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Bromsgrove District Council
Draft Core Strategy 2 Consultation Statement

January 2011

Bromsgrove
District Council
www.bromsgrove.gov.uk

LDF Local Development Framework

Draft Core Strategy II: Consultation Statement
January 2011

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Appendices

1) Introduction

1.1   This report describes the consultation process carried out and results obtained by the Council in relation to both the Draft Core Strategy and Redditch Growth consultations. In order to gain the full picture of the consultation carried out to date on the whole Core Strategy process (including issues and options) it should be read in conjunction with the previous Consultation Report issued alongside Draft Core Strategy 1 published in October 2008. The consultation is required by Regulation 25 of the Town and Country Planning (Local Development) (England) Amendment Regulations which came out in June 2008. The new regulations refer to the need for public participation in the preparation of the Development Plan. The regulations no longer require a specific consultation on "preferred options" and the purpose of regulation 25 is to give Local Planning Authorities wider scope in engaging stakeholders and interested parties in the preparation of their DPD's.

1.2   The report will also set out how feedback from these consultations has helped to inform the Draft Core Strategy II. This document shows how the new version of the Draft Core Strategy has evolved from taking account of consultation feedback, evidence and national planning policy.

1.3   The consultation has been undertaken in accordance with the programme and timetable set out in the Local Development Scheme for the preparation of the Local Development Framework.

1.4   Furthermore the consultation has followed the methodology and techniques set out in the Statement of Community Involvement which is available to view on our website www.bromsgrove.gov.uk .

2) Executive Summary

2.1   Consultation on Draft Core Strategy (October 2008)

2.2   The Council consulted on the Draft Core Strategy between 31st October 2008 and 16th February 2009. To maximise exposure a number of consultation methods were used. These included:
- Adverts in local newspapers;
- Advertisement on the Council website;
- Letters to hundreds of interested people and organisations within the Council's database;
- Copies of the document were made available for inspection at local libraries and the Customer Service Centre;
- 'Drop-in' event at the Council House;
- Presentations to Parish Councils; and
- Attendance at LSP meetings

2.3   Redditch Growth Consultation

2.4   The Council undertook a period of joint consultation with Redditch Borough Council between early February and March 22nd 2010. A range of consultation methods were used to ensure that local residents were aware of the growth issue. Consultation methods included:
- Adverts in local newspapers;
- Advertisements on both Councils websites;
- Letters to hundreds of interested people and organisations within the Council's database;
- Copies of the document was made available for inspection at local libraries in both Redditch and Bromsgrove, Redditch Town Hall, Bromsgrove Council House and the Customer Service Centre;
- Events throughout the consultation period at various locations in Bromsgrove and Redditch; and
- Presentations to community groups

2.5   The events and 'drop-in' days held for these consultations proved to be very popular and enabled local communities to directly engage with planning officers. The variety of consultation methods used ensured that people from different backgrounds and various communities were able to get involved.

2.6   Responses to Draft Core Strategy

2.7   In total 127 responses were received to the Draft Core Strategy. Responses were received on all elements of the document including the spatial vision and each of the 17 policies. Some comments were general and related to the document as a whole, whilst others noted issues that had not been addressed within the document.

2.8   The responses helped to shape the Draft Core Strategy II. Changes varied from minor wording changes to the creation of new policies. For example, as a result of feedback new policies were included on Homes for the Elderly, Planning Obligations and the Green Belt. A settlement hierarchy was also included to provide clarity on the types of development that may be appropriate in different settlements.

2.9   Changes were also made to the structure of the document. For example, the policies have been broken down into five distinct sections making the document easier to navigate. The structure no longer doggedly follows the themes of the Sustainable Community Strategy which makes the document flow more logically. A glossary has also been added as an appendix to make abbreviations and the jargon used in the document easier to understand.

2.10   Responses to Redditch Growth Consultation

2.11   In total 123 responses were received to this consultation. Many responses focussed on the three possible areas of growth located north of Redditch at land east of the A441, land west of the A441 and land adjacent to the A448. Strong objections were received against development in all three Green Belt locations in Bromsgrove, the Webheath ADR and the 2 areas of Green Belt within Redditch together with some support. A large number of reasons for objection were highlighted by respondents and these included insufficient infrastructure, traffic congestion, loss of biodiversity and impact on the Green Belt.

2.12   Further details on the consultation responses received (from both consultations) and how they influenced the evolution of the Draft Core Strategy II are contained in the following chapters.

3) Consultation Methods: How Did We Consult?

3.1   Draft Core Strategy

3.2   On 31st October 2008 the Draft Core Strategy was published with the consultation period running until 16th February 2009 aiming to ensure that all interested parties had an opportunity to get involved.

3.3   Letters were sent to hundreds of people and organisations inviting comments on the document. An advert was also placed on the Council website, within a number of local newspapers and the Council magazine 'Together Bromsgrove' to ensure that exposure was maximised. The advert from 'Together Bromsgrove' is enclosed at Appendix A. Copies of the Core Strategy were also placed in public libraries, the Council House and the Customer Service Centre. A summary document entitled 'Have Your Say' was also published to explain the purpose and contents of the Core Strategy to enable the whole community to understand the importance of the document.

3.4   All local residents and interested parties were invited to a 'drop-in' event which was held at the Council House. This gave people the opportunity to discuss any issues or concerns they had directly with planning officers.   Poster boards were set up highlighting the key issues such as housing, the economy and the environment and stating how they were going to be addressed. Presentations also took place throughout the day to provide a simple overview of the Core Strategy. The event was well attended with over fifty people visiting throughout the day. A photo from the 'drop-in' day is attached at Appendix B.

3.5   The Draft Core Strategy was published at the same time as the Redditch Core Strategy due to cross boundary issues.   Therefore Council Officers attended the 'drop-in' day for the Redditch Core Strategy at Redditch Town Hall and also had display material available there on the Bromsgrove Core Strategy. Redditch officers were also invited to do the same Bromsgrove's drop in day event.

3.6   The Council also contacted all the Parish Councils in the District and offered to present the Core Strategy at a Parish Meeting. Alvechurch and Hagley Parish Councils both accepted this offer and officers duly attended Parish Council Meetings to present the Core Strategy and answer any questions.

3.7   The Draft Core Strategy was also presented at a Local Strategic Partnership (LSP) meeting to ensure that all local stakeholders were aware of and understood the purpose of the Core Strategy.

3.8   Redditch Growth Consultation

3.9   In early February 2010 Bromsgrove and Redditch Council published a consultation leaflet on the Redditch growth issue. The Consultation period ended at the end of April 2010 allowing ample opportunity for involvement.

3.10   The Consultation was advertised widely through various means. Adverts were placed in local newspapers in both Bromsgrove and Redditch, the consultation was published on both Council websites and also details were attached on all outgoing emails sent by planning officers (including development control) at both authorities. The Consultation documents were also made available in various public buildings across the two local authority areas including libraries, Redditch Town Hall and Bromsgrove Customer Service Centre. Letters were sent to hundreds of people and organisations inviting people to comment on the document.

3.11   A number of consultation events were held throughout the consultation period. They took place as follows:

- 11th February   Town Hall Redditch   (2-9pm)

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

3.12   These events were well publicised in local newspapers and flyers were hand delivered to residents in the settlements of Bordesley and Rowney Green and also those in the Parishes of Bentley/ Pauncefoot and Tutnall / Cobley. A copy of the flyer that was hand delivered to residents of Bordesley. These events were very well attended and gave hundreds of local residents the opportunity to highlight issues and raise concerns.

3.13   To maximise exposure and increase understanding of this complex issue the Councils made joint presentations to local groups. These included Redditch Community Forum, Bromsgrove Community Forum and Alvechurch Parish Council. The consultation was also presented in a number of neighbourhood centres around Redditch.

4) Consultees: Whom Did We Consult?

4.1   Draft Core Strategy

4.2   Bromsgrove District Council is keen to ensure that the Local Development Framework reflects a broad cross section of community interest including traditional hard to reach groups. To ensure a wide variety of people and groups were consulted a large number of letters were sent out and adverts were placed in local newspapers.

4.3   The 'drop-in' day was well attended by the general public with people attending from different backgrounds and communities across the District. The event ran from 10am to 7pm to give an opportunity for everyone to attend including those who were working during the day.

4.4   The Council made direct contact with every Parish Council in the District offering to attend a Parish meeting to present the document. Where Parishes accepted this offer it enabled local communities to ask questions and gain knowledge and understanding of issues within the Core Strategy.

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

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

4.7   Redditch Growth Consultation

4.8   Every effort was made to ensure all sections of communities were fully involved, with a number of consultation events held at different times of the day and week including evenings and weekends. The events were also held in different locations to maximise accessibility with locations including the Kingfisher Centre, Alvechurch Baptist Church and Bentley Village Hall.

4.9   Discussions were held with many relevant infrastructure providers to discuss the implications of this growth. These included utilities firms, the education authority and emergency services.

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

5) Responses: What Did They Say?

5.1   A summary of responses received to both the Draft Core Strategy (October 2008) and the Redditch Growth Consultation (Jan 2010) are presented as follows:

5.2   Draft Core Strategy (November 2008)

5.3   The main comments received in relation to the spatial vision and each of the 17 policies have been summarised. Views expressed against the document as a whole have also been highlighted.

5.4   The Spatial Vision

5.5   In summary the vision set out that by 2026 Bromsgrove will have become a more sustainable, healthy, prosperous and accessible District whilst preserving and enhancing physical and natural assets. The vision highlighted that Bromsgrove Town and Longbridge would be the main focus of development and the employment base would widen, out commuting would reduce and the younger population would be retained.

5.6   Several respondents felt that there was too much of an urban focus within the vision with Bromsgrove Town and Longbridge discussed in detail. People felt that there could have been a greater mention of other settlements in the District and also rural issues such as farming and farm diversification.

5.7   Concerns were raised that the vision did not mention support for the Districts existing employment base. It was considered more important

to support the expansion of existing businesses before introducing new employment developments.

5.8   Some felt that there could be stronger links between the spatial vision and the core policies. The view was also raised that the vision could go into a greater level of detail as to how it would be achieved. For example, housing needs would be met through an urban extension to the north west of the town.

5.9   There were other issues that respondents felt were not covered or should be covered in greater detail. These included meeting the growing elderly population, biodiversity, affordable housing and the achievement of housing targets.

5.10   CP1 Climate Change

5.11   This policy advocated an adherence to the energy hierarchy; set levels of renewable energy to be provided in new development; sought improvements to public transport and reduced the need to travel by car; required new development to provide facilities for waste minimisation and recycling and promoted new industries and technologies which address climate change.

5.12   In general this policy is supported, especially the overall concept of climate change.   A number of comments emphasised the positive aspects associated with the provision of renewable energy across the District. However, in spite of this support, there were a number of points respondents believed should be addressed.

5.13   Several comments related to the provision of SuDs to prevent increases in flood risk and to deal with the implications of climate change. There was also an agreed consensus that climate change adaption should be addressed and not just mitigation. Many comments related to the lack of evidence to support the policy, particularly in terms of viability.

5.14   There were also a number of comments that the policy either repeated national guidance or was excessive. A number of developers believed criterion 'f' regarding renewable energy production was unreasonable and would hinder future growth and development. Criterion 'e' regarding zero or low carbon energy generation was also heavily criticised on viability grounds.

5.15   Some respondents believed other factors could be included as part of the policy, in particular, there should be more prominence given to sustainable transport and the use of public transport combined with walking and/or cycling. Some comments also related to a greater use of the natural environment and urban green spaces for mitigation against and adaptation to the impacts of climate change. The policy

was also criticised for being too generic and not specific to the District of Bromsgrove.

5.16   CP2 Distribution of Housing

5.17   This policy established a hierarchy when determining the location of new housing growth (even though the level at that time was uncertain) and was based on sound principles such as sustainability, reuse of brownfield land and reducing unnecessary encroachment into the Green Belt.

5.18   Responses to this policy were quite varied.   There was support for brownfield land at the top of the hierarchy although some felt the policy should distinguish between different types of brownfield land highlighting those which are unsuitable for housing development. It was also mentioned that additional text should be added to state that the development of brownfield land should only be supported in sustainable locations.

5.19   Concerns were raised over the hierarchy with some feeling it could have been made clearer.   It was contended that the hierarchy should be amended to include greenfield land within settlement boundaries and also that rural exception housing and Green Belt infill should not form part of hierarchy.

5.20   It was noted that allowing infill development of market housing in rural settlements undermined the ability to deliver affordable housing for identified local needs.

5.21   Some respondents felt that there should be some mention of general housing development in the Green Belt. These responses varied from simply stating that there should be provision for a Green Belt Review whereas some felt that pockets of Green Belt land should be released for housing.

5.22   Respondents felt that a settlement hierarchy was required to identify the amounts and types of development that would be permitted in particular settlements.   Other respondents felt that some strategic sites should be identified and that there should be clearer phasing within the policy.

5.23   CP3 Rural Renaissance

5.24   This policy provided a framework for existing villages to retain their character whilst continuing to evolve in a sensitive manner, predominantly to meet local needs. It also recognised the importance of the rural economy and supported its diversification if required to maintain viability.

5.25   Some felt that there needed to be some clarification over which parts of the District the policy applied to. This was considered to be an issue because potentially the policy as a whole could apply to more places within the District than the list of settlements that are highlighted as suitable for rural exception housing.

5.26   There were concerns that the policy does not put enough emphasis on farming and agriculture. With such a large proportion of the District used for agricultural purposes greater efforts could be made to retain and enhance agricultural production.

5.27   There was a feeling that the policy could do more to promote rural employment in terms of not only the expansion of rural employment sites but also encouraging new businesses and home working.

5.28   There was general support for affordable housing in rural areas where a local need had been identified. Although some felt that rural exception housing should only be permitted within existing village envelopes. Others felt the policy was too restrictive and it was not appropriate to list the settlements where rural exception housing could apply.

5.29   Some respondents felt that all rural communities should be able to meet their own needs, irrespective of their size and therefore the policy should give greater support to enable this to be achieved. Although in contrast some felt that local needs should only be meet where it accorded with sustainability criteria and there was access to public transport.

5.30   CP4 Promoting High Quality Design

5.31   This policy required new development to be built to the highest design standards for example in terms of urban design, designing against crime, energy efficiency, respecting local distinctiveness and its contribution towards sustainable development.

5.32   This policy received overwhelming support and many respondents agreed with the principles of good quality and eco-friendly design. The inclusion of references to crime and disorder were also noted as being beneficial, especially by West Mercia Constabulary, although it was suggested that the policy should seek to encourage compliance with 'Secured by Design', Lifetime Home Standards and include references to CABE's Building for Life standards.

5.33   Non supportive comments included the need to recognise that biodiversity can also be an element of urban landscapes and there should be measures which allow for species migration such as planting of street trees. Comments also referred to recognising the need for and value of high quality open space which plays an important part in local character and sense of place. This was reinforced by references made

to respecting character, identity, culture, context of settlement pattern, historic townscape and landscape.

5.34 The term 'climate-proofed' was also questioned a number of times, with respondents suggesting the term being defined or replaced with 'climate resilient'. There was also the suggestion of segregating the policy into two sections so one could deal specifically with 'green' issues.

5.35 CP5 Managing Natural Assets

5.36 This policy identified criteria against which new development proposals may be assessed to ensure that aspects which make Bromsgrove distinctive, such as its attractive countryside, are protected and enhanced. It also recognised the importance of geodiversity and biodiversity.

5.37 The overall principles of this policy are supported by respondents, especially in regards to the positive management of the District's biodiversity assets. However, a number of respondents comments regarded the policy as too generic and should not only be more localised, but also strengthened. There should be more in depth consideration given to geodiversity with greater clarification on the reference to the Geodiversity Action Plan.

5.38 Other comments relating to the strengthening of the policy included, expanding the policy to protect and enhance natural assets such as air, soil and water; as well as irreplaceable semi-natural habitats that do not benefit from statutory protection. The Environment Agency thought the policy could be reinforced by making reference to the Water Framework Directive and River Severn draft River Basin Management Plan. The policy should also expand on the enhancement of natural assets as well as simply protecting them. The use of the word 'support' can be misleading and could be made more substantial throughout the policy, as there is no reason why development cannot integrate with landform or respect the landscape through sensitive design and layout. Links could also be made to the Core Strategy objectives.

5.39 A number of private sector respondents believe it is unrealistic for developments to demonstrate their support for geodiversity and biodiversity and where appropriate to manage them. There was also a consensus from the private sector that biodiversity and archaeological issues are covered by legislation and therefore need not be included. They also noted that unless locally characteristic species are statutorily protected, then the Core Strategy is unable to protect or enhance them.

5.40 Although there was an agreement in the principles of the policy, many respondents sought clarification of the policy's delivery mechanisms. There should be careful consideration as to how applications will be

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judged and what information will need to come forward to enable judgement to be made.

5.41 CP6 Managing Man-Made Assets

5.42 This policy acknowledged Bromsgrove's rich historic legacy and the importance of preserving and enhancing Bromsgrove's uniqueness for the enjoyment of future generations.

5.43 As is the case with CP5, the overall principles of this policy are supported by respondents, but need to be strengthened. It is important to stress the importance of local sites and monuments and their protection. Heritage protection reforms stress the importance of these as well as assets of regional and national significance. This should therefore be properly reflected in local plans rather than simply relying on regional policy and statements. The ongoing Historic Landscape Character Assessment provides a deeper understanding of the evolution of the surviving historic character of the District's landscape – but no mention of this important piece of evidence is made, in text or policy. There is also support given to the production of a local list.

5.44 Some respondents felt that the text was somewhat generic and could be made more locally distinctive, for example, referring to issues and options in different parts of the District. The policy fails to capitalise on the enhancement instead of simply the protection of assets and there is also the need to set out a strategy for the management of the historic environment.

5.45 Comments received from the private sector viewed the policy as over-restrictive and believed the policy should go further in enabling development. Many were opposed to the blanket presumption of the retention of Listed Buildings and inflexible wording regarding alternative and viable development in Conservation Areas.

5.46 CP7 Water Management and Flood protection

5.47 This policy placed a due emphasis on the impact of water especially in relation to climate change and set parameters for future development to ensure that development addresses this issue.

5.48 This policy received a large number of responses, mainly comments relating to how the policy can be improved. The Environment Agency (EA) stated that new development shouldn't jeopardise the biodiversity and flood risk function of a watercourse or restrict maintenance access to the watercourse. New development adjacent to watercourses should provide an adequate easement alongside the watercourse and culverts should be re-opened where possible and restored. There must be a presumption for methods that work with the natural environment wherever possible and therefore soft engineering

solutions to drainage should be preferred to hard engineering solutions unless there are overriding reasons preventing their use.

5.49   The EA also commented that all development should be in Flood Zone 1 as development and service provision must ensure that communities and the environment are not adversely affected by flooding. Development in Flood Zones 2 and 3 should contribute positively to reducing flood risk. It is also essential that all appropriate measures are taken to ensure that the underlying aquifers are protected by planning policies/objectives.

5.50   There were several comments mentioning that maintenance needs to be improved across the District in terms of drains and ditches. Ensuring there is adequate sewerage capacity and upgrading systems where required will reduce the risk of foul flooding and the associated costs and loss of amenity. The improvement of water management is vital to ensure river navigations and canals remain open which can be achieved by better storm flow management and ensuring new developments include SuDS. Although this comment was contradicted as one response thought the policy should state that SuDS are not appropriate in all circumstances. The policy should also have regard to relevant Catchment Management Strategies that show water resource availability.

5.51   Some respondents considered the policy merely repeated National guidance with no specific relevance to Bromsgrove, whereas another comment considered the policy to be written contrary to PPS25.

5.52   Other areas that respondents commented on that would benefit the policy, included; expanding the policy to cover surface water flooding and how flash flooding of ordinary watercourses will be alleviated; information on water resources ensuring water supply and waste water disposal and ensure impacts are fully understood/managed and key facilities are in place in tandem with development phases. The policy could also be strengthened by supporting text that references retro fitting of existing properties at risk of flooding, as well as documents such as 'Sewer for adoption', CIRA document C635 'Designing for exceedance in urban drainage – good practice' as it shows how new development should be designed to minimise the impact of flooding.

5.53   CP8 Distribution of Employment Development

5.54   This policy sought to ensure that economic growth was focused primarily on Bromsgrove Town whilst providing some flexibility for development in other areas to meet needs such as Longbridge. It acknowledged the importance of encouraging growth in new sectors and skills development.

5.55   Many respondents felt that the policy could have a clearer distinction between new employment and existing employment. Some also felt that there should be a greater emphasis on existing employers in the District with policy supporting expansion plans.

5.56   Conflicting views were received in relation to the retention of land for employment purposes. Some felt that the period of marketing should be extended to 24 months whereas others thought the policy was overly restrictive and could harm housing supply. A response was also received stating that they felt this part of the policy was unclear. They were not certain whether an applicant would need to meet one or all four of the criteria before a change of use of employment land would be considered favourably.

5.57   Some felt that there should be greater emphasis on rural employment. Suggestions included homeworking and small scale office developments to help reduce the numbers of people who commute daily.

5.58   There were also some respondents that felt the policy should contain some reference to mixed use urban extensions.

5.59   CP9 Retail and Town Centre Regeneration

5.60   This policy reinforced the role of Bromsgrove Town Centre in providing adequate facilities to cater for the needs of the District. It also sought to strengthen the role of local shopping centres by prohibiting retail development outside such centres.

5.61   There was general recognition that the regeneration of the Town Centre was a priority for the District. However, some felt that the policy should set out a more defined retail hierarchy that highlighted the role of other retail centres in the District.

5.62   Some felt that the policy could have gone into greater detail in relation to the types of uses to be promoted in the Town Centre. Suggestions included promoting a more varied evening economy, a vibrant café scene and youth cafés.

5.63   Transportation issues were highlighted by a number of people. Some respondents stated how important it was to improve links with the train station as a way of attracting more people into the Town Centre. Respondents also identified that diverting through traffic around the Town would create a pleasant and sustainable Town Centre environment.

5.64   CP10 Sustainable Transport

5.65   This policy aimed to improve accessibility whilst encouraging more sustainable means of travel, such as cycling, walking and public transport and reducing the need to travel. It set out criteria against which new development could be judged. It also provided the basis for the development of the new railway station emphasising effective bus connections with Bromsgrove Town Centre.

5.66   The majority of respondents agreed that sustainable transport and travel methods were needed across the District, especially as there is such a huge reliance on the motor car. There was an established consensus that public transport needs to be improved; with services becoming more regular and supportive of the need to travel for specific purposes, i.e. shopping, dentist, etc.

5.67   There was an agreement that Bromsgrove Railway Station needs to be improved, but also that the District's other stations need upgrading. Waterborne transport is under utilised across the District and the policy should mention this mode of transport in terms of both passengers and freight in order to reduce traffic congestion.

5.68   Both the Highways Agency and Worcestershire County Council state that this policy needs a robust evidence base. There needs to be reference to the Integrated Passenger Transport Strategy, the Rights of Way Improvement Plan, and the Bromsgrove Accessibility Assessment. The collaborative working with the County Council, particularly with improvements to bus facilities and services should be mentioned to add weight to the policy.

5.69   CP11 Open Space and Recreation

5.70   This policy acknowledged likely future deficiencies and encourages increases in provision and the quality of such provision. It also supported the protection and/or provision of green corridors, setting out criteria against which new development may be judged.

5.71   A large number of respondents believe there is insufficient open space and recreation across the District, and are in agreement that this provision needs to be greatly improved. The policy should also protect allotments from development and help provide them on new housing sites. There was support to link open spaces with green corridors, but more emphasis should be placed on the specific Green Infrastructure element in the Core Strategy. Green Infrastructure should be explored in more detail, acknowledging intrinsic biodiversity value but also noting that not all spaces are suitable for a transport or amenity role.

5.72   Safeguarding existing open spaces is strongly supported, but the policy could be expanded to include water corridors such as rivers, canals and towpaths; as well as more emphasis on woodland areas. The policy does not specify where open space and recreational facilities are required and could benefit from actual targets. However, the private

sector are concerned that provision is not always possible on smaller sites and provision should only be generated on developments that actually need open space.

5.73   CP12 Size, Type and Tenure of Housing

5.74   This policy sought to deliver housing that met the needs of the local population by ensuring a mix of tenures, size and type of homes, including affordable housing, are provided across the District. In line with Government guidance the policy also emphasised an increase in densities in appropriate locations.

5.75   Many respondents felt that the policy should place greater emphasis on addressing the housing needs of the increasing elderly population. This includes building all homes to lifetime home standards, the need for extra care developments and extensions to care homes.

5.76   Some felt the focus on building two and three bedroom properties was overly prescriptive and could date quickly. Others felt that it was not appropriate to assume that small households wanted smaller homes and therefore larger homes should be built if that is what stimulates the housing market. It was considered important to address demand as well as need.

5.77   Several people expressed views that it was not appropriate to highlight that lower density development would only be acceptable in Barnt Green. Some felt that other areas that were suitable for low density development should be identified in the policy.

5.78   Some respondents felt that the policy should differentiate between large and small sites as generally a larger mix of houses would be expected on a strategic site to help create balanced and mixed communities.

5.79   CP13 Accommodation for Gypsies, Travellers and Showpeople

5.80   This policy acknowledged the importance of providing adequate housing to cater for the needs of the District as stressed in PPS3 Housing which states Local Planning Authorities should plan for a mix of housing on the basis of the different types of household that are likely to require housing over the plan period, including gypsies and travellers.

5.81   The policy was generally welcomed although some felt that the Council could be more pro-active in engaging with the local travelling community.

5.82   Minor wording changes were also suggested for the policy. These included re-phasing criteria e) which referred to the site not being detrimental to the amenities of adjacent occupiers. There was a

concern that this sentence could be misinterpreted. There was also a request that the policy should make reference to any potential site having suitable drainage measures in place.

5.83 CP14 The Scale of New Housing

5.84 This policy sought to manage the release of housing land in response to the potential housing allocation emanating from the RSS Phase 2 Revision. It reinforced the hierarchy outlined in CP2 Distribution of Housing and set out criteria to control the development of windfall sites.

5.85 The main criticism of the policy was that it did not actually state what the quantum of development would be.

5.86 Several responses were received in relation to the criteria set out for residential development. There were concerns raised that criteria e) which referred to a mix of housing types and tenures was repetition of other policies in the Core Strategy and therefore should be deleted. Respondents felt that there needed to be some reference to enabling development, geo-diversity, historic assets and water infrastructure within the policy. One respondent also highlighted that it was not always necessary for infrastructure to be in place as it can be provided as part of the development.

5.87 The comments received in relation to windfall development were mixed. Some felt the wording was overly negative and that there should be a reference to maintaining a five year supply of sites. Whereas some felt that the policy should identify unacceptable types of windfall development.

5.88 Some felt that the policy should identify strategic sites where a full range of house types could be provided.

5.89 On a more general note it was suggested that all of the housing related policies should be located together in the Core Strategy. This was considered to be more logical and would make the document easier to read.

5.90 CP15 Cross Boundary Growth

5.91 This policy recognised the importance of the chain of conformity and that policies contained in the Core Strategy must be flexible enough to cater for proposals set out within the emerging RSS. It also clarified the District Council's objections in relation to this growth. In addition, it highlighted a new issue for consultation purposes. It set out the implications for Bromsgrove in terms of the potential for a further increase in growth of Redditch and/or Birmingham arising from the Governments wish to increase housing targets across the region.

5.92 Significant concerns were raised over the possibility of cross boundary growth. Some felt that Redditch Council should find land within their own Borough to cater for this growth. A number of reasons were identified as to why growth should not take place north of Redditch. These reasons included the impact on road and water infrastructure, environmental assets, recreation facilities and the Green Belt. It was highlighted that large swathes of Green Belt land would be lost and this would result in urban sprawl and the coalescence of settlements.

5.93 If development was to occur in this location some respondents highlighted that the Council would need evidence on the historic environment and make use of the Landscape Character Assessment, Habitat Inventory, Phase 1 habitat maps whilst also undertaking a full Green Belt review. Concerns were expressed over the methodology used in the White Young and Green Studies into growth options around Redditch.

5.94 Some respondents felt that growth should be located in the most suitable and sustainable locations regardless of administrative boundaries. It was also highlighted that a co-ordinated approach between the three local authorities would be required to deliver growth.

5.95 CP16 Affordable Housing

5.96 This policy set thresholds for affordable housing against which new development proposals would be assessed and was based on the Bromsgrove Housing Market Assessment. It sought to increase the annual provision of affordable housing in order to alleviate the identified shortfall in provision.

5.97 Respondents agreed that affordable housing was a major issue in the District that needed to be addressed. However, some queried whether the Council had robust evidence to justify the thresholds and targets set out within the policy. There were also concerns raised whether the 40% target was too restrictive in the economic downturn with some feeling that the policy could have been written in a more flexible manner.

5.98 In contrast one respondent felt that any sort of threshold could be problematic as there is the concern that some developers may try to submit applications below the threshold to circumvent the policy. It was also noted that the threshold of five dwellings in village envelopes is meaningless as infill on this scale would not be permitted in the Green Belt.

5.99 Some felt that the policy should be redrafted to conform with PPS3 and this would include greater detail on the types of affordable units required.

5.100 CP17 Sustainable Communities

5.101 This policy sought to ensure adequate infrastructure is in place to support new development and that development would not lead to a loss of essential local facilities.

5.102 There was considerable support for this policy and the need to create sustainable communities. Many respondents wanted the policy to be linked to other topics and expanded to include public transport, affordable housing, Green Infrastructure and rural areas.

5.103 Many respondents thought the concept of CIL would be useful but was an unrelated topic to sustainable communities and would be best suited to a separate policy or a Planning Obligations SPD.

5.104 General Comments

5.105 A number of comments were received that related to the document as a whole or policies that people thought should be included. Some respondents praised the clarity and concise nature of the document whilst others disagreed and felt that too much jargon was used making the document confusing to read.

5.106 Some felt that the document was written in a flexible manner in particular in relation to housing growth. Respondents felt that the Core Strategy failed to plan for housing above the preferred option figure of 2100. Many felt that its figure was too low and 4000 would be a more appropriate target.

5.107 Many felt that that the document lacked a clear strategy. There were concerns that the policies did not build on the vision and that generally they needed to be linked more closely. Some respondents could not see how the vision was going to be achieved.

5.108 Concerns were raised that the document was too repetitive. Not only were similar messages being put across in different policies but some also felt the document repeated national policy. Some respondents considered that many of the policies were not written strategically and in some cases were more like criteria based development control policies.

5.109 Respondents identified a number of issues that they felt needed to be covered in greater detail within the document. These included a strategy for ADR release, a clear phasing policy, a settlement hierarchy, a Green Belt policy and a policy that addressed the housing needs of the elderly.

5.110 Redditch Growth Consultation

5.111 The primary purposes of this joint consultation was to seek views on the growth in three broad areas around the north and west of Redditch within Bromsgrove District; to convey the message that Redditch had very little capacity within the Borough for new growth but to identify the sites on which some of the growth could be accommodated, including 2 areas of green belt land within Redditch and the 3 ADR's. The three areas of growth identified adjacent to the boundary of Redditch but within Bromsgrove District were:

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

5.112 The responses to each of these three areas are summarised below;

5.113 East of the A441

5.114 A large number of concerns were raised by respondents. The loss of Green Belt was considered to be a major issue in terms of the reduction of the gap between Redditch and Birmingham and also coalescence with settlements such as Bordelsey. Respondents highlighted that damage could be caused to the natural environment. This included the loss of habitats such as trees and hedgerows which would harm wildlife populations and significantly reduce biodiversity value. The loss of amenity space was an issue for local residents and many also felt that the topography of the land meant that it was unsuitable for development. Many respondents felt that there was inadequate infrastructure in the area and therefore traffic would be a major issue and levels of flooding will increase. Some respondents also felt that development north of Redditch would encourage in-migration from Birmingham. A limited amount of support was also expressed.

5.115 West of the A441

5.116 A number of similar concerns were also raised in relation to the area west of the A441 together with a limited amount of support. The loss of large amounts of Green Belt land were considered to be a major issue with many concerned about the reduction in the gap between Birmingham and Redditch. Many respondents felt that the natural environment needed to be protected in this location due to the presence of mineral deposits, the adverse impact on Brockhill Woods and the potential for the designation of a SSSI. It was highlighted that development here could have a negative impact on biodiversity due to the loss of natural habitats. Concerns were also raised about the inability of existing infrastructure to cope with such large scale development. Infrastructure concerns include road congestion and the upgrade required for water supply and waste water. Local residents also highlighted the lack of local amenities in the area and that

additional development will increase levels of localised flooding. Some respondents also felt that development north of Redditch would encourage in-migration from Birmingham.

5.117 Adjacent to the A448

5.118 A large number of issues were also raised in relation the land adjacent to the A448. The loss of large areas of Green Belt land was a concern particularly as some felt there was no defensible Green Belt boundary, which could potentially lead to the coalescence of settlements. Respondents highlighted the level of harm that would be caused to biodiversity and the natural environment. The area contains Foxlydiate Wood Local Nature Reserve, Foxlydiate and Pitcheroak Woods Special Wildlife Site, Hewell Park Lake Site of Special Scientific Interest (SSSI) and is close to Hewell Historic Park. It was highlighted that this was the least sustainable option as it was furthest from Redditch Town Centre and employment opportunities. Concerns were raised over the poor public transport links and the distance to the train station meaning that there could be a reliance on car based travel. Other issues highlighted included difficulties in providing essential infrastructure such as sewerage, the loss of working farms and the possibility of ribbon development along the A448.

5.119 Summary

5.120 Generally there was strong public objection to development within the Bromsgrove Green Belt irrespective of location. Opposition with a limited amount of support was also expressed for the development of Webheath ADR within Redditch and the 2 areas of Green Belt located within Redditch. A number of key objections were highlighted in all locations and these included the lack of infrastructure, traffic congestion, the loss of Green Belt and the adverse impact on biodiversity.

6) Responses: How Did They Influence the Draft Core Strategy II?

6.1 This section explains the relationship between the consultation responses to the Draft Core Strategy (October 2008) and the Draft Core Strategy II. It does so by taking the individual elements of the Draft Core Strategy II and demonstrating a link between them and the original draft. The section also looks at the rejected responses and why the fit between them and the Draft Core Strategy II was not so good.

6.2 It is important to remember that while consultation responses are a key input to the emerging Core Strategy there are also many other inputs such as National Planning Policy, the West Midlands Regional Spatial Strategy, including its Phase 2 Revision and in particular the Examination in Public process which took place between April and June 2009 and subsequent Panel Report of the Inspectors,

stakeholders' input and so on. There is current uncertainty regarding the status of the RSS. The present Government intends to revoke/abolish the RSS and this intention is embodied in the Decentralisation and Localism Bill published in full on 14th December 2010. The Secretary of Sate as already attempted to revoke the RSS but the process used was held to be illegal in a High Court ruling. The RSS therefore forms part of the Development Plan at present. For Bromsgrove it is uncertain which version of the RSS is applicable. It is however accepted that the evidence underpinning the phase 2 revision is sound and has been independently examined by the Planning Inspectorate. Therefore in relation to Bromsgrove's needs the DCS2 has been prepared in this context.

Therefore, due to these wider influences, it may not always be able to amend the Strategy directly in response to consultation however much we wish to do so.

6.3   The Spatial Vision

6.4   The spatial vision sets out that by 2026 Bromsgrove will have become a sustainable, healthy, prosperous, safe and vibrant place to live. The vision highlights that all sections of the community will have been provided with access to homes, jobs and services. The vision also seeks to preserve and enhance the attractiveness of the District.

6.5   The new version of the vision provides a clearer link to the core policies, which addresses some of the concerns raised by respondents. For example the vision identifies that housing needs will be met through the delivery of an urban extension to the north and west of the Town.

6.6   Concerns were raised that the previous version of the vision was overly focussed on Bromsgrove Town. Significant changes have now been made to highlight the important role of the rural settlements in the District in terms of providing services and reducing the need to travel. Employment in rural areas is now clearly mentioned with references to farm diversification and sustainable rural enterprises.

6.7   Some respondents felt that there could have been a greater emphasis on biodiversity within the previous draft of the vision. The vision has been amended to highlight that green infrastructure will become an integral part of the fabric of the District and one of its multi-functional benefits will be biodiversity.

6.8   To ensure greater clarity over what the District will be like in 2026 the overall vision has been shortened. It has also been split up under the headings of sustainable communities, the town centre, the villages, the economy, community issues and the environment. This more straightforward layout is considered to more legible and paints a clear aspirational picture of the District for 2026.

6.9   CP1 Future Development

6.10   This policy sets out housing and employment targets for the period between 2006 and 2026. These targets are based on local evidence that was used by the Council at the Examination in Public of the Phase 2 Revision of the Regional Spatial Strategy.

6.11   Respondents to the previous Draft Core Strategy highlighted the need to specify the proposed levels of growth to provide certainty for all stakeholders and interested parties. The Council gathered significant amounts of evidence in relation to housing need in terms of both affordable units and also smaller two and three bedroom properties. This evidence was presented at the Examination in Public into the Phase 2 Revision of the West Midlands RSS. The Panel endorsed the Council's views and recommended within their report an allocation of 4,000 homes with the potential for a further 2,000 to 3,000 to be considered post 2021. It is noted that the Council has not previously consulted on this figure and therefore other suggestions are welcomed through the consultation process.

6.12   CP2 Settlement Hierarchy

6.13   The policy sets out a clear settlement hierarchy for the District that also broadly outlines the types of development that could be acceptable in each settlement type. The policy also highlights the four main facets to housing delivery in the District. The issue of development of residential gardens is addressed within the policy to ensure that certain criteria are met before schemes are considered favourably. The policy also highlights the need to achieve and then maintain a five year supply of housing land.

6.14   Several respondents to the previous draft felt that the Core Strategy needed to include a settlement hierarchy to provide clarity as to what development could be acceptable in certain settlement types. Following feedback to the earlier draft the development hierarchy has now been removed and replaced with a more clear policy highlighting the four main sources of housing development expected within the District. The need for site allocations was also identified by some respondents.

6.15   Some respondents had felt that there needed to be clarity on the kinds of windfall development that would not be acceptable. This helped to formulate the section of policy referring to development on residential gardens. This reflects the changes to PPS3 that re-classified garden land as no longer being previously developed.

6.16   The reference to the maintenance of a five year land supply has also been included following responses to the earlier draft document.

6.17 CP3 Development Principles

6.18 The policy highlights a number of criteria that all developments should have regard to. They include accessibility to public transport, infrastructure capacity, the impact on the natural environment and the compatibility with adjoining issues. The policy should ensure that all development is sustainable and does not have an undue impact on the surrounding area.

6.19 There was no comparable policy to this in the previous Draft Core Strategy however this new policy was shaped by some of the more general comments received in response to the previous draft. Some felt that there was too much repetition and duplication throughout the document. Therefore the best way to avoid this was to create a policy that highlighted the key elements to delivering a sustainable development in the District. The inclusion of this policy adds a level of clarity to the document as it highlights that all proposals will need to comply with this policy. This helps to address some the general concerns in relation to the lack of clarity in the previous document.

6.20 CP4 Bromsgrove Strategic Site Allocations

6.21 There are effectively two parts to this policy. The first part allocates three sites on the north and west of Bromsgrove Town and sets out the amount and types of development that will be expected to deliver a sustainable expansion of the town. The second part of the policy identifies other development sites around the District that will need to come forward to deliver the housing target of 4,000. The policy identifies sites in all of the most sustainable settlements in the District and sets out suitable uses and approximate capacities.

6.22 Some respondents felt that the Core Strategy should allocate strategic sites to provide a level of certainty and ensure the timely delivery of housing. The choice of strategic sites is backed up by suite of documents that tested possible options all around Bromsgrove Town to ensure that the most suitable and sustainable sites were selected. To provide a greater level of clarity to the document other development sites have also been identified. Some respondents considered that the previous draft lacked a clear overall strategy in terms of a housing target and how this would be achieved. It is considered that the addition of this policy has addressed this matter.

6.23 CP6 Housing Mix

6.24 This policy seeks to primarily deliver two and three bedroom properties which would meet the housing needs in the District. The policy also sets out a minimum density target of 30 dwellings per hectare to minimise the loss of greenfield land in the District. The policy does

also highlight that that there will be locations where lower densities are required.

6.25 Concerns were raised previously that the policy was overly restrictive in terms of the house types required. However the Council considers the Bromsgrove Housing Market Assessment provides compelling evidence for the need for smaller properties in the District. Therefore the policy has not fundamentally changed although the policy does now explicitly say that it is accepted that wider mix of houses would be required on larger sites.

6.26 A number of people felt that housing for the elderly was a major issue in the District that was not being addressed fully in the previous draft. To resolve this issue any reference to housing for the elderly has been removed from this policy so that it can be dealt with in a more comprehensive manner in a separate policy.

6.27 Concerns were highlighted over the locations where lower densities would be acceptable. It was interpreted by some that densities below 30 dwellings per hectare would only be acceptable in Barnt Green. To avoid this confusion the reference to Barnt Green has been removed from the policy. Whilst some felt that a list of low density areas should be provided the Council considered this would not be appropriate in strategic document and would also be inflexible.

6.28 CP7 Affordable Housing

6.29 This policy sets thresholds for affordable housing against which new development proposals will be assessed and also sets out the kinds of affordable tenures that will be required. It seeks to increase the annual provision of affordable housing in order to meet local needs.

6.30 Concerns were raised that the previous draft of the policy was not fully compliant with PPS3 and that further details on affordable tenures was required. This has been reflected in the amended version as the policy sets out a requirement for 75% social rented and 25% intermediate housing.

6.31 Some respondents felt that the policy was written in a restrictive way considering the current economic climate. However, the policy does highlight the potential for negotiation where it has been proved that 40% cannot be achieved.

6.32 The previous draft of this policy sought on site affordable housing on schemes of five or more units in 'envelope villages'. Respondents highlighted that this threshold was meaningless as only limited infill is permitted in such settlements. In response this part of the policy has now been removed and the Council is now seeking a contribution from all schemes that come forward regardless of size or location.

6.33 A number of respondents have highlighted the need for robust evidence to underpin the policy. Some modelling work was undertaken alongside the Housing Market Assessment to justify the 40% figure however further work has now been commissioned. This will ensure that the Council has a policy that is fully justified by robust evidence.

6.34 Respondents highlighted their general support for rural exception housing where a need had been identified and therefore the Council considered it necessary to expand the guidance on what is an important issue in the District. Concerns were raised over the listing of settlements where rural exception housing could be applicable and therefore to allow flexibility a list of settlements has been removed from this version.

6.35 CP8 Homes for the Elderly

6.36 The policy aims to provide adequate housing to meet the demographic trends of an ageing population. It encourages developers to build to 'Lifetime Homes' standards, as well as identifying suitable sites to provide for the development of residential care homes, close care, extra care and assisted care housing; and in particular Continuing Care Retirement Communities.

6.37 This is a new policy based a number of comments received as part of the Draft Core Strategy consultation in 2008. Many respondents felt housing should have a greater emphasis on the needs of the increasing elderly population, which was seen as a topic neglected in the previous draft. There were also comments that there should be policy regard given to building homes to 'Lifetime Homes' standards, the need for extra care development and extensions to care homes.

6.38 There is a considerable amount of demographic data indicating that nationally the country's population is ageing. It is expected that by 2026 older people will account for almost half (48 per cent) of the increase in the total number of households, resulting in 2.4 million more older households than there are today (CLG, 2008). Statistics from Worcestershire County Council show that across Bromsgrove it is predicted that the population over 65 will rise from its current figure of 20% of the population to 30% by 2026.

6.39 The District Level Housing Market Assessment (2008) identified large increases and demand for housing with care for older people, especially the oldest elderly. This assessment illustrated a need for 4,800 2 bed properties for people of retirement age and 1,575 properties for the older elderly. The Strategic Housing Market Assessment for the SHMA also indicated a rise in very elderly households and identified a need for accommodation for older people.

6.40 Based on the consultation comments and the wide ranging evidence, along with the Council's Sustainable Community Strategy 2010-2013

highlighting the need to care for older people in our communities, it was felt this topic should be given its own policy due to the importance of this issue across the District.

6.41   CP9 Accommodation for Gypsies, Travellers and Showpeople

6.42   This policy acknowledges the importance of providing adequate housing to cater for the needs of the District as stressed in PPS3 Housing which states Local Planning Authorities should plan for a mix of housing on the basis of the different types of household that are likely to require housing over the plan period, including gypsies and travellers.

6.43   Some minor wording amendments were suggested to this policy to ensure that sites had adequate drainage and also to ensure that the policy wording could not be misinterpreted. However, following some more general comments that some policies were more like development control criteria based policies rather than strategic policies the policy was re-written. The policy is now cross referenced with the development principles policy to ensure that any sites are sustainable, suitable and have sufficient infrastructure capacity.

6.44   CP10 Sustainable Communities

6.45   This policy seeks to ensure provision is made for services and facilities to meet the needs of the community. It will also seek to retain existing services and facilities that meet a local need or ensure adequate replacement is provided.

6.46   The provision of sustainable communities was supported throughout the 2008 consultation and therefore this policy has been kept and expanded upon. The original policy also included details on developer contributions, which respondents agreed was needed but should be given more weight in a separate policy. The Council has therefore created a Planning Obligations policy (CP24), and retained a separate policy focusing on sustainable communities.

6.47   The original policy was more concerned with the retention of existing local services and community facilities, whereas the updated policy expands on this by not only maintaining services but supporting the provision of new and improved services. The policy supports the Sustainable Community Strategy 2010-2013, which aims to strengthen communities by providing accessible, localised services.

6.48   The retention of this policy from the last Draft is fundamental in supporting sustainable communities and ensuring essential local community facilities are safeguarded, especially in the rural areas of the District.

6.49   CP11 New Employment

6.50   This policy promotes new employment development of various types in key locations around the District. The main focus is on Bromsgrove Town with employment development promoted in the Town Centre, the Technology Park and also the strategic sites. Some flexibility is provided for development in other areas to meet needs such as Longbridge and rural settlements. The policy acknowledges the importance of encouraging growth in new sectors and skills development.

6.51   Concerns were raised that the employment policy in the previous draft did not clearly distinguish between new and existing employment. To provide clarity there are now separate policies for new and existing employment.

6.52   Whilst some respondents felt that there should be more emphasis on rural employment this part of the policy has remained unchanged. A more strongly worded policy in favour of new rural employment could be contrary to Green Belt policy and therefore seen as contradictory to policy CP 22 Green Belt.

6.53   Some respondents highlighted the need for employment development on strategic sites on the edge of the Town. This has been added to the policy to ensure a mix of uses are provided on the strategic sites.

6.54   The Council intends to deliver 28 hectares of employment land. Evidence within the Employment Land Review and subsequent Employment Land Availability documents highlight the ability to deliver this is on sites with current commitments such as Bromsgrove Technology Park. The addition of some employment land on strategic sites provides some flexibility and will create more sustainable environments.

6.55   CP12 Existing Employment

6.56   The main purpose of this policy is to maintain and promote existing employment provision. The policy strives to protect existing employment land and lists the relevant criteria needed for non-employment uses to be considered.

6.57   One of the main comments made regarding employment in the Draft Core Strategy consultation (2008) was that more needed to be done to encourage and improve existing sites and businesses and employment land should be protected. As mentioned previously, many respondents felt that the policy could have a clearer distinction between new employment and existing employment. The Council have therefore created this new policy which concentrates on maintaining and promoting existing employment provision.

6.58   Nationally, employment sites are under increasing pressure to be developed for housing but it is important to retain existing employment sites where possible and appropriate. In Bromsgrove, employment site retention and provision is particularly necessary to enable balanced employment and housing growth, provide choices and reduce dependency on commuting to the West Midlands MUA. Furthermore these employment areas contain a range of sites and premises that meet the needs of the business community as identified within the Bromsgrove District Employment Land Review 2009.

6.59   The West Midlands Economic Strategy stresses the importance of building upon the region's strengths by promoting growth and development in existing businesses. The District Employment Land Review also recommended against releasing or de-allocating any existing Local Plan employment sites and main commitments.

6.60   Using respondent comments and a range of evidence, this new policy is segregated into two main parts. The first relates to safeguarding employment land and lists the important credentials that the Council will aim to keep within employment areas. The second section states the criteria that would be required to adequately demonstrate the loss of employment land for non-employment uses. This criterion has stayed the same as the original Draft Core Strategy as it sufficiently identifies what proposals are required to address for non-employment uses.

6.61   CP13 Rural Regeneration

6.62   The policy attempts to increase the social and economic well-being of rural communities. A list of development initiatives are stated which the Council will support to successfully regenerate the rural parts of the District.

6.63   This policy follows on from CP3 Rural Renaissance within the original Draft Core Strategy (2008). Bromsgrove is a predominately rural District containing a number of rural settlements. A policy on rural regeneration is fundamental to creating sustainable communities and aids the rural economy. Providing balanced growth opportunities to enable people to live and work in their own rural villages and the support of local services is a key recurring theme that comes through consultation with Bromsgrove's rural communities, as is the strong desire to retain the qualities of an attractive environment that define the character of the rural settlements and the District as a whole.

6.64   A number of respondents to the original Rural Renaissance policy criticised the lack of clarity that existed concerning the areas the policy applied to. There was a great deal of confusion with the settlements named as suitable exception sites and many believed this was overly restrictive in a District that is predominately rural in nature. Therefore, the list of settlements has been removed from this policy allowing

greater flexibility and to allow the policy to have a positive impact on a larger part of the District. The Council agreed with comments that rural communities should be able to meet their own needs, irrespective of their size, and therefore this policy was amended to cover all rural parts of the District. However, some comments stated that local need should only be met according to sustainability criteria, which is also reflected within this amended policy.

6.65   The Sustainable Community Strategy 2010-2013 highlighted the need to retain young adults in existing rural communities. Rural affordable housing was also supported within the consultation process and has been given greater clarity within the revised policy on affordable housing (CP7). This specific policy gives regard to CP7 by endorsing the use of rural exception sites.

6.66   The rural economy was somewhat neglected in the original Draft Core Strategy and many respondents felt there was not enough emphasis on farming and agriculture, which are key attributes of the District. In response to these comments, as well as additional responses on the need to promote rural employment, this policy has been modified to aid sustainable rural enterprises, live-work units, recreation and/or tourism initiatives and diversification of the rural economy. Sustainability credentials are also encouraged throughout the revised policy with improvements to public transport links and reductions in commuting.

6.67   CP14 Sustainable Transport

6.68   The policy aims to improve accessibility whilst encouraging more sustainable means of travel, such as cycling, walking and public transport and reducing the need to travel with initiatives such as home-working. It seeks to maximise use of Green Infrastructure for practical and recreational purposes. It also notes the importance of travel plans and transport assessments.

6.69   This policy was adapted and strengthened from the original Draft Core Strategy (2008), mainly based on consultation responses and evidence noted for consideration from these comments. There was too much emphasis on the regeneration of Bromsgrove Rail Station, neglecting other stations across the District. The updated policy background text now states that "Bromsgrove District Council will continue to work with Worcestershire County Council Transport Section and rail industry partners to improve facilities at railway stations across the District"

6.70   Public transport was the main topic of concern regarding sustainable transport and many respondents believed the original policy failed to fully address this problem especially in rural areas. The updated policy places more emphasis on this topic, fully supporting increased public transport usage as well as seeking developer contributions for investment in public transport.

6.71   There was no mention of freight movement mentioned in the original policy, which was viewed as a weakness by many respondents. To address this issue, the policy fully endorses the County's Multimodal Freight Policy and considers more sustainable transport modes for moving freight, such as by rail or water. There was not enough emphasis given in the original policy on the significance of travel plans so the policy has been updated accordingly to illustrate the importance of such plans.

6.72   The last major point raised by respondents was referring to the lack of mention to evidence base documents that would support the sustainable transport policy as well as the collaborative working between the Local Authority and a number of statutory consultees. The updated policy highlights the collaborative working with Worcestershire County Council and makes reference to a number of evidence base documents, including; the Worcestershire Local Transport Plan, the Integrated Passenger Transport Scheme and Rights of Way Improvement Plan.

6.73   CP15 Town Centre Regeneration

6.74   This policy reinforces the role of Bromsgrove Town Centre in providing adequate facilities to cater for the needs of the District. Alongside the AAP the policy promotes development opportunities for a range of uses and seeks improvements to public transport, the public realm and natural environments.

6.75   Respondents acknowledged that Bromsgrove Town is the major retail centre in the District and there was overwhelming support for the regeneration of the Town Centre. Some felt that the policy could go further in terms of highlighting the kinds of uses that could be promoted in the Town Centre. An improved night time economy and a café culture were favoured by some. The policy has been written flexibly to encourage a range of uses and attract inward investment.

6.76   Transportation issues were highlighted by a number of people and views were expressed concerning the poor links with the train station and traffic congestion. The policy aims to address these matters by improving links to the station and making highway improvements at key junctions.

6.77   CP16 Managing the Historic Environment

6.78   This policy acknowledges Bromsgrove's rich historic legacy and the importance of preserving and enhancing Bromsgrove's uniqueness for the enjoyment of future generations. It allows for the positive management of the historic environment through the encouragement of character appraisals and management plans in Conservation Areas, the reuse of historic buildings and the respect of heritage assets.

6.79 This policy follows on from the 'Managing Man Made Assets' Policy in the previous Draft Core Strategy. The title has been reworded following objections that the main policy focus was the District's historic environment and the title should reflect this. The main policy context has been revised in response to comments that there was too much repetition from regional and national policy.

6.80 The main criticism of the draft policy was it appeared too restrictive to development and should promote enhancement of historic assets instead of just protecting them. The updated policy has been adapted to be more supportive of the reuse of redundant historic buildings; the promotion of a positive interaction between historic sites/places and modern developments; and the encouragement of high quality contemporary developments in historic areas. Although there is support for positive development in the historic environment, the policy will ensure applications respect and reflect the importance of heritage assets and their role in the local community.

6.81 There were also a number of comments relating to the future management of historic assets and that this area was neglected in the previous policy. The updated policy advocates a holistic approach to the proactive management of the historic environment, as well as striving to produce character appraisals and management plans for designated Conservation Areas.

6.82 Another common theme throughout consultation comments was that the previous policy was generic and not locally characteristic of Bromsgrove District. Therefore new elements to the policy include the encouragement of Village Design Statements by the local community to promote local distinctiveness. Further studies will be undertaken to better understand the local identity and distinctiveness of the District, which in turn will inform local decision making and support the future growth of the Worcestershire Historic Environment Record. The previous policy failed to mention this as well as Historic Environment Assessments for the local area, which are given more prominence in the updated version.

6.83 CP17 Natural Environment

6.84 This policy seeks to protect and enhance the biodiversity, geodiversity and landscape characters in the District. The policy also ensures that locally important species and irreplaceable semi natural habitats are protected and that developments contribute towards meeting the targets set in the Biodiversity Action Plans and Geodiversity Action Plan.

6.85 The overall principles of this policy are supported by respondents. In response to the comments that the policy was too generic and should be more localised and strengthened, the policy now specifically requires developments to consider and contribute towards the

Worcestershire Landscape Character Assessment, the UK, Worcestershire and Bromsgrove Biodiversity Action Plan and Worcestershire Geodiversity Action Plan.

6.86   While some considered it important to expand the policy to protect and enhance natural assets/habitats that do not benefit from statutory protection, several private sector respondents considered it inappropriate to protect and enhance locally characteristic species unless they are statutory protected. As the Natural Environment and Rural Communities Act (2006) requires local authorities to have regard to the conservation of biodiversity in exercising their functions, it is considered necessary that the revised policy provides protection and enhancement to the locally important and valued natural assets.

6.87   A number of private sector respondents believe it is unrealistic for developments to demonstrate their support for geodiversity and biodiversity and where appropriate to manage them. They also criticised that there was no guidance as to what would be required or how proposals would be tested.   Two of the key principles of PPS9 require plan policies to maintain and enhance, restore or add to biodiversity and geological conservation interests, and promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development. A Green Infrastructure Baseline Report is now produced to give a snapshot of the Green Infrastructure assets, which include biodiversity, geodiversity and landscape character in the District. Ecological and geological evidence are also collected for the strategic sites in the District which also provide guidance on what the Council expects to see from developments on the strategic sites. More guidance will be available in the future from the sub-regional Green Infrastructure strategy which is now being developed by the Worcestershire sub-regional Green Infrastructure Steering Group.

6.88   Water related comments are addressed through the water management policy.

6.89   CP18 High Quality Design

6.90   This policy seeks to address issues faced by the District through design and aim to deliver locally distinctive, people focused developments. The policy also refers to several other well-established tools (the Building for Life, West Midlands Sustainability Checklist) and standard (Secured by Design) to help assess and deliver sustainable developments.

6.91   The high quality design policy received overwhelming support and many respondents agreed with the principles of good quality and eco-friendly design. As many of the principles in the previous policy are covered in the Building for Life and West Midlands Sustainability Checklist, and that some are addressed by other policies in the Core

Strategy, this policy is significantly revised and focuses on the wider urban design principles such as gateway locations, visual corridors and principles that help address the issues faced by the District such as following the HCA space standards and taking measures to address the potential impact of pollutions to occupants, wildlife and the environment.

6.92   Reduction of crime and the fear of crime and anti-social behaviour were identified as priorities in Bromsgrove. This policy now requires developments to meet the 'Secure by Design' standard as suggested by West Mercia Constabulary.

6.93   Other issues related to biodiversity, water, climate change, and open space are addressed through other policies such as the Natural Environment, Water Management, Climate Change Mitigation and Adaptation, and the Green Infrastructure policies.

6.94   CP19 Climate Change Mitigation and Adaptation

6.95   This policy seeks to mitigate the causes of climate change from developments and ensure developments be able to adapt to and minimise the potential loss from the impacts of climate change

6.96   In general this policy is supported, especially the overall concept of climate change.   A number of comments emphasised the positive aspects associated with the provision of renewable energy across the District. The changes to the building regulations and move to zero carbon buildings will push the boundaries of current energy efficiency and encourage decentralised and renewable energy. As a result, authority wide targets to secure decentralised energy supply to development will become unnecessary. Hence, the renewable energy target proposed is removed in the revised policy.

6.97   The requirement for developments to use zero or low carbon energy generation was also heavily criticised on viability grounds. Given that there is no firm plan about zero/low energy generation schemes in the District, it is accepted that this requirement needs revising. As many developments in the District fall within areas with only single source of energy supply (i.e. electricity and have no gas supply), it is considered that these developments are more vulnerable to the impacts of climate change and extreme weather. The Council therefore supports developments in these areas to incorporate zero/low carbon energy generation.   The UK is committed to reducing carbon dioxide emissions by 34% below 1990 levels by 2020 and seeks an 80% reduction in emissions by 2050. To ensure that developments contribute to the target, all developments fall within the catchment of a zero/low carbon energy scheme are expected to provide infrastructure/ to connect to the zero/low-carbon energy scheme. As all developments will need to be connected to utilities, it is not expected

that connecting to the zero/low-carbon energy scheme will create extra burden to the developments.

6.98   The requirement for developments to meet the Code for Sustainable Homes levels were criticised by developers on viability grounds. It is accepted that viability has to be taken into account, as a result of this, the Council will prepare site Masterplans or will seek to work with developers to decide the viability of meeting the equivalent level of the Code for Sustainable Homes set for social housing and the BREEAM 'very good' rating or above.

6.99   There was an agreed consensus that climate change adaption should be addressed and not just mitigation. As some of the adaptation to impacts of climate change are addressed in other policies (for example, flooding and drought are addressed in policy CP20 Water Management, wildlife migration is addressed in policies CP17 Natural Environment), based on the Planning for Climate Change in Worcestershire technical document produced by Worcestershire County Council, only impacts of climate change that are not addressed in other policies (that is heightened risk of subsidence and fire, and energy supply in rural areas) are covered in the policy.

6.100   Some respondents believed other factors could be included as part of the policy, for example the use of public transport combined with walking and/or cycling and the greater use of the natural environment and urban green spaces for mitigation and adaption of climate change. Given that climate change is relevant to almost all subjects, issues that are addressed in other policies (such as policies CP14 Sustainable Transport and CP18 High Quality Design) will not be repeated in the policy.

6.101   CP20 Water Management

6.102   This policy seeks to protect and minimise loss of developments from flooding, contribute to sustainable use of water resources and ensure developments protect/improve the water quality of watercourses. The policy also seeks flood control measures to maximise the opportunities for enhancing the natural environment and social well-being.

6.103   Some respondents considered the previous policy merely repeated National guidance with no specific relevance to Bromsgrove, whereas another comment considered the policy to be written contrary to PPS25. To address the issues faced by the District, the revised policy is divided into three main parts – water resources, flooding and water quality.

6.104   The Environment Agency commented that all development should be in Flood Zone 1 as development and service provision must ensure that communities and the environment are not adversely affected by flooding. Development in Flood Zones 2 and 3 should contribute

positively to reducing flood risk. In response to this comment, the policy now requires all developments to follow the flood risk management hierarchy and where developments in high risk areas are necessary, the designs, materials and escape routes of the developments should minimise the risk(s) and loss from flooding.

6.105   The Environment Agency also commented that watercourses should be managed and protected to ensure its biodiversity and flood control function and culverts should be re-opened/restored where possible. Flood control methods that work with the natural environment and soft engineering solutions to drainage are preferred. Other respondents considered that the policy will benefit if surface water flooding and flash flooding from ordinary watercourses are also covered. These helped to formulate the section of policy referring to flood risk management and flood control measures.

6.106   Some commented that the policy should have regard to relevant catchment management strategies and the Environment Agency commented that appropriate measures and infrastructure are essential and should be in place in tandem with development phases to ensure the water resources are protected. There were several comments mentioning that maintenance needs to be improved across the District in terms of drains and ditches. Ensuring there is adequate sewerage capacity and upgrading systems where required will reduce the risk of foul flooding and the associated costs and loss of amenity. These are all reflected in the revised policy, such as specific reference to the River Basin Management Plan and Water Framework Directives are included and phasing of development to be in line with the completion of the required infrastructure, etc.

6.107   In response to some comments on the CP1 Climate Change policy related to the provision of SUDs, the SUDS management train concept is now covered in the policy.

6.108   CP21 Green Infrastructure

6.109   This policy seeks to safeguard existing Green Infrastructure assets and to deliver high quality, multifunctional, green space that improves connectivity within and beyond the District boundaries. The policy also sets out the quantity, quality and accessibility standards for different types of green space which the Council expects developments to meet.

6.110   A large number of respondents believe there is insufficient open space and recreation across the District, and are in agreement that this provision needs to be greatly improved.   Some considered that reference to achieving local standards should be clarified. The Green Infrastructure policy therefore includes the quantity, quality and accessibility standards of different types of green space identified in the Open Space, Sports and Recreation (PPG17) Study. This is expected to give higher certainty to developers.

6.111 There is a general concern from the private sector that provision is not always possible on smaller sites and provision should only be generated on developments that actually need open space. However, it is unlikely that a development would not lead to any quantity, quality or accessibility requirements nor management or maintenance of existing facilities.

6.112 There was support to link open spaces with green corridors, but green Infrastructure should be explored in more detail, acknowledging intrinsic biodiversity value and also noting that not all spaces are suitable for a transport or amenity role. As a result, the phrase "no unacceptable conflicts in terms of their conservation requirements will result" is now included in the policy.

6.113 Some considered that the policy should refer to other adopted standards or strategies (such as the Woodland Access standards, Worcestershire Countryside Access and Recreation Strategy). The Worcestershire Sub-regional Green Infrastructure Steering Group is formed by which relevant stakeholders such as Natural England, the Worcestershire County Council, Forestry Commission, Woodlands Trust, Worcestershire Wildlife Trust, English Heritage are all involved in developing a sub-regional green infrastructure framework. It is anticipated that all the adopted standards and strategies will be taken into account in the framework; hence reference to the sub-regional Green Infrastructure framework is included in the policy.

6.114 CP22 Green Belt

6.115 The policy aims to protect the Green Belt but also highlights the types of uses and developments that are acceptable in Green Belt locations. The policy reflects the advice contained within PPG2.

6.116 There was not a Green Belt policy within the previous draft of the Core Strategy but following consultation responses it was considered necessary to include one. Responses received to the Redditch growth consultation highlighted the importance people attach to the Green Belt and its continued protection. Respondents to the Draft Core Strategy expressed the need for Green Belt alterations to permit housing and employment development. It was considered necessary to reaffirm the role of the Green Belt and also highlight that changes to boundaries are unlikely to be required before 2021.

6.117 The potential changes to the planning system and the introduction of National Policy Statements were another reason for the inclusion of this policy. As there is potential uncertainty over the future of PPG2 it was considered necessary to have a strong local policy on Green Belts as the District is 91% Green Belt.

6.118 CP23 Health and Well-being

6.119 The overall aim of this policy is to promote healthier lifestyles for the District's residents. The first part of the policy ensures existing recreational and amenity assets are protected or enhanced, whilst also providing additional assets. The second part of the policy supports a number of initiatives that will provide healthy and active lifestyles.

6.120 This new policy stems from comments relating to the Open Space and Recreation Policy in the original Draft Core Strategy (2008). The main cause for concern was the insufficient open space and recreation across the District and many respondents thought it should be improved. This policy stresses the importance of protecting, retaining and enhancing existing recreational and amenity assets, increasing access to such assets, as well as supporting the provision of additional assets.

6.121 Respondents thought Green Infrastructure should be given more prominence in the Core Strategy and therefore the Open Space and Recreation Policy was segregated into two separate policies; CP21 Green Infrastructure and CP23 Health and Well-being

6.122 The policy specifically links to Strategic Objective 7 regarding the promotion of active, healthy lifestyles. Over the last few years, the health of the population and particularly increases in obesity has become national concerns. Obesity increases the risk of Type 2 diabetes, cardiovascular disease, joint disease and some cancers. The increase in obesity has been most marked amongst children and has trebled over the last twenty years. The significance of these trends is reflected in the growing government attention given to childhood obesity, highlighted most recently within 'Healthy Weight, Healthy Lives: A Cross Government Strategy for England' (2008), the Public Health White Paper 'Choosing Health: Making Healthier Choices Easier' (2004) and the National Service Framework (NSF) for Children, Young People and Maternity, which recognises the importance of promoting health and well-being, intervening early and supporting parents.

6.123 The use of the planning system is reinforced as part of the Worcestershire PCT Childhood Obesity Strategy (2008), as it indicates local planning and policy decisions have a strong impact upon the preservation of green spaces, healthy public facilities and neighbourhoods and the provision of physical activity opportunities. In addition, local authorities can use existing planning powers to control more carefully the number and location of hot food takeaways in their local areas. The original Draft Core Strategy received a number of responses that healthy living should be promoted in Bromsgrove and there was particular concern regarding the number of hot food takeaways across the District and their detrimental effect on residents' health. In response to these comments and as a consequence of increases in obesity levels, this policy seeks to reduce the over-

concentration of any use type where this detracts from the ability to adopt healthy lifestyles - most notably A5 uses (hot food takeaways).

6.124   The policy actively links with other policies, such as Sustainable Transport (CP14), by promoting high-quality walking and cycling routes. There is also positive support for local food growing initiatives which will encourage the provision of healthier food from more sustainable locations.

6.125   CP24 Planning Obligations

6.126   The policy highlights that development proposals will need to contribute to the provision of facilities, services and infrastructure that are judged necessary to make a scheme acceptable in planning terms. The policy highlights a number of areas where contributions could be sought.

6.127   In the previous draft of the Core Strategy the issue of planning obligations were dealt with in the Sustainable Communities policy however respondents felt that the planning obligations should be addressed separately. This led to the creation of this policy.

6.128   The idea of seeking planning obligations was generally supported by respondents however concerns were raised over wording in the previous Sustainable Communities policy that stated 'all development should achieve a net benefit to the local community'. Some thought it was unclear how this could be measured and while others considered that where developments had a neutral impact this should also be acceptable in planning terms. This text has therefore not been included in the new policy.

6.129   General Comments

6.130   A number of responses were received in relation to document as whole and also additional policies that could be added. Where appropriate changes were made to reflect these comments.

6.131   Some respondents felt that there was too much jargon used and the document as whole was difficult and confusing to read with too much repetition. To address this matter a glossary has been added as an appendix to explain any technical terms. To give the document greater clarity the order of policies within the document has changed. For example all of the housing policies are now located within the same chapter.

6.132   Concerns were raised over the repetitive nature of the document. Policies were checked and amended where appropriate to ensure different policies were not too similar. For example the policy on the scale of housing highlighted the need for mix houses even though this was addressed in the size, type and tenure of housing policy. Subsequently the policy on the scale of housing has been removed

and many of the criteria have helped to form the development principles policy. It should be noted that in some cases policies do overlap however this is necessary to have coherent policies that sit together within the document. Where appropriate repetition of national planning policies have been removed but in some instances it has been considered to have repetition to ensure a policy vacuum is not created when PPSs and PPGs are replaced by National Policy Statements.

6.133 Some concerns were raised that the document did not have a clear strategy to deliver the vision. To ensure that the Council's strategy is clear the housing target of 4,000 to 2021 has been identified along with the suitable sites that will deliver the target.

6.134 Many respondents thought that a settlement hierarchy should be included. This has duly been added and provides clarity as to what types of development could be acceptable in particular settlement types. Policies on the Green Belt CP22 and Housing for the Elderly CP8 have also been added to fill gaps that were identified by respondents.

6.135 Conclusions

6.136 This document seeks to demonstrate how the Draft Core Strategy 2 has evolved following consultation feedback from the earlier draft. It describes consultation methods used, who we consulted and attempts to summarise in key points the responses received. Not all changes suggested by respondents could be incorporated into the document due to either conflict with local evidence or national policy but wherever possible such changes have been incorporated.

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

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

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Bromsgrove District Council
Draft Core Strategy 2 Consultation Statement

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