

Bromsgrove District Council



# Sustainability Appraisal of the Local Development Documents Appraisal of Issues and Options Paper

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Interim Report

June 2005

Report no: 0002-NHR-NH50883-01



Bromsgrove District Council

# Sustainability Appraisal of the Local Development Documents

## Appraisal of Issues and Options Paper

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Interim Report

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**Report no:** 0002-NHR-NH50883-01

**Date:** June 2005

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# 1 Introduction

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Bromsgrove District Council (DC) commissioned Hyder Consulting (UK) Limited (Hyder) in May 2005 to carry out a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) on the Issues and Options<sup>i</sup> paper for their emerging Local Development Framework (LDF). The Issues and Options refer specifically to the Core Strategy and not to detailed site allocations or development proposals.

Bromsgrove DC published an SA Scoping Report<sup>ii</sup> for the LDF for consultation in May 2005. Hyder Consulting carried out a review of the Scoping Report as part of the initial SA/SEA process<sup>iii</sup> and made recommendations where appropriate on Stage A of the SA/SEA process as guided by the Office of the Deputy Prime Minister (ODPM) publications.

This report documents the SA/SEA of the Issues and Options paper for Bromsgrove DC's emerging LDF. The structure of this report broadly follows that outlined in the ODPM's, '*The Strategic Environmental Assessment Directive: Guidance for Planning Authorities*<sup>iv</sup>' and the Consultation Paper on the *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks*.<sup>v</sup>

## 1.1 Legislation

### 1.1.1 Planning and Compulsory Purchase Act 2004

The Planning and Compulsory Purchase Act 2004 outlines a new planning framework consisting of Development Frameworks and their constituent Development Documents. The Act requires that SA be carried out on such Plans. The requirements of a SA include SEA in accordance with the SEA Directive and the *Environmental Assessment of Plans and Programmes Regulations 2004*.<sup>vi</sup>

### 1.1.2 Directive 2001/42/EC

The Strategic Environmental Assessment Directive 2001/42/EC ("on the assessment of the effects of certain plans and programmes on the environment", referred to as the SEA Directive)<sup>vii</sup>, as implemented in the UK on 21 July 2004 requires that certain Plans and Programmes be assessed for their effects on the environment.

## 1.2 SA/SEA Approach

The purpose of SA/SEA is to promote sustainable development through better integration of sustainability considerations into the preparation and implementation of plans. SA/SEA identifies and reports on the likely significant effects of the plan and the extent to which implementation of the

plan would achieve the social, environmental and economic objectives by which sustainable development can be defined.

Guidance issued from the ODPM on SEA for Spatial Plans recommends that SEA and SA be integrated into the same process. The SA/SEA for Bromsgrove DC's LDF has adhered to this guidance and the prevailing legislation.

The Bromsgrove DC Scoping Report, as amended following consultation and verification, sets out the framework for the SA/SEA. The SA/SEA of the Issues and Options has followed this framework. SA/SEA is an iterative process and this report will be used to inform the decision on the preferred options for the Core Strategy.

## 2 Sustainability & Environmental Baseline, Problems, Opportunities and Objectives

### 2.1 Introduction

Bromsgrove DC carried out a Scoping study for their emerging LDF in April 2005. This study set out the sustainability framework, including objectives and targets for the LDF, assessed the current environmental conditions, reported sustainability problems and opportunities and placed the emerging plan into context with other policies, plans and programmes.

The following sections describe these issues in brief. More information can be found in the Scoping Report and the Scoping Report Verification carried out by Hyder Consulting.

### 2.2 SA/SEA objectives and Indicators

The SA/SEA objectives, as derived by Bromsgrove DC, are shown in table 2.1. This table indicates if the objective relates to economic, social and environmental sectors. These objectives (abbreviated in the assessment tables) were used to assess the proposed Issues and Options for the emerging LDF.

SA Objective	econ	soc	env
The provision of housing to meet housing needs		✓	
An improvement in the health and well-being of the population		✓	
A reduction in poverty and social exclusion		✓	
Quality education opportunities for all		✓	
Reduce and prevent crime and fear of crime		✓	
Vibrant and locally distinctive communities		✓	
Accessible services and opportunities for culture, leisure and recreation for all		✓	
Reduce the need to travel by car and increase travel choice and accessibility through integrated transport facilities		✓	
Reduction in ambient noise levels and incidences of noise pollution			✓
Conserve and enhance the District's biodiversity			✓
Protect the countryside, green spaces, green belt and best agricultural land			✓

SA Objective	econ	soc	env
Preserve and enhance the district's high quality landscapes			✓
Protect and enhance the qualities of the historic environment			✓
Address the waste hierarchy (reduce, reuse, recycle)			✓
Protect and enhance water quality and maintain sustainable water resource			✓
Reduce number of properties at risk from flooding			✓
Guard against land contamination and encourage remediation of contaminated sites			✓
Optimum use of previously developed land to support regeneration			✓
Increased energy efficiency and a reduction in greenhouse gas emissions			✓
Improved air quality throughout the District			✓
High and stable levels of employment	✓		
Sustainable economic growth and a diverse economy	✓		
Development of a skilled workforce to meet the needs of business	✓		
Sustainable use and development of material assets	✓		

**Table 2-1 SA/SEA Objectives**

## 2.3 Environmental and Sustainability Baseline

The assessment of significant environmental effects during the SA and SEA process needs to consider the state of the existing environment.

A full description of the environmental and sustainability baseline can be found in the Scoping Report. A summary is provided in Appendix A.

## 2.4 Links to other Policies, Plans, and Programmes

The identification of relevant policies, plans and programmes was undertaken by Bromsgrove DC in the Scoping Report.



## 2.5 Key Environmental and Sustainability Issues

A number of Environmental and Sustainability Issues were identified from the baseline study and the assessment of other plans and strategies. These are detailed below together with a brief summary of the issue:

- **Rising older population**

Bromsgrove has an above average retired population. This impacts on service provision, housing needs and workforce availability.

- **Barriers to housing and services in rural areas**

The District has many small settlements without their own services. High house prices have resulted from inward migration. Many local facilities and transport options are considered unviable due to the dispersed population.

- **Large identified greenfield sites for future development needs**

The District contains a number of large Areas of Development Restraint (ADRs) sites that were formerly Green Belt. They are all greenfield sites and some contain diverse habitats. The designations can act as a blight on an area. It is necessary to balance the perceived development needs of District against actual need and loss of greenfield land.

- **Housing to meet local needs**

The new RSS requires that the District normally only provides housing for 'local needs'. This could have a positive effect on migration and reduce travelling and increase the affordability of housing.

- **Reducing fear of crime**

Bromsgrove is a low crime area but fear of crime is high. High fear of crime leads to increased use of 'safe' private transport and the avoidance of sustainable means of transport such as walking, cycling and public transport.

- **Under-provision of affordable housing**

There is a lack of affordable housing for local people which leads to social exclusion and harm to community life and networks.

- **Implications of redeveloping brownfield sites**

High density development within existing settlements can lead to a negative impact on local environments. Over 90% of the land in Bromsgrove is designated as Green Belt and there are few large available brownfield sites. Nonetheless, the MG Rover plant at Longbridge, immediately to the north of the district, now classes as a major brownfield site.

- **School rebuilding and resiting programme**

Environmental impacts can be incurred through using Green Belt and greenfield land for new schools. Opportunities exist to increase sustainability of school buildings. Changes in traffic patterns can also result from resiting of schools and must be considered.

- **High car usage and congestion**

Bromsgrove has a high incidence of car usage compared to public transport, cycling and walking leading to congested roads at peak periods.

- **Commuting out of District**

Commuting out to work not only has an impact on the pool of labour for businesses in the District but also house prices and high incidences of car usage throughout the District.

- **Local facilities to meet the needs of the population**

High housing development rates lead to an imbalance in service provision to population size.

- **Air quality**

Poorer air quality, in parts due to high car usage, and major motorways passing through District.

- **Changing economy**

The District is undergoing a change in its economy from heavy industry to high tech industries.

- **Degradation of the Natural and Built Environment**

Degradation of the natural environment as a whole has been realised incrementally over time as a result of damaging land use practices. Specific concerns relate to conservation of biodiversity and cultural heritage and the protection of groundwater supplies.

## 3 Issues and Alternative Options

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### 3.1 Introduction

From the assessment of baseline environmental and sustainability issues undertaken in the Scoping Report, Bromsgrove DC have developed a series of key issues and options for their Core Strategy. This section of the report presents each issue and option as identified in the Issues and Options Paper. For full details of the origins of the options, including information on the national, regional and local context, refer to the Issues and Options Paper directly.

### 3.2 Key Issues and Options

Section 3.2.1 of this report details the issues and options addressed in the Issues and Options Paper. They have been directly reproduced from the Issues and Options Paper and include an introduction to the background of the issues. In summary, the following key, strategic planning considerations have been identified:

- The role of Bromsgrove in the region in relation to housing, economic growth, employment land, retail and shopping, tourism and sports, recreation.
- Development in greenbelt (and ADR) versus brownfield sites.
- Development restraint versus local needs.
- Focus development in rural or urban areas.
- Development of major brownfield sites such as the former MG Rover plant at Longbridge.
- Reducing the dependence upon the private car.
- How to approach the issue of affordable housing provision in light of the current housing moratorium.

#### 3.2.1 Key Issue 1: Location of Growth

##### Background to Issue

One of the key roles of the planning system is to ensure that future growth in the District occurs in the most sustainable locations. Over 90% of the land in Bromsgrove is designated as Green Belt and there are few large available brownfield sites. Consequently, the Local Plan had to remove land from the Green Belt to accommodate future growth. However, since the Local Plan was adopted, the Regional Spatial Strategy has defined Bromsgrove as a rural area that should generally only provide for local needs and not for migration from the nearby urban areas like Birmingham.

## Sub-Issues and Options

### Issue 1 – Location for growth

When new housing or employment is needed where should it go?

Option 1 – All growth in Bromsgrove Town, especially the Town Centre.

Option 2 – Concentrate growth in Bromsgrove Town combined with other limited brownfield development in other settlements (i.e. Hagley, Alvechurch, Wythall).

Option 3 – Apportion growth in respect of the size of each settlement on both brownfield and greenfield sites, including growth in Bromsgrove Town.

### Issue 2 – Areas of Development Restraint

What should we do with existing designated sites removed from the greenbelt?

Option 1 – Maintain them indefinitely as a reserve bank of land for growth.

Option 2 – Prioritise their release with those around Bromsgrove Town being released first.

Option 3 – Examine the need for these sites only when clear targets for housing and employment growth have been established.

### Issue 3 – Previously developed sites in the Green Belt

What should we do with these sites when existing uses become redundant?

Option 1 – Allow reuse of the existing footprint for the most appropriate use.

Option 2 – Allow reuse for employment only.

Option 3 – Allow only very limited reuse (i.e. less than the original footprint).

## 3.2.2 Key Issue 2: Housing for Everyone

### Background to Issue

Ensuring the supply of the right types of housing in the right locations is a major challenge facing Bromsgrove. The District is facing a serious oversupply of housing with the result that no general housing is being allowed at the moment. As household needs vary, we need to have a range of dwelling types and sizes including provision of appropriate housing for the aging population, an increasing amount of single person dwellings for those who require smaller homes. Affordability of housing is also a key issue with many local people unable to afford to buy a house and need to provide for essential worker accommodation in appropriate locations. To

tackle these issues the Council is producing more detailed guidance on managing housing supply and affordable housing.

## Sub-Issues and Options

### Issue 1 – Type of housing

In the future what type of housing will be required in Bromsgrove?

Option 1 – Priority given to smaller dwellings but also ensure adequate family housing to support local schools and facilities.

Option 2 – More specialised housing for our ageing population.

Option 3 – Ensure all schemes have a needs assessment for the type of dwellings being proposed but against clear guidelines with respect to 1 and 2.

### Issue 2 – Provision of affordable housing

How should we ensure further affordable housing provision?

Option 1 – Allocate land for affordable housing particularly Council or County Council owned land including school and town centre sites.

Option 2 – Allow limited general housing on brownfield sites with a high level of affordable housing provision, ensuring mixed developments.

Option 3 – Use Green Belt land adjacent to villages and Bromsgrove Town (including land removed from the Green Belt e.g. Areas of Development Restraint (ADRs))

### Issue 3 – Location of affordable housing

More affordable housing needs to be provided in the District. Where should it be located?

Option 1 – Mainly on brownfield sites in Bromsgrove Town as the District's largest settlement

Option 2 – Concentrate adjacent to rural settlements to support rural schools and services

Option 3 – Spread across the District.

### Issue 4 – Supply of housing

The Council is currently not allowing any new general market housing as enough houses have already been allowed in relation to requirements placed upon the District. In future should we continue to allow a modest but steady supply of housing or keep the restriction going and allow only affordable housing?

Option 1 – Allow no more general market housing but allow affordable housing and sheltered housing where a need has been identified.

Option 2 – Allow only conversions of redundant buildings outside the Green Belt and as part of mixed use schemes to support regeneration of Bromsgrove Town Centre

Option 3 – Allow development on all brownfield sites below a certain size.

### 3.2.3 Key Issue 3: Rural Life

#### Background to Issue

Bromsgrove is a predominately rural district containing a number of rural communities. Rural areas have faced a steady decline in farming and related industries and increased diversification of the rural economy. House prices in the District's villages have climbed out of reach of young people wanting to stay, work and live in our rural villages. The District has seen a rise in commuting out of the District to work, leading to dormitory villages and a decline in local rural facilities. The LDF needs to promote rural communities where people can live, work and access essential local facilities.

#### Sub-Issues and Options

##### **Issue 1 - Access to services in rural areas**

How should we ensure our villages contain a range of essential services?

Option 1 – Resist change of use of all existing facilities in villages.

Option 2 – Identify mixed-use village centres for local services.

Option 3 – Locate key services in the main settlements and improve transport links.

##### **Issue 2 – Village growth**

Should we allow villages to expand?

Option 1 – Only allow affordable housing for identified local needs

Option 2 – Consider characteristics of village and supporting infrastructure before allowing new development.

Option 3 – Allow a wider mix of housing in rural locations to ensure essential facilities are maintained or made viable.

##### **Issue 3 – Supporting the rural economy**

How should we support businesses in rural areas?

Option 1 – Only allow conversion of rural buildings to employment use.

Option 2 – Allow limited extension of any existing business within villages.

Option 3 – Only allow agricultural related industries in rural areas and support the relocation of other business to the main settlements.

#### **Issue 4 – Getting about without a car in rural areas**

Accessibility is an issue in rural areas, how can we improve access to services?

Option 1 – Ensure villages have a range of facilities.

Option 2 – Support improved transport links to the main service centres like Bromsgrove Town.

Option 3 – Provide a balance of the above options with only limited facilities in villages.

### 3.2.4 Key Issue 4: The Local Economy and Creating Jobs

#### **Background to Issue**

The District has a diverse economy. Historically the District's economy has been based on farming. While this does continue, over time as new employment areas have emerged then the economy has changed. Manufacturing is still the most common form of employment with 21% still employed in this sector, although real estate, education, and health and social care now cater for 15%, 11% and 15% of the workforce respectively (Census 2001).

Unemployment in the District is low with only 2.1% of the population currently unemployed in 2005 which compares favourable to the national average of 3.3% (WCC, 2005). However, the District has one of the lowest average incomes in the County for those working in the District, and it is also below national levels. Conversely income levels for the residents of Bromsgrove are generally considerably higher than the rest of the County and national figures indicating that the higher salaries are earned outside the District.

#### **Sub-Issues and Options**

##### **Issue 1 – The future of the Bromsgrove economy**

Bromsgrove has a high incidence of commuting out of the District to work. Should we concentrate the local economy on service industries to support the growing commuter population and encourage tourists or should we try to diversify our economy and attract new high technology industries?

Option 1 – Increased emphasis on service industries to support a growing population and promote tourism, i.e. shops, restaurants, leisure and tourist facilities.

Option 2 – Develop more business parks to encourage new high technology and other industries.

Option 3 – Keep the balance as it is with a mixture of economies.

## **Issue 2 – Location of new employment opportunities**

If required where should new employment land be generally located?

Option 1 – Small areas of employment within main settlements (i.e. Bromsgrove, Hagley, Rubery) to support starter businesses and small scale local firms.

Option 2 – Balance provision in Bromsgrove Town by developing large business parks on greenfield ADR sites to west of Bromsgrove (land removed from the greenbelt for future development needs).

Option 3 – Redevelop and extend existing sites to southeast and south of Bromsgrove.

## **Issue 3 – The rural economy**

How should our rural economy be developed?

Option 1 – Concentrate on Green Belt compatible businesses based around existing farming activities, tourism and leisure.

Option 2 – Encourage reuse of rural buildings to provide small scale office accommodation.

Option 3 – Encourage new business to locate in main settlements but still continue to support existing businesses in the rural areas.

## **Issue 4 – Reuse of redundant employment sites**

Occasionally large employment sites become available for re-use. How does the Council best look to reuse these sites?

Option 1 – Retain sites for traditional employment uses only.

Option 2 – Promote a mix of employment generating activities (e.g. tourism, retail)

Option 3 – Consider reuse for non-employment uses.

### **3.2.5 Key Issue 5: Shopping and Bromsgrove Town Centre**

#### **Background to Issue**

While town centres continue to act as the main focus for retail activity, over recent years the pattern of retail activity has altered. Larger food stores provide for one-stop shopping trips on a reduced frequency. Retail warehouses selling DIY goods, electrical appliances, carpets, furniture and other bulky goods have been developed. This has seen the decline of some town centres. There has also been a marked decline in the number of village shops and other local facilities in rural areas.

Bromsgrove Town Centre is still the main retailing location in the District. Other minor retailing centres exist throughout the District to serve local needs. Shopping patterns in the District are strongly influenced by the



location of nearby shopping centres. The Council need to determine the future role of Bromsgrove Town Centre and also other smaller localised shopping locations in the District.

## Sub-Issues and Options

### **Issue 1 – The role of Bromsgrove Town Centre**

What should be the future role of Bromsgrove Town Centre?

Option 1 – Promote its expansion so as to compete with other centres like Redditch and Kidderminster.

Option 2 – Promote it as a specialist shopping location to attract tourists.

Option 3 – Promote modest expansion to serve local needs.

### **Issue 2 – The future of Bromsgrove Town Centre**

What uses should we try and provide for in Bromsgrove Town Centre?

Option 1 – Increased shopping opportunities and larger stores.

Option 2 – More emphasis on providing for the leisure needs of local people (pubs, restaurants etc)

Option 3 – A mix of uses with shopping being the main use.

### **Issue 3 – The role of other local centres**

How should we ensure the viability of other local shopping centres (Alvechurch, Barnt Green, Catshill, Aston Fields, Hagley, Rubery and Wythall)

Option 1 – Keep local shopping centres only for retail uses.

Option 2 – More emphasis on providing for the leisure needs of local people (pubs, restaurants etc)

Option 3 – A mix of uses with shopping being the main use.

## 3.2.6 Key Issue 6: Learning, Leisure and Improving Health

### Background to Issue

Bromsgrove's attractive rural environment provides an excellent ready-made resource for both leisure and tourism opportunities in Bromsgrove District. Informal leisure and tourist facilities such as countryside footpaths, canals, nature reserves and the use of more formal facilities such as the Avoncroft Museum, sports centres and children's play areas provide opportunities for both local residents and visitors. The provision of good and accessible leisure facilities is also vital to achieving a healthy population. Government initiatives aimed at promoting a healthy population have raised awareness of the importance of recreational and tourist

facilities in urban areas and the increasing use of the countryside for leisure and tourism purposes.

The County Council is the Local Education Authority. As such they are responsible for all state schools in the District including large areas of playing fields attached to the schools. The District also contains the Bromsgrove campus of North East Worcestershire College.

The LDF represents an opportunity to reassess the current provision of leisure and tourist facilities within the District and to encourage sustainable proposals that improve the quality and range of leisure and tourism opportunities. The initial purpose of the Core Strategy will be to set the context and key principles.

## Sub-Issues and Options

### **Issue 1 – Provision of open space and green areas**

We need to protect existing open spaces for the benefit of the whole community and seek to where appropriate improve or provide new areas of open space.

Option 1 – Target poorly provided wards and parishes in the District.

Option 2 – Prioritise improvement of larger areas and their expansion.

Option 3 – Provide a larger number of smaller easily accessible areas.

### **Issue 2 – Provision of health facilities**

Where should health facilities be located?

Option 1 – Safeguard key accessible sites for future health service provision.

Option 2 – Seek the enhancement of existing key health service sites.

Option 3 – Maintain existing facilities.

## 3.2.7 Key Issue 7: A Safe and Well Designed Environment

### Background to Issue

Good design is now a fundamental part of the planning process and is not just restricted to the historic environment. As such the promotion of good design will flow through the preparation of all LDF documents. Good design can also lead to a safe local environment. Feeling safe is important to the well being and quality of life of all communities throughout the District. Bromsgrove is a safe place to live compared to the nearby conurbation and the rest of Worcestershire. However a countywide survey in 2004 identified levels of fear of crime in Bromsgrove to be the highest in the County.

## Sub-Issues and Options

### Issue 1 – Safer communities

Planning has a role to play in ensuring safer communities. How can we do this?

Option 1 – Improve lighting in both urban and rural areas.

Option 2 – Seek dispersal of night time entertainment uses (i.e. pubs, clubs, restaurants).

Option 3 – Promote designing out crime initiatives.

### Issue 2 – A better designed local environment

Planning is key to a better designed buildings, streets and towns. How can we promote better design?

Option 1 – Reduce conflict between car users and pedestrians through better design.

Option 2 – Produce enhancement schemes for key locations and promote design which reflects local character.

Option 3 – Reduce signage and clutter in streets.

## 3.2.8 Key Issue 8: Our Natural Environment

### Background to Issue

The District sits within the rural West Midlands Green Belt, which has contained the expansion of the conurbation and protected the rolling, undulating landscape of larger settlements farmland and wooded areas. The north of the District is characterised by ridges that form a barrier between the District and the Birmingham plateau. These ridges include the Clent Hills, Waseley Hills, and the Lickey Hills.

While there is much to celebrate regarding the district's biodiversity and landscape, there are some difficult challenges. The District's and also the wider Region's plants and animals have suffered major declines in recent decades, and there are continuing pressures from changing land uses and more indirect factors such as climate change.

## Sub-Issues and Options

### Issue 1 – The Green Belt and our rural environment

We need to protect our rural environment, especially the Green Belt as a rich source of natural biodiversity.

Option 1 – Critically assess the impact of developments acceptable in the Green Belt on the natural environment.

Option 2 – Restrict disruptive outdoor leisure uses in rural areas.

Option 3 – Prioritise the protection of the natural environment above social and economic objectives.

### **Issue 2 – Flooding and water run-off**

We need to protect our existing watercourses and reduce harm caused by flooding especially flooding resulting from development and an increase in run-off.

Option 1 – Require all new developments have sustainable drainage systems.

Option 2 – Promote buffer zones around watercourses.

Option 3 – Encourage schemes that minimise water runoff.

## 3.2.9 Key Issue 9: Getting Around

### Background to Issue

Good transport and accessibility is vital if you want a good quality of life. Without it, it would be very difficult to get to work, school, shopping or visit friends. As Bromsgrove is a largely rural District the car remains the main choice of transport. However the continuing growth and use of the motor car can only be harmful to the environment not only globally through climate change but also at the local level through increased air pollution. One of the key objectives of the LDF will be to seek to reduce travel and promote an improvement in sustainable transport options as a viable alternative to car use. However, this will not be easy due to the dispersed population of the district.

### Sub-Issues and Options

#### **Issue 1 – Reducing the need to travel**

Reducing the need to travel is a key part of ensuring access for all of the community.

Option 1 – Locate jobs and houses together.

Option 2 – Ensure better access to everyday facilities.

Option 3 – Encourage more working from home and live-work units.

#### **Issue 2 – Transport options in rural areas**

It is recognised that the car often provides the most convenient and comfortable door to door means of travel and for many rural residents there is at present little real alternative

Option 1 – Ensure better access to major service centres like Bromsgrove Town.

Option 2 – Seek the retention of essential rural facilities.

Option 3 – Seek to locate services in larger village service centres.

### **Issue 3 – Improving public transport options**

As part of a development proposal, measures to encourage and facilitate the use of public transport can be investigated.

Option 1 – Require green travel plans for all new major developments.

Option 2 – Target key public transport interchanges as locations for new development.

Option 3 – Improve facilities at public transport sites.

### **Issue 4 – Cycling, walking and motorcycling**

Cycling and walking are the most sustainable modes of travel for short journeys. For longer journeys the motorcycle is seen as a more sustainable alternative than car use.

Option 1 – Require new developments contain cycling and motorcycling facilities and improved pedestrian access.

Option 2 – Enhance existing facilities within and between settlements.

Option 3 – Ensure better linkages between new developments.

## 3.2.10 Key Issue 10: Preserving the Past

### Background to Issues

Our historic past needs to be valued and be a central part of our cultural heritage and our sense of national identity. Our historic environment is an irreplaceable record which contributes, through formal education and in many other ways, to our understanding of both the present and the past. Our historic environment also adds to the quality of our lives, by enhancing the familiar and cherished local scene and sustaining the sense of local distinctiveness which is so important an aspect of the character and appearance of our towns, villages and countryside. The protection of our heritage is also of immense importance for leisure and recreation and the effective conservation and reuse of historic buildings is at the heart of regeneration and sustainability.

### Sub-Issues and Options

#### **Issue 1 – Designating and enhancing Conservation areas**

The District has 10 Conservation Areas. Do we need more or should we enhance the existing areas first?

Option 1 – Seek to designate new Conservation Areas as a priority.

Option 2 – Seek enhancement of existing areas before designating new ones.

Option 3 – Take action first in areas where the threat to the historic environment is greatest.

### **Issue 2 – Protecting locally important buildings**

The District has many locally important buildings that are unsuitable for full national listing. We need to ensure these locally important buildings are protected.

Option 1 – Produce a list of only historic locally important buildings.

Option 2 – Prioritise action to protect locally important buildings that are not currently within Conservation Areas.

Option 3 – Ensure policy encourages viable reuse of locally important buildings.

## 4 Assessment of Effects

### 4.1 Assessment Methodology

The SA objectives used for the analysis (Table 2.1) were provided by the Scoping Report prepared by Bromsgrove DC and up dated with advice from Hyder.

These objectives were used to assess whether the various options contributed to sustainable development. The options to be tested were also provided by Bromsgrove DC and are provided in their Issues and Options paper<sup>1</sup>. The recommendations provided in this report include additional options or combinations of options that could be considered in the future.

The options were tested against the objectives in an assessment matrix and the following basic notation was used to describe the likely effects:

Key	
+	The option provides a <b>positive</b> effect towards the SA/SEA objective
-	The option provides a <b>negative</b> effect towards the SA/SEA objective
?	The effect of this option on the SA/SEA objectives is presently <b>unknown</b> *.
0	This sub-option has <b>no effect</b> on the SA/SEA objectives

Table 4-1 Assessment Notation

The following section discusses each option. The corresponding assessment tables can be found in the Appendix B. A commentary is provided for each sub-option in section 4.3 to support the assessment Matrices. This commentary highlights sustainability issues identified, suggests possible changes/mitigation and may recommend where alternative options that could be considered.

### 4.2 Commentary on Objectives

This section briefly discusses problems found during the assessment which relate to the objectives and highlights potential limitations of the assessment.

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\* Either further information is required to assess the option fully or the effects of the option are heavily dependant upon how the option is implemented. Unknown effects are not a reason for an option to be discarded and further assessment will be required.

Objective – *‘Development of a skilled workforce to meet the needs of business.*

The assessment generally showed either ‘no impact’ or ‘impact unknown’ for this objective. This is probably due to there not being any specific options which deal with training needs. Without relevant options there is little relevance for this objective.

Objectives – *‘Quality education opportunities **for all**’ and ‘Accessible services and opportunities for culture, leisure and recreation **for all**’*

The inclusion of ‘for all’ in these objectives makes them more difficult to assess as in many cases services and education opportunities may be improved generally but it is rarely possible to state whether this is applicable to everyone.

Objective – *‘Reduce the need to travel by car and increase travel choice and accessibility through integrated transport facilities’*

Since the publication of the Scoping Report, Hyder consider that there are no objectives which adequately address the issue of ‘need to travel’. As travel by private car is a major issue in Bromsgrove, Hyder has considered it appropriate to add this provision into this objective.

Objective – *‘Reduce and Prevent Crime and Fear of Crime’*

Although there are many factors that influence crime levels these are hard to assess. For example protection and enhancement of the landscape character of the area and the village and townscape may add a sense of place, pride and community cohesion, however it is hard to quantify the extent this would affect crime levels. For the purposes of this assessment it is assumed that the key factors are access to services and facilities, and safety through design. Issues of uncertainty can be partly mitigated through the introduction of planning policy that requires safety through design.

#### *Location specific impacts*

In a number of cases, impacts will depend greatly upon the specific locations of development. This has a particular importance for environmental objectives where the location of development will need to be considered in terms of impact upon biodiversity, greenbelt, landscapes and in particular specific heritage features. Whilst it is possible to assess many options generally in terms of broad environmental benefits or disbenefits and it is generally possible to say that rural environments are more sensitive than urban environments (except for where there is valuable built heritage within an urban environment), the degree of impact will be dependant upon the specific implementation of the options.

This also applies to development within the floodplain. Fluvial floodplain is limited in Bromsgrove ([www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)), although the District is crossed by a network of small watercourses which cover both



urban and rural areas. As such, it is not possible to make generalisations upon building in the floodplain without knowing specific locations for development. However, it is possible to say that new development upon greenfield sites is likely to increase the risk of flooding due to the act of adding impermeable surfaces where there once were none. This leads to an increase in surface run-off and increased incidence of flooding.

#### *Issues relating to both the urban and rural environment*

Many options have been shown to have contrasting effects upon urban and rural areas due to their relative sensitivities. Similarly, positive effects may be biased towards either urban or rural communities, with one community 'losing out' on the potential benefits of an option. It would not be wise to balance out these impacts to a neutral or 'no impact' situation as some impacts will be significant in some areas. In these cases an 'impact unknown' may have been assigned and this has been qualified in the supporting text. The issue will be addressed in greater detail in the following stages of assessment.

## 4.3 Assessment of Options

### 4.3.1 Key Issue 1: Location of Growth

#### Sub-Issue 1 – Location for growth

When new housing or employment is needed where should it go?

*Option 1 – All growth in Bromsgrove Town, especially the Town Centre.*

*Option 2 – Concentrate growth in Bromsgrove Town combined with other limited brownfield development in other settlements (i.e. Hagley, Alvechurch, Wythall).*

*Option 3 – Apportion growth in respect of the size of each settlement on both brownfield and greenfield sites, including growth in Bromsgrove Town.*

The location of growth is an important issue for many environmental, social and economic reasons as the choice of location can have direct and indirect effects on a number of other issues. Focussing growth within Bromsgrove Town has the advantages of keeping growth contained to areas that already have developed services, facilities and infrastructure. Enabling growth in Bromsgrove Town will capitalise upon the existing image and commercial successes of the town, thereby creating economies of scale. It also steers development away from the green belt and potential environmental impacts upon the rural landscape and countryside. This would also result in the social and economic benefits within Bromsgrove Town Centre such as housing provision, accessible services, reduction in poverty, vibrant communities. However, these benefits of growth are biased towards the town centre and therefore would not meet many of these SA objectives in any other areas throughout the district. Similarly, a

diverse economy may not be achieved and sustainable economic growth may hence be stifled.

Option 2 keeps the focus of development in Bromsgrove Town but also allows limited benefits to other areas through brownfield development in the wider district. This enables the positive social benefits of growth to be realised across a wider area of the district and moves away from the Bromsgrove Town bias of Option 1. This assumes that growth includes local housing development, educational, health facilities and other services as well as employment growth. Similarly, the focus on redeveloping brownfield land accords with the objectives to encourage land remediation and develop on previously developed sites. However, it is not clear whether the location of brownfield sites is appropriate to supply growth for local needs. As there remains a brownfield focus, the potential impacts upon countryside, landscape and biodiversity are limited. By spreading development across the district, particularly in well-connected pockets, the need to travel long distances and its associated environmental issues (noise, air, visual pollution) are also limited. Economies of scale would still be realised through focussing development in Bromsgrove Town but the benefits would also be spread to other areas, thereby helping to create a diverse economy.

Unlike Option 2, Option 3 includes greenfield land development and a more district-wide approach to development which would be proportional to the size of the receiving settlement. Socially and economically, this option has advantages, through spreading the benefits of growth to many areas to meet local needs, particularly in terms of creating vibrant and locally distinctive communities and creating accessible services and potentially recreational opportunities for all. Greenfield land development has many negative impacts, for example, loss of biodiversity, impact upon landscape and greenspace, impact upon water quality where run-off from new developments may be polluted, potential building in the floodplain etc. Furthermore, by reducing the emphasis on developing in areas of existing infrastructure such as Bromsgrove, it is likely that more traffic will be generated in and around smaller settlements in rural areas, leading to the associated environmental effects of traffic growth and infrastructure development.

## Recommendations

Option 2 performs best against the SA objectives, although elements of Option 3 are also attractive for social and economic reasons. An option that would focus development in Bromsgrove Town with apportioned growth focussed on brownfield sites in a few key settlements around the district and limited growth on other brownfield sites would perform well against the SA objectives.

The options do not mention any major brownfield sites such as the former MG Rover plant at Longbridge. It is important that plans for major sites such as this are also considered when defining growth options. It may be that Option 2 could be adapted to also include, 're-development of major brownfield sites'.

## Sub-Issue 2 – Areas of Development Restraint

What should we do with existing designated sites removed from the greenbelt?

*Option 1 – Maintain them indefinitely as a reserve bank of land for growth.*

*Option 2 – Prioritise their release with those around Bromsgrove Town being released first.*

*Option 3 – Examine the need for these sites only when clear targets for housing and employment growth have been established.*

Any development of greenfield land will have negative effects upon the environmental SA objectives. These impacts include: loss of biodiversity, countryside, greenspace, potentially best agricultural land; impacts upon the district's landscape; impacts upon water quality through polluted run-off from development; greenfield land may be in the floodplain; and, it would go against the principles of brownfield land regeneration and remediation. In contrast, development in appropriate and sustainable areas can bring with it economic growth and social benefits.

Option 1 suggests that ADR sites would be retained indefinitely. On environmental grounds, this only delays the inevitable. There is no indication of which sites may be released first, when or for what purpose with this option. Therefore, it is difficult to assess the implications of this option, although negative environmental consequences are likely in the long term. Holding back on development, also has the potential to have negative effects upon the supply of housing to meet local needs if it were required in an area where the ADR land could provide much needed housing and there are no brownfield alternatives. It could also lead to positive economic and social benefits not being realised.

The only difference between Option 1 and Option 2 is that in Option 2, ADR sites around Bromsgrove would be released first. These are the largest ADR sites in the district and would consequently have a larger environmental impact. Nevertheless, the relative incremental increase in development around Bromsgrove, the largest settlement in the district, would not be perceived as as great as if a large greenfield site were developed adjacent to a smaller settlement. This is due to the capacity of Bromsgrove being greater to absorb the development, with existing infrastructure, transport and services in place. Conversely, focussing development around Bromsgrove would have similar economic and social benefits to Option 1 of Sub-Issue 1, but only in the short term before the other sites are developed. This could also lead to a short term bias in these benefits being realised in Bromsgrove. Whilst sites around Bromsgrove may be released first, the option does not rule out the inevitable development of the other sites as in Option 1.

Option 3 is the preferable option as it allows for a further stage of site assessment based upon new housing and employment figures. It is likely that development would have the benefit of being subject to the environmental and sustainability requirements of the new Core Strategy.

This would result in sites being allocated on a case-by-case basis. There is a need to ensure that environmental and sustainability objectives are considered for the release of sites, specifically greenfield sites.

## Recommendations

Option 3 should be amended to include consideration of the environmental impacts of the greenbelt sites.

### Sub-Issue 3 – Previously developed sites in the Greenbelt

What should we do with these sites when existing uses become redundant?

Option 1 – *Allow reuse of the existing footprint for the most appropriate use.*

Option 2 – *Allow reuse for employment only.*

Option 3 – *Allow only very limited reuse (i.e. less than the original footprint)*

Development of brownfield sites has environmental advantages with respect to focussing development away from greenfield sites and potentially in terms of land remediation if the site is contaminated.

Allowing the reuse of the existing footprint will not have any additional impact upon greenfield land. However, it is not known what the ‘most appropriate use’ would be. The end uses could have a variety of implications in terms of delivering social and economic benefits, depending upon whether it may be housing, employment, retail, education, health care etc. Similarly, without knowing the likely types of development it is not possible to say whether the visual impacts upon the landscape would be better or worse, whether they would encourage more or less car usage or whether they might be noisy or potentially polluting developments.

Use of the sites for employment only has the potential to work towards economic objectives for high and stable employment, economic growth and also sustainable use of material assets. Nevertheless, the resulting increase in traffic to serve the development may cause increased noise and air pollution including greenhouse gas emissions. Furthermore, it would work against the objective of providing housing to meet local housing needs.

Option 3 does not say what the end use would be so it has been assumed that it would be ‘the most appropriate use’ as in Option 1. Without knowing this, it is not possible to judge this option against many of the social and economic objectives. It could be argued that by not developing the whole of the brownfield site, the social and/or economic advantages of developing the site to its full potential would not be realised. However, assuming that the undeveloped parts of the site are returned to greenspace, this option could lead to environmental advantages being realised in terms of biodiversity and landscape.

## Recommendations

Hyder recommend that a more thorough review of housing, employment and services need be undertaken to establish the most sustainable and appropriate use for each site. The 'employment only' option is unlikely to be the most sustainable option. Similarly, if the footprint of the sites are greater than that needed for new development, then this should be returned to greenspace, although not at the expense of other greenfield sites being developed in preference.

### 4.3.2 Key Issue 2: Housing for Everyone

#### Sub-Issue 1 – Type of housing

In the future what type of housing will be required in Bromsgrove?

*Option 1 – Priority given to smaller dwellings but also ensure adequate family housing to support local schools and facilities.*

*Option 2 – More specialised housing for our ageing population.*

*Option 3 – Ensure all schemes have a needs assessment for the type of dwellings being proposed but against clear guidelines with respect to 1 and 2.*

The provision of smaller dwellings with some family housing in Option 1 will provide housing for local needs and consequently improve the well-being of the population and reduce social exclusion for those sectors of the community whose housing requirements are not currently catered for. The effect on crime and the fear of crime will be dependant upon how the housing developments are designed. This will also affect how it adds to or detracts from a vibrant or locally distinctive community. The location of family housing near services will have positive effects upon access to education and services and reduce the need to travel, having a positive effect on air quality and potentially ambient noise levels. It is not possible to assess the impact upon many of the environmental issues as it would strongly depend upon the exact locations of the development.

Nevertheless, an increase in housing provision (e.g. many smaller, low occupancy dwellings) will lead to an increase in waste production and energy use. This option is unlikely to affect many of the economic objectives.

Option 2 is specific to the provision of specialist housing for the elderly. In this sense it would have a positive effect upon providing for local needs, health and well-being, reducing social exclusion and also reducing the fear of crime through building communities and if the housing incorporated wardens. As with Option 1, this option has the potential to incur environmental damage through the development of new housing, although this will entirely depend upon the location and design of the developments. Similarly, location and design will influence accessibility to services, transport and locally distinctive communities.

Option 3 refers to 'all schemes', for this, developments of above 3 or 4 houses has been assumed. If a needs assessment is undertaken for all schemes, it is presumed that all social objectives will be met, although it should be made clear whether a needs assessment would include access to services, facilities and travel. It is recommended that this is the case. As with Options 1 and 2, the extent of environmental effects will depend upon the location and design of the developments, although if the needs assessment results in there being a reduced need to travel, positive effects could be realised on air quality and ambient noise levels. It has been assumed that all development has the potential to increase energy use.

## Recommendations

Option 3 performs best against the SA objectives and could help decide whether smaller housing or specialist homes for the elderly are appropriate. However, the extent of its positive effects would be dependant upon the extent of the needs assessment. Hyder recommends that the needs assessment also take into account accessibility, access to services and facilities and reducing the need to travel. Many of the impacts also relate to quality of design, in terms of providing safety benefits, creating vibrant and locally distinctive communities and enhancing the townscape and environment.

## Sub-Issue 2 – Provision of affordable housing

How should we ensure further affordable housing provision?

*Option 1 – Allocate land for affordable housing particularly Council or County Council owned land including school and town centre sites.*

*Option 2 – Allow limited general housing on brownfield sites with a high level of affordable housing provision, ensuring mixed developments.*

*Option 3 – Use Green Belt land adjacent to villages and Bromsgrove Town (including land removed from the Green Belt e.g. Areas of Development Restraint (ADRs))*

With all options, the provision of affordable housing will work positively towards providing housing to meet local needs, it should improve the well being of the population and reduce social exclusion. None of the options will significantly affect employment, economic growth or the development of a skilled workforce. It is also considered that all new development has the potential to increase ambient noise levels, although this may be offset by a reduction in traffic noise if the development reduces the need to travel. This would be determined by the location of the development.

Option 1 has particular benefits in terms of access to education and reducing the need to travel through improved access to existing town centre services. If development is located in town centres, this can have positive effects in terms of preserving biodiversity, green space, landscape and water quality in countryside areas. However, if school sites are chosen in rural areas, adverse environmental effects may be realised in these more

sensitive areas. As the majority of historical sites are in urban areas, negative effects upon the historic environment are more likely with this option. It is not known whether there would be a preference for developing on previously developed sites or not with this option, although sustainable use of material assets is anticipated due to deterring development from greenfield sites. As with all new homes, waste production is likely to increase with this option.

Option 2 focuses development on brownfield sites with the emphasis upon mixed affordable and market housing sites. Access to services including schools will be dependant upon the development's location, and the effects upon crime will depend upon the design of the particular schemes. This will also affect the need to travel. This option has more positive effects upon the environmental objectives as development is focussed upon brownfield land. This has benefits in terms of biodiversity, countryside, landscape, flood risk and redevelopment and remediation of previously developed sites. It is also beneficial in terms of the sustainable reuse of material assets.

Option 3 shares many of the positive social benefits of Options 1 and 2 due to its focus on developing adjacent to areas where services and facilities exist. However, the presumption for developing green field sites as opposed to brownfield sites, is likely to have numerous adverse impacts upon the environmental objectives.

## Recommendations

Option 2 performs best against the SA objectives, with particular benefits in terms of the environmental objectives compared to the other options. Option 1 would also be beneficial if development were located primarily in town centres and it has greater benefits in terms of access to services and facilities. However, negative environmental impacts could be realised if school sites were re-developed in sensitive rural locations. It is recommended that Options 1 and 2 be combined.

## Sub-Issue 3 – Location of affordable housing

More affordable housing needs to be provided in the District. Where should it be located?

*Option 1 – Mainly on brownfield sites in Bromsgrove Town as the District's largest settlement*

*Option 2 – Concentrate adjacent to rural settlements to support rural schools and services*

*Option 3 – Spread across the District.*

Each of the options have the potential to provide social benefits as affordable housing can help meet local housing needs, improve the well-being of the population, reduce social exclusion and potentially improve access to education for all if located close to educational facilities. The key difference between the options is that Option 1 places a bias towards

Bromsgrove Town, Option 2 places a bias towards rural areas and Option 3 spreads development across the district. Whilst Options 1 and 2 have benefits in their own right, this can be at the expense of not providing affordable housing to other areas that may need it. The location of affordable housing primarily in rural areas may also lead to increases in travel for those requiring affordable housing but working in the larger urban centres. From this perspective, Option 3 has the most benefits.

Option 1 has greater environmental benefits as, unlike the other options it focuses upon brownfield sites in Bromsgrove Town where there is already the infrastructure to support them. Through focussing development in rural areas or spreading development across a wide area, the potential impacts and cumulative impacts upon more sensitive rural environments would be greatly increased.

## Recommendations

Option 1 performs best against the SA objectives, although it is recommended that a new, hybrid option be drafted to incorporate the benefits of each of the three options. A new option could be: *Mainly on brownfield sites in Bromsgrove Town with further development in other settlements based upon a needs assessment and prioritised on brownfield sites.*

## Sub-Issue 4 – Supply of housing

The Council is currently not allowing any new general market housing as enough houses have already been allowed in relation to requirements placed upon the District. In future should we continue to allow a modest but steady supply of housing or keep the restriction going and allow only affordable housing?

*Option 1 – Allow no more general market housing but allow affordable housing and sheltered housing where a need has been identified.*

*Option 2 – Allow only conversions of redundant buildings outside the Green Belt and as part of mixed use schemes to support regeneration of Bromsgrove Town Centre*

*Option 3 – Allow development on all brownfield sites below a certain size.*

Option 1 has positive effects upon housing provision as required and consequently upon the well-being of the population and reducing social exclusion. Its effects on access to education and services (and indirectly upon the need to travel) will be dependant upon the findings of the needs assessment and its impacts upon crime levels will relate to the specific designs of schemes. As with all new development, ambient noise levels may increase but this would be offset by any reduction in traffic flows. Environmental effects cannot be fully assessed without knowing the locations of housing development.

In Option 2, many of the social benefits of providing housing will be restricted to Bromsgrove Town although this fact can lead to an increase in



the overall accessibility to services and recreation in Bromsgrove Town and also accessibility to transport nodes. Prioritising development in the town will have beneficial impacts in terms of preserving biodiversity in sensitive areas, protecting the countryside and landscape. The redevelopment of redundant buildings may include the enhancement and preservation of buildings of heritage importance and the option also works positively with the objectives of re-use of brownfield sites and potentially the remediation of contaminated land. This option also has positive benefits in terms of employment and economic growth through the proposal of mixed-use developments and urban regeneration, including creating vibrant and locally distinctive communities.

Option 3 shares many of the positive environmental benefits of Option 2 due to its promotion of brownfield land development. It is assumed that larger brownfield sites will be reserved for other, non-housing uses. As long as the capacity of the brownfield land is sufficient to meet housing needs, this option should satisfy the objectives to provide local housing, improve the well-being of the population and reduce social exclusion. As with other housing options, the extent to which some objectives are met such as access to services, need to travel etc. will be dependant upon the exact locations of the developments. Option 3 does not share the same economic benefits as Option 2 as it does not have a focus on mixed-use or location near the existing centre of Bromsgrove.

## Recommendations

The three options have relative advantages and disadvantages. Whilst Option 2 performs best against the objectives, it is not clear whether only conversions in and around Bromsgrove Town will be sufficient to meet local housing needs. A combination option would be favourable which focuses upon brownfield land and a needs assessment including an assessment of access to services, facilities and the need to travel. The needs assessment would probably reveal that preference should be given to affordable housing as there is already an oversupply of market housing.

### 4.3.3 Key Issue 3: Rural Life

#### Sub-Issue 1 - Access to services in rural areas

How should we ensure our villages contain a range of essential services?

*Option 1 – Prevent re-use of all existing facilities in villages.*

*Option 2 – Designate more mixed-use village centres where residential use is discouraged*

*Option 3 – Locate key services in the main settlements and improve transport links.*

Prevention of re-use of existing facilities will protect change of use and loss of land allocations for facilities. This will protect rural community access to

facilities. However, this option does not allow the villages to be revitalised should facilities sites become disused. This option does not relate to new development so generally there are no effects on the environmental objectives.

The allowance for mixed-uses within village centres in Option 2 will have positive effects on social and economic objectives. This option will improve access to services and facilities to all. However there are likely to be adverse effects on the townscape and cultural heritage of these areas. This option will result in a cumulative effect of smaller scale developments. The environmental effects of development of these sites are unknown at this stage. Encouraging mixed used development will increase resource usage and increase waste generation.

Locations of key services in main settlements in Option 3 will provide economic and social benefits and capitalise on economies of scale. Provision of transport links will improve social exclusion and access to services for those within rural areas. The provision of transport links should include public transport thereby reducing the need to travel by car and reducing air quality (and green house gas emissions) and noise effects. There may be some effects on the environmental objectives dependant on site allocation however sensitive site selection should mitigate this effect.

## Recommendations

The locations of facilities should be based on needs assessment and consideration of environmental impacts. Site allocations should concentrate facilities on main settlements (Option 3).

### Sub-Issue 2 – Village growth

Should we allow villages to expand?

*Option 1 – Only allow affordable housing for identified local needs*

*Option 2 – Consider characteristics of village and supporting infrastructure before allowing new development.*

*Option 3 – Allow a wider mix of housing in rural locations to ensure essential facilities are maintained or made viable.*

Affordable houses that reflect local needs will contribute positively to social objectives. This can also ensure that essential workers and local people are provided with affordable houses thereby keeping villages viable. Option 1 may result in development of Greenfield sites if there is not sufficient provision in village centres and therefore would have adverse effects on environmental objectives. This option does not consider the adequacy of services, facilities or infrastructure in the villages.

The consideration of village characteristics in Option 2 will protect landscape and townscape and cultural heritage features. Provision of adequate infrastructure is an important consideration for any development

in village areas. This will reduce the need for associated development to support any expansion to villages.

Option 3 would contribute positively to the diversity and viability of rural areas. Whilst this option would contribute to the maintenance of existing facilities development of additional housing in rural area is likely to lead to development of greenbelt and will have associated adverse environmental effects. This effect could be mitigated by the consideration of environmental effects in site selection and housing type and density.

## Recommendations

It is considered that options for village growth are not mutually exclusive and that they could be considered in combination to address social, environmental and economic objectives.

### Sub-Issue 3 – Supporting the rural economy

How should we support businesses in rural areas?

*Option 1 – Only allow conversion of rural buildings to employment use.*

*Option 2 – Allow limited extension of any existing businesses within villages with adequate infrastructure.*

*Option 3 – Only allow agricultural related industries in rural areas and support the relocation of other business to the main settlements.*

Conversion of existing buildings does not involve additional land take or changes to the built environment and therefore this option will not have any effects on the environmental objectives. Change of use from rural to employment uses is likely to result in an intensification of use which would have the consequence of traffic generation and changes in resource usage. However these effects are largely unknown as a wide range of employment uses could be permitted. This option may not promote a diverse economy as it would not encourage tourism or leisure activities.

Option 2 would have positive effects on village businesses and the rural economy. It would ensure that development is sustainable in relation to infrastructure. Provision of extensions to existing business is likely to have reduced environmental effects than several changes of land use or large new development proposals. Concentrating business development in villages will also reduce the need to travel for these communities thereby improving accessibility and reducing social exclusion.

Option 3 would ensure the preservation of the rural landscape and way of life. This would also have no significant change in the state of the environment in the rural areas with this option. The promotion of relocation of businesses to main settlements may have localised negative economic effects in the rural areas but would have positive effects for the main settlements. Not permitting changes in agricultural uses could also deter from promoting a diverse economy.

## Recommendations

A balanced approach is required to address the rural economy to ensure a diverse and stable economy. A combination of options may need to be considered to address the economic objectives.

### Sub-Issue 4 – Getting about without a car in rural areas

Accessibility is an issue in rural areas, how can we improve access to services?

*Option 1 – Ensure villages have a range of facilities.*

*Option 2 – Support improved transport links to the main service centres like Bromsgrove Town.*

*Option 3 – Provide a balance of the above options with only limited facilities in villages.*

Option 1 will result in the reduction for the need to travel and therefore have positive effects on air quality and noise amenity. This will also improve social exclusion and accessibility to facilities. Provision of a range of facilities in villages is likely to require new development and this could effect landscape/townscape. If development occurs on Greenfield sites this would have associated environmental effects.

Improved transport links to main service centres would have beneficial effects of improving transport options, accessibility and decreasing social exclusion. Main centres would be able to support a viable public transportation system and provide sustainable transport options. Increase use of existing services in the main centres will allow capitalisation on economies of scale and allow improvements in these services and stimulate the economy. The disbenefits of this option are that this may prevent revitalisation of villages and could see a decline in use of services in these areas.

Option 3 overcomes the negative effects of Options 1 and 2 and is most desirable in relation to the sustainability objectives. However, it is recommended that the location of services be based on needs assessments and considered transportation options as part of this assessment.

## Recommendations

A balanced approach to transport options and the location of services and facilities will support the sustainability objectives. However, this needs to be based on a needs assessment.

## 4.3.4 Key Issue 4: The Local Economy and Creating Jobs

### Sub-Issue 1 – The future of the Bromsgrove economy

Bromsgrove has a high incidence of commuting out of the District to work. Should we concentrate the local economy on service industries to support the growing commuter population and encourage tourists or should we try to diversify our economy and attract new high technology industries?

*Option 1 – Increased emphasis on service industries to support a growing population and promote tourism, i.e. shops, restaurants, leisure and tourist facilities.*

*Option 2 – Develop more business parks to encourage new high technology and other industries.*

*Option 3 – Keep the balance as it is with a mixture of economies.*

Service industries currently form a large part of the employment generation in Bromsgrove. The increase of service industries to support population growth should ensure that these services are located close to existing and new populations and therefore improve accessibility, support the vitality of local areas and reduce the need to travel.

Development of business parks will have environmental effects related to site development, traffic generation and changes to the built environment. This will potentially affect biodiversity, landscape, cultural heritage and open space greenspace, however these effects are largely unknown at this stage.

The effect of Option 3 on the social and environmental objectives is largely unknown. A balanced approach to growth in the local economy would enable the environmental and social implications of development to be considered.

### Recommendations

Keeping a balanced mix of economies will ensure diversification and long-term sustainability of employment and the economy.

### Sub-Issue 2 – Location of new employment opportunities

If required where should new employment land be generally located?

*Option 1 – Small areas of employment within main settlements (i.e. Bromsgrove, Hagley, Rubery) to support starter businesses and small scale local firms.*

*Option 2 – Balance provision in Bromsgrove Town by developing large business parks on greenfield ADR sites to west of Bromsgrove (land removed from the greenbelt for future development needs).*

***Option 3 – Redevelop and extend existing sites to southeast and south of Bromsgrove.***

Smaller areas of development in existing built up areas will generally be less significant than the environmental impacts of development of Greenfield employment land and will also support the vitality of those main settlements.

Option 2 will have adverse effects on the environmental objectives due the development of Greenfield sites and not encouraging brownfield site development. Development of large sites in Bromsgrove will also detract from revitalisation of other main settlements. This option is likely to increase the need to travel and would, therefore, have adverse effects on air quality and noise.

Option 3 encourages the redevelopment of sites and, therefore, contributes positively to the objectives related to the encouragement of brownfield site redevelopment. However, extension of these sites into greenfield areas may adversely affect environmental objectives. The effects on the need to travel would be reduced due to the location of such development being adjacent to the existing transport network, for example the railway station.

## Recommendations

The development of smaller areas for employment land within existing main settlements will have lesser effect on environmental and social objectives. The re-use of existing sites adjacent to Bromsgrove Town would generally perform well against the SA objectives. In terms of the options for development of land in ADR sites west of Bromsgrove or redevelopment and extension of existing sites to the south and south-east, if these sites are taken forward, site specific environmental issues would need to be considered when making decisions on scale, type and density of development.

## Sub-Issue 3 – The rural economy

How should our rural economy be developed?

***Option 1 – Concentrate on Green Belt compatible businesses based around existing farming activities, tourism and leisure.***

***Option 2 – Encourage reuse of rural buildings to provide small scale office accommodation.***

***Option 3 – Encourage new business to locate in main settlements but still continue to support existing businesses in the rural areas.***

Option 1 would not have significant effects on the greenbelt or rural areas as only compatible land uses would be promoted. However, this option may hinder rural diversification opportunities.

The reuse of existing rural buildings would have minimal impact on the environmental objectives and would support the revitalisation of rural areas.

Option 3 provides a balanced approach to the development of the rural economy and generally supports the environmental and social objectives.

## Recommendations

All options have a positive effect on the economic objectives. Option 3 provides a balanced approach to the development of the rural economy and generally supports the environmental and social objectives.

### Sub-Issue 4 – Reuse of redundant employment sites

Occasionally large employment sites become available for re-use. How does the Council best look to reuse these sites?

Option 1 – *Retain sites for traditional employment uses only.*

Option 2 – *Promote a mix of employment generating activities (e.g. tourism, retail)*

Option 3 – *Consider reuse for non-employment uses.*

Option 1 has no major change to the existing situation and will have no significant effect on the environmental and social objectives. This option will generally have a positive effect on the economic objectives although it would not support the diversification of the economy.

Option 2 provides a mix of employment and therefore will have a positive effect on the economy and promote diversification.

Option 3 would allow for mixed use development and would support economic and social objectives. This option could also improve accessibility, affordable housing, and reduce the need to travel.

## Recommendations

Option 3 will allow a mix of land uses to be considered for sites and, therefore, could be developed to support local needs. This option should also be considered in relation to landscape, townscape, and transport options. In addition, development of large sites should encompass best practice design including safety, building sustainability, access and movement. This could be enforced through planning policy and master planning processes.

### 4.3.5 Key Issue 5: Shopping and Bromsgrove Town Centre

#### Sub-Issue 1 – The role of Bromsgrove Town Centre

What should be the future role of Bromsgrove Town Centre?

Option 1 – *Promote its expansion so as to compete with other centres like Redditch and Kidderminster.*

Option 2 – *Promote it as a specialist shopping location to attract tourists.*

Option 3 – *Promote modest expansion to serve local needs.*

Option 1 would result in an increase in commercial and retail development of Bromsgrove Centre. This may have significant effects on townscape although this could be mitigated through design statements and master planning. This option will promote employment and economic growth for Bromsgrove. Major expansion of retail within Bromsgrove Town centre may have localised adverse effects on the surrounding villages. This may increase travel by car from other areas in the District. The viability of this option needs to be investigated further to ensure that Bromsgrove could successfully compete with these other centres considering the catchment areas for each centre.

Option 2 will promote a diverse economy and would reduce the risks and negative effects associated with competing with other centres and local areas. This option would not affect the shopping areas in villages and main settlements thereby not effecting diversity and viability of these areas. This option may result in an increased need to travel and increased congestion through encouraging long-distance travel to Bromsgrove Town.

Expansion to support local needs will have reduced impacts on townscape, landscape and environmental objectives compared to the other options however there will be reduced economic benefits.

## Recommendations

The development of Bromsgrove Town Centre and other local centres should be based on retail needs assessment in the wider area. This would define Bromsgrove's role in the area in relation to other centres and therefore will ensure that options are sustainable.

## Sub-Issue 2 – The future of Bromsgrove Town Centre

What uses should we try and provide for in Bromsgrove Town Centre?

Option 1 – *Increased shopping opportunities and larger stores.*

Option 2 – *More emphasis on providing for the leisure needs of local people (pubs, restaurants etc)*

Option 3 – *A mix of uses with shopping being the main use.*

The promotion of larger stores is likely to have adverse effects upon environmental objectives specifically, if this development is located on greenfield land. This form of development is also likely to effect townscape and landscape as it will conflict with the character of the area. Increased retail development will promote employment opportunities and may stimulate the economy in the Town Centre.

Increased leisure for local people will promote community cohesion and can contribute to health and well-being. However the promotion of some forms of leisure activities could increase the fear of crime.



Promotion of mixed-uses will support diverse economy and promote employment opportunities however this option is biased towards Bromsgrove Town Centre.

## Recommendations

Sites selected for retail development should include mixed uses.

### Sub-Issue 3 – The role of other local centres

How should we ensure the viability of other local shopping centres (Alvechurch, Barnt Green, Catshill, Aston Fields, Hagley, Rubery and Wythall)

*Option 1 – Keep local shopping centres only for retail uses.*

*Option 2 – More emphasis on providing for the leisure needs of local people (pubs, restaurants etc)*

*Option 3 – A mix of uses with shopping being the main use.*

These options have similar effects as sub-Issue 2. However, this favours other local areas rather than Bromsgrove Town Centre. This will reduce the need to travel and therefore reduce air and noise pollution.

## Recommendations

Sites selected for retail development should include mixed uses based on local needs.

## 4.3.6 Key Issue 6: Learning, Leisure and Improving Health

### Sub-Issue 1 – Provision of open space and green areas

We need to protect existing open spaces for the benefit of the whole community and seek to where appropriate improve or provide new areas of open space.

*Option 1 – Target poorly provided wards and parishes in the District.*

*Option 2 – Prioritise improvement of larger areas and their expansion.*

*Option 3 – Provide a larger number of smaller easily accessible areas.*

Targeting poorly provided wards and parishes will help to address the balance of equity, although this should be based upon an assessment of need.

Providing larger open space areas may decrease accessibility for some areas or groups of the community. This effect could be partially mitigated by the provision of public transportation although it will still generate the need to travel. This option should be supported by a needs assessment to

determine the scale and type of open spaces to be provided (i.e. private or public open space or recreational facilities).

Provision of a large number of smaller accessible areas will improve social exclusion and can ensure that open space and recreation facilities are located close to areas of need thereby reduce the need to travel. However, this option would not allow regional facilities should a need in Bromsgrove be identified. This option will also allow open space areas and recreation facilities that to be developed to support new housing.

## Recommendations

This key issue needs to take forward the recommendations of the Community Strategy. A combination of options for provision of open space and green spaces (including recreation facilities) is recommended based upon needs, both now and in the future. Balancing of the options needs to consider if sustainable transportation options can be provided and that it can provide accessibility for all.

## Sub-Issue 2 – Provision of health facilities

Where should health facilities be located?

*Option 1 – Safeguard key accessible sites for future health service provision.*

*Option 2 – Seek the enhancement of existing key health service sites.*

*Option 3 – Maintain existing facilities.*

Safeguarding key accessible sites for future health care provision will ensure that needs can be met in the long term. This option does not specify site locations so the environmental objectives are difficult to access.

Enhancement of existing health service sites may give bias to Bromsgrove Town Centre and main settlements and prevent development or enhancement of services in villages.

It is essential that existing facilities be maintained to ensure rural areas have access to health care. This option will prevent the requirement to develop new facilities and, therefore, will not have adverse effects on environmental objectives. However, this option in isolation would not ensure that facilities meet local needs.

## Recommendations

A combination of options for provision of health care facilities is recommended based on the needs, both now and in the future. Balancing of the options needs to consider if sustainable transportation options can be provided and that accessibility for all can be provided.

## 4.3.7 Key Issue 7: A Safe and Well Designed Environment

### Sub-Issue 1 – Safer communities

Planning has a role to play in ensuring safer communities. How can we do this?

Option 1 – *Improve lighting in both urban and rural areas.*

Option 2 – *Seek dispersal of night-time entertainment uses (i.e. pubs, clubs, restaurants).*

Option 3 – *Promote designing out crime initiatives.*

The options relating to crime and safety do not affect many of the SA objectives, particularly relating to environmental and economic issues. Each of the options are likely to lead to reduce crime and the fear of crime and consequently improving the health and well-being of the population and helping to create vibrant and locally distinctive communities. A reduction in crime and the fear of crime can also help reduce social exclusion by adding to the quality of life of members of the community who may fear crime more, such as the elderly.

Option 1 has the potential to have adverse impacts on the landscape and countryside through introducing more street lighting and urban features in rural areas. Artificial light can deter birds and bats and hence has the potential to negatively impact upon biodiversity. It would also lead to greater electricity consumption thereby resulting in the increase in greenhouse gas emissions. Each of these impacts can be partially mitigated through careful design of directional lighting and solar powered lighting. Improved lighting can be used to illuminate historic buildings and monuments to increase their tourism value and deter criminal activity. Additional lighting also has cost implications for the short and long-term.

The dispersal of night time entertainment could lead to a reduction in night time noise levels and also mean that such facilities may become more spread out and accessible over a wider area.

### Recommendations

Each of the options has positive social benefits and would work towards reducing and preventing crime and the fear of crime. Hyder recommend that each of these options be taken forward although the introduction of more street lighting in rural areas should only be implemented where appropriate, using 'environmentally sensitive' lighting to minimise effects upon biodiversity and the landscape.

### Sub-Issue 2 – A better designed local environment

Planning is key to better designed buildings, streets and towns. How can we promote better design?

*Option 1 – Reduce conflict between car users and pedestrians through better design.*

*Option 2 – Produce enhancement schemes for key locations and promote design which reflects local character.*

*Option 3 – Reduce signage and clutter in streets.*

The options relating to a better designed local environment do not affect many of the SA objectives, particularly relating to environmental and economic issues.

Reducing conflict between car and pedestrian users should encourage more pedestrians through lower accident rates and an improved feeling of safety. This would improve physical fitness and the health and well-being of the population and would benefit socially excluded groups which do not rely on the car for transport. This would also add to the creation of vibrant and distinctive communities and increase access to recreation for pedestrians.

Enhancement schemes in key locations would also lead to improvements in well-being and reduce the fear of crime through better design in targeted locations, leading to more vibrant and locally distinctive communities. Access to culture, leisure and recreation and the protection of the settings of historic sites could also be incorporated into these schemes. Such schemes could also include pedestrianisation which would in turn reduce vehicular noise and air pollution in targeted areas. Through having regard to design which reflects local character, this option has the potential to positively impact upon townscape and historic character.

Reducing signage and street clutter can have positive benefits, as long as sufficient signage that meets the necessary highways standards is maintained. This could potentially have adverse effects on accessibility if insufficient signage were provided. Positive benefits would be realised for landscape/townscape, protecting the setting of historic sites and hence would work towards creating vibrant and locally distinctive communities. A reduction in oversize signage and clutter can lead to more open space and visibility in urban areas reducing crime and the fear of crime.

## Recommendations

Hyder recommend that each of the options are taken forward as part of a series of enhancement schemes.

### 4.3.8 Key Issue 8: Our Natural Environment

#### Sub-Issue 1 – The Green Belt and our rural environment

We need to protect our rural environment, especially the Green Belt as a rich source of natural biodiversity.

Option 1 – *Critically assess the impact of developments acceptable in the Green Belt on the natural environment.*

Option 2 – *Restrict disruptive outdoor leisure uses in rural areas.*

Option 3 – *Prioritise the protection of the natural environment above social and economic objectives.*

In Option 1, it is assumed that if developments were critically assessed for their impact upon the natural environment, they would not be given permission in a manner that would have adverse environmental impacts or impacts upon the sustainable use of material assets. In this situation, the option has the potential to limit the development of housing where it is required and potentially reduce the accessibility of services and leisure opportunities for the wider population. The option may improve the health and well-being of the population through deterring potentially polluting development and also deterring development in the floodplain.

Option 2 would also have many environmental benefits by reducing noisy, polluting or visually intrusive activities within the greenbelt. Conversely this may have negative impacts upon access to recreation and potentially negative impacts upon jobs in the recreation sector.

Option 3 is heavily skewed towards environmental protection which clearly has positive benefits on all of the environmental SA objectives, but often at the expense of social and economic objectives. In particular, negative impacts may be realised upon meeting housing needs, accessibility to services and leisure, high and stable levels of employment and economic growth. If the development of educational facilities were also overlooked in favour of pure environmental protection then this could also impact upon quality education opportunities for all and the development of a skilled workforce.

## Recommendations

Whilst environmental protection should remain high on the agenda, sustainable development should not overlook economic and social development in favour of pure environmental protectionism. As such, option 3 may be too focussed upon environmental issues. Option 1 performs best against the SA objectives as it involves a critical assessment of developments upon the environment, and this could also include the restriction of outdoor leisure activities that would have adverse environmental effects.

## Sub-Issue 2 – Flooding and water run-off

We need to protect our existing watercourses and reduce harm caused by flooding especially flooding resulting from development and an increase in run-off.

Option 1 – *Require all new developments have sustainable drainage systems.*

Option 2 – *Promote buffer zones around watercourses.*

Option 3 – *Encourage schemes that minimise water runoff.*

The requirement for all new developments to have Sustainable Drainage Systems (SuDS) is a positive step towards reducing flood risk that may be difficult to implement on technical feasibility and financial grounds. Nevertheless it would have specific benefits in terms of reducing run-off, overland flow and pressure on sewerage and draining systems thereby reducing flood risk. This would have positive benefits upon human health, increasing biodiversity, the protection of historic resources and protecting water quality.

The promotion of buffer zones around watercourses would also have benefits in terms of the retention of green space and biodiversity around watercourses and would help to limit the pollution of water courses from developments. Its positive impacts with respect to flooding relate to steering development away from the floodplain. However, this may result in areas of housing supply land being compromised.

The minimisation of water run-off should be encouraged on all schemes for its benefits on reducing flows to rivers and hence flooding and also for its benefits in reducing polluted run-off from reaching watercourses. Both would have potentially positive effects on human health. However, a scheme should not be promoted purely on these grounds as certain schemes may have many other detrimental effects.

## Recommendations

SuDS schemes should be encouraged on all new developments although this may be difficult to implement. Buffer zones, particularly around floodplains should also be adhered to. Similarly, options that encourage developments that minimise run-off are beneficial. Options 1, 2 and 3 could be combined to form: *Encourage the minimisation of water run-off through the uptake of SuDS and also incorporate buffer zones around watercourses on all new developments.*

### 4.3.9 Key Issue 9: Getting Around

#### Sub-Issue 1 – Reducing the need to travel

Reducing the need to travel is a key part of ensuring access for all of the community.

Option 1 – *Locate jobs and houses together.*

Option 2 – *Ensure better access to everyday facilities.*

Option 3 – *Encourage more working from home and live-work units.*

Locating jobs and houses together has many advantages in terms of reducing the need to travel and hence improving ambient noise levels and

air quality. Reductions in journey times and congestion are beneficial for human health, as is improved air quality. It would also be beneficial in terms of creating vibrant communities and increasing access to services which would be attracted to mixed use employment/residential developments. Reducing the need to travel generally has positive benefits upon the environmental objectives due to lower traffic flows, congestion, disturbance, visual intrusion and pollution (air, water and land). However, the option implies there will be new development to locate employment and residential land together. Consequently, without knowing locations for development, this has the potential to impact upon biodiversity, green field land, landscape, water quality, land contamination etc.

Option 2 has many social advantages through reducing the need to travel and improving access to all services. This has secondary positive benefits for improving health and well-being (through reducing stressful congestion and traffic pollution), reducing fear of crime (through improved lighting, shorter journey times and better, safer design), creating vibrant and locally distinctive communities. As with Option 1, a reduced need to travel can lead to lower ambient noise levels and improved air quality and generally positive environmental effects. However, it is not clear whether improved access also includes new transport links such as roads and rail. If this were the case, then detrimental effects upon biodiversity, landscape, water quality etc. could be incurred. As with Option 1, a reduced need to travel should also increase energy efficiency and reduce greenhouse gas emissions.

Option 3 performs well against all the environmental objectives as it expressly involves reducing the need to travel without new development. It is also beneficial in terms of reducing social exclusion (for people who do not own cars or have disabilities which prevent them from travelling) and the fear of crime through reducing the number of journeys made. Energy efficiency and sustainable use of material assets would also be improved through making fewer journeys by car and consequently greenhouse gas emissions would be reduced. Teleworking can also aid economic growth through reducing the costs of commuting and travelling long distances to business.

## Recommendations

Option 3 performs best against the SA objectives, although improving access to facilities and locating employment and residential areas together would also be beneficial, as long as the potential environmental impacts of new development to enable this are minimised.

## Sub-Issue 2– Transport options in rural areas

It is recognised that the car often provides the most convenient and comfortable door to door means of travel and for many rural residents there is at present little real alternative.

***Option 1 – Ensure better access to major service centres like Bromsgrove Town.***

Option 2 – *Seek the retention of essential rural facilities.*

Option 3 – *Seek to locate services in larger village service centres.*

Improving access to major service centres such as Bromsgrove Town assumes a certain amount of car usage. Whilst this option may ease congestion in the vicinity of major services and increase access to services from a wider catchment area, it will not reduce the need to travel and could encourage further car use and its associated environmental impacts. Improving access could also involve new road infrastructure development which may also have numerous adverse effects upon the environment.

Retaining existing rural facilities does not imply any additional development over and above what is already there so is unlikely to have direct impacts upon the existing environmental baseline. In rural areas the retention of such facilities is positive in terms of reducing social exclusion and improving the well-being of the local population. Facilities may also include schools and recreational facilities, all of which are likely to add to a vibrant and locally distinctive community in those areas. Nevertheless, these benefits would be restricted to rural areas. Maintaining local facilities will reduce the need to travel long distances, which will mean that fewer car journeys will need to be made, thereby having positive effects upon air quality, ambient noise, greenhouse gas emissions and energy efficiency. Improving access to services in each of the options is likely to have beneficial impacts upon the districts service industry and economy.

Option 3 has many similar benefits to Option 2 in that locating services in local areas increases access to services and reduces the need to travel long distances. Larger villages have a greater capacity to accept services than smaller settlements due to their existing infrastructure, especially in village centres, as opposed to expanding into greenfield sites at village boundaries. However, the likelihood of impacting upon the historic environment is increased when concentrating development in the centres. Such development would need to be sensitively designed to mitigate against such impacts.

## Recommendations

Option 3 performs the best against the SA objectives, although again a hybrid approach would be recommended that involved maintaining rural services with a focus on local centres in the form of larger villages. This would be supplemented by improving access to larger facilities in major service centres such as Bromsgrove Town. In each of these cases, there should be an emphasis on improving integrated transport facilities in order to reduce the dependency on private car usage rather than purely looking at means of making travel by car easier.

## Sub-Issue 3 – Improving public transport options

As part of a development proposal, measures to encourage and facilitate the use of public transport can be investigated.



Option 1 – *Require green travel plans for all new major developments.*

Option 2 – *Target key public transport interchanges as locations for new development.*

Option 3 – *Improve facilities at public transport sites.*

The requirement for green travel plans for all new developments performs strongly against the environmental SA objectives, as they would promote a reduction in private car dependence and its associated environmental impacts. It would also work towards reducing greenhouse gas emissions, energy usage and improving air quality. Whilst it would have few significant economic effects (other than reducing fuel costs), the promotion of green travel plans can lead to an improvement in the health and well-being of the population through encouraging walking and cycling and would improve access to services for all groups. Through potentially reducing congestion and promoting non-motorised transport, Option 1 would also add to the creation of vibrant and locally distinctive communities.

Option 2 promotes key public transport interchanges as areas for development. This would improve accessibility to services due to proximity to transport links and improve social inclusion. This would have the effect of reducing the need to travel by car and would increase travel choice, thereby having a positive effect upon the noise, air quality, energy efficiency and greenhouse gas emissions objectives. Generally speaking, focussing development at existing transport nodes would be beneficial to the environment. However, the option implies a certain level of new development at these nodes, and, the sensitivity of sites adjacent to these nodes is not known. Therefore, such new development has the potential to incur environmental damage, for example if the sites are located in greenfield areas containing sensitive habitats or fall within highly valued landscapes. It is recommended that sites are assessed against environmental criteria on a case-by-case basis.

Option 3 also promotes the development of facilities at public transport nodes, although the emphasis is more on enhancement rather than new development. This suggests that measures would be employed to improve the quality of public transport sites and encourage the uptake of public transport. Consequently this would benefit objectives that relate to social inclusion, well-being of the population, access to services for all and creating vibrant communities. The uptake of public transport should also reduce the need to travel by car and improve travel choice and accessibility through integrated transport systems. As with Option 2, a reduced dependence upon the private car has many environmental advantages, and it is less likely that the environmental consequences of new development would be an issue as the emphasis is upon enhancement of existing facilities rather than new construction.

## Recommendations

All options would be beneficial. Option 3 has many benefits, although Option 2 would probably have the greatest positive impacts in terms of

encouraging the uptake of public transport. Nevertheless, Option 2 would need to be implemented with an assessment of sites against environmental criteria on a case-by-case basis.

## Sub-Issue 4 – Cycling, walking and motorcycling

Cycling and walking are the most sustainable modes of travel for short journeys. For longer journeys the motorcycle is seen as a more sustainable alternative than car use.

*Option 1 – Require new developments contain cycling and motor cycling facilities and improved pedestrian access.*

*Option 2 – Enhance existing facilities within and between settlements.*

*Option 3 – Ensure better linkages between new developments.*

Each of these three option works towards reducing car usage and promoting cycling, walking and motorcycling. As a result, this would have numerous environmental benefits derived from less traffic congestion, noise, air pollution, polluted run-off to water-courses, reduced impact upon biodiversity and visual amenity, lower impacts upon the historic environment, increased energy efficiency, reduced greenhouse gas emissions and more sustainable use of material assets. All options would contribute to improving the health and well-being of the population through encouraging exercise and lowering the stress of traffic congestion and pollution. Similarly, all options would work towards reducing social exclusion and poverty through promoting cheaper means of travel than the private car. Conversely, deterring the use of the private car may increase the fear of crime, for example through encouraging people to walk to work in the dark in winter.

## Recommendations

All of the options are generally beneficial in terms of the SA objectives.

### 4.3.10 Key Issue 10: Preserving the Past

#### Sub-Issue 1 – Designating and enhancing Conservation areas

The District has 10 Conservation Areas. Do we need more or should we enhance the existing areas first?

*Option 1 – Seek to designate new Conservation Areas as a priority.*

*Option 2 – Seek enhancement of existing areas before designating new ones.*

*Option 3 – Take action first in areas where the threat to the historic environment is greatest*

The designation of conservation areas is an important means for protecting areas of valuable built heritage and/or landscapes/townscapes of historic value. Through doing so, tight controls are employed on development within those conservation areas. Biodiversity is also protected through controls over preserving Tree Preservation Orders in conservation areas. These three options refer to three different approaches to the enhancement of conservation areas, either by focussing on designating new areas, looking after existing areas first or assessing action based upon threats to the historic environment.

When assessing each option against the SA objectives, they come out with similar results, generally being positive in terms of preserving and enhancing the historic environment, landscapes, biodiversity, countryside and open space, material assets and creating vibrant and locally distinctive communities. Economic benefits may also be realised through increasing tourism in conservation areas. For other SA objectives, these options are unlikely to have any significant implications.

Option 1 focuses on creating new conservation areas. This is a positive step where conservation is appropriate. Conservation areas also have value as a recreational resource.

Option 2 places a greater emphasis upon enhancing existing conservation areas before designated new areas. It is important to maintain existing areas as an ongoing process, nevertheless, this should be maintained under the requirements of PPG15 as a matter of course.

Option 3 takes a more case-by-case approach for either maintaining and enhancing or designating new conservation areas depending upon a review of the threats to and needs of the historic resource. As such, it is considered that this is a more pragmatic approach and this will cover the objective of Options 1 and 2 as appropriate.

## Recommendations

Option 3 performs best against the SA objectives.

### Sub-Issue 2 – Protecting locally important buildings

The District has many locally important buildings that are unsuitable for full national listing. We need to ensure these locally important buildings are protected.

*Option 1 – Produce a list of only historic locally important buildings.*

*Option 2 – Prioritise action to protect locally important buildings that are not currently within Conservation Areas.*

*Option 3 – Ensure policy encourages viable reuse of locally important buildings.*

Option 1 implies that historic locally important buildings will be recorded. This is an important action to improve protection and enhancement of these

buildings, although to have a meaningful, positive impact upon other SA objectives, it must have provision for their protection and preferably also enhancement.

Option 2 affords this protection with the priority on those buildings which do not fall within the level of protection already afforded by conservation area status. The protection and preferably also the enhancement of these buildings would have positive effects upon creating a vibrant and locally distinct community, improving access to local culture, preserving the district's quality townscapes and the historic environment, whilst also protecting material assets.

Option 3 is difficult to assess as the end use of the building could have a variety of contrasting social, environmental and economic implications. Like Option 2, it has the potential to create many benefits with respect to townscape, the historic resource etc. It also has the potential to create many social benefits, for example if the buildings were re-used as teaching centres, health centres or community centres, for example.

## Recommendations

Option 2 has the most positive impact upon the SA objectives. However, Option 1 should also be taken forward, and, if the end-use were environmentally acceptable and appropriate to the building and its setting, Option 3 would provide wider benefits.

As such, a recommended option could be, *Protect and enhance locally important buildings and prioritise their re-use for purposes that would be appropriate to the scale and setting of the building whilst having minimal environmental impacts.*

## 5 Key Recommendations

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The following provides an overview of the key recommendations of this assessment:

### Issue 1: Location of Growth

Options that focus upon brownfield development in preference to greenfield and apportion growth with respect to the size of the receiving settlement perform more favourably in terms of the SA objectives. Further attention should be given to options relating to major brownfield sites such as the former MG Rover works at Longbridge just north of the District boundary. This is a transboundary issue which affects employment, growth and the economy of Bromsgrove and should be afforded special attention in the Bromsgrove Core Strategy. It is also important that decisions on growth areas should be made with the benefit of needs assessments. This is particularly important for ADRs and previously developed green belt land. Needs assessments should incorporate a review of housing, employment and service needs whilst considering environmental implications, particularly on greenfield ADR sites.

### Issue 2: Housing for Everyone

Housing allocations should also be made based upon a thorough assessment of need which should also incorporate issues of accessibility, access to services and facilities and reducing the need to travel. The provision of affordable housing appears to be a priority over market housing, and development should again be focussed on brownfield land, avoiding development of greenfield sites. Mixed-use developments perform well against the SA objectives and there should be an emphasis upon links to safe and high quality design. The correct ratio of urban to rural development should be struck based upon needs assessment and reducing the need to travel. Again, the relative size and capacity of settlements to receive new housing developments should be considered. A new option for location of housing development could be: *Mainly on brownfield sites in Bromsgrove Town with further development in other settlements based upon a needs assessment and prioritised on brownfield sites.*

### Issue 3: Rural Life

The locations of facilities should be based on needs assessment and consideration of environmental impacts. Site allocations should concentrate facilities on main settlements. It is considered that options for village growth are not mutually exclusive and that they could be considered in combination to address social, environmental and economic objectives. A balanced approach is required to address the rural economy to ensure a diverse and stable economy. A combination of options may need to be

considered to address the economic objectives. A balanced approach to transport options and the location of services and facilities will also support the sustainability objectives. However, this needs to be based upon a needs assessment and should be covered by design statements.

#### Issue 4: The Local Economy and Creating Jobs

A balanced mix of economies should ensure diversification and long-term sustainability of employment and the economy. In terms of location for employment development, the development of small employment sites within main settlements should lead to generally reduced environmental impacts, although the re-use of existing sites would be a better option. The re-use of large redundant employment sites should encompass best practice design including safety, building sustainability, reducing the need to travel, provision of transport options and addressing access and movement. Consideration should be given to provision of mixed-used development on these larger sites. This could be enforced through Area Action Plans and the master planning processes. Development of land west of Bromsgrove or redevelopment and extension of existing sites to the south and south-east will require site specific environmental issues to be considered in more detail.

#### Issue 5: Shopping and Bromsgrove Town Centre

The development of Bromsgrove Town Centre and other local centres should be based on retail needs assessment in the wider area. This would define Bromsgrove's role in the area in relation to other centres and therefore will ensure that options are sustainable. Sites selected for retail development should include mixed uses.

#### Issue 6: Learning, Leisure and Improving Health

This key issue needs to take forward the recommendations of the Community Strategy. A combination of options for provision of health care facilities is recommended based on the needs, both now and in the future. Balancing of the options needs to consider if sustainable transportation options and improved accessibility can be provided.

#### Issue 7: A Safe and Well Designed Environment

Each of the options proposed contribute positively towards the SA objectives in general. Important considerations are measures to reduce crime and the fear of crime through better design and also to consider the setting of the historic and natural environment in the design. These issues should be incorporated into the appropriate SPDs.

#### Issue 8: Our Natural Environment

Whilst environmental protection should remain high on the agenda, sustainable development should not overlook economic and social development in favour of pure environmental protectionism. It is important

that all developments on greenfield sites should be subject to a needs assessment incorporating compliance with environmental objectives. Both SuDS and buffers around watercourses perform positively against the SA objectives and potentially a hybrid option could be developed such as: *Encourage the minimisation of water run-off through the uptake of SuDS and also incorporate buffer zones around watercourses on all new developments.*

## Issue 9: Getting Around

It is important to reduce the need to travel particularly by private car. Therefore, promoting teleworking and green travel plans in conjunction with developing at public transport nodes and enhancing public transport provisions would be positive options. It is also important that new development options relating to transport nodes consider environmental implications. Access to rural services should be improved to reduce the need to travel long distances but again, these should be subject to environmental considerations. A hybrid approach would be recommended that involves maintaining rural services with a focus on local centres in the form of larger villages. This would be supplemented by improving access to larger facilities in major service centres such as Bromsgrove Town. In each of these cases, there should be an emphasis on improving integrated transport facilities in order to reduce the dependency on private car usage rather than purely looking at means of making travel by car easier. All options to improve cycling and walking perform well against the SA objectives apart from the objective to reduce crime and the fear of crime.

## Issue 10: Preserving the Past

Comprehensive schedules of heritage resources and their condition should be maintained and action should be prioritised where it is required most. The re-use of redundant buildings of heritage interest is positive so long as it is undertaken in a manner sensitive to the building and its setting.

## 6 References

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- <sup>i</sup> Bromsgrove District Council (June 2005) Local Development Framework Issues and Options (Full Version). Bromsgrove District Council.
- <sup>ii</sup> Bromsgrove District Council (May 2005) Local Development Framework – Sustainability Appraisal: Scoping and Baseline Report. Bromsgrove District Council.
- <sup>iii</sup> Hyder Consulting (UK) Ltd (April 2005) Sustainability Appraisal Verification: Review and Verification of the SA/SEA Scoping Report
- <sup>iv</sup> Office of the Deputy Prime Minister (2004) Draft Practical Guide to the Strategic Environmental Assessment Directive (Consultation Document). ODPM: London.
- <sup>v</sup> Office of the Deputy Prime Minister (2004) Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (Consultation Paper). ODPM: London.
- <sup>vi</sup> HMSO (2004) The Environmental Assessment of Plans and Programmes Regulations 2004
- <sup>vii</sup> European Commission (2001) Strategic Environmental Assessment Directive 2001/42/EC ("on the assessment of the effects of certain plans and programmes on the environment", referred to as the SEA Directive)



**Appendix**  
**Sustainability Appraisal of Issues and Options Paper**  
**2nd Interim Report**

This report forms an addendum to the report completed by Hyder Consulting in June 2005 which appraised the original issues and options identified at that time. In the meantime however new issues have arisen and additionally it is considered that some of the original issues need updating. As the Sustainability Appraisal is now an integral part of the new LDF, a systematic examination of the compatibility of the new options against SA objectives is therefore required. A reminder of the SA objectives is provided below, followed by a general assessment of the options, together with a recommendation. An appendix is attached which provides a matrix indication a detailed assessment of the compatibility of the options against SA objectives.

**Sustainability Objectives**

**Social Objectives**

- 1) The provision of housing to meet local housing needs
- 2) An improvement in the health and well-being of the population
- 3) A reduction in poverty and social exclusion
- 4) Quality education opportunities for all
- 5) Reduce and prevent crime and fear of crime
- 6) Vibrant and locally distinctive communities
- 7) Accessible services and opportunities for culture, leisure and recreation for all
- 8) Reduce the need to travel by car and increased travel choice and accessibility through integrated transport facilities
- 9) Reduction in ambient noise levels and incidences of noise pollution

**Environmental Objectives**

- 1) Conserve and enhance the District's biodiversity
- 2) Protect the countryside, green spaces, green belt and best agricultural land

- 3) Protect and enhance the district's high quality landscapes
- 4) Protect and enhance the qualities of the historic environment
- 5) Address the waste hierarchy (reduce, reuse, recycle)
- 6) Protect and enhance water quality and maintain sustainable water resources
- 7) Reduce number of properties at risk from flooding
- 8) Guard against land contamination and encourage remediation of contaminated land
- 9) Optimum use of previously developed land to support regeneration
- 10) Increased energy efficiency and a reduction in greenhouse gas emissions
- 11) Improved air quality throughout the District

### Economic Objectives

- 1) High and stable levels of employment
- 2) Sustainable economic growth and a diverse economy
- 3) Development of a skilled workforce to meet the needs of business
- 4) Sustainable use and development of material assets

### Assessment of Options

#### A) New Housing Growth

##### *Option 1:*

*All new development should be concentrated within the existing ADR's and through the development of suitable brownfield sites (even if this means higher density development, including "living over the shop").*

##### *Option 2:*

*In addition to the ADR's a limited amount of greenfield sites should be released adjacent to existing settlements, so that the aims of sustainability are fulfilled and the impact on existing infrastructure is minimised.*

##### *Option 3:*

*Growth should be apportioned in respect of the size of each settlement on both brownfield and Greenfield sites, including growth in Bromsgrove town.*

##### *Option 4:*

*Sufficient green belt land should be released to cater for both locally generated and in migration housing needs.*

Option 1 allows development within the ADR's but also encourages the development of brownfield sites, potentially within Bromsgrove Town and the wider District. The ADR's are all located on the edge of existing settlements. Focussing growth around existing settlements has the potential advantage that use can be made of existing infrastructure, services and facilities thereby encouraging accessible services and opportunities. However, the ADR's are typically greenfield sites and therefore development could incur negative environmental impacts on the rural landscape, countryside and biodiversity. It is also recognised however that brownfield sites may have significant biodiversity or geological interest. By spreading development across the District but within well connected areas, the need to travel long distances and the associated environmental issues (noise, air and visual pollution) are potentially limited.

Option 2 suggests, in addition to the release of ADR land, the release of limited greenfield sites adjacent to existing settlements.

Focussing growth across the wider district allows the positive social benefits of growth to be spread over a wider area but moves away from focussing growth on Bromsgrove town and the abovementioned benefits of economies of scale.

Option 3 includes greenfield and a more district-wide approach to development which would be proportional to the size of the receiving settlement. Socially and economically this option has advantages through spreading the benefits of growth to many areas to meet local needs, particularly in terms of creating accessible services and potential recreational opportunities for all. Greenfield land development does however have many negative environmental impacts for example, loss of biodiversity, impact upon landscape and greenspace, impact upon water quality where run off from new developments may be polluted, impact on flooding etc. Furthermore by reducing the emphasis on developing in areas of existing infrastructure such as Bromsgrove, it is likely that more traffic will be generated in and around smaller settlements in rural areas, leading to the associated environmental effects of traffic growth and infrastructure development.

Option 4 suggests the release of green belt land which may have many negative environmental impacts as detailed in option 3. Socially this option could be challenging in relation to mobility, as transport options may be limited. However, releasing such land for development especially where there are no brownfield alternatives may have a positive impact upon the supply of housing to meet local needs, with related economic and social benefits.

#### Recommendation

Option 1 performs best against SA objectives, as it advocates concentrating development around existing developed areas thereby maximising the use of existing resources/infrastructure and reducing the need to travel.

## B) The Natural Environment

### B1) Climate Change and Renewable Energy

*Option 1: New developments to obtain a set percentage of their energy from a renewable/low carbon source (in line with National and Regional targets).*

*Option 2: New developments to achieve a set percentage which is above National/Regional targets of their energy from a renewable/low carbon source.*

*Option 3: Include a presumption in favour of applications for renewable energy technologies in the local area.*

All options have the ability to comply with the environmental objectives which seek a reduction in greenhouse gas emissions and improve air quality throughout the District, albeit their impact will vary in degree. All options should also gradually have a positive social impact in terms of health and well-being. There is a potential negative economic impact initially with the developer bearing the possible increased cost of developing/providing such technologies but with prospective longer term end user savings in energy costs. The development of renewable energy technologies, which these options encourage, could lead to a diversification of the local economy.

#### Recommendation

All options perform fairly consistently against SA objectives with Options 1 and 2 being more prescriptive in their goals.

### B2) Flooding

*Option 1: Development on the flood plain should be avoided.*

*Option 2: Development which increases the risk of flooding elsewhere within the District and beyond the District's boundaries should be avoided.*

*Option 3: Development should be designed to reduce the impact of flooding and prevent increases in flood risk through for instance, the inclusion of Sustainable Drainage Systems (SUDS), water harvesting and innovative design solutions.*

*Option 4: The inclusion of flood water storage areas should be encouraged. For example future flood risk can be minimised by providing balancing ponds and naturalising water courses.*

All of the options specifically aim to reduce the number of properties at risk from flooding.

Options 1 and 2 both have environmental, social and economic benefits. The discouragement of development within the flood plain obviously avoids the danger of development being flooded with resultant often serious social and economic repercussions. Option 3 encourages the use of SUDS which is a

positive step towards reducing flood risk. This may in some instances be difficult to implement on technical feasibility and financial grounds. Nevertheless it would have specific benefits in terms of reducing run-off, pressure on sewerage and drainage systems and the reduction of flood risk, as would the encouragement of water harvesting. This would have positive benefits upon human health, increasing biodiversity and protecting water quality. The support of innovative design solutions may additionally have positive economic benefits by encouraging the development of new technologies thereby diversifying and strengthening the economy. Option 4 encourages the inclusion of water storage areas and naturalising water courses. This would result in benefits in terms of retention of open space, recreation and biodiversity around watercourses. It would also assist in limiting the pollution of water courses from developments.

### Recommendation

Option 3 performs best against SA objectives possibly because it is the most comprehensively worded option. It is recommended however that this option be merged with option 2 to further strengthen it.

### B3) Waste and Recycling

*Option 1: New developments should include space for recycling (ie green bins) and encourage water harvesting methods (for example, water butts) in their proposals.*

*Option 2: New developments should include space for recycling (ie green bins), encourage water harvesting methods, consider including community composting facilities and use of 'grey water' schemes where appropriate.*

*Option 3: New developments should use a set percentage of recycled or sustainably produced materials in their construction (where appropriate).*

More sustainable waste management aims to move the management of waste up the waste hierarchy of reduction, reuse, recycling and composting. Disposal as a last resort aims to protect human health and the environment

Option 1 aims would contribute to the reduction of waste, recycling and some reuse, which have social, environmental and economic benefits. It would also have a positive impact in terms of flood risk.

Option 2 additionally aims to utilise waste as a source of energy thereby helping to break the link between economic growth and the environmental impact of waste. This option explicitly goes beyond environmental issues, whilst addressing the economic benefit of utilising, to some degree a renewable source of energy, or at least not wasting finite resources. It would also help to conserve water.

Option 3 carries social, environmental and economic implications. It would encourage the development of new recycled products, thereby potentially developing innovative technologies, whilst also conserving natural resources.

## Recommendation

All options perform consistently with SA objectives. Option 3 does however present a departure from the first two options and therefore should be amalgamated with ideally option 2 which has more comprehensive wording.

### B4) Biodiversity

*Option 1: Where possible all development should provide some positive benefit for biodiversity and the natural environment.*

*Option 2: Developments which would cause unnecessary harm to biodiversity and the natural environment should be resisted wherever possible.*

*Option 3: Prioritise protection of biodiversity and the natural environment highly, but weigh this against social and economic objectives when considering development proposals.*

*Option 4: Consider the impacts from development in a wider environmental context, paying attention to potential effects on the ability of biodiversity to adapt to climate change.*

Options 2 and 4 have the potential to limit development where it is required and hence potentially limit opportunities for the wider population. This option may benefit health and well-being, for example by resisting polluting development and have positive benefits for all of the environmental SA objectives. It may however have negative impacts, for example, in meeting housing needs, accessibility to services, including education and leisure.

Option 3, and to some extent Option 1, recognise that environmental protection should remain a priority but that economic and social development should not be overlooked.

## Recommendation

Option 1 appears to perform best against SA objectives, possibly due to its more general wording and implied recognition of the need for balanced development decisions. It facilitates decisions which recognise that environmental protection should remain high on the agenda but that other social and economic factors are also important.

**Sustainability Assessment matrix**

Objective compatible = +, Possible conflict= /, Mutually incompatible= ^, Compatibility unknown =?, No impact on each other = 0

	ISSUE A New Housing Growth				ISSUE B The Natural Environment													
	option1	option2	option3	option4	B1 option1	option2	option3	B2 option1	option2	option3	option4	B3 option1	option2	option3	B4 option1	option2	option3	option4
SO1 The provision of housing to meet local housing needs	/	+	/	+	/	/	/	/	/	+	+	?	+	+	/	/	+	/
SO2 An improvement in the health and well-being of the population	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	+	+	+
SO3 A reduction in poverty and social exclusion	+	/	+	/	+	+	+	0	+	0	0	0	0	0	0	0	0	0
SO4 Quality education opportunities for all	+	+	+	/	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SO5 Reduce and prevent crime and fear of crime	+	?	+	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SO6 Vibrant and locally distinctive communities	+	+	+	/	0	0	0	0	0	+	+	+	+	+	+	+	+	0
SO7 Accessible services and opportunities for culture, leisure and recreation for all	+	+	+	0	0	0	0	?	0	+	+	+	+	0	/	/	+	/
SO8 Reduce the need to travel by car and increased travel choice and accessibility through integrated transport facilities	+	+	+	/	0	0	0	0	0	0	0	+	+	+	?	?	?	?
SO9 Reduction in ambient noise levels and incidences of noise pollution	/	/	/	/	/	/	/	0	0	0	0	?	?	?	+	+	/	0
EV1 Conserve and enhance the District's biodiversity	/	/	/	/	+	+	+	+	+	+	+	+	+	+	+	+	+	+
EV2 Protect the countryside, green spaces, green belt and best agricultural land	+	/	/	/	?	?	?	+	+	+	+	+	+	0	+	+	+	+
EV3 Preserve and enhance the District's high quality landscapes	+	+	/	/	/	/	/	?	+	+	+	0	0	?	+	+	/	+
EV4 Protect and enhance the qualities of the historic environment	?	?	?	?	/	/	/	0	0	0	0	/	/	?	+	+	/	0
EV5 Address the waste hierarchy (reduce, reuse, recycle)	+	/	+	/	+	+	+	0	0	+	+	+	+	+	+	+	+	+
EV6 Protect and enhance water quality and maintain sustainable water resources	0	0	0	0	0	0	0	+	+	+	+	+	+	0	+	+	/	+
EV7 Reduce number of properties at risk from flooding	0	0	0	0	0	0	0	+	+	+	+	+	+	0	0	0	0	0
EV8 Guard against land contamination and encourage remediation of contaminated land	+	/	/	/	+	+	+	?	?	?	?	?	?	?	+	+	/	+
EV9 Optimum use of previously developed land to support regeneration	+	/	+	^	0	0	0	?	?	?	?	?	+	+	/	/	?	?
EV10 Increased energy efficiency and a reduction in greenhouse gas emissions	+	+	+	/	+	+	+	0	0	0	0	+	+	+	+	+	+	+
EV11 Improved air quality throughout the District	/	/	/	/	+	+	+	0	0	0	0	0	0	0	+	+	/	+
EC1 High and stable levels of employment	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
EC2 Sustainable economic growth and a diverse economy	?	?	?	?	+	+	+	+	+	+	+	+	+	+	/	/	+	/
EC3 Development of a skilled workforce to meet the needs of business	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
EC4 Sustainable use and development of material assets	+	/	+	/	+	+	+	0	0	+	+	+	+	+	?	?	?	?