



# Bromsgrove District Plan

## Sustainability Appraisal of Different Growth Levels

February 2014



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## **1. Introduction**

- 1.1 This document comprises of an assessment of the effects of different levels of housing growth against sustainability objectives. This Sustainability Appraisal (SA) supplements the SA undertaken against the Proposed Submission Version of the Bromsgrove District Plan.
- 1.2 The Council began work on a new Plan in 2005 and since this time a range of different housing targets have been considered by the Council. It is considered pertinent to test both high and low levels of growth so the sustainability impacts can be fully understood. The Council has opted to test the following growth levels:
- 2,100
  - 4,000
  - 7,000
  - 9,600; and
  - 10,500
- 1.3 The performances against the sustainability objectives will then be compared to identify which level of growth is likely to have the greatest positive impact.

## **2. Assessment of Effects**

2.1 This section presents the findings of the assessment of the different growth levels. The assessment matrices are presented in Appendix A, and a summary description of the key findings given below.

### **2.2 Target of 2,100**

2.3 This modest figure was set out in the Preferred Options Document of the Phase 2 Revision of the West Midlands Regional Spatial Strategy (RSS). This figure reflected the over-provision in the district prior to 2006 and also the intention of the RSS to deliver urban renaissance.

### **2.4 Key Strengths**

2.5 This low level of growth would be likely to have very limited environmental impact. For example, no Green Belt land would need to be developed and a number of Areas of Development Restraint (ADRs) could be retained minimising the use of greenfield land. A reasonable proportion of development could therefore occur on brownfield land. With this level of growth there is unlikely to be any notable harm to biodiversity, landscapes or the historic environment.

### **2.6 Key Weaknesses**

2.7 The social and economic benefits of this scale of development would be severely limited. The level of affordable housing provided would be well below the level required to meet identified needs. In addition, if the demand for housing significantly exceeds supply there could be a rise in prices which would make homeownership more unaffordable in the district.

2.8 Such a low level of housing construction would hamper economic growth in the district. It may be difficult to attract inward investment making it

challenging for the new technology sector to grow. A lack of population growth could reduce the size of the workforce and hamper the development of a knowledge driven economy.

## **2.9 Target of 4,000**

2.10 This is the figure suggested by the Council at the Examination in Public (EIP) of the Phase 2 Revision of the RSS. The Panel endorsed the figure and considered it appropriate to recommend it as the initial allocation for the district.

## **2.11 Key Strengths**

2.12 This level of growth could deliver some modest social benefits. There would be a moderate level of affordable housing provision. Also assuming the ADR sites were developed a high proportion of development would occur in Bromsgrove Town. This increase in population could boost the vitality and viability of the Town Centre.

2.13 The level of environmental harm would be limited as no release of Green Belt land would be required. Also the ADR sites were carefully chosen to ensure that there was no notable impact on natural landscapes and the historic environment.

## **2.14 Key Weaknesses**

2.15 A high proportion of development would occur on greenfield land which could harm biodiversity and geodiversity.

2.16 This moderate level of housing growth is unlikely to provide a notable boost to the economy as it recovers from the recession. This will not help develop the knowledge driven economy or support growth in new technology sectors.

## **2.18 Target of 7,000**

2.19 This target is derived from the 2012 Worcestershire Strategic Housing Market Assessment (SHMA). The SHMA test a range of scenarios to identify possible levels of growth for Bromsgrove District. Most relevant is the migration-led scenario that identified a need for 6,980 dwellings over the plan period. To provide a logical target this has been rounded up to 7,000.

## **2.20 Key Strengths**

2.21 This level of growth could deliver some significant social benefits. There would be a high level of affordable housing provision. This level of growth could lead to significant development in Bromsgrove Town and all the large settlements. This increase in population could boost the vitality and viability of the Town Centre and a number of local centres.

2.22 There could be notable economic benefits of delivering 7,000 homes over the plan period. This increase in house building levels could provide a boost to the economy attracting inward investment into the district and potentially leading to growth in the new technology sector.

## **2.23 Key Weaknesses**

2.24 There are very limited levels of brownfield land available in the district and therefore a target of 7,000 requires a high proportion of greenfield development and also the removal of some land from the Green Belt. This means that this level of growth does not perform well against some environmental objectives. The high level of greenfield development could have some impact on biodiversity and geodiversity whilst also potentially harming landscape character and quality.

## **2.25 Target of 9,600**

2.26 This figure is taken from the study undertaken by Nathaniel Lichfield and Partners which considered the possibility of higher growth levels across the

West Midlands. The report was completed to inform the examination of the Phase 2 Revision of the West Midlands RSS. Of the 3 potential scenarios 9,600 was the highest.

## **2.27 Key Strengths**

2.28 This level of growth could deliver some significant social benefits. There would be a high level of affordable housing provision. This level of growth could lead to significant development in Bromsgrove Town and all the large settlements. This increase in population could boost the vitality and viability of the Town Centre and a number of local centres.

2.29 There could be notable economic benefits of delivering 9,600 homes over the plan period. This increase in housing building levels could provide a boost to the economy attracting inward investment into the district and potentially leading to significant growth in the new technology sector.

## **2.30 Key Weaknesses**

2.31 There are very limited levels of brownfield land available in the district and therefore a target of 9,600 requires a huge amount of greenfield development and also the removal of a significant amount of land from the Green Belt. This means that this level of growth performs very poorly against some environmental objectives. The very high level of greenfield development could have a significant impact on biodiversity and geodiversity whilst also potentially causing significant harm to landscape character and quality. Such large amounts of development also increase the possibility of a harmful impact on the historic built environment in a number of settlements.

## **2.32 Target of 10,500**

2.33 This figure is taken from the study undertaken by Edge Analytics entitled 'North Worcestershire Demographic Forecasts' (February 2014). This tests a wide range of demographic and economic-led scenarios and further sensitivity

analysis to provide more robust outcomes. The scenario based on forecasts produced by Oxford Economics produced the highest housing target which was around 10,500 when some sensitivity testing was undertaken.

### **2.34 Key Strengths**

2.35 This level of growth could deliver some significant social benefits. There would be a high level of affordable housing provision. This level of growth could lead to significant development in Bromsgrove Town and all the large settlements. This increase in population could boost the vitality and viability of the Town Centre and a number of local centres.

2.36 There could be notable economic benefits of delivering 10,500 homes over the plan period. This increase in housing building levels could provide a boost to the economy attracting inward investment into the district and potentially leading to significant growth in the new technology sector.

### **2.37 Key Weaknesses**

2.38 There are very limited levels of brownfield land available in the district and therefore a target of 10,500 requires a huge amount of greenfield development and also the removal of a significant amount of land from the Green Belt. This means that this level of growth performs very poorly against some environmental objectives. The very high level of greenfield development could have a significant impact on biodiversity and geodiversity whilst also potentially causing significant harm to landscape character and quality. Such large amounts of development also increase the possibility of a harmful impact on the historic built environment in a number of settlements. There is also a concern that the major increases in construction and higher population growth would greatly increase vehicle usage thereby leading to a reduction in air quality.



### 3. Comparing Growth Levels

3.1 It is important to compare the performance of different growth levels to not only help identify the most appropriate growth option but also to highlight where certain growth levels do not perform so well against particular types of objectives.

3.2 To undertake this comparison the following scoring system has been used:

++ = 2

+ = 1

0/? = 0

- = -1

-- = -2

3.3 The outcome of applying this scoring system is highlighted in the table below:

Growth SA	2,100	4,000	7,000	9,600	10,500
<b>SOCIAL OBJECTIVES</b>					
SO1	0	1	2	2	2
SO2	0	0	0	0	0
SO3	0	1	2	2	2
SO4	0	0	0	0	0
SO5	1	1	1	1	1
SO6	0	0	0	0	0
<b>sub total</b>	<b>1</b>	<b>3</b>	<b>5</b>	<b>5</b>	<b>5</b>
<b>ENVIRONMENTAL OBJECTIVES</b>					
EV1	0	-1	-1	-2	-2
EV2	1	0	-1	-2	-2
EV3	0	0	-1	-2	-2
EV4	0	0	0	-1	-1
EV5	0	0	0	0	0
EV6	0	0	0	0	0
EV7	0	0	0	0	0
EV8	0	0	0	0	-1
EV9	0	0	0	0	0
<b>sub total</b>	<b>1</b>	<b>-1</b>	<b>-3</b>	<b>-7</b>	<b>-7</b>
<b>ECONOMIC OBJECTIVES</b>					
EC1	-1	0	1	2	2
EC2	-1	0	1	2	2
EC3	0	0	0	0	0
<b>sub total</b>	<b>-2</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>4</b>
<b>Grand Total</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>2</b>	<b>1</b>

Table A: Comparison of Assessment of Different levels of Growth against SA Objectives

3.4 Table A identifies that the figure of 7,000 performs best against the SA objectives. In particular it performs well against both social and economic objectives. The lower levels of growth (2,100 and 4,000) have a stronger performance against environmental objectives due to the loss of lower levels of greenfield land. However, these lower levels of growth do not provide sufficient housing to deliver notable social or economic benefits. By contrast the highest levels of growth (9,600 and 10,500) deliver significant social and economic benefits but this is outweighed by environmental harm caused by releasing large amounts of both greenfield and Green Belt land.

## **4. Conclusions**

- 4.1 This report constitutes an assessment of a range of different growth levels throughout the evolution of the Bromsgrove District Plan. Each level of growth has been assessed individually and the sustainability outcomes compared. Overall, it is considered that the growth level of 7,000 performs best due to its excellent performance against social and economic objectives. It has been identified that lower levels of growth would deliver much more limited social and economic benefits whilst the highest growth figures would potentially cause significant environmental harm. It is therefore recommended that the figure of 7,000 is incorporated in the Bromsgrove District Plan.

## Appendix A

### Assessment Matrices

2100 Target		
SA Objectives	SA Effects	Commentary
<b>Social Objectives</b>		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	0	Some affordable housing would be delivered but it would be wholly insufficient to meet needs. Such a disparity between supply and demand would also potentially lead to increases in the price of market housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	The level of growth has no direct effect on this objective. Policies in the plan will ensure that infrastructure is delivered and development is well located to ensure the health and well-being of the population is not harmed
SO3 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	0	Such a low levels of development is unlikely to enhance the vitality or viability of centres in the district.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The level of growth has no direct effect on this objective.
SO5 Increase sustainable travel choices and move towards more	+	Policies in the plan will ensure that development is in located in sustainable locations with sufficient transport infrastructure. Regardless of scale, there should be a positive impact against this objective.

2100 Target		
SA Objectives	SA Effects	Commentary
sustainable travel patterns		
SO6 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	0	The level of growth has no direct effect on this objective
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	0	The low level of growth would limit the amount of greenfield development where the biodiversity and geodiversity issues are likely to be greater.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	+	A target of 2,100 would mean Green Belt release would not be required and a number of greenfield ADR sites would not be released for development. A higher proportion of development could occur on previously developed land.
EV3 Safeguard and strengthen landscape and townscape character and quality	0	The low level of greenfield land required is unlikely to have a noticeable impact upon landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality	0	It is the location of development rather than the amount of development that will impact on the historic environment. With such a low target the chance of a harmful impact on the historic environment is reduced.

2100 Target		
SA Objectives	SA Effects	Commentary
built environment in new development proposals.		
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	There are no clear links between the amount of housing growth and waste management
EV6 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	0	The level of growth has no direct effect on this objective. The location of development will be relevant but can be addressed by water management techniques such as SuDs, recycling and other innovative methods.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The level of growth has no direct effect on this objective.
EV8 Protect and enhance the quality of water, soil and air	0	Low levels of housing building are unlikely to impact on the quality of water, soil and air.
EV9 Reduce causes of and adapt to the impacts of climate change	0	The level of growth has no direct effect on this objective.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	-	Such low levels of growth may fail attract inward investment and there may be an insufficient local workforce for the number of jobs available.
EC2 promote and support the	-	A figure of 2,100 is unlikely to stimulate employment growth and could therefore harm the growth of the new technology sector.

2100 Target		
SA Objectives	SA Effects	Commentary
development of new technologies of high value and low impact especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The level of housing growth is unlikely to affect educational opportunities.

4000 Target		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	+	A reasonable amount affordable housing would be delivered if a target of 4,000 was proposed this would be unlikely to fully meet the need. A target set below the full objectively assessed need could potentially lead to increases in the price of market housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	The level of growth has no direct effect on this objective. Policies in the plan will ensure that infrastructure is delivered and development is well located to ensure the health and well-being of the population is not harmed
SO3 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	+	A target of 4,000 would require the use of ADR sites for development. A significant proportion of development would therefore be within Bromsgrove Town and therefore the vitality and viability of the Town Centre could be enhanced.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The level of growth has no direct effect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Policies in the plan will ensure that development is in located in sustainable locations with sufficient transport infrastructure. Regardless of scale, there should be a positive impact against this objective.



4000 Target		
SA Objectives	SA Effects	Commentary
SO6 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	0	The level of growth has no direct effect on this objective
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	-	A target of 4,000 would require a high proportion of greenfield development and therefore some impact on biodiversity and geodiversity is likely.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	0	A target of 4,000 would mean Green Belt release would not be required although ADR sites would need to be released for development. The development of these sites would result in the loss of some high quality agricultural land.
EV3 Safeguard and strengthen landscape and townscape character and quality	0	A target of 4,000 would lead to the release of ADR sites that are greenfield. These sites were carefully selected through the local plan process to minimise the impact upon landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	It is the location of development rather than the amount of development that will determine the impact of on the historic environment. It is considered that the ADR sites can be developed without a notable impact on the historic environment.

4000 Target		
SA Objectives	SA Effects	Commentary
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	There are no clear links between the amount of housing growth and waste management
EV6 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	0	The level of growth has no direct effect on this objective. The location of development will be relevant but can be addressed by water management techniques such as SuDs, recycling and other innovative methods.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The level of growth has no direct effect on this objective.
EV8 Protect and enhance the quality of water, soil and air	0	Building 4,000 homes is unlikely to impact on the quality of water, soil and air.
EV9 Reduce causes of and adapt to the impacts of climate change	0	The level of growth has no direct effect on this objective.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	0	Moderate levels of growth may only have a negligible impact on the economy as it recovers from the recession. Further growth may be needed to attract significant inward investment.
EC2 promote and support the development of new technologies of high value and low impact	0	A figure of 4,000 is may stimulate very limited employment growth but in reality this may be insufficient to stimulate noticeable growth in the new technology sector.

4000 Target		
SA Objectives	SA Effects	Commentary
especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The level of housing growth is unlikely to affect educational opportunities.

7000 Target		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	A target of 7,000 would deliver a significant amount of affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	The level of growth has no direct effect on this objective. Policies in the plan will ensure that infrastructure is delivered and development is well located to ensure the health and well-being of the population is not harmed
SO3 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	++	A target of 7,000 would lead to notable growth in both Bromsgrove Town and the large settlements. It is therefore considered that the vitality and viability of the Town Centre and other local centres could be enhanced.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The level of growth has no direct effect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Policies in the plan will ensure that development is in located in sustainable locations with sufficient transport infrastructure. Regardless of scale, there should be a positive impact against this objective.

7000 Target		
SA Objectives	SA Effects	Commentary
SO6 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	0	The level of growth has no direct effect on this objective
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	-	A target of 7,000 would require a high proportion of greenfield development and therefore some impact on biodiversity and geodiversity is likely.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	-	A target of 7,000 would result in the loss of greenfield and Green Belt land for development. The development is likely to result in the loss of some high quality agricultural land.
EV3 Safeguard and strengthen landscape and townscape character and quality	-	The loss of a significant amount of greenfield land could harm landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	0	It is the location of development rather than the amount of development that will determine the impact of on the historic environment. It is considered that the ADR sites can be developed without a notable impact on the historic environment. Beyond this it is considered that a further 2,400 homes can be identified can be identified through a Green Belt Review without having a significant impact on the historic environment.

7000 Target		
SA Objectives	SA Effects	Commentary
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	There are no clear links between the amount of housing growth and waste management
EV6 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	0	The level of growth has no direct effect on this objective. The location of development will be relevant but can be addressed by water management techniques such as SuDs, recycling and other innovative methods.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The level of growth has no direct effect on this objective.
EV8 Protect and enhance the quality of water, soil and air	0	Building 7,000 homes is unlikely to impact on the quality of water, soil and air.
EV9 Reduce causes of and adapt to the impacts of climate change	0	The level of growth has no direct effect on this objective.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	+	It is considered that this level of growth would lead to a significant increase in house building which could boost the economy as it recovers from the recession. This could attract inward investment.
EC2 promote and support the development of new technologies of high value and low impact	+	A figure of 7,000 is likely to stimulate employment growth and could potentially lead to growth in the new technology sector.

7000 Target		
SA Objectives	SA Effects	Commentary
especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The level of housing growth is unlikely to affect educational opportunities.

9,600 Target		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	A target of 9,600 would deliver a significant amount of affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	The level of growth has no direct effect on this objective. Policies in the plan will ensure that infrastructure is delivered and development is well located to ensure the health and well-being of the population is not harmed
SO3 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	++	A target of 9,600 would lead to notable growth in both Bromsgrove Town and the large settlements. It is therefore considered that the vitality and viability of the Town Centre and other local centres could be enhanced.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The level of growth has no direct effect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Policies in the plan will ensure that development is in located in sustainable locations with sufficient transport infrastructure. Regardless of scale, there should be a positive impact against this objective.



9,600 Target		
SA Objectives	SA Effects	Commentary
SO6 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	0	The level of growth has no direct effect on this objective
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	--	A target of 9,600 would require extremely high levels of greenfield development and therefore it is likely that there could be a significant impact on biodiversity and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	--	A target of 9,600 would result in the loss of a large amount of greenfield and Green Belt land for development. The development is likely to result in the loss of some high quality agricultural land.
EV3 Safeguard and strengthen landscape and townscape character and quality	--	The loss of a significant amount of greenfield land could harm landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	-	It is the location of development rather than the amount of development that will determine the impact of on the historic environment. It is considered that the ADR sites can be developed without a notable impact on the historic environment. Beyond this it is considered that a further 5,000 homes would need to be identified through a Green Belt Review. This level of development could impact on the quality of the historic built in environment in a number of settlements.

9,600 Target		
SA Objectives	SA Effects	Commentary
EV5 To manage waste in accordance with the waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal	0	There are no clear links between the amount of housing growth and waste management
EV6 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	0	The level of growth has no direct effect on this objective. The location of development will be relevant but can be addressed by water management techniques such as SuDs, recycling and other innovative methods.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The level of growth has no direct effect on this objective.
EV8 Protect and enhance the quality of water, soil and air	0	Building 9,600 homes may not impact on the quality of water, soil and air.
EV9 Reduce causes of and adapt to the impacts of climate change	0	The level of growth has no direct effect on this objective.
<b>Economic Objectives</b>		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	++	Such a high level of housing could provide a significant boost to the local economy and attract inward investment.
EC2 promote and support the development of new technologies of high value and low impact	++	A figure of 9,600 is likely to stimulate a high level of employment growth and could potentially lead to growth in the new technology sector.

9,600 Target		
SA Objectives	SA Effects	Commentary
especially resource efficient technologies and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The level of housing growth is unlikely to affect educational opportunities.

10,500 Target		
SA Objectives	SA Effects	Commentary
Social Objectives		
SO1 Provide decent affordable housing for all, of the right quality and tenure and for local needs in clean safe and pleasant local environment	++	A target of 10,500 would deliver a significant amount of affordable housing.
SO2 To improve the health and well-being of the population and reduce inequalities in health	0	The level of growth has no direct effect on this objective. Policies in the plan will ensure that infrastructure is delivered and development is well located to ensure the health and well-being of the population is not harmed
SO3 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	++	A target of 10,500 would lead to notable growth in both Bromsgrove Town and the large settlements. It is therefore considered that the vitality and viability of the Town Centre and other local centres could be enhanced.
SO4 Reduce crime, fear of crime and anti-social behaviour	0	The level of growth has no direct effect on this objective.
SO5 Increase sustainable travel choices and move towards more sustainable travel patterns	+	Policies in the plan will ensure that development is in located in sustainable locations with sufficient transport infrastructure. Regardless of scale, there should be a positive impact against this objective.
SO6 To provide opportunities for	0	The level of growth has no direct effect on this objective

10,500 Target		
SA Objectives	SA Effects	Commentary
communities to participate and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community		
Environmental Objectives		
EV1 To conserve and enhance biodiversity and geodiversity	--	A target of 10,500 would require extremely high levels of greenfield development and therefore it is likely that there could be a significant impact on biodiversity and geodiversity.
EV2 Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest.	--	A target of 10,500 would result in the loss of a large amount of greenfield and Green Belt land for development. The development is likely to result in the loss of some high quality agricultural land.
EV3 Safeguard and strengthen landscape and townscape character and quality	--	The loss of a significant amount of greenfield land could harm landscape character and quality.
EV4 Conserve, protect and enhance the architectural, cultural and historic environment heritage and seek well designed, high quality built environment in new development proposals.	-	It is the location of development rather than the amount of development that will determine the impact of on the historic environment. It is considered that the ADR sites can be developed without a notable impact on the historic environment. Beyond this it is considered that a further 6,000 homes would need to be identified through a Green Belt Review. This level of development could impact on the quality of the historic built in environment in a number of settlements.
EV5 To manage waste in accordance with the	0	There are no clear links between the amount of housing growth and waste management

10,500 Target		
SA Objectives	SA Effects	Commentary
waste hierarchy: 1) prevention, 2) preparing for reuse, 3) recycling, 4) other recovery, 5) disposal		
EV6 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	0	The level of growth has no direct effect on this objective. The location of development will be relevant but can be addressed by water management techniques such as SuDs, recycling and other innovative methods.
EV7 Promote resource efficiency and energy generated from renewable energy and low carbon sources	0	The level of growth has no direct effect on this objective.
EV8 Protect and enhance the quality of water, soil and air	-	There is concern that growth of this scale may lead to a reduction in air quality due to the high level of construction and increased car usage from the significant population growth.
EV9 Reduce causes of and adapt to the impacts of climate change	0	The level of growth has no direct effect on this objective.
Economic Objectives		
EC1 Develop a knowledge driven economy, the infrastructure and skills base whilst ensuring all share the benefits, urban and rural	++	Such a high level of housing could provide a significant boost to the local economy and attract inward investment.
EC2 promote and support the development of new technologies of high value and low impact especially resource efficient technologies	++	A figure of 10,500 is likely to stimulate a high level of employment growth and could potentially lead to growth in the new technology sector.

10,500 Target		
SA Objectives	SA Effects	Commentary
and environmental technology initiatives		
EC3 To raise the skills levels and qualifications of workforce and quality of educational opportunities for all	0	The level of housing growth is unlikely to affect educational opportunities.

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

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