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Our ref: 995544  
Your ref: None



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**BY EMAIL ONLY**

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Dear Mr Dunphy

### **Bromsgrove District Plan – pre-submission consultation**

Thank you for your consultation on the above dated 30 September 2013 which was received by Natural England on 02 October 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes this Plan and is satisfied that it is positively prepared, justified, effective and consistent with national policy, and therefore, in our view, sound. The detailed comments which follow are intended to identify parts of the Plan which we particularly support and areas where minor amendments would make a substantial improvement to its compliance with the NPPF.

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### **Bromsgrove District Plan**

We welcome the inclusion of the protection and enhancement of the natural environment within the Key Challenges, Vision and Strategic Objectives.

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### **BDP1 Policy Sustainable Development Principles**

Natural England welcomes the inclusion of this policy. We particularly welcome the inclusion of point BDP1.4 d),

*In considering all proposals for development in Bromsgrove District regard will be had to the following:*

*d) The quality of the natural environment including any potential impact on biodiversity, landscape and the provision of/and links to green infrastructure (GI) networks.*

We also welcome point b) on air quality and point g) on climate change mitigation and adaptation.

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### **BDP5A Policy Bromsgrove Town Expansion Sites Policy**

Natural England welcomes the inclusion of BDP5A.7 points i) and j):

i) The sites will have an overall strategy for green infrastructure (incorporating SuDS and blue infrastructure) that maximises opportunities for biodiversity and recreation throughout, creating a green corridor around the Battlefield Brook (BROM2) and in the case of BROM3, links to Sanders Park;

...

2 j) Important biodiversity habitats and landscape features should be retained and enhanced with any mitigation provided where necessary. There should be no net loss of hedgerow resource within the sites. Full account should be taken of protected and notable species (e.g badgers, reptiles, water voles and bats);

We consider that this provides strong compliance with the requirement set out in paragraph 114 of the National Planning Policy Framework (NPPF) that Local Planning Authorities (LPA) should plan positively for the "creation, protection, enhancement and management of networks of biodiversity and green infrastructure".

We also welcome the inclusion of walking and cycling in point c).

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### RCBD1.1 Policy Redditch Cross Boundary Development

Natural England particularly welcomes the inclusion of points RCBD1.9 iv and v:

IV. Walking and cycling routes should be well integrated with the Green Infrastructure Network. Site 1 Foxlydiate should make full use of existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch's Way and Site 2 Brockhill should create routes.

V. Both sites will have an overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity. Green Corridors should be created around Spring Brook in Site 1 Foxlydiate and the Red Ditch in Site 2 Brockhill. Both sites should be sensitively designed to integrate with the surrounding existing environment and landscape. In particular, development should be respectful and sympathetic to the topography of the sites, with no development on prominent ridge lines and where appropriate retain tree lined boundaries.

In point v we suggest a minor wording change, "landscape geodiversity" should probably read "landscape and geodiversity".

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### BDP16 Policy Sustainable Transport

3 Natural England welcomes the requirement for walking and cycling routes to be provided within the context of green infrastructure (BDP16.6).

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### BDP17 Policy Town Centre Regeneration

4 We welcome the references to the re-naturalisation of the Spadesbourne Brook in the supporting text (8.224). However, point BDP17.6 in the policy is a little confused. Water course re-naturalisation could potentially aid climate change adaptation through improved water management assisting flood attenuation or the evaporation of water cooling the air and helping to keep an urban area cool, but this hasn't been described in the supporting text. We suggest perhaps adding a point on climate change adaptation to the consideration of the Spadesbourne Brook in the supporting

text, and separating point BDP17.6 out into two separate points.

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### **BDP19 Policy High Quality Design**

Paragraph 8.258 in the supporting text makes a sweeping statement that *"It is well understood that most development damages the natural environment and it is important that the resulting damage to the environment can be minimised."* The rest of the paragraph is focused on carbon emissions. If this first sentence is also about carbon emissions then we would recommend amending it to make this clearer.

5 We welcome the inclusion of point q) within the policy itself, which requires all developments to incorporate soft landscaping and measures to reduce the potential impact of pollution (air, noise, vibration, light, water) to occupants, wildlife and the environment.

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### **BDP21 Policy Natural Environment**

6 Natural England welcomes the inclusion of this policy. However, we recommend the following amendments. Whilst we do not consider these to be soundness issues, the recommendations regarding the sites hierarchy, soils and agricultural land quality and are intended to improve the Plan's compliance with the NPPF.

#### **Sites hierarchy**

The NPPF states:

*113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.*

We are concerned that this basic site hierarchy has not been clearly established within the Plan. We recommend establishing this within the policy and/or supporting text.

#### **Soil and agricultural land quality**

The previous iteration of this policy covered the best and most versatile agricultural land. This has been removed from the pre-submission policy. We strongly recommend including a point to cover the protection of soils and the best and most versatile agricultural land. This would help to translate NPPF paragraphs 109 and 112.

Plan policies should take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example to:

- Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
- To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and,
- where development is proposed, ensure soil resources are conserved and managed in a sustainable way.

### **Biodiversity offsetting**

We welcome the reference to the mitigation hierarchy in point d). However, this mitigation hierarchy is also very relevant with regard to biodiversity offsetting, which is referred to in point e). We recommend clarifying in the supporting text that biodiversity offsetting would only be considered in accordance with the mitigation hierarchy.

### **Landscape**

We would welcome reference to the European Landscape Convention in paragraph 8.282.

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### **BDP23 Policy Water Management**

7 We welcome the reference to green infrastructure in point g).

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### **BDP24 Green Infrastructure**

8 Natural England fully supports this policy. In particular, we welcome the reference to the work of the Worcestershire GI Partnership, including the GI Concept Statement for BROM2 Perryfields Road and the reference to GI Concept Plan in point d) of the policy.

We consider that this policy will help to achieve the requirement set out in paragraph 114 of the National Planning Policy Framework (NPPF) that Local Planning Authorities (LPA) should plan positively for the "*creation, protection, enhancement and management of networks of biodiversity and green infrastructure*".

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### **Habitats Regulations Assessment**

9 Natural England is satisfied that the Local Planning Authorities conclusion that the Bromsgrove District Plan would not result in likely significant effects on European sites, alone or in combination with other plans or projects, is correct.

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We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

