-served by transport and other infrastructure?
- Will it provide good quality, well paid employment opportunities that meet the needs of local people?

14. To raise the skill levels and qualifications of the workforce and the quality of education for all.

- Will it promote investment in educational establishments to meet the changing demands of the population and economy?
- Will it improve access to training to raise employment potential?
- Will it provide, support and improve access to high quality educational facilities?
- Will it help to raise educational attainment and skills?

15. To increase sustainable travel choices and move towards more sustainable travel patterns.

- Will it reduce the need to travel?
- Will it provide opportunities to increase sustainable modes of travel?
- Will it focus development in existing centres, and make use of existing infrastructure to reduce the need to travel?
- Will it support investment in transport infrastructure?

The District Plan Vision and Spatial Principles have been assessed for their compatibility with the SA Objectives above. Other elements of the Issues and Options document have been appraised using matrices to identify likely significant effects on the SA Objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 2**.

Table NTS 2 Scoring System Used in the Appraisal of the Draft District Plan

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

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

Section 4 of this SA Report provides further information concerning the approach to the appraisal of the Issues and Options Document.

What are the Findings of the Appraisal of the Draft Issues and Options Document?

Vision and Objectives

It is important that the Vision and Objectives of the District Plan are aligned with the SA Objectives. The Vision and Objectives contained in the District Plan Review Issues and Options document (see Section 5) have therefore been appraised for their compatibility with the objectives that comprise the SA Framework to help establish whether the proposed general approach to the District Plan Review is in accordance with the principles of sustainability. A compatibility matrix has been used to record the appraisal, see **Table NTS.3**.

The Vision for the District seeks to deliver sustainable and prosperous, safe and healthy communities, whilst also looking to preserve the attractiveness of the district. The Vision is compatible with a number of the SA Objectives as it will help to foster community participation (SA Objective 10) in the District, deliver new housing (SA Objective 11), ensure a vibrant town centre (SA Objective 12), support the economy (SA Objective 13) and support education (SA Objective 14).

Overall, the Vision leaves room for a number of uncertainties as potential conflicts could arise between growth, resource use and environmental factors. The effects are highly dependent on whether growth can be achieved through balancing economic, social and environmental sustainability factors. The uncertainties and

conflicts identified are common to this exercise and no changes to the vision are suggested as a result of this appraisal.

The Issues and Options Document objectives are broad ranging spanning key socio-economic and environmental themes. As a result, none of the Issues and Options Document objectives have been assessed as being incompatible with all of the SA Objectives whilst compatibilities have been identified with each SA Objective.

As shown in NTS.3, those SA Objectives that are particularly well supported by the Issues and Options Document objectives include SA Objective 2 (land use), community participation (SA Objective 10), town centre vitality (SA Objective 12), and economy (SA Objective 13). This broadly reflects the emphasis of the Issues and Options Document objectives on the delivery of sustainable growth to meet local needs, whilst also protecting and enhancing the environment.

The results of the exercise do not suggest that any of the proposed Strategic Objectives require amendment.

The full compatibility assessment is presented in Section 6.2 of the SA Report.

Key to Table NTS.3⁶

+	Compatible	?	Uncertain	0	Neutral	-	Incompatible
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Table NTS.3 Compatibility Matrix

SA Objective	District Plan Vision and Strategic Objectives												
	Vision	SO1 – Regeneration of Bromsgrove Town Centre	SO2 – Focus Development in Sustainable Locations	SO3 – Vitality and Viability of Local Centres	SO4 – Housing Types and Tenures	SO5 – Economic Growth	SO6 – Sustainable Modes of Travel and Modal Shift	SO7 – Improving Quality of Life	SO8 – Protection of historic and natural environment	SO9 – Safeguard and Enhance Districts Natural Resources	SO10 – Mitigating and Adapting to Impacts of Climate Change	SO11 – High Quality Design of New Developments	SO12 – Community Pride
1. Water, Soil and Air Quality.	+/-	0	+	+/-	+/-	+/-	0	0	+	+	+	0	0
2. Land Use.	+/-	+	+	+	0	+	0	0	+	+	0	+	0
3. Waste:	-	+	+	+	0	0	+	0	0	+	0	+	0

⁶ Note that where more than one symbol/colour is presented in a box in Table NTS.3 it indicates that the appraisal has identified both compatibilities and incompatibilities between the Vision/Spatial Principles and the SA objectives. Where a box is coloured but also contains a '?', this indicates a degree of uncertainty regarding the relationship between the Vision/Strategic Objectives and the SA objectives although a professional judgement is expressed in the colour used.

SA Objective	District Plan Vision and Strategic Objectives												
	Vision	SO1 – Regeneration of Bromsgrove Town Centre	SO2 – Focus Development in Sustainable Locations	SO3 – Vitality and Viability of Local Centres	SO4 – Housing Types and Tenures	SO5 – Economic Growth	SO6 – Sustainable Modes of Travel and Modal Shift	SO7 – Improving Quality of Life	SO8 – Protection of historic and natural environment	SO9 – Safeguard and Enhance Districts Natural Resources	SO10 – Mitigating and Adapting to Impacts of Climate Change	SO11 – High Quality Design of New Developments	SO12 – Community Pride
4. Flood Risk:	+/?	+	+	+	0	0/?	0	0	0	0	+	0	0
5. Climate Change:	+/-	+/?	+	+/-	+/-	+/-	+	0	0	0	+	+	0
6. Biodiversity.	+/?	?	+	0	?	?	0	0	+	+	+	0	0
7. Landscape:	+/?	?	+	+	?	?	0	0	+	+	0	+	0
8. Cultural Heritage:	+/?	?	+	+/?	?	?	0	0	+	0	0	+	0
9. Health and well-being	+/-	+	+	+/-	+/-	+/-	+	+	+	0	+	0	0
10. Community Participation.	+	+	+	+	+	+	+	+	0	0	0	0	+
11. Housing.	+	0	+	0	+	0	0	0	-	0	-	+	0
12. Town Centre Vitality and Community Facilities and Services.	+	+	+	+	+	+	0	+	0	0	0	+	0
13. Economy.	+	+	+	+	0	+	+	0	-	0	-	0	0

SA Objective	District Plan Vision and Strategic Objectives												
	Vision	SO1 – Regeneration of Bromsgrove Town Centre	SO2 – Focus Development in Sustainable Locations	SO3 – Vitality and Viability of Local Centres	SO4 – Housing Types and Tenures	SO5 – Economic Growth	SO6 – Sustainable Modes of Travel and Modal Shift	SO7 – Improving Quality of Life	SO8 – Protection of historic and natural environment	SO9 – Safeguard and Enhance Districts Natural Resources	SO10 – Mitigating and Adapting to Impacts of Climate Change	SO11 – High Quality Design of New Developments	SO12 – Community Pride
14. Education.	+	+	+	+	0	0	0	+	0	0	0	0	0
15. Travel.	+/-	+	+/-	+/-	+/-	+/-	+	+	0	0	0	0	0

Issues and Options

The strategic issues identified in the Issues and Options Document are:

- 1: Scale and timeframe of the new Plan;
- 2: Growing the economy and provision of strategic infrastructure;
- 3: Broad Options for Development Distribution and allocating land uses; and
- 4: Co-operating with the West Midlands Conurbation to address wider development needs; and
- 5: Re-balancing the housing market.

The District Plan Review will need to test a number of Development Distribution Options before progressing with the most appropriate development strategy for the District. Once the scale of development needed and the timescale covered is determined, it is highly likely that a combination of options will be used. Broad Options referred to under strategic issue 3 have been considered in this SA are as follows:

- Option 1: Focus development on Bromsgrove town;
- Option 2: Focus development on transport corridors and/or locations with good transport links;
- Option 3: Focus development on the Large Settlements, as identified in the existing District Plan;
- Option 4: Disperse development around the District, allocating some new growth to a variety of settlements to allow them to grow;
- Option 5: Focus development on the edge of the West Midlands conurbation, along the border with Solihull/Birmingham/Dudley;
- Option 6: Focus development on the edge of Redditch;
- Option 7: A new settlement;
- Option 8: Reconsideration of existing unconsented allocations; on the boundary with Redditch Borough and
- Option 9: Urban intensification.

Table NTS.4 summarises the results of the SA of the Broad Options for Development Distribution. The key to the table is set out in **Table NTS.2**.

Table NTS.4 Summary of SA of the Broad Options for Development Distribution

SA OBJECTIVES	1. Focus Development on Bromsgrove Town	2. Focus Development on Transport Corridors and/or Locations with Good Transport Links	3. Focus Development on the Large Settlements	4. Disperse Development Around the District	5. Focus Development on the Edge of the West Midlands Conurbation	6. Focus Development on the Edge of Redditch	7. New Settlement	8. Reconsideration of Existing Unconsented Allocations on the Boundary with Redditch Borough	9. Urban Intensification
1. Water, Soil and Air Quality	++/+/-/-/?	++/+/-/-/?	++/+/-/-/?	++/+/-/-/?	++/+/-/-/?	++/-/-/?	++/-/-/?	++/-/-/?	++/+/-/-/?
2. Land Use	++/-/?	++/+/-/?	++/+/-/?	++/+/-/?	++/+/-/?	--/?	--/?	++/-/?	++/+/-
3. Waste	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
4. Flood Risk	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--
5. Climate Change	++/--	++/--	++/--	++/--	++/-/?	++/--	++/--	++/--	--/++
6. Biodiversity	++/-/-/?	++/-/-/?	++/-/-/?	++/-/-/?	++/-/?	++/-/-/?	++/-/?	++/-/-/?	+/-/-/?
7. Landscape	--	--	--	--	--	--	--	--	++/--
8. Cultural Heritage	?	?	?	?	?	?	?	?	?
9. Health and Well-being	++	++/?	++	++/?	++/?	++/?	++/?	++/?	++/-?
10. Community Participation	0	0	0	0	0	0	0	0	0
11. Housing	++	++	++	++	++	++	++	++	++/?
12. Town Centre Vitality and Community Facilities and Services	++	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?
13. Economy	++/?	++/?	++/?	++/?	++/?	++/?	++/?	0	?

SA OBJECTIVES	1. Focus Development on Bromsgrove Town	2. Focus Development on Transport Corridors and/or Locations with Good Transport Links	3. Focus Development on the Large Settlements	4. Disperse Development Around the District	5. Focus Development on the Edge of the West Midlands Conurbation	6. Focus Development on the Edge of Redditch	7. New Settlement	8. Reconsideration of Existing Unconsented Allocations on the Boundary with Redditch Borough	9. Urban Intensification
14. Education	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?
15. Travel	++/-/?	++/-/?	++/-/?	++/-/?	++/-/?	++/-/?	++/-/?	++/-/?	++/-/?

In summary the SA of the Options indicates that:

- All Options have significant positive effects in relation to housing (SA Objective 11) but there are uncertainties around the contribution that Option 9 'Intensification' could make in the absence of additional information on the capacity of settlements to accommodate additional growth at higher densities. The same comment applies to the majority of the other Options, although Option 8 is easier to quantify because it involves two existing strategic allocations;
- All options will give rise to increase waste and a minor negative effect is identified with uncertainties reflecting the impact of other policies at the local and national levels;
- There are uncertainties around the contribution that all of the Options could make to meeting SA Objective 13 'Economy' because the objective is focussed specifically on the development of a knowledge driven economy. Activities that fall within this sector are likely to have specific locational requirements and the ability of Options to provide these may vary. The potential for significant positive effects is identified as locations near Bromsgrove Town and the larger settlements in the District would provide sustainable locations for such development, however the scale and location of developments is uncertain at this stage. A more dispersed pattern of development might involve the provision of smaller employment sites, which could limit benefits associated with firms clustering together on larger employment sites;
- In the absence of mitigation, all Options have the potential to impact on waste (SA Objective 4) flood risk (SA Objective 4), biodiversity (SA Objective 6), landscape/townscape (SA Objective 7) and cultural heritage (SA Objective 8) – the significance of effects will reflect the scale of development envisaged;
- The current District Plan is largely based on a strategy of expanding existing facilities, e.g. schools and health facilities. The ability to continue this approach is uncertain now but will be investigated through the Infrastructure Delivery Plan. If this strategy continues it will make the proximity of new sites to existing facilities and access to alternatives to the car important considerations (SA Objectives 9 'Health and Well-being, 12 'Town Centre Vitality and Community Facilities and Services, 14 'Education and 15 'Travel'). The potential for a minor negative effect in relation to SA Objective 15 'Travel' is also identified as all options will result in additional vehicle movements.

Some Options might perform better than others in terms of supporting existing town centres within the District and providing access to facilities and services. The dispersal strategy might dilute this effect, e.g. new residents in more peripheral settlements might gravitate to other towns outside of the District like Kidderminster or Redditch. Uncertainties are also identified because the dispersal strategy could result in development in relatively isolated locations with reliance on the car.

Policy options were also appraised under a series of other topics, including housing and employment. These are high level options about the direction that policy might take and at this initial stage the results are commensurately high level. Given the nature of the options there is little to differentiate them in SA terms but some recommendations have come out of the SA and these are summarised in **Table NTS.5** below.

The results of the initial SA of all high level options are set out in Section 6 of the SA Report

Mitigation and Enhancement

The SA is being undertaken iteratively alongside and informing the development of the District Plan. In this context several mitigation measures have been identified in this SA Report for the Council's consideration for the next stage of the District Plan development.

Table **NTS.5** sets out recommendations from the appraisal of the issues and options document. The Council will be asked to consider these recommendations as it develops the District Plan. The Council is not obliged to accept the recommendations.

Table NTS.5 Recommendations from the SA

Recommendation
District Plan policies to require water conservation measures in built development, including the need for higher standards where there is evidence of water stress, now or over the plan period.
District Plan to require use of soil management plans.
District Plan policies should include policies to help optimise the use of previously developed land and buildings.
District Plan to promote air quality neutral development where justified.
District Plan policies could encourage voluntary use of the Home Quality Mark. ⁷
The District Plan should encourage minerals to be worked prior to development where possible.
Opportunities should be sought to minimise the creation of construction waste using design, materials selection and onsite and offsite reuse.
District Plan policies to require the use of sustainable urban drainage where suitable.
District Plan policies to encourage residential developments to incorporate renewable energy schemes and electric vehicle charging points.
District Plan policies to encourage developments to secure a net gain in biodiversity.
District Plan to require development sites to incorporate Green Infrastructure/structural landscaping that will help reduce landscape and visual impacts.

⁷ <https://www.homequalitymark.com/what-is-the-hqm>

Recommendation

District Plan to be informed by Heritage Impact Assessment of potential sites.

District Plan to include policies in relation to over concentration of fast food outlets if justified.

Strategic sites to be informed by Health Impact Assessment.

District Plan could include policy in relation to provision of apprenticeships associated with the construction of new housing in the District.

District Plan policies to encourage Lifetime Homes and Lifetime Neighbourhoods

District Plan to ensure that a range of sites are provided in terms of size and market attractiveness, including sites to meet knowledge based activities.

District Plan to adopt the 'agent of change' principle (as set out in the NPPF).

District Plan to include a policy that encourages the dual use of community facilities.

The District to include a policy to secure positive use of the Green Belt

The District Plan to identify the need to safeguard existing aquifer and water quality.

District Plan to require silica sand to be worked prior to development where this is feasible.

District Plan policies to encourage local procurement, training and recruitment.

District Plan to advocate that major housing-led developments adopt Garden-Village Principles

Next Steps

This NTS and the SA Report are being issued for consultation alongside the Draft District Plan. The consultation will run from **24th September to 5.00pm on the 19th of November 2018**. The SA Report, together with the consultation responses received, will then be used to inform the development of the next stage of the District Plan which will be the Preferred Options Draft.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of this SA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

Please provide your comments by 5.00pm on the 19th of November. Comments should be sent:

Using the online form available at: www.bromsgrove.gov.uk/districtplan

By email: strategicplanning@bromsgroveandredditch.gov.uk

By post: Strategic Planning Team, Bromsgrove District Council, Town Hall, Walter Stranz Square, Redditch, Worcestershire, B98 8AH

Contents

1.	Introduction	24
1.1	Overview	24
1.2	Purpose of this SA Report	24
1.3	The Bromsgrove District Plan Review – An Overview	25
1.4	Stages in the Sustainability Appraisal Process	28
1.5	Habitats Regulations Assessment	29
1.6	Structure of this Report	30
2.	Review of Plans and Programmes	32
2.1	Introduction	32
2.2	Review of Plans and Programmes	32
2.3	Key Messages	35
3.	Baseline Analysis	39
3.1	Introduction	39
3.2	Bromsgrove District: An Overview	39
3.3	Soils and Land Use, Water Resources and Water Quality	40
3.4	Air Quality, Waste, Pollution and Energy, Flood Risk and Climate Change	45
3.5	Biodiversity, Geodiversity and Green Infrastructure	60
3.6	Landscape, Townscape and the Historic Environment	65
3.7	Healthy and Inclusive Communities	70
3.8	Housing	84
3.9	Economic Activity and Education	85
3.10	Transport and Accessibility	92
3.11	Key Sustainability Issues	96
4.	SA Approach	99
4.1	Introduction	99
4.2	SA Framework	99
4.3	Methodology	103
4.4	When the SA was Undertaken and by Whom	112
4.5	Difficulties Encountered in Undertaking the Appraisal	112
5.	Appraisal of the Issues and Options Document	113

5.1	Introduction	113
5.2	District Plan Vision and Objectives	113
5.3	Issues and Options	119
5.4	Strategic Issues for Bromsgrove District	119
5.5	Housing	128
5.6	Employment	132
5.7	Transport	135
5.8	Town Centre and Local Centres	135
5.9	Social Infrastructure	135
5.10	Natural Environment	136
5.11	Historic Environment	136
5.12	Climate Change and Water Resources	137
5.13	Green Belt	137
5.14	Recommendations	138
5.15	Cumulative, Synergistic and Secondary Effects	139

6. Conclusions, Monitoring and Next Steps 140

6.1	Conclusions	140
6.2	Monitoring	140
6.3	Consulting on this SA Report	141
6.4	Next Steps	141

Table 1.1	Indicative District Plan Preparation Milestones	27
Table 2.1	Plans and Programmes Reviewed for the SA of the District Plan	32
Table 2.2	Key Messages Arising from Review of Plans and Programmes	36
Table 3.1	Percentage of Dwellings Completed on Brownfield/Greenfield Land	41
Table 3.2	Waste Collection in Bromsgrove District	50
Table 3.3	Domestic Energy Consumption in the District	52
Table 3.4	Commercial and Industrial Energy Consumption in the District	52
Table 3.5	CO ₂ Emissions Per Capita 2010-2015 (tonnes CO ₂ per person)	56
Table 3.6	Per Capita CO ₂ Emissions by Source 2010-2015 (tonnes CO ₂ per person)	57
Table 3.7	West Midlands Climate Predictions (medium emissions scenario)	59
Table 3.8	Condition of SSSIs within Bromsgrove District	62
Table 3.9	Condition of Geological SSSIs within Bromsgrove District	63
Table 3.10	Priorities from the Worcestershire Green Infrastructure Strategy	64
Table 3.11	Ward Density	71
Table 3.12	State of Health in Bromsgrove 2001-2011	74
Table 3.13	A1 Retail Uses in Bromsgrove	79
Table 3.14	Vacant Units in Bromsgrove	79
Table 3.15	Type and Number of Open Spaces in Bromsgrove	80
Table 3.16	Population Change by Age Range 2011-2039	82
Table 3.17	Number of Applicants on Council's Housing Waiting List by Banding, February 2018	85
Table 3.18	Total Number of Enterprises in Bromsgrove District 2010-2017	87
Table 3.19	Bromsgrove District Employment Land Supply, April 2017	88
Table 3.20	Overall school performance at end of key stage 4 (2017)	91
Table 3.21	Distances Travelled to Work	94
Table 3.22	Key Sustainability Issues	96
Table 4.1	Sustainability Appraisal Framework	99
Table 4.2	Coverage of the SEA Directive Topics by the SA Objectives	102
Table 4.3	Vision and Objectives Compatibility Matrix	103

Table 4.4	Appraisal Matrix – Broad Options for Development Distribution	105
Table 4.5	Proposed Scoring System	105
Table 4.6	Proposed Appraisal Matrix - Policies	106
Table 4.7	Proposed Site Appraisal Criteria – Housing and Employment	108
Table 5.1	Compatibility Matrix	117
Table 5.2	Summary of SA of the Spatial Options	121
Table 5.3	Recommendations from the SA	138

Figure 1.1	Stages in the Sustainability Appraisal Process	29
Figure 3.1	Bromsgrove District Plan Key Diagram	40
Figure 3.2	Agricultural Land Classifications in Bromsgrove and Surrounding Area	42
Figure 3.3	Air Quality Monitoring Areas in Bromsgrove	47
Figure 3.4	Noise Levels in the Vicinity of Bromsgrove Town	51
Figure 3.5	Major Watercourses and Flood Zones in Bromsgrove District and Adjacent Areas	55
Figure 3.6	CO ₂ Emissions from Road Transport in Bromsgrove District and Adjacent Areas	57
Figure 3.7	Designated Nature Conservation Sites Within and in Proximity to Bromsgrove District	61
Figure 3.8	Green Belt in Bromsgrove	67
Figure 3.9	Population Structure: Census 2011	71
Figure 3.10	Indices of Deprivation 2015	75
Figure 3.11	Crime Rates in Bromsgrove and Nationally	76
Figure 3.12	Crime Plus ASB Breakdown - Bromsgrove District Council	77
Figure 3.13	Crime Plus ASB Breakdown – National	77
Figure 3.14	Bromsgrove Town Centre Vacant Units	89

1. Introduction

1.1 Overview

- 1.1.1 Bromsgrove District Council (the Council) is currently undertaking a review of the adopted Bromsgrove District Plan. The District Plan Review will set out the Vision, objectives, planning policies and site allocations that will guide development in the District for at least a 15-year period from adoption of the District Plan. Wood has been commissioned by the Council to undertake a Sustainability Appraisal (SA) of the District Plan.
- 1.1.2 The SA will appraise the environmental, social and economic performance of the District Plan and any reasonable alternatives. In doing so, it will help to inform the selection of Plan Options concerning (in particular) the quantum, distribution and location of future development in the District and identify measures to avoid, minimise or mitigate any potential negative effects that may arise from the Plan's implementation as well as opportunities to improve the contribution of the District Plan towards sustainability.

1.2 Purpose of this SA Report

- 1.2.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the District Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the Strategic Environmental Assessment (SEA) Directive, and its transposing regulations the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633) (the SEA Regulations).
- 1.2.2 The SEA Directive and transposing regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the SEA Directive is *"to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."*
- 1.2.3 At paragraph 16, the National Planning Policy Framework (NPPF) (2018) sets out that local plans should be prepared with the objective of contributing to the achievement of sustainable development⁸ In this context, paragraph 32 of the NPPF reiterates the requirement for SA/SEA as it relates to local plan preparation:
- "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.⁹ This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities*

⁸ This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act, 2004) .

⁹ The reference to relevant legal requirements in the NPPF relates to Strategic Environmental Assessment

for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).."

1.2.4 The Planning Practice Guidance (2014) also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA helps to ensure that a local plan is "justified", a key test of soundness that concerns the extent to which the plan is the most appropriate strategy, when considered against the reasonable alternatives and available and proportionate evidence.

1.2.5 Through an ongoing and iterative appraisal process, the SA of the Bromsgrove District Plan is supporting the development and refinement of the Plan by appraising the sustainability strengths and weaknesses of emerging policy and proposals. The SA process is seeking to promote the integration of sustainability considerations into the preparation of the Local Plan and the selection and refinement of preferred options. Specifically, this SA Report sets out:

- An overview of the emerging Bromsgrove District Plan;
- A review of relevant international, national, regional, sub-regional and local plans, policies and programmes;
- Baseline information for the Local Plan area across key sustainability topics;
- Key economic, social and environmental issues relevant to the appraisal of the plan;
- The approach to undertaking the appraisal of the Bromsgrove District Plan;
- The findings of the appraisal of the Issues and Options Consultation Document; and
- Conclusions and an overview of the next steps in the SA process.

1.3 The Bromsgrove District Plan Review – An Overview

Requirement to Prepare a Local Plan

1.3.1 Paragraph 15 of the NPPF states that the planning system should be genuinely plan-led. Paragraph 20 states that Local Plans should include strategic policies that set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision (in line with the presumption in favour of sustainable development) for:

"a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

1.3.2 Planning Practice Guidance clarifies (at paragraph 002 'Local Plans') that local plans "should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered".

Scope and Content of the Bromsgrove District Plan Review

- 1.3.3 The current planning policies for Bromsgrove District can be found in the Bromsgrove District Plan (BDP) (2011-2030), which was adopted in January 2017 and caveated with a need to undertake a Plan Review by 2023 (Policy BDP3) as the Council was unable to allocate sufficient housing land in locations not covered by Green Belt designation. The Plan Review is needed to ensure that the full housing requirement for Bromsgrove District up to 2030 and beyond can be delivered. Furthermore, Bromsgrove District Council has a duty to consider whether there are any realistic options to assist the West Midlands conurbation in meeting its current housing shortfall. As Green Belt boundaries should only be altered as part of plan preparation or review, and only in exceptional circumstances (NPPF para 135), the Council is taking this opportunity to review the District Plan in its entirety and to extend its longevity.
- 1.3.4 The new District Plan will incorporate strategic policies, development management policies and other site allocations and the District Plan will also:
- Provide the planning principles, including detailed development management policies to guide future development and planning decisions beyond 2030;
 - Set the general scale and distribution of new development which is required to meet Bromsgrove's needs up to and beyond 2030;
 - Include strategic allocations as well as detailed land allocations and designations;
 - Include site specific proposals for the development, protection and conservation of land;
 - Contribute to achieving sustainable development;
 - Include a monitoring and implementation framework;
 - Have regard to any other issues to meet Government, or other emerging policy areas;
 - Be produced through on-going co-operation with neighbouring authorities and other bodies to reflect issues and sites that are wider than District level; and
 - Be produced through a consultative process so that the Plan reflects the collective Vision of communities in the District.

Preparation of the District Plan Review

- 1.3.5 The Council's approved Local Development Scheme (LDS) sets out the timetable for production of the District Plan in accordance with the requirements for plan production set out in The Town and Country Planning (Local Planning) (England) Regulations 2012). The plan preparation stages are detailed in **Table 1.1** below.
- 1.3.6 The timetable for the District Plan Review is set out in the Council's Local Development Scheme (LDS) which can be viewed on the Council's website. It is unlikely that the Council will be able to keep to the current timetable, therefore the LDS needs to be updated and re-published, explaining any alterations. However, the Council have decided to wait until after the close of this consultation so it can gauge the extent of the responses received. This is especially critical in relation to responses relating to the evidence base methodologies. Until the methodologies have been refined and endorsed, the Council cannot undertake the actual assessment work, therefore it is difficult to update the LDS timeframe at this point in time.

Table 1.1 Stages of Plan Preparation

Stage of Plan Preparation
Consult on draft SA Scoping Report with appropriate consultation bodies
Preparation of Issues and Options Document
Issues and Options Consultation
Preparation of Preferred Options Document
Preferred Options Consultation
Preparation of Pre-Submission Document
Pre-Submission Consultation
Submission to Planning Inspectorate
Commencement of Examination
Receipt of Inspector's Report
Adoption

- 1.3.7 Adoption of the District Plan is due to take place in January 2021. This will be preceded by three principal periods of consultation during which the District Plan will be developed and refined taking into account (*inter-alia*) national planning policy and guidance, the Council's evidence base, the outcomes of consultation and the findings of socio-economic and environmental assessments and appraisal including SA, prior to submission to the Secretary of State and subsequent Examination in Public.

The Draft Issues and Options Document for Consultation

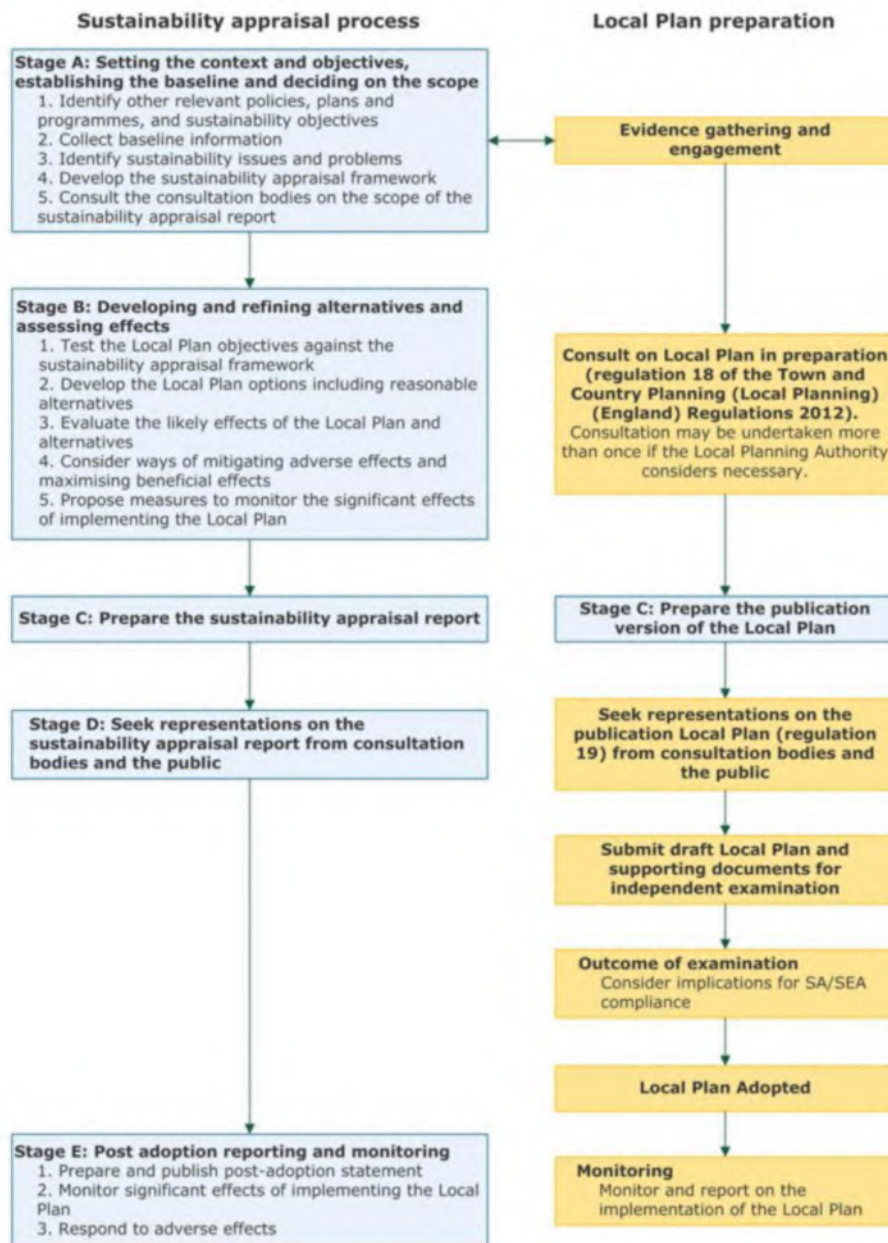
- 1.3.8 The Draft Issues and Options Document comprises of the following core components:

- An overview of the District and background to the review of the District Plan;
- The proposed Vision and Strategic Objectives for the District Plan;
- Issues and Options for selected topics;
 - Strategic Issues for Bromsgrove District;
 - Housing;
 - Employment;
 - Transport;
 - Town Centre and Local Centres;
 - Social infrastructure;
 - Natural environment;
 - Historic Environment; and
 - Climate change and water resources.

1.4 Stages in the Sustainability Appraisal Process

- 1.4.1 There are five key stages in the SA process and these are highlighted in **Figure 1.1** below together with links to the development of the District Plan.
- 1.4.2 The first stage (**Stage A**) led to the production of a SA Scoping Report. Informed by a review of other relevant policies, plans and programmes as well as baseline information and the identification of key sustainability issues affecting the District, the Scoping Report set out the proposed framework for the appraisal of the District Plan (the SA Framework).
- 1.4.3 The Scoping Report was subject to consultation that ran from 15th March to 19th April 2018. A total of 4 responses were received to the consultation from the statutory SEA consultation bodies (Natural England, the Environment Agency and Historic England) and one Parish council. Responses related to all aspects of the Scoping Report and resulted in amendments to the SA Framework. **Appendix B** contains a schedule of the consultation responses received to the Scoping Report, the response and the subsequent action taken.
- 1.4.4 **Stage B** is an iterative process involving the ongoing appraisal and refinement of the District Plan. In this context the Draft District Plan has been subject to SA.
- 1.4.5 This report has been prepared as a part of Stage B of the SA and considers the effects of the Issues and Options Draft District Plan. It is being published for consultation alongside the District Plan Review Issues and Options itself.
- 1.4.6 Subsequent reports will be prepared as a part of **Stage C** of the SA and will consider the effects of the Preferred Options, Publication and Submission Draft District Plan stages. The Preferred Options SA will be published for consultation alongside the Preferred Options District Plan, the Publication SA will be published for consultation alongside the Publication Draft District Plan and the Submission SA will be published for consultation alongside the Submission Draft District Plan itself prior to consideration by an independent Planning Inspector (**Stage D**).
- 1.4.7 Following Examination in Public (EiP), and subject to any significant changes to the Submission District Plan that may require appraisal as a result of the EiP, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the District Plan. This will set out the results of the consultation and SA process and the extent to which the findings of the SA have been accommodated in the adopted District Plan. During the period of the District Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

Figure 1.1 Stages in the Sustainability Appraisal Process



Source: Department for Communities and Local Government (DCLG) (2014) *Planning Practice Guidance*.

1.5 Habitats Regulations Assessment

1.5.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the '*Habitats Regulations*') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any 'likely significant effects' (LSE) on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives. The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment' (HRA).

1.5.2 In accordance with the Habitats Regulations, what is commonly referred to as a HRA screening exercise will be undertaken to identify the likely impacts of the emerging District Plan upon

European sites, either alone or 'in combination' with other projects or plans, and to consider whether these effects are likely to be significant. Where the possibility of significant effects cannot be excluded, a more detailed Appropriate Assessment (AA) is carried out to determine whether these effects would adversely affect the integrity of European sites.

- 1.5.3 The HRA screening exercise will be reported separately from the SA of the District Plan and will be used to help inform the appraisal process, particularly in respect of the potential effects of proposals on biodiversity.

1.6 Structure of this Report

- 1.6.1 This SA Report is structured as follows:

- **Non-Technical Summary** - Provides a summary of the SA Report including the findings of the appraisal of the Issues and Options Document;
- **Section 1: Introduction** - Includes a summary of the Issues and Options Document, an overview of SA, report contents and an outline of how to respond to the consultation;
- **Section 2: Review of Plans and Programmes** - Provides an overview of the review of those plans and programmes relevant to the District Plan and SA. The full review is contained at **Appendix C**;
- **Section 3: Baseline Analysis** - Presents the baseline analysis of the District's social, economic and environmental characteristics and identifies the key sustainability issues that have informed the SA Framework and appraisal;
- **Section 4: SA Approach** - Outlines the approach to the SA of the Issues and Options Document including the SA Framework;
- **Section 5: Appraisal of the Issues and Options Document** - Presents a summary of the findings of the appraisal of the Issues and Options document for consultation (with the full appraisal matrices contained in **Appendix D**); and
- **Section 6: Conclusions, Monitoring and Next Steps** - Presents the conclusions of the SA of the Issues and Options Document, discusses the requirement for monitoring and details of the next steps in the appraisal process.

- 1.6.2 The Appendices are presented in a separate document.

- 1.6.3 This SA Report has been prepared in accordance with the reporting requirements of the SEA Directive and associated Regulations. A Quality Assurance Checklist is presented at **Appendix A**.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of this SA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

Please provide your comments by 5.00pm on the 19th of November. Comments should be sent:

Using the online form available at: www.bromsgrove.gov.uk/districtplan

By email: strategicplanning@bromsgroveandredditch.gov.uk

By post: Strategic Planning Team, Bromsgrove District Council, Town Hall, Walter Stranz Square, Redditch, Worcestershire, B98 8AH

2. Review of Plans and Programmes

2.1 Introduction

2.1.1 One of the first steps in undertaking SA is to identify and review other relevant plans and programmes that could influence the District Plan. The requirement to undertake a plan and programme review and identify the environmental and wider sustainability objectives relevant to the plan being assessed is set out in the SEA Directive. An 'Environmental Report' required under the SEA Directive should include:

"An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" to determine "the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme...and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex 1 (a), (e)).

2.1.2 Plans and programmes relevant to the District Plan may be those at an international/European, UK, national, regional, sub-regional or local level, as relevant to the scope of the document. The review of relevant plans and programmes aims to identify the relationships between the District Plan and these other documents i.e. how the District Plan could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of their sustainability objectives. The review also ensures that the relevant environmental protection and sustainability objectives are integrated into the SA. Additionally, reviewing plans and programmes can provide appropriate information on the baseline for the plan area and help identify the key sustainability issues.

2.1.3 The SA Scoping Report included a review of plans and programmes, consistent with the requirements of the SEA Directive, and which was used to inform the development of the SA Framework. This review has been updated as part of the preparation of this SA Report in order to reflect any additional, relevant plans and programmes published since consultation on the Scoping Report took place.

2.2 Review of Plans and Programmes

2.2.1 A total of 134 international, national, regional/sub-regional and local level plans and programmes have been reviewed in preparing this Scoping Report. These are listed in **Table 2.1**, with the results of the review provided in **Appendix B**.

Table 2.1 Plans and Programmes Reviewed for the SA of the District Plan

Plan/Programme

International/European Plans and Programmes

- European Commission (EC) (2011) A Resource- Efficient Europe- Flagship Initiative Under the Europe 2020 Strategy, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions (COM 2011/21)
- EC (2013) Strategy on Adaptation to Climate Change
- European Commission Communication (2013) Towards Social Investment for Growth and Cohesion – including implementing the European Social Fund 2014-2020
- European Landscape Convention 2000 (became binding March 2007)
- European Union (EU) Nitrates Directive (91/676/EEC)

Plan/Programme

- EU Urban Waste-water Treatment (91/271/EEC)
- EU Packaging and Packaging Waste Directive (94/62/EC)
- EU Drinking Water Directive (98/83/EC)
- EU Directive on the Landfill of Waste (99/31/EC)
- EU Water Framework Directive (2000/60/EC)
- EU 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive)
- EU Directive 2002/91/EC (2002) Directive 2002/91/EC on the Energy Performance of Buildings
- EU Environmental Noise Directive (Directive 2002/49/EC)
- EU Bathing Waters Directive 2006/7/EC
- EU (2006) Renewed EU Sustainable Development Strategy
- EU Floods Directive 2007/60/EC
- EU Air Quality Directive (2008/50/EC) and previous directives (96/62/EC; 99/30/EC; 2000/69/EC & 2002/3/EC)
- EU Directive on the Conservation of Wild Birds (79/409/EEC)
- EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) & Subsequent Amendments
- EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)
- EU Renewable Energy Directive (2009/28/EC)
- EU (2006) European Employment Strategy
- EU (2011) EU Biodiversity Strategy to 2020 – towards implementation
- EU (2013) Seventh Environmental Action Programme to 2020 'Living well, within the limits of our planet'
- EU (2015) Invasive Alien Species Regulation (1143/2014/EU)
- The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention)
- The European Convention on the Protection of Archaeological Heritage (Valetta Convention)
- United Nations Climate Change Conference (UNCCC) (2011) The Cancun Agreement
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- Department for Culture, Media and Sport (DCMS) (2001) The Historic Environment: A Force for our Future
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- DCLG (2014) Planning Practice Guidance
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- DCLG (2017) Fixing Our Broken Housing Market
- Department of Energy and Climate Change (DECC) (2009) The UK Low Carbon Transition Plan: National Strategy for Climate and Energy
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- Department for Food and Rural Affairs (Defra) (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland
- Defra (2007) Strategy for England's Trees, Woods and Forests
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- Defra (2009) Safeguarding Our Soils: A Strategy for England
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- Defra (2012) UK post 2010 Biodiversity Framework
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- Defra (2013) Waste Management Plan for England
- Defra (2013) A Simple Guide to Biodiversity 2020 and Progress Update
- Defra (2013) Government Forestry and Woodlands Policy Statement
- Defra (2017) Air Quality Plan for Nitrogen Dioxide (NO₂) in UK
- Department for Education (DFE) (2014) Home to School Travel and Transport Guidance

Plan/Programme

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- Environment Agency (2013) Managing Water Extraction (updated 2016)
- Forestry Commission (2005) Trees and Woodlands Nature's Health Service
- Forestry Commission (2016) Corporate Plan 2016-2017
- HM Government (1979) Ancient Monuments and Archaeological Areas Act
- HM Government (1981) Wildlife and Countryside Act
- HM Government (1990) Planning (Listed Building and Conservation Areas) Act
- HM Government (2000) Countryside and Rights of Way Act 2000
- HM Government (2003) Sustainable Energy Act
- HM Government (2004 and revised 2006) Housing Act
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- HM Government (2006) The Natural Environment and Rural Communities (NERC) Act 2006
- HM Government (2008) The Climate Change Act 2008
- HM Government (2008) The Planning Act
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- HM Government (2010) The Government's Statement on the Historic Environment for England
- HM Government (2010) Flood and Water Management Act 2010
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- HM Government (2011) The Localism Act
- HM Government (2011) Water for Life: White Paper
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- West Midlands Combined Authority (2017) Thrive West Midlands – An Action Plan to drive better mental health and wellbeing in the West Midlands
- Environment Agency (2015) Severn River Basin District River Basin Management Plan

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- Worcestershire County Council (2009) Worcestershire Access and Informal Recreation Strategy 2009-2019
- Worcestershire County Council (2009) A Geodiversity Action Plan for Worcestershire
- Worcestershire County Council (2010) An Economic Strategy for Worcestershire 2010-2020
- Worcestershire County Council (2011) A Single Sustainable Community Strategy for Worcestershire
- Worcestershire County Council (2011) Planning for Water in Worcestershire
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- Worcester County Council (2012) Waste Core Strategy for Worcestershire 2012-2027
- Worcestershire County Council (2012) Landscape Character Assessment Supplementary Guidance
- Worcestershire County Council (2012) Climate Change Strategy 2012-2020

Plan/Programme

- Worcestershire County Council (2013) Green Infrastructure Strategy 2013-2018
- Worcestershire County Council (2014) World Class Worcestershire – Our Strategic Economic Plan
- Worcestershire County Council (2016) '1000 Days' A Strategy for the arts in Worcestershire 2016-2019
- Worcestershire County Council (2017) Shaping Worcestershire's Future 2017-2022
- Worcestershire County Council (2017) Interim Worcestershire Homeless Strategy Action Plan 2017-2018
- Worcestershire County Council (2017) Worcestershire Housing Partnership Plan 2017
- Worcestershire County Council (2018) Worcester's Local Transport Plan (LTP) 2018-2030
- Worcestershire County Council (ongoing) Emerging Minerals Local Plan
- Worcestershire County Council (Several) Habitat and Species Biodiversity Action Plans

Local Plans and Programmes (including neighbouring authority local plans). All published by Bromsgrove District Council, unless stated otherwise.

- Bromsgrove District Council and Birmingham City Council (2009) Longbridge Area Action Plan
- Bromsgrove District Council and Redditch Borough Council (2012) Level 2 Strategic Flood Risk Assessment Report
- Bromsgrove District Council (2014) Housing Land Availability Report
- Bromsgrove District Council (2014) Employment Land Availability Report
- Bromsgrove District Council (2015) Playing Pitch Strategy
- Bromsgrove District Council (2017) 5 Year Housing Land Supply in Bromsgrove District
- Bromsgrove District Council (2016) Statement of Community Involvement 2016
- Bromsgrove District Council (2017) Bromsgrove District Plan 2011-2030
- Bromsgrove District Council (2018) Draft High Quality Design SPD
- Bromsgrove District Council (Several) Supplementary Planning Guidance
- Neighbourhood Plans
- Worcestershire County Council Historic Environment and Archaeology Service (2010) Historic Environment Assessment for Bromsgrove District Council

2.3 Key Messages

2.3.1 The review of plans and programmes presented in **Appendix B** has identified a number of objectives and policy messages relevant to the District Plan and scope of the SA across the following topic areas:

- Soils and Land Use, Water Resources and Water Quality;
- Air Quality, Waste, Pollution and Energy, Flood Risk and Climate Change;
- Biodiversity, Geodiversity and Green Infrastructure;
- Landscape, Townscape and the Historic Environment;
- Healthy and Inclusive Communities;
- Housing;
- Economic Activity and Education; and
- Transport and Accessibility.

2.3.2 These messages are summarised in **Table 2.2** together with the key sources and implications for the SA Framework. Only the key sources are identified; however, it is acknowledged that many other plans and programmes could also be included.

Table 2.2 Key Messages Arising from Review of Plans and Programmes

Key Objectives and Policy Messages	Key Source(s)	Implications for the SA Framework
Soils and Land Use, Water Resources and Water Quality		
<ul style="list-style-type: none"> ● Encourage the use of previously developed (brownfield) land. ● Promote the re-use of derelict land and buildings. ● Protect soil quality and minimise the loss of Best and Most Versatile agricultural land. ● Promote high quality design. ● Avoid damage to, and protect, geologically important sites. ● Encourage mixed use development. ● Protect and enhance surface and groundwater quality. ● Improve water efficiency. 	<p>Water Framework Directive; Drinking Water Directive; Floods Directive; Flood and Water Management Act 2010; Water for Life, White Paper; NPPF; A Green Future: Our 25 Year Plan to Improve the Environment; Enhancing Biodiversity Across the West Midlands; 25 Year Environmental Plan – Opportunities for the West Midlands; A Geodiversity Action Plan for Worcestershire; Severn River Basin District River Basin Management Plan (2015); Emerging Minerals Local Plan (ongoing); Planning for Water in Worcestershire (2011).</p>	<p>The SA Framework should include objectives and/or guide questions relating to:</p> <ul style="list-style-type: none"> ● Encouraging the use of previously developed land and buildings; ● Reducing land contamination; ● Avoiding the loss of Best and Most Versatile agricultural land; ● Promoting high quality design; including mixed use development; ● Protecting and avoiding damage to geologically important sites; and ● Water quality and quantity.
Air Quality, Waste, Pollution and Energy, Flood Risk and Climate Change		
<ul style="list-style-type: none"> ● Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum. ● Avoid development in areas of flood risk. ● Reduce the risk of flooding arising from new development. ● Ensure timely investment in water management infrastructure to accommodate new development. ● Minimise the effects of climate change. ● Reduce emissions of greenhouse gases that may cause climate change. ● Encourage the provision of renewable energy. ● Move towards a low carbon economy. ● Promote the waste hierarchy (reduce, reuse, recycle, recover). ● Ensure the adequate provision of local waste management facilities. 	<p>Air Quality Directive; Air Quality Strategy for England, Scotland, Wales and Northern Ireland; Waste Framework Directive; Landfill Directive; Waste Management Plan for England; NPPF; National Planning Policy for Waste; Climate Change Act 2008; Carbon Plan: Delivering our Low Carbon Future; UK Renewable Energy Strategy; A Green Future: Our 25 Year Plan to Improve the Environment; A Vision for the West Midlands – Renewable and Energy Efficient Future; Waste Strategy for Herefordshire and Worcestershire – Managing Waste for a Brighter Future; Waste Core Strategy for Worcestershire 2012-2027; Climate Change Strategy 2012-2020; Level 2 Strategic Flood Risk Assessment;</p>	<p>The SA Framework should include a specific objective and/or guide question relating to:</p> <ul style="list-style-type: none"> ● Air Quality; ● Waste and Recycling; ● Climate Change mitigation and adaptation; ● Flooding and reducing flood risk; and ● Energy efficiency and creating a low carbon future.
Biodiversity, Geodiversity and Green Infrastructure		
<ul style="list-style-type: none"> ● Protect and enhance biodiversity, including designated sites, priority species, habitats ecological networks and nature recovery networks. ● Identify opportunities for green infrastructure provision. 	<p>Natural Environment White Paper: The Natural Choice: Securing the Value of Nature; Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services; UK post 2010 Biodiversity Framework; NPPF, Worcestershire County Council Green Infrastructure Strategy, A Geodiversity Action Plan for Worcestershire, Worcestershire Habitat and Species Biodiversity Action Plans</p>	<ul style="list-style-type: none"> ● The SA Framework should include a specific objective relating to the protection and enhancement of biodiversity including green infrastructure provision.

Key Objectives and Policy Messages	Key Source(s)	Implications for the SA Framework
Landscape, Townscape and the Historic Environment		
<ul style="list-style-type: none"> ● Conserve and enhance cultural heritage assets and their settings. ● Maintain and enhance access to cultural heritage assets. ● Respect, maintain and strengthen local character and distinctiveness. ● Improve the quality of the built environment. ● Protect and enhance the quality and distinctiveness of natural landscapes and townscapes. ● Promote access to the countryside. ● Promote high quality design that respects and enhances local character. 	<p>NPPF; A Green Future: Our 25 Year Plan to Improve the Environment; West Midlands Health & Well-Being Strategy; A Single Sustainable Community Strategy for Worcestershire; Landscape Character Assessment Supplementary Guidance; Green Infrastructure Strategy 2013-2018; Habitat and Species Biodiversity Action Plans; Bromsgrove District Plan 2011-2030; Historic Environment Assessment for Bromsgrove District Council.</p>	<ul style="list-style-type: none"> ● The SA Framework should include a specific objective relating to the conservation, protection and enhancement of the District's landscapes, built environment and historical assets and their setting.
Healthy and Inclusive Communities		
<ul style="list-style-type: none"> ● Provide high quality services, community facility and social infrastructure that are accessible to all. ● Promote improvements to health and wellbeing. ● Promote healthier lifestyles. ● Minimise noise pollution. ● Reduce crime including the fear of crime. ● Reduce anti-social behaviour. ● Ensure that there are appropriate facilities for the disabled and elderly. ● Deliver safe and secure networks of green infrastructure and open space. ● Improve the lives of people with mental illnesses or disabilities. 	<p>NPPF; West Midlands Health & Well-Being Strategy; Thrive West Midlands – An Action Plan to drive better mental health and wellbeing in the West Midlands; A Single Sustainable Community Strategy for Worcestershire; Playing Pitch Strategy; Statement of Community Involvement 2016; Neighbourhood Plans.</p>	<p>The SA Framework should include objectives and/or guide questions relating to:</p> <ul style="list-style-type: none"> ● Addressing deprivation and promoting equality and inclusion; ● The provision of high quality community facilities and services that are inclusive to all; ● The promotion of health and wellbeing; ● The delivery of health facilities and services; ● The provision of open space and recreational facilities; and ● Reducing crime, the fear of crime and anti-social behaviour.
Housing		
<ul style="list-style-type: none"> ● Enable housing growth and deliver a mix of high quality housing to meet local needs. ● Increase the provision of affordable housing. ● Make appropriate provision for Gypsies, Travellers and travelling showpeople. 	<p>NPPF; Planning Policy for Traveller Sites; GBSLEP Joint Strategic Housing Study (2014); Worcestershire Gypsy and Traveller Accommodation Assessment 2014; Worcestershire Housing Partnership Plan 2017; Interim Worcestershire Homeless Strategy Action Plan 2017-2018; Supplementary Planning Guidance; Draft High Quality Design Supplementary Planning Document; Bromsgrove District Plan 2011-2030; 5 Year Housing Land Supply in Bromsgrove District; Housing Land Availability Report (2014).</p>	<p>The SA Framework should include objectives and/or guide questions relating to:</p> <ul style="list-style-type: none"> ● The provision of high quality housing; ● The provision of a mix of housing types to meet local needs; ● Increase the provision of affordable housing; and ● The provision of new plots for Gypsies, Travellers and travelling showpeople.
Economic Activity and Education		
<ul style="list-style-type: none"> ● Create local employment opportunities. ● Ensure that there is an adequate supply of employment land to meet local needs. ● Continue to achieve economic growth. 	<p>NPPF; Strategic Economic Plan 2016-2030; West Midlands Visitor Economy Strategy; Connecting to Success – West Midlands Economic Strategy; An Economic Strategy for</p>	<p>The SA Framework should include objectives and/or guide questions relating to:</p> <ul style="list-style-type: none"> ● The enhancement of education and skills;

Key Objectives and Policy Messages	Key Source(s)	Implications for the SA Framework
<ul style="list-style-type: none"> ● Encourage more high skill jobs to the area. ● Increase the number of tourists to the area. ● Increase the level of higher education attainment. ● Increase the productivity of the Districts workforce. ● Continue to decrease unemployment. ● Ensuring the benefits of economic growth are shared by all. 	<p>Worcestershire 2010-2020; World Class Worcestershire – Our Strategic Economic Plan; Shaping Worcestershire's Future 2017-2022; Employment Land Availability Report; Bromsgrove District Plan 2011-2030; Longbridge Area Action Plan.</p>	<ul style="list-style-type: none"> ● Delivery of employment land that supports economic diversification and the creation of high quality, local jobs; ● The promotion of tourism and the visitor economy; and ● Reducing unemployment.
Transport and Accessibility		
<ul style="list-style-type: none"> ● Encourage sustainable transport and reduce the need to travel. ● Reduce traffic and congestion. ● Improve public transport provision. ● Encourage walking and cycling. ● Enhance accessibility to key community facilities, services and jobs for all. ● Reduce the degree by which transport contributes towards climate change. ● Encourage the use of green infrastructure. 	<p>NPPF; Air Quality Plan for Nitrogen Dioxide 2017; Home to School Travel and Transport Guidance 2014; Worcestershire Access and Informal Recreation Strategy 2009-2019; Green Infrastructure Strategy 2013-2018; Worcestershire Local Transport Plan (LTP) 2018-2030; Draft High Quality Design SPD.</p>	<p>The SA Framework should include objectives and/or guide questions relating to:</p> <ul style="list-style-type: none"> ● Reducing the need to travel, particularly by car; ● The promotion of sustainable forms of transport; ● Encouraging walking and cycling; ● Maintaining and enhancing accessibility to key facilities, services and jobs; ● Reducing congestion and enhancing road safety; and ● Investment in transportation infrastructure to meet future needs.

3. Baseline Analysis

3.1 Introduction

3.1.1 An essential part of the SA scoping process is the identification of the current baseline conditions and their likely evolution. It is only with a knowledge of existing conditions, and a consideration of their likely evolution, can the effects of the District Plan be identified and appraised and its subsequent success or otherwise be monitored. The SEA Directive also requires that the evolution of the baseline conditions of the Plan area (that would take place without the plan or programme) is identified, described and taken into account. This is also useful in determining the key issues for each topic that should be taken forward in the SA, through the SA Objectives and guide questions.

3.1.2 This section identifies and characterises current socio-economic and environmental baseline conditions for Bromsgrove, along with how these are likely to change in the future. The analysis is presented for the following topic areas:

- Soils and Land Use, Water Resources and Water Quality;
- Air Quality, Waste, Pollution and Energy, Flood Risk and Climate Change;
- Biodiversity, Geodiversity and Green Infrastructure;
- Landscape, Townscape and the Historic Environment;
- Healthy and Inclusive Communities;
- Housing;
- Economic Activity and Education; and
- Transport and Accessibility.

3.1.3 Additionally, this section also presents a high level overview of Bromsgrove District.

3.1.4 To inform the analysis, data has been drawn from a variety of sources, including: the Office of National Statistics; Nomis; the evidence base for the adopted Bromsgrove District Plan, any emerging evidence base work for the new District Plan, Environment Agency; Historic England; Department for Environment, Food and Rural Affairs (Defra) and the Department for Business, Energy and Industrial Strategy (BEIS).

3.1.5 The key sustainability issues arising from the review of baseline conditions are summarised at the end of each topic.

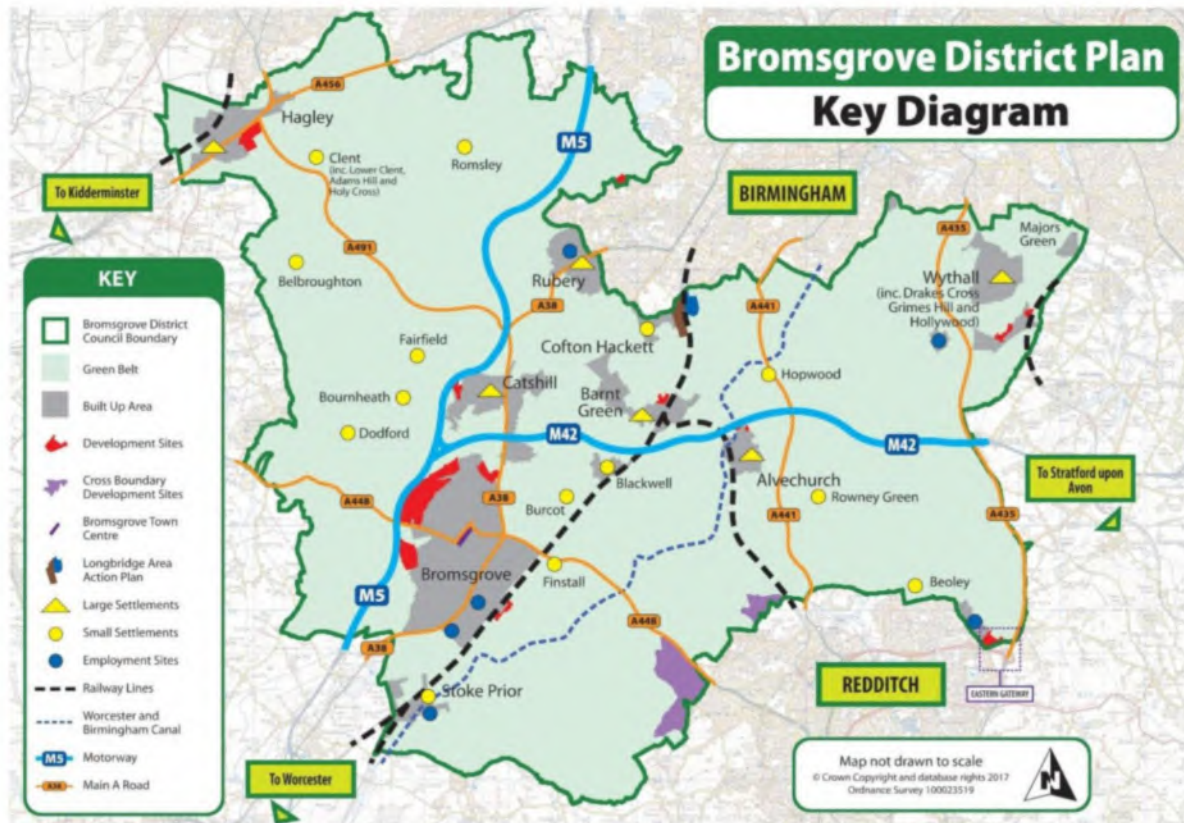
3.2 Bromsgrove District: An Overview

3.2.1 Bromsgrove District is situated in north Worcestershire and covers approximately 21,714 hectares. Although the town is located only 22km (14 miles) from the centre of Birmingham, the District is predominantly rural with approximately 90% of the land designated as Green Belt.

3.2.2 The area is well served by motorways, with the M5 running north/south (J4, J4a and J5) and the M42 east/west (J1, J2 and J3). The M5 and M42 connect with the M6 to the north of Birmingham and M40 to the east. The District also benefits from train and bus connections into Birmingham City Centre and the wider region.

- 3.2.3 The main centre of population in Bromsgrove District is Bromsgrove Town with other larger centres being Alvechurch, Barnt Green, Catshill, Hagley, Rubery, and Wythall. A series of smaller rural villages and hamlets are spread throughout the District. Development pressures are high due to the District's proximity to the Birmingham conurbation and the motorway and railway connections.
- 3.2.4 The District boundary, main towns and transport connections are shown on the figure below.

Figure 3.1 Bromsgrove District Plan Key Diagram



Source: Bromsgrove District Plan (Adopted January 2017)

3.3 Soils and Land Use, Water Resources and Water Quality

Soils and Land Use

- 3.3.1 Government policy set out in the NPPF encourages the effective use of land by re-using land that has been previously developed. The latest Authority's Monitoring Report¹⁰ highlights that the number of dwellings developed on previously developed land (brownfield land) per annum steadily decreased over the previous five-year monitoring period (see **Table 3.1** below). Although 73% of residential development took place on brownfield land in 2009/10; in 2015/16 this was 31%. This reflects the effects of two factors: that many of the available brownfield sites in the District have now been redeveloped; and the Government's redefinition of residential gardens as greenfield land

¹⁰ Bromsgrove District Council (2014) Authority Monitoring Report. Available via: <http://www.bromsgrove.gov.uk/media/1468259/amr-2014-low-res.pdf> [accessed February 2018]

in 2011. The District Council's Brownfield Land Register¹¹ shows that there are 17.39 hectares of previously developed land considered to be suitable and achievable for development of 468 dwellings. Although there are brownfield sites that could deliver housing, there are a limited number of dwellings that could be expected to be delivered on previously developed land.

Table 3.1 Percentage of Dwellings Completed on Brownfield/Greenfield Land

Year	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16
Development on Greenfield (%)	26.83	28.26	62.45	52.38	60.32	68.64	68.77
Development on Brownfield (%)	73.17	71.74	37.55	47.62	39.68	31.36	31.23

Source:

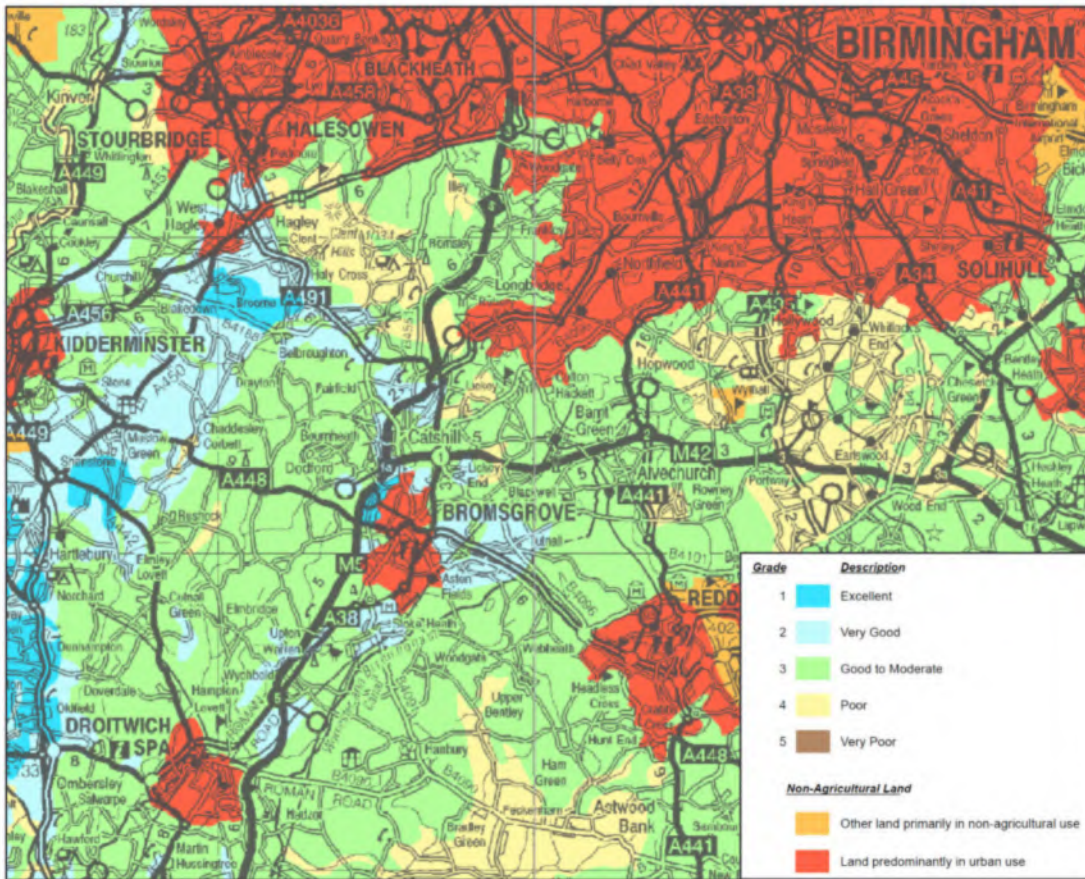
Authority's Monitoring Report (2014) and BDC updates

- 3.3.2 Contaminated land can be classed in many different ways and at different levels dependent upon the types and intensity of the contaminant and also the intended use of the land. Although Bromsgrove does not contain large areas of contaminated land there are pockets of contaminated land related to previous industrial uses in the urban areas. However, there are no entries on the public register of contaminated land¹² within Bromsgrove. Neighbouring Redditch includes 19 entries.
- 3.3.3 The District is pre-dominantly rural. The quality of the land in the rural areas is of particular importance, not only to the biodiversity of the District but also the rural economy. Agriculture is a major land use that relies on the quality of agricultural land. The District contains large areas of the best and most versatile land (Agricultural Land Classification (ALC) Grades 1 to 3a). However, there are also a number of areas classified as poor (ALC Grade 4) as shown on **Figure 3.2** below.

¹¹ It is now a statutory requirement for Local Planning Authorities to produce a register of all previously developed land (brownfield sites) which are suitable, available and achievable for residential development in the area. Bromsgrove District Council Brownfield Land Register (2017) Available via: <http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/brownfield-land-register.aspx> [accessed February 2018]

¹² Worcestershire County Council maintained Public Register of Contaminated Land <http://www.worcsregservices.gov.uk/pollution/contaminated-land/public-register-of-contaminated-land.aspx> [accessed February 2018]

Figure 3.2 Agricultural Land Classifications in Bromsgrove and Surrounding Area



Water Resources

- 3.3.4 Severn Trent Water provides public water supply to Bromsgrove District (with the exception of a very small section of the northwest of the District which is provided by South Staffordshire Water). Water supply is mainly from borehole sources associated with the underlying Triassic Sherwood Sandstone Aquifer. Bromsgrove also lies within the Strategic Grid water resource zone which increases the security of supply to the District. Water in the Strategic Grid water resource zone is supplied from a combination of groundwaters and surface waters (including rivers and reservoirs).
- 3.3.5 The Worcestershire Middle Severn Abstraction Licensing Strategy (2013)¹³, which includes the north and west of the District, identifies that surface water is available for licensing in the catchment area (but there is restricted water available for abstraction in the District itself). Groundwater is available in those parts of the District within this catchment. The Warwickshire Avon Abstraction Licensing Strategy (2013)¹⁴, which covers the east of the District, identifies that there is surface water available although groundwater is only partially available for licensing in the part of the catchment covering the District.
- 3.3.6 The growth in local population is expected to increase demand on water resources, which has the potential to affect water resource availability. The Severn Trent Water, Water Resources

¹³ Environment Agency (2013) *Worcestershire Middle Severn Abstraction Licensing Strategy - A licensing strategy to manage water resources sustainably*

¹⁴ Environment Agency (2013) *Warwickshire Avon Abstraction Licensing Strategy- A licensing strategy to manage water resources sustainably*

Management Plan (WRMP) (2014)¹⁵ highlights that the Strategic Grid resource zone faces some significant supply shortfalls in the long term as a result of the need to reduce abstraction from unsustainable sources including in particular the River Wye and Elan Way reservoir and the potential impacts of climate change. In consequence, new investment is required to provide alternative water supplies.

- 3.3.7 Severn Trent Water has now published its WRMP19¹⁶ and this corroborates the findings from 2014, although the supply/demand balance issue appears to be more immediate, although there are proposed measures to address this.
- 3.3.8 The Outline Water Cycle Study (2012)¹⁷ prepared in support of the development of the existing District Plan concluded that the levels and distribution of development proposed at that time would require upgrades at a number of wastewater treatment works although there were no constraints to preventing treatment capacity extension.

Water Quality

- 3.3.9 There are three major watercourses within Bromsgrove District. These are the River Salwarpe and its tributaries (Battlefield Brook, Spadesbourne Brook and Sugar Brook), Hoo Brook and Gallows Brook. The upper reaches of the rivers Arrow and Stour also have their source in Bromsgrove District. There are also a number of smaller water courses including tributaries of the River Cole, Blacksoils Brook and Hen Brook. The Worcester and Birmingham Canal also traverses the District from the north east to the south west.
- 3.3.10 The District falls within three catchments: the Severn Middle Worcestershire in the north and west which covers the majority of the District; the Tame, Anker and Mease in the far north east, and the Avon Warwickshire in the east. These catchments are covered by the Severn River Basin District River Basin Management Plan (RBMP) (2015). The Severn River Basin District RBMP (2015)¹⁸ reports that in 2015, 20% of surface water bodies in the river basin district had 'Good' or 'Better' ecological status/potential whilst 95% of water bodies had good chemical status. As at 2015, 64% of groundwaters were at a 'Good' chemical status. The RBMP notes that the measures implemented since the 2009 report have resulted in improvements to the quality of the water environment. However, the RBMP identifies the following issues as affecting water quality in the river basin district:
- Physical modifications - affecting 27% of water bodies in this river basin district;
 - Pollution from waste water – affecting 29% of water bodies in this river basin district;
 - Pollution from towns, cities and transport - affecting 12% of water bodies in this river basin district;
 - Changes to the natural flow and level of water - affecting 7% of water bodies in this river basin district;

¹⁵ Available from <http://www.severntrent.com/future/future-plans-and-strategy/water-resources-management-plan> [Accessed February 2018]

¹⁶ Available from <https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/> [Accessed March 2018]

¹⁷ MWH UK Limited for Redditch Borough Council and Bromsgrove District Council (2012)

<http://www.bromsgrove.gov.uk/media/1571589/cd-1011-water-cycle-study-may-2012.pdf> [Accessed February 2018]

¹⁸ Environment Agency and Natural Resources Wales (2015) *Severn River Basin District River Basin Management Plan*.

- Negative effects of invasive non-native species - affecting <1% of water bodies in this river basin district;
- Pollution from rural areas - affecting 40% of water bodies in this river basin district; and
- Pollution from abandoned mines - affecting 2% of water bodies in this river basin district.

3.3.11

The Environment Agency has completed an exercise to refresh the data related to smaller operational catchments¹⁹. The majority of the District falls within the Salwarpe River Operational Catchment (to the west) and Avon: Urban Rivers and Lakes and Avon: Midlands West (both to the east). In the Salwarpe Catchment, ecological status was 'moderate' in 3 out of 7 waterbodies with 4 achieving 'poor' status. Chemical status was 'good' in all 7 of the waterbodies. In the Avon: Urban Rivers and Lakes Catchment, ecological status was 'moderate' in 14 out of 21 waterbodies with 7 achieving poor status. Chemical status was classified as 'good' in 20 out of 21 waterbodies. For Avon: Midlands West, ecological status was 'moderate' or 'Good' in 15 out of 22 waterbodies with 7 achieving poor status. Chemical status was classified as 'good' in all 22 waterbodies.

3.3.12

The main sectors affecting the status of waterbodies in the operation catchments have been cited as agriculture and land management (due to changes in natural flows/levels of water and pollution from rural areas), industry, urban development and transport, and water industry operations (principally pollution from wastewater).

3.3.13

Water supply in the District is mainly from borehole sources. These wells abstract water from Triassic Sherwood Sandstones which are classed as principal aquifers of generally high vulnerability to surface contamination. This vulnerability classification is based upon the presence and nature of overlying soil; the presence and nature of drift (deposits at the surface); the nature of the geological strata (solid rock) and the depth of the unsaturated zone (i.e. depth to the water table).

3.3.14

The areas underlain by the Permo-Triassic Sandstone also fall within Source Protection Zones (SPZ). SPZs have been modelled to protect specific sensitive locations such as springs, wells and boreholes used for public water suppl. The abstraction of groundwater from a borehole modifies the natural groundwater flow in the aquifer. Generally, the closer a polluting activity or release is to a groundwater source the greater the risk of pollution. All groundwater abstraction sources may be liable to contamination and need to be protected. As the more densely occupied/developed areas such as Bromsgrove town, Catshill and Hagley are highly sensitive in terms of protection of groundwater, it is essential that all appropriate measures are taken to ensure that the underlying aquifers are protected.

3.3.15

With respect to groundwater vulnerability, the Environment Agency has recently published guidance²⁰ on groundwater protection. This includes a number of overarching groundwater protection principles that will apply to the activities described in later position statements. These principles include:

- Risk based approach to regulate activities which may impact on ground water resources;
- Precautionary principle - that development must be appropriate to the sensitivity of the site;
- Risk based approach – consider groundwater protection hierarchy in strategic plans when proposing new development or activities;

¹⁹ See <http://environment.data.gov.uk/catchment-planning> [Accessed February 2018].

²⁰ 'Approach to Groundwater Protection' (February 2018). Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Envirnment-Agency-approach-to-groundwater-protection.pdf [Accessed 20/04/18]

- Responsibility for assessments - that developers and operators to assess the area of influence of their activities;
- Supply of adequate information;
- Compliance with guidance;
- Enforcement;
- Building and decommissioning of structures; and
- Restoration of groundwater.

Likely Evolution of the Baseline without the District Plan

Without an up-to-date District Plan, national planning policy set out in the NPPF would apply and may help to ensure that new development is focused on brownfield land. Without clear up-to-date local planning policy relating to the location of future development and the provision of sites to meet local needs, the Council would have less control over where development takes place. This could increase the likelihood of development of greenfield sites and which may, in-turn, result in the loss of the District's best and most versatile agricultural land.

The projected increase in the District's population will result in increased pressure on water resources which could affect water availability and quality. Measures contained in the Severn Trent Water Resources Management Plan would be expected to help ensure that future demands in this regard are met although opportunities may be lost to enhance the water efficiency of new development without an up-to-date local policy-based approach.

Water quality in the Severn River Basin District, meanwhile, is expected to improve with 27% of surface waters predicted to be at good ecological status/potential or better by 2021 and 69% of groundwaters predicted to be at good chemical status (based on the Severn River Basin District RBMP). It is expected that these trends would continue without the new District Plan.

Key Sustainability Issues

- The need to identify additional previously developed land that could be redeveloped and to encourage development on previously developed (brownfield) land;
- The need to protect the best and most versatile agricultural land in the District;
- The need to protect and enhance the quality of the District's water sources;
- The need to promote the efficient use of water resources; and
- The need to ensure the timely provision of new water services infrastructure to meet demand arising from new development.

3.4 Air Quality, Waste, Pollution and Energy, Flood Risk and Climate Change

Air Quality

Legislative frameworks and guidance in relation to air quality have been established at both the European and UK level. Policies aim to reduce exposure to specific pollutants by reducing emissions and setting targets for air quality. Policies are driven by the aims of the EU Air Quality

Directive (2008/50/EC)²¹. The key objective is to help minimise the negative impacts on human health and the environment. The Directive sets guidance for member states for the effective implementation of air quality targets.

- 3.4.2 The UK's National Air Quality Strategy²² sets health based standards for eight key pollutants and objectives for achieving them. This is to ensure a level of ambient air quality in public places that is safe for human health and quality of life. It also recognises that specific action at the local level may be needed depending on the scale and nature of the air quality problem.
- 3.4.3 Local authorities have a duty to undertake a full review and assessment of air quality in accordance with the National Air Quality Strategy. Where there is a likelihood of a national air quality objective being exceeded, the council must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives.
- 3.4.4 In 2017, Defra published an Air Quality Plan²³ for Nitrogen Dioxide (NO₂). This plan sets out how the Government will improve air quality in the UK by reducing nitrogen dioxide emissions in towns and cities. The air quality plans set out targeted local, regional and national measures across 37 zone plans (areas which have identified air quality issues with nitrogen dioxide), a UK overview document and a national list of measures. Measures relate to freight, rail, sustainable travel, low emission vehicles and cleaner transport fuels, among others.
- 3.4.5 Many of the perceived big polluters of previous decades have all but disappeared from the District including typically heavy engineering and manufacturing industries such as the Garringtons/UEF forging works. When considered alongside the massive rise in the use of motor vehicles, newer forms of pollution have become more prevalent. Bromsgrove has not escaped this shift in pollution, with 2 motorways and a number of high capacity trunk roads crossing the District.
- 3.4.6 An Air Quality Management Area (AQMA) was declared in 2001 for Lickey End, due to road traffic emissions (Nitrogen Dioxide [NO₂]) from the M42. Following declaration of the AQMA, the Council in partnership with Worcestershire County Council (WCC) as the Local Transport Authority and the Highways Agency (HA) as the body responsible for the motorways network, were required to develop an Action Plan. The purpose of the Plan was to deliver viable measures that will work towards achieving the air quality objectives within the AQMA, and to encourage active participation in its achievement through consulting the local community and raising awareness of air pollution issues.
- 3.4.7 In February 2010 and June 2011, arising from the findings of the local air quality detailed assessment work, three further Air Quality Management Areas (AQMA) were declared for Redditch Road Stoke Heath, part of Kidderminster Road Hagley and Worcester Road Bromsgrove, due to road traffic emissions (Nitrogen Dioxide [NO₂]).
- 3.4.8 In order to meet government targets and to maintain the high standards of the air quality programme, a 4 year partnership arrangement was entered into with consultants. Some 30+ NO₂

²¹European Commission (2008) Directive 2008/50/EC on ambient air quality and cleaner air for Europe. Available online:

<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32008L0050>

²² Department for Environment, Food and Rural Affairs in partnership with the Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland (2007) *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Volume 1*. Available online:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

²³ Defra (2017) Air Quality Plan for Nitrogen Dioxide (NO₂) in UK. Available online at <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017> [Accessed 20/02/18]

diffusion tubes, including those required for the national survey, were located at various sites throughout the District.

3.4.9

The 2016 Annual Air Quality Annual Status Report²⁴ (ASR) was produced by Worcestershire Regulatory Services and Bromsgrove District Council. This provided a summary of the status of each of the four AQMAs in 2015:

- Lickey End – Concentrations of NO₂ between 2011 and 2015 suggested that monitoring and review should continue and therefore that the Lickey End AQMA should remain in place at this time;
- Kidderminster Road, Hagley – No exceedances of the annual mean objective were recorded within the Kidderminster Road, Hagley AQMA in 2015 and that no monitoring points in this location were within 5% of the annual mean average objective for NO₂. Following review of 2016 data and further study, the Council is considering whether the AQMA can be revoked;
- Redditch Road, Stoke Heath - No exceedances of the annual mean objective were recorded within the Redditch Road AQMA in 2015 and that no monitoring points in this location were within 5% of the annual mean average objective for NO₂. Following a review of 2016 data the Council is considering undertaking a detailed study of the AQMA in order to determine whether the AQMA can be revoked; and
- Worcester Road, Bromsgrove – Two exceedances of the annual mean objective for NO₂ were recorded in the Worcester Road AQMA in 2015. Concentrations of NO₂ between 2011 and 2015 suggest monitoring should continue and that the AQMA should remain in place in this location.

3.4.10

For other areas in the District where monitoring is undertaken, there were no exceedances of the annual mean objective for NO₂, or any concentrations within 5% of that objective in 2015.

3.4.11

Figure 3.3 below shows the boundaries of each of the four AQMAs in the District.

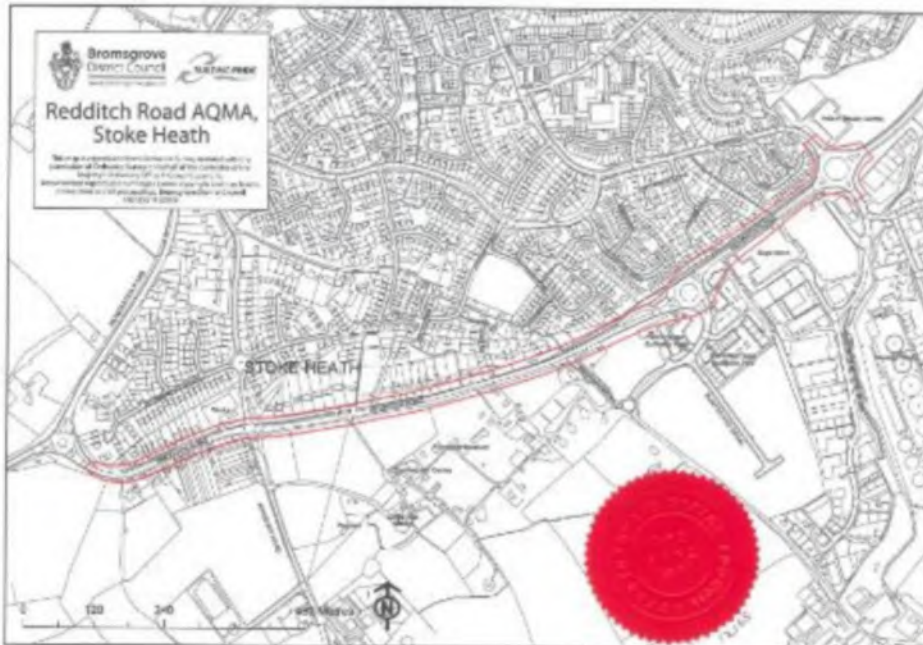
Figure 3.3 Air Quality Monitoring Areas in Bromsgrove

Lickey End AQMA

²⁴ Worcestershire Regulatory Services and Bromsgrove District Council 2016 Air Quality Annual Status Report Available at <http://www.worcsregservices.gov.uk/media/2609437/Bromsgrove-DC-ASR-FINAL.pdf> [Accessed 19.02.18]



Redditch Road, AQMA, Stoke Heath



Kidderminster Road AQMA, Hagley



Worcestershire Road AQMA, Bromsgrove



Waste, Pollution and Energy

Waste

- 3.4.12 In 2016/17, some 38,838 tonnes of waste were collected from households in Bromsgrove District, which equates to about 1,173kg per household. Of this, 44.4% was recycled or composted which represents a 2.9% increase in recycling and composting when compared to the 2011/12 combined recycling and composting rate of 41.5%.
- 3.4.13 The garden waste collection service was introduced in 2003 and became a chargeable service in 2009. By 2016/17, 45% of all households were signed up to this collection service and 7,613 tonnes of garden waste was collected. This equates to 408.42kg per household.
- 3.4.14 The vast majority of residual waste is sent to EnviRecover (a 200,000 tonne per year 'Energy from Waste' facility in Hartlebury which is run by Severn Waste Services). This has greatly reduced

reliance on landfill for the District, which deals with waste disposal in a more sustainable manner and feeds in excess of 16MW of energy into the National Grid.

Table 3.2 Waste Collection in Bromsgrove District

Year	Total Household Waste Collected (Tonnes)	Household waste sent for dry recycling (Tonnes)	Household waste sent for composting or anaerobic digestion (Tonnes)	Household waste collection (kilograms per head)
2011/12	35,989	8,986 (24.97%)	5,941 (16.51%)	385
2016/17	38,838	9,649 (24.84%)	7,614 (19.60%)	401

Source: Waste Data Flow²⁵

Pollution

- 3.4.15 Noise pollution associated with motorways is an issue for the District, especially given that there is a significant amount of residential areas surrounding the motorways. Noise from major A roads is also an issue for the adjacent settlements. Road based noise can be improved using better road treatments, barriers and also by slowing traffic. The responsibility for trunk road noise control measures rests with the Highways Agency.
- 3.4.16 The Environmental Protection Act 1990²⁶ (principal legislation), provides statutory noise nuisance controls, in particular, the power to serve notices for the prevention of an occurrence / recurrence, and prohibition of statutory nuisances. In respect of noise problems in domestic premises new construction materials can play an important role in reducing conflicts over noise.
- 3.4.17 In 1995 the Council for the Protection of Rural England (now the Campaign to Protect Rural England CPRE) and the then Countryside Commission first published a national set of 'Tranquil Area' maps, indicating areas that were not affected by noise from man-made influences such major roads, airports, urban areas etc. Since then, more up-to date data has been collected and a new set of maps were published in "Developing an Intrusion Map of England²⁷" (2007). The report shows that in Worcestershire, the area disturbed by noise and visual intrusion has increased significantly from 27.40% in early 1960s, to 51.02% in early 1990s and 60.23% in 2007. The report also mentions that B roads were omitted from the 2007 analysis, and therefore the 2007 figures (the most recent available) present an 'optimistic scenario' for the District.
- 3.4.18 More recent information²⁸ suggests that road traffic noise continues to be a problem in the District and this is particularly concentrated around the motorways. As shown on **Figure 3.4** below Bromsgrove Town Centre and parts of the surrounding area suffer from noise levels above 55dB and this rises to 70dB and above the closer you get to the motorway. Noise levels at night are reduced as a consequence of reduced traffic flows on the Motorways.

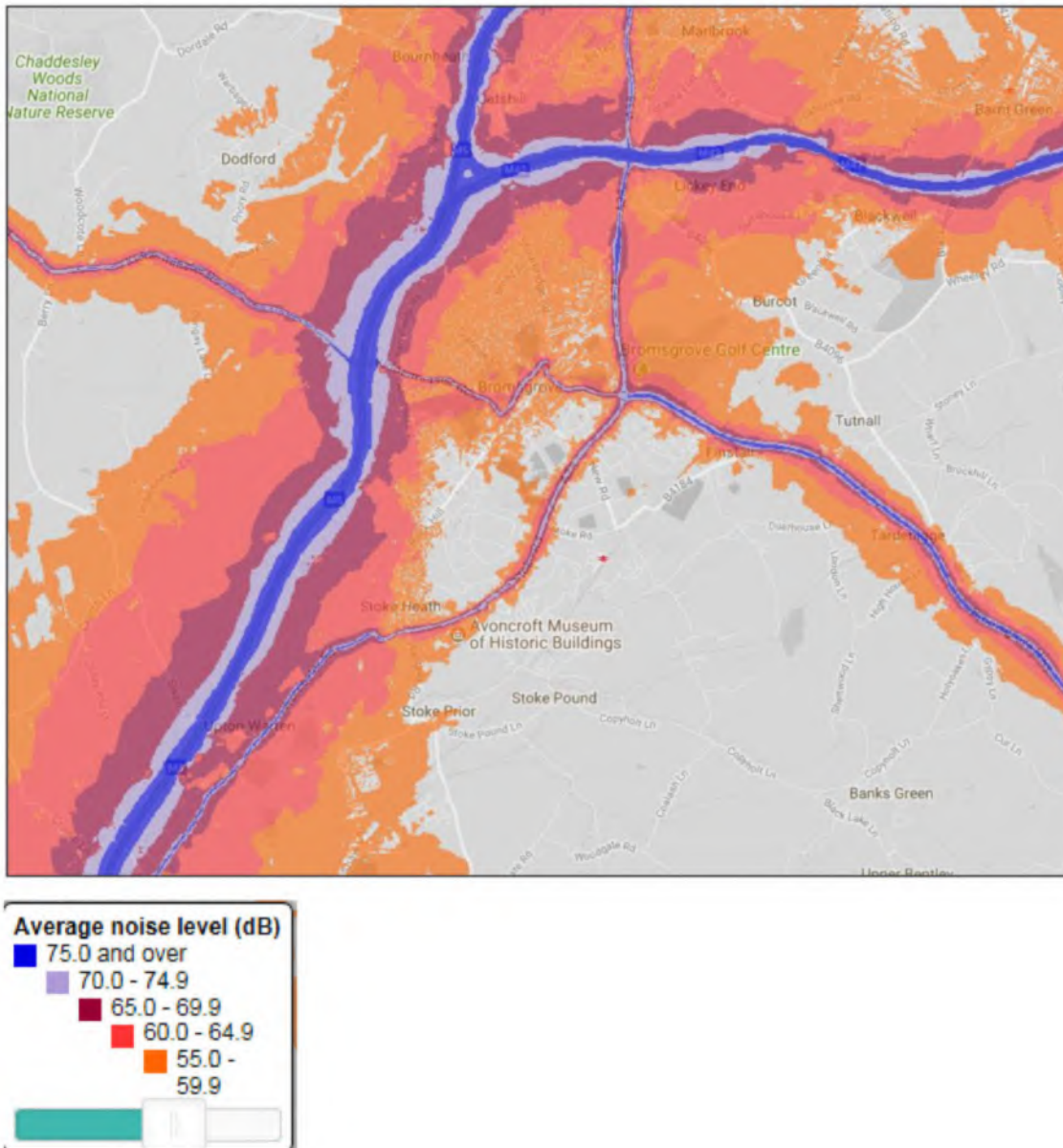
²⁵ Waste Data Flow <http://www.wastedataflow.org/> [Accessed February 2018]

²⁶ Available at <http://www.legislation.gov.uk/ukpga/1990/43/contents> [Accessed February 2018]

²⁷ Available at <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1790-developing-an-intrusion-map-of-england> [Accessed February 2018]

²⁸ <http://www.extrium.co.uk/noiseviewer.html> [Accessed March 2018]

Figure 3.4 Noise Levels in the Vicinity of Bromsgrove Town



Source: <http://www.extrium.co.uk/noiseviewer.html>

- 3.4.19 Noise from the rail traffic is much less of an issue and this is confined to areas in close proximity to the railway lines.
- 3.4.20 A potential separate cause of pollution in the District is surface run off. This defined as “*non-point source pollution*” affecting aquatic wildlife as pollutants in surface water find their way through storm drains into water courses and by infiltration into groundwater. As highlighted in paragraph 3.3.10 above the majority of waterbodies in the District are at good or moderate status with only 4 in the Salwarpe River Operational Catchment (to the west) and 7 out of 21 in the Avon: Urban Rivers and 7 out of 22 Avon: Midlands West (both to the east) classed as poor ecological status. The chemical status of the majority of the waterbodies was good which suggests that overall pollution from surface water run-off is not a significance problem. However, one measure implemented to alleviate problems that do occur from surface water run-off is the use of Sustainable Drainage Systems (SuDS). Closed waste sites can also affect both groundwater and air quality. Level of abstraction and the consequential adverse effect on biodiversity and long term water resources is of concern.

Energy

- 3.4.21 The latest information on the use of energy in Bromsgrove shows that between 2010 and 2015, the domestic consumption of gas and electricity reduced (see **Table 3.3** below). Gas consumption reduced from 617.8 GWh in 2010 to 557.8 GWh in 2015 (10% reduction), whilst the consumption of electricity decreased from 179.5 GWh in 2010 to 163.2 GWh in 2015 (9% reduction). These reductions are in line with that experienced at a regional level. For the West Midlands as a whole, the domestic annual consumption of gas reduced from 31161.4 GWh to 27,847.2 GWh (a 10% reduction) and electricity reduced from 9,912.9 GWh to 8,929.9 GWh (also a 10% reduction).

Table 3.3 Domestic Energy Consumption in the District

Year	Gas (GWh)	Electricity (GWh)
2010	617.8	179.5
2011	587.6	177.2
2012	587.9	173.9
2013	574.6	172.7
2014	560.6	174.5
2015	557.8	163.2

Source: Department for Business, Energy and Industrial Strategy (2017) *Sub-national total final energy consumption in the United Kingdom*.

- 3.4.22 Levels of commercial and industrial energy consumption are shown in **Table 3.4** below for the period 2010 to 2015. As with domestic consumption, trends indicate that the District's annual commercial and industrial consumption of gas reduced within the period (by around 13%). However, the use of electricity fluctuated with more consumed in 2015 than in 2010 (an increase of around 7%). This trend is reflected in the total consumption for the West Midlands as a whole although in percentage terms Bromsgrove saw a larger reduction. For the West Midlands as a whole, the annual commercial and industrial consumption of gas reduced from 16,743.4 GWh in 2010 to 16,088.1 GWh in 2015 (a 5% reduction). However, electricity consumption increased slightly from 15,004.9 GWh to 15,244.0 GWh (an increase in 1.5%).

Table 3.4 Commercial and Industrial Energy Consumption in the District

Year	Gas (GWh)	Electricity (GWh)
2010	133.5	149.3
2011	126.5	145.0
2012	124.5	145.7
2013	133.8	147.3
2014	124.7	178.2
2015	116.9	160.4

Source: Department for Business, Energy and Industrial Strategy (2017) *Sub-national total final energy consumption in the United Kingdom*.

- 3.4.23 As at 2016, the West Midlands region generated 1688.8 GWh of electricity from renewable sources compared to an average of 6,067.1 GWh across all of the English regions (Yorkshire and the Humber - 19,315.3, East of England - 8,156.9 and the South East - 7,450.2 were all significantly higher than the other regions). This is a 197% increase from 857.7 GWh recorded in 2011. This percentage increase is also lower than the English regional average which saw an increase of 305% on the 1982.2 GWh recorded in 2011²⁹.
- 3.4.24 Although much has been published regarding the capacity for renewable energy production within Bromsgrove itself, Worcestershire and the West Midlands as a whole, there is little up-to-date evidence. However, it has been identified that there is capacity in Bromsgrove for large scale wind power, and more limited opportunities for biomass plants and hydropower³⁰. Solar power is also recognised as a potentially significant renewable energy source within the District as it recognised as having good solar irradiance, with good opportunities for solar thermal/power generation.³¹ Worcestershire County Council's Renewable Energy Strategy (2015)³² highlights a number of drivers for delivering more renewable energy generation in the County:
- A need for more energy from more sources;
 - Ever-increasing heating and lighting costs;
 - Investment opportunities offered by renewables;
 - Greater community awareness of energy options; and
 - A need to protect our environment.

Flood Risk

- 3.4.25 The NPPF seeks to ensure that flood risk is taken into account at the plan making stage in order to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk.
- 3.4.26 The flood risk in the District is concentrated in a few places but the risk of major flooding is minimal. No major rivers flow through the District. However, it does contain a number of small watercourses that can, in adverse weather conditions, cause a small amount of localised flooding and so there is risks of flooding from these smaller watercourses (although these do not have an associated flood extent based on the EA flood maps). The majority of flooding incidences in the District, especially in urban areas is caused by water run-off rather than overflowing watercourses.

²⁹ Department for Business, Energy and Industrial Strategy (2017) Available via: <https://www.gov.uk/government/statistics/regional-renewable-statistics> [accessed February 2018]

³⁰ See Bromsgrove District and Redditch Borough Council's (201 updated 2011) Climate Change Strategy & Action Plan. Available via: <http://www.bromsgrove.gov.uk/media/751947/0111-BA0765-Climate-Change-Strategy-REVISED.pdf> [accessed February 2018]; IT Power (2008) Renewable Energy Study for Worcestershire County Council. Available via: <http://www.swdevelopmentplan.org/wp-content/uploads/2014/11/IT-Power-Renewable-Final-Report-PDF-December.pdf> [accessed February 2018]; SQW and Maslen environmental (2011) Renewable Energy Capacity Study for the West Midlands. Available via: http://www.swdevelopmentplan.org/wp-content/uploads/2013/05/Renewable_Energy_Capacity_Study.pdf [accessed February 2018]

³¹ Worcestershire County Council (2009) Planning for Renewable Energy in Worcestershire: Technical Paper. Available via: http://www.worcestershire.gov.uk/downloads/file/5117/planning_for_renewable_energy_in_worcestershire [accessed February 2018]

³² Worcestershire County Council (2107) Renewable Energy Strategy. Available via: http://www.worcestershire.gov.uk/downloads/file/6548/wcc_renewable_energy_strategy [accessed February 2018]

3.4.27 MWH produced a Water Cycle Study³³ for Bromsgrove in May 2012 and this includes a section on flood risk. This considered the following key questions:

1. Whether development can be accommodated without increased flood risk?
2. Was there was sufficient land at low risk of flooding for the selected proposed development sites in the District?
3. Would rainwater be adequately managed to prevent surface water flooding in the selected proposed development sites?
4. Would increased discharge from Waste Water Treatment Works increase flood risk?

3.4.28 The summary of the assessment against the above questions was as follows:

- Provided the proposed development type is suitable for a flood zone, development can be accommodated in the District without increased flood risk;
- There is sufficient land available to accommodate the assessed proposed development sites;
- Rainwater runoff should be managed through the use of SuDs; and
- Provided that appropriate measures are put in place to control surface water run-off from each of the assessed proposed development sites, there should be no increase in flood risk at the STWs.

3.4.29 MWH also completed a level 2 strategic flood risk assessment³⁴ (SFRA) for the Council in June 2012. This was undertaken in accordance with NPPF requirements and was produced to direct development away from areas at highest risk of flooding. As part of this assessment work hydraulic modelling was undertaken of nine development sites in Bromsgrove to determine fluvial flood risk. All but one of the sites were determined to have only minor flooding issues. For the one site with more significant flood risk issues it was recommended that development was directed to areas at lower risk of flooding within the site.

3.4.30 To mitigate the risks of surface water flooding, SuDS techniques were recommended to be used wherever possible and that a surface water management plan³⁵ was prepared as a matter of urgency. The SFRA also considered sewer flooding but noted that sewer flooding is the responsibility of Severn Trent Water. There were several sites in Bromsgrove identified as requiring further investigation due to risks of sewer flooding.

3.4.31 The SFRA made a number of recommendations for Bromsgrove:

- Sequential approach required to determine suitability of land for development in areas at risk from flooding;
- Opportunities should be sought through all stages of the planning process for improving the river environment, including exploring opportunities for restoring watercourses, de-culverting and ensuring an appropriate buffer zone is provided between watercourse and any development;

³³ MWH UK Limited for Redditch Borough Council and Bromsgrove District Council (2012). Available online at: <http://www.bromsgrove.gov.uk/media/1571589/cd-1011-water-cycle-study-may-2012.pdf> [Accessed February 2018].

³⁴ Redditch Borough Council and Bromsgrove District Council Level 2 Strategic Flood Risk Assessment (June 2012). Available online at: <http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/the-bromsgrove-district-plan-2011-30/core-documents/10-clean-green-and-healthy.aspx> [Accessed February 2018].

³⁵ http://www.worcestershire.gov.uk/info/20236/flood_risk_management/1046/plans_policies_and_strategies/2

- Certain land uses should be avoided in areas at high risk from flooding but in exceptional circumstances mitigation measures may be required to allow development;
- Inappropriate development in the functional floodplain should be avoided;
- A surface water flood risk assessment must be submitted for all developments over 1ha in size;
- Planning policy should safeguard areas of open space in the floodplain and also safeguard existing flood flow routes; and
- SuDS should be accommodated in all new development.

3.4.32 **Figure 3.5** shows the prevalence of Flood Zones 2 and 3 and areas benefiting from natural defences across Bromsgrove.

Figure 3.5 Major Watercourses and Flood Zones in Bromsgrove District and Adjacent Areas



Climate Change

- 3.4.33 Rising global temperatures will bring changes in weather patterns, rising sea levels and increased frequency and intensity of extreme weather. The effects of climate change will be experienced internationally, nationally and locally with certain regions being particularly vulnerable.
- 3.4.34 Carbon dioxide (CO₂) is identified as being the most important of the greenhouse gases which are being produced by human activity and contributing to climate change. According to the Intergovernmental Panel on Climate Change (IPCC), stabilising CO₂ concentrations at 450 parts per million (ppm) (that is 85 ppm above 2007 levels and 170 ppm above pre-industrial levels) in the long term would require the reduction of emissions worldwide to below 1990 levels within a few decades.
- 3.4.35 The policy and legislative context in relation to climate change has been established at the international level (Kyoto Agreement and subsequently the Paris Agreement) and has been transposed into European, national and local legislation, strategies and policies. Reducing CO₂ emissions in the atmosphere is a national target to reduce climatic impact. This is driven by the

Climate Change Act (2008), which sets a legally binding target of at least a 34% reduction in UK emissions by 2020 and at least an 80% reduction by 2050 against a 1990 baseline.

3.4.36 The main human influence on global climate is emissions of the key greenhouse gases - carbon dioxide (CO₂), methane and nitrous oxide. The accumulation of these gases in the atmosphere strengthens the greenhouse effect.

3.4.37 **Table 3.5** below shows Bromsgrove's per capita CO₂ emissions for the period 2010 to 2015. The District's emissions have fluctuated over this period but have consistently been higher than national (UK), regional and County averages. In 2015 (the latest reporting period available), per capita emissions stood at 7.5 tonnes CO₂ per person compared to 5.9 tonnes nationally, 5.8 tonnes regionally and 6.1 tonnes at the County level.

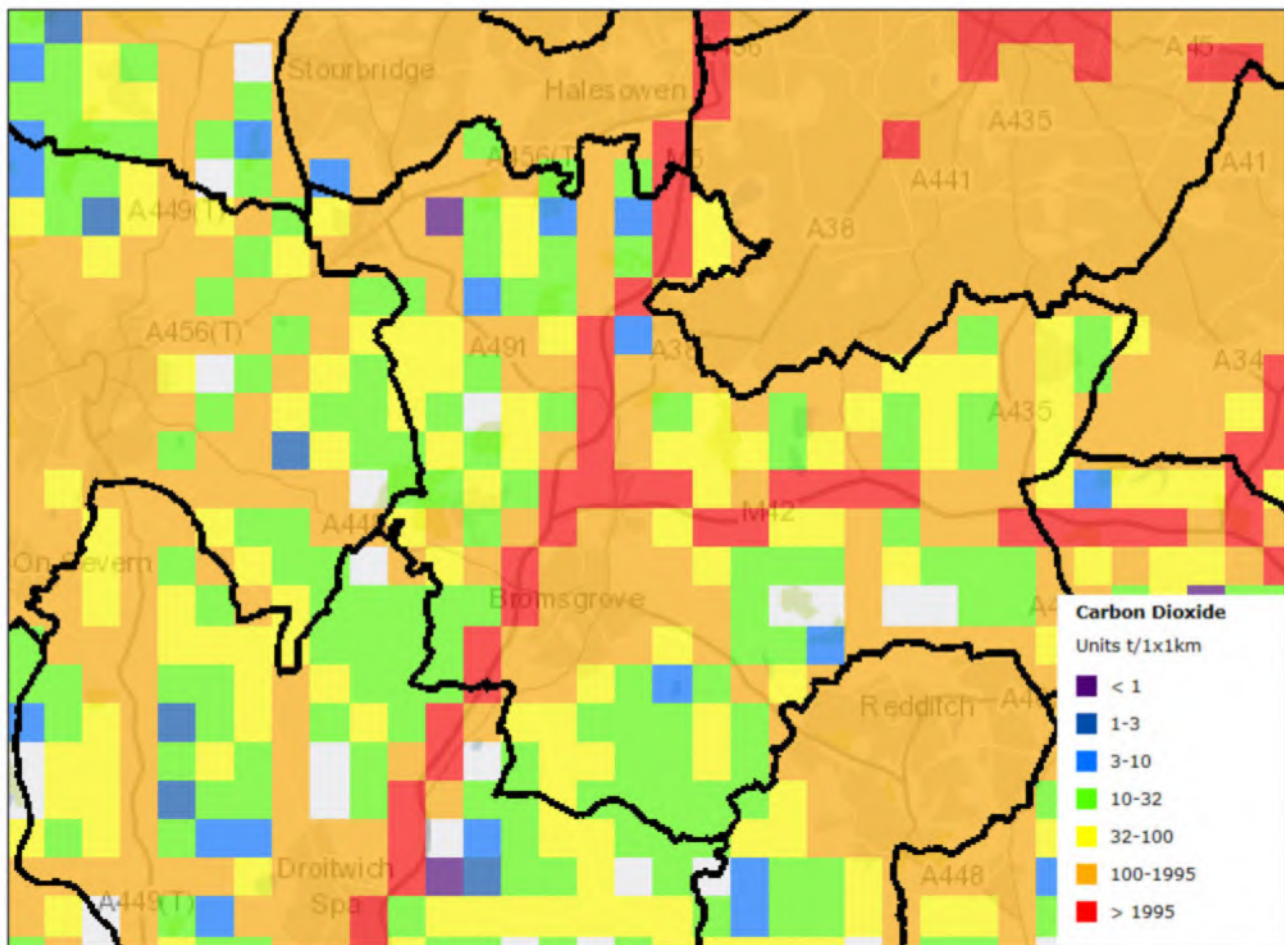
Table 3.5 CO₂ Emissions Per Capita 2010-2015 (tonnes CO₂ per person)

	Bromsgrove	Worcestershire	West Midlands	UK
2010	8.7	7.6	7.3	7.5
2011	8.0	6.9	6.7	6.8
2012	8.2	7.0	6.8	7.1
2013	8.1	6.9	6.7	6.9
2014	7.7	6.4	6.1	6.2
2015	7.5	6.1	5.8	5.9

Source: Department for Business, Energy & Industrial Strategy (2017) *Local Authority Carbon Dioxide Emissions Estimates 2015*.

3.4.38 As **Figure 3.6** and **Table 3.6** below highlight, the main source of CO₂ emissions in the District is from road transport (albeit that the total tonnes of CO₂ in 2015 was slightly lower than in 2010). This broadly reflects that the M5 and M42 motorways pass through the District.

Figure 3.6 CO₂ Emissions from Road Transport in Bromsgrove District and Adjacent Areas



Source: <http://naei.beis.gov.uk/data/gis-mapping>

Table 3.6 Per Capita CO₂ Emissions by Source 2010-2015 (tonnes CO₂ per person)

	Industry and Commercial	Domestic	Road Transport	Total
2010	128.4	231.1	453.2	812.7
2011	115.8	202.1	435.3	752.9
2012	124.2	218.2	430.9	773.0
2013	120.2	213.3	437.7	770.5
2014	115.9	178.8	441.4	734.7
2015	98.7	169.1	449.1	715.3

Source: Department for Business, Energy & Industrial Strategy (2017) *UK local authority and regional carbon dioxide emissions national statistics: 2005-2015*

3.4.39 Measures to prevent or minimise the adverse effects of climate change include: efficient use of scarce water resources; adapting building codes to future climate conditions and extreme weather events; building flood defences and raising the levels of dykes; more climate resilient crop selection

e.g. drought-tolerant species. The UK Government considers the development of a low carbon economy combined with a greater proportion of energy generated by renewable means as essential. The UK Low Carbon Transition Plan 2009 sets out a number of key steps which need to be taken in order to reach the UK's low carbon objectives. These include an intention to produce 30% of the UK's electricity by renewable and low carbon means by 2020. Reducing levels of energy consumption and increasing efficiencies in the use of fossil fuels will also help to reduce CO₂ emissions.

- 3.4.40 The autumn and winter floods in 2000 in the UK were the worst for 270 years in some areas. Flooding on farmland cost the farming industry nearly £500 million. The flooding events in June/ July 2007 were estimated to cost the Worcestershire County Council £9 million of which £6³⁶ million was estimated for the repairs carried out by the Highways Department.
- 3.4.41 Bromsgrove District and Redditch Borough Council's published a Climate Change Strategy & Action Plan in December 2010 (Updated in June 2011). The strategy's aim is to provide a policy framework in which the two Authorities can reduce both their own and their communities carbon footprints, mitigate against climate change and identify how best to adapt for the risks and opportunities for future climate change. The strategy includes the following objectives:
- Measure and monitor our current carbon emissions baseline as organisations and communities;
 - Set targets to reduce CO₂ emissions from buildings, vehicles and other activities in our area;
 - Communicate widely and promote active engagement; support innovative change and the development of a greener local economy;
 - Embed strategic climate change activity (mitigation, adaption and raising awareness) across the Council and its partners;
 - Ensure all development is sustainable, minimises CO₂ emissions and accounts for future climates; and
 - Identify the likely changes in climate locally and risk assess against them.

Likely Evolution of the Baseline without the District Plan

- 3.4.42 Noise issues from motorway traffic are likely to continue remain a problem for the District, however responsibility to address this lies with Highways England therefore this is outside of the scope of local planning policy intervention. However, noise emissions from A roads are something which can be influenced by local planning policy intervention through for example measures to promote sustainable modes of transport and reduce car use and in turn traffic levels on local roads.
- 3.4.43 Bromsgrove does suffer from air quality issues, particularly so in the designated AQMA's. Without a District Plan, air quality would remain relatively the same. An increase in population and households in the District will in-turn generate additional transport movements and associated emissions to air. Without the District Plan there would be a significant policy gap with regard to the location of future growth and which could result in development being located in areas that are not well served by community facilities and services and jobs thereby increasing traffic movements.
- 3.4.44 Forecast population growth and new development would result in an increase in the waste produced by Bromsgrove in the future. Many of the tools to reduce the amount of waste produced

³⁶ Figures from Planning for Water in Worcestershire, (2011). Available online at <http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/the-bromsgrove-district-plan-2011-30/core-documents/10-clean,-green-and-healthy.aspx> [Accessed February 2018]

and increase reuse and recycling are outside the scope of the land use planning system and Bromsgrove already has a well-established waste treatment facility which deals with a lot of the District's waste. The absence of a District Plan will not unduly influence this aspect. However, the District Plan can facilitate improvements to this network and the delivery of new capacity in appropriate locations and that there is a framework to enable the provision of sufficient landfill capacity for waste that cannot be reused, recycled or recovered.

- 3.4.45 Taking into account national planning policy set out in the NPPF and current Development Plan policy, it is expected that flood risk would be managed without the District Plan (although flood risk and the process of coastal change may increase as a result of climate change). Notwithstanding this, local planning policy would help to ensure that new development is located away from flood risk areas/coastal erosion, that any development proposals within such areas are resilient to flooding and could help to ensure that any investment in flood defence infrastructure required to accommodate development is identified and delivered in a timely manner.
- 3.4.46 Climate change is occurring and will continue regardless of local planning policy intervention. However, national policy on climate change, extant Development Plan policy and other plans and programmes alongside Building Regulations will help to ensure that new development is located and designed to adapt to the effects of climate change and that measures are in place to mitigate climate change. Notwithstanding, without the District Plan the Council is likely to have less control over, in particular, the location of new development which could exacerbate climate change impacts and mean that opportunities to adapt to and mitigate effects (for example, through reducing transport movements, tree planting and decentralised renewable energy solutions) may be missed. This could result in damage to properties, infrastructure and stress on emergency services and also have an effect on biodiversity, which could lead to ecosystem changes.
- 3.4.47 In June 2009 the findings of research on the probable effects of climate change in the UK was released by the UK Climate Change Projections team under Defra³⁷. This team provides climate information for the UK up to the end of this century and projections of future changes to the climate are given, based on simulations from climate models. Projections are broken down to a regional level across the UK and illustrate the potential range of changes and the level of confidence in each prediction.
- 3.4.48 The predicted effects of climate change for the West Midlands region by 2050 (under a medium emissions scenario) are set out in **Table 3.7** below.

Table 3.7 West Midlands Climate Predictions (medium emissions scenario)

Climate Record	Estimate of Increase/Decrease	Most Likely Range	Range of Uncertainty
Winter mean temperature	2.1 °C	1.2°C to 3.2°C	0.9°C to 3.5°C
Summer mean temperature	2.6°C	1.2°C to 4.4°C	1°C to 4.8°C
Summer mean daily maximum temperature	3.6°C	1.3°C to 6.5°C	1.1°C to 7.2°C
Summer mean daily minimum temperature	2.7°C	1.1°C to 4.8°C	1°C to 5.3°C

³⁷ See <http://ukclimateprojections.metoffice.gov.uk/21708?projections=23754> [Accessed April 2015]

Climate Record	Estimate of Increase/Decrease	Most Likely Range	Range of Uncertainty
Annual mean precipitation	0%	-5% to 6%	-6% to 6%
Winter mean precipitation	13%	2% to 27%	1% to 30%
Summer mean precipitation	-17%	-37% to 6%	-39% to 14%

Source: Defra (2009)

Key Sustainability Issues

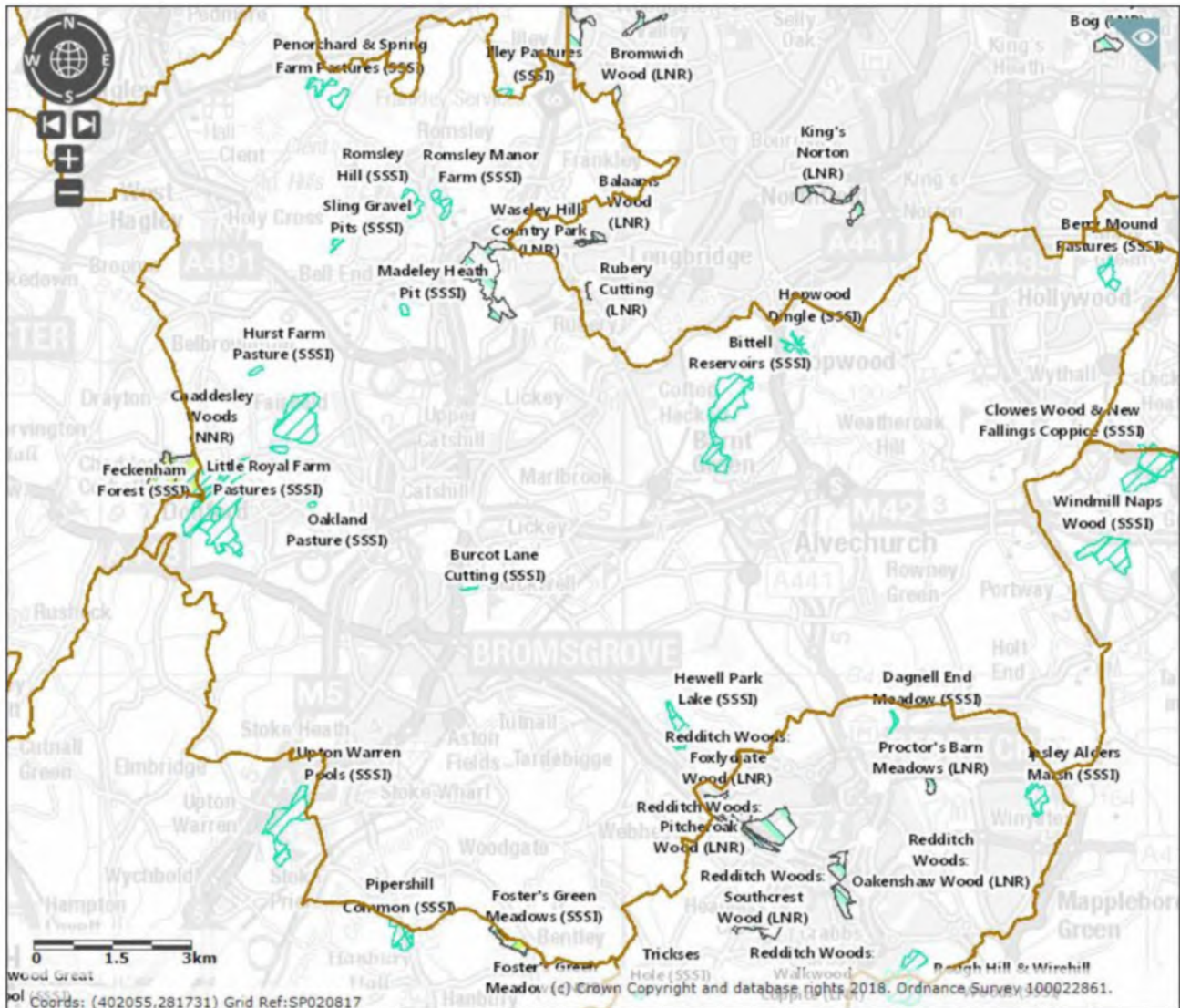
- The need to improve air quality, particularly in the four AQMAs;
- The need to minimise waste arisings and encourage re-use and recycling;
- The need to ensure that new development is adaptable to the effects of climate change;
- The need to mitigate climate change, including through increased renewable energy provision;
- The need to locate new development away from areas of flood risk, taking into account the effects of climate change; and
- The need to ensure the timely provision of flood defence/management infrastructure.

3.5 Biodiversity, Geodiversity and Green Infrastructure

Biodiversity

- 3.5.1 Biodiversity is defined as the variety of plants (flora) and animals (fauna) in an area, and their associated habitats. The importance of preserving biodiversity is recognised from an international to a local level. Biodiversity is important in its own right and has value in terms of quality of life and amenity.
- 3.5.2 Bromsgrove District has a rich and varied natural environment including a range of sites designated for their habitat and conservation value. **Figure 3.7** shows designated nature conservation sites within and in close proximity to the District.

Figure 3.7 Designated Nature Conservation Sites Within and in Proximity to Bromsgrove District



Source: <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

- 3.5.3 Sites of European importance (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)) are designated to conserve natural habitats and species of wildlife which are rare, endangered or vulnerable in the European Community. In the UK, these form part of the 'Natura 2000' network of sites protected under the EC Habitats Directive (1992). There are no European designated sites in Bromsgrove District itself although the European designated Lyppard Grange Ponds SAC and Fen Pools SAC are within 15km of the administrative boundary.
- 3.5.4 The District contains 13 Sites of Special Scientific Importance (SSSIs) (three of which are for geological importance). The condition of the 10 non-geological SSSIs is set out in **Table 3.8** below. Although half of the SSSIs in the District are in favourable condition, five are in unfavourable condition with two (Berry Mound Pastures and Romsley Manor Farm) declining in their condition.

Table 3.8 Condition of SSSIs within Bromsgrove District

Site	Area (ha)	Condition (% of area)
Hurst Farm Pasture	2.29	100% favourable
Little Royal Farm Pastures	3.32	100% favourable
Oakland Pasture	1.03	100% unfavourable (no change)
Penorchard & Spring Farm Pastures	15.44	100% favourable
Romsley Hill	13.64	100% unfavourable (recovering)
Romsley Manor Farm	9.07	100% unfavourable (declining)
Bittell Reservoirs	65.76	66.36% unfavourable (recovering) 33.64% unfavourable (no change)
Berry Mound Pastures	11.81	100% unfavourable (declining)
Hewell Park Lake	21.07	100% favourable
Hopwood Dingle	7.1	100% favourable

Source: Natural England (various) Designated Sites Condition Summaries

- 3.5.5 Chaddersley Wood National Nature Reserve is: an Ancient Woodland; a Local Wildlife Site (LWS); a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI). Other nature reserves in the District include Upton Warren, which is Worcestershire's premier bird-watching reserve (it attracts birds throughout the year) and Hanbury Woods.
- 3.5.6 In addition to the statutorily recognised SSSIs, there 90 Local (Wildlife) Sites (five of which are recognised for geological value). These sites are varied in nature ranging from whole valleys and hills to canals and ponds. These sites range in type from grassland and meadows to broadleaved woodland and ancient semi-natural woodland. Information is not presently available about the condition of these areas.
- 3.5.7 The Worcestershire Biodiversity Action Plan (BAP) identifies the most important species and habitats in the area. The BAP identifies 25 priority species and 19 priority habitats across Worcestershire. Action Plans have been developed for the following habitats: arable farmland; ancient and species-rich hedgerows; scrub; woodland; veteran trees; wet woodland; reedbeds; fen and marsh; wet grassland; grassland; lowland heathland; road verges; urban; canals; ponds and lakes; rivers and streams. Of particular importance for Bromsgrove is the maintenance and enhancement of hay meadows, acid grassland, veteran trees, canals and urban areas.
- 3.5.8 BAP Action Plans have been developed for the following species: Otter; Dormouse; Water Vole; Noble Chafer; Bats; Nightingale; Shad; Adder; Slow Worm; Great Crested Newt; White Clawed Crayfish; High Brown Fritillary; Brown Hairstreak; Club Tailed Dragonfly; Violet Click Beetle, Hornet Robberfly, Farmland Birds, Wood White, Grizzled Skipper, Pearl Border Fritillary, Common Fan Foot, and Drab Looper. Priority species of particular importance for Bromsgrove are water voles and bats. The District is recognised as providing an important area for water voles and projects have taken place to enhance sites and waterways, including a major river restoration project in Sanders Park³⁸.

³⁸ Worcestershire Wildlife Trust Bromsgrove District Overview. Available via: <http://www.worcswildlifetrust.co.uk/sites/worcestershire.live.wt.precedenthost.co.uk/files/Bromsgrove%20District.pdf> [accessed February 2018]

- 3.5.9 The Worcestershire Biodiversity Partnership has produced a series of Biodiversity Delivery Areas Statements to spatially and strategic indicate priority areas to deliver the BAP. Two of these cover areas in the south of the District: the Forest of Feckenham and Bow Brook³⁹. Priorities for these areas include habitat creation and restoration to increase connectivity and buffering of key sites and to strengthen networks for species.

Geodiversity

- 3.5.10 The geology of Bromsgrove is rich and varied. Bromsgrove District overlies a variety of geology types. The Permo-Triassic Sandstones occupy the centre and north western parts of the District. Bromsgrove Town Centre, Catshill, Lickey End, Cofton Hackett, Belbroughton and Hagley are underlain by the Permo-Triassic Sandstones. In the far north of the District, around Clent, Romsley and Frankley, the geology comprises of the Carboniferous Coal Measures. These consist of inter-bedded mudstones, siltstones and sandstones with coal and limestone horizons. The remainder of the area is dominated by the Triassic Mercia Mudstones. These consist of mudstones with sandstone skerries and halite bands.
- 3.5.11 In places this solid geology is overlain by clays, silts, sands and gravels associated with the main watercourses crossing the District. The clay drift deposits are however more laterally extensive in the far east of the area around Hollywood and Wythall.
- 3.5.12 There are three geological SSSIs in the District (Table 3.9 and Figure 3.6 above). **Table 3.9** below shows their condition. The condition of these sites is mixed. Madeley Heath Pit SSSI has been identified as being destroyed, whilst Sling Gravel Pits is unfavourable but recovering and Burcot Lane Cutting is in a favourable condition.

Table 3.9 Condition of Geological SSSIs within Bromsgrove District

Site	Area (ha)	Condition (% of area)
Madeley Heath Pit	2.74	100% destroyed
Sling Gravel Pits	1.05	100% unfavourable (recovering)
Burcot Lane Cutting	0.38	100% favourable

Source: Natural England (various) Designated Sites Condition Summaries.

- 3.5.13 Regionally Important Geological and Geomorphological Sites (RIGS) are the most important places for geology and geomorphology outside statutorily protected land such as SSSI. Whilst not benefiting from statutory protection, RIGS are equivalent to Local Wildlife Sites. There is a total of five RIGS in the District: Shepley Sandpit and Knoll; Kendal End Farm; Lickey Hill Quarry; Madeley Heath Pit; and Hagley Hall Quarry. There are also 100 further sites that are of particular geological interest located within the District. The rich geodiversity of Bromsgrove District is recognised as a key asset of the District in the Worcestershire Geodiversity Action Plan⁴⁰.

³⁹ Worcestershire Biodiversity Partnership (2016) Biodiversity Delivery area Statement. Available via: http://www.worcestershire.gov.uk/downloads/download/1087/biodiversity_delivery_area [accessed February 2018]

⁴⁰ Earth Heritage Trust Worcestershire Geodiversity Action Plan. Available via: <http://www.earthheritagetrust.org/pub/category/local-gaps/> [accessed February 2018]

Green Infrastructure

3.5.14 Green infrastructure encompasses all “green” assets in an authority area, including parks, river corridors, street trees, managed and unmanaged sites and designed and planted open spaces. A Green Infrastructure Baseline Report⁴¹ was published for the District in 2010 and updated in 2013. The study identified the baseline green infrastructure assets in the District. These assets include:

- Three country parks (Clent Hills, Waseley Hills and Lickey Hills);
- The river corridors;
- The wider open countryside;
- Amenity open space, allotments and sports pitches; and
- The 85 Local Wildlife Sites in the District.

3.5.15 The broader Worcestershire Green Infrastructure Strategy⁴² sets out the strategic vision for green infrastructure across the wider county. The document identifies 30 Environmental Character Areas within Worcestershire. These have been identified to help achieve a network of strategic and local green corridors across the county. Seven of these areas fall within the District. The priorities for each area are set out in **Table 3.10** below.

Table 3.10 Priorities from the Worcestershire Green Infrastructure Strategy

Character Area	Green Infrastructure Priorities
Severn Valley North	<ul style="list-style-type: none"> • Enhance stream and river corridors • Protect ancient countryside character • Protect and enhance the ancient woodland habitats of the Wyre Forest • Enhance and expand acid grassland habitats • Provision of a strategic asset for access and recreation
North Worcestershire Hills	<ul style="list-style-type: none"> • Maintain wooded character, linking and buffering existing sites • Provision of a strategic asset for access and recreation
Forest of Feckenham and Feckenham Wetlands	<ul style="list-style-type: none"> • Protect the traditional field patterns, boundaries and small woodlands. • Enhance stream/ordinary watercourse corridors.
Hagley Hinterland	<ul style="list-style-type: none"> • Maintain and restore habitat connectivity. • Protect and restore acid grassland and wooded habitats.
Hollywood & Wythall	<ul style="list-style-type: none"> • Protect and restore historic pattern of small enclosures
Bromsgrove-Redditch Corridor	<ul style="list-style-type: none"> • Protect and restore the ancient countryside character.
Mid-Worcestershire Corridor	<ul style="list-style-type: none"> • Protect and restore neutral grasslands, orchards and semi-natural ancient woodland, wet woodland and stream corridors. • Provision of strategic asset for access and recreation

Source: Worcestershire Green Infrastructure Strategy

⁴¹ Bromsgrove District Council (2013) Green Infrastructure Baseline Report Available via: <http://www.bromsgrove.gov.uk/media/751926/GI-Baseline-Report-2013.pdf>

⁴² Worcestershire Green Infrastructure Partnership (2013) Worcestershire GI Strategy document 2013-2018 Available via: http://www.worcestershire.gov.uk/download/downloads/id/3780/worcestershire_gi_strategy_document_2013-2018.pdf

Likely Evolution of the Baseline Without the District Plan

- 3.5.16 Information in relation to the SSSIs in the District shows that although half of the sites are in favourable condition, half are in unfavourable condition (with two of these in a declining state). It is reasonable to assume that without the District Plan review, existing trends would continue. Local policy in the existing District Plan and national planning policy contained in the NPPF would help to ensure that new development protects and enhances biodiversity but strategic opportunities to enhance biodiversity may be missed.
- 3.5.17 With regards to the District's geodiversity, it is noted that although one SSSI (Burcot Lane Cutting) is in favourable condition, another site (Madeley Heath Pit) has been destroyed and Sling Gravel Pits in unfavourable but recovering condition. Without the new District Plan, it is expected that the condition of these sites would continue given the national protection afforded to SSSIs. There are a number of other geological assets in the District. New development could increase pressure on these geological assets, the risk of which could be increased without clear up-to-date District Plan policy seeking to protect and enhance the District's geodiversity.
- 3.5.18 The Worcestershire Green Infrastructure Strategy identifies seven character areas with accompanying green infrastructure priorities. There is an opportunity, through the preparation of the new District Plan, to plan at the strategic level for new green infrastructure provision and improvements to these recognised areas in the District. This could also provide biodiversity enhancements through, for example, habitat creation schemes.

Key Sustainability Issues

- The need to conserve and enhance biodiversity including sites designated for their nature conservation value;
- The need to maintain, restore and expand the District's priority habitats;
- The need to protect and enhance sites designated for their geological interest; and
- The need to safeguard and enhance the green infrastructure network, helping to meet the priorities of the Worcestershire Green Infrastructure Strategy.

3.6 Landscape, Townscape and the Historic Environment

Landscape and Townscape

Landscape

- 3.6.1 The landscape within Bromsgrove is a major attraction. Located on the southern border of the West Midlands conurbation it provides swathes of open countryside, immediately adjacent to an area of dense urban form. The County Council undertook a Landscape Character Assessment in 2004⁴³ of Worcestershire. This was based on work previously done in the mid 1990's by the Countryside Agency which resulted in a character map of the whole of England. The assessment took a holistic view looking at the landscape as a whole and identify what makes one landscape different from another. Bromsgrove is primarily made up of 10 different landscape character types (excluding urban): Estate Farmlands, Principal Settled Farmlands, Principal Timbered Farmlands,

⁴³ Worcestershire County Council Landscape Character Assessment

Principal Wooded Hills, Sandstone Estatelands, Settled Farmlands with Pastoral Land Use, Timbered Pastures, Timbered Plateau Farmlands, Wooded Estatelands and Wooded Hills and Farmlands.

- 3.6.2 As highlighted above, the District has a landscape primarily dominated by farmland and wooded hills. The main concentration of built form is Bromsgrove Town which sits at the bottom of the Lickey Hills. The District slopes down from the Birmingham plateau and merges into a rolling and undulating landscape. The District also contains large areas of ancient woodland.
- 3.6.3 The District comprises the Arden National Landscape Character Area⁴⁴. Arden Landscape Character Area (LCA) comprises of farmland and former wood-pasture lying to the south and east of Birmingham, including part of the West Midlands conurbation. Traditionally regarded as the land lying between the River Tame and the River Avon in Warwickshire, the Arden landscape also extends into north Worcestershire to abut the Seven and Avon Vales. To the north and north east it drops down to the open landscape of the Mease/Sence Lowlands. The eastern part of the LCA abuts and surrounds Coventry, with the fringes of Warwick and Stratford-upon-Avon to the south. This LCA has higher ground to the west, the Clent and Lickey Hills to the east and the Nuneaton ridge. The landscape of the lower lying central area is gently rolling with small fragmented semi-natural and ancient woodlands. Mature oaks set in hedgerows, distinctive field boundaries, historic parklands and narrow river corridors are key features, all on the doorstep of a heavily urbanised area.
- 3.6.4 Land use throughout the area is mainly residential, agricultural and industrial including coal mining, which is still active in the north-east of the LCA. Numerous transport corridors, road, rail, air and canal run through the area. There is likely to be increased development and greater pressure upon the existing infrastructure, particularly around Birmingham, Coventry and the main towns. The LCA profile of Arden also notes that this LCA among the most geologically diverse and this has a strong impact on the landscape's character and development and is further reflected in the range of locally and nationally important geological assets across the LCA.
- 3.6.5 The LCA profile identifies the following landscape opportunities for this area:
- Conserve, enhance and restore the area's ancient landscape pattern of field boundaries, historic (including farm) buildings, moated sites, parkland and pasture and reinforce its well wooded character;
 - Protect and manage woodlands particularly ancient woodlands and wood pasture to maintain the character of Arden;
 - Manage and restore hedgerows especially in the north-eastern part of the area (enclosure patterns) and restore parkland, ancient trees and stream side trees plus manage and replace in-field trees and hedgerow trees;
 - Maintain and restore areas of heathland particularly in southern Arden, Arden Parklands and Birmingham Hills, lowland meadows and pastures and floodplain grazing marshes;
 - Manage arable cultivation to encourage rare arable plants and range-restricted farmland birds and mammals, following appropriate management options under Entry Level Stewardship;
 - Restore habitats associated with river valleys particularly the Blythe and Tame; and

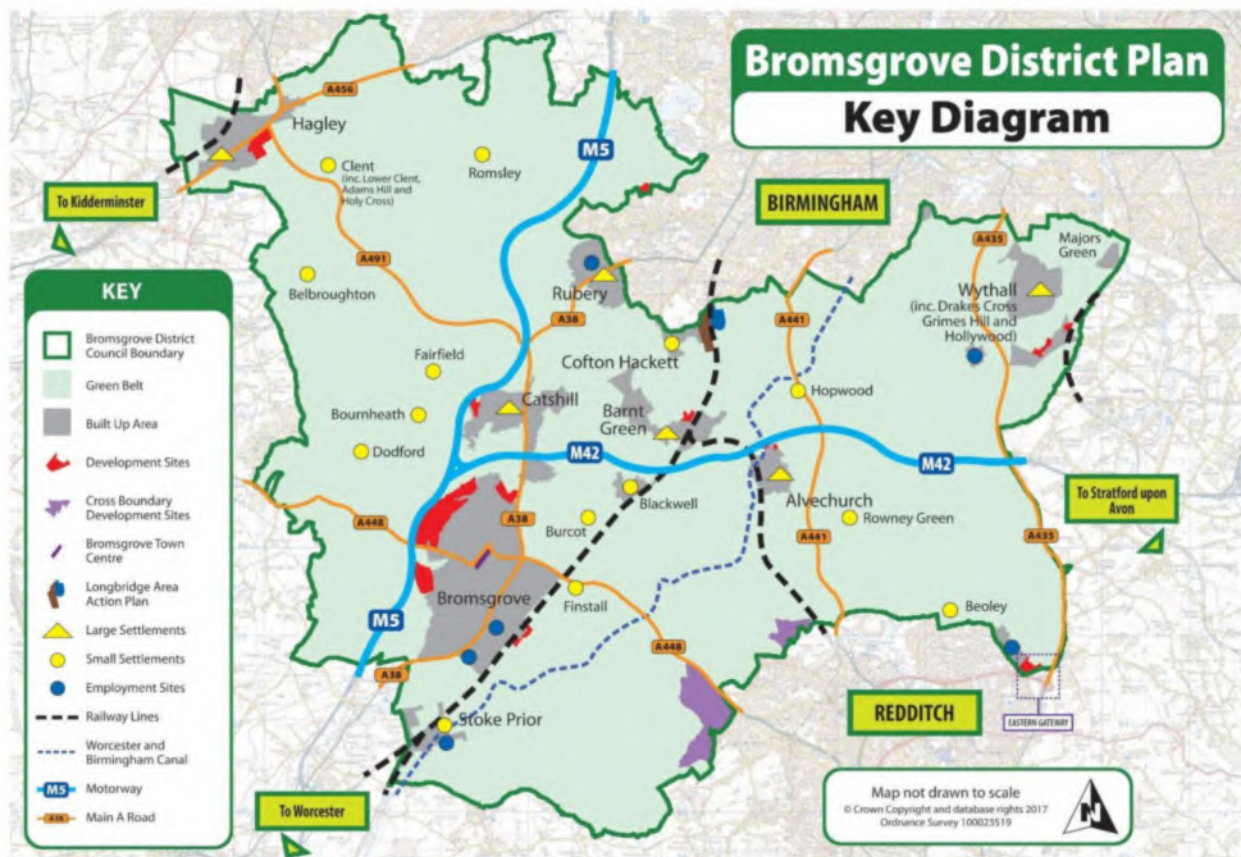
⁴⁴ Natural England has divided England into 159 distinct natural areas. Those for the West Midlands can be viewed at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands> [Accessed February 2018]

- Create new green infrastructure with associated habitat creation and new public access on former mining sites and close to urban populations in the West Midlands Green Belt.

3.6.6

There are no national landscape designations within the District, although the West Midlands Green Belt covers some 90% of the District (see **Figure 3.8** below).

Figure 3.8 Green Belt in Bromsgrove



Townscape

3.6.7

Bromsgrove Town Centre has been the subject of a regeneration scheme. The Bromsgrove Townscape Heritage Initiative (THI) is a £1.6 million heritage-led regeneration grant scheme. The main objective of the scheme is to increase the economic activity in the town's core by using the historic environment as a positive resource, whilst improving the quality of life for the local community and visitors. The schemes that have been completed to date have assisted in restoring shopfronts, historic architectural features, the repair of historic buildings and improving the street scene which has helped make Bromsgrove Town more attractive and vibrant.

3.6.8

The scheme has aimed to contribute to the regeneration of the Town Centre by working in partnership with local businesses and partners to repair and enhance historic properties in a specific area of High Street and Worcester Road, using traditional techniques, methods of construction and high quality natural or traditional materials. Works are ongoing in the town

centre with an independent men's clothing store (Carter Esquire) the latest to benefit from this initiative⁴⁵.

Cultural Heritage

- 3.6.9 Bromsgrove Town is a market town whose origins can be traced to pre-Roman times. In the medieval period Bromsgrove was a prosperous centre for the wool trade and far more important than the obscure village of Birmingham to the north. The decline of the woollen industry was offset by the arrival in the 17th century of French Huguenots who brought with them a new craft – nailmaking. Bromsgrove became the world centre for the manufacture of nails and outlying villages specialised in other metal products e.g. Belbroughton Sythes. Nail-making declined at the end of the 19th century as increased mechanisation rendered the outworking system obsolete. Only traces of the nail-making industry now remain.
- 3.6.10 New activities sprang up related to the motor industry and local people began to look to Birmingham and the Black Country for employment. Garringtons, once reputedly Europe's largest forging works grew as a shadow factory of the Austin Works to supply the car industry. In recent times Bromsgrove has experienced a considerable increase in population and has become a major commuting centre for the West Midlands conurbation and further afield.
- 3.6.11 The District has 469 Listed Buildings, 839 known sites of Archaeology Interest (13 of which are Scheduled Ancient Monuments), 12 Conservation Areas designated as being areas of special architectural or historic interest and 2 registered parks and gardens (Hagley Park and Hewell Grange) and also a number of other historic parks of regional importance. Unlike well-known neighbours Worcester and Stratford, which are nationally recognised historical centres, Bromsgrove is not known for its historical connections or rich variety of historical buildings. However, a rich largely 'hidden' history does exist that needs to be protected and recognised as the District changes and develops over time.
- 3.6.12 The Listed Buildings range from the Grade I listed Hagley Hall and St John's Church in Bromsgrove, through a variety of rural buildings including two windmills, to a 1950s house in Hopwood. The conservation areas include a stretch of the Worcester and Birmingham Canal and the Chartist settlement at Dodford. The section of the Birmingham and Worcester Canal includes Tardebigge Flight, comprising of 30 locks, all of which are listed.
- 3.6.13 The District has many locally important buildings that do not qualify for statutory listing but nevertheless are important to the distinctive character of the Bromsgrove area. These include cottages and workshops relating to the nail-making industry. The Council is planning to commence a local list survey to ascertain the number, type and location of locally important buildings. There is also potential for undesigned assets and archaeology on some sites within the District.
- 3.6.14 A national register⁴⁶ of heritage sites at risk is produced annually by Historic England and includes ancient monuments, Grade I and II* Listed Buildings and Conservation Areas at risk. In Bromsgrove there are 2 Grade I Listed Buildings, 1 Grade II Listed Building and 2 Grade II* Listed Buildings on the list and 1 Grade II* Registered Park and Garden. The condition of these assets varies, for example the Grade II Listed Christ Church in Catshill is in poor condition and priority category A as it is at immediate risk of further rapid deterioration, whilst the Church of St Michael is in poor

⁴⁵ Story highlighted in the Bromsgrove Standard: <https://bromsgrovestandard.co.uk/news/independent-mens-clothes-store-in-bromsgrove-is-latest-to-benefit-from-townscape-heritage-initiative/> [Accessed February 2018]

⁴⁶ Register for Bromsgrove available at <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?advsearch=1&district=Bromsgrove&searchtype=harsearch> [Accessed 20/02/18]

condition but in priority category C as there is slow decay and no solution agreed to address. There is also a conservation area in Bromsgrove Town Centre on the 'at risk' list but whilst this is described as in '*very bad*' condition the trend is '*improving*'.

3.6.15 There are 839 known sites of archaeology interest in the District. Sites vary from upstanding monuments to sites inferred from historical documents, from buried remains to listed buildings, and from earthworks to artefacts. Of these known sites, 13 are Scheduled Ancient Monuments. They are:

- 1. Wychbury Camp;
- 2. Berry Mound Camp, Solihull;
- 3. The Mount;
- 4. Standing cross in St Leonards churchyard;
- 5. Moated site at Fairfield Court;
- 6. Moated site 130m north east of Moorgreen Farm;
- 7. Moated site at Blackgreves Farm;
- 8. The Banqueting Orchard moated site, 650m north west of Bentley village hall;
- 9. Moated site at Tardebigge Farm;
- 10. Moated site of Frankley Hall;
- 11. Dodford Priory moated site;
- 12. Moated site and fishponds at the Bishop's Palace; and
- 13. Churchyard cross in St Leonard's churchyard.

3.6.16 The diversity of designated and non-designated heritage and archaeological sites form a key component of the historic landscape of the District. The high proportion of Green Belt throughout the District has preserved a relatively coherent post medieval landscape. Large 20th century development has largely overwritten historic landscape character in undesignated areas such as Hagley Village and Hollywood.

3.6.17 A Historic Environment Assessment has been carried out and the results have produced 36 distinctive Historic Environment Character Zones in the District. Archaeological survival and potential varies across the District. Reasons for this include marked differences in historic landscape character, archaeological features present and 20th century land management.

Likely Evolution of the Baseline without the District Plan

3.6.18 New development is likely to place pressure on the District's landscape. Whilst national planning policy set out in the NPPF and the Council's adopted Development Plan would continue to offer some protection and guidance, without up to date local policy provision there is the potential that development could be inappropriately sited and designed. This could adversely affect the landscape character of the District. Further, opportunities may not be realised to enhance landscape character through, for example, the provision of green infrastructure or the adoption of high quality design standards which reflects local character.

3.6.19 It is reasonable to assume that the majority of Bromsgrove District's designated heritage assets would be protected without the District Plan (since works to them invariably require consent). However, elements which contribute to their significance could be harmed through inappropriate

development in their vicinity. Opportunities to enhance assets may also be missed. Further, other non-designated elements which contribute to the character of the area could be harmed without an up-to-date policy framework. Notwithstanding, it is recognised that national planning policy set out in the NPPF and current Development Plan policy and associated guidance would together provide a high level of protection in this regard.

Key Sustainability Issues

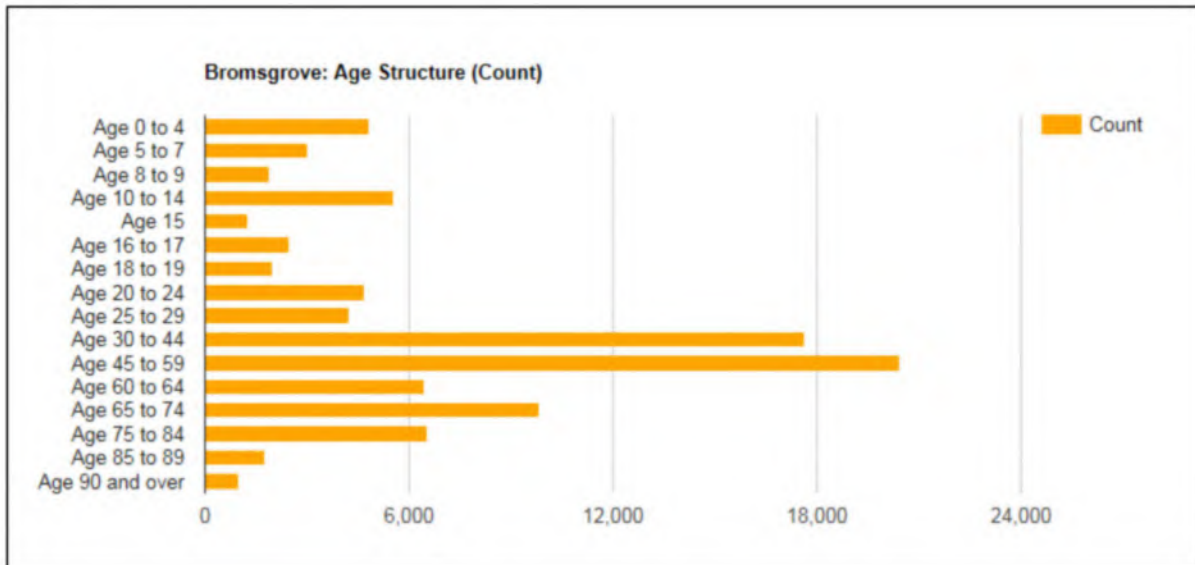
- The need to conserve and enhance the District's landscape character;
- The need to protect and enhance the Green Belt and the openness of the Green Belt;
- The need to promote high quality design that respects local character;
- The need to protect and enhance the District's townscapes;
- The need to protect and enhance the District's cultural heritage assets and their settings;
- The need to avoid harm to both designated and non-designated heritage assets, including with respect to their setting;
- The need to tackle heritage at risk, particularly those assets on the heritage at risk register classed as at highest risk;
- The need to recognise the contribution made by the historic environment to the character of landscapes and townscapes; and
- The need to make the most of the opportunities the historic environment poses to contribute to other subject areas of the local plan and quality of life.

3.7 Healthy and Inclusive Communities

Population

- 3.7.1 At the time of the 2011 Census Bromsgrove had a population of 93,637. This was an increase of approximately 6.6% over the 10 years since the 2001 Census and was the second highest population growth in Worcestershire over this period. It was higher than the population growth for Worcestershire (4.4%) and the West Midlands (6.3%), but lower than the average across England and Wales (7.8%).
- 3.7.2 The majority of the District's population live within the main population centres of Bromsgrove Town (32,331), Alvechurch (3,534), Barnt Green (1,794), Catshill (4,470), Hagley (6,261), Rubery (5,868) and Wythall (8,261), and with a number of small rural settlements accounting for the remainder of the population.
- 3.7.3 The population structure at the time of the 2011 census is set out in **Figure 3.9** below.

Figure 3.9 Population Structure: Census 2011



Source: UK Census Data

- 3.7.4 In respect of the aging population, there is predominantly a higher proportion of 65+ aged residents living in the District's less built-up Wards, the exceptions being St. Johns (27.9%, 16.9 persons per hectare (pph)) and Sidemoor (21.2%, 28.1pph) Wards, as shown in **Table 3.11** below. Their higher levels of 65+ aged residents could be attributed to the levels of care home facilities within these Wards.

Table 3.11 Ward Density

Ward (2011)	65+ years (%)	Ward Density (Persons Per Hectare)
Woodvale	22.77	0.8
Tardebigge	13.34	1.0
Uffdown	27.35	1.2
Alvechurch	23.05	1.7
Furlongs	24.14	1.9
Stoke Prior	22.01	2.2
Wythall South	25.99	3.2
Linthurst	19.42	4.1
Hillside	24.07	4.6
Hagley	22.38	6.3
Drakes Cross & Walkers Heath	23.11	6.4
Beacon	26.13	9.6
Hollywood & Majors Green	28.37	10.7
Marlbrook	21.76	11.1

Ward (2011)	65+ years (%)	Ward Density (Persons Per Hectare)
Waseley	19.98	15.3
St Johns	27.85	16.9
Norton	13.46	20.2
Catshill	16.68	22.5
Whitford	16.32	24.4
Sidemoor	21.16	28.1
Charford	12.97	42.8
Slideslow	13.7	45.2
Stoke Heath	13.14	54.9

- 3.7.5 2011 Census data revealed that the vast majority of the population of Bromsgrove are classed as White British (93.6%) which is an increase of 0.8% on 2001 Census data; the remainder is split between several other ethnic groups. Christianity is the dominant religion within the District (68.1% of the population). However, this is a drop from the 2001 Census figure, which recorded 80.1% of the population in this category. The next largest religious group are those with no religion (22%), which has almost doubled since the 2001 Census (11.8%). The rest of the population is split relatively evenly between the other major religions, ranging from 0.1% (Jewish) to 0.6% (Sikh). These figures indicate the lack of a significant ethnic minority population in the District⁴⁷.

Health

- 3.7.6 The 2017 Health Profile for Bromsgrove⁴⁸ sets out the following statistics for the District: The health of people in Bromsgrove is varied compared with the England average. Bromsgrove is one of the 20% least deprived districts/unitary authorities in England, however about 11% (1,700) of children live in low income families, which is similar to the 2011 figure of 1,710.
- 3.7.7 Life expectancy for both men and women is similar to the England average. Men in Bromsgrove have a life expectancy of 79.4 years very slightly lower than the England average of 79.5 years, whilst women in Bromsgrove have an average life expectancy of 83.7 years compared to an England average of 83.1 years. Life expectancy is 7.2 years lower for men and 3.8 years lower for women in the most deprived areas of Bromsgrove compared to the least deprived areas. The 2011 Health Profile statistics indicated that male life expectancy was 4.9 years lower in the most deprived areas of Bromsgrove when compared to the least deprived areas. This is a substantial decline. The reasons for this decline in male life expectancy are not fully understood, however provisional analysis from ONS shows there was an increase nationally in age-standardised mortality rates in 2015.
- 3.7.8 In adult health, the rate of alcohol-related harm hospital stays was 598 stays in 2015/16, compared to 1,710 stays in 2009/10. The rate of self-harm hospital stays was 152 stays in 2015/16, which is

⁴⁷ UK Census Data <http://www.ukcensusdata.com/bromsgrove-e07000234#sthash.YIWLY6KR.dpbs>

⁴⁸ <http://fingertips.phe.org.uk/profile/health-profiles>

very similar to the 2009/10 rate of hospital stays. Rates of sexually transmitted infections, TB and early deaths from cardiovascular diseases were better than average⁴⁹ for the reporting periods.

- 3.7.9 According to the Active Lives Adult Survey⁵⁰, 60.6% of the population, nationally are considered to be active, doing the recommended 150 minutes or more of physical activity per week. The survey showed that in Bromsgrove, activity levels are above the national average, with 63.5% of the population doing 150 minutes or more of physical activity per week, however over a third of the Districts population still have insufficient physical activity levels, which increases the risk of ill health and mortality.
- 3.7.10 While Bromsgrove performs better than the national average for many health outcome indicators, there are some areas of concern where Bromsgrove is much worse than the national average. In Bromsgrove, 67.5% of adults are classified as overweight or obese which is significantly higher than the national average of 64.8%. Numbers of children aged 10-11 (Year 6) classified as obese (14.9%) have decreased since 2011 (16.8%), and are lower than the national average, which is currently 19.8%. While levels of obesity in children are lower than the England average, when measured against Indices of Multiple Deprivation (IMD) data, there appears to be a correlation between deprivation and excess weight in children within the District.
- 3.7.11 Excess weight is classified in the Active People Survey as any individual reported as having a BMI of 25 or greater. Tackling obesity is a key public health priority as excess weight is associated with premature mortality and avoidable ill health.
- 3.7.12 Rates of diabetes are directly linked to obesity and tackling the condition is a key focus for the NHS both locally and nationally⁵¹. In Bromsgrove, numbers of people with a recorded diagnosis of diabetes has steadily risen since 2011, where it was below the national average at 5.0% to being the same as the current national average at 6.4%. This is almost double the England best, which is 3.3%.
- 3.7.13 While Bromsgrove is better than or similar to the national average on a range of alcohol related indicators, two indicators have shown increases that brings the District significantly above the national average⁵². Admissions for alcohol-related alcoholic liver disease in females has seen a sharp increase and episodes are reported at a rate of at 90.8 per 100,000 population compared with 65.8 per 100,000 population nationally. Admissions for alcohol-related malignant neoplasm in the District are reported to be at 205.3 per 100,000 population and are also higher than the national average at 175.8 per 100,000 population.
- 3.7.14 Falls are the largest cause of emergency hospital admissions for older people. In Bromsgrove, injuries due to falls and hip fractures are generally similar to the national average, with the exception of injuries in females aged 65+ and 80+, which are significantly worse than the national average. Falls have an impact on long term outcomes and can often trigger people moving from their own home to long-term nursing or residential care. The projected number of people admitted to hospital in Bromsgrove due to falls is set to rise from 461 in 2015 to 700 in 2030, unless preventive measures are put in place.⁵³
- 3.7.15 Bromsgrove has a higher than national average proportion of the population (12%) providing unpaid care to relatives or friends with long-term physical or mental ill health or disability for at

⁴⁹ <http://fingertips.phe.org.uk/profile/health-profiles>

⁵⁰ <https://www.sportengland.org/media/12458/active-lives-adult-may-16-17-report.pdf>

⁵¹ <http://www.redditchandbromsgroveccg.nhs.uk/news/rbccgcampaigns/diabetes/>

⁵² http://www.worcestershire.gov.uk/downloads/file/7050/2016_bromsgrove_health_and_well-being_profile

⁵³ Available at http://www.worcestershire.gov.uk/downloads/file/7050/2016_bromsgrove_health_and_well-being_profile [Accessed February 2018]

least one hour per week. Carers should be supported so they can protect their own mental and physical health and wellbeing, as well as sustain their caring responsibility.

- 3.7.16 The Worcestershire Health and Well-being Board Joint Strategic Needs Assessment Annual Summary⁵⁴ (October 2017) identified the following Priority Area Projects for Bromsgrove:
- Improve mental wellbeing;
 - Increase physical activity;
 - Reduce harm from alcohol; and
 - Ageing well.
- 3.7.17 The 2011 Census asked people in Bromsgrove to describe their health⁵⁵, which repeated a similar question from 2001 Census. Bromsgrove District continues to be generally healthier than the average across England and Wales. Furthermore, Bromsgrove District is slightly above average when compared to both national and regional figures, as shown in **Table 3.12** below.

Table 3.12 State of Health in Bromsgrove 2001-2011

State of Health	Bromsgrove 2001	Bromsgrove 2011	Worcestershire 2011	West Midlands 2011	England & Wales 2011
Very Good / Good	71.1	82.5	81.4	78.9	81.2
Fairly Good	21.2	12.7	13.5	14.4	13.2
Bad / Very Bad	7.7	4.8	5.2	6.7	5.6

Source: 2001 and 2011 Census

Deprivation

- 3.7.18 Deprivation refers to an unmet need, which is caused by a lack of resources including income, employment, health, education, skills, training, crime, access to housing and services and living environment. The deprivation in a community is measured on these different levels, with different data sets showing what could be perceived as deprivation. All these different indices are evaluated to arrive at an index of multiple deprivation (IMD) which presents an overall picture of the deprivation in a community.
- 3.7.19 According to the 2015 Indices of Multiple Deprivation, of the 30 local authority areas within the West Midlands, Bromsgrove is one of only six local authority areas that falls within the least deprived (10%) decile and is the only local authority area in the least deprived (10%) decile within Worcestershire. Bromsgrove District ranks in the bottom quarter of most deprived local authorities across England. The District is ranked 282nd out of 326 local authorities, where a rank of 1 is the most deprived in the country and a rank of 326 is the least deprived. This is an increase from the 2010 Indices, whereby Bromsgrove was positioned 280th out of 354 local authorities nationally (this

⁵⁴ Available at http://www.worcestershire.gov.uk/downloads/download/571/joint_strategic_needs_assessment_summaries [Accessed February 2018]

⁵⁵ Census 2011 Table No: KS301EW

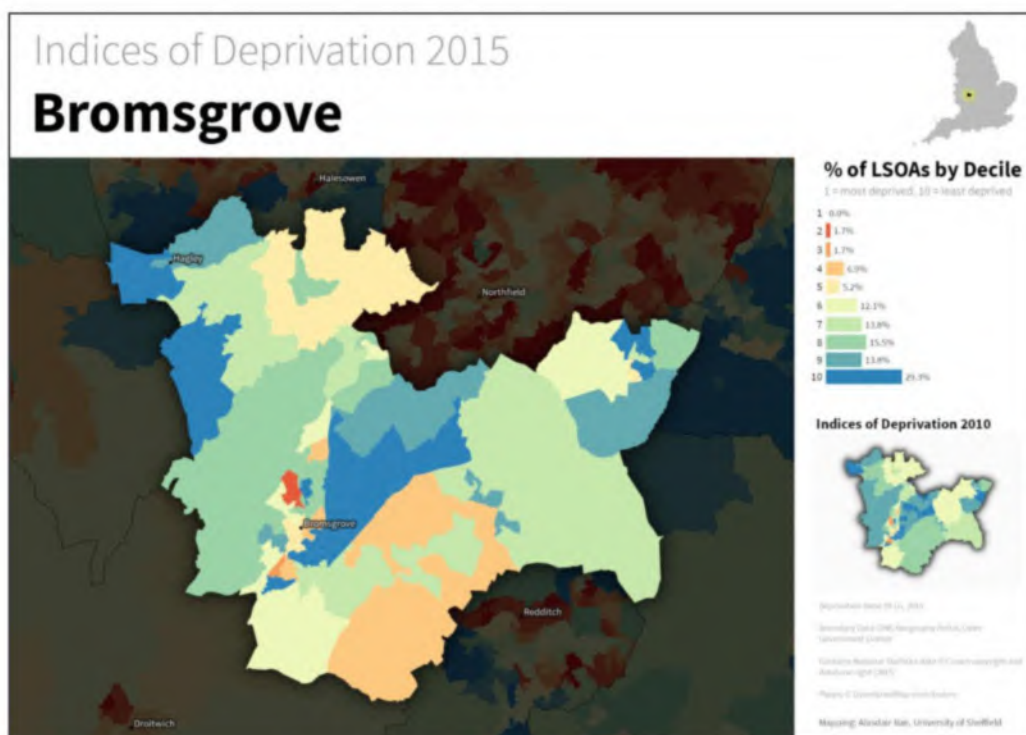
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/2011censuskeystatisticsforenglandandwales/2012-12-11#health> [Accessed February 2018]

change in the number of local authorities might be attributed to some double counting across local, county and unitary authorities previously).

3.7.20

Within the District, the IMD is ranked by Lower Layer Super Output Area (LSOA), of which there are 58 LSOAs covering the District and 32,844 nationally. Although the majority of the District performs well in terms of deprivation, there are small pockets of deprivation that need to be tackled. There is one LSOA in the 30% most deprived nationally, which is in Charford Ward (ranked 8,390th out of 32,844 LSOAs, where a rank of 1 is the most deprived in the country) and one LSOA in the 20% most deprived nationally. The most deprived area in the District is in the northern part of Sidemoor Ward, which is ranked 6,499th out of 32,844. Particular issues affecting these areas as identified through the IMD include: low incomes, high unemployment, low educational attainment and skills and poor health.

Figure 3.10 Indices of Deprivation 2015



Source: The English Indices of Deprivation 2015⁵⁶

Crime

3.7.21

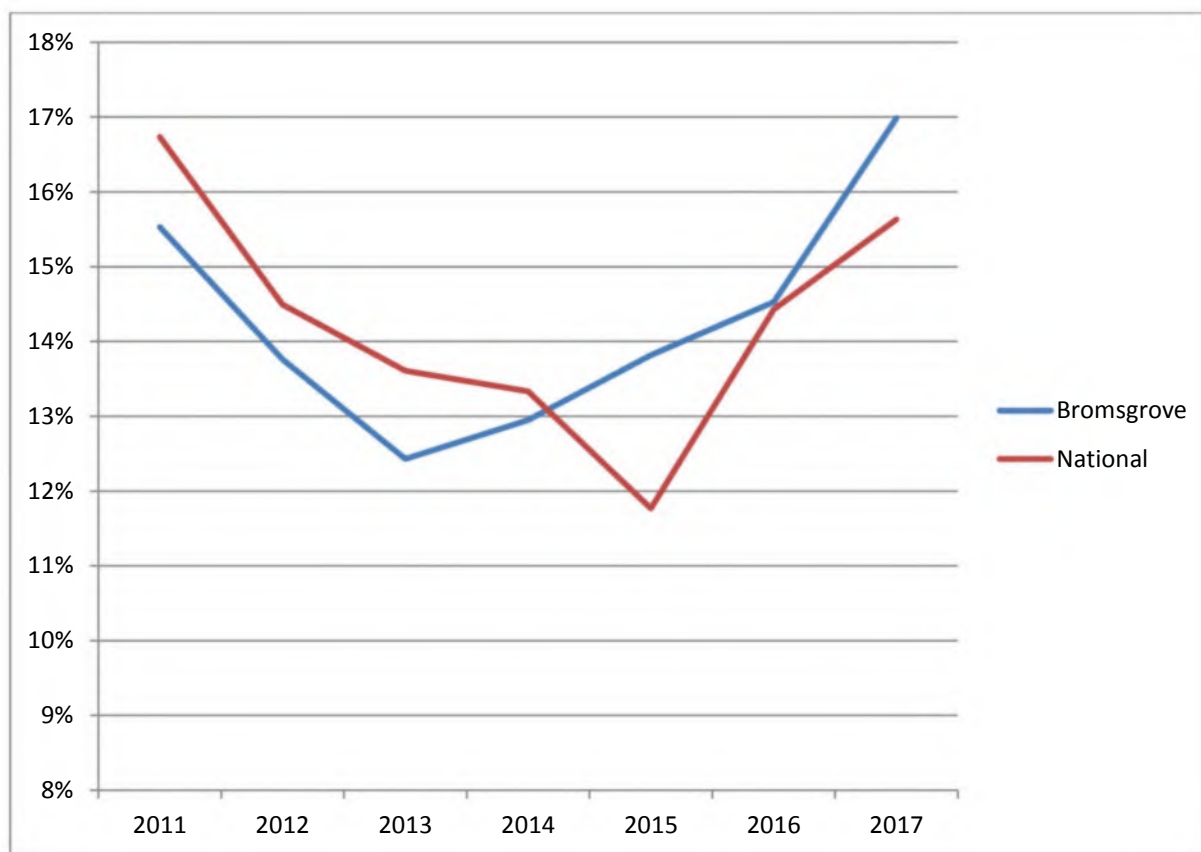
In order to put crime rates into perspective, the Crime Survey for England and Wales (CSEW) (2017) shows that many of the high-volume crimes, such as lower harm violent crime, criminal damage and most types of theft, were either estimated to be at levels similar to the previous year or to have fallen. It also shows that crime is not a common experience for most people, with 8 in 10 adults surveyed by the CSEW not being a victim of any of the crimes asked about in the survey.

3.7.22

Bromsgrove has traditionally been a safe place to live, with levels of crime being lower than the National average. However, data shows that the crime rate overall in Bromsgrove is now slightly higher than the national average, as show on **Figure 3.11** below.

⁵⁶ English indices of deprivation 2015 <http://ajrae.staff.shef.ac.uk/imd15/>

Figure 3.11 Crime Rates in Bromsgrove and Nationally



Annual data presented as a percentage of the overall total recorded crimes for the period 2011-2017⁵⁷

- 3.7.23 Fear of crime is not an issue in Bromsgrove. The Council's 2015 Viewpoint Survey revealed that 69% of residents felt very safe/fairly safe after dark in their local neighbourhood as opposed to 14% who felt very unsafe/fairly unsafe. This is an improvement from the first Viewpoint Survey (2009) which recorded levels of 56% and 25% respectively.⁵⁸
- 3.7.24 Residents were asked how much they thought certain issues were a problem in their neighbourhood. 25% of respondent thought that litter was a problem, 19% of respondent thought drug use/ dealing was a problem whilst 15% of respondent thought and groups hanging around on the streets was an issue.⁵⁹
- 3.7.25 The 2017 Health Profile Report⁶⁰ stated that the rate of violent crime⁶¹ in Bromsgrove was worse than the National average over the 2015/16 period. UK CrimeStatsData for the 2017 period (January - December) indicates that whilst violent crime still has the highest level of recorded incidents in the District, it is now slightly lower than the national average of 21.2% at 20.4%. Anti-

⁵⁷ UKCrimeStats <http://www.ukcrimestats.com/Subdivisions/DIS/2477/> http://www.ukcrimestats.com/National_Picture/ [Accessed February 2018]

⁵⁸ BDC Viewpoint Survey, May 2015

⁵⁹ BDC Viewpoint Survey, May 2015

⁶⁰ <http://fingertips.phe.org.uk/profile/health-profiles> [Accessed February 2018]

⁶¹ Violent crime includes offences against the person such as common assaults, Grievous Bodily Harm and sexual offences. <http://ukcrimestats.com/blog/faqs/> [Accessed February 2018]

social behaviour (ASB)⁶² accounts for the highest category of recorded incidents in the District at 27.2%. This is higher than the national average of 23.9%, however, ASB is not a crime but a civil offence. These statistics are illustrated on **Figures 3.12** and **3.13** below.

Figure 3.12 Crime Plus ASB Breakdown - Bromsgrove District Council

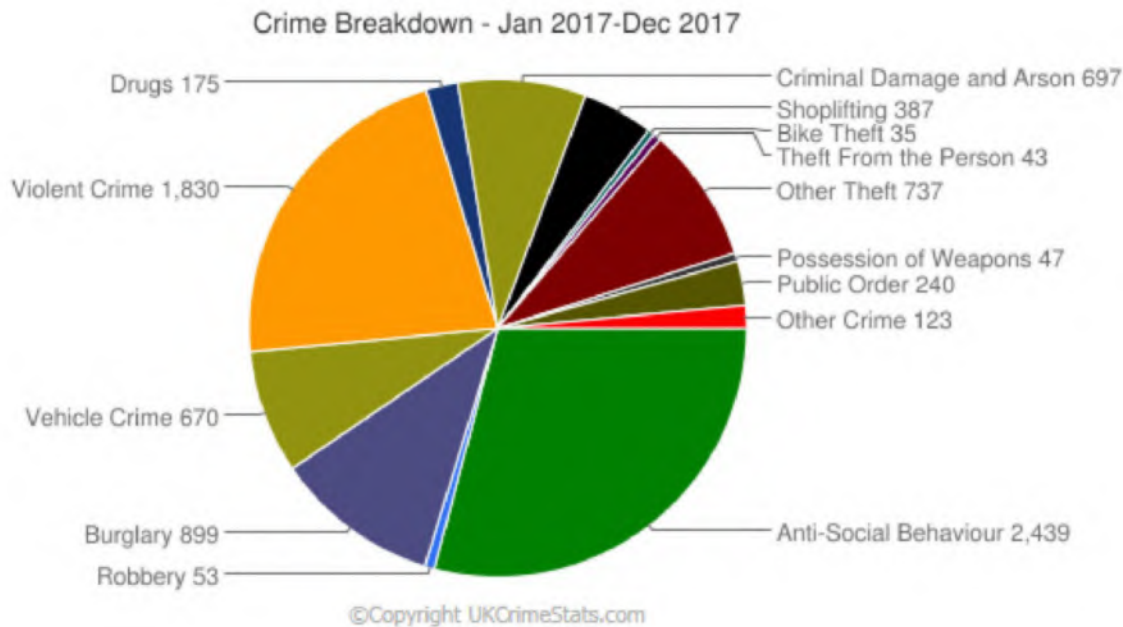
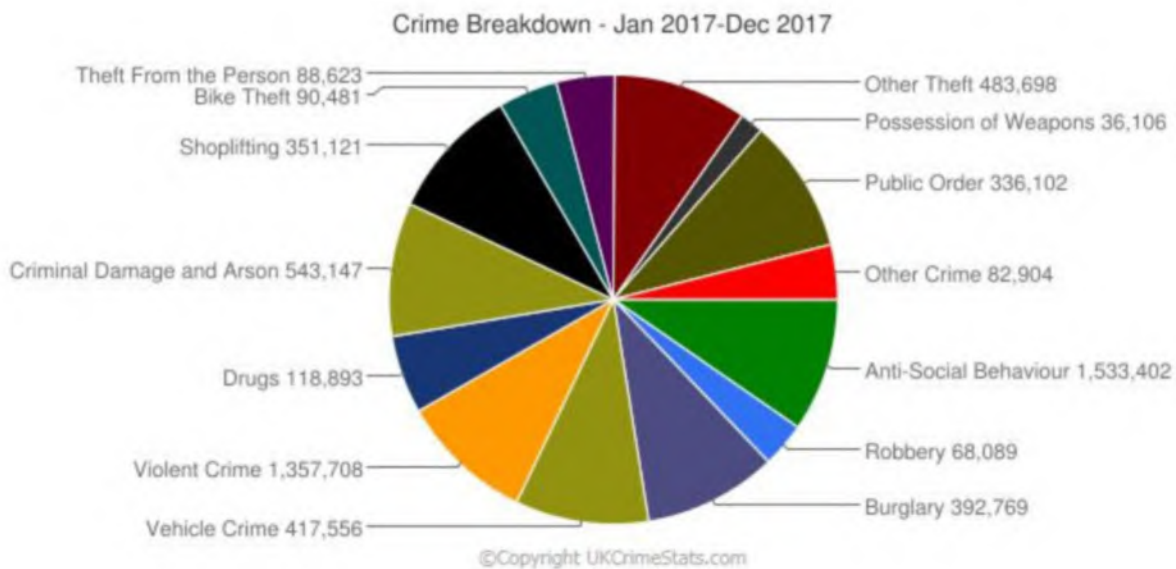


Figure 3.13 Crime Plus ASB Breakdown – National



⁶² Anti-social behaviour includes personal, environmental and nuisance anti-social behaviour.

<http://ukcrimestats.com/blog/faqs/>

Community Facilities and Services

- 3.7.26 The Council is responsible for the following key leisure and cultural services: allotments, arts development, play areas, parks, open spaces and sports pitches, sports development and sports facilities at the Bromsgrove Sport and Leisure Centre.
- 3.7.27 The District contains a number of Commons and Greens in rural areas. The commons are; Clent Common, Gannow Green Common, Hollies Hill Common, Romsley Hill Common, Sling Common, The Marlhole, Putney Lane, Romsley, Uffmoor Green Common and Walton Pool Common. A number of traditional Village Greens are also located in the District's rural areas. These are: Alvechurch Green, Belbroughton – Bradford Lane Green, Belbroughton – Holy Cross Green, Broad Green, Tardebigge, Holy Cross Village Green and Woodcote Green.
- 3.7.28 Allotments can provide a source of exercise as well as giving residents the chance to meet new friends and grow fresh produce. The District Council manages eight allotment sites of varying sizes, the biggest being at Marlbrook, which has 110 plots, and the smallest being in Aston Fields. In some rural areas allotments are also provided by Parish Councils. There are currently waiting lists on all eight Council-managed allotment sites and only Bromsgrove residents can apply.
- 3.7.29 There are three Country Parks in the District: the Clent Hills Country Park, the Waseley Hills Country Park and the Lickey Hills Country Park. These three parks form a natural boundary to the conurbation and are important for leisure and wildlife purposes. They are recognised as strategic green infrastructure assets in the Worcestershire Green Infrastructure Strategy.
- 3.7.30 There are a number of private leisure facilities throughout the District including health & fitness clubs, golf courses, indoor bowling greens, tennis courts, swimming pools and so on. The recently completed £10.3m Bromsgrove Sport and Leisure Centre (owned by the Council and run by Everyone Active), has a wide range of facilities, including two pools, a gym, climbing wall and spa.
- 3.7.31 Due to the rural nature of the District and population spread it is important that dual use/community use opportunities are maximised across the District to meet local demand and the extended schools agenda. Existing dual/community use schemes include Aston Fields Middle School, Bromsgrove School, Catshill Middle School, Hagley Catholic High School, Parkside Middle School/ Meadows First School, South Bromsgrove Community High School and Waseley Hills High School and Sixth Form Centre.
- 3.7.32 Although there is no established cinema in Bromsgrove, Artrix (the theatre) shows around two film screenings a day. Due to the dispersed population and the closeness of major cultural centres such as Birmingham, Worcester and Stratford, the potential for major cultural facilities in the District is limited, however by adopting a more focused local programme the potential of the facility will be maximised.
- 3.7.33 There are a number of shopping locations in the District catering largely for the day to day needs of residents. These shopping locations are in Alvechurch, Barnt Green, Aston Fields, Catshill, Hagley and Wythall. The main exceptions are Bromsgrove Town and Rubery. The latter, on the southern fringe of Birmingham, serves as a suburban shopping area; the former evolved as a market town serving a wide and predominantly rural hinterland although its present attractions are disadvantaged by the greater range and size of stores and facilities in neighbouring centres such as Birmingham, Worcester, Redditch, Solihull and Merry Hill.
- 3.7.34 Bromsgrove Town Centre is monitored annually via the Town Centre Health Check. This looks at the health of the Town Centre and reports on the number of vacant units, the amount of pedestrian footfall and the range of uses on offer. In terms of the range of uses on offer, the 2015/16 figures have remained fairly consistent with the 2014 ground floor use class survey, with only relatively few changes. The number of retail units (A1) has increased across the Town Centre by six units, with the

largest increase being in the Primary Shopping Zone. The number of vacant units has decreased from 42 to 35 units, representing 10.3% of all units.

3.7.35

The health of the local centres is also monitored (although less frequently) and while Catshill and Hagley have seen an increase in A1 retail uses since 2013, Alvechurch, Barnt Green, Rubery and Sidemoor have lost retail units (**Table 3.13**). The figures also show an increase in vacant units across Alvechurch, Hagley, Rubery and Sidemoor since they were last monitored in 2013 (**Table 3.14**).

Table 3.13 A1 Retail Uses in Bromsgrove

A1 Retail Uses						
	2013 No of units	2017 No of units	Change	2013 % total units	2017 % total units	% change
Alvechurch	16	13	-3	42.1%	32.5%	-9.6%
Aston Fields	14	14	0	45.2%	45.2%	0.0%
Barnt Green	28	27	-1	62.2%	57.4%	-4.8%
Catshill	7	8	1	35.0%	40.0%	5.0%
Hagley	25	27	2	55.6%	57.4%	1.8%
Rubery	61	55	-6	56.5%	50.9%	-5.6%
Sidemoor	9	7	-2	60.0%	46.7%	-13.3%
Wythall	22	22	0	62.9%	62.9%	0.0%

Table 3.14 Vacant Units in Bromsgrove

Vacant units						
	2013 No of units	2017 No of units	Change	2013 % total units	2017 % total units	% change
Alvechurch	1	4	3	2.6%	10.0%	7.4%
Aston Fields	3	2	-1	9.7%	6.5%	-3.2%
Barnt Green	1	1	0	2.2%	2.1%	-0.1%
Catshill	0	0	0	0.0%	0.0%	0.0%
Hagley	1	2	1	2.2%	4.3%	2.1%
Rubery	7	9	2	6.5%	8.3%	1.8%
Sidemoor	0	1	1	0.0%	6.7%	6.7%
Wythall	1	1	0	2.9%	2.9%	0.0%

- 3.7.36 As part of the Bromsgrove Town Centre Regeneration programme, Bromsgrove has had major investment in its health services with the opening of the new multi-million pound Town Centre Health Centre - Churchfields. In addition to Churchfields, there are 20 other GP surgeries/health centres across the District, as well as 17 pharmacies. These are generally concentrated within the District's large settlements.

Open Space

- 3.7.37 The provision of open space, sports and recreational facilities can play a significant role in the promotion of healthy lifestyles and can be a benefit to both physical and mental health as well as provide connectivity and visual attractiveness within and near to urban environments.
- 3.7.38 Access to open space is important for the health and wellbeing of individuals and communities, as well as improving the visual amenity of an area and providing habitats for wildlife and encouraging biodiversity. Open space can also improve air quality, provide air cooling, and help reduce impacts of flooding. It is an important community facility and an asset to developments.
- 3.7.39 The Council's open space standard is 3.037ha per 1000 population and is comprised of seven components as described in **Table 3.15** below⁶³.

Table 3.15 Type and Number of Open Spaces in Bromsgrove

Type of Open Space	Description	Number	Area (ha)
Parks and Gardens	Including urban parks and formal gardens for informal recreation and community events. This type of open space has multiple functions and can provide a plethora of benefits.	12	46.15
Natural and Semi Natural Open Space	Including woodlands, urban forestry, scrub, grassland, wetlands, open and running water, wildlife meadows, heathland and country parks.	15	22.70
Amenity Green Space	Including informal recreation spaces, green spaces in and around housing and greens. They are important to enhance the visual appearance of residential areas and are not laid out or managed for a specific formal function such as a park or sports pitch. Roadside verges are not included as amenity space.	32	9.70
Provision for Children	Equipped areas of play designed for play and social interaction.	32	1.90
Provision for Young People	Including multi-use games areas (MUGAS), skate parks and teen shelters.	24	0.76
Outdoor Sports Facilities	Including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other	85	156.80

⁶³ Open Space Audit 2017, Bromsgrove District Council

Type of Open Space	Description	Number	Area (ha)
	institutional playing fields where available to the general public, and other outdoor sports areas.		
Allotments	These provide opportunities for people to grow their own vegetables and other produce and stay active, adopting a healthy lifestyle and promoting social inclusion.	10	14.10

- 3.7.40 Within Bromsgrove District, there is an overall deficit of open space for the population for all typologies with the exception of Parks and Gardens and Outdoor Sports Facilities. The amount of Outdoor Sports Facilities within the District only just meets the requirement for the District's population and is distributed relatively evenly between the Parishes, while the amount of Parks and Gardens within the District is nearly twice the requirement, but concentrated in only five of the 21⁶⁴ Parishes.
- 3.7.41 Within the District, there is a lack of Provision for Young People and of Amenity Green Space. However, there are more areas for these two open space typologies within the Parishes than for all other typologies, with the exception of Outdoor Sports Facilities.
- 3.7.42 Seven of the Parishes do not have a surplus in their provision of open space for any typology. Four of which have no open space provision at all (Bentley Pauncefoot; Beoley; Cofton Hackett; and Dodford with Grafton), whilst the others have open space provision of one or two typologies which do not meet the quantity standard for the population of those Parishes (Lickey and Blackwell; Tutnall and Cobley; and Romsley).
- 3.7.43 Overall, none of the Parishes have a surplus in more than three of the open space typologies, and none of the Parishes, with the exception of Bromsgrove Town, contain all seven types of open space. The greatest deficits of open space in Bromsgrove District being within the typologies of Natural and Semi Natural Open Space and Amenity Green Space.

Likely Evolution of the Baseline without the District Plan

- 3.7.44 The population of England is predicted to rise by around 10.3 million (19%) between 2011 and 2039. Bromsgrove's predicted growth over the same period is around 15%. This is slightly lower than the predicted growth for both England and the West Midlands (16%), but higher than the predicted growth for Worcestershire as a whole (12%). The shift in trend across all age groups is consistent across all locations, however Bromsgrove's aging population (65+) is predicted to increase by 9.2% which is higher than that predicted for England (7.7%) and the West Midlands (6.9%). As **Table 3.16** shows, this is lower than the predicted aging population growth across Worcestershire as a whole (10.2%), however this can be attributed to other Districts in the County that historically have a higher proportion of aging residents.

⁶⁴ For the purpose of distribution statistics, this figure includes the non-Parished areas of Bromsgrove Town and Rubery

Table 3.16 Population Change by Age Range 2011-2039

	2011	2039	2011	2039	2011	2039	2011	2039	2011	2039	2011	2039
Age range by %	0-14		15-24		25-59		60-64		65-84		85+	
Bromsgrove	16.3	16.0	11.1	9.5	45.2	39.4	6.9	5.4	17.5	22.6	3.0	7.1
Difference	-0.3%		-1.6%		-5.8%		-1.5%		+5.1%		+4.1%	
Worcestershire	16.5	15.6	11.6	10.2	45.5	39.1	7.2	5.4	16.6	23.0	2.6	6.7
Difference	-0.9%		-1.4%		-6.4%		-1.8%		+6.4%		+3.8%	
West Midlands	18.2	17.6	13.4	12.3	45.5	41.4	6.0	4.9	14.7	19.0	2.2	4.8
Difference	-0.6%		-1.1%		-4.1%		-1.1%		+4.3%		+2.6%	
England	17.7	16.8	13.1	11.8	46.9	42.3	6.0	5.1	14.1	19.2	2.2	4.8
Difference	-0.9%		-1.3%		-4.6%		-0.9%		+5.1%		+2.6%	

- 3.7.45 The District's population will continue to increase irrespective of a District Plan being in place. Without a Plan in place it will be difficult to influence the provision of services and facilities that an increased population will need to access within the District.
- 3.7.46 The majority of the District's aging population live in the less built-up areas of the District, meaning that easy access to a wider network of services and facilities may be limited. Without a Plan in place, it will be difficult to ensure that our aging population remains an inclusive part of our District's communities.
- 3.7.47 Without an adopted District Plan in place, development growth to meet future population growth will not be planned. In consequence, benefits, such as focusing future development in sustainable locations would be dependent on applying national planning policy to individual planning applications, and inevitably would lead to development that would be more fragmented, infrastructure provision more disjointed and less able to meet the future population's needs.
- 3.7.48 In the absence of a Plan, opportunities to systematically provide for services and facilities is lost, resulting in increased deprivation and a decline in health and well-being.
- 3.7.49 Based on past trends, it is likely that numbers of people with excess weight and with a recorded diagnosis of diabetes will continue to rise. Without a District Plan it would be difficult to ensure that the district has adequate health care facilities or to restrict the quantity or location of hot food takeaways and drinking establishments.
- 3.7.50 The Indices of Deprivation map (2015) for Bromsgrove shows that some LSOAs have worsened as well as other LSOAs improving. The range of issues covered by the IMD means that a raft of strategies from a range of organisations will have an influence on the state of the District and these strategies would be implemented irrespective of a District Plan being in place. However, without specific and detailed district plan policies, the extent to which new development meets the needs of Bromsgrove's communities would be uncertain. Furthermore, the potential opportunities for new development to complement other strategies and tackle deprivation by, for example, providing affordable housing, ensuring adequate open space provision and meeting the specific need for community facilities and services may not be realised.
- 3.7.51 Policies in the plan will help promote and contribute to safety in the District by improving public realms to help reduce crime and fear of crime.

- 3.7.52 Good design principles through development is directly related to crime and will add to the general sense of place and natural surveillance of area. Designing out crime in line with the High Quality Design SPD for new developments will be delivered by incorporating measures and principles consistent with those recommended by 'Secured by Design'.
- 3.7.53 There will be an opportunity to improve connectivity and access in areas where crime is a problem through the plan review.
- 3.7.54 Bromsgrove Town Centre has seen some major improvements over recent years and this may be attributed to an increased retail offer and lower vacancy rates. Without policies encouraging the regeneration of other parts of the town centre and protecting it as the main focus for retail in the District, its vitality and viability could be compromised.
- 3.7.55 Local centres provide vital facilities and services to serve the local populations. The Local Centre monitoring shows that some of the local centres have lost some of their A1 retail uses and has shown a rise in vacancy rates. Without policies protecting the local centres, there may be further decline of these important facilities, which will have a detrimental effect on community life.
- 3.7.56 Policies in the Plan ensure that all new developments provide open space facilities, which have positive impacts on the District's health and well-being. Without this provision and improvements to it, there may be an increase in some of the negative health impacts suffered in the District such as a decline in mental wellbeing and increased levels of obesity. It would not be possible to influence the quantity, quality and accessibility of green/open spaces or to collect/secure developer contributions. There would also be less opportunity to influence the creation of attractive, safe routes to encourage walking and cycling.

Key Sustainability Issues

- The need to ensure provision of suitable and accessible health care services;
- The need to address the following Health Priority Area Projects for Bromsgrove;
- Improve mental wellbeing;
- Increase physical activity;
- Reduce harm from alcohol;
- Ageing well;
- The need to address the following Indices of Multiple Deprivation issues in the District's most deprived areas: low incomes, high unemployment, low educational attainment and skills and poor health;
- The need to create safe and secure living environments by reducing the level of crime in the District;
- The need to ensure that good design principles are implemented for new development to reduce crime and improve safety;
- The need to improve connectivity and accessibility in the District to reduce the chance of crime related incidents;
- The need to ensure appropriate services and facilities are available and accessible to meet the needs arising from new residential development, whether through new provision or expansion of existing services and facilities;
- The need to support and enhance the existing local centres; and

- The need to protect and enhance open space provision across the District.

3.8 Housing

The Character of the Housing Stock

- 3.8.1 In December 2017, the Land Registry published figures which illustrated that the average house price in England was £243,582 compared with £276,713 in Bromsgrove District. This represents a 7.8% increase in house prices in Bromsgrove since January 2017 compared with a 5.2% increase in house prices across England⁶⁵. The ratio of lower quartile house prices to lower quartile earnings is a measure of how affordable a property is to buy, where the higher the ratio, the less affordable it is for newly forming households to get onto the property ladder. The most up to date information from the ONS shows that in 2016 Bromsgrove's affordability ratio was 11.56, which was higher than Worcestershire (8.54), West Midlands (6.54) and England (7.16)⁶⁶. In consequence, affordability is a major problem across the District.
- 3.8.2 In April 2016 the number of dwellings in the District was 40,630. Of this 89.5% were privately owned. This figure is higher than both the County (84.9%) and national (82.5%) figures. At the time of the 2011 Census, the overwhelming majority of people in the District lived in households (97%) the remainder (3%) lived in communal establishments such as nursing homes and HMP Hewell. The tenure of households is dominated by the owner-occupier sector with around 40.6% of the properties in the District being owned outright and 38.9% owned with a mortgage or loan⁶⁷.
- 3.8.3 In terms of dwelling types, 37.5% of Bromsgrove households were detached, 51.1% % were semi-detached or terraced and 10.5% were flats/ maisonettes⁶⁸.
- 3.8.4 The Council's social rented housing stock has been transferred to Bromsgrove District Housing Trust, which is a Registered Social Landlord (RSL). In April 2016, 10.5% of the dwellings in the District were affordable housing stock. This is lower than both the affordable housing provision in Worcestershire (15%) and England (17.3%)⁶⁹.

Housing Need and Demand by Sector

- 3.8.5 There are currently 2,174 applicants on the Council's housing waiting list. Of these, around 300 applicants have a high housing need (Bandings: Silver to Priority), as shown in **Table 3.17** below.

⁶⁵ <http://landregistry.data.gov.uk/app/ukhpi/browse?from=2017-01-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2Fbromsgrove&to=2018-01-01>

⁶⁶ ONS Housing affordability in England and Wales: 1997 to 2016
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/1997to2016>

⁶⁷ UK Census Data <http://www.ukcensusdata.com/bromsgrove-e07000234#sthash.4XXXLpUD.dpbs>

⁶⁸ UK Census Data <http://www.ukcensusdata.com/bromsgrove-e07000234#sthash.3u9aBj0B.dpbs>

⁶⁹ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

Table 3.17 Number of Applicants on Council's Housing Waiting List by Banding, February 2018

Banding ⁷⁰	Bronze	Bronze Plus	Reduced Preference	Silver	Silver Plus	Gold	Gold Plus	Priority	Grand Total
	384	1443	31	18	11	159	116	12	2174

Source: Bromsgrove District Council, Choice Based Lettings System

- 3.8.6 This is not the only indicator of housing need, newly forming households who are unable to affordable open market have to be taken into account as well. This is a particular problem in the smaller rural settlements where property prices are generally higher, meaning that young people are often unable to find a home in the community where they grew up.
- 3.8.7 The Bromsgrove District Health Profile 2017 confirms that rate of statutory homelessness is better than average at 0.2% compared with England (0.9%) during the 2015/16 data capture period⁷¹.

Likely Evolution of the Baseline without the District Plan

- 3.8.8 Housing affordability is an issue within the District, coupled with lower than average levels of affordable housing stock. The absence of an up to date Plan would restrict the Council's capacity to negotiate appropriate levels and types of affordable housing provision in the District that would meet housing needs.

Key Sustainability Issues

- The need to continue to provide homes that are accessible to those in most acute need;
- The need to enable housing growth and plan for a mix of housing types and tenures to meet the requirements of all households; and
- The need to create places to live in sustainable locations.

3.9 Economic Activity and Education

Employment and Economic Performance

Economically Active Population

- 3.9.1 Relative to Bromsgrove's overall population of 96,800, the District has a lower proportion (60%) of people between 16-64 years of age than both regional (62.2%) and national (63.1%) levels⁷². In fact, this is the tenth lowest proportion of 16-64 year olds of the 30 local authorities within the West Midlands region⁷³.

⁷⁰ **Priority Gold Plus & Gold:** high housing need Statutory Reasonable Preference e.g. Homeless. **Silver Plus & Silver:** high housing need but no connection to Bromsgrove Statutory Reasonable Preference. **Reduced Preference:** those with a Statutory Reasonable Preference but priority reduced. **Bronze Plus:** low housing need. **Bronze:** low housing need no connection to Bromsgrove.

⁷¹ <http://fingertips.phe.org.uk/profile/health-profiles>

⁷² Local Authority Labour Market Profile – Bromsgrove District

<https://www.nomisweb.co.uk/reports/lmp/la/1946157193/report.aspx?town=bromsgrove>

⁷³ Achieving Long Term Sustainable Growth in Bromsgrove: The Challenges and Opportunities in a Time of Rapid Change (B.Nevin, 2016)

- 3.9.2 As this age range makes up the economically active portion of a population, i.e. of traditional working age, Bromsgrove's comparatively lower rate could present future challenges in respect of the available labour supply in the District, as well as issues to address concerning a larger proportion of over 64-year olds residing in the District. However, of the population within the 16-64 age bracket, 82% of people are considered economically active, which is higher than both regional (76.2%) and national (78.1%) levels.
- 3.9.3 Of the 52,700 people economically active in Bromsgrove, it is estimated that some 51,300 are in employment and 1,700 are unemployed. This unemployment rate (3.1%) for the period between October 2016 and September 2017 compares favourably to the regional and national averages for the same period of 5.4% and 4.5% respectively⁷⁴.

Employment

- 3.9.4 Whilst Bromsgrove District has never been home to a particularly high concentration of (heavy) manufacturing industries, notable losses of large industrial sites at MG Rover in Longbridge and Garringtons/UEF in Bromsgrove were indicative of the deindustrialisation that occurred across the West Midlands in the second half of the 20th century. This is now reflected in the spread of jobs that people who work in Bromsgrove District are currently employed in. The dominant employment sectors in Bromsgrove District are service related industries, which account for 26,050 (55.3%) jobs. Of this number, 10,000 (21.3% of all jobs) of these jobs are employed within the health and education sectors. This is followed by transportation and storage (9,000 jobs or 19.1%), manufacturing (3,000 jobs or 6.4%) and construction (2,250 jobs or 4.8%)⁷⁵.
- 3.9.5 Caution should be applied to use of this data though, as reporting changes between 2015 and 2016 may have had a significant effect on the total jobs within each category of employment. In particular, jobs within the transportation and storage sector are shown to increase from 2.2% of total jobs in 2015 to 19.1% of total jobs in 2016, which it is not feasible to entirely attribute to actual growth in jobs of this level to. How existing businesses are classified within the different employment sectors will explain a significant degree of this increase.
- 3.9.6 Also of note is the proportion of self-employed people living in the District, which at 13.9% of the economically active population is considerably higher than regional (9.5%) and national (10.6%) levels. The level of self-employment in the District reflects the strong growth in small and micro enterprises in Bromsgrove, in particular over the preceding twelve months. Between 2010 and 2016, 475 micro enterprises (those employing up to 10 employees) were set up in the District rising from 3,680 in 2010 to 4,155 in 2016. In 2017 alone, 2,280 micro enterprises were formed taking the District's total to 6,435. Similarly, between 2010 and 2016 the number of small enterprises (those employing between 10 and 50 employees) in the District remained fairly constant around 375-385 enterprises. However, in 2017 this increased from 385 to 660⁷⁶ as shown in **Table 3.18** below.

⁷⁴ <https://www.nomisweb.co.uk/reports/lmp/la/1946157193/printable.aspx>

⁷⁵ <https://www.nomisweb.co.uk/reports/lmp/la/1946157193/printable.aspx>

⁷⁶ https://www.nomisweb.co.uk/reports/lmp/la/1946157193/subreports/idbr_time_series/report.aspx?c1=2013265925&c2=2092957698

Table 3.18 Total Number of Enterprises in Bromsgrove District 2010-2017

SIZE OF ENTERPRISE (NO. OF EMPLOYEES)					
YEAR	MICRO (0-9)	SMALL (10-49)	MEDIUM (50-249)	LARGE (250+)	TOTAL
2010	3,680	375	50	10	4,115
2011	3,610	330	50	15	4,005
2012	3,710	350	55	15	4,130
2013	3,690	365	60	15	4,130
2014	3,805	370	60	20	4,255
2015	3,995	385	65	20	4,465
2016	4,155	385	70	20	4,630
2017	6,435	660	70	20	7,185

Job Density

- 3.9.7 Bromsgrove's jobs density, that is the ratio of total jobs (including self-employed) to the number of people aged 16-64, sits at 0.88 (51,000 jobs to 58,100 people aged 16-64) which is higher than the 0.79 West Midlands level and 0.84 national level. This implies a reasonably good level of jobs in the District however levels of out-commuting from Bromsgrove are high relative to inward-commuting. This implies that whilst the absolute level of jobs in the District is not necessarily a problem, the type and status attached to these jobs is not sufficient to attract more people, whether Bromsgrove District residents or inward commuters, to work in Bromsgrove jobs.

Commuting Patterns

- 3.9.8 Out-commuting is high at 26,108 people, compared to 18,892 inward-commuting, giving a net out-commuting level of 7,216 people⁷⁷. The principal flows are out to jobs within the local authority areas of Birmingham, Solihull, Redditch, and Dudley. As discussed with reference to jobs density, this pattern is indicative of the type of jobs available within Bromsgrove District relative to the employment demand of the District's residents; however, it also reflects the geography of Bromsgrove and its position on the edge of the West Midlands conurbation⁷⁸.

Earnings

- 3.9.9 The latest (2017) Annual Survey of Hours and Earnings (ASHE) shows that the average weekly earnings of people who work within the District are £496. This is lower than both the regional average of £515 per week and the national average of £552 per week. This contrasts with the average weekly earnings of people who live in the District, and therefore could be working within the District or commuting elsewhere to employment, which are £664. These are significantly higher than the average of £517 per week for the West Midlands and £553 per week nationwide.

⁷⁷ <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462331>

⁷⁸ For further data regarding travel to work (method used and distance travelled), please see the Infrastructure and Accessibility baseline section.

- 3.9.10 Bromsgrove has the highest resident average weekly earnings within the entire West Midlands. For similarly more prosperous Districts in the region such as Warwick and Stratford on Avon, it is perhaps notable that these areas have a higher jobs density than Bromsgrove and therefore much higher average weekly earnings for employees.

Economic Performance

- 3.9.11 Between 1998 and 2016, Bromsgrove's economic productivity measured as Gross Value Added (GVA) per head of population grew at the second highest rate of all local authorities in the West Midlands region, with only Stratford on Avon's growing at a faster rate during this period. Considering a shorter period of 10 years from 2007-2016 however, the rate of Bromsgrove's increase in GVA per head slipped to fourth highest in the region behind Stratford on Avon, North Warwickshire, and Warwick Districts⁷⁹.

Employment Land

- 3.9.12 **Table 3.19** shows the level of employment land supply in the District (at April 2017). The majority of the District's current stock of strategically significant employment land is contained on a small number of sites, in particular to the south of Bromsgrove, at Sherwood Road/Bromsgrove Enterprise Park (George Road and Isidore Road), Buntsford Park Road/Buntsford Drive, and at Harris and Saxon Business Parks. There are a couple of outlying sites at Wythall Green Business Park and the Cofton Centre as well. In addition, 5 hectares of land within the total below was allocated in the Bromsgrove District Plan as part of site BROM2 in Policy BDP5A.

Table 3.19 Bromsgrove District Employment Land Supply, April 2017

Category	Land Supply (hectares)
Sites with planning permission (including windfalls)	13.1
Outstanding capacity on previously allocated district plan sites	12.27
Newly allocated sites (BDP, Jan 2017)	5
Total Commitments/Allocations	30.37
Completions (2011 – 2017)	5.01
Total Employment Land Supply 2011-2030*	35.38

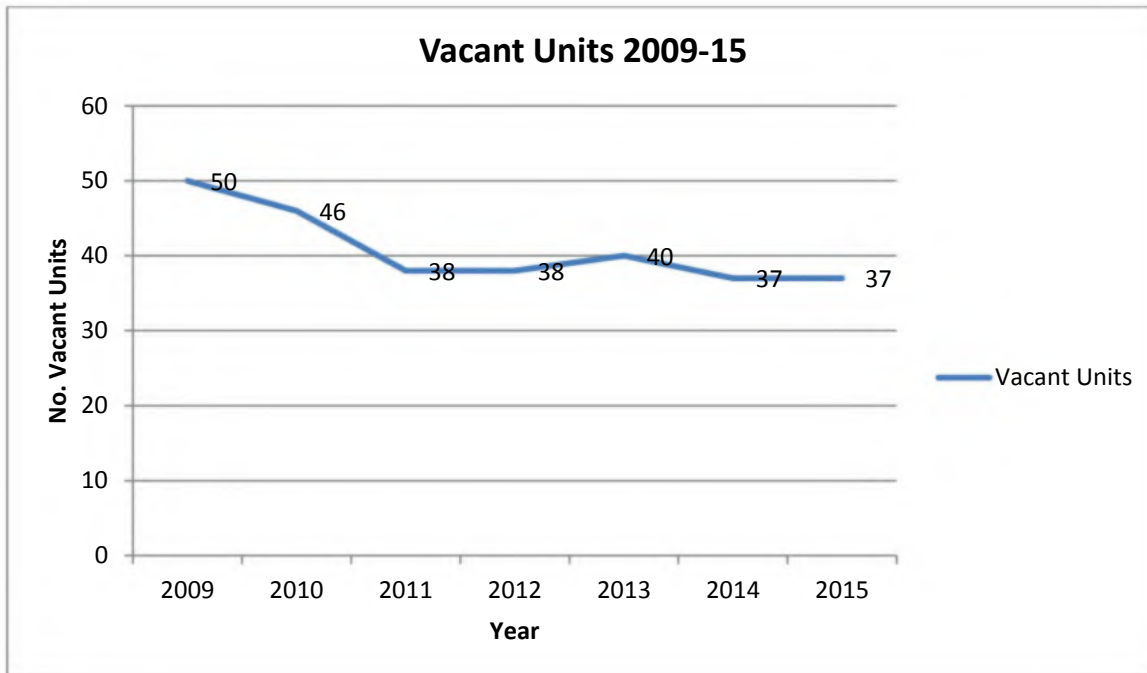
(*Excluding land allocated at Ravensbank Business Park and Longbridge)

- 3.9.13 The existing employment locations in the District are shown on **Figure 3.1** above.

Bromsgrove Town Centre

- 3.9.14 Bromsgrove Town Centre is the focus of retail activity within the District, although bordering areas with larger urban centres can often provide a much wider range of goods which means trade is lost to these neighbouring centres. Town Centre vacancy rates for recent years show an improving picture immediately following the recession in 2008 however this has plateaued in more recent years with the number of vacancies in Bromsgrove Town Centre remaining fairly constant at around 37-40 units, equating to 11-12% vacancy rate (**Figure 3.14**).

⁷⁹<https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/regionalgrossvalueaddedbalancedbylocalauthorityintheuk>

Figure 3.14 Bromsgrove Town Centre Vacant Units⁸⁰

3.9.15 In recent years, significant improvements to the quality of the environment of Bromsgrove High Street have taken place. The Town Centre now benefits from new high quality granite paving along the full length of the High Street with distinct areas for market stalls and street cafes, new benches, trees and lighting. The market was relocated back into the High Street. The first property to benefit from the Townscape Heritage Initiative (THI) was 27–29 High Street, which was completed in early 2015. Many more recent schemes are underway or have been completed in 2016 and 2017, which have been successful in securing THI funding.

3.9.16 Other major developments over the last few years in and around Bromsgrove Town Centre include a new health centre and library at Parkside, a new leisure centre replacing the old Dolphin Centre, a new police and fire station at Slideslow Drive, as well as redevelopment and expansion of Bromsgrove train station.

Skills and Education

3.9.17 Education in Bromsgrove is administered by Worcestershire County Council (WCC) as the Local Education Authority (LEA). Some parts of the District, namely Hagley, Wythall and Rubery have traditionally been part of a two-tier system of education based on 4-10 age group primary schools, and 11-18 age group secondary schools, which can be attributed to their close proximity to the West Midlands conurbation and the operation of a two-tier system there. However, in Bromsgrove town and the surrounding villages, education has traditionally been provided via a three-tier system based on 4-8 age group first schools, 9-12 age group middle schools and 13-18 age group high schools. This approach changed through the Government's introduction of the Academy Conversion programme and the Education Act 2011.

3.9.18 LEA's have a statutory duty to ensure sufficient school places in their area under section 14 of the Education Act 1996. Under the Education Act 2011 and the Academy Conversion Programme, the LEA is now a commissioner of places as opposed to a provider. The LEA works with schools to

⁸⁰ <http://www.bromsgrove.gov.uk/media/3071368/Town-Centre-Health-Check-2016.pdf>

ensure the correct balance in meeting the statutory duty placed upon it and will remain the central point of contact to ensure the delivery of school places.

- 3.9.19 There are 39 schools within the District, of which only two have academy status (St. John's CE Middle School Academy and South Bromsgrove High School). The breakdown of the 39 schools is as follows: 17 first schools, 5 middle schools, 2 high schools serving 13-18 year-olds, 9 primary schools, 4 secondary schools, serving 11-18 year olds, and 2 special schools. Some of the first and primary schools have attached LEA run nurseries.
- 3.9.20 With respect to capacities in the District's schools⁸¹, high numbers are currently being experienced at first school level. Predictions indicate that these numbers will dip in 2020 and then return to higher operating levels circa 700 against combined Published Admission Numbers (PAN) of 730 in 2021. First schools are operating above 95% capacity and, in some year groups at 96% and 97% capacity. Pupil numbers remain a challenge in the town and central area spilling out to the peripheral and outlying areas. An increase in PANs across the area in the past two years has provided an additional 10 places. However, there continues to be a significant shortage of places for pupils born in 2011/2012. The LEA is currently exploring options to ensure there are sufficient school places for this year group.
- 3.9.21 Predictions for middle school forecasts indicate that pupil numbers will continue to operate at or above 98% capacity for the foreseeable future, with a bulge year in 2019. Higher pupil numbers have already started to feed through from the first schools into the middle schools, where PAN's currently exceed those of the middle schools. Provision has been made to utilise space within existing middle schools with increased PANs over the 2016-2018 period. Future demographic trends indicate that pupil numbers fluctuate year on year but are set to remain between 660 and 690, against a current combined PAN of 680.
- 3.9.22 Transfer rates to high schools have historically been lower than at middle school to take account of a small number of pupils who transfer to a two-tier system at the end of Year 6. Current predictions indicate however, that pupil numbers are set to increase from 2021, falling away in 2022 but rising again in 2023 and remaining high for the foreseeable future. The higher middle school numbers that are set to feed through the system will absorb the operating surplus and exceed the current PANs. The two maintained high schools currently operate a combined PAN of 335.
- 3.9.23 During September 2015 to July 2016, the average overall rate of absence⁸² in schools in Bromsgrove was 3.6%. This was lower than both Worcestershire (4.35%) and England (4.6%) absence rates.
- 3.9.24 The population in Bromsgrove on average has higher levels of qualification than the regional and national averages. With respect to GCSE attainment, the average attainment 8 score across Bromsgrove District high schools is 48.8 compared to 46.4 for Worcestershire and 46.3 for England (**Table 3.20**).
- 3.9.25 Bromsgrove also exceeds national and regional averages with respect to higher qualification levels (NVQ Level 4 and above) with 43.6% compared to the regional average of 31.5% and the national average of 38.2%⁸³. This could be due to a number of factors including, low deprivation, good

⁸¹ WCC: Strategic Infrastructure and Economy

⁸² Overall rate of absence: Percentage of possible mornings or afternoons recorded as an absence from school for whatever reason, whether authorised or unauthorised, across the full academic year. <https://www.compare-school-performance.service.gov.uk/schools-by-type?step=phase®ion=885&geographic=la&phase=16to18&for=16to18&datasetFilter=final>

⁸³ <https://www.nomisweb.co.uk/reports/lmp/la/1946157193/report.aspx>

schools and also the amount of skilled people who have migrated from the conurbation to live in Bromsgrove but still work in the City.

Table 3.20 Overall school performance at end of key stage 4 (2017)

School	Progress Score and Description ⁸⁴	Attainment Score ⁸⁵	Grade 5 or above in English & Maths GCSEs ⁸⁶
Hagley Catholic High School	Average: -0.15	52.7	61%
Haybridge High School & Sixth Form	Above average: 0.31	57.3	68%
North Bromsgrove High School	Well below average: -0.62	40.7	33%
South Bromsgrove High School	Average: -0.04	48.8	50%
Waseley Hills High School	Below average: -0.48	43.3	28%
Woodrush High School	Average: -0.05	49.3	44%
Worcestershire	Average: -0.03	46.4	44.1%

Likely Evolution of the Baseline without the District Plan

- 3.9.26 Aspects of the economy where Bromsgrove District performs well, such as low unemployment rates and high levels of self-employment including strong growth in micro and small enterprise start up, may continue due to Bromsgrove's relatively prosperous and highly qualified resident population.
- 3.9.27 Although jobs density in the District is higher than the national average, it is somewhat lower than other strongly performing economies in the West Midlands, such as Warwick District. Without planning for growth in the local economy in Bromsgrove by increasing the supply of local jobs, it is likely that the jobs density level would fall further behind other economies in the region.
- 3.9.28 The level of net out-commuting from the District, and the shrinking proportion of people aged between 16 and 64 years of age, would likely be accelerated should a District Plan deliver new housing growth without planning for growth in employment land provision. This is especially the case should Bromsgrove District accommodate any amount of the unmet housing need within the Birmingham and Black Country Housing Market Area.
- 3.9.29 Available employment land supply, particularly sites large enough to attract inward investment from outside of the District and potentially accommodate larger scale employers, will diminish without new site allocations. Not only could this prevent attracting new sectors (and potentially

⁸⁴ Progress 8 score: Score shows how much progress pupils at this school made between the end of key stage 2 and the end of key stage 4, compared to pupils across England who got similar results at the end of key stage 2. A score above zero means pupils made more progress, on average, than pupils across England who got similar results at the end of key stage 2. A score below zero means pupils made less progress, on average, than pupils across England who got similar results at the end of key stage 2.

⁸⁵ Attainment 8 score: Schools get a score based on how well pupils have performed in up to 8 qualifications, which include English, maths, 3 English Baccalaureate qualifications including sciences, computer science, history, geography and languages, and 3 other additional approved qualifications.

⁸⁶ Grade 5 or above in English & maths GCSEs: Percentage of pupils who achieved grade 5 or above in the 2017 reformed English and maths GCSEs. Reformed GCSEs are graded 1 (low) to 9 (high). Grade 5 in the new grading is a similar level of achievement to a high grade C or low grade B in the old grading.

higher paid jobs) to the District with specific land requirements, a limited land supply could also increase pressure on rents on existing sites and impact on existing occupiers.

3.9.30

The need for school places will continue regardless of a Plan being in place and this is monitored and forecasted by the LEA. However, without a Plan, the location where new facilities are needed may be difficult to predict and opportunities to secure planning obligations that could contribute to the delivery of school places may not be realised.

Key Sustainability Issues

- The need to address the issue of average employee earnings for those working in the District, which are significantly lower in comparison to West Midlands and national levels;
- The need for higher paid jobs to encourage residents to live and work in the District, thereby reducing out-commuting;
- The need to address the fact that existing employment land supply is on historical sites and the stock is predominantly dated with low levels of completions in recent years;
- The need to maintain high levels of educational attainment within the District and skills in the local labour force;
- The need to consider that retention and expansion of the manufacturing sector in Bromsgrove could have knock on benefits for other industries, particularly smaller businesses; and
- The need to ensure that education facilities meet the needs of the District's population.

3.10 Transport and Accessibility

Transport Infrastructure

Road Network Capacity

3.10.1

Bromsgrove District is well served by the national road network, with two major motorways passing through the District (M42 and M5), several major A-roads (A38, A435, A441, A456 and A491) and an extensive rural road network linking the main urban areas in the District with rural villages. The strategic road network, which includes motorways across the country, is managed by Highways England whilst the local road network in Bromsgrove District, including each of the major A roads listed above, is the responsibility of the Highways Authority for the area – Worcestershire County Council.

3.10.2

Highways England's Road Investment Strategy (RIS) initiative, allocates funding for highways infrastructure schemes on the Strategic Road Network (SRN) in five year periods. Funding was allocated in RIS1 (2015-2020) for work on the M5 junction 4a-6 to upgrade to a smart motorway⁸⁷, with these works completed in 2017. Currently work is ongoing to determine which parts of the SRN will secure funding for the second road investment strategy period (RIS2), 2020-2025, including consideration of the M42 through Bromsgrove District (J1-J3).

⁸⁷ "Smart motorways increase the capacity of the road, without the expense and hassle of widening the road, by either temporarily or permanently opening the hard shoulder to traffic. The technology is controlled from a regional traffic control centre." <https://www.gov.uk/guidance/how-to-drive-on-a-smart-motorway>

- 3.10.3 In addition to Highways England's RIS schemes, Worcestershire County Council Highways Authority is currently undertaking work to provide improvements to the A38 as part of a £38 million major scheme bid. This overall scheme will use funding from a variety of sources and is intended to be delivered in five packages of works, including one to undertake work at M42 J1.

Car Ownership

- 3.10.4 Data from the 2011 Census shows that car ownership in Bromsgrove District is higher than the regional (33.8%) and national (32%) average, with 50.3% of households having two or more cars / vans. This figure is up from 46.9% since the 2001 Census and is higher than all other local authority areas in Worcestershire (with the County average being 43.1%).

Bus Services

- 3.10.5 Bromsgrove District benefits from a range of inter-urban bus services which are key to providing access to employment opportunities and key services and facilities across the region, these services include:
- 144: Birmingham to Worcester (via Bromsgrove) (max 2 per hour);
 - 145: Droitwich to Longbridge/Rubery (via Bromsgrove) (max 1 per hour);
 - 42: Kidderminster to Redditch (via Bromsgrove) (max 1 per hour);
 - 43: Bromsgrove to Redditch (max 1 per hour); and
 - 318: Bromsgrove to Stourbridge (max 1 every 2 hours).
- 3.10.6 In addition to linking settlements across the District and wider region, many of the above bus services also provide links to local train stations which provides further opportunities for accessing sustainable transport options to travel across the region and connections further afield if required.
- 3.10.7 Rural areas of the District are served by more infrequent bus services which have limited hours of operation; however, for some residents such services do provide access to key services and facilities, including the rail network. Punctuality and reliability can be an issue for inter-urban and local bus services operating within the District. Constraints on the highway network are likely to be the main cause of this. Poor punctuality and reliability negatively impacts upon passenger confidence and can lead to increasing operating and passenger costs.

Rail Services

- 3.10.8 The District is reasonably well served by the rail network, although the accessibility of Bromsgrove train station is reduced somewhat by its location approximately 1 mile from the Town Centre. Work was completed in July 2016 on the redevelopment of the new Bromsgrove train station, which included new ticket office and waiting room facilities, increased parking provision and extended platforms to enable increased passenger capacity.
- 3.10.9 The extension of the Birmingham conurbation Cross City Line later in 2018 will provide more services per hour between Bromsgrove and central Birmingham, including stations in between such as Longbridge, Selly Oak/University and Five Ways. Other rail stations that provide a service to urban centres in adjacent local authorities such as Birmingham, Kidderminster and Redditch are situated at Barnt Green, Alvechurch, Wythall and Hagley. There are direct train services between Barnt Green and Alvechurch and Barnt Green and Bromsgrove town.

Movement – Travel to Work

- 3.10.10 The method of travel to work people use shows a high dependence on the car, with 73.2% of Bromsgrove residents who are currently in employment, travelling to work by car compared to a national figure of only 57%. The Bromsgrove figure is also higher than the West Midlands regional average (65%) as well as the proportion for all local authority areas in Worcestershire (with the County average being 69.1%).
- 3.10.11 Despite the location of Bromsgrove train station, train travel as a means of commuting to work is relatively popular in Bromsgrove with 4.2% of Bromsgrove residents in employment using the train as their main method of travel to work. Whilst this is lower than the national average of 5.3%, it is higher than the West Midlands regional average of 2.5% and also higher than the Worcestershire County average of 2.3%.
- 3.10.12 Data on distance travelled to work for those people in employment who live in Bromsgrove District (**Table 3.21**) shows that Bromsgrove has a much higher rate of commuting between 10km and 30km at 34.7% of all residents in employment, compared to only 20.5% of people commuting these distances at a regional level and 21.1% at a national level.

Table 3.21 Distances Travelled to Work

	Bromsgrove District	West Midlands	England & Wales
All Residents in Employment	46,251	2,536,876	26,526,336
Distance travelled to work			
Less than 2km	5,529	413,779	4,404,107
2km to less than 5km	4,925	520,096	4,851,173
5km to less than 10km	7,325	466,944	4,595,170
10km to less than 20km	12,463	370,395	4,067,393
20km to less than 30km	3,600	148,923	1,531,161
30km to less than 40km	1,093	57,914	680,415
40km to less than 60km	706	44,849	616,333
60km and over	1,446	77,627	822,306
Work mainly at or from home	5,759	246,011	2,724,010
Other	3,405	190,338	2,234,268
Total distance (km)	615,829	29,521,907	323,401,017
Average distance (km)	16.6	14.1	15.0

Walking and Cycling

- 3.10.13 The most sustainable modes of transport are walking and cycling, although clearly these are often limited in terms of the distance a journey is required to cover. However, for shorter journeys across a settlement, between nearby settlements or to access other forms of public transport for longer

onward journeys, walking and cycling offer a practical alternative to travelling by private car. Indeed, the recent increase in the popularity of road cycling has meant an increase in some people willing to travel considerably longer distances by bicycle, such as those whose usual commute is within some of the longer distance brackets in the table above.

- 3.10.14 Travel to work data shows that 8% of Bromsgrove residents who are currently employed commute to work on foot or by bicycle⁸⁸, however this is predominantly made up of those who walk rather than cycle. This may in part be explained by a lack of infrastructure to enable this, such as dedicated cycle paths or lanes and safe cycle storage facilities.
- 3.10.15 Funding has however recently (October 2017) been secured by Worcestershire County Council from the National Productivity Investment Fund (NPIF) to implement a series of sustainable travel schemes in and around Bromsgrove, based on the 'Active Travel' aims included in the recently adopted Local Transport Plan (LTP4).

Utilities Infrastructure

- 3.10.16 In recent years, broadband accessibility has become an increasingly important infrastructure consideration for development. As well as its importance for home use, superfast broadband speeds enable more people to work from home thereby leading to knock-on benefits such as reductions in commuting and associated traffic congestion or vehicle emissions. The Superfast Worcestershire broadband project aims to bring superfast broadband to 96% of homes and business properties across the county by the end of 2019.
- 3.10.17 Unsurprisingly it is the more remote rural areas of Bromsgrove District, such as Dodford and Bournheath, around the Clent Hills, and in the east of the District in the Rowney Green and Beoley area, that have less coverage of fibre and superfast broadband than the more heavily populated parts of the District. Proposals are in place to extend coverage further in 2018 and 2019.
- 3.10.18 Other utilities provision such as gas and electricity supply, as well as water supply and drainage, are managed by regional service providers, such as Western Power and Severn Trent Water covering Bromsgrove District. There are no indications of capacity issues for the District in current provision plans. However, these bodies are important consultees where new development proposals arise, to ensure utilities infrastructure is adequately planned for and funded in the medium to long term.

Likely Evolution of the Baseline without the District Plan

- 3.10.19 Capacity of the road network may be reduced, and associated problems of traffic congestion exacerbated, if investment is not made in highways infrastructure, including potential sources of developer contributions, to support the development needs of the District Plan.
- 3.10.20 Car ownership is likely to remain relatively high due in part to the rural nature of much of the District, however the location of new development allocations may have an influence on travel to work patterns if sustainable transport options become more attractive and widespread.
- 3.10.21 Walking and cycling rates, including as a means of travel to work, could remain lower than national and regional levels without investment in sustainable travel routes and facilities. Again, the location of proposed new development offers an opportunity to influence people's journey requirements and the practicality therefore of more people walking and cycling more often.

⁸⁸ QS701EW - Method of travel to work accessed at https://www.nomisweb.co.uk/census/2011/all_tables

- 3.10.22 Rural parts of the District may remain isolated without new development increasing the viability of services reaching across the entire District, such as broadband provision or more frequent bus services.

Key Sustainability Issues

- The need to increase the capacity of the road network and address congestion hotspots;
- The need to ensure interconnection between public transport services, e.g. connections from the Town Centre to Bromsgrove train station or between rural bus routes;
- The need to address the location of key public transport nodes, e.g. Bromsgrove train station, and where development is located in relation to sustainable transport options;
- The need to encourage more walking and cycling, provision of safe and interconnected routes; and
- The need to improve coverage of broadband in rural parts of the District, enabling more access to services and potential for home working.

3.11 Key Sustainability Issues

- 3.11.1 From the analysis of the baseline presented in the preceding sections, a number of key sustainability issues affecting the District have been identified. These issues are summarised in **Table 3.22** below.

Table 3.22 Key Sustainability Issues

Topic	Key Sustainability Issues
Soils and Land Use, Water Resources and Water Quality	<ul style="list-style-type: none"> • The need to identify additional previously developed land that could be redeveloped and to encourage development on previously developed (brownfield) land. • The need to protect the best and most versatile agricultural land in the District. • The need to protect and enhance the quality of the District's water sources. • The need to promote the efficient use of water resources. • The need to ensure the timely provision of new water services infrastructure to meet demand arising from new development.
Air Quality, Waste, Pollution and Energy, Flood Risk and Climate Change	<ul style="list-style-type: none"> • The need to improve air quality, particularly in the four AQMAs. • The need to minimise waste arisings and encourage reuse and recycling. • The need to ensure that new development is adaptable to the effects of climate change; • The need to mitigate climate change, including through increased renewable energy provision. • The need to locate new development away from areas of flood risk, taking into account the effects of climate change. • The need to ensure the timely provision of flood defence/management infrastructure.
Biodiversity, Geodiversity and Green Infrastructure	<ul style="list-style-type: none"> • The need to conserve and enhance biodiversity including sites designated for their nature conservation value; • The need to maintain, restore and expand the District's priority habitats; • The need to protect and enhance sites designated for their geological interest; • The need to safeguard and enhance the green infrastructure network, helping to meet the priorities of the Worcestershire Green Infrastructure Strategy.

Topic	Key Sustainability Issues
Landscape, Townscape and the Historic Environment	<ul style="list-style-type: none"> • The need to conserve and enhance the District's landscape character. • The need to promote high quality design that respects local character. • The need to protect and enhance the District's townscapes. • The need to protect and enhance the District's cultural heritage assets and their settings. • The need to avoid harm to both designated and non-designated heritage assets, including with respect to their setting. • The need to tackle heritage at risk, particularly those assets on the heritage at risk register classed as at highest risk. • The need to recognise the contribution made by the historic environment to the character of landscapes and townscapes. • The need to make the most of the opportunities the historic environment poses to contribute to other subject areas of the local plan and quality of life.
Healthy and Inclusive Communities	<ul style="list-style-type: none"> • The need to ensure provision of suitable and accessible health care services • The need to address the following Health Priority Area Projects for Bromsgrove: Improve mental wellbeing, Increase physical activity, Reduce harm from alcohol, Ageing well • The need to address the following Indices of Multiple Deprivation issues in the District's most deprived areas: low incomes, high unemployment, low educational attainment and skills and poor health. • The need to create safe and secure living environments by reducing the level of crime in the District. • The need to ensure that good design principles are implemented for new development to reduce crime and improve safety. • The need to improve connectivity and accessibility in the District to reduce the chance of crime related incidents. • The need to ensure appropriate services and facilities are available and accessible to meet the needs arising from new residential development, whether through new provision or expansion of existing services and facilities. • The need to support and enhance the existing local centres. • The need to protect and enhance open space provision across the District.
Housing	<ul style="list-style-type: none"> • The need to continue to provide homes that are accessible to those in most acute need. • The need to enable housing growth and plan for a mix of housing types and tenures to meet the requirements of all households. • The need to create places to live in sustainable locations.
Economic Activity and Education	<ul style="list-style-type: none"> • The need to address the issue of average employee earnings for those working in the District, which are significantly lower in comparison to West Midlands and national levels. • The need for higher paid jobs to encourage residents to live and work in the District, thereby reducing out-commuting. • The need to address the fact that existing employment land supply is on historical sites and the stock is predominantly dated with low levels of completions in recent years. • The need to maintain high levels of educational attainment within the District and skills in the local labour force. • The need to consider that retention and expansion of the manufacturing sector in Bromsgrove could have knock on benefits for other industries, particularly smaller businesses. • The need to ensure that education facilities meet the needs of the District's population.
Transport and Accessibility	<ul style="list-style-type: none"> • The need to increase the capacity of the road network and address congestion hotspots, • The need to ensure interconnection between public transport services, e.g. connections from the Town Centre to Bromsgrove train station or between rural bus routes. • The need to address the location of key public transport nodes, e.g. Bromsgrove train station, and where development is located in relation to sustainable transport options.

Topic	Key Sustainability Issues
	<ul style="list-style-type: none">• The need to encourage more walking and cycling, provision of safe and interconnected routes.• The need to improve coverage of broadband in rural parts of the District, enabling more access to services and potential for home working.

4. SA Approach

4.1 Introduction

- 4.1.1 This section describes the approach to the SA. In particular, it sets out the appraisal framework (the SA Framework) and how this has been used to appraise the key components of the District Plan Review Issues and Options Document. It also documents the difficulties encountered during the appraisal process including key uncertainties and assumptions.

4.2 SA Framework

- 4.2.1 Establishing appropriate SA Objectives and guide questions is central to appraising the sustainability effects of the District Plan. Broadly, the SA Objectives define the long term aspirations for the District with regard to social, economic and environmental considerations and it is against these objectives that the performance of District Plan proposals will be appraised.
- 4.2.2 **Table 4.1** presents the SA Framework including SA Objectives and associated guide questions to be used in the appraisal of the District Plan. The SA Objectives and guide questions reflect the key messages arising from the review of plans and programmes (Section 2) and the key sustainability issues identified through the analysis of the District's socio-economic and environmental baseline conditions (Section 3). These SA Objectives also reflected the 18 SA Objectives developed and used in the SA of the Bromsgrove District Plan (adopted in January 2017). The SEA Directive topic(s) to which each of the SA Objectives relates is included in the third column. A draft SA Framework was included in the Scoping Report which was subject to scoping consultation with comments received resulting to amendments, with the final version presented in **Table 4.1**.

Table 4.1 Sustainability Appraisal Framework

SA Objectives	Guide Questions	SEA Directive Topic(s)
1. To protect and enhance the quality of water, soil and air.	<ul style="list-style-type: none"> Will it provide opportunities to improve or maintain water quality? Will it encourage sustainable and efficient management of water resources? Will it ensure that essential water infrastructure is appropriately planned and co-ordinated with all new development? Will it provide opportunities to improve and maintain soil quality? Will it improve and maintain air quality? Will it address air quality issues in the Air Quality Management Areas (AQMA) and prevent new designations of AQMA? Will it help to improve failing waterbodies through appropriate mechanisms such as SuDS and improvements to watercourses (including new watercourses, or opening up of culverted streams)? 	Air, Soil and Water.
2. To ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, maximising of previously developed land and reuse of vacant buildings where this is not	<ul style="list-style-type: none"> Will it safeguard the District's mineral resources? Will it help to protect the District's best and most versatile agricultural land from adverse developments? Will it maximise the use of Previously Developed Land? Will it reduce the amount of contaminated, derelict, degraded and under-used land? Will it encourage the reuse of existing buildings and infrastructure? 	Material Biodiversity, and Flora. Assets, Fauna

SA Objectives	Guide Questions	SEA Directive Topic(s)
detrimental to open space and biodiversity interest.	<ul style="list-style-type: none"> Will it protect the District's open spaces of recreational and amenity value? 	
3. To manage waste in accordance with the waste hierarchy: 1) Prevention 2) Preparing for reuse 3) Recycling 4) Other recovery 5) Disposal	<ul style="list-style-type: none"> Will it minimise the demand for raw materials? Will there be opportunities to increase recycling? Will it reduce the production of waste and manage waste in accordance with the waste hierarchy? Will it ensure the design and layout of new development supports sustainable waste management? 	Material Assets.
4. To ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to all sources of flooding.	<ul style="list-style-type: none"> Will it protect the floodplain from inappropriate development? Will it promote patterns of spatial development that are adaptable to and suitable for predicted changes in climate change? Will it help to minimise the risk of flooding to people and property in new and existing developments? Will it ensure that new development does not give rise to flood risk elsewhere? Will it (development) improve and/or reduce flood risk (betterment and flood risk reduction opportunities)? Will it promote sustainable drainage systems where appropriate? 	Human health and climatic factors.
5. To reduce the causes of and adapt to the impacts of climate change.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases? Will it promote patterns of spatial development that are adaptable to and suitable for predicted changes in climate? Will the plan promote measures to mitigate the causes of climate change? Will it support the delivery of renewable and low carbon energy and reduce dependency on non-renewable sources? Will it encourage opportunities for the production of renewable and low carbon energy? Will it promote greater energy efficiency? Will it encourage opportunities to achieve energy efficiency measures above the minimum building regulations standard? Will it encourage innovative and environmentally friendly technologies? Will it encourage water efficiency targets above building regulations? 	Human health, and climate factors.
6. To conserve and enhance biodiversity and geodiversity and promote improvements to the green infrastructure network.	<ul style="list-style-type: none"> Will it help to safeguard the District's biodiversity and geodiversity? Will it provide opportunities to enhance local biodiversity/geodiversity in both urban and rural areas? Will it help to achieve targets set out in the Biodiversity and Geodiversity Action Plans? Will the plan protect sites and habitats designated for nature conservation, including protected species? Will it enhance ecological connectivity and maintain and improve the green infrastructure network? Will it provide opportunities for people to access the natural environment? 	Biodiversity, fauna, and flora.
7. To conserve and enhance landscape character and townscape.	<ul style="list-style-type: none"> Will it conserve and enhance landscape character and townscape? Will it promote high quality design in context with its urban and rural landscape? 	Landscape.

SA Objectives	Guide Questions	SEA Directive Topic(s)
	<ul style="list-style-type: none"> Will it protect and improve the distinctive local character of the District? 	
8. To conserve and enhance the historic environment, cultural heritage, character and setting.	<ul style="list-style-type: none"> Will it preserve, protect and enhance conservation areas, listed buildings, archaeological remains, historic parks and gardens and their settings and other features and areas of historic and cultural value? (i.e. designated and non-designated heritage assets) Will it tackle heritage assets identified as being 'at risk'? Will it improve the quality of the built environment? Will it make the most of opportunities to proactively enhance the contribution that the historic environment makes to quality of life and other elements of the local plan? 	Cultural Heritage.
9. To improve the health and well-being of the population and reduce inequalities in health.	<ul style="list-style-type: none"> Will the plan improve access to health facilities? Will the plan help to improve quality of life for residents? Will the plan promote healthier lifestyles? Will the plan mitigate against noise pollution? Will the plan mitigate against light pollution? Will the plan seek to provide high quality well designed environments? Will it maintain and improve access to open space, leisure and recreational facilities? Will the plan promote mixed developments that encourages natural surveillance? Will it promote community safety? Will it reduce actual levels of crime and anti-social behaviour? Will it reduce the fear of crime? Will it promote design that discourages crime? 	Population and human health.
10. To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community.	<ul style="list-style-type: none"> Will the plan proposals incorporate consultation with local communities? Will the plan promote wider community engagement and civic responsibility? 	Population.
11. To provide decent affordable housing for all, of the right quality and tenure and for local needs, in a clean, safe and pleasant local environment.	<ul style="list-style-type: none"> Will the plan provide opportunities to increase affordable housing levels within urban and rural areas of the District? Will it support the provision of a range of house types, tenures and sizes to meet the needs of all part of the community? Will the plan seek to provide high quality well designed homes and residential environments? Will it provide housing in sustainable locations that allow easy access to a range of local services and facilities? Will the plan provide opportunities for the construction of sustainable homes? 	Population.
12. To improve the vitality and viability of Town Centres, other centres and communities and the quality of, and equitable access to, local services and facilities regardless of age,	<ul style="list-style-type: none"> Will plan proposals maintain and enhance the provision of local services and facilities? Will the plan contribute to rural service provision across the District? Will it enhance the viability and vitality of Bromsgrove town centre and local centres across the District? Will the plan enhance accessibility to services by public transport? 	Population.

SA Objectives	Guide Questions	SEA Directive Topic(s)
gender, ethnicity, disability, socio-economic status or educational attainment	<ul style="list-style-type: none"> Will it tackle deprivation in the most deprived areas and reduce inequalities in access to education, employment and services? 	
13. To develop a knowledge driven economy which supports the development of new technologies of high value, accompanied by supporting the infrastructure, whilst ensuring all share the benefits, whether urban and rural.	<ul style="list-style-type: none"> Will it contribute towards urban and rural regeneration? Will it promote and support the development of innovative and knowledge-based technologies of high value and low environmental impact? Will it support expansion of the manufacturing sector? Will it provide opportunities for existing and new businesses to grow and develop to enhance their competitiveness? Will it provide sufficient employment land in locations that are attractive to the market and well-served by transport and other infrastructure? Will it provide good quality, well paid employment opportunities that meet the needs of local people? 	Population.
14. To raise the skill levels and qualifications of the workforce and the quality of education for all.	<ul style="list-style-type: none"> Will it promote investment in educational establishments to meet the changing demands of the population and economy? Will it improve access to training to raise employment potential? Will it provide, support and improve access to high quality educational facilities? Will it help to raise educational attainment and skills? 	Population.
15. To increase sustainable travel choices and move towards more sustainable travel patterns.	<ul style="list-style-type: none"> Will it reduce the need to travel? Will it provide opportunities to increase sustainable modes of travel? Will it focus development in existing centres, and make use of existing infrastructure to reduce the need to travel? Will it support investment in transport infrastructure? 	Population.

4.2.3 **Table 4.2** shows the extent to which the SA Objectives encompass the range of issues identified in the SEA Directive.

Table 4.2 Coverage of the SEA Directive Topics by the SA Objectives

SEA Directive Topic	SA Objective(s)
Biodiversity	6
Population	9, 10, 11, 12, 13, 14 and 15
Human Health	4, 5 and 9
Fauna	2 and 6
Flora	2 and 6
Soil	1
Water	1
Air	1
Climatic Factors	4 and 5

SEA Directive Topic	SA Objective(s)
Material Assets*	2 and 3
Cultural Heritage including Architectural and Archaeological Heritage	8
Landscape	7

4.3 Methodology

4.3.1 Based on the contents of the District Plan Review Issues and Options document detailed in **Section 1.3**, the SA Framework has been used to appraise the following key components of the document:

- Vision and Objectives; and
- Issues and Options.

4.3.2 The Issues and Options Document presents Broad Spatial Options and includes Options for specific policies. These have been appraised and are detailed in Section 5 of this document. It is anticipated that more detail will be provided in subsequent versions of the District Plan.

Vision and Objectives

4.3.3 It is important that the Vision and Objectives of the District Plan are aligned with the SA Objectives. The Vision and Objectives contained in the District Plan Review Issues and Options document (see Section 5) have therefore been appraised for their compatibility with the objectives that comprise the SA Framework to help establish whether the proposed general approach to the District Plan Review is in accordance with the principles of sustainability. A compatibility matrix has been used to record the appraisal, similar to that shown in **Table 4.3** below.

Table 4.3 Vision and Objectives Compatibility Matrix

SA Objective	District Plan Objective			
	Vision	Objective 1	Objective 2	Objective 3...etc.
1. To ensure everyone has the opportunity to live in a decent and affordable home.	0	0	+	?
2. To improve the quality, range and accessibility of community services and facilities	+	-	+	+
3. Etc...	+	0	+	?

Key

+	Compatible	?	Uncertain
0	Neutral	-	Incompatible

Development Requirements and Broad Options for Development Distribution

- 4.3.4 The development requirements and Broad Options for Development Distribution have been appraised against each of the SA Objectives that comprise the SA Framework using an appraisal matrix.
- 4.3.5 The District Plan Review will need to test a number of Development Distribution Options before progressing with the most appropriate development strategy for the District. Once the scale of development needed and the timescale covered is determined, it is highly likely that a combination of Options will be needed. Broad Options referred to in the Issues and Options Document that have been considered in this SA are as follows:
- Option 1: Focus development on Bromsgrove town;
 - Option 2: Focus development on transport corridors and/or locations with good transport links;
 - Option 3: Focus development on the Large Settlements, as identified in the existing District Plan;
 - Option 4: Disperse development around the District, allocating some new growth to a variety of settlements to allow them to grow;
 - Option 5: Focus development on the edge of the West Midlands conurbation, along the border with Solihull/Birmingham/Dudley;
 - Option 6: Focus development on the edge of Redditch;
 - Option 7: A new settlement;
 - Option 8: Reconsideration of existing unconsented allocations on the boundary with Redditch Borough; and
 - Option 9: Urban intensification.
- 4.3.6 Section 5.4 of this Report discusses the Options in more detail. Each of the Broad Options has been appraised using the appraisal matrix, which includes:
- The SA Objectives;
 - A score indicating the nature of the effect for each option on each SA Objective;
 - A commentary on significant effects (including consideration of the cumulative, synergistic and secondary effects as well as the geography, duration, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
 - Recommendations, including any mitigation or enhancements measures.
- 4.3.7 The format of the matrix used in the appraisal is shown in **Table 4.4** below. A qualitative scoring system has been adopted which is set out in **Table 4.5** and to guide the appraisal, specific definitions have been developed for what constitutes a significant effect, a minor effect or a neutral effect for each of the 15 SA Objectives; these can be found in **Appendix E**.

Table 4.4 Appraisal Matrix format – Broad Options for Development Distribution

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

Table 4.5 Proposed Scoring System

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

Policies

- 4.3.8 The Issues and Options Document includes a range of policy topics (as outlined in Section 1.3 of this report) and discusses the merits and demerits of retaining existing policies from the Adopted District Plan in relation to the natural environment, historic environment, climate change and water. The Preferred Options stage will contain policies and site allocations so these will be appraised as part of the next iteration of the plan.
- 4.3.9 The plan policies (including strategic and detailed development management policies) will be appraised using the SA Framework. The appraisal will be undertaken by plan chapter/section with a score awarded for each constituent policy and for the cumulative effects of all policies contained in each respective chapter/section. Commentary will be provided including any mitigation or enhancements measures to enhance the performance of the policies (for example, amendments to policy wording). The definitions of significance outlined in **Appendix E** will be used to guide the assessment.
- 4.3.10 The findings of the appraisal will be presented in a matrix similar to that shown in **Table 4.6** below and will use the same scoring mechanism as that presented in **Table 4.5** above. It should be noted that this table will be used to appraise future versions of the District Plan. A version of this matrix has been used to appraise policy options where they are presented in the Issues and Options Document. The column relating to cumulative effects has been omitted as it is too early in the process to consider such effects.

Table 4.6 Proposed Appraisal Matrix - Policies

SA Objective		Policy				Cumulative effect of the draft policies	Commentary on effects of each policy
		Policy H1	Policy H2	Policy H3	Etc		
To ensure everyone has the opportunity to live in a decent and affordable home	Short Term	++	++	++	0	++	<p>Likely Significant Effects</p> <p>A description of the likely significant effects of the policies on the SA Objective will be provided here, drawing on baseline information as appropriate.</p> <p>Mitigation</p> <p>Mitigation and enhancement measures will be outlined here.</p>
	Medium Term	++	++	++	0	++	<p>Assumptions</p> <p>Any assumptions made in undertaking the appraisal will be listed here.</p> <p>Uncertainties</p> <p>Any uncertainties encountered during the appraisal will be listed here.</p>

SA Objective	Policy				Cumulative effect of the draft policies	Commentary on effects of each policy
	Policy H1	Policy H2	Policy H3	Etc		
	Long Term	++	++	++	0	++

Sites

4.3.11 The potential site allocations necessary to deliver that strategy will be outlined in the Preferred Options Draft Plan and all reasonable alternatives will be appraised as part of the SA process. The Council are issuing a call for sites at a later date following analysis of responses received to the Issues and Options consultation to help inform allocations in the new District Plan. The next iteration of the SA for the Preferred Options will draw upon and complement this wider site assessment work (including assessments in respect of employment land and other land uses where available) in order to ensure that the SA is fully embedded in the site selection process.

4.3.12 In order to identify land for development, the Council will need to consider a large variety of sites for potential allocation. It will be necessary to rigorously scrutinise these sites to ensure the most suitable, sustainable and deliverable sites are taken forward through the Plan Review process. As it is a given that land will need to be released from the Green Belt, the review of the existing Green Belt against the five purposes will form one element of the assessment of land for allocation. Other assessments will include:

- Flood risk;
- Historic or Environmental designations;
- Sustainability – distance to local facilities and public transport links;
- Highways – ability to access existing highway network/serve new growth; and
- Deliverability – whether there is a reasonable prospect the site could come forward for development in the desired timeframe, considering availability and achievability.

4.3.13 Where sites are screened at the Preferred Options stage, the reasons for discounting them will be recorded in the SA Reports as appropriate.

4.3.14 Following the application of the screening criteria, residual sites will be subject to appraisal against the SA Objectives. To ensure a consistent and efficient approach to the appraisal of sites, the appraisal of sites against the SA Objectives will be largely undertaken using GIS-based criteria with associated thresholds of significance, as detailed in the site appraisal criteria provided in **Table 4.7**. The criteria used in the appraisal of sites will be clearly linked to the SA Objectives and the full criteria will be documented in subsequent SA reports. The findings of the site appraisals will be

presented as an appendix to the main SA Reports with a summary of the findings provided in the main body of text.

Table 4.7 Proposed Site Appraisal Criteria – Housing and Employment

SA Objective	Appraisal Criteria	Basis for Appraising Sites	Score
1. To protect and enhance the quality of water, soil and air.	Air quality Note that soils are referenced under SA Objective 2 and water is considered under objectives 4 and 5.	Not used for sites (evaluation of any effects requires a level of detail absent at this stage of site appraisal and assessment).	++
		Not used for sites (evaluation of any effects requires a level of detail absent at this stage of site appraisal and assessment).	+
		No likely effect.	0
		Site is within 500m of an Air Quality Management Area.	-
		Site is within an Air Quality Management Area.	--
2. To ensure efficient use of land through safeguarding of mineral resources, the best and most versatile agricultural land, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	Development in Minerals Safeguarding Areas. Development of brownfield / greenfield/ mixed land Development of agricultural land including best and most versatile agricultural land (Agricultural Land Classification (ALC) grades 1, 2 and 3a)).	Previously developed (brownfield) land, 1ha or over.	++
		Previously developed (brownfield) land. Under 1ha.	+
		Outside a Minerals Safeguarding Area.	0
		Mixed greenfield/brownfield land.	+/-
		Greenfield (not in ALC Grades 1, 2 or 3a).	-
		Greenfield (in ALC Grade 1, 2 or 3a) and/or within a Minerals Safeguarding Area.	--
		ALC Grade 3 and not known if Grade 3a or 3b.	?
3. To manage waste in accordance with the waste hierarchy: 1) Prevention 2) Preparing for reuse 3) Recycling 4) Other recovery 5) Disposal	It has not been possible to identify specific site level criteria for this SA Objective.	Considered to be neutral across projects as all projects could contribute to this objective to some degree. Household waste would be managed in accordance with the established kerb side collection system.	0
4. To ensure inappropriate development does not occur in high risk flood prone areas and does not adversely contribute to fluvial flood risk or contribute to surface water flooding in all other areas.	Presence of Environment Agency Flood Zones (rivers and surface water).	Site is wholly within Flood Zone 1 and at low risk of surface water flooding.	++
		Majority of site is within Flood Zone 1 with remainder in Zone 2 and at low risk of surface water flooding.	+
		Not used.	0
		Majority of site is within Flood Zone 2 with remainder in Flood Zone 1 and/or - site is at medium risk of surface water flooding.	-
		Within Flood Zone 3a/b and/or at high risk of surface water flooding.	--

SA Objective	Appraisal Criteria	Basis for Appraising Sites	Score
5. To reduce the causes of and adapt to the impacts of climate change.	It has not been possible to identify specific site level criteria for this SA Objective.	Considered to be neutral across projects as all projects could contribute to this objective to some degree.	0
6. To conserve and enhance biodiversity and geodiversity and promote improvements to the green infrastructure network.	Proximity to: -statutory international/national nature conservation designations (SAC, SPA, Ramasar, National Nature Reserve, Ancient Woodland, SSSIs); -local nature conservation designations (Local Nature Reserve, Local Wildlife Site) -Regionally Important Geological Site (RIGS)	Not used for sites (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	++
		Not used for sites (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	+
		No designations affecting site.	0
		Site is within 100m of a locally designated site.	-
		Within 500m of a nationally/internationally designated site.	--
7. To conserve and enhance landscape character and townscape.	Effects on landscape and townscape character.	Not used for sites (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	++
		Not used for sites (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	+
		Development is unlikely to have an effect on landscape character/townscape character and/or designated landscape.	0
		Development could have an adverse effect on landscape character and/or designated landscapes.	-
		Not used for sites (evaluation of any significant negative effects requires a level of detail absent at this stage of site appraisal and assessment).	--
8. To conserve and enhance the historic environment, cultural heritage, character and setting.	Effects on designated heritage assets.	Not used for sites (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	++
		Not used for sites (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	+
		Site is unlikely to affect heritage assets or their settings.	0
		Site could adversely affect the setting of a heritage feature of local / regional importance (including Conservation Areas).	-
		Site includes a heritage feature of national or regional importance.	--
9. To improve the health and well-being of the population and reduce inequalities in health.	Access to: -GP surgeries -open space (including sports and recreational facilities)	Within 800m of a GP surgery and leisure centre / recreational open space or the site is of a size that could support a health facility or recreational open space that could meet wider needs.	++
		Within 800m of a GP surgery or leisure centre / recreational open space.	+

SA Objective	Appraisal Criteria	Basis for Appraising Sites	Score
		Between 800m and 2,000m of a GP surgery or open space.	0
		In excess of 2,000m and less than 5,000m from a GP surgery and/or open space.	-
		5,000m or greater from a GP surgery and/or open space.	--
10. To provide opportunities for communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community.	It has not been possible to identify specific site level criteria for this SA Objective.	All sites could potentially contribute to this objective, e.g. through participating in consultation events associated with planning applications or financial contributions towards the provision of new facilities.	0
11. To provide decent affordable housing for all, of the right quality and tenure and for local needs, in a clean, safe and pleasant local environment.	Number of (net) new dwellings proposed/loss of dwellings.	100+ dwellings (or 3+ pitches for Gypsies and Travellers).	++
		1 to 99 dwellings (or 1 to 2 pitches for Gypsies and Travellers).	+
		No housing provided, e.g. a housing led scheme.	0
		Not used on the basis that the plan will lead to an overall increase in housing.	-
		Not used on the basis that the plan will lead to an overall increase in housing.	--
12. To improve the vitality and viability of Town Centres, other centres and communities and the quality of, and equitable access to, local services and facilities regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	Walking distance to key services (note GP/Health considered under SA Objective 9 and schools are considered under SA Objective 14: -Post Office - Local centre -Supermarket - Proximity to town centre.	Within 800m walking distance of all services and/or a town centre.	++
		Within 800m of one or more key services and/or within 2,000m of all services/a town centre and/or site is of sufficient size to support a facility, e.g. a new local centre.	+
		Between 800m and 2,000m of a key service.	0
		In excess of 2,000m but within 5,000m from all services/a town centre.	-
		5,000m or greater from all services/town centre.	--
13. To develop a knowledge driven economy which supports the development of new technologies of high value, accompanied by supporting the infrastructure, whilst ensuring all share the benefits, whether urban and rural.	Net employment land provision/loss.	Net provision of 1ha+ of employment land.	++
		Net provision of 0.1ha to 0.99 ha of land.	+
		No net loss of employment land.	0
		Net loss of 0.1ha to 0.99ha of employment land.	-
		Net loss of 1+ha of employment land.	--
14. To raise the skill levels and qualifications of the workforce and the quality of education for all.	Access to: -primary/first/middle schools -secondary schools/further	Within 800m walking distance of all educational facilities or site is of sufficient size to support a new facility that help meets the criteria.	++
		Within 800m of a primary/first school and 2,000m from a secondary school or site	+

SA Objective	Appraisal Criteria	Basis for Appraising Sites	Score
	education/training establishments	provides a facility that meets one of the criteria.	
		Between 800m and 2,000m of a primary/first school.	0
		In excess of 2,000m but less than 5,000m from all educational facilities.	-
		5,000m or greater from all educational facilities.	--
15. To increase sustainable travel choices and move towards more sustainable travel patterns.	Proximity to: -bus stops -railway stations	Within 400m walking distance of a bus stop and 800m of railway station or site could support a new transport hub, e.g. park and ride or rail station.	++
		Within 400m of bus stop or 800m of railway station.	+
		Between 400m and 800m of bus stop or between 800m and 2,000m from a railway station.	0
		800m or greater from bus stops or 2,000m or greater from a railway station.	-

Cumulative, Synergistic and Secondary Effects

4.3.15 The SEA Directive and SEA Regulations require that the cumulative, synergistic and secondary effects of the Draft District Plan are assessed. In particular, it is important to consider the combined sustainability effects of the policies and proposals of the Draft District Plan both alone and in combination with other plans and programmes. Government SEA guidance⁸⁹ describes these as follows:

- Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.
- Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Synergistic effects often happen as habitats, resources or human communities get close to capacity. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- Secondary or indirect effects are effects that are not a direct result of the plan but occur away from the original effect or as a result of a complex pathway. Examples of secondary effects are a development that changes a water table and thus affects the ecology of a nearby wetland; and construction of one project that facilitates or attracts other developments.

4.3.16 As this is the appraisal of the Issues and Options Document it does not contain any preferred policies or sites – these will be included in Preferred Options Plan which is the next iteration. Appraisal of the District Plan policies will be undertaken by chapter/subsection in order to

⁸⁹ Office of the Deputy Prime Minister (2005), The Practical Guide to Strategic Environmental Assessment Directive <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

determine the cumulative effects of each policy area/topic. In addition, a cumulative effects assessment will be undertaken in order to identify the interaction between policies and the interaction between potential sites. Additional commentary will also be provided with respect to where the policies and proposals of the Draft District Plan which may have effects in-combination with other plans and programmes.

4.4 When the SA was Undertaken and by Whom

4.4.1 This SA of the Issues and Options Document was undertaken by Wood in Summer 2018.

4.5 Difficulties Encountered in Undertaking the Appraisal

4.5.1 The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. These uncertainties and assumptions are detailed in the appraisal matrices.

4.5.2 The District Plan is at an early stage in its development and the appraisal of the broad Options for development was particularly difficult because of the broad scope of the Options and uncertainties around the distribution of development under each option. These uncertainties made it difficult to comment, on a consistent, basis, on the potential significant effects (positive and negative) that an option might have. Potential effects are partly based on the location and scale of development and detail on both is necessarily limited at this stage. Consequently, many of the appraisals are accompanied by a question mark indicating uncertainty over the precise effects of the Options.

4.5.3 Additional information on difficulties and assumptions will be provided in future iterations of the SA Report.

5. Appraisal of the Issues and Options Document

5.1 Introduction

- 5.1.1 This section presents the findings of the appraisal of the Issues and Options Document for Consultation. It assesses the compatibility of the District Plan Vision and Objectives with the SA Objectives (**Section 5.2**) before summarising the appraisals of the Issues and Options (**Section 5.3 to 5.13**). Recommendations arising from the SA are summarised in **Section 5.14**. **Section 5.15** discusses cumulative, synergistic and secondary effects.

5.2 District Plan Vision and Objectives

- 5.2.1 The Vision for Bromsgrove contained in the Issues and Options Document is reproduced in **Box 5.1** below.

Box 5.1: District Plan Vision

By the end of the plan period Bromsgrove District and its communities will have become more sustainable, prosperous, safe, healthy 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 natural environment, built form and settlements will continue to be preserved and enhanced.

- 5.2.2 A set of Strategic Objectives has been defined that aims to deliver the Plan's Vision, as detailed above. They build upon national policy and address key local challenges. The Strategic Objectives provide the basis for developing the spatial strategy and policies for the District, which are necessary to secure the delivery of the Vision.
- 5.2.3 The proposed Strategic Objectives are outlined below:
- **SO1** Encourage the continued regeneration of Bromsgrove Town Centre to create a thriving, accessible and vibrant centre providing facilities to meet the needs of Bromsgrove District's residents.
 - **SO2** Focus new development in sustainable locations in the District.
 - **SO3** Support the vitality and viability of local centres and villages across the District.
 - **SO4** Provide a range of housing types and tenures to meet the needs of the local population, including the special needs of the elderly and the provision of affordable housing.
 - **SO5** Provide support, encouragement and connectivity for economic growth of existing and new businesses, whilst also supporting farming and rural diversification and investing in lifelong education and learning skills.
 - **SO6** Encourage more sustainable modes of travel and a modal shift in transport, for example, encouraging walking and cycling and promoting a more integrated, sustainable and reliable public transport network across the District.
 - **SO7** Improve quality of life, sense of well-being, reduce fear of crime, promote community safety and enable active, healthy lifestyles, for example, by providing safe and accessible services and facilities to meet the needs of Bromsgrove District's residents.

- **SO8** Protect and enhance the unique character, quality and appearance of the historic and natural environment, biodiversity and Green Infrastructure throughout the District.
- **SO9** Safeguard and enhance the District's natural resources such as soil, water and air quality; minimise waste and increase recycling including re-use of land, buildings and building materials.
- **SO10** Ensure the District is equipped to mitigate and adapt to the impacts of climate change, for example, by managing and reducing flood risk, by ensuring water and energy efficiency and by encouraging new developments to be low or zero carbon.
- **SO11** Promote high quality design of new developments and use of sustainable building materials and techniques.
- **SO12** Foster local community pride, cohesion and involvement in the plan making process.

5.2.4 A matrix has been completed to assess the compatibility of the Vision and Objectives contained in the Issues and Options Document against the SA Objectives. **Table 5.1** presents the results of this compatibility assessment.

Vision

- 5.2.5 The Vision for the District seeks to deliver sustainable and prosperous, safe and healthy communities, whilst also looking to preserve the attractiveness of the district. The Vision is compatible with a number of the SA Objectives as it will help to foster community participation (SA Objective 10) in the District, deliver new housing (SA Objective 11), ensure a vibrant town centre (SA Objective 12), support the economy (SA Objective 13) and support education (SA Objective 14).
- 5.2.6 There is the potential for conflicts particularly between those elements of the Vision that support economic growth and social transformation and SA Objectives concerning flood risk, environmental protection and enhancement (and vice-versa), although the extent of any conflict is likely to depend on how the Vision is realised through the objectives, policies and proposals. In consequence, where the relationship between the Vision and SA Objectives relating to flood risk (SA Objective 4), biodiversity (SA Objective 6), cultural heritage (SA Objective 8) and landscape (SA Objective 7) has been assessed as being compatible, a degree of uncertainty has been identified.
- 5.2.7 Incompatibilities have been identified between the Vision and waste (SA Objective 3). This reflects the anticipated increase in the generation of waste during the construction and operation of new development in the District, although it is recognised that this would be mitigated to an extent by the requirement to manage waste in accordance with the waste hierarchy.
- 5.2.8 The potential for both compatibilities and incompatibilities has been identified in respect of those SA Objectives relating to water, soil and air quality (SA Objective 1), land use (SA Objective 2), climate change (SA Objective 5), and health and wellbeing (SA Objective 9). This reflects the fact that, whilst the Vision for the District seeks to preserve and enhance the attractiveness of the District in terms of its natural environment, growth will inevitably lead to an increase in land take, resource use and emissions to air. The Vision has also been assessed as having both a compatible and incompatible relationship with transport (SA Objective 15) as whilst it supports sustainable and prosperous communities (which may help to reduce out commuting and promote the use of public transport), as well as reducing the need to travel, growth will inevitably lead to an increase in vehicle movements.
- 5.2.9 Overall, the Vision leaves room for a number of uncertainties as potential conflicts could arise between growth, resource use and environmental factors. The effects are highly dependent on whether growth can be achieved through balancing economic, social and environmental

sustainability factors. The uncertainties and conflicts identified are common to this exercise and no changes to the Vision are suggested as a result of this appraisal.

Objectives

- 5.2.10 The Issues and Options Document objectives are broad ranging, spanning key socio-economic and environmental themes. As a result, none of the Issues and Options Document objectives have been assessed as being incompatible with all of the SA Objectives whilst compatibilities have been identified with each SA Objective.
- 5.2.11 As shown in **Table 5.1**, those SA Objectives that are particularly well supported by the Issues and Options Document objectives include SA Objective 2 (land use), community participation (SA Objective 10), town centre vitality (SA Objective 12), and economy (SA Objective 13). This broadly reflects the emphasis of the Issues and Options Document objectives on the delivery of sustainable growth to meet local needs, whilst also protecting and enhancing the environment.
- 5.2.12 The Issues and Options Document objectives that focus development in sustainable locations (SO2), support the protection and enhancement of the District's natural and historic environment (SO8), climate change mitigation and adaptation (SO10) and high quality design (SO11), meanwhile, have been assessed as being compatible with a range of SA Objectives, for example they all support SA Objective 2 (Land use) and SA Objective 7 (Landscape), whilst supporting a range of other SA Objectives in their own right.
- 5.2.13 The assessment presented in **Table 5.1** does highlight that in some instances incompatibilities may exist between the two sets of objectives, although this is not certain. Where potential incompatibilities have been identified, this primarily relates to, on the one hand, the aspiration for growth to meet local needs and deliver economic prosperity, and on the other, the need to protect and enhance the District's environmental assets and minimise resource use, waste and greenhouse gas emissions. In this respect, the Issues and Options Document objectives 'Town Centre Regeneration' (SO1), 'Housing' (SO4), and 'Economic Growth' (SO5) could have adverse impacts on biodiversity (SA Objective 6), landscape (SA Objective 7), and cultural heritage (SA Objective 8) and will lead to increased resource use (including land and water), waste generation and emissions associated with new housing and economic development.
- 5.2.14 Conversely, those Issues and Options Document objectives that seek to protect and enhance the District's environmental assets (SO8) and address climate change (SO10) could restrict new economic and residential development resulting in incompatibilities in respect SA Objective 11 (housing) and SA Objective 13 (economy) in particular.
- 5.2.15 The potential for both compatibilities and incompatibilities has been identified in respect of those SA Objectives relating to (in particular) air quality (SA Objective 1), climate change (SA Objective 5), health and wellbeing (SA Objective 9), and transport (SA Objective 15). This reflects the fact that, whilst new development (associated with SO3 'Local Centres,' SO4 'Housing' and SO5 'Economic Growth' could help to reduce the need to travel by car and associated emissions to air (through, for example, the provision of locally accessible community facilities and services and employment opportunities), development will inevitably lead to an increase in vehicle movements and emissions during both construction and operation.
- 5.2.16 Where the assessment has identified uncertainties in the relationship between the Issues and Options Document objectives and SA Objectives, this reflects uncertainties about the scale, type and location of development that could come forward as a result of the implementation of the District Plan.
- 5.2.17 Where more than one symbol/colour is presented in a box in **Table 5.1** it indicates that the appraisal has identified both compatibilities and incompatibilities between the Vision/Spatial

Principles and the SA Objectives. Where a box is coloured but also contains a '?', this indicates a degree of uncertainty regarding the relationship between the Vision/Strategic Objectives and the SA Objectives although a professional judgement is expressed in the colour used.

- 5.2.18 The results of the exercise do not suggest that any of the proposed Strategic Objectives require amendment.

Key to Table 5.1

+	Compatible	?	Uncertain	0	Neutral	-	Incompatible
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Table 5.1 Compatibility Matrix

SA Objective SA Objective	District Plan Vision and Strategic Objectives												
	Vision	SO1 – Regeneration of Bromsgrove Town Centre	SO2 – Focus Development in Sustainable Locations	SO3 – Vitality and Viability of Local Centres	SO4 – Housing Types and Tenures	SO5 – Economic Growth	SO6 – Sustainable Modes of Travel and Modal Shift	SO7 – Improving Quality of Life	SO8 – Protection of historic and natural environment	SO9 – Safeguard and Enhance Districts Natural Resources	SO10 – Mitigating and Adapting to Impacts of Climate Change	SO11 – High Quality Design of New Developments	SO12 – Community Pride
1. Water, Soil and Air Quality.	+/-	0	+	+/-	+/-	+/-	0	0	+	+	+	0	0
2. Land Use.	+/-	+	+	+	0	+	0	0	+	+	0	+	0
3. Waste:	-	+	+	+	0	0	+	0	0	+	0	+	0
4. Flood Risk:	+/?	+	+	+	0	0/?	0	0	0	0	+	0	0
5. Climate Change:	+/-	+/?	+	+/-	+/-	+/-	+	0	0	0	+	+	0
6. Biodiversity.	+/?	?	+	0	?	?	0	0	+	+	+	0	0

SA Objective SA Objective	District Plan Vision and Strategic Objectives												
	Vision	SO1 – Regeneration of Bromsgrove Town Centre	SO2 – Focus Development in Sustainable Locations	SO3 – Vitality and Viability of Local Centres	SO4 – Housing Types and Tenures	SO5 – Economic Growth	SO6 – Sustainable Modes of Travel and Modal Shift	SO7 – Improving Quality of Life	SO8 – Protection of historic and natural environment	SO9 – Safeguard and Enhance Districts Natural Resources	SO10 – Mitigating and Adapting to Impacts of Climate Change	SO11 – High Quality Design of New Developments	SO12 – Community Pride
7. Landscape:	+/?	?	+	+	?	?	0	0	+	+	0	+	0
8. Cultural Heritage:	+/?	?	+	+/?	?	?	0	0	+	0	0	+	0
9. Health and well-being	+/-	+	+	+/-	+/-	+/-	+	+	+	0	+	0	0
10. Community Participation.	+	+	+	+	+	+	+	+	0	0	0	0	+
11. Housing.	+	0	+	0	+	0	0	0	-	0	-	+	0
12. Town Centre Vitality and Community Facilities and Services.	+	+	+	+	+	+	0	+	0	0	0	+	0
13. Economy.	+	+	+	+	0	+	+	0	-	0	-	0	0
14. Education.	+	+	+	+	0	0	0	+	0	0	0	0	0
15. Travel.	+/-	+	+/-	+/-	+/-	+/-	+	+	0	0	0	0	0

5.3 Issues and Options

5.3.1 The Issues and Options Document sets out a series of topic headings under which the Council considers the Plan Review needs to address and, where possible, the Options that need to be considered at this stage of Plan preparation. The topics identified in the Issues and Options Document are as follows:

- Strategic Issues for Bromsgrove District;
- Housing;
- Employment;
- Transport;
- Town Centre and Local Centres;
- Social Infrastructure;
- Natural Environment;
- Historic Environment; and
- Climate Change and Water Resources.

5.3.2 The Options considered under each topic and their performance against the SA Objectives are set out below. Consideration is also given to the revised National Planning Policy Framework and the implications for the topics and Options highlighted. Detailed appraisal matrices for the SA of the Issues and Options are provided in **Appendix D**.

5.4 Strategic Issues for Bromsgrove District

5.4.1 The strategic issues are:

- 1: Scale and timeframe of the new Plan;
- 2: Growing the economy and provision of strategic infrastructure;
- 3: Broad Options for Development Distribution and allocating land uses;
- 4: Co-operating with the West Midlands Conurbation to address wider development needs; and
- 5: Re-balancing the housing market.

5.4.2 These are discussed below:

Strategic Issue 1: Scale and timeframe of the new Plan

5.4.3 The District Plan acknowledges the potential role of Neighbourhood Development Plans (NDPs) in the District. There are 6 designated Neighbourhood Areas in the District.

5.4.4 Based on experience of undertaking SA of other local authorities that have NDPs in progress the SA recommends that:

- The District Plan sets the dwelling and employment target for those areas that are preparing an NDP;

- The Local Plan clearly indicates which policies are strategic, i.e. those policies NDPs should be general in conformity with; and
- The District Plan includes a policy setting out a provision for the District Council to consider planning applications in the event that a Neighbourhood Development Plan has not progressed.

Strategic Issue 2: Growing the economy and provision of strategic infrastructure

5.4.5 The Issues and Options Document highlights the need for additional employment land in the District and identified the M42 as an economic advantage which could be better used to attract high value industrial firms. Two motorway junctions within the District are reasonably unconstrained and undeveloped. If significant releases of land are to be considered it will be important for a robust evidence base to be in place in terms of the requirements for employment land of this nature in the sub-regional context. This would help demonstrate the exceptional circumstances for amending the Green Belt to enable development.

Strategic Issue 3: Broad Options for Development Distribution and allocating land uses

5.4.6 As noted in Section 4.3.5 of this report the Issues and Options Document identifies the following broad options that will need consideration:

- Option 1: Focus development on Bromsgrove town - this could take the form of an urban extension or extensions to the built up area and would include homes and possibly community infrastructure and employment depending on the scale of the housing development.
- Option 2: Focus development on transport corridors and/or locations with good transport links - this could focus on good accessibility to the primary road network, rail and other sustainable modes of transport in a bid to ease road traffic congestion within the District.
- Option 3: Focus development on the Large Settlements, as identified in the existing BDP - this could take the form of infilling and urban extensions to the settlements but likely to be on a smaller scale than Option 1 above. The amount of development which could be attributed to the settlements would need to take account of current settlement size, existing facilities and whether there is an opportunity to increase services and facilities, meaning that the levels of distribution may not be the same for all settlements.
- Option 4: Disperse development around the District, allocating some new growth to a variety of settlements to allow them to grow - this could distribute development throughout the District according to local assessments of capacity (particularly existing facilities). Distribution would be of different scales and/or infilling taking account of the size of the existing developed area.
- Option 5: Focus development on the edge of the West Midlands conurbation, along the border with Solihull/Birmingham/Dudley - this could take the form of an urban extension to the built up area and would include homes and possibly community infrastructure and employment depending on the scale of the housing development.
- Option 6: Focus development on the edge of Redditch - this could take the form of an urban extension to the built up area and would include homes and possibly community infrastructure and employment depending on the scale of the housing development. This would be in addition to the existing planned urban extensions discussed below under Option 8.
- Option 7: A new settlement - development of a significant scale which would also be able to support new community infrastructure and employment development.

- Option 8: Reconsideration of existing unconsented allocations on the boundary with Redditch Borough - reassess existing site allocations that have not been developed to consider their availability and deliverability and their appropriateness as site allocations. This Option concerns two sites. The Foxlydiate Site is an unconsented allocation to meet the needs of Redditch. It is allocated for 2,800 dwellings, a first school, local centre and associated community infrastructure, an outline planning application has been submitted but not determined. The second, the Brockhill site is located to the north of Redditch and is an allocation for 600 dwellings that forms part of a larger strategic site within Redditch Borough (1,025 dwellings, 8.45ha of employment, a district centre, first school and provision of public transport).
- Option 9: Urban intensification - development in existing urban areas and potential to increase densities on allocated sites in the current District Plan. Varying scales of development according to opportunities, however this option is highly unlikely to deliver the housing numbers needed on its own.

5.4.7 At this stage of the SA, and in the absence of more specific information on the Options, a generic approach has been taken to the appraisal of the above Options based on the typology of development, so for example the assessment of the new settlement option is not based on a specific area of search. The appraisal of the options will be refined during the next stage of the SA.

5.4.8 The scale of contribution that each Option could make to housing and employment needs is also uncertain at this time, and it is likely that a hybrid Option that allows elements of the above Options to make a contribution to need will be appropriate.

5.4.9 Matrices for each Option are presented in **Appendix D** and plans showing baseline information for Bromsgrove and the Large Settlements is also provided. A comparative assessment of the Options is provided in graphic form in **Table 5.2** below and the results of the appraisal against each SA Objective are also discussed below. Unless otherwise stated in the matrices, all effects are considered to be permanent, applicable in the short, medium and long terms and of District-wide significance.

Table 5.2 Summary of SA of the Broad Options for Development Distribution

SA OBJECTIVES	1. Focus Development on Bromsgrove Town	2. Focus Development on Transport Corridors and/or Locations with Good Transport Links	3. Focus Development on the Large Settlements	4. Disperse Development Around the District	5. Focus Development on the Edge of the West Midlands Conurbation	6. Focus Development on the Edge of Redditch	7. New Settlement	8. Reconsideration of Existing Unconsented Allocations on the Boundary with Redditch Borough	9. Urban Intensification
1. Water, Soil and Air Quality	++/+/-/-/?	++/+/-/-/?	++/+/-/-/?	++/+/-/-/?	++/+/-/-/?	++/-/-/?	++/-/-/?	++/-/-/?	++/+/-/-/?
2. Land Use	++/-/?	++/+/-/?	++/+/-/?	++/+/-/?	++/+/-/?	--/?	--/?	++/-/?	++/+/-
3. Waste	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?

SA OBJECTIVES	1. Focus Development on Bromsgrove Town	2. Focus Development on Transport Corridors and/or Locations with Good Transport Links	3. Focus Development on the Large Settlements	4. Disperse Development Around the District	5. Focus Development on the Edge of the West Midlands Conurbation	6. Focus Development on the Edge of Redditch	7. New Settlement	8. Reconsideration of Existing Unconsented Allocations on the Boundary with Redditch Borough	9. Urban Intensification
4. Flood Risk	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--	++/--
5. Climate Change	++/--	++/--	++/--	++/--	++/--/?	++/--	++/--	++/--	--/++
6. Biodiversity	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	+/--/?
7. Landscape	--	--	--	--	--	--	--	--	++/--
8. Cultural Heritage	?	?	?	?	?	?	?	?	?
9. Health and Well-being	++	++/?	++	++/?	++/?	++/?	++/?	++/?	++/--?
10. Community Participation	0	0	0	0	0	0	0	0	0
11. Housing	++	++	++	++	++	++	++	++	++/?
12. Town Centre Vitality and Community Facilities and Services	++	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?
13. Economy	++/?	++/?	++/?	++/?	++/?	++/?	++/?	0	?
14. Education	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?	++/?
15. Travel	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?	++/--/?

5.4.10

A mix of potentially significant positive and negative effects are identified in relation to SA Objective 1 'Water, Soil and Air Quality' for the majority of Options. Larger developments are more likely to be able to provide comprehensive approaches to water management and innovation in air quality management due to economies of scale and ability to plan strategically across a site. The

potential for significant positive effects is identified on this basis. There are existing Air Quality Management Areas in Bromsgrove Town and Hagley and additional development, in the absence of mitigation, could have further minor negative effects on air quality in these areas.

- 5.4.11 Birmingham and adjoining authorities have all declared local authority wide AQMAs so any development that results in additional motorised transport from the District to the conurbation could also have a significant negative effect on these, again this is uncertain at this stage.
- 5.4.12 The north western portion of the District lies in a Source Protection Zone (Zone III – total catchment) and much of the District lies in a Drinking Water Protected Area for surface water. Uncertainties are identified in relation to impacts on this resource in the absence of mitigation.
- 5.4.13 The re-use of previously developed land could give rise to positive and significant positive effects on land use (SA Objective 2) depending on the scale of development associated with relevant Options, urban intensification and elements of other Options could have a role in securing this, although urban intensification could also involve the loss of open spaces. The potential for significant negative effects, in the absence of mitigation is also identified in relation to potential effects on soils associated with the development of greenfield land, including Best and Most Versatile Agricultural Land that would be associated with all Options (SA Objective 2 'Land Use'). There are reserves of silica sand within the District that peripheral development under most Options could impact upon.
- 5.4.14 All options will give rise to increase waste and a minor negative effect is identified with uncertainties reflecting the impact of other policies at the local and national levels.
- 5.4.15 Due to its location in the headwaters of catchments, the District is not prone to major river flooding. It is however traversed by an extensive network of water courses which drain the Birmingham Plateau. These watercourses have a rapid response to rainfall during storm events and are prone to overtopping their banks, although in many cases this is attributable to blockages in the channel or problematic culverts. In addition, due to the rapid runoff experienced in the area, a number of events are attributable to surface or highway runoff or the flooding of the sewer network. Occurrences of sewer flooding (both foul and storm) have occurred in developed areas, including Bromsgrove town, Catshill and Marlbrook, Barnt Green, Rubery, Cofton Hackett, Hollywood, Wythall and West Hagley. There are no reports of groundwater flooding within the District Bromsgrove District and Redditch Borough Strategic Flood Risk Assessment Level 1, Final Report (2009). This baseline provides the context for assessing Options against SA Objective 4 'Flood Risk.'
- 5.4.16 Larger developments are more likely to provide opportunities for flood risk mitigation due to economies of scale and ability to plan strategically across a site. Significant green infrastructure development could have a positive effect by increasing infiltration and storm water retention times by providing space for flood waters to flow through and additional areas for temporary flood water storage.
- 5.4.17 A mixed score of significant positive (associated with opportunities to incorporate SuDS in new development) and significant negative (associated with the potential for a dispersed pattern of development to include areas at risk of flooding) is identified in relation to SA Objective 4 'Flood Risk,' recognising that new development might need to include some areas at flood risk.
- 5.4.18 The assessment of Options against SA Objective 5 'Climate Change' highlights that larger developments are more likely to provide opportunities for renewable energy schemes due to economies of scale and ability to plan strategically across a site. Larger developments are also more likely to provide greater opportunities for Green Infrastructure to help adapt to the effects of climate change due to economies of scale and ability to plan strategically across a site. The provision of green infrastructure will also assist with urban cooling. There is inevitably an increase

in greenhouse gas emissions related to an increase in transport and emissions associated with heating of dwellings. This could be exacerbated by dispersing development around the District as development in smaller villages is likely to be dependent on the car. A mix of significant positive and negative effects are therefore identified in all instances.

- 5.4.19 In terms of SA option 6 'Biodiversity' there are no European designated sites in Bromsgrove District itself although the European designated Lyppard Grange Ponds SAC and Fen Pools SAC are within 15km of the administrative boundary. The District contains 13 Sites of Special Scientific Importance (SSSIs) (three of which are for geological importance). Chaddersley Wood National Nature Reserve is an Ancient Woodland; a Local Wildlife Site (LWS); a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI). Other nature reserves in the District include Upton Warren and Hanbury Woods. In addition to the statutorily recognised SSSIs, there are 90 Local (Wildlife) Sites (five of which are recognised for geological value).
- 5.4.20 Development in proximity to such areas under all Options could give rise to significant negative effects. Development does also provide the opportunity to secure a net gain in biodiversity so the potential for significant positive effects is also identified. There are significant uncertainties in relation to the scoring for all Options at this stage.
- 5.4.21 The Worcestershire County Council Landscape Character Assessment identifies 10 different landscape character types within the District (excluding urban): Estate Farmlands, Principal Settled Farmlands, Principal Timbered Farmlands, Principal Wooded Hills, Sandstone Estatelands, Settled Farmlands with Pastoral Land Use, Timbered Pastures, Timbered Plateau Farmlands, Wooded Estatelands and Wooded Hills and Farmlands. In terms of SA Objective 7 'Landscape' development in or on the edge of all of these would impact on existing landscape character. Given the character of the existing landscape it is considered that there is potential for significant negative effects in relation to landscape associated with development on the edge of settlements. Intensification might also impact on townscape if not done sensitively.
- 5.4.22 The District has 469 Listed Buildings, 839 known sites of Archaeology Interest (13 of which are Scheduled Ancient Monuments), 12 Conservation Areas designated as being areas of special architectural or historic interest and 2 registered parks and gardens (Hagley Park and Hewell Grange) and also a number of other historic parks of regional importance. These features form the baseline for the consideration of effects against SA Objective 8 'Cultural Heritage'. Given the above factors, an uncertain score is identified in relation to potential effects on built heritage for all Options, given the extent of heritage features in the District all Options could impact on this objective to some extent.
- 5.4.23 Appraisal against SA Objective 9 'Health and Well-being' highlights that larger developments provide the critical mass to support new health facilities, but delivery is partly dependent on the delivery model preferred by health providers. Smaller scale development associated with intensification and dispersal provide the opportunity to support existing facilities. The potential for significant positive effects against SA Objective 9 are identified on the assumption that development would deliver or contribute to new facilities. Uncertainties are however identified because the dispersal strategy could result in development in relatively isolated locations with reliance on the car. This could create difficulties for some members of the community to access or be helped by health service providers.
- 5.4.24 Performance against SA Objective 10 'Community Participation' is considered to be neutral across all Options as the community will have the opportunity to participate in decisions through the local plan process, preparation of neighbourhood developments plans (where relevant) and through participation in planning applications that affect them. The SA did highlight that those options that would involve development on the edge of the district, e.g. Redditch and on the edge of the conurbation would need to include engagement with stakeholders outside of the District.

- 5.4.25 All Options are appraised as having a significant positive effect in relation to SA Objective 11 'Housing'. Although the extent to which each Option could contribute to need is difficult to gauge due to uncertainties around the capacity of the options, for example the contribution that Option 9 intensification is likely to make to meeting overall housing needs (beyond existing commitments) is unknown. Option 8 - reconsideration of unconsented allocations around Redditch relates to the provision of 3,400 dwellings. This represent a significant number of dwellings.
- 5.4.26 SA Objective 12 'Town Centre Vitality and Community Facilities and Services' suggests that some Options might perform better than others in terms of supporting existing town centres in the District and providing access to facilities and services. The dispersal strategy might dilute this effect, e.g. new residents in more peripheral settlements might gravitate to other towns outside of the District like Kidderminster or Redditch. Uncertainties are also identified because the dispersal strategy could result in development in relatively isolated locations with reliance on the car.
- 5.4.27 SA Objective 13 'Economy' is focussed on the development of a knowledge driven economy. Activities that fall within this sector are likely to have specific locational requirements and the ability of Options to provide these may vary. The potential for significant positive effects is identified as locations near Bromsgrove Town and the larger settlements in the District would provide sustainable locations for such development, however the scale and location of developments is uncertain at this stage. A more dispersed pattern of development might involve the provision of smaller employment sites, which could limit benefits associated with firms clustering together on larger employment sites.
- 5.4.28 SA Objective 14 'Education' identifies the potential for significant positive effects in relation to access to education. The current delivery model for provision of additional school places is based on developer contributions towards the expansion of existing schools. The extent to which future growth can be accommodated in this manner will need to be explored. A more dispersed strategy for development could mean that children need to travel further to access facilities.
- 5.4.29 SA Objective 15 'Travel' highlights that development focussed on locations with existing rail and bus services will provide transport choice. However, the 2011 census indicates that 73% of residents in the District travel to work by car, compared to 65% in the region. Larger developments such as urban extensions provide some potential for walking and cycling and the internalisation of trips, e.g. if schools and employment are provided on site. The potential for a minor negative effect in relation to SA Objective 15 'Travel' is also identified as all options will result in additional vehicle movements.
- 5.4.30 As noted earlier, it is likely that the District Plan will need to adopt a hybrid approach that reflects elements of some of the Options discussed. It would be premature at this stage to say which of the Options perform better in SA terms because there is little detail on the Options and the overall contribution they could make to meeting housing needs at this stage and hence their ability to meet wider sustainability objectives.
- 5.4.31 In summary the SA of the Options indicates that:
- All Options have significant positive effects in relation to housing (SA Objective 11) but there are uncertainties around the contribution that Option 9 'Intensification' could make in the absence of additional information on the capacity of settlements to intensify. The same comment applies to the majority of the other Options, although Option 8 is easier to quantify because it involves two existing strategic allocations;
 - There are uncertainties around the contribution that all of the Options could make to meeting SA Objective 13 'Economy' because the objective is focussed specifically on the development of a knowledge driven economy. Activities that fall within this sector are likely to have specific locational requirements and the ability of Options to provide these may vary. The potential for

significant positive effects is identified as locations near Bromsgrove Town and the larger settlements in the District would provide sustainable locations for such development, however the scale and location of developments is uncertain at this stage. A more dispersed pattern of development might involve the provision of smaller employment sites, which could limit benefits associated with firms clustering together on larger employment sites; The SA needs to understand the extent to which knowledge based activities would find mixed-use sites, that include an element of housing, attractive or if stand-alone employment sites are preferred;

- In the absence of mitigation, all Options have the potential to impact on waste, (SA Objective 3) flood risk (SA Objective 4), biodiversity (SA Objective 6), landscape/townscape (SA Objective 7) and cultural heritage (SA Objective 8) – the significance of effects will reflect the scale of development envisaged;
- The current District Plan is largely based on a strategy of expanding existing facilities, e.g. schools and health facilities. The ability to continue this approach is uncertain now but will be investigated through the Infrastructure Delivery Plan. If this strategy continues it will make the proximity of new sites to existing facilities and access to alternatives to the car important considerations (SA Objectives 9 'Health and Well-being, 12 'Town Centre Vitality and Community Facilities and Services, 14 'Education and 15 'Travel'); and
- Some Options might perform better than others in terms of supporting existing town centres and providing access to facilities and services. The dispersal strategy might dilute this effect, e.g. new residents in more peripheral settlements might gravitate to other towns outside of the District like Kidderminster or Redditch. Uncertainties are also identified because the dispersal strategy could result in development in relatively isolated locations with reliance on the car.

5.4.32

A number of recommendations were identified in undertaking the SA of the Options and these are identified in **Table 5.3** at the end of this section. For example, the District Plan could require major developments to be consistent with Garden Village principles, which include:⁹⁰

- Land value capture for the benefit of the community;
- Strong vision, leadership and community engagement;
- Community ownership of land and long-term stewardship of assets;
- Mixed-tenure homes and housing types that are genuinely affordable;
- A wide range of local jobs in the Garden City within easy commuting distance of homes;
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food;
- Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience;
- Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods; and
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

⁹⁰ <https://www.tcpa.org.uk/garden-city-principles>

Strategic Issue 4: Co-operating with the West Midlands Conurbation to address wider development needs

- 5.4.33 This section highlights the need to address the District's role in potentially accommodating some of the Greater Birmingham Housing Market Area's needs. At this stage it is difficult for the SA to comment further on this but it is something that will need to be considered in later iterations of the SA.

Strategic Issue 5: Re-balancing the Housing Market through Housing Growth

- 5.4.34 The following Options are considered under this issue:
- Option 1: Allocate land for about 6,500 dwellings up to 2036;
 - Option 2: Allocate land for about 8,350 dwellings up to 2041;
 - Option 3: Allocate land for about 10,200 dwellings up to 2046; and
 - Option 4: Irrespective of the length of the Plan period, allocate land for more homes than recommended by the standard methodology.

Appraisal of Options

- 5.4.35 Options 1 to 3 would involve the same annual rate of development but over different timescales, so the effects are essentially the same. Uncertainties exist over the scale of development associated with Option 4, although it would be higher than the scale of development associated with Options 1 to 3. Higher rates of growth would need to be justified in the District Plan but could be derived from a growth in jobs in the District and/or provision of housing to meet wider needs, e.g. from the Conurbation and/or Redditch. All Options would meet the OAN and include previously allocated provision of 2,500 dwellings within the District to 2030.
- 5.4.36 The potential for significant negative effects is identified for all Options in relation to SA Objective 1 'Water, Soil and Air Quality,' SA Objective 2 'Land Use,' and SA Objective 3 'Waste'. New development will result in the potential for significant negative effects in relation to water and air quality and loss of soils, including Best and Most Versatile Agricultural land. Minor positive effects are identified because of the potential to re-use previously developed land and buildings and measures to reduce water consumption.
- 5.4.37 A mix of significant positive and negative effects are identified in relation to SA Objective 5 'Climate Change'. New residential development provides the opportunity to provide more energy efficient dwellings that reduce the contribution to climate change and measures to increase walking and cycling and use of public transport. New development also provides the opportunity to deliver green infrastructure that will assist with climate change adaptation. New development will also lead to emissions that will contribute to climate change, including transport related emissions.
- 5.4.38 A mix of significant positive and negative effects are identified in relation to SA Objective 6 'Biodiversity'. New development provides opportunities for biodiversity improvements, including the potential to support new habitat creation and enhance any retained habitat. However, it is also anticipated that there will be negative impacts on biodiversity as a result of the scale of development, the land take required and associated effects arising from direct habitat loss, disturbance and disruption. The significance of the negative effects on biodiversity will depend on whether national or internationally designated conservation features would be affected by the proposals.
- 5.4.39 Significant positive effects, with some uncertainty, are identified for SA Objectives 9 'Health and Well-being,' 11 'Housing,' 12 'Town Centres and Community Facilities and Services' and 14

'Education'. The uncertainties relate to the extent to which new housing is located so as to secure the potential benefits identified. For example, new housing could benefit the town and local centres and ensure that people can access local services and facilities but only if homes are appropriately located.

- 5.4.40 Neutral effects, are identified for SA Objective 10 'Community Participation'. Performance against this objective is considered to be neutral across all options as the community will have the opportunity to participate in decisions through the local plan process, preparation of neighbourhood developments plans (where relevant) and through participation in planning applications that affect them.
- 5.4.41 Minor positive effects, with some uncertainty, are identified for SA Objective 13 'Economy'. Providing new dwellings on the scale envisaged could help maintain the existing supply of labour within the District.
- 5.4.42 Uncertain effects are identified in relation to SA Objectives 4 'Flood risk' 7 'Landscape,' 8 'Cultural Heritage' and 15 'Travel'. Performance against these objectives is dependent on the location of development in relation to relevant features.
- 5.4.43 No significant variation in the performance of the Options against the SA Objectives was identified because they relate to the same rate of development over different timescales, rather than higher rates of development over the same timescale. The exception is Option 4 but the scale of development is not specified. It will be important that the balance between homes and jobs is considered in relation to Option 4 so as to encourage a sustainable pattern of development, i.e. avoiding an increase in the rate of out-commuting from the District.
- 5.4.44 The matrix includes a number of recommendations that the District Plan could consider in order to help mitigate the effects identified and these are set out in Table 5.3 at the end of this section.

5.5 Housing

- 5.5.1 The following Issues are considered under this topic:
- Housing density (four Options identified);
 - Affordable housing;
 - Housing mix (two Options identified);
 - Homes for the elderly;
 - Self-build & Custom House building and Innovative Design Standards (two Options identified); and
 - Accommodation for Gypsies, Travellers and Travelling Showpeople (three Options identified).
- 5.5.2 The Options considered under relevant Issues are discussed in turn below and completed matrices are provided in **Appendix D**.

Housing Density

- 5.5.3 The following Options are considered under this issue:
- Option 1: Set a specific minimum density requirement for the District as a whole;
 - Option 2: Set different minimum density requirements for different parts of the District;

- Option 3: Rely on local distinctiveness and character within the District so that new housing fits in with its surroundings; and
- Option 4: Influence site density through good design.

Appraisal of Options

5.5.4 A range of minor positive effects were identified with some uncertainty about outcomes. Effects associated with Options 1 and 2 would be very dependent on the minimum density adopted. Some examples of uncertainties are discussed below:

- Increasing densities could help make district heating viable as an option, a minor positive effect is identified with some uncertainty around the viability of district heating in the District (SA Objective 5);
- Encouraging higher density development could impact on the ability of development to incorporate features that might help deliver net gains in biodiversity (SA Objective 6);
- Minimum densities could help reduce land-take and therefore reduce impacts on landscape and townscape associated with the loss of greenfield land (SA Objective 7), however they could also impact on townscape if local character is not respected; and
- Minimum densities might encourage walking and cycling (assuming residential development is provided as part of a minimum mixed-use scheme). However minimum densities might impact on the ability of sites to provide a range of open spaces on site. A minor positive effect with some uncertainty is identified (SA Objective 9 on Health and Well-being).

5.5.5 The appraisal of the Options highlights the need for density to be balanced with other factors.

Affordable Housing

5.5.6 A series of questions are presented in relation to affordable housing and the Issues and Options Document also notes that the definition of affordable housing is changing in response to Central Government initiatives, with Starter Homes falling under the definition of affordable housing.

5.5.7 The Issues and Options Document also comments on whether affordable housing should be clustered or pepper-potted within sites.

5.5.8 The relevance of these Issues will vary according to the size of site involved. The way in which sites come forward is also important, for example if a larger site comes forward in phases, one option would be to require some affordable housing to be provided within each phase, which is likely to be enable an element of pepper-potting.

5.5.9 The SA will review specific policies in relation to affordable housing once they are in place, but it may also be appropriate for the development requirements for larger sites to provide guidance on these matters.

Housing Mix

5.5.10 Two Options are considered under this issue:

- Option 1: Be guided by market signals to determine the size and type of homes the District needs; and
- Option 2: Set size and type guidance for different parts of the District.

Appraisal of Options

- 5.5.11 No significant effects were identified for most of the SA Objectives. Minor positive effects, key points are summarised below:
- SA Objective 11 'Housing' – Both options would have a minor positive effect but leaving the size and type of dwellings to the market (under Option 1) could lead to certain types of housing being delivered, e.g. larger dwellings and a reliance on affordable housing to broaden the housing on offer;
 - SA Objective 13 'Economy' - Leaving the market to determine the mix of housing stock could lead to an under provision of housing for lower income earners, which could lead to additional commuting if they work in the District and had to live elsewhere. Uncertain effects are therefore identified for Option 1. Option 2 contributes positively on the basis that it will encourage a broader mix of dwelling types; and
 - SA Objective 15 'Travel' - Leaving the market to determine the mix of housing stock could lead to an under-provision of housing for lower income earners, which could lead to additional commuting if they work in the District and had to live elsewhere, with a potential impact on travel patterns. Uncertain effects are therefore identified for Option 1, whilst Option 2 contributes positively on the basis that it will encourage a broader mix of dwelling types, but uncertainties are identified in relation to the location of development.
- 5.5.12 The SA highlights the importance of the District Plan encouraging a mix and range of dwellings to be provided.

Homes for the Elderly

- 5.5.13 No specific Options are discussed in this section of the Issues and Options Document. Questions are asked in relation to downsizing and the type of home that would be needed as people get older.
- 5.5.14 Going forward the SA will review the extent to which the District Plan provides for a range of housing, including accommodation for the elderly but also the extent to which it encourages Lifetime Homes⁹¹ and Lifetime Neighbourhoods.⁹²

Self Build and Custom Housing

- 5.5.15 Two Options are considered under this issue:
- Option 1: Allocate sites purely to meet the provisions of the self-build market; and
 - Option 2: Ask developers to provide a number of plots for the self-build market on larger housing sites.

Appraisal of Options

- 5.5.16 The appraisal of the Options highlights the potential for some uncertainties in relation to Option 1. The consequences of allocating a site purely for self-build are uncertain. They would depend on the scale of the allocation and how the overall design of the site was undertaken, e.g. identification

⁹¹ <http://www.lifetimehomes.org.uk/>

⁹² <https://www.gov.uk/government/publications/lifetime-neighbourhoods--2>

of individual plots and associated site wide mitigation measures, such as flood risk attenuation, surface water attenuation and soil management. That said, the Issues and Options document indicates that there are currently only 19 entries on the Council's Register for such sites, so any effects are not likely to be significant at the District level.

5.5.17 A recent study on self-build concluded:⁹³

"It is challenging for planning policy to identify or allocate plots suitable for self-build serviced plots to be delivered, especially on private land. Where councils have suitable land assets and a commitment to encouraging self-build, there is a higher likelihood that sufficient serviced plots will be delivered to meet demand. Conversely where these conditions don't exist, delivery is at a lower rate and new mechanisms such as partnerships with land developers need to be explored in order to foster market supply."

5.5.18 In responding to this issue, it will be important to understand the aspirations of people on the register – would they want to live in estate type housing as part of a larger site or is there an aspiration for a standalone plot?

5.5.19 This section of the Issues and Options Document discusses wider issues around good design, including 'Building for Life.' Any use of such standards would need to be on a voluntary basis (following the Government's Housing Standards Review). The authors of the SA would support the District Plan encouraging the use of such standards on a voluntary basis and one of the recommendations from this SA is that the Council encourages the use of the Home Quality Mark, which was developed by the Building Research Establishment following the withdrawal of the Code for Sustainable Homes. There are no restrictions in terms of sustainable design and construction and commercial buildings, with the BREEAM Standard available to use on such developments.

Accommodation for Gypsies and Travellers

5.5.20 The following Options are considered under this issue:

- Option 1: Extend existing facilities within the District;
- Option 2: Allocate a new site for permanent pitches within the District; and
- Option 3: Allocate land for a transit site for families passing through the District.

Appraisal of Options

5.5.21 The Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA) identified a need for 9 permanent pitches in the District between 2019/20 and 2033/34 but did not identify any need for a transit site within the District. It is suggested that Option 3 would therefore require additional justification, e.g. is the intention to provide an Emergency Stopping Place to help with unauthorised encampments? Emergency Stopping Places are associated with shorter stays (up to 28 days), while transit sites are associated with longer stays (up to three months). If an Emergency Stopping Place is envisaged then it may be appropriate to adopt this terminology so that the purpose of the site is clear.

5.5.22 In terms of the size of permanent sites, a Government Good Practice Guide on Designing Gypsy and Traveller Sites (2008) (which has been withdrawn) states:

⁹³ Local Government Association (June 2016) Planning for Self-Build and Custom Housebuilding Report

“There is no one ideal size of site or number of pitches although experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family.”

5.5.23 The effects associated with Options 1 and 2 would therefore depend on the scale of the resulting sites. Clearly if all 9 pitches were provided on a new site they would be within the recommended maximum of 15 pitches but the provision of smaller sites for extended families would also be acceptable.

5.5.24 It is understood that there are two existing permanent sites in the District, Houndsfield Lane (25 pitches)⁹⁴ and Sheltwood Lane, Tardebigge. The number of pitches on the Tardebigge site is not clear but the site is in the Green Belt, therefore any extension to the site would need to be assessed against Green Belt policy.

5.5.25 The performance of the Options is largely uncertain at this stage as it would depend on the nature and location of development. Minor positive impacts are identified in relation to SA Objectives 9 ‘Health’ and 14 ‘Education’ as a settled base would help residents access these facilities.

5.6 Employment

5.6.1 The following Issues are considered under this topic:

- Growing the Local Economy (four Options identified);
- The Type and Location of Employment Land (four Options identified);
- Employment Opportunities in Rural Bromsgrove (two Options identified); and
- Telecommunications.

Growing the Local Economy

5.6.2 The following Options are considered under this issue:

- Option 1: Plan for a minimum level, relating to assessed needs, of employment development across the Plan period;
- Option 2: Plan for a small uplift in jobs and land requirement, in the region of 10% above minimum evidence requirements (to allow for market flexibility and choice of sites but not enough to significantly alter Bromsgrove’s current employment offer);
- Option 3: Plan for a large uplift in jobs and land requirement, in the region of 25% above minimum evidence requirements (to allow for market flexibility and choice of sites as well as aiming for significant inward investment to the District in the form of major employment development); and
- Option 4: Plan for a level of employment development that aligns with levels of housing growth in the District over the course of the Plan period, including consideration of any housing or employment shortfall arising from neighbouring local authorities.

⁹⁴ DCLG (2018) Traveller caravan count live tables July 2017, Revised:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/674057/Traveller_caravan_count_live_tables_July_2017_revised.xlsx

Appraisal of Options

- 5.6.3 The scale and, in particular, the location of growth associated with these Options is uncertain at this time. It is therefore difficult to differentiate between the Options.
- 5.6.4 The potential for significant negative effects (in combination with minor positive effects) is identified for a range of SA Objectives.
- 5.6.5 New employment related development provides the opportunity for buildings to incorporate water conservation measures (a minor positive impact). Higher standards can be sought in areas of growing pressure on water supply (and where the effects of climate change could increase water stress). There could also be significant negative impacts on soil associated with new development on greenfield sites. Impacts would be dependent on the balance between the proposed development being located on greenfield land or previously developed land and buildings. Additional development will bring associated impacts on air quality, e.g. associated with transport (SA Objective 1 'Water, Soil and Air Quality').
- 5.6.6 New development provides opportunities for the integration of effective waste efficiency measures when developed and a minor positive effect is identified. The construction and subsequent occupation of developments would mean that there will be a net increase in construction (temporary) and commercial/industrial waste (permanent) and a significant negative effect is identified (SA Objective 3 'Waste').
- 5.6.7 A mix of significant positive and negative effects are identified in relation to SA Objectives 5 'Climate Change' and 6 'Biodiversity'. The reasoning is the same as that for housing related growth.
- 5.6.8 Significant positive effects (with some uncertainty around location) are identified in relation to SA Objective 12 'Town Centre Vitality and Community Facilities and Services' because employment development in the right locations could help support existing centres through increase footfall and expenditure (and some facilities could be supported by developer contributions). Benefits will depend on the location of new employment relative to town and local centres.
- 5.6.9 Significant positive effects (with some uncertainty around the market attractiveness of sites) are identified for SA Objective 13 'Economy'. Uncertainties are identified at this stage and the extent to which the sites identified will be attractive to knowledge based activities.
- 5.6.10 A key area of uncertainty is the extent to which any significant increase in employment land associated with Option 3 would feedback into a requirement for additional housing. Aligning employment growth with additional housing to meet wider needs under Option 4 would be desirable to reduce the need for additional commuting. Options 1 and 2 would likely have less impact on a range of SA Objectives, including SA Objectives 5 'Climate Change' and 6 'Biodiversity' and 15 'Travel.'

The Type and Location of Employment Land

- 5.6.11 The following Options are considered under this issue:
- Option 1: Meet as much employment need as possible on existing designated sites where intensification opportunities exist (these opportunities may only meet a small proportion of need);
 - Option 2: Expand existing employment sites, involving Green Belt release around currently designated employment land, to increase land supply beyond that offered by Option 1;
 - Option 3: Allocate new freestanding employment sites in sustainable locations, involving Green Belt release, as a means of targeting new inward investment in the District; and

- Option 4: Allocate new employment land for approximately 25 ha sites to meet the needs of medium and large firms as part of mixed use strategic allocations, where large scale housing allocations are proposed in the Plan review, involving Green Belt release. This could include wider employment generating uses as well as more traditional B use employment development.

Appraisal of Options

- 5.6.12 It is difficult to differentiate between these Options in sustainability terms. All of the Options are judged to make a significant contribution to SA Objective 13 'Economy'. The contribution that Option 1 could make to this objective is however uncertain as the capacity of existing sites is not known. Similarly, the impact of intensification of employment sites on their attractiveness to existing and future occupants is uncertain.
- 5.6.13 Minor positive effects (with some uncertainty) are identified for SA Objective 15 'Travel'. The contribution that each of the Options could make to this objective is potentially positive with some uncertainty. Intensifying existing employment sites could help intensify use of existing public transport provision (Options 1 and 2), free standing sites and sites based on mixed use schemes could also contribute but the level of contribution will depend on site location in relation to other services and facilities.

Employment Opportunities in Rural Bromsgrove

- 5.6.14 Three Options are considered under this issue:
- Option 1: Encourage rural enterprise, through supporting diversification, conversion and infill opportunities (recognising these opportunities may only meet a small proportion of need);
 - Option 2: Allocate land in rural areas for employment development, where proven to be a sustainable location and attractive to the market. (This may be more appropriate should new housing growth be proposed in a rural location but would require Green Belt release); and
 - Option 3: Provide a mix of both of the above Options.

Appraisal of Options

- 5.6.15 The scale of effects is uncertain at this stage. Options 1 and 3 might perform better than Option 2 in relation to some factors, particularly Soils, (SA Objective 1), Land Use (SA Objective 2) and the re-use of previously developed land and buildings.
- 5.6.16 Options 1 and 3 could help provide long term uses for buildings that contribute to cultural heritage (SA Objective 8 'Cultural Heritage') but overall an uncertain effect is identified because the outcome would depend on the appropriateness of the proposed use and extent of any conversion work.

Telecommunications

- 5.6.17 No options are presented under this topic, but the Issues and Options document highlights the importance of advanced, high quality and reliable telecommunications infrastructure for economic growth and, subsequently brings improvements to residential networks. The need to support the expansion of electronic communications networks, including next generation mobile technology and high speed broadband connections is highlighted, especially if growth within the District's economy is to be encouraged.

5.7 Transport

5.7.1 The following Issues are considered under this topic:

- Car journeys and impact on the road network;
- Accessibility to public transport services; and
- Opportunities to increase walking and cycling.

5.7.2 At this stage no Options have been put forward in relation to this topic. The District Plan could clearly have role in encouraging and enabling modal shift, e.g. by requiring the preparation of Travel Plans for major developments and delivering the infrastructure to encourage and enable walking, cycling and use of public transport in the District. Later iterations of the SA will review the District Plan to identify the extent to which these are referred to in the District Plan.

5.8 Town Centre and Local Centres

5.8.1 The following Issues are considered under this topic:

- Regenerating Bromsgrove Town Centre;
- Town Centre Movement and Connectivity; and
- Local Centres.

5.8.2 At this stage no Options have been put forward in relation to this topic. From a review of the revised NPPF one of the policy themes that could be incorporated in this section of the District Plan is the 'agent of change' principle (paragraph 182 of the NPPF refers). This seeks to ensure that new development can be integrated effectively with existing businesses and community facilities (including places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where an existing business or community facility has effects that could be deemed a statutory nuisance in the light of new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to secure suitable mitigation before the development has been completed.

5.9 Social Infrastructure

5.9.1 The following Issues are considered under this topic:

- Community Facilities;
- Health Facilities;
- Education; and
- Open Space, Sports and Recreation.

5.9.2 At this stage no Options have been put forward in relation to this topic.

5.9.3 The Issues and Options Document identifies access to facilities in rural areas as an issue and it is suggested that the District Plan includes a policy that encourages the dual use of facilities.

5.10 Natural Environment

5.10.1 Options relating to amending existing policies from the Bromsgrove District Plan are considered under this issue, as follows:

- Option 1: Leave the policies as they are if they are fit for purpose and only consider amending them when national legislation and planning policy renders them out of date; and
- Option 2: Rewrite the policies.

Appraisal of Options

5.10.2 The policies in question are Policy BDP21: Natural Environment and BDP24: Green Infrastructure. A range of positive effects (significant and minor) are identified in relation to these policies.

5.10.3 Policies BDP21 and BDP24 will contribute to SA Objective 2 'Land Use' as they set the policy context for the achievement of this objective.

5.10.4 Policy BDP24 seeks to ensure that development delivers the multiple benefits and vital services of Green Infrastructure – Option 1 could therefore include significant positive effects in relation to SA Objective 4 'Flood Risk', SA Objective 5 'Climate Change', SA Objective 6 'Biodiversity' and SA Objective 15 'Travel'.

5.10.5 Significant positive effects are also identified in relation to SA Objectives 7 'Landscape,' 8 'Cultural Heritage' and 9 'Health' through the provision of a high quality built and natural environment.

5.10.6 Given the anticipated timing of the District Plan there should be sufficient time to rewrite the policy to reflect the revised NPPF if necessary, this will be important to avoid a local policy gap.

5.10.7 Effects in relation to Option 2 are uncertain because the way in which the policies would be re-written is unknown at this time, although they would clearly need to comply with the revised NPPF.

5.11 Historic Environment

5.11.1 Options relating to amending an existing policy from the Bromsgrove District Plan (BDP20) are considered under this issue, as follows:

- Option 1: Leave the policy as it is if it is fit for purpose and only consider amending it when national legislation and planning policy renders it out of date; and
- Option 2: Rewrite the policy.

5.11.2 Policy BDP20 supports the sensitive reuse of redundant historic buildings and encourages proposals that provide for a sustainable future for heritage assets, particularly those at risk. A significant positive effect is identified in relation to SA Objective 2 'Land Use'.

5.11.3 The policy encourages opportunities to mitigate the effects of climate change, including re-use and of historic buildings and their modification to reduce carbon emissions – this could include benefits in terms of climate change adaption and mitigation and a significant positive effect is identified in relation to Option 1 and SA Objective 5 'Climate change'.

5.11.4 Policy BDP20 will contribute to a high quality built and natural environment, which could help create an attractive environment for inward investment and a minor positive effect in relation to SA Objective 13 'Economy' is identified on this basis. Heritage related tourism is also an important facet of the economy, although this objective is focussed on the knowledge based economy.

- 5.11.5 Given the anticipated timing of the District Plan there should be sufficient time to rewrite the policy to reflect the revised NPPF if necessary, this will be important to avoid a local policy gap.
- 5.11.6 Effects in relation to Option 2 are uncertain because the way in which the policy would be re-written is unknown at this time, although it would clearly need to comply with the revised NPPF.

5.12 Climate Change and Water Resources

- 5.12.1 Options relating to amending existing policies from the Bromsgrove District Plan are considered under this issue (Policy BDP22 'Climate Change' and BDP 23 'Water Management,' as follows:
- Option 1: Leave the policies as they are if they are fit for purpose and only consider amending them when national legislation and planning policy renders them out of date; and
 - Option 2: Rewrite the policies.

Appraisal of Options

- 5.12.2 Policy BDP22 supports low or zero carbon energy generation schemes when adverse impacts are addressed satisfactorily. Policy BDP23 includes measures to reduce the consumption of water in new development and protects water quality by requiring developers to have regard to relevant plans and programmes. The policy also encourages early engagement with Severn Trent in relation to waste water management. Significant positive effects are identified in relation to SA Objective 1 'Water, Soil and Air Quality'.
- 5.12.3 Policy BDP22 encourages the construction of design and developments to have regard to the waste management hierarchy and a significant positive effect is identified. The policy also supports waste to energy schemes although not explicitly. A significant positive effect in relation to SA Objective 3 'Waste' is identified.
- 5.12.4 Policy BD23 has a range of measures in relation to flood risk and also encourages the use of SuDS and deculverting to improve the biodiversity value of watercourses. Significant positive effects are identified in relation to SA Objective 4 'Flood Risk,' 5 'Climate Change' and 6 'Biodiversity'.
- 5.12.5 BDP 22 seeks to ensure that developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure and a significant positive effect is identified in relation to SA Objective 15 'Travel'.
- 5.12.6 Effects in relation to Option 2 are uncertain because the way in which the policies would be re-written is unknown at this time, although they would clearly need to comply with the NPPF.

5.13 Green Belt

- 5.13.1 The 'Evidence Base' section of the Issues and Options Document discusses the Green Belt and in particular whether or not the District Plan should amend the Green Belt boundary to identify land that is safeguarded to meet longer term needs.
- 5.13.2 Whilst Green Belt is not a SA issue *per se*, it is suggested that the District Plan includes a policy to secure positive use of the Green Belt, which would accord with the current and emerging NPPF and help achieve relevant SA Objectives, including SA Objective 7 'Landscape, 9 'Health and Well-being and 15 'Travel.'

5.14 Recommendations

5.14.1 **Table 5.3** sets out recommendations from the appraisal of the policies and sites. The Council will be asked to consider these recommendations as it develops the District Plan. The Council is not obliged to accept the recommendations.

Table 5.3 Recommendations from the SA

Recommendation
District Plan policies to require water conservation measures in built development, including the need for higher standards where there is evidence of water stress, now or over the plan period.
District Plan to require use of soil management plans.
District Plan policies should include policies to help optimise the use of previously developed land and buildings.
District Plan to promote air quality neutral development where justified.
District Plan policies could encourage voluntary use of the Home Quality Mark. ⁹⁵
The District Plan should encourage minerals to be worked prior to development where possible.
Opportunities should be sought to minimise the creation of construction waste using design, materials selection and onsite and offsite reuse.
District Plan policies to require the use of sustainable urban drainage where suitable.
District Plan polices to encourage residential developments to incorporate renewable energy schemes and electric vehicle charging points.
District Plan policies to encourage developments to secure a net gain in biodiversity.
District Plan to require development sites to incorporate Green Infrastructure/structural landscaping that will help reduce landscape and visual impacts.
District Plan to be informed by Heritage Impact Assessment of potential sites.
District Plan to include policies in relation to over concentration of fast food outlets if justified.
Strategic sites to be informed by Health Impact Assessment.
District Plan could include policy in relation to provision of apprenticeships associated with the construction of new housing in the District.
District Plan policies to encourage Lifetime Homes and Lifetime Neighbourhoods
District Plan to ensure that a range of sites are provided in terms of size and market attractiveness, including sites to meet knowledge based activities.
District Plan to adopt the 'agent of change' principle (as set out in the NPPF).
District Plan to include a policy that encourages the dual use of community facilities.

⁹⁵ <https://www.homequalitymark.com/what-is-the-hqm>

Recommendation

The District to include a policy to secure positive use of the Green Belt
The District Plan to identify the need to safeguard existing aquifer and water quality.
District Plan to require silica sand to be worked prior to development where this is feasible.
District Plan policies to encourage local procurement, training and recruitment.
District Plan to advocate that major housing-led developments adopt Garden-Village Principles

5.15 Cumulative, Synergistic and Secondary Effects

5.15.1 In determining the significance of effects of a plan or programme, the SEA Directive requires that consideration is given to the cumulative nature of the effects.

5.15.2 At this stage it is considered premature to consider the potential for cumulative effects, given the preliminary stage that the District Plan is at. The next iteration of the SA Report will consider potential cumulative effects associated with policies, proposals and those associated with other plans and programmes in accordance with the methodology set out in the Scoping Report.



6. Conclusions, Monitoring and Next Steps

6.1 Conclusions

6.1.1 This SA Report has presented the findings of the appraisal of the Issues and Options Document. Specifically, the SA has considered the following key components of the Draft Issues and Options Document:

- District Plan Vision and Strategic Objectives; and
- Issues and Options.

District Plan Vision and Objectives

6.1.2 The Vision for the District seeks to deliver sustainable and prosperous, safe and healthy communities, whilst also looking to preserve the attractiveness of the district. The Vision is compatible with a number of the SA Objectives as it will help to foster community participation (SA Objective 10) in the District, deliver new housing (SA Objective 11), ensure vibrant town centres (SA Objective 12), support the economy (SA Objective 13) and support education (SA Objective 14).

6.1.3 There is the potential for conflicts particularly between those elements of the Vision that support economic growth and social transformation and SA Objectives concerning flood risk, environmental protection and enhancement (and vice-versa), although the extent of any conflict is likely to depend on how the Vision is realised through the policies and proposals of the Preferred Options District Plan. In consequence, where the relationship between the Vision and SA Objectives relating to flood risk, biodiversity, cultural heritage and landscape has been assessed as being compatible, a degree of uncertainty has been identified. Similar tensions exist between the Strategic objectives. Tensions of this nature are typical for exercises of this nature and no amendments to the Vision and Plan objectives are proposed.

Issues and Options

6.1.4 The Issues and Options Document discusses a range of policy related topics and Options have been appraised in the SA where they are presented in the Issues and Options Document. A series of recommendations for additional policies that might help avoid or mitigate potential effects have been identified, for example the District Plan could require developments that might impact on air quality to be air quality neutral.

6.1.5 The Issues and Options Document identifies a number of Spatial Options that will need to be considered and the SA Report has given initial consideration to these, albeit at a high level. Further recommendations arose from this process, including the opportunity for the District Plan to require major housing-led development to adhere to Garden Village Principles.

6.1.6 The next stages of the SA will give more detailed consideration to Options, reflecting the content of the District Plan.

6.2 Monitoring

6.2.1 It is a requirement of the SEA Directive to establish how the significant sustainability effects of implementing the District Plan will be monitored. However, as earlier government guidance on SEA (ODPM et al, 2005) notes, it is not necessary to monitor everything, or monitor an effect

indefinitely. Instead, monitoring needs to be focused on significant sustainability effects. Monitoring the District Plan for sustainability effects can help to answer questions such as:

- Were the SA's predictions of sustainability effects accurate?
- Is the District Plan contributing to the achievement of desired SA Objectives?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

6.2.2 Monitoring should be focussed on:

- Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
- Significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
- Where there is the potential for effects to occur on sensitive environmental receptors.

6.2.3 Further consideration will be given to the monitoring requirements of the SEA Directive and how these can be integrated into monitoring for the District Plan in later iterations of this SA and the Post Adoption Statement.

6.3 Consulting on this SA Report

6.3.1 This SA Report is being issued for consultation alongside the Issues and Options Report and other technical material. We would welcome your views on any aspect of this SA Report.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of this SA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

Please provide your comments by 5.00pm on the 19th of November. Comments should be sent:

Using the online form available at: www.bromsgrove.gov.uk/districtplan

By email: strategicplanning@bromsgroveandredditch.gov.uk

By post: Strategic Planning Team, Bromsgrove District Council, Town Hall, Walter Stranz Square, Redditch, Worcestershire, B98 8AH

6.4 Next Steps

6.4.1 Following consultation, the SA Report, together with the consultation responses received, will be used to inform the preparation of the next iteration of the District Plan.

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