



Bromsgrove
District Council
www.bromsgrove.gov.uk

Parkside, Market Street,
Bromsgrove, B61 8DA
tel: (01527) 881288



Town Hall, Walter Stranz Square,
Redditch, Worcestershire B98 8AH
tel: (01527) 64252

31st December 2015

Dear Mr Hetherington

RE: Bromsgrove District Council and Redditch Borough Council Examination - Councils additional information

The Councils have provided further information that will be available for consultation until Friday 12th February at 5pm. An outline of each document is provided below.

Narrative of the Site Selection Process

A narrative is being submitted to the Examination entitled 'Narrative on the Site Selection Process for the Growth Areas at Redditch'.

This is the narrative to explain the extensive evidence and the process by which the Councils have evidenced their proposals for the allocations for housing to meet Redditch's housing requirement.

It concentrates on the rationale for the seven 'focussed areas' that were taken forward for further assessment and clearly explains why the evidence suggests that some of these areas contain the best sites for allocation in the two Plans and why some do not.

In your note of the 18th September 2015, you ask for the available evidence to be presented in a manner that demonstrates that all seven areas have been assessed in a comprehensive and co-ordinated way and that the Councils should explain their choice, with reference to the evidence. This has been done.

Updated Heritage Evidence

Updated heritage evidence is being submitted to the Examination entitled 'Hewell Grange Estate: Setting of Heritage Assets Assessment' and 'Lanehouse Farm: Setting of Heritage Assets Assessment' (both dated December 2015).

These detailed assessments consider the potential impact of development on the range of heritage assets associated with both Area 4 (Foxlydiate) and Area 5 (Brockhill West).

These assessments provide a comparable level of analysis which has informed the updated heritage evidence. This analysis has now confirmed the extent to which development should be allowed on the northern boundary of Site 1 – Foxlydiate. It is suggested this extent of development is secured by modifications to the Cross Boundary Policy (RCBD1) / Bromsgrove District Plan Policies Map.

Updated Five Year Housing Land Supply Documents

In response to your Post-Hearings Note of 10th July 2015, both Councils are submitting an updated mid-year (31st October 2015) Five Year Housing Land Supply calculation to the Examination. Your preferred methodology approach of applying the buffer to both the five year requirement and the current delivery shortfall has been adopted. For Bromsgrove, it demonstrates that a Five Year Housing Land Supply is achievable, with a figure of 5.55 years supply. For Redditch, it demonstrates that a Five Year Housing Land Supply is also achievable, with a figure of 5.05 years supply.

Gypsy and Traveller Accommodation Assessment

The additional consultation required for Redditch Borough Council on the Worcestershire Gypsy and Traveller Accommodation Assessment (with reference to your note of 3rd October 2014, paragraphs 20 and 21) will also start on 31st December 2015. Any responses received and the final assessment will be submitted to Redditch's Examination for this purpose.

Other Outstanding Matters

In addition to the above items that will be subject to consultation, the Councils would like to suggest some modifications to the Plan in relation to Housing Standards and Renewable Energy. Details are attached to this letter. This is in response to the reference in your July Post-Hearings Note to two Written Ministerial Statements. The first was dated 25th March 2015 relating to Housing Standards and the second dated 18th June 2015 relating to Renewable Energy. The Councils advised in the July 2015 response that consideration would be given to the implications of these Written Ministerial Statements for any relevant policies in the Plans.

Thank you in advance for your attention to these matters.

Yours sincerely,



Ruth Bamford
Head of Planning and Regeneration
Bromsgrove and Redditch Councils



ATTACHMENT – Proposed Modifications to the Plans

Bromsgrove District Council

Amendments required to the Bromsgrove District Plan are as follows:

Policy/ Paragraph/ table	Existing wording	Proposed wording/ correction	Reason for change
Renewable Energy, paragraph 8.21394	<p>The Renewable Energy Directive 2009 sets a target for the UK to achieve 15% of its energy consumption from renewable sources by 2020. The resource assessment in the Renewable Energy Capacity Study for the West Midlands (2011) reveals considerable potential for renewable energy generation from wind and microgeneration in Bromsgrove. The Worcestershire County Council Renewable Energy Study and the Planning for Renewable Energy in Worcestershire report have identified areas where renewable resources are available/ technically feasible. Compared to big cities, Bromsgrove is identified as having good solar irradiance, showing good opportunities for solar thermal/power generation. The Department of Energy and Climate Change has published a new National Heat Map, identifying locations where heat distribution is most likely to be beneficial and economical. To encourage the deployment of low-carbon electricity and heat generation to households and industrial, business and public sectors, the Government has introduced various schemes, including the Feed-in-Tariffs, Renewable Heat Premium Payments and Renewable Heat Incentive schemes by which householders and businesses will get</p>	<p>The Renewable Energy Directive 2009 sets a target for the UK to achieve 15% of its energy consumption from renewable sources by 2020. The resource assessment in the Renewable Energy Capacity Study for the West Midlands (2011) reveals considerable potential for renewable energy generation from wind and microgeneration in Bromsgrove. The Worcestershire County Council Renewable Energy Study and the Planning for Renewable Energy in Worcestershire report have identified areas where renewable resources are available/ technically feasible. Compared to big cities, Bromsgrove is identified as having good solar irradiance, showing good opportunities for solar thermal/power generation. The Department of Energy and Climate Change has published a new National Heat Map, identifying locations where heat distribution is most likely to be beneficial and economical. To encourage the deployment of low-carbon electricity and heat generation to households and industrial, business and public sectors, the Government has introduced various schemes, including the Feed-in-Tariffs, Renewable Heat Premium Payments and Renewable Heat Incentive schemes by which householders and businesses will get</p>	<p>Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial statement (18th June 2015)</p>

	paid for both the generated energy used on site and any surplus exported energy generated.	paid for both the generated energy used on site and any surplus exported energy generated. <u>For residential development this policy applies to planning applications of more than 10 units.</u>	
Paragraph 8.21 <u>495</u>	To contribute to the carbon reduction target, the Council will support large scale low/ zero carbon energy generation projects when adverse impacts are addressed satisfactorily. For developments in areas where low carbon/ renewable resources/ opportunities are available and technically feasible, the Council will expect the development to incorporate the relevant technologies, such as photovoltaic and district heating network. Where there is a firm plan on the delivery of a renewable/low carbon energy generation schemes, such as wind harvesting/turbines and combined heat and power or tri-generation, developments nearby will be required to connect to these energy supplies.	To contribute to the carbon reduction target, the Council will support large scale low/ zero carbon energy generation projects <u>other than wind energy</u> when adverse impacts are addressed satisfactorily. For developments in areas where low carbon/ renewable resources/ opportunities are available and technically feasible, the Council will expect the development to incorporate the relevant technologies, such as photovoltaic and district heating network. Where there is a firm plan on the delivery of a renewable/low carbon energy generation schemes, such as wind harvesting/turbines and combined heat and power or tri-generation, developments nearby will be required to connect to these energy supplies. <u>Wind energy generation schemes, such as wind harvesting/turbines will be considered against national policy and guidance.</u>	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial statement (18 th June 2015)
BDP22 Climate Change	The Council will deliver viable low carbon climate resilient developments through: a. Encouraging development in existing buildings to achieve consequential energy efficiency improvements b. Requiring allowable solutions to be linked with projects within the District in the first instance, followed by the County and then Region c. Ensuring developments and infrastructure are planned to avoid increased vulnerability to the range of impacts and take advantage of the opportunities arising from climate change, having regard to the intended lifetime of the development. Where developments and	The Council will deliver viable low carbon climate resilient developments through: a. Encouraging development in existing buildings to achieve consequential energy efficiency improvements b. Requiring allowable solutions to be linked with projects within the District in the first instance, followed by the County and then Region c. Ensuring developments and infrastructure are planned to avoid increased vulnerability to the range of impacts and take advantage of the opportunities arising from climate change, having regard to the intended lifetime of the development. Where developments and	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March

	<p>infrastructure are brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, .</p> <p>d. Ensuring developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure.</p> <p>e. Ensuring the construction and design of developments as well as future occupants of the developments will follow the energy, waste management hierarchies and other relevant guidance. Where relevant, developments must comply with the Worcestershire Waste Core Strategy.</p> <p>f. Supporting developments to incorporate zero or low carbon energy generation technologies, especially installations that improve the energy security of developments in the rural areas. Where there is a firm delivery plan of zero or low carbon energy generation scheme, developments nearby are expected to provide infrastructure/ to connect to the zero/ low-carbon energy scheme.</p> <p>g. Supporting zero or low carbon energy generation schemes when adverse impacts are addressed satisfactorily.</p>	<p>infrastructure are brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, .</p> <p>d. Ensuring developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure.</p> <p>e. Ensuring the construction and design of developments as well as future occupants of the developments will follow the energy, waste management hierarchies and other relevant guidance. Where relevant, developments must comply with the Worcestershire Waste Core Strategy.</p> <p>f. Supporting developments to incorporate zero or low carbon energy generation technologies, especially installations that improve the energy security of developments in the rural areas. Where there is a firm delivery plan of zero or low carbon energy generation scheme, developments nearby are expected to provide infrastructure/ to connect to the zero/ low-carbon energy scheme.</p> <p>g. Supporting zero or low carbon energy generation schemes <u>other than wind energy</u> when adverse impacts are addressed satisfactorily.</p>	2015)
Policy BPD 8	<p>BDP8.1 Where there is a net increase of 10 or more dwellings or the site is equal to or greater than 0.4 hectares, affordable housing provision will be expected on-site and will be calculated against the net number of new dwellings as follows: Up to 40% affordable housing on greenfield sites or any site accommodating 200 or more dwellings; Up to 30% affordable housing on brownfield sites accommodating less than 200 dwellings BDP8.2 In exceptional circumstances where the</p>	<p>BDP8.1 Where there is a net increase of 10 or more dwellings or the site is equal to or greater than 0.4 hectares, affordable housing provision will be expected on-site and will be calculated against the net number of new dwellings as follows: Up to 40% affordable housing on greenfield sites or any site accommodating 200 or more dwellings; Up to 30% affordable housing on brownfield sites accommodating less than 200 dwellings BDP8.2 In exceptional circumstances where the</p>	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written

	<p>applicant can fully demonstrate that the required target cannot be achieved the Council may negotiate a lower provision.</p> <p>BDP8.3 The Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking into account local needs, the housing mix in the local area and the impact on viability. A mix of the following tenures will generally be sought: Social rented; Intermediate housing; and Affordable rent</p> <p>BDP8.4 The affordable housing element of developments should focus primarily on the delivery of smaller units. However, there may be locations or changes in market conditions that warrant a different breakdown to deliver a scheme that best meets local needs in relation to the relevant settlement. The precise mix to be provided should be developed through discussions with the Strategic Housing Team.</p> <p>BDP8.5 To help meet the needs of the elderly all homes should be built to Lifetime Homes Standards in accordance with BDP10 Homes for the Elderly.</p> <p>BDP8.6 To create mixed and balanced communities affordable housing should be distributed throughout new developments and not be visually distinguishable from market housing.</p> <p>BDP8.7 When a development site is brought forward for planning consent on a piecemeal basis i.e. involving a parcel of land for development which is part of a larger site, Bromsgrove District Council will assess 'affordable housing' targets for each part of the site on a pro-rata basis having regard to the overall requirements generated by the whole site.</p>	<p>applicant can fully demonstrate that the required target cannot be achieved the Council may negotiate a lower provision.</p> <p>BDP8.3 The Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking into account local needs, the housing mix in the local area and the impact on viability. A mix of the following tenures will generally be sought: Social rented; Intermediate housing; and Affordable rent</p> <p>BDP8.4 The affordable housing element of developments should focus primarily on the delivery of smaller units. However, there may be locations or changes in market conditions that warrant a different breakdown to deliver a scheme that best meets local needs in relation to the relevant settlement. The precise mix to be provided should be developed through discussions with the Strategic Housing Team.</p> <p>BDP8.5 To help meet the needs of the elderly all homes should be built to Lifetime Homes Standards <u>new technical standards</u> in accordance with BDP10 Homes for the Elderly.</p> <p>BDP8.6 To create mixed and balanced communities affordable housing should be distributed throughout new developments and not be visually distinguishable from market housing.</p> <p>BDP8.7 When a development site is brought forward for planning consent on a piecemeal basis i.e. involving a parcel of land for development which is part of a larger site, Bromsgrove District Council will assess 'affordable housing' targets for each part of the site on a pro-rata basis having regard to the overall requirements generated by the whole site.</p>	<p>Ministerial Statement (25th March 2015)</p>
BDP19	The Council will deliver high quality people focused	The Council will deliver high quality people focused	Changes in

<p>High Quality Design</p>	<p>space through:</p> <ul style="list-style-type: none"> a. Requiring developments to use appropriate tools and follow relevant guidance and procedure to achieve good design; b. Preparing a Design Guide Supplementary Planning Document; c. Ensuring residential development achieve the highest standard of Building for Life; d. Ensuring all affordable housing to meet the Code for Sustainable Home Level 6 and all market housing to meet Code Level 4 now and Code Level 6 by 2016; e. Ensuring all non-residential developments to meet BREEAM 'very good' standard; f. Ensuring development to enhance the character and distinctiveness of the local area; g. Supporting all major developments that help facilitate interactions between future occupants; h. Promoting developments to include new Public Art; i. Creating and enhancing gateway locations and key approach corridors as well as protecting and enhancing important local and longer-distance visual corridors; j. Ensuring developments are accessible to all users; k. Ensuring permeable, safe and easy to navigate streets layout; l. Avoiding road-dominated layout by supporting the design of street to follow the user hierarchy: 1) pedestrian; 2) cyclists; 3) public transport users; 4) specialist service vehicles (e.g. emergency services, waste, etc.); 5) other motor traffic; m. Requiring residential developments to provide sufficient functional space for everyday activities, meet people's needs and expectations from their homes, and to enable flexibility and adaptability through meeting the internal environment standards in Standards and Quality 	<p>space through:</p> <ul style="list-style-type: none"> a. Requiring developments to use appropriate tools and follow relevant guidance and procedure to achieve good design; b. Preparing a Design Guide Supplementary Planning Document; c. Ensuring <u>Encouraging</u> residential development achieve the highest standard of Building for Life; d. Ensuring all affordable housing to meet the Code for Sustainable Home Level 6 and all market housing to meet Code Level 4 now and Code Level 6 by 2016; e. Ensuring all non-residential developments to meet BREEAM 'very good' standard; f. Ensuring development to enhance the character and distinctiveness of the local area; g. Supporting all major developments that help facilitate interactions between future occupants; h. Promoting developments to include new Public Art; i. Creating and enhancing gateway locations and key approach corridors as well as protecting and enhancing important local and longer-distance visual corridors; j. Ensuring developments are accessible to all users; k. Ensuring permeable, safe and easy to navigate streets layout; l. Avoiding road-dominated layout by supporting the design of street to follow the user hierarchy: 1) pedestrian; 2) cyclists; 3) public transport users; 4) specialist service vehicles (e.g. emergency services, waste, etc.); 5) other motor traffic; m. Requiring residential developments to provide sufficient functional space for everyday activities, meet people's needs and expectations from their homes, and to enable flexibility and adaptability through meeting the internal environment standards in Standards and Quality 	<p>response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)</p>
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	<p>in Development: A good practice guide;</p> <p>n. Development of garden land will be resisted unless it fully integrates into the residential area, is in keeping with the character and quality of the local environment;</p> <p>o. Ensuring developments meet the 'Secured by Design' standard;</p> <p>p. Ensuring all trees that are appropriate (e.g. in terms of size, species, conditions and predicted climate) be retained and integrated within new development;</p> <p>q. Ensuring development incorporates sufficient, appropriate soft landscaping and measures to reduce the potential impact of pollution (air, noise, vibration, light, water) to occupants, wildlife and the environment;</p> <p>r. Ensuring development is made suitable for the proposed final use, for instance, in terms of land contamination. The Council will determine whether reports detailing for example, site history; an appropriate remediation scheme; long term monitoring and maintenance proposals, will need to be submitted in support of any planning application. Such reports will be prepared in accordance with best practice guidance.</p> <p>s. In relation to air quality all new developments with a floor space greater than 1000sqm or 0.5 hectare or residential developments of 10 or more units must not increase nitrogen dioxide (NO2), particulate matter (PM10) and carbon dioxide (CO2) emissions from transport and should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance.</p> <p>i. All planning applications meeting the above criteria should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance. The applicant will also take into account the cumulative impacts of validated developments in the local area.</p>	<p>in Development: A good practice guide;</p> <p>n. Development of garden land will be resisted unless it fully integrates into the residential area, is in keeping with the character and quality of the local environment;</p> <p>o. Ensuring developments meet the 'Secured by Design' standard;</p> <p>p. Ensuring all trees that are appropriate (e.g. in terms of size, species, conditions and predicted climate) be retained and integrated within new development;</p> <p>q. Ensuring development incorporates sufficient, appropriate soft landscaping and measures to reduce the potential impact of pollution (air, noise, vibration, light, water) to occupants, wildlife and the environment;</p> <p>r. Ensuring development is made suitable for the proposed final use, for instance, in terms of land contamination. The Council will determine whether reports detailing for example, site history; an appropriate remediation scheme; long term monitoring and maintenance proposals, will need to be submitted in support of any planning application. Such reports will be prepared in accordance with best practice guidance.</p> <p>s. In relation to air quality all new developments with a floor space greater than 1000sqm or 0.5 hectare or residential developments of 10 or more units must not increase nitrogen dioxide (NO2), particulate matter (PM10) and carbon dioxide (CO2) emissions from transport and should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance.</p> <p>i. All planning applications meeting the above criteria should be accompanied by an assessment of the likely impact of the development on local air quality and comply with current best practice guidance. The applicant will also take into account the cumulative impacts of validated developments in the local area.</p>	
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	<p>Additionally, the assessment should consider the impact of local air quality on the proposed development.</p> <p>ii. Development with the potential to result in significant impact on air quality, either cumulatively or individually will be resisted unless appropriate measures to mitigate the impact of air pollutants are included. Development will be expected to contribute to the provision of adequate mitigation measures in accordance with BDP6.</p> <p>t. Development proposals should maximise the distance between noise sources (for example motorways) and noise sensitive uses (such as residential), whilst also taking into account the implications of the existing night time use of the locality.</p> <p>u. Ensuring a feasible and viable management plan is available for all the facilities and provisions arising from the development;</p> <p>v. Ensuring development make the best use of land in accordance with BDP7 Housing Mix and Density</p> <p>BDP 19.2 For large scale developments, developers will need to prepare Design Codes for the area, which would then serve to inform all developments in that area as they come forward.</p>	<p>Additionally, the assessment should consider the impact of local air quality on the proposed development.</p> <p>ii. Development with the potential to result in significant impact on air quality, either cumulatively or individually will be resisted unless appropriate measures to mitigate the impact of air pollutants are included. Development will be expected to contribute to the provision of adequate mitigation measures in accordance with BDP6.</p> <p>t. Development proposals should maximise the distance between noise sources (for example motorways) and noise sensitive uses (such as residential), whilst also taking into account the implications of the existing night time use of the locality.</p> <p>u. Ensuring a feasible and viable management plan is available for all the facilities and provisions arising from the development;</p> <p>v. Ensuring development make the best use of land in accordance with BDP7 Housing Mix and Density</p> <p>BDP 19.2 For large scale developments, developers will need to prepare Design Codes for the area, which would then serve to inform all developments in that area as they come forward.</p>	
Paragraph 8.125	<p>Lifetime Homes Standards are inexpensive, simple features designed to make homes more flexible and functional for all. In order to progressively encourage increased take-up in new build projects, Lifetime Homes Standards are a key feature within the Code for Sustainable Homes and currently mandatory at level 6.</p>	<p>Lifetime Homes Standards are inexpensive, simple features designed to make homes more flexible and functional for all. In order to progressively encourage increased take-up in new build projects, Lifetime Homes Standards are a key feature within the Code for Sustainable Homes and currently mandatory at level 6.</p>	<p>Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial</p>

			Statement (25th March 2015)
Paragraph 8.126	The Joseph Rowntree Foundation in association with the Habinteg Housing Association (lifetimehomes.org.uk) conducted a national comparative study into the cost of meeting both Building Regulations and Lifetime Home standards. The additional cost of building Lifetime Homes ranged from £545 to a maximum of only £1615 per dwelling, depending on the size, layout and specification of the property.	The Joseph Rowntree Foundation in association with the Habinteg Housing Association (lifetimehomes.org.uk) conducted a national comparative study into the cost of meeting both Building Regulations and Lifetime Home standards. The additional cost of building Lifetime Homes ranged from £545 to a maximum of only £1615 per dwelling, depending on the size, layout and specification of the property.	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)
Paragraph 8.258	It is well understood that most development damages the natural environment and it is important that the resulting damage to the environment can be minimised. The Code for Sustainable Homes and BREEAM are the widely adopted tools for rating and measuring the sustainability performance of domestic and non-domestic buildings. In Bromsgrove, it is tested viable in the Affordable Housing Viability Study to require affordable housing development to meet the Code for Sustainable Homes Level 6, and market housing to meet Code Level 4 now, and to meet Level 6 by 2016. For non-residential development, the Council expects development to meet the BREEAM 'very good' standard.	It is well understood that most development damages the natural environment and it is important that the resulting damage to the environment can be minimised. The Code for Sustainable Homes and BREEAM <u>is</u> are the widely adopted tools for rating and measuring the sustainability performance of domestic and non-domestic buildings. In Bromsgrove, it is tested viable in the Affordable Housing Viability Study to require affordable housing development to meet the Code for Sustainable Homes Level 6, and market housing to meet Code Level 4 now, and to meet Level 6 by 2016. For non-residential development, the The Council expects <u>non-domestic</u> development to meet the BREEAM 'very good' standard.	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)
Paragraph 8.127	There was considerable support for this policy during the consultation as it demonstrated that the Council recognised the need to understand and plan for an	There was considerable support for this policy during the consultation as it demonstrated that the Council recognised the need to understand and plan for an	Changes in response to July Post

	<p>ageing population. There were some concerns about the introduction of 'Lifetime Homes' standards from developers; however, these measures are seen as essential to meet the needs of the elderly and assisting independent living at home. 'Lifetime Homes' standards were taken into account as part of the Affordable Housing Viability Study (2012). There was also a desire from developers to provide elderly accommodation outside defined settlements; however, this would contradict policy BDP 4 Green Belt.</p>	<p>ageing population. There were some concerns about the introduction of 'Lifetime Homes' standards from developers; however, these measures <u>have been replaced by new technical standards and requirements.</u> are seen as essential to meet the needs of the elderly and assisting independent living at home. 'Lifetime Homes' standards were taken into account as part of the Affordable Housing Viability Study (2012). There was also a desire from developers to provide elderly accommodation outside defined settlements; however, this would contradict policy BDP 4 Green Belt.</p>	<p>Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)</p>
<p>Policy BDP 10</p>	<p>BDP10.1 Bromsgrove District Council will encourage the provision of housing for the elderly and for people with special needs, where appropriate whilst avoiding an undue concentration in any location. BDP10.2 The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standards, so that they can be readily adapted to meet the needs of those with disabilities and the elderly, as well as assisting independent living at home. BDP10.3 The Council will, through the identification of sites and/or granting of planning consents in sustainable locations, provide for the development of residential care homes, close care, 'extra care' and assisted care housing; and in particular Continuing Care Retirement Communities which encompass an integrated range of such provision. Sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements. Where such sites are not available regard will be paid to the potential for development to be self-contained to reduce travel requirements and the availability and accessibility of</p>	<p>BDP10.1 Bromsgrove District Council will encourage the provision of housing for the elderly and for people with special needs, where appropriate whilst avoiding an undue concentration in any location. BDP10.2 The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standards, so that they can be readily adapted to meet the needs of those with disabilities and the elderly, as well as assisting independent living at home. BDP10.3 The Council will, through the identification of sites and/or granting of planning consents in sustainable locations, provide for the development of residential care homes, close care, 'extra care' and assisted care housing; and in particular Continuing Care Retirement Communities which encompass an integrated range of such provision. Sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements. Where such sites are not available regard will be paid to the potential for development to be self-contained to reduce travel requirements and the availability and accessibility of</p>	

	public transport.	public transport.	
Paragraph 8.291	In Bromsgrove, the viability of meeting the Code for Sustainable Homes standard was tested in the Affordable Housing Viability Study. The study found that it is viable for affordable housing development to meet the Code Level 6 by 2013 and for market housing, it is viable to meet Code Level 4 by 2013 and Code Level 6 by 2016.	In Bromsgrove, the viability of meeting the Code for Sustainable Homes standard was tested in the Affordable Housing Viability Study. The study found that it is viable for affordable housing development to meet the Code Level 6 by 2013 and for market housing, it is viable to meet Code Level 4 by 2013 and Code Level 6 by 2016.	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)
Paragraph 8.300	There were criticisms on demanding market housing to achieve the same level of Code for Sustainable Homes as affordable housing and requiring developments to provide infrastructure to connect to nearby zero/low energy scheme with firm delivery plan. Some also considered the policy repeating the national policy as there was no evidence to demonstrate local circumstances. The Affordable Housing Viability Assessment was published since DCS2 which provide evidence for requiring market housing to achieve the Code for Sustainable Homes. As developments have to provide general services, there is no reason why connecting to zero/ low-carbon scheme will affect the viability of the development.	There were criticisms on demanding market housing to achieve the same level of Code for Sustainable Homes as affordable housing and requiring developments to provide infrastructure to connect to nearby zero/low energy scheme with firm delivery plan. Some also considered the policy repeating the national policy as there was no evidence to demonstrate local circumstances. The Affordable Housing Viability Assessment was published since DCS2 which provide evidence for requiring market housing to achieve the Code for Sustainable Homes. As developments have to provide general services, there is no reason why connecting to zero/ low-carbon scheme will affect the viability of the development. <u>The Written Ministerial Statement on 25th March abolished the Code for Sustainable Homes. Therefore the requirement for developments to meet the Code for Sustainable Homes has been removed, although development must meet the new technical standards.</u>	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)
Paragraph	In terms of residential development, the Environment	In terms of residential development, the Environment	Changes in

8.306	Agency Report states that getting existing homes retrofitted could reduce/ delay the need for new resource developments. It is tested in the Affordable Housing Viability Assessment that all market housing in the District can achieve Level 454 of the Code for Sustainable Homes by 2013 and Level 655 by 2016 and that affordable housing can achieve Code Level 6 from 2013 onwards.	Agency Report states that getting existing homes retrofitted could reduce/ delay the need for new resource developments. It is tested in the Affordable Housing Viability Assessment that all market housing in the District can achieve Level 454 of the Code for Sustainable Homes by 2013 and Level 655 by 2016 and that affordable housing can achieve Code Level 6 from 2013 onwards. <u>All developments will need to meet the new technical standards.</u>	response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)
Paragraph 8.318	Some considered water efficiency is already addressed in Building Regulations and questioned the viability of achieving the water standard in the Code for Sustainable Homes and BREEAM. The Affordable Housing Viability Assessment was published since the last consultation which provides evidence for the required standard in the Code for Sustainable Homes.	Some considered water efficiency is already addressed in Building Regulations and questioned the viability of achieving the water standard in the Code for Sustainable Homes and BREEAM. The Affordable Housing Viability Assessment was published since the last consultation which provides evidence for the required standard in the Code for Sustainable Homes.	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)
Policy BDC 23	The Council will deliver safe developments with low environmental impact through: a) Supporting developments that take into account of the Severn River Basin Management Plan and contribute to delivering the Water Framework Directive objectives. b) Supporting developments that follow the water conservation hierarchy. All market housing developments should achieve at least the water	The Council will deliver safe developments with low environmental impact through: a) Supporting developments that take into account of the Severn River Basin Management Plan and contribute to delivering the Water Framework Directive objectives. b) Supporting developments that follow the water conservation hierarchy. All market housing developments should achieve at least the water	Changes in response to July Post Hearing Note suggestion by the Inspector to check

	<p>category of the Code for Sustainable Homes Level 4 by 2013 and Level 6 after 2016. Affordable housing should at least achieve the water category of Code Level 6 from 2013 onwards. Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development.</p> <p>c) Ensuring development addresses flood risk from all sources, follow the flood risk management hierarchy when planning and designing development, and do not increase the risk of flooding elsewhere. Where inappropriate developments in areas at risk of flooding are necessary after the sequential test is applied, appropriate designs, materials and escape routes that minimise the risk(s) and loss should be incorporated.</p> <p>d) Requiring all developments to work with the Lead Local Flood Authority and SuDS Approval Body and pay necessary regard to the Local Flood Risk Management Strategy and its evidence.</p> <p>e) Requiring all major developments to engage with Severn Trent Water at the earliest opportunity to ensure that sufficient capacity of the sewerage system (i.e. wastewater collection and treatment) is available to accommodate the development.</p> <p>f) Supporting developments that protect and enhance water quality. This includes ensuring the phasing of development is in line with the completion of the required infrastructure and non-mains drainage will follow the foul drainage hierarchy with appropriate management plans in place.</p> <p>g) Requiring developments to set aside land for Sustainable Drainage Systems (SuDS) and follow the SuDS management train concept. This includes maximising opportunities for restoring watercourses,</p>	<p>category of the Code for Sustainable Homes Level 4 by 2013 and Level 6 after 2016. Affordable housing should at least achieve the water category of Code Level 6 from 2013 onwards. Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development. <u>New residential developments should meet new technical standards.</u></p> <p>c) Ensuring development addresses flood risk from all sources, follow the flood risk management hierarchy when planning and designing development, and do not increase the risk of flooding elsewhere. Where inappropriate developments in areas at risk of flooding are necessary after the sequential test is applied, appropriate designs, materials and escape routes that minimise the risk(s) and loss should be incorporated.</p> <p>d) Requiring all developments to work with the Lead Local Flood Authority and SuDS Approval Body and pay necessary regard to the Local Flood Risk Management Strategy and its evidence.</p> <p>e) Requiring all major developments to engage with Severn Trent Water at the earliest opportunity to ensure that sufficient capacity of the sewerage system (i.e. wastewater collection and treatment) is available to accommodate the development.</p> <p>f) Supporting developments that protect and enhance water quality. This includes ensuring the phasing of development is in line with the completion of the required infrastructure and non-mains drainage will follow the foul drainage hierarchy with appropriate management plans in place.</p> <p>g) Requiring developments to set aside land for Sustainable Drainage Systems (SuDS) and follow the SuDS management train concept. This includes</p>	<p>compliance with Written Ministerial Statement (25th March 2015)</p>
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	deculverting, delivering multiple benefits in line with BDC24 Green Infrastructure and ensuring that an appropriate buffer zone is provided between the watercourse and any development.	maximising opportunities for restoring watercourses, deculverting, delivering multiple benefits in line with BDC24 Green Infrastructure and ensuring that an appropriate buffer zone is provided between the watercourse and any development.	
Monitoring Indicators BDP19	Proportion of relevant schemes incorporating “secured by design” High Quality Design principles % of people to which fear of crime is an issue Number of recorded crimes Number of ASBO’s % of non-residential developments to meet BREEAM ‘very good’ standard % of affordable housing to meet the Code for Sustainable Home Level 6 The level of the Code for Sustainable Homes achieved by market (% achieved for each code level) No. of schemes achieving Building for Life diamond status Decrease in CO2 emissions Number of new AQMA’s declared	Proportion of relevant schemes incorporating “secured by design” High Quality Design principles % of people to which fear of crime is an issue Number of recorded crimes Number of ASBO’s % of non-residential developments to meet BREEAM ‘very good’ standard % of affordable housing to meet the Code for Sustainable Home Level 6 The level of the Code for Sustainable Homes achieved by market (% achieved for each code level) No. of schemes achieving Building for Life diamond status Decrease in CO2 emissions Number of new AQMA’s declared	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25th March 2015)

Redditch Borough Council

Amendments are required to the Borough of Redditch Local Plan No.4 as follows:

Policy/ paragraph/ table/ map reference in Proposed Submission version of BORLP4	Existing wording	Proposed wording/ correction	Reason for change
Policy 4 Housing Provision, paragraph 4.5	In order to achieve a supply of flexible and inclusive housing in the Borough that	In order to achieve a supply of flexible and inclusive housing in the Borough that caters for	Changes in response to July

	caters for life-long occupancy, all new affordable housing for rent will be expected to comply with the Lifetime Homes Standard. The private sector development industry will be encouraged to implement the concept of lifetime homes within their development schemes	life-long occupancy, all new affordable housing for rent will be expected to comply with the Lifetime Homes Standard <u>new technical standards</u> . The private sector development industry will be encouraged to implement the concept of lifetime homes <u>new technical standards</u> within their development schemes	Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25 th March 2015)
Policy 15, new paragraph in policy as paragraph 15.5		<u>15.5 This policy relates to all forms of renewable energy development other than wind energy developments. Wind energy development will be considered against national policy and guidance</u>	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (18 th June 2015)
Policy 15, paragraph 15.2	15.2 To be sustainable, new developments must have regard for the need to be climate-resilient. In order to ensure appropriate consideration of adaptation and mitigation to climate change has been made, applications will be judged against the following criteria	15.2 To be sustainable, new developments must have regard for the need to be climate-resilient. <u>For residential development this policy applies to planning applications of more than 10 units.</u> In order to ensure appropriate consideration of adaptation and mitigation to climate change has been made, applications will be judged against the following criteria	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25 th March 2015)
	iii. proposals must seek to be zero carbon in line with Government targets;	iii. proposals must seek to be zero carbon in line with Government targets; <u>meet the new national technical standards</u>	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25 th March 2015)

	iv. all new residential development must meet the nationally required standard of the Code for Sustainable Homes (or any other national scheme which supersedes it);	iv. all new residential development must meet the nationally required standard of the Code for Sustainable Homes (or any other national scheme which supersedes it);	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25 th March 2015)
	15.7 The Government's target is that buildings should meet zero-carbon standards by 2016. The Code for Sustainable Homes is intended to improve the overall sustainability of new homes and measures the sustainability of a home against design categories. BREEAM (BRE Environmental Assessment Method) is a widely used environmental assessment method for non-domestic buildings. It sets the standard for best practice in sustainable design and is used as a measure to describe a buildings environmental performance http://www.breeam.org/index.jsp . All developers will be encouraged to meet the highest level of Code for Sustainable Homes/BREEAM rating (or any other national scheme which supersedes them) as is economically viable but are not required to meet standards above those set nationally.	15.7 The Government's target is that buildings should meet zero-carbon standards by 2016. The Code for Sustainable Homes is intended to improve the overall sustainability of new homes and measures the sustainability of a home against design categories. BREEAM (BRE Environmental Assessment Method) is a widely used environmental assessment method for non-domestic buildings. It sets the standard for best practice in sustainable design and is used as a measure to describe a buildings environmental performance http://www.breeam.org/index.jsp. All non-domestic developments will be encouraged to meet the highest level of Code for Sustainable Homes/BREEAM rating (or any other national scheme which supersedes them) as <u>where it</u> is economically viable but are not required to meet standards above those set nationally.	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25 th March 2015)
Appendix 8: Glossary and Abbreviations	Code for Sustainable Homes (CSH / CFSH) The Government's standard designed to improve the overall	Code for Sustainable Homes (CSH / CFSH) The Government's standard designed to improve the overall	Changes in response to July Post Hearing Note

	sustainability of new homes by setting a single framework.	sustainability of new homes by setting a single framework.	suggestion by the Inspector to check compliance with Written Ministerial Statement (25 th March 2015)
Policy 18, Reasoned Justification, paragraph 18.10	18.10 Through the use of SuDS techniques and the requirement for new developments to be assessed against either the Code for Sustainable Homes or BREEAM, water demand will be significantly lowered. The Level 2 SFRA contains more guidance on the appropriate application of SuDS.	18.10 Through the use of SuDS techniques and the requirement for new developments to be assessed against either the Code for Sustainable Homes the new national technical standards or BREEAM, water demand will be significantly lowered. The Level 2 SFRA contains more guidance on the appropriate application of SuDS.	Changes in response to July Post Hearing Note suggestion by the Inspector to check compliance with Written Ministerial Statement (25 th March 2015)