

Bromsgrove District Plan 2011 – 2030 Proposed Submission Version

Representation Period 30 September to 11 November 2013

Representations by the South Worcestershire Councils (SWC) comprising of Malvern Hills District Council; Worcester City Council; and Wychavon District Council.

General comments

The SWC welcome the opportunity to respond to the proposed submission Bromsgrove District Plan (BDP). The SWC have been made aware of and kept informed on progress in the preparation of the BDP through the Worcestershire Planning Officers Group and the commissioning of a joint countywide Worcestershire Strategic Housing Market Assessment (SHMA). The SWC have responded separately on the Duty to Cooperate consultation in September 2013 and are content that this test has been met. The joint working between Bromsgrove District Council and Redditch Borough Council to accommodate the housing needs of the latter is noted and supported. The SWC look forward to continuing to share information and progress on our respective Development Plans and Community Infrastructure Levy (CIL) work.

62/1

SWC note and support there is no requirement to meet the housing needs of Bromsgrove or Redditch in the submitted South Worcestershire Development Plan (SWDP) area and that their plans should set out a clear policy hook which would allow the housing needs of Birmingham to be considered once identified.

It is noted that the BDP makes reference to a Green Belt Review prior to 2023. The SWDP is committed to a review of the plan for 2019-2020 that may lead to the SWDP requiring addressing unmet need from the conurbation that may 'leapfrog' the Green Belt and Bromsgrove District. Therefore it is suggested that a more positive statement is made in the BDP that includes having regard to the establishment of future housing needs and capacity within the Green Belt and Greater Birmingham and Solihull Local Enterprise Partnership area having regard to sustainable options that reduce long distance commuting. It is suggested that consideration is given to including a full review of the BDP informed by evidence generated through a comprehensive Green Belt Review or study.

62/2
BDP4

Vision and Strategic Objectives

The SWC support the vision and objectives of the BDP that seek to foster economic growth, support local communities in terms of housing and services and deliver overall sustainable development objectives. The vision for the north of Worcestershire by 2030 accords with the goals of the SWDP, and together support the overall pattern of change for the southern and northern parts of the county.

62/3

Development Strategy

The SWC support the Sustainable Development Principles and Settlement Hierarchy set out in the BDP as well as the housing requirement of 7,000 dwellings to 2030. Particularly since the latter draws on the same 2012 Worcestershire SHMA study that underpins the SWDP development strategy.

Specific comments relate to:

62/4

BDP5A) Bromsgrove Town Expansion Sites

It is recognised that the direction of development is severely constrained by the Green Belt and that the three urban extensions, delivering a minimum of 2,106 dwellings between them, around the town represent the only deliverable option open to the plan. These sites are located and of a scale to deliver sustainable development, in terms of proximity to existing services and facilities as well as the capacity to provide additional infrastructure for the town, and in this respect are seen positively by the Sustainability Appraisal (SA) in terms of reducing vehicle journeys and access to the town centre. Therefore the SWC support the strategic housing allocations at Bromsgrove.

62/5

BDP5B) Other Development Sites

Wagon works/St Godwalds Road – 181 dwellings

This is the proposed development site located closest to Wychavon district and therefore having a potential impact on the villages of Wychbold and Upton Warren. However, it is noted that this site already has outline planning permission and that the SA is broadly supportive of the proposal maintaining that the site is in close proximity to services and facilities in Bromsgrove as well as the railway station. It is possible that this development may lead to an increase in traffic and associated environmental impacts for the adjoining parishes in Wychavon. However, as the principle of development has already been accepted through the granting of permission and the absence of any impacts identified in the SA the SWC have no objection to the proposed allocation.

62/6

RCBD1 Redditch Cross Boundary Development

xB067/1

Brockhill and Foxlydiate – 3,470 dwellings

In accordance with the NPPF/legislative requirement to enter into a Duty to Cooperate the BDP has identified in the plan sites to accommodate a proportion of Redditch growth at the above sites.

The sites are both in areas of low flood risk, although the SA/Strategic Flood Risk Assessment both identify the risk from the development of aggravating flooding downstream, although acknowledge that these can be mitigated through on-site measures.

It is noted the Environment Agency (EA) have commented on the previous stages of the drafting process and the SWC would reiterate that the main issue is to ensure that any proposed development in all the locations identified above do not act to increase flood risk elsewhere by increasing surface water run-off rates/volumes from the sites post development (or during construction). The SWC endorse the EA advice that a surface water drainage strategy should be produced for each development site using a Sustainable Drainage (SuDS) based approach to ensure that, as a minimum, greenfield run-off rates are maintained post development including the impacts of climate change on peak rainfall intensity. Opportunities for flood risk betterment should also be considered.

The SWC acknowledge that the policies RCBD1 (and Water Management Policy BDP23) are appropriately worded with respect to flood mitigation and alleviation. Therefore the SWC are of the view in this instance that appropriate policy provisions can be put in place at strategic level to ensure that the proposed development sites do not act to increase flood risk elsewhere in the SWDP plan area. Clearly these policy elements need to be stringently implemented within any future masterplan for the sites and when the schemes eventually come forward as a planning application. The SWC will be seeking assurances at the time that this will be the case.

Detailed comments on the proposed cross boundary allocation: The SWC would expect that detailed discussions are held with the key infrastructure, services and utility providers in bringing these allocations forward. In particular the capacity of the sewage infrastructure and any new, or upgrade to existing sewage treatment (i.e. at Crowle), as well as the possibility of flood impact from water courses on these facilities need to be fully explored with Severn Trent Water Ltd.

No Place like Home

62/7
BDP10

The SWC support the policies in this section of the plan. However it is suggested that the pejorative phrase "Elderly" is removed from Policy BDP10 and replaced with "... Older People".

62/8
BDP11

The SWC note the intension to deal with the future needs of Gypsies, Travellers, and Travelling Showpeople (Policy BDP11) in the light of the findings of the Gypsy and Travellers Accommodation Assessment (GTAA) update to be published in 2013/14, and a review of the Green Belt in terms of identifying potential sites. Elsewhere the BDP refers to a review of the Green Belt anytime before 2023, however it would be expected that Bromsgrove District Council will respond to any unmet need revealed by the GTAA within a reasonable time period over the first half of the plan period.

Let's do Business

- 62/9 BDP13
 - 62/10 BDP14
 - 62/11 BDP15
 - 62/12 BDP16
- The SWC support the policies in this section of the plan as they mirror the employment led development strategy of the SWDP. In terms of economic development there are no new employment sites identified in the plan that would have a negative impact on the delivery of the SWDP employment strategy.

The One and Only Bromsgrove

- 62/13 BDP17
 - 62/14 BDP18
 - 62/15 BDP19
 - 62/16 BDP20
 - 62/17 BDP21
- The SWC support the policies in this section of the BDP and the aspiration to regenerate the town centre, deliver high quality design and manage/safeguard the environment.

Clean, Green and Healthy

- 62/18 BDP22
 - 62/19 BDP23
 - 62/20 BDP24
 - 62/21 BDP25
- The SWC support the policies in this section. Policy BDP24 Green Infrastructure is supportive of the countywide Green Infrastructure Strategy and compliments the corresponding policy in the SWDP to ensure a holistic approach to delivering Green Infrastructure improvements across the county.

Implementation and monitoring

The SWC note the statements relating to the Infrastructure Delivery Plan set out in this section.

AFF

7/11/2013

PP219

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Mike Dunphy
Strategic Planning Manager
Planning & Regeneration
Bromsgrove District Council
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Bromsgrove
Worcestershire B60 1AA

7 November 2013

Dear Mike

Bromsgrove District Plan 2011- 2030 Proposed Submission Version – September 2013. Representations on behalf of the South Worcestershire Councils

Please find attached the representations on behalf of the South Worcestershire Councils (Malvern Hills District Council; Worcester City Council; Wychavon District Council). The SWC response is generally supportive of the proposed submission Bromsgrove District Plan and considered that the plan is both legally compliant and meets the Tests of Soundness.

Should you have any queries on the content of the attached response please raise them directly with my colleague Andrew Ford, otherwise the SWC look forward to being notified in due course of the next stages in the process towards eventual adoption.

Yours sincerely,

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