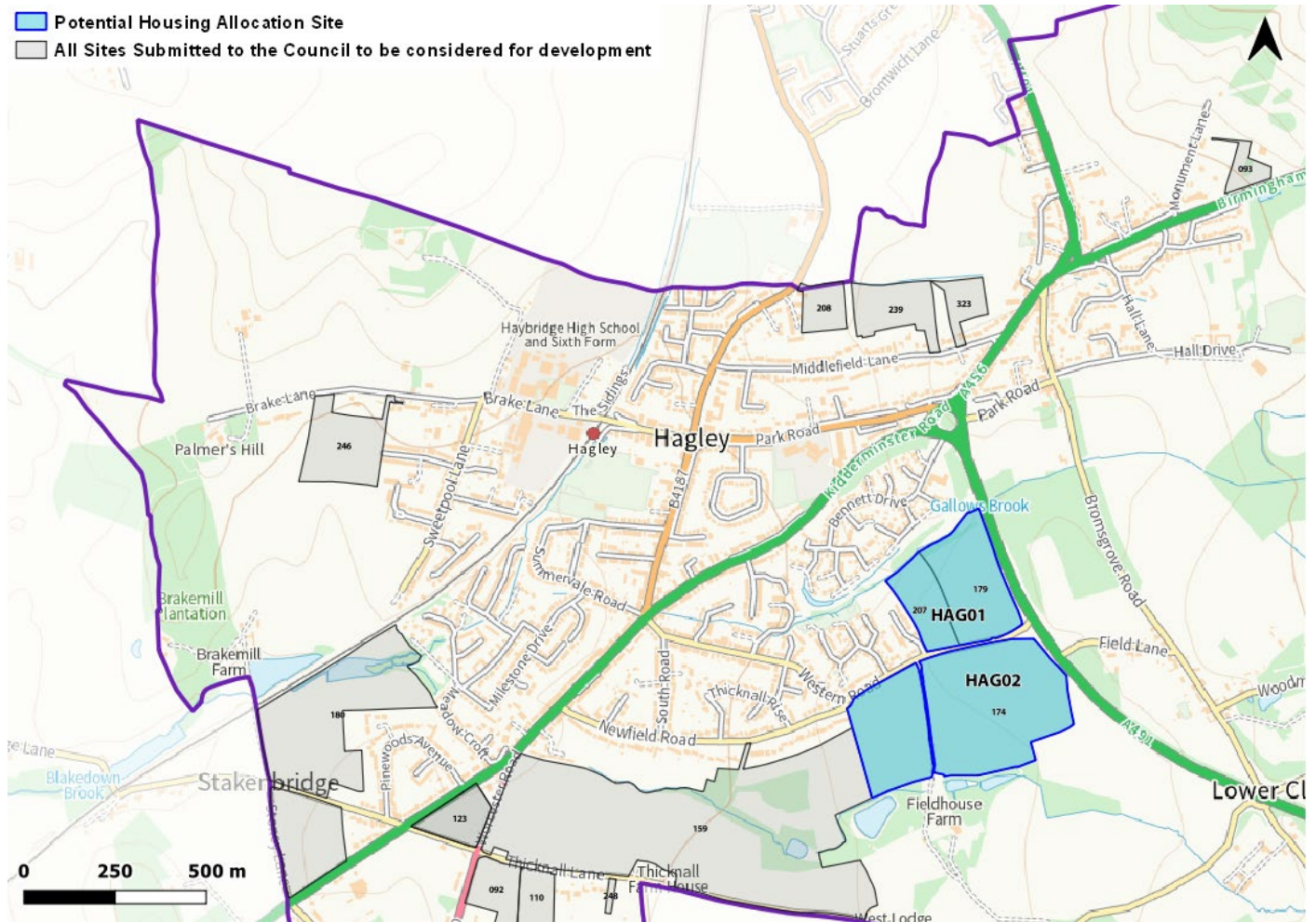


Settlement Summary: Hagley



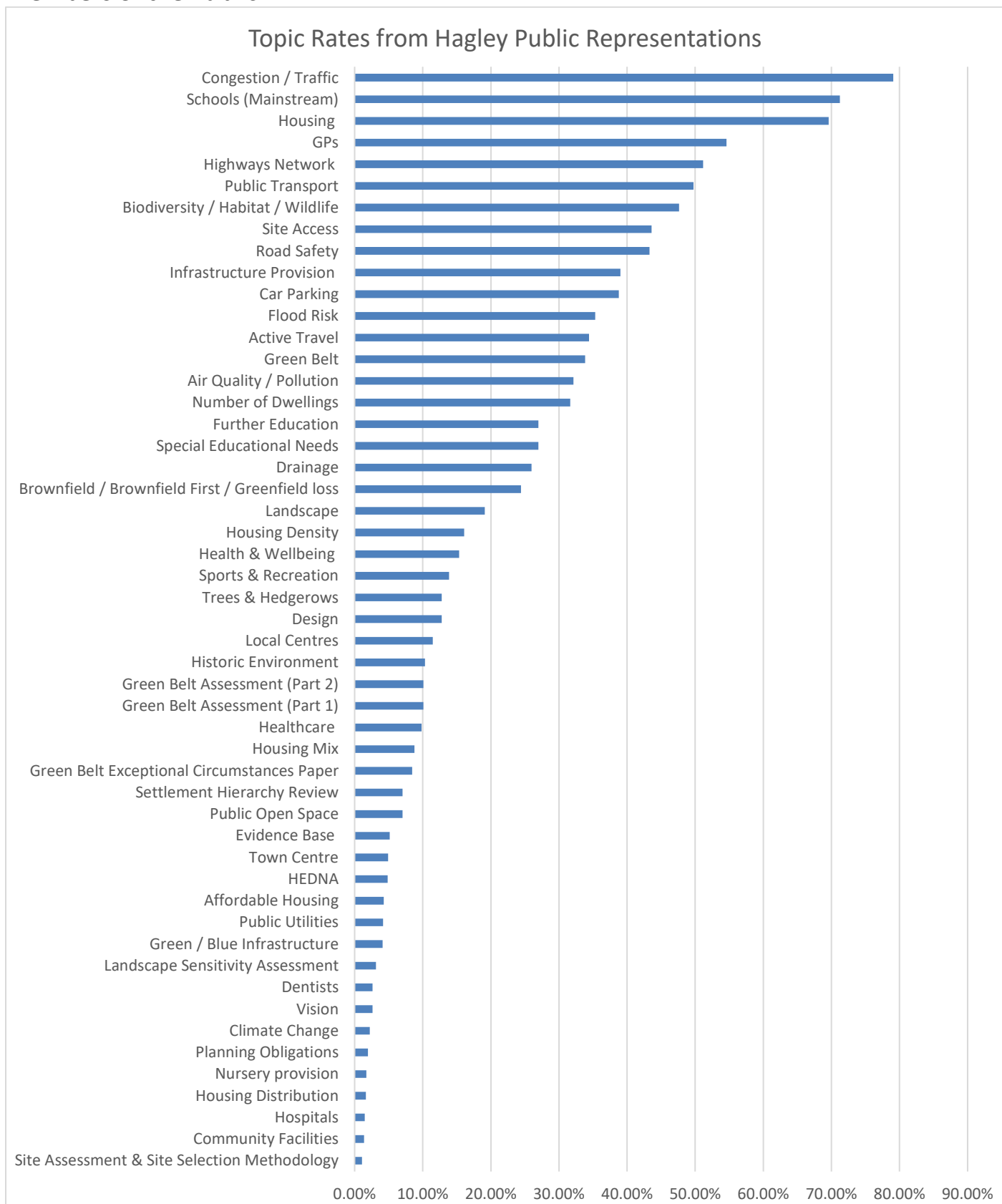
Introduction

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

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

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

Members of the Public



**Members of the Public:
Settlement-wide – Topics**

Congestion/Traffic/Road Safety: Universally cited as one of Hagley’s biggest constraints. Residents highlight that the A456, A491 and Worcester Road are at capacity with gridlocks daily. There are frequent accidents at A491/Western Road and A456/Newfield Road. Western Road and Newfield Road are used as rat-runs making them unsafe and congested. Fear that development could add approximately 1,000 vehicles on the road network, worsening congestion, safety and air quality.

Schools (mainstream): Hagley Primary School is already a three-form entry (3FE) and it is believed that it cannot expand further. Additionally, Haybridge High School & Sixth Form and Hagley Catholic High School are at/near full capacity and have unsuitable/unsafe accesses. There are numerous reports of traffic and parking issues around Park Road, Worcester Road, Station Road and Brake Lane related to the schools.

Housing: Strong concerns about the scale of 530 new houses in the village. The development is disproportionate and would impact the distinctive character and strong sense of community in the village. Hagley has already absorbed significant development (most referring to the Cala development) that has overburdened infrastructure within the village.

GPs: Hagley Surgery is reported to be over capacity with over 9,000 patients and long waits to see a doctor. The practice lacks space to expand and parking is already inadequate. There are fears that 530 homes planned for Hagley would overwhelm Hagley Surgery. A new doctors surgery is requested to support any new development.

Public transport: Some have noted a reduced train frequency from Hagley Train Station and often trains are cancelled at short notice. Often the services are overcrowded. It is reported that only 6-10% of Hagley residents use the train. Buses from Hagley are infrequent and not suitable for commuters.

Biodiversity/Habitat/Wildlife: Concern about impacts to wildlife corridors supporting species such as bats, badgers, deer, owls, red kites, skylarks, newts and lapwing.

Car parking: Frequent point that the village does not have enough car parking, with the Worcester Road village car park frequently full. In addition, Hagley Train Station has limited spaces, with the car park often full by 8am. Some have noted a change in parking behaviour since the introduction of car parking charges at Hagley Train Station, with some travelling to Stourbridge Junction for free car parking. Development would exacerbate existing parking constraints.

Flood risk/Drainage: Many residents believe Hagley West lies within Flood Zone 3. Concerns that new development would worsen surface water runoff and sewer capacity, with some noting that the Cala estate worsened flooding and caused sewage spills. Some are concerned about the impacts of new development on Gallows Brook and Mill Brook networks.

Active travel: There are no dedicated cycleways, and footpaths are narrow and poorly maintained, discouraging walking and cycling.

Green Belt: Resistance to Green Belt loss and identification of HAG01 and HAG02 as grey belt. Fear of loss of separation and urban sprawl towards Clent and Pedmore, with some concern about development between Hagley and Pedmore in Dudley Borough and the cumulative impact of developments in and around Hagley.

Standout / unique insights raised

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

- Infrastructure Delivery Plan: The Plan contains little commentary on the proposed infrastructure that would accompany the proposed development. Essential that any development within Hagley comes with an Infrastructure Delivery Plan.
- Specific alternative development sites: Some residents suggested alternative development sites, such as fields between Fig & Favour and Webbs Garden Centre. However, generally residents wanted to see the use of brownfield sites outside of Hagley used first.
- Emergency services: More development would stretch the emergency services who are reported to have slow response times. Additionally, emergency vehicles are already restricted by congestion.
- Housing mix: Hagley needs affordable 1-2 bedroom properties, not 3-5 bedroom executive properties. This would also allow first time buyers and residents to downsize and stay in Hagley.
- SEND provision: Schools in Hagley are not able to support SEND children due to difficulty in recruiting teachers.

Members of the Public:

HAG01 – Key Points

Congestion/Traffic/Site access: The A456 and A491 are congested and already at capacity. The A491 junction with Western Road is dangerous and there are many recorded accidents. Western Road and Newfield Road are semi-rural roads which are being used as a rat-runs between the A491 and A456 and are not designed for through traffic. The A491/Western Road and A456/Newfield Road junctions would need improving to provide suitable and safe accesses.

Additionally, the local road network around the three schools in Hagley, including Park Road, Worcester Road, Station Road and Brake Lane are frequently raised to be heavily congested and not safe.

Schools (Mainstream): Hagley Primary School, Haybridge High School & Sixth Form and Hagley Catholic High School are considered to be at capacity. Between HAG01 and HAG02, the number of pupils generated from these sites would require new schools on or near the site. No provision has been made to accommodate them which risks displacing local children and compromising educational standards.

Healthcare: Hagley Surgery is reported to be over capacity with over 9,000 patients and long waits to see a doctor. The practice lacks space to expand and parking is already inadequate. There are fears that 530 homes planned for Hagley on HAG01 and HAG02 would overwhelm Hagley Surgery. A new doctors surgery is requested to support any new development.

Flood risk: The site borders Gallows Brook. Development would increase hardstanding and create more runoff with many pointing to the increase frequency of flooding following the Cala development. Appropriate flood risk mitigation would be required. Many residents believe Hagley West lies within Flood Zone 3.

Biodiversity/Habitat/Wildlife: Concern about impacts to wildlife corridors supporting species such as bats, badgers, deer, owls, red kites, skylarks, newts and lapwing which would be permanently lost. Biodiversity should be protected and enhanced.

Public transport and active travel: Some residents note that the site is too far from the village centre, schools and Hagley Train Station for people to realistically walk, thereby the opinion is that the residents will be car dependent and worsen the parking situation in the village centre. In addition, the walking and cycling routes are considered to be impractical and unsafe.

Members of the Public:

HAG01 – Key Points

Green Belt: Concerns raised about harm to the Green Belt and that development of the site would conflict with the purposes of the Green Belt, including sprawl and safeguarding the countryside from encroachment. Development would erode Hagley’s rural identity. Emphasis on the use of brownfield sites first. Some residents note that no Green Belt Assessment has been undertaken to identify the site as grey belt.

Recreation: The site is used by the local community for leisure activities such as walking, dog walking and running which supports physical and mental well-being.

Comparison to HAG02: Given the spatial relationship, a number of the matters raised by the public apply to HAG01 and HAG02. However, some residents note that HAG01 is more suitable for housing even if they do not wish for the site to be considered for development.

Members of the Public:

HAG02 – Key Points

Agricultural land: Residents note the Site Assessment and Site Selection Methodology that identifies the site as graded as 1 (excellent) and 2 (very good) of the Agricultural Land Classification. Development would cause the loss of best and most versatile agricultural land, compromising food security.

Landscape sensitivity: Residents point out that the site has a high/medium sensitivity to housing according to the Landscape and Visual Sensitivity Assessment. Residents are concerned that development of the site would affect the character of the village.

Green Belt: Concerns raised about harm to the Green Belt and that development of the site would conflict with the purposes of the Green Belt, including sprawl and safeguarding the countryside from encroachment. Development would erode Hagley’s rural identity. Emphasis on the use of brownfield sites first. Some residents note that no Green Belt Assessment has been undertaken to identify the site as grey belt.

Residents point out that Site 174 (HAG02) is identified as amber (moderate harm if the parcel was released from the Green Belt for development) in respect of Green Belt harm in the Site Assessment and Site Selection Methodology.

Congestion/Traffic/Site access: The A456 and A491 are congested and already at capacity. The A491 junction with Western Road is dangerous and there are many recorded accidents. Western Road and Newfield Road are semi-rural roads which are being used as a rat-runs between the A491 and A456 and are not designed for through traffic. The A491/Western Road and A456/Newfield Road junctions would need improving to provide suitable and safe accesses.

Additionally, the local road network around the three schools in Hagley, including Park Road, Worcester Road, Station Road and Brake Lane are frequently raised to be heavily congested and not safe.

Schools (Mainstream): Hagley Primary School, Haybridge High School & Sixth Form and Hagley Catholic High School are considered to be at capacity. Between HAG01 and HAG02, the number of pupils generated from these sites would require new schools on or near the site. No provision has been made to accommodate them which risks displacing local children and compromising educational standards.

Public transport and active travel: Some residents note that the site is too far from the village centre, schools and Hagley Train Station for people to realistically walk, thereby the opinion is that the residents will be car dependent

Members of the Public:

HAG02 – Key Points

and worsen the parking situation in the village centre. In addition, the walking and cycling routes are considered to be impractical and unsafe.

Healthcare: Hagley Surgery is reported to be over capacity with over 9,000 patients and long waits to see a doctor. The practice lacks space to expand and parking is already inadequate. There are fears that 530 homes planned for Hagley on HAG01 and HAG02 would overwhelm Hagley Surgery. A new doctors surgery is requested to support any new development.

Flood risk: Many residents believe Hagley West lies within Flood Zone 3 and that development of the site would increase surface runoff leading to increased flooding. The site is used to mitigate flooding from the Clent Hills. No flood risk mitigation has been identified.

Biodiversity/Habitat/Wildlife: Concern about impacts to wildlife corridors supporting species such as bats, badgers, deer, owls, red kites, skylarks, newts and lapwing which would be permanently lost. Biodiversity should be protected and enhanced.

Recreation: The site/area is used by the local community for leisure activities such as walking, dog walking and running which supports physical and mental well-being.

Heritage: A housing development would be harmful to the setting of the Grade II* listed Field House, Grade II listed Orangery and associated curtilage listed buildings.

Examples of suggested specific infrastructure requirements

- **Road improvements:** Major highway improvements along the A456 and A491 corridors. In addition, redesign of the junctions at A491/Western Road and A456/Newfield Road. Traffic calming measures have been suggested to deter rat-running on Western and Newfield Roads.
- **Active travel infrastructure:** Existing walking and cycling routes to the village centre are considered to be impractical and unsafe, so safe pedestrian and cycle routes to the village centre, schools and train station are necessary to help deter vehicular use.
- **Public transport:** Improvements to the bus service and train service reliability.
- **Car parking:** New car parking provision to serve the village centre facilities/services and Hagley Train Station.
- **Education:** Subject to expansion potential at Hagley Primary School, Haybridge High School & Sixth Form and Hagley Catholic High School, new schools are required with the public of the view that expansion is not feasible.
- **Healthcare:** New doctors surgery to serve the village with Hagley Surgery deemed to be oversubscribed and it lacks room for expansion.
- **Drainage:** upgraded/new sewers noting that residents experience spills.

Across the majority of responses from the public was the message that Hagley cannot sustainably accommodate the level of development proposed on HAG01 and HAG02 without significant infrastructure investment. Many feel that the existing infrastructure in the village is at its limit, with the Cala development contributing towards the pressure experienced. Residents would expect suitable new schools, a doctor's surgery, public car parking, public transport

improvements, active travel connections and road improvements to be provided in an appropriate timeframe in line with any new development.

Statutory Consultees and Other Stakeholders

Statutory Consultees and Other Stakeholders:

Settlement-wide – Key Points

CPRE

- Hagley suffers from continuous heavy traffic, being located at the crossroads of A456 and A491.
- Limited school capacity.
- Limited healthcare capacity.
- Railway station remote from proposed development sites. Limited car parking.
- Hagley has a need for smaller housing, suitable for down-sizing and first time buyers.
- Narrow Green Belt gap separating Hagley from Pedmore/Stourbridge, which CPRE considers crucial to retain.

Dudley MB Council

DMBC notes the proximity to several housing allocations to Dudley borough – these being potentially up to 3,500 homes in Hagley and Frankley. Development of this scale will have implications upon transport, active travel and social/community related infrastructure.

DMBC requests that any land allocations proposed in Hagley and Frankley and elsewhere in proximity to Dudley's boundaries fully consider the impact on the landscape, historic environment and nature conservation.

Hagley Community Association for Hagley Community Centre

HCA's focus is on ensuring that community facility funding (via s106 contributions) is secured if housing growth proceeds in Hagley.

Hagley Patient Participation Group

GP Surgeries Cannot Expand or Absorb Growth

- Hagley Surgery currently has 9,800 patients.
- Allocating 530 houses could add 1,350+ additional patients.
- The surgery is landlocked, has a long-term lease, and has no room to expand.
- Parking is extremely limited and already causes operational issues.

Section 106 Developer Contributions Will Not Solve the Problem

- GPs are independent contractors, not NHS employees.
- Expansion/new buildings require Integrated Care Board (ICB) approval.
- S106 funds will never cover full build or operational costs.
- A new medical centre could require £1 million per year for 5 years to remain viable.

A Second GP Surgery in Hagley Would Be Harmful

- Senior GP leadership opposes a second surgery, especially on Hagley's outskirts.
- It would create a "two-village centre", fragment services, and be inefficient.
- NHS funding constraints mean it would not be viable.

Statutory Consultees and Other Stakeholders:

Settlement-wide – Key Points

Hagley Infrastructure Cannot Support Additional Housing

- Village roads already over capacity, especially Station Road and the village centre.
- Car dependency is high; new patients will likely drive to the surgery.
- Hagley already absorbs spill-over patients from:
 - Blakedown
 - Stourbridge
 - Pedmore (future Dudley Local Plan growth)

Risk of Patient List Closure

If new housing goes ahead without guaranteed funding:

- Hagley Surgery may have to close its patient list to new residents.
- This would force patients to seek healthcare in other towns—contrary to NHS sustainable access requirements.

Hagley Primary School

The school is currently operating at full capacity, with increasing pressure for places. It is our strong position that a strategic expansion of the existing school is the most effective, efficient, and community-cohesive response, rather than constructing a new, smaller school within the village.

Current Position

- **School Capacity:** ~680 pupils (Full), with a waiting list exceeding 20.
- **Staffing:** Over 140 staff; current on-site parking provision is inadequate.
- **Nursery Provision:** Age range now extended to 3–11, with a thriving Nursery.
- **Temporary Measures:** A modular cabin was recently approved to support an expansion of before and after-school care

Anticipated Growth

- **Immediate Projections:** Approximately 210 additional primary-aged children, necessitating 7 new classes.
- **Longer-Term Pressure:** Potential for 530 new homes in the village, placing further demand on school places.
- **Community Demand:** 37% of Hagley residents moved to the area due to the quality of local schools.

Preferred Strategy: Expansion of HPS

Hagley Primary School preferred option would be to:

- Expand to a PAN of 120, becoming a four-form entry primary school
- Retain and develop provision on its existing site
- Avoid the establishment of a second primary school within the village

Requirements for Expansion

- **Facilities:** Minimum of 7 new classrooms, with toilets, storage, and flexible learning areas.
- **Staffing:** Additional 14+ staff, with increased demands on staff spaces and welfare facilities.
- **SEND Provision:** Expansion of inclusive provision required.
- **Outdoor Space:** Vital to retain sports fields – essential for pupil health and well-being. Sport England is likely to oppose any loss of sports provision.
- **Feasibility Study:** A formal study is required to assess site suitability and cost implications.

Infrastructure Concerns

- **Traffic & Safety:**

Statutory Consultees and Other Stakeholders:

Settlement-wide – Key Points

- Village roads already struggle with congestion and unsafe parking.
- Conflict between pedestrians, families, and HGV/delivery traffic.
- Increased enrolment would worsen these issues without intervention.
- **Parking:**
 - On-site parking insufficient for current staff.
 - Overflow parking impacts residents on Park Road, Lodge Crescent, and further afield.
- **Active Travel Needs:**
 - Coordinated investment needed in cycling and pedestrian routes to support sustainable travel.
 - Essential if nearby developments (e.g. Pedmore Green Belt) go ahead.
 - Lack of action risks creating unsustainable and unsafe travel patterns

NHS – Herefordshire and Worcestershire Integrated Care System

Core message: New housing in Bromsgrove District will significantly increase demand on healthcare services. Without developer-funded mitigation, health services will be unable to cope, making development unsustainable.

No Hagley-specific comments received.

WCC Education

Hagley: Based on consultation for 530 dwellings in Hagley

- Clent Parochial Primary, Heybridge High
- EY = 59 FTE, Primary = 26 PYG, Secondary = 21 PYG
- Primary = 0.9 FE (1) expansion depending on feasibility, Secondary = 0.7 FE potential solution is subject to detailed assessment including neighbouring authorities

Statutory Consultees and Other Stakeholders:

HAG01 – Key Points

Historic England

No different comments to put forward in respect of the historic environment from those set out in the initial site assessment information.

National Trust

- No objection regarding short-range views from Clent Hills.
- Some concern about long-range visibility.
- Requires landscape and visual impact assessments.
- Clent Hills must be considered a key receptor.

Natural England

Natural England are happy with the allocation and that it does not have an impact on any protected sites/landscapes nearby

North Worcestershire Water Management

Statutory Consultees and Other Stakeholders:

HAG01 – Key Points

Flood Risk & Drainage

- Northern boundary defined by Gallows Brook (designated main river).
- Site lies largely in Flood Zone 1 (low fluvial risk).
- Clear surface water flow path in the southern part around Western Road—must be incorporated into the design.
- No recorded historic flooding on the site, but flooding has occurred nearby.

SuDS Requirements

- Drainage must comply with 2025 Defra National Standards for SuDS.
- Must incorporate:
 - Rainwater harvesting
 - Above-ground multifunctional SuDS
 - Water-quality treatment measures
- Phased development requires an overarching drainage strategy.
- Soilscape data suggests freely draining soils, infiltration likely feasible (subject to ground investigations).

Ecology & BNG

- Ditches and ponds must be retained with buffers.
- Engineered cascade near eastern boundary (likely takes runoff from A491) must also be retained.
- Watercourse along the northern boundary is of high distinctiveness:
 - Requires a river condition assessment by an accredited surveyor.
 - Riparian zone (10 m) must be surveyed and protected.
 - BNG units for the brook must be delivered on site.
- Recommendation to include blue corridors and manage Himalayan balsam.

WCC Planning and Transport Planning

Landscape:

Woodland is a key feature of the landscape setting for all three proposed allocations at Hagley. Permeable Green Infrastructure design should ensure the woodlands are functionally linked.

Ecology:

If development were to happen at HAG01, WCC Ecology team recommend that the development must take account of or include delivery of a substantive contribution towards the Draft LNRS's objectives.

Specifically, we recommend the creation of species-rich neutral grassland (PM29) in the western half of the proposed site.

This would be an ideal on-site contribution towards any development's statutory BNG requirement, as well as helping to provide Green Infrastructure for both HAG01 and HAG02 sites.

Worcestershire Regulatory Services

Contaminated Land:

No CL sites and not within 250m of landfill or unknown filled ground. Historical maps show the parcel to comprise agricultural fields.

Nuisance/Noise:

Statutory Consultees and Other Stakeholders:

HAG01 – Key Points

Site adjacent to A491 with high noise levels likely. Site will require full acoustic noise assessment and good acoustic design but should be developable. Note site to north has substantial buffer to road.

Air Quality:

No adverse comments

Worcestershire Wildlife Trust

- Delivery of well-considered and effective Green and Blue Infrastructure will be essential across all sites and should be a central consideration in all allocations in this area.
- It will also be essential to undertake further ecological assessment of the sites prior to their formal allocation.
- HAG01 contains parcels of grassland that may be unimproved. If confirmed as *priority habitat*, this would constrain development and reduce the developable area.
- HAG01 close to semi-natural features that will require buffering from adverse impacts.
- Nearby small waterbodies will need careful hydrological and pollution-control consideration.
- Sensitive SUDS design will be required, likely reducing the developable land.

Statutory Consultees and Other Stakeholders:

HAG02 – Key Points

CPRE

HAG02 must include a spine road. This would enable a future Hagley bypass—the only viable solution to Hagley’s severe traffic problems.

Historic England

Field House Farm (Grade II*) is highlighted as a sensitive heritage receptor and requires further consideration in terms of the sensitivity of its landscape setting and requires a detailed heritage/setting assessment.

National Trust

HAG02 is acceptable in principle, provided:

- It includes robust green infrastructure and public access corridors.
- It maintains and enhances links to Clent Hills.
- It does not obstruct PRow or landscape connectivity.
- It is subject to appropriate landscape and visual assessment, including views from Clent Hills.

NT would not support HAG02 if:

- Development design/layout disconnects the site from the wider natural environment.
- Green infrastructure and connectivity obligations are not met

Natural England

Natural England are happy with the allocation and that it does not have an impact on any protected sites/landscapes nearby

North Worcestershire Water Management

Flood Risk & Drainage

- Low fluvial and surface water flood risk, but historic flooding cannot be ruled out.

Statutory Consultees and Other Stakeholders:

HAG02 – Key Points

- Borders a sensitive watercourse—ecological corridor (Mill Brook).

SuDS Requirements

- Must comply with 2025 Defra SuDS standards.
- Infiltration SuDS likely feasible.
- Ensure strategic drainage planning if phased.

Ecology & BNG

- Watercourse designated high distinctiveness, requiring rigorous assessment.
- BNG gains for the brook must be delivered on site.
- Riparian zone (10m) must be protected.
- Retain all ditches and ponds.
- Include green and blue corridors.
- Must incorporate invasive species management.

WCC Planning and Transport Planning

Landscape:

Woodland is a key feature of the landscape setting for all three proposed allocations at Hagley. Permeable Green Infrastructure design should ensure the woodlands are functionally linked.

Ecology:

- Riparian habitat required along its southern boundary.
- GI must function jointly with HAG01, particularly through species-rich grassland and connectivity.

Landscape:

- Woodland connectivity is key; HAG02 must be designed to link woodland features across Hagley.

Transport:

- HAG02 must demonstrate sustainable access, reduced car dependency, and integration with active travel.

Worcestershire Regulatory Services

Contaminated Land:

No CL sites identified in relation to the site. Appears to be agricultural land. Feature highlighted offsite to the southwest as unknown filled ground but appears related to sluice / drainage and unlikely to represent a significant concern.

Nuisance/Noise:

Site adjacent to A491 with high noise levels likely. Site will require full acoustic noise assessment and good acoustic design but should be developable.

Air Quality:

No adverse comments

Worcestershire Wildlife Trust

- Delivery of well-considered and effective Green and Blue Infrastructure will be essential across all sites and should be a central consideration in all allocations in this area.
- It will also be essential to undertake further ecological assessment of the sites prior to their formal allocation.
- HAG02 may contain or be adjacent to priority habitat. If confirmed as *priority habitat*, this would constrain development and reduce the developable area.
- HAG02 close to semi-natural features that will require buffering from adverse impacts.
- Nearby small waterbodies will need careful hydrological and pollution-control consideration.

Statutory Consultees and Other Stakeholders:

HAG02 – Key Points

- Sensitive SUDS design will be required, likely reducing the developable land.

Developers/Landowners

Developers/Landowners:

HAG01 Site Promoters – Key Points

Define obo Ashberry Strategic Land and Bloor Homes Western (Sites 179 and 207)

- Council Vision is too broad and local plan vision should place strong emphasis on housing delivery, particularly affordable housing, in response to the housing crisis.
- Support the Council's preferred Development Strategy (Option A), as the most sustainable approach and appropriately focusing growth on the district's most accessible settlements—including Hagley. The SA concludes Option A achieves the best performance in terms of sustainability for housing, education and economic benefits.
- Hagley is identified as one of most sustainable settlements and the site is within walking distance of bus routes and railway station.
- The site is contained by development on three sides and performs poorly in Green Belt terms; it also meets the NPPF definition of Grey Belt. The site is relatively unconstrained in terms of heritage assets, flood zone where developable area is proposed, ecology, access strategy, and visual or landscape impacts.
- Support the approach to prepare an IDP and argue that accompanying infrastructure requirements should be viable, evidence-based, and compliant with CIL Reg 122.
- Oppose any requirement for employment development on this allocation as the area is residential in character and the site is not large enough to provide any meaningful contribution to needs.
- HEDNA is outdated as pre-dates standard method changes; new standard method figure for Bromsgrove is minimum starting point and not necessarily the actual housing requirement.

Developers/Landowners:

HAG02 Site Promoters – Key Points

Avison Young obo Taylor Wimpey Strategic Land (Site 174)

- Supports the Council's commitment to deliver significantly higher housing numbers under the revised NPPF, noting the jump from 300 to c.700 homes per year. BDC may need to plan for more than the 9,000 additional homes due to possibility of 3,000 commitments being overly optimistic.
- In addition, contingency should be built in to the local plan by identifying more land for allocation, especially as site capacities in the DDS are untested and likely to fall once site constraints are properly assessed. No housing trajectory is provided therefore a 5YLS cannot be demonstrated. No safeguarded land is identified, contrary to the NPPF.
- Additional housing requirement may be needed to accommodate unmet need from Birmingham.
- Site 174 is a sustainable location within walking distance of local services in the village centre. The site performs relatively poorly in Green Belt terms and should be categorised as Grey Belt. Also challenge the Council's assessment of the site as High-Medium landscape sensitivity rating.
- Evidence provided on heritage impacts of developing the site in relation to Field House listed building to the south of the site.
- Early delivery of the site can contribute to short-term housing land supply and align with the Council's emerging strategy, especially in alignment with sites being promoted to the north of Western Road under proposed allocation HAG01.

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

Developers/Landowners:

Settlement-wide (other Hagley Site Promoters) – Key Points

Pegasus Group obo Riva Land Ltd (Site 123)

- Local plan period should be longer than 2043 as this would be too short to ensure minimum 15 years post-adoption given likely delays.
- The Council's corporate vision is not appropriate for a long-term local plan; the local plan vision should refer to sustainable development, meeting housing and employment needs, cross boundary cooperation and long-term aspirations beyond 2043.
- The employment land requirement for BDC will be significantly higher as existing 28ha figure is insufficient and already a 14.5ha shortfall. HEDNA should be updated as standard method has almost doubled housing need. More employment sites will be needed to support economic growth and avoid continued out-commuting.
- Hagley is identified as a sustainable settlement (the second most sustainable after Bromsgrove town). Mixed use development would complement proposed residential allocations at HAG01 and HAG02.
- Infrastructure requirements should be proportionate and viability tested. They must not be used to solve pre-existing deficits and must meet NPPF tests on planning obligations.

Star Planning obo Richborough (Site 159)

- Local plan should have a dedicated Vision explicitly supporting access to homes, jobs and services. The local plan period should also be until 2044/45 to give full 15 year coverage.
- The standard method for housing need is only a starting point; given evidence of market pressure provided by local indicators such as high house prices and worsening affordability, strong rationale for a need to plan for 20% above the starting point, i.e. c.14,600 homes. This would also provide flexibility in supply.
- It is also unclear whether BDC have factored in unmet need from neighbouring local authorities.
- Broad support for focusing growth at sustainable settlements, but concerns raised over other (BRM01, BRM05, BRM06, ALV01, CA03, HAG02, STP01 and FRA01) proposed allocations in the DDS.
- Support the main settlement focused strategy for growth but disagree with Green Belt release that relies on uncertain proposals such as a new M5 junction, M42 J1 improvements, or a rail station in the Stoke Prior area.
- Green Belt assessment should be updated to reflect new NPPF/PPG.
- HAG02 may need capacity reduced due to noise constraint from A491.

Carter Jonas obo LF (Hagley) Ltd (Site 246)

- The emerging DDS would not be found sound due to very low housing delivery in recent years, a low 5YLS figure of 2.24 years, housing requirement proposed is too low for standard method to 2043, and lack of supply to accommodate wider HMA shortfall and returned Redditch oversupply.
- The current Green Belt assessment for the DDS is outdated and lacks fine grain assessment.
- The DDS distribution strategy directs significant development to less sustainable villages than Hagley, such as Wythall, Catshill, Stoke Prior and Frankley, despite poorer transport access. This fails NPPF para 36(d).
- HAG01 contains Grade 1 and 2 agricultural land, flood zones 2 and 3 with surface water risks as well, intersects nature recovery areas, is further from schools, station and village amenities and conflicts with National Trust plans for a regional park.
- HAG02 is largely Grade 2 agricultural land, has a greater risk of car dependency, heritage sensitivity and landscape impacts, noise concerns, and conflicts with the National Trust plans for a regional park.

Developers/Landowners:

Settlement-wide (other Hagley Site Promoters) – Key Points

- Evidence base updates needed to Green/Grey Belt assessment, HEDNA, 5YLS calculations/inputs, and the Settlement Hierarchy.

Harris Lamb obo Bloor Homes Western (Site 180)

- The Council vision is too aspirational and lacks reference to key national planning objectives. A separate, clearer local plan vision is required aligned with the strategic purposes and NPPF.
- The overall housing requirement in the DDS is too low due to: no uplift applied to standard method for economic aspirations or affordable housing needs; plan period being too short to meet minimum 15 year horizon post adoption; no buffer provided for flexibility with a minimum 10% over allocation suggested to reflect delivery risks.
- Furthermore the plan does not assist with unmet need from Birmingham or Black Country totalling circa 73,000 homes shortfall.
- The plan omits employment land allocations despite the need identified in HEDNA and this likely being now higher.
- Additional land should also be identified for safeguarding to comply with NPPF on long-term permanence of the Green Belt. This should be on all sustainable settlements, not just Bromsgrove town. The Green Belt assessment should also be updated to reflect Grey Belt policy introduced in 2024 and consider fine grain site assessments rather than large parcels.
- Support for HAG01 but argue further allocations required at Hagley.

Conclusion

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

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

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