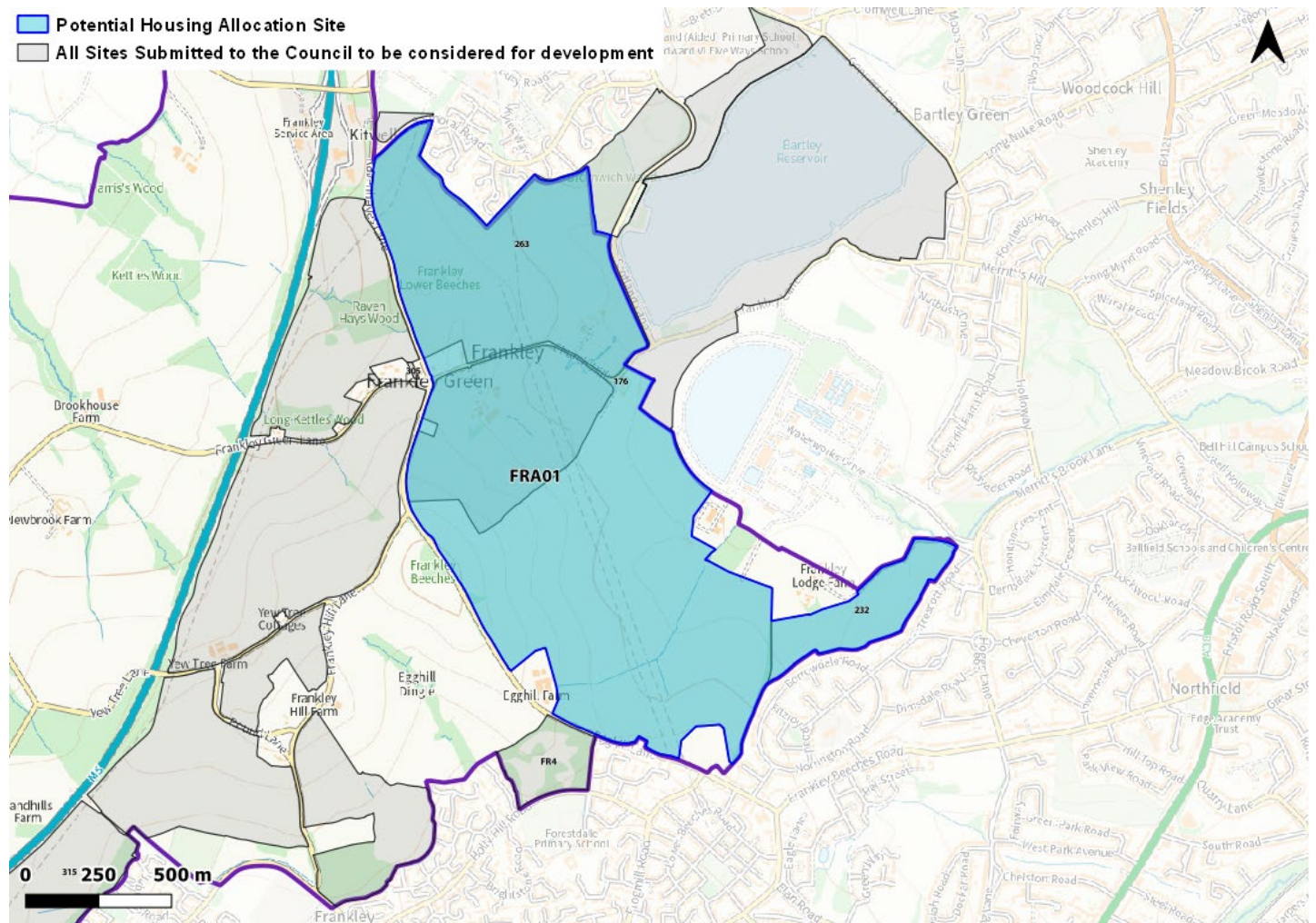


Settlement Summary: Frankley



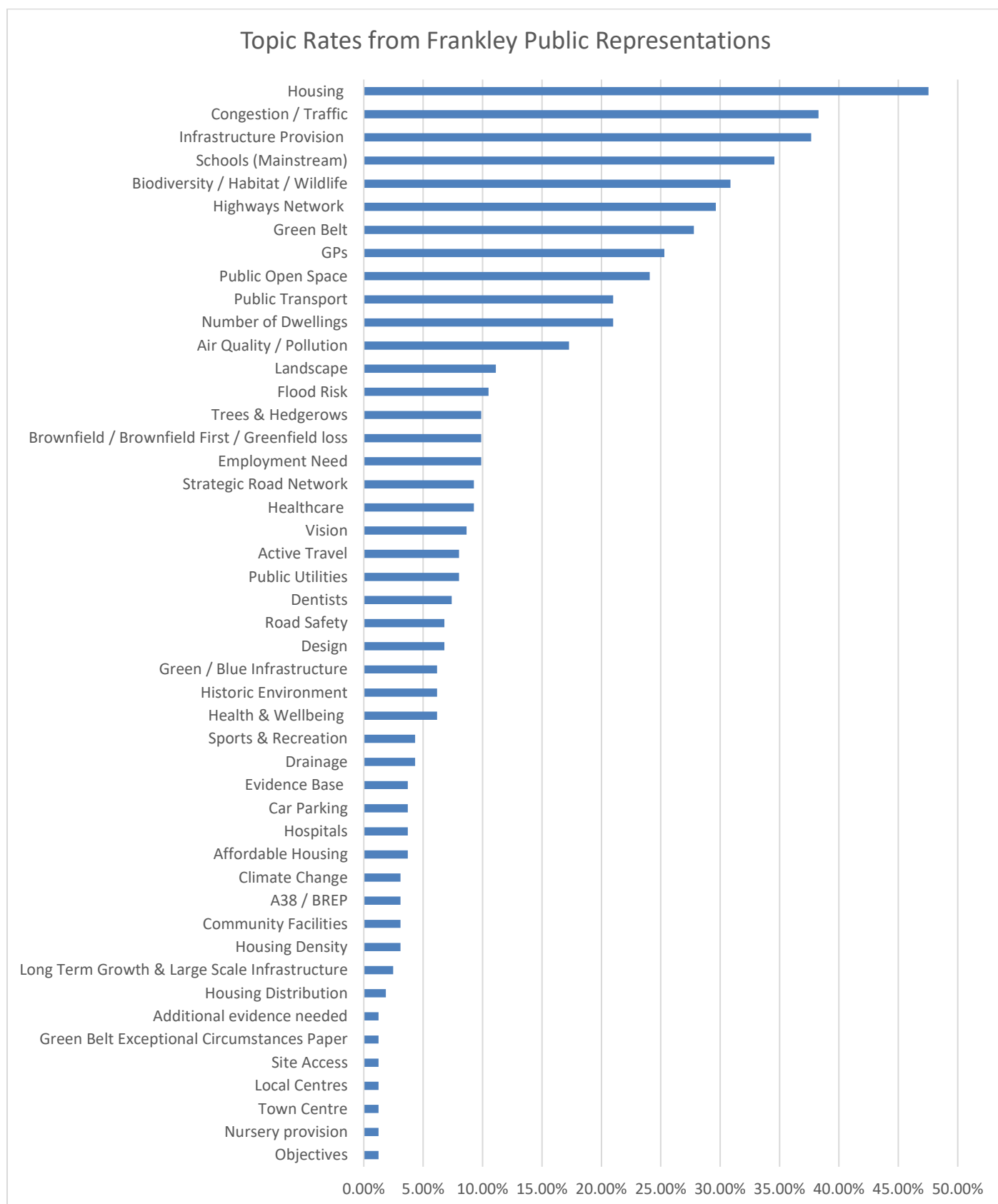
Introduction

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

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

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

Members of the Public



Members of the Public:

Frankley & FRA01 – Key Points

Housing: Objections to the scale and concentration of 3,000 dwellings in one location, some noting that this represents a significant percentage of the District's housing need. Many question why so many new houses are needed in the area and the cumulative impacts from developments in Longbridge and Frankley Park in close proximity. The homes would serve Birmingham rather than Bromsgrove. Job opportunities would need to be created.

Congestion/Traffic: The local road network is not considered to be suitable or safe to accommodate the additional demand generated by a development of 3,000 homes, with some predicting that the development could generate 6,000+ additional vehicles. Narrow rural lanes such as Frankley Lane, Church Hill and Egghill Lane are not suitable for large volumes of traffic.

Predicted severe congestion on Egghill Lane, Frankley Lane, Frankley Beeches Road, Ravenhayes Lane and roads to and including the A38 and M5 J3/J4.

Fear of rat-running through Rubery, Longbridge and Bartley Green.

Serval accident hotspots exist already including at Ravenhayes Lane/Church Hill/Frankley Hill Lane/Frankley Green Lane crossroads and Scotland Lane.

Infrastructure provision: Residents consistently state that existing local infrastructure cannot support a development of 3,000 homes. Significant infrastructure (see suggested infrastructure provision below) would need to be provided alongside dwellings. Some see the strain would be on Birmingham's infrastructure rather than Bromsgrove's infrastructure.

Schools (Mainstream): Surrounding primary and secondary schools are already oversubscribed and would not be able to accommodate 3,000 homes worth of pupils, with some concern that new residents would rely on stretched schools in Birmingham.

Biodiversity/Habitat/Wildlife: Concerns about the loss of habitats including for deer, badgers, bats, birds and foxes. The site and area around Bartley Reservoir functions as a wildlife corridor connecting Birmingham's parkland to surrounding farmland and open countryside.

Green Belt: Concerns raised about harm to the Green Belt and that development of the site would conflict with the purposes of the Green Belt, including sprawl and safeguarding the countryside from encroachment. Residents are concerned about urban sprawl to the south-west of Birmingham. Green Belt land is at the bottom of the hierarchy, and brownfield sites should be used as an alternative.

GPs/Healthcare: Local GP practices are noted to be at or beyond capacity with long waits to receive a doctors appointment already.

Public transport: Bus services in the area are very limited and irregular. The nearest train stations (Longbridge and Northfield) are ~3 miles away. Without significant investment in public transport, new residents will be car-dependent.

Flood risk: Development of the site would increase runoff into the Bartley Green Reservoir, affecting drinking water quality.

Utilities: Drainage/foul water capacity is believed to be already constrained with concerns about overstressed systems. In addition, there are concerns that a development of this scale would adversely affect water pressure in the area.

Standout / unique insights raised

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

- The proximity to Severn Trent Water's storage facilities and treatment plant warrants scrutiny. Water pipelines from the Elan Valley and the River Severn cross the site. This feeds the reservoir for drinking water in Birmingham and the surrounding area. Building works would risk damaging these pipes.
- Heritage: Development of the site threatens to encircle the Grade II* Church of St Leonard and Moated site of Frankley Hall.
- Recreation: The area is used for recreational activities such as walking and cycling through the open countryside. The proposed development would spoil views and the experience.
- Crime and policing: The surrounding area already has frequent occurrences of fly tipping. An increased population in the area would increase the amount of fly tipping. Some fear that the crime rate would increase in the area without investment. Emergency services are under sustained operational pressure and West Mercia Police would struggle to police this additional area. Edge of boundary struggles are highlighted between West Mercia and West Midlands police forces.
- Country Park: The suggestion of creating a country park near/around the reservoir is misleading, as such a space already exists and is actively enjoyed by the community.

Examples of suggested specific infrastructure requirements

- Road improvements: Upgrades to roads and junctions around the site including Egghill Lane, Frankley Lane, Church Hill, Frankley Beeches Road, Ravenhayes Lane/crossroads, junctions with the A38 and M5 (J3/J4). Additionally, road safety measures would need to be considered on the local road network.
- Public transport and active travel: New or extended bus routes with long-term funding. Safe walking/cycling routes connecting to Longbridge Train Station and other services/facilities.
- Education: New primary and secondary education provision would be required, with the suggestion that 3,000 houses would require 3-4 primary schools and a secondary school (or substantial off-site expansion).
- Healthcare: A new primary care centre with GP and dental services is requested.
- Utilities and drainage: Flood risk mitigation and sewerage infrastructure upgrades.
- Community/recreational facilities: A local centre to be provided on-site with shops, community centre, leisure facilities and sports pitches, safe play area and other recreational space.

By virtue of the scale of the proposed allocation of potentially 3,000 homes, residents are generally of the opinion that all types of infrastructure would need to be provided on-site. This includes new schools across all tiers, primary healthcare, public transport provision, active travel connections, road improvements, utilities and community facilities.

Statutory Consultees and Other Stakeholders

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

Parish Councils

Comments from other local community groups and parish councils are reflected in the public comments above. Parish Council comments have now been separated out for clarity.

Frankley Parish Council

Frankley Parish Council objects to the Draft Development Strategy at this stage, citing that the plan is premature, as it relies on an incomplete and outdated evidence base, particularly regarding Green Belt assessment.

Inadequate Evidence Base

- No up-to-date assessment identifying “grey belt” land (lower-value Green Belt suitable for development). Current site selections are therefore considered unjustified and potentially misleading.
- Concern that the Council has effectively identified “preferred options” without sufficient evidence.
- Request for future plan stages to use a complete, updated evidence base and reassess sites from scratch.

Concerns Over Site Selection (Frankley vs Alternatives)

- The proposed large allocation at Frankley is questioned, as other sites perform better in assessments.
- Suggested more suitable areas include land between the A435 and A441, with better infrastructure and fewer constraints.
- Highlights inconsistency and lack of transparency in site assessment methodology.
- Emphasis on directing growth to more sustainable locations (e.g. Hagley, Wythall) with:
 - Rail access
 - Existing services
 - Stronger infrastructure
- Reiterates importance of protecting Green Belt purposes and using lower-impact land first.

Scale and Impacts of Development at Frankley

- If development proceeds, it should be reduced in scale, avoiding sensitive central areas (e.g. heritage assets like St Leonard’s Church).
- Concerns include:
 - High harm to historic environment
 - Loss of high-quality agricultural land
- Allocation would be disproportionate and unfair, with a large share of the parish affected.

Infrastructure Deficit

- Frankley currently has very limited infrastructure:
 - No shops, schools, healthcare, or community facilities
- A large development would require:
 - New schools (approx. 3 primary schools for 3,000 homes)
 - Healthcare, retail, and community facilities
 - Utilities (water, sewerage, electricity, internet)

Additional constraints

- High-voltage power lines on site would be costly to relocate
- Poor public transport (limited bus service; rail stations approximately 3 miles away)
- Significant road infrastructure costs required
- Police and service capacity concerns raised.

Birmingham City Council, Children and Families Directorate (Education Infrastructure):

- The DfE-led rebuild of King Edward VI Balaam Wood School in Frankley is identified as an immediate and pressing issue because it sits within the FRA01 area, where 3,000 new homes are expected.
- The scale of proposed housing in FRA01 creates significant implications for future school capacity, meaning early input into planning decisions is essential.
- There is a need for early consideration of education planning linked to FRA01 so that the rebuild and future capacity planning for Balaam Wood School can properly align with projected demand.

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

- Request early engagement to ensure that the education impact of FRA01 is fully understood and integrated into strategic planning.

Birmingham City Council, Place, Prosperity & Sustainability Directorate:

- BCC raises significant cross-boundary concerns regarding FRA01, primarily related to infrastructure reliance, transport impacts, and integration with Birmingham's urban area, while also recognising opportunities for enhanced recreational access.
- Transport Assessments for FRA01 must assess impacts on Birmingham's transport network, including cumulative effects with:
 - Longbridge redevelopment
 - North Worcestershire Golf Course redevelopment
 - Druids Heath redevelopment (if approved)
- BCC states that it must be involved in the scoping of Transport Assessments for FRA01 to properly assess cross-boundary impacts.
- BCC requests further discussions specifically on the Frankley allocation, especially as Birmingham's own Local Plan progresses.
- BCC acknowledges that FRA01 may create opportunities to increase recreational access for Birmingham residents.

Bromsgrove Primary Care Network - Patient Participation Group:

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

CPRE:

- CPRE Worcestershire opposes the allocation of FRA01 for large-scale development. It should be removed from the plan.
 - FRA01 would cause major harm to:
 - Landscape
 - Green Belt
 - Amenity and recreation assets
 - Heritage
 - Nature conservation
 - Transport sustainability

Environment Agency:

Flood risk & water environment

- FRA01 contains an unmodelled ordinary watercourse within the site boundary, meaning the level of flood risk is unknown and may be higher than shown on standard Flood Zone mapping.
- Sites with unmodelled watercourses, including FRA01, may have reduced developable area once fluvial/surface water constraints are fully assessed.

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

- Because Flood Zone mapping does not include small catchments (<3 km²), the EA warns that although FRA01 may appear as Flood Zone 1, parts of the site may still be at significant flood risk and require further investigation.
- A future Strategic Flood Risk Assessment (SFRA) update must define functional floodplain (Zone 3b) and climate change impacts, which will apply to FRA01.

SuDS & Drainage

- FRA01 should be assessed for surface water (pluvial) flood risk with input from the Lead Local Flood Authority (LLFA).
- The EA notes that unmodelled watercourses like the one within FRA01 may affect site layout, masterplanning, and sequential test considerations, requiring SuDS solutions that can safely manage unknown/extreme flows.
- Future drainage design will need to align with outcomes of updated Water Cycle Study (WCS) relating to wastewater capacity, water efficiency, and water environment protections.

Ecology & BNG

- The EA response does not provide FRA01-specific ecological observations, but sets out general requirements applicable to this site:
 - All developments, including FRA01, should secure Biodiversity Net Gain (BNG) and contribute to blue/green infrastructure enhancements.
 - Development should protect and enhance water quality, with opportunities to support Water Framework Directive objectives through restoration or naturalisation of watercourses.
 - FRA01 will need to support measures consistent with the national requirement for 10% BNG and the emerging Local Nature Recovery Strategy (LNRS).

Historic England:

1. HE has strong concerns about the proposed allocation FRA01. The site contains multiple nationally significant heritage assets, including:

- Two Scheduled Monuments:
 - *Frankley Hall Moated Site*
 - *Standing cross in St Leonard's churchyard*
- The Grade II* listed church of St Leonard's

HE states it would be unlikely to support development on the scheduled monument areas.

2. Required Heritage Assessment

The Council must undertake further detailed assessment to:

- Establish the significance of the heritage assets
- Understand the impact of any development
- Assess how development would affect the wider landscape setting, including:
 - The moated site
 - Associated fishponds
 - Historic relationship with St Leonard's church

3. Description of Frankley Hall Moated Site

HE gives a detailed account of the moated site, noting:

- A rectangular island c. 80m x 60m, raised above ground level
- Buried structural remains of Frankley Hall, a major seat of the Littleton family
- A smaller gatehouse platform to the southwest, with ditches and hollowed areas
- Exceptional preservation, with:
 - Undisturbed archaeological deposits
 - Waterlogged environmental remains
 - Documentation from the 1530s to 1970s surveys

The site is described as a well-preserved, well-documented manorial complex.

4. Concerns About Deliverability

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

HE questions whether 3,000 dwellings (the Council's aspiration for FRA01) could be achieved without harming heritage assets:

- It is not clear how the site could be developed at the scale proposed
- The allocation may fail NPPF (para 203) on plan-making requirements
- It may conflict with:
 - Ancient Monuments and Archaeological Areas Act 1979
 - Planning (Listed Buildings and Conservation Areas) Act 1990

Therefore, they flag significant risk that FRA01 may be undevelopable as currently proposed.

5. HE Recommendations

- Further assessment is essential before progressing the allocation
- The Council must reconsider how (or whether) FRA01 can be developed
- HE seeks continued discussions with the Council due to the site's high sensitivity and national importance

NHS – Herefordshire and Worcestershire Integrated Care System:

- New housing in Bromsgrove District will significantly increase demand on healthcare services. Without developer-funded mitigation, health services will be unable to cope, making development unsustainable.
- The 9,280 additional homes proposed in the consultation document would lead to an estimated development population of 21,808 of which 9,377 would be new to the area. This would result in the following 43,142 additional patient events generated by population new to Worcestershire associated with the developments:
 - Emergency Department Attendances = 6,144
 - Emergency Admissions = 2,585
 - Elective Admissions = 210
 - Elective Day Case = 3,653
 - New Outpatient Appointments = 6,995
 - Follow-up Outpatient Appointments = 12,486
 - Maternity Care = 2,632
 - Diagnostic examination = 8,437

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

- 423 m² of new GP practice floorspace (Bromsgrove town)
- Potential new or expanded primary care facility
- Additional pharmacy capacity
- Larger or additional optometry premises
- Larger or additional dental premises
- Potential expansion of community hospital functions (diagnostics, neighbourhood health)
- Developer contributions toward Worcestershire acute hospital capacity
- Increased ambulance fleet, staffing, and possible hub expansion.

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

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

NHS Property Services Ltd:

- Health infrastructure must be treated as essential infrastructure in the Local Plan and funded proportionately by new development.
- New housing places pressure on primary care, community services, and wider NHS estate, requiring:
 - Developer contributions
 - Early planning for new or expanded facilities
 - Integration of NHS strategies within the Local Plan
- Calls for a clear process in determining health contributions, including:

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

- Assessing demand generated by proposals
- Understanding capacity of existing healthcare facilities
- Identifying options for increasing capacity and associated capital costs

National Grid Electricity Distribution (South West) Plc & National Grid Electricity Transmission (NGET):

- NGED does not object to the allocation of FRA01 for development. However, the Local Plan policy must acknowledge and retain the overhead lines in situ.
- The site's masterplan must be designed around the existing electricity infrastructure.
- The Kitwell 132kV circuit crosses the site. It includes a triple row of overhead high-voltage power lines, with 12 pylons running in parallel through the allocation.
- Early engagement with NGED to confirm the feasibility of retaining, diverting, or undergrounding the lines.
- Masterplans to be agreed with NGED before any outline planning application. Development layouts must accommodate the existing pylons and lines safely, incorporating the land beneath them into uses such as:
 - Open space
 - Green and blue infrastructure
 - Biodiversity net gain corridors
- FRA01 should proceed only with a masterplan that retains the 12-pylon high-voltage infrastructure, integrating it sensitively into the site layout.
 - Undergrounding 132kV circuits requires a 10m no-build corridor and restricts trees, roads, attenuation, and most structures.
 - Diversion/undergrounding involves significant cost, third-party land agreements, infrastructure impacts, and may reduce the developable site capacity.
 - Overhead lines are generally preferable and offer more flexibility for integrating development.

National Trust:

- The National Trust owns Frankley Beeches, an ancient woodland south of Egghill Lane, and ~2.4ha of land to the north side of Egghill Lane, both of which are inalienable. Inalienable land cannot be sold, transferred, or compulsorily purchased without approval from both Houses of Parliament. Part of the proposed allocation incorrectly includes inalienable NT land.
- The land included in FRA01 is also subject to an Agricultural Holdings Act (AHA) tenancy, further restricting any development.
- Requests that NT land be removed from the FRA01 allocation.
- Frankley Beeches is described as a significant visual landmark, with long-distance views to the Cotswolds, Dudley, Leicestershire, Shropshire, the Wrekin, and North Cleve. Development within FRA01 would cause "unprecedented change" to views from Frankley Beeches due to proximity, though long-distance views will remain because the land drops away northwards. The Landscape & Visual Sensitivity Assessment identifies Frankley Beeches (parcel B01) as high/medium sensitivity to housing, reinforcing the need for mitigation.
- NT accepts that development could be acceptable if building is restricted to lower elevations, with green infrastructure reserved for upper slopes to protect views.
- NT highlights an opportunity for the FRA01 allocation to deliver safe pedestrian crossing improvements on Egghill Lane to enhance access to Frankley Beeches.
- NT strongly recommends exploring improved access as part of the Regional Park and expresses willingness to work with the Council and developer.

Natural England:

The Frankley allocation is acceptable and does not impact any protected sites or landscapes, and therefore raises no environmental objections at this stage.

North Worcestershire Water Management:

Flood risk & water environment

- FRA01 lies mainly within Flood Zone 1, indicating low fluvial flood risk, but the Environment Agency's fluvial model does not cover the site, meaning the true risk may be higher and additional fluvial modelling is required as part of a future Flood Risk Assessment.

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

- The site sits predominantly in the headwaters of the Rae catchment, with the north-west parcel draining into Illey Brook (a tributary of the River Stour).
- Several surface water flow routes cross the site, associated with field ditches. These must be accounted for in the site layout.
- There are no recorded flood incidents, but as the land is undeveloped, this does not confirm absence of past flooding.
- All ditches and ponds must be retained and given a suitable undeveloped buffer.

SuDS & Drainage

- A comprehensive site-wide drainage strategy is required and must adhere to the 2025 Defra National Standards for SuDS. This includes:
 - Rainwater harvesting for non-potable use.
 - Above-ground multifunctional SuDS features.
 - Water-quality treatment measures.
- If development is phased, an overall SuDS strategy must be prepared to ensure compliance across all phases.
- Soilsmap indicates the site likely has slightly impeded drainage, so infiltration SuDS may not be viable; site-specific ground investigation will be required to confirm feasibility.
- Any redundant culverts in the ditch network should be removed.

Ecology & BNG

- Watercourses, ditches, and ponds within FRA01 are likely to be of high ecological distinctiveness, meaning:
 - They require a River Condition Assessment undertaken by a qualified/accredited surveyor.
 - The riparian zone (10m from bank top) must be included in surveys and safeguarded from encroachment.
 - Biodiversity Net Gain (BNG) units associated with these features must be delivered on-site.
- The site should incorporate robust blue/green corridors to support ecological connectivity.
- Natural infrastructure such as on-site BNG, watercourse enhancement and removal of culverted sections is supported.

Severn Trent Water:

- STW has identified a site at the south-eastern corner of FRA01 for a new covered reservoir, adjacent to the existing Frankley Water Treatment Works (WTW).
- STW requests that Bromsgrove District Council removes the south-eastern corner of the allocation to safeguard the land for essential water infrastructure.
- This site is the only operationally viable location due to:
 - Essential topographical and hydraulic requirements (gravity-fed system).
 - Functional linkage to Frankley WTW.
- STW states the reservoir is essential to:
 - Meet statutory obligations under the Reservoirs Act.
 - Accommodate increasing potable water demand.
 - Ensure long-term resilience in the regional water supply network.

Sport England:

- Given the scale of the site there is likely to be a need for on site sports provision, this should be informed by both Bromsgrove District Council and Birmingham City Council strategic sporting evidence base documents.

Stratford on Avon District Council:

- FRA01 – Land at Frankley is identified as the largest proposed allocation in Bromsgrove's Draft Development Strategy.
- Its selection reflects evidence that growth along the northern edge of Bromsgrove District, adjoining the West Midlands conurbation, is highly sustainable and accessible.
- The site's connectivity to Bartley Green and Egghill (outside Bromsgrove District) is highlighted as a key reason for its suitability.

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

- FRA01 is also noted as a candidate location for addressing unmet housing need from the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) due to its sustainability and position along the boundary.
- Additional sites along the conurbation edge have been assessed, but FRA01 is emphasised as the principal and most substantial proposed allocation in this strategic area.

WCC Education:

Frankley:

- Holywell Primary, Waseley Hills High
- Early Years = 330 FTE (Full Time equivalent), Primary = 146 PYG (Per Year Group), Secondary = 129 PYG
- Primary = 4.9 FE (Form Entry) (5) new provision required, Secondary = 4.3 FE potential solution is subject to detailed assessment including neighbouring authorities

WCC Planning & Transport Planning:

Archaeology & Historic Landscape

- High potential impact on the historic landscape character of local significance, contributing to its categorisation as a sensitive site.
- Further archaeological/historic landscape assessment is recommended before determining any planning application, to inform mitigation and design.

Landscape

- Development would cause coalescence of the existing urban areas around Frankley, enclosing a peri-urban landscape including the Bartley and Frankley reservoirs.
 - The landscape is distinctive, characterised by:
 - Historic enclosure patterns
 - Hedgerows
 - Scattered mature oak trees, which have significant landscape and biodiversity value and should not be lost.
- The site's large-scale field pattern creates opportunities for:
 - Integrating new development within the existing landscape fabric
 - Enhancing hedgerows, trees and green corridors
 - Creating a network of permeable Green Infrastructure (GI) throughout the development.
- Avoid high densities at settlement edges to maintain a proper urban–rural transition.

Ecology

- FRA01 should include large, contiguous habitat areas as part of its GI provision.
- The Draft LNRS identifies potential for a large area of species-rich neutral grassland at the centre of the site—this could form part of a country park.
- FRA01 is adjacent to:
 - Raven Hills Wood Local Wildlife Site (LWS)
 - Bromwich Wood Local Nature Reserve.
- Due to proximity to sensitive ecological receptors, the site requires a minimum 50m buffer of semi-natural habitat to protect them from:
 - Increased footfall
 - Artificial light at night
 - Noise, dust and litter
 - Other urbanisation pressures.

Worcestershire Regulatory Services:

Contaminated Land

This large area contains a number of potential contaminated land sites. An area of former railway land is shown to cross the parcel in the south east. An area of Sewage (Works) reference BD/S157100018224 is also shown adjacent to the south eastern slither of the site. A number of features referred to as former pits and quarries and unknown filled ground are also shown within the central area of the site. A large former fishpond is highlighted in the towards the eastern side of the central area of the site. It is not clear when this feature was infilled but is no

Statutory Consultees and Other Stakeholders:

Frankley & FRA01 – Key Points

longer shown on modern satellite images. Frankley Services is shown offsite to the northwest of the site and Electricity Production and Distribution offsite to the very north (ref BD/S115100010303).

Nuisance/Noise

The site located to the east of the M42 and areas particularly NW boundary may be subject to road noise. Will require noise assessment but not significant for development

Air Quality

Large development, full AQA needed.

Worcestershire Wildlife Trust:

Worcestershire Wildlife Trust considers FRA01 a high-risk, large-scale allocation with significant potential ecological constraints, including:

- Possible priority habitats
- Multiple Local Wildlife Sites
- Likely protected species
- Need for substantial Green & Blue Infrastructure

The Trust's support is conditional, requiring much more detailed ecological evidence before FRA01 could be considered a sound or deliverable allocation.

Developers/Landowners

Developers/Landowners:

FRA01 Site Promoters – Key Points

Harris Lamb obo Bloor Homes Western (Site 176)

- Support proposed allocation of FRA01 as site is sustainable and highly accessible location which can deliver major social and physical infrastructure. Site also offers unique recreation opportunities linked to Bartley Reservoir, differentiating it from other urban edge options.
- Local plan vision should be separate and more compliant with NPPF as current Council vision does not adequately reference housing need, infrastructure or environmental protection. Local plan vision should also acknowledge Bromsgrove's role in meeting GBBCHMA needs.
- Overall housing requirement is too low as standard method figure should be treated as minimum. No uplift has been applied for affordable housing needs, economic growth, or wider HMA unmet needs.
- Plan period should go beyond 2043 to meet minimum requirement for 15 years post-adoption.
- FRA01 will deliver significant social infrastructure, public transport and active travel, and environmental and green infrastructure benefits.
- Council's assessment of potential Green Belt harm is overstated. Heritage impacts on site can be managed, as well as other identified constraints.

Lichfields obo UKLD (Investments) Ltd (Site 232)

- Specific local plan vision is required that acknowledges need to assist with unmet needs of GBBCHMA and aligns with NPPF. Plans must be positively prepared and meet the duty to cooperate.
- Support DDS distribution strategy Option A, in particular development to the north of the district adjacent to the conurbation as a sustainable and accessible location that aligns with the STA findings.
- More evidence required to make the strategy sound, including updated SA, revised HEDNA, updated Green Belt assessment and further regional unmet housing need analysis.
- Site proposed is suitable for inclusion in wider FRA01 allocation as in a highly sustainable location and is largely unconstrained.
- Site should be classed as Grey Belt and would be an insignificant loss to overall Bromsgrove Green Belt. Support the Council's conclusion that exceptional circumstances exist to justify Green Belt release.
- FRA01 will require significant new infrastructure however should also be noted that location already benefits from strong nearby services.

Fisher German obo Severn Trent Water (Site 176 – in part)

- A new covered reservoir is required to expand storage capacity at Frankley Water Treatment Works (WTW). Necessary to meet growing regional demand, comply with statutory duties, and ensure long-term operational resilience.
- Land south-east of Frankley WTW is only viable location due to essential topography for gravity fed water flows and the need to be directly functionally linked to existing WTW.
- A small part of proposed FRA01 allocation boundary overlaps with land required by STW for new reservoir – therefore request that allocation boundary is amended to exclude this land.
- Accommodating future water infrastructure in this location would in any case be consistent with NPPF (para 20, 2024) which requires strategic plans to make provision for water supply infrastructure.
- Early advice suggests reservoir could be acceptable development in the Green Belt and a full planning application is in progress for submission in 2026.

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

Developers/Landowners:
Settlement-wide (other Frankley Site Promoters) – Key Points
No additional site promoter representations were received for sites in the Frankley area (on the edge of the settlement/conurbation boundary).

Conclusion

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

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

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